Corporate Responsibility Report of the ACS Group 2014

Madrid, 24 March 2015

Contents

1. Letter from the Chairman 6
2. The ACS Group 7
   2.1. Company Profile 7
      2.1.1. Corporate Strategy 7
      2.1.2. Description of the ACS Group's Activities 7
      2.1.3. The Value of our Businesses 9
   2.2. The ACS Group and Corporate Responsibility 10
      2.2.1. Project one 11
         2.2.1.1. Project one: defining material aspects in the CR field 12
         2.2.1.2. The ACS Group's Main Management Indicators in CR 13
      2.2.2. The ACS Group and its Stakeholders 15
         2.2.2.1. Transparency in Institutional Relationships 16
   2.3. ACS Group Governance 17
      2.3.1. ACS Group Shareholders 17
         2.3.1.1. Communication with Shareholders 18
         2.3.1.2. Information Transparency 18
         2.3.1.3. ACS Governance Structure 20
         2.3.1.4. Governance Procedures in ACS 21
         2.3.1.5. Shareholders Rights and the General Shareholders' Meeting 22
      2.3.2. Risk Control Systems 23
3. Ethics 25
   3.1. Ethics and Integrity: Summary, Objectives and General Principles 25
      3.1.1. Ethics and Integrity: Code of Conduct 25
      3.1.2. Management Principles 26
         3.1.2.1. Field of action and scope of the Code of Conduct 26
         3.1.2.2. Actions to promote good ethical practices 26
         3.1.2.3. General Code of Conduct Monitoring Committee 27
         3.1.2.4. Ethical Channel 28
      3.1.3. Management Indicators 31
      3.1.4. Risks 31
4. Efficiency 33
   4.1. Clients and Contracting 33

4.1.1. Strategy 33
4.1.2. Management Principles 33
4.1.2.1. Monitoring and Communication 34
4.1.2.2. Client Satisfaction 34
4.1.3. Main Indicators 34
4.1.4. Risks 34
4.2. Quality 35
4.2.1. Strategy 35
4.2.2. Management Principles 35
4.2.3. Main Indicators 36
4.2.4. Risks 36
4.3. Suppliers: 37
4.3.1. Strategy 37
4.3.2. Management Principles 38
4.3.2.1. Supplier and subcontractor approval 38
4.3.2.2. Critical suppliers 39
4.3.3. Main Indicators 39
4.3.4. Risks 39
4.4. Technological Development. R&D+i in the ACS Group 41
4.4.1. Strategic Priorities 41
4.4.1.1. Construction 42
4.4.1.2. Industrial Services 47
4.4.1.3. Environment 53
4.4.2. Main Indicators 54
4.5. Environment 54
4.5.1. Strategy 54
4.5.2. Management Principles 54
4.5.3. Main Indicators[21] 56
4.5.4. Risks 57
4.5.4.1. Climate Change 57
4.5.4.2. Eco-Efficiency 59
4.5.4.3. Water 62
4.5.4.4. Biodiversity 63

4.5.5. Good Practices 65
5. Employees 68
5.1. The ACS Group's People 68
5.1.1. Strategic Priorities 68
5.1.1.1. Main Figures 68
5.1.2. Management Principles 70
5.1.2.1. Equality, Diversity, Integration, Rights 70
5.1.2.2. Labour Relations 70
5.1.2.3. Turnover and Absenteeism Rate 71
5.1.2.4. Services for Employees, Flexibility and Work/Life Balance 71
5.1.2.5. Development of Human Resources: 72
5.1.2.6. Training Plans[245] 73
5.1.3. Main Indicators 74
5.2. Safety in the Workplace in the ACS Group 75
5.2.1. Strategic Priorities 75
5.2.2. Management Model 75
5.2.2.1. Systems 75
5.2.2.2. Expenditure 76
5.2.2.3. Participation of Workers' Representatives 76
5.2.2.4. Training 77
5.2.2.5. Other Initiatives Related to Health and Safety 77
5.2.2.6. Employee Accident[267] Rate Indices 78
5.2.2.7. Accident Rate Indices for Subcontractors 78
5.2.3. Main Indicators 79
5.3. Social Action in the ACS Group 80
5.3.1. Action Plan on Social Action 80
5.3.2. Social Action in ACS Group companies 82
5.3.3. ACS Foundation 84
5.3.4. Foundation Programmes 85
6. Awards, Recognitions, Memberships 88
7. Principles for the Preparation of the Report 89
8. Scope of the Data 91
8.1. Clients 91

8.2. Quality 91
8.3. Suppliers 92
8.4. R&D+I 93
8.5. Environment 93
8.6. Human Resources 94
8.7. Health and Safety 95
9. Assurance Report 97
10. GRI Index 98
11. We would like to hear your opinion 106

1. Letter from the Chairman

This Corporate Responsibility Report contains the ACS Group's non-financial management policies and the main achievements and initiatives it implemented globally in 2014. With a stable presence in over 70 countries, 210,345 employees and a turnover of €34.881 billion, the ACS Group is a worldwide leader in developing infrastructures through companies that are global operational, technical and organisational leaders. The ACS Group is the leader in markets in the United States, Asia and Australia, and it is the second largest construction company in Latin America and the fourth largest in Europe, in a sector such as infrastructure, which is crucial for the social and economic development of the global economy.

The non-financial management policies detailed in this document provide information on the ACS Group that is broadly demanded by the main stakeholders with whom we work. Attention from investors, clients, employees, suppliers and society as a whole strengthens our commitment to transparency and rigour in defining, controlling and improving our management. This document gives a breakdown of the main indicators used for measuring our performance in terms of ethics, operational efficiency and human resources.

We use a series of tools to manage corporate responsibility that allows us to take on this challenge as a decentralised group, where our companies develop their policies independently based on the markets and stakeholders they work with, but sharing ACS's best practises and corporate culture. The various operational directors are coordinated using Project One, which involves a series of information and control processes that helps us analyse and evaluate the Group's performance and bring it into line with the requirements of the *Dow Jones Sustainability Index*. This process makes it possible for us to periodically incorporate improvements on both a functional and a procedural level in the various ACS companies.

This year I would like to point out the recognition we received for our efforts in developing an efficient, rigorous and universal ethics and professionalism policy that led to us achieving the highest score in the world in the "*Codes of Conduct/Compliance/Corruption&Bribery*" category of the *Dow Jones Sustainability Index*. In this regard we have made a major effort in training in the last three years, with more than 3,500 courses that have been attended by over 46,000 employees in the Group: a key initiative for solidifying our culture of respect, ethics and professionalism in accordance with the ACS Group General Code of Conduct.

One of the indicators in this report that I would like to highlight is our growth in 2014 due to investment in various corporate responsibility functions, which amounted to €397.7 million, or a 2.4% increase over 2013. This amount includes investments in training which are crucial in a company such as ACS with its focus on talent and people, in workplace safety, an area where our efforts in prevention and safety systems grew by 14.9% over the previous year, and investment in quality improvements and R&D+I, which is our commitment to the future by maintaining the highest standards of technical excellence.

Lastly I would like to emphasise that in 2014 we developed a homogenised orderly policy for channelling our efforts in social action, volunteering and philanthropy. In accordance with international standards, the primary goal is to promote the growth of our business and its sustainability, to improve the company's recognition and reputation, and to contribute to the betterment of the society in which the Group operates. In 2014 our companies and the ACS Foundation dedicated over €8.3 million to the initiatives that are covered in this report.

It is my conviction that in 2014 we once again continued to demonstrate our commitment and capacity for leadership in corporate responsibility. In 2015 we expect to continue to foster management policies that are in line with our corporate culture and which efficiently contribute to our growth and profitability. Corporate responsibility is an important part of creating value for our shareholders, motivating our employees and for the satisfaction of both our clients and all of the stakeholders with whom we work.

Florentino Pérez,

Chairman of the ACS Group

2. The ACS Group

2.1. Company Profile

2.1.1. Corporate Strategy

The ACS Group[1] is a worldwide reference in the infrastructure development industry, participating in sectors which are fundamental to the economy. It defines itself as a company committed to economic and social progress in the countries where it is present.

ACS is positioned as a world leader in the infrastructure development industry, with a clear and defined mission:

To pursue global leadership, optimising the profitability of the resources employed and promoting sustainable development

Improving society, generating wealth to guarantee the well-being of the citizens it serves, in the final analysis, is a primordial part of the ACS Group's mission.

The ACS Group's commitment to society is summarised in four fields of action:

- Respect for ethics, integrity and professionalism in the Group's relationship with its Stakeholders.
- Respect for the social, economic and environmental setting.
- Promotion of innovation and research in its application to infrastructure development.
- Creation of employment and well-being, as an economic motor for society.

This performance and all the Group's activities are impregnated with the corporate values ACS has developed over its 30 years of history and form the basis of the actions of all the Group's employees:

- Achieving profitability
- Respecting integrity
- Commitment to their work
- Seeking the client's trust
- Excellence in their professional activities

Profitability and integrity, together with commitment to stakeholders, especially commitment to clients, and operational excellence, are the ACS Group's identifying features.

2.1.2. Description of the ACS Group's Activities

The ACS Group is a worldwide leader in the infrastructure development industry. The company operates in over 70 countries and employs a total of 210,345 employees. Of these, 110,267 work in Spain and the rest – 100,078 – abroad. The five countries with the highest levels of activity are the United States, Australia, Spain, Mexico and Germany.

[1] The parent company of which is ACS, Actividades de Construcción y Servicios, S.A., with registered offices in Madrid, Spain.

In 2014, the year to which this report refers, ACS turned over €34,881 million. This sales figure makes the Group one of the world's biggest construction and services companies[2] by revenue. It recorded a net profit of €717 million and ended the year with an order book of €63,320 million, equivalent to 20 months' activity. At 31 December 2014, the ACS Group recognised equity of €4,898 million and net balance sheet debt of €3,722 million, 2.3% lower than recorded in 2013.

In the Construction area, ACS mainly carries out projects in the fields of civil works, residential and non-residential building, development and management of infrastructure concessions and mining operations. The ACS Group's construction activity is based on the provision of services to third parties, both private and public clients, in countries where ACS has a consolidated local presence or where it carries out infrastructure concession projects. The Construction area had turnover of €25,820 million in 2014 and employed 74,440 people; 35.4% of the total workforce.

In turn, the Industrial Services area provides maintenance and support services to industrial clients, electricity, oil, gas and telecommunications companies. In addition, it carries out turnkey energy and industrial projects for its clients worldwide. This area had turnover of €6,750 million in 2014 and employed 41,272 people; 19.6% of the total employees.

The Environment area focuses its activity on the carrying out of municipal solid waste collection, cleaning and gardening services, as well as the management of large infrastructures for waste treatment and recycling, incinerating and biomethanisation plants and also landfills. Additionally, it offers facility management services for buildings and infrastructures. Net sales totalled €2,338 million in 2014. A total of 94,581 employees participated in its activities; 45.0% of the Group total.

[2] According to ENR in its August publication Top Global Contractors 2014.

2.1.3. The Value of our Businesses

ACS is committed to creating value for all its stakeholders. Providing growing and sustained profitability is one of the company's main objectives.

€M	2013	2014
Net revenue	35,178	34,881
Gross operating profit –EBITDA	2,833	2,466
Gross total investments	2,502	2,310
Net profit	702	717
Net debt	3,811	3,722

Economic value generated, distributed and retained (€M)	2013	2014
Total Income	35,178	34,881
Finance income	362	354
Disposals	2,008	2,623
(1) Economic value generated	**37,548**	**37,857**
Operating and purchasing expenses	25,318	25,276
Staff costs	7,598	7,761
Taxes	425	319
Dividends	398	318
Finance expenses	1,122	1,036
Resources for the community	4	8
(2) Economic value distributed	**34,865**	**34,718**
Economic value retained (1-2)	**2,683**	**3,139**

2.2. The ACS Group and Corporate Responsibility

The ACS has a decentralised structure based around its three areas of: **Construction, Environment and Industrial Services** and it carries out its activities through dozens of different companies. This complex but highly efficient organisation encourages the Group's companies to compete and carry out their work independently, at the same time sharing common guidelines which add value for their clients. Included in this report are the data for the following companies:

Construction	Environment	Industrial Services
Dragados Group[3]	Urbaser Group	Cobra Group[4]
HOCHTIEF[5]	Clece Group[6]	Dragados Industrial Group[7]

Each of the ACS Group's companies is managed autonomously, with independent functional managements and flexible and sovereign executive bodies. The aim of this type of organisation is to promote:

- Profitability
- Decentralisation
- Reduced bureaucracy
- Entrepreneurship
- Competitiveness
- Flexibility and ability to adapt
- Diversity
- Subcontracting of activities

The objective is for all the ACS Group's companies to share the Group's values and culture, at the same time as each operates in a standalone manner, individually contributing numerous valid and profitable management formulas, thanks to the multiple factors involved in their decision making and generating know-how and good practices which are also independent.

Therefore, contributions from a multitude of companies come together in the ACS Group's Sustainability effort, defining its policies for action autonomously and managing their resources in the most efficient manner possible, always covered by a common objective.

[3] Dragados, Vías, TECSA, Geocisa, Drace, POLAQUA, Pulice, Picone, Schiavone, Dragados USA & Canada, Iridium, JF White and Prince Contracting.

[4] Cobra, ETRA, SEMI, MAESSA, IMESAPI.

[5] HOCHTIEF Américas, HOCHTIEF Europe and Leighton. The 2013 and 2014 financial and operational information regarding John Holland and Services in Leighton were restated in 2014, after their sale in December 2014. The data presented in this report has been recalculated based on the employee and turnover figure for Leighton for 2014. On the contrary, for 2013 the historical data published at the 2013 year ended have been considered.

[6] The ACS Group acquired all of the Clece Group's share capital in 2014. The 2012 data do not include information regarding Clece. The 2013 information has been recalculated based on the Clece data. Clece contributed 65,774 employees and sales of €1,219 million in 2013, as well as 68,349 employees and sales of €1,304 million in 2014. (In the financial data, Clece was consolidated during six months in 2014 contributing thus €650 million of revenues).

[7] Dragados Offshore, CYMI, MASA, SICE, INITEC, INTECSA, MAKIBER.

2.2.1. Project one

Project one seeks to promote good management practices and is framed in the Group's general strategy, focused on reinforcing ACS's world leadership. The objective of Project one is to promote the eminently industrial nature of ACS's activities by spreading its corporate culture.

The promotion of good management practices focuses on the following major areas:

- The Group's position in terms of Ethics;
- in terms of Efficiency, involving Client, Quality, Supplier, Environmental and R&D+i policies;
- and in terms of Employees, Personnel, Health and Safety and Social Action policies of the ACS Group.

The process of promoting good practices is divided into two phases implemented every year; a first one in which the Project focuses on the production of a detailed analysis of the position of the Group's different companies in terms of Corporate Responsibility and the on the aforementioned management areas, performing an assessment based on the Dow Jones Sustainability Index.

The second phase is where the implementation of a series of strategies and good practices in each company is recommended. These are a result of the Group's strategic vision, in line with the aforementioned company values and represent an area for substantial improvement.

This process is conducted in a manner which is supervised by independent external consultants and inspectors who qualify the inclusion of improvements periodically, both at the functional and procedural levels.

The results expected from Project one can be summarised as:

- Continuing redefinition of a repository of non-financial, best governance, environmental and social best practices.
- Regular assurance of their implementation in the various Group companies and of the monitoring of their management indicators.
- Aligning the ACS Group with the Dow Jones Sustainability Index, in which the Group appears currently in its European scope.
- The creation of the Corporate Responsibility Report, including a summary of ACS's governance, environmental and social policies.

Hence this document is structured according to the functional analysis and control areas of Project one. The information gathered from the businesses is presented ordered in terms of strategy, management principles, main performance indicators, risks and good practices.

2.2.1.1. Project one: defining material aspects in the CR field

Project one also enables the Corporation to determine the most significant subjects, by weighting information sources, to promote these within the Group in the Corporate Responsibility area. The process involves several steps:

- The repository of good practices the Dow Jones Sustainability Index (DJSI) represents is the first input to the process. Included in Project one are all the initiatives the DJSI identifies as relevant, ordered by importance and weighting.
- Confirmation of the level of applicability and materiality of these good practices takes place with over 140 functional directors and middle managers from all the Group companies. In the Project one information process it is confirmed that the proposed good practices are relevant to the companies and that the monitoring indicators measure them correctly.

2.2.1.2. The ACS Group's Main Management Indicators in CR

Main Management Indicators - Ethics	2013	2014	Objective for 2015
Percentage of total ACS Group employees who have received at least one course in Human Rights, Ethics, Integrity or Conduct during their career with the company (% of total ACS employees)	38%	36%	> 2013
Level of implementation in the ACS Group of regular external audits to confirm the degree of compliance with the Code of Conduct (% of total ACS employees)	33%	41%	N/A
Level of implementation in the ACS Group of contractual clauses on the compliance with the Code of Conduct in contracting with suppliers and subcontractors (% of sales)	90%	91%	> 2013
Level of implementation in the ACS Group of regular external audits to confirm the degree of compliance with the Code of Conduct by suppliers or contractors (% of sales)	17%	23%	N/A
Communications received by the Ethical Channel	27	9	N/A

Main Management Indicators - Clients	2013	2014	Objective for 2015
Number of client satisfaction surveys carried out	2,979	3,134	> 2013
Number of client satisfaction surveys received	1,279	1,338	> 2013
Percentage of client responses of "satisfied" or "very satisfied" over the total number of surveys RECEIVED (%)	86.91%	87.11%	> 2013
Number of complaints received from clients	26,506	34,259	< 2013
Number of complaints dealt with	100.0%	99.9%	= 2013
Number of complaints satisfactorily resolved (proportion of those received)	97%	99%	=/> 2013
Main Management Indicators - Quality	**2013**	**2014**	**Objective for 2015**
Percentage of sales from activities certified under the ISO 9001 standard (%)	71.8%	69.1%	> 2013
Number of Quality audits per million euros of turnover	0.037	0.040	> 2013
Intensity of investment in measures to promote and improve Quality (€ investment per € million of turnover)	123	188	> 2013
Main Management Indicators - Suppliers	**2013**	**2014**	**Objective for 2015**
Analysis of supplier and subcontractor criticality	59.9%	55.7%	> 2013
Inclusion of compliance with the Code of Conduct in supplier and subcontractor contract clauses	90.2%	90.8%	> 2013
Existence of formal systems for supplier and subcontractor approval	95.8%	96.4%	> 2013
Carrying out of internal audits on suppliers and subcontractors	8.2%	15.2%	> 2013
Development of corrective plans for suppliers and subcontractors to improve their performance in economic, social or environmental matters	4.2%	66.2%	> 2013

Main Management Indicators - R&D+i	2013	2014	Objective for 2015
Investment in R&D+i (€ million)	49.4	54.8	> 2013
Level of implementation of a specific R&D+i department	90.3%	91.2%	> 2013
Level of implementation of a formal system for R&D+i management	71.5%	68.9%	> 2013

Main Management Indicators - Environment	2013	2014	Objective for 2015
Percentage of sales covered by ISO14001 Certification	65.7%	63.9%	> 2013
Total Water consumption (m^3)	18,460,840	20,152,730	n.d.
Ratio: m^3 of Water / Sales (€ million)	465.9	566.7	< 2013
Direct emissions (Scope 1) (tCO_2 equiv.)	3,771,674	5,798,392	n.d.
Scope 1 Carbon Intensity Ratio: Emissions / Sales (€ million)	95.2	163.0	< 2013
Indirect emissions (Scope 2) (tCO_2 equiv.)	302,158	463,901	n.d.
Scope 2 Carbon Intensity Ratio: Emissions / Sales (€ million)	7.6	13.0	< 2013
Indirect emissions (Scope 3) (tCO_2 equiv.)	7,103,265	10,718,982	n.d.
Scope 3 Carbon Intensity Ratio: Emissions / Sales (€ million)	179.3	301.4	< 2013
Total Emissions (tCO_2 equiv.)	11,177,096	16,981,275	n.d.
Total Carbon Intensity Ratio: Total Emissions / Sales (€ million)	282.1	477.5	< 2013
Non-hazardous waste sent for management (t)	3,115,431	8,746,743	n.d.
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	78.6	246.0	< 2013
Hazardous waste sent for management (t)	268,137	176,526	n.d.
Ratio: Tonnes of hazardous waste / Sales (€ million)	6.8	5.0	< 2013

The ACS Group environmental information includes data from Leighton. In 2013 it contains information from January 2013 to December 2013 (inclusive), and in 2014 it contains the information for the period from July 2013 to June 2014 (inclusive). The data on this table corresponding to Leighton (for the period from July 2013 to June 2014) are: ISO 14001 (100%), Scope 1 CO_2 Emissions: (5,362,111 tonnes), Scope 2 CO_2 Emissions: (271,610 tonnes), Scope 3 CO_2 Emissions: (2,747,782 tonnes).

At HOCHTIEF in 2014 hazardous and non-hazardous waste amount to 150,363 tonnes and 8,213,595 tonnes respectively. These figures include data from Leighton.

In terms of water consumption reported, an increase has been noted as a result of the international growth of Cobra. Also, figures do not include information from Leighton, as available data consists of estimates based on the cost of the resource. Consumption estimated by Leighton using this method totalled 12.5 million m^3 in 2013 and 37 million m^3 in 2014.

A methodology has been adopted in this report to account for CO_2 emissions in all years under which Urbaser classifies the emissions from water and waste treatment centres as indirect under Scope 3, as it does not own or have operational control over these facilities, as included in the international GHG Protocol (Appendix F) and EPE Protocol (waste sector methodology) standards Urbaser has invoked to calculate its Carbon Footprint. The Public Authorities, as the owners of the facilities, impose the operating requirements, with the management companies limiting themselves to operating them temporarily.

The Scope 3 emissions include calculations for travel by employees. In addition, HOCHTIEF and Leighton include emissions calculated for the Supply Chain (Cement, Wood, Scrap and Steel).

Main Management Indicators - People	2013	2014	Objective for 2015
Percentage days lost through absenteeism	1.4%	1.3%	< 2013
Employees covered by a formal professional development system	87.8%	89.2%	> 2013
Employees in posts defined according to a formal competency map	33.1%	35.4%	> 2013
Employees subject to performance assessment processes	55.5%	51.3%	> 2013
Employees covered by variable remuneration systems	91.3%	91.5%	> 2013
Investment in training per employee (over total employees) (€)	708.0	620.6	> 2013
Percentage of total current Group employees who have received at least one course in Human Rights, Ethics, Integrity or Conduct during their career	38.1%	36.0%	> 2013

Main Management Indicators - Health and Safety	2013	2014	Objective for 2015
Percentage of total employees covered by OSHAS18001 certification	75.4%	82.8%	> 2013
Frequency Rate	19.07	15.18	< 2013
Total number of Accidents with employee time off	7.321	7.801	< 2013
Spending per employee on Safety (€)	768.49	938.31	> 2013
Employees who have received training on Health and Safety matters during their career with the company (%)	94.2%	96.6%	> 2013

2.2.2. The ACS Group and its Stakeholders

The ACS Group defines stakeholders as groups with the capacity to have an influence on the achievement of the organisation's objectives. Outstanding among them are shareholders, employees, clients, suppliers, infrastructure users and society in general, who benefit from its policies in quality, R&D+i, philanthropy and the environment.

To generate trust and identify these groups, a priority is to keep channels open for honest, plural and transparent dialogue in the ACS Group's various companies, as well as in its fields of action and functional areas, something the ACS Group carries out regularly and in a sustained manner and has done for years.

- Shareholders relate to the company daily through the communications channels established, such as the permanently open website, the shareholder services forum, the Investor Relations Department and the Shareholders' Meeting itself, which is held at least once per year. This relationship is detailed in the ACS Shareholders section. The main issues of concern to shareholders are value creation in the company, the details of corporate governance and risk management.
- The employees are key to carrying out the ACS Group's activities, as a company mainly intensive in human resources. The employees' relationship with the company is continuous, but it is especially intense over the performance assessment period, which usually takes place annually. Personnel policies and management are detailed in the corresponding section of this report. They also have the ACS Group's Ethical Channel available, as detailed in the Ethics section. The main areas of concern to employees are talent management and training, career plans and their relevant remuneration, the company's commitment to social action and the sustainability of the business. They also expressed significant concern about the measures taken regarding ethics and professionalism.
- The relationship with clients and suppliers and how ACS deals with their management is part of the Efficiency section of this report. However, the frequency of the ACS Group's relationships with its clients is practically daily, meaning that there are numerous meetings each year. The relationship with suppliers is also fluid as the Group's purchasing directors and works managers hold frequent meetings, and they also come to have daily contact. The primary concerns of clients and suppliers involve confirming the company's levels of technical satisfaction and

development, which should be adapted to their needs or capacities. Managing the risks of executing construction is also an important topic.

– The ACS Group's relationship with society in general and in particular with infrastructure users is detailed in several of the report's chapters dealing with quality, social action and the environment. It should be emphasised that the ACS Foundation holds several meetings each month with organisations in the civil field with the aim of defining its philanthropic activities based on detected trends. Furthermore, the ACS Group's various Environment departments analyse the environmental needs and risks affecting society several times each year and, especially, every time that general plans are dealt with in this subject within the company or Environmental Impact Studies are undertaken.

2.2.2.1. Transparency in Institutional Relationships

The ACS Group is an organisation with a very significant impact on social, labour, economic and political fields in those countries in which it operates. This impact is managed directly by ACS's Chairman, Florentino Pérez, and his team. In this respect, it is important to highlight the influence that ACS has on the decision making or behaviour of those levels and clients with whom it habitually relates.

ACS incorporates responsibility into its whole organisation and its daily practices, sharing knowledge, information and experience. It also carries out projects in collaboration, promotes fair practices, builds alliances with organisations, associations and other sector members, working in a responsible manner and open to dialogue and attending to calls from Government and from the industrial institutions representing its sector.

In short, through its businesses, ACS intervenes in its environment with the intention of contributing voluntarily and actively to social improvement, complying with the law and additionally developing policies and initiatives which boost the excellence and quality of its activities. The ACS Group Chairman is the leading exponent of this policy.

The nature of ACS's political and institutional relationships is augmented by the presence of its Chairman in the most important political and business meetings[8], as well as in various public functions, always guided by the ethical principles of social responsibility and the intention to improve competitiveness and general and added value.

8 The ACS Group made no financial or in kind contributions to political parties during 2014. The Subsidies received by the ACS Group in 2014, as shown in the Group's Consolidated Balance Sheet, included in the Economic/Financial Report published together with this Report, totalled €59.7 million.

2.3. ACS Group Governance

2.3.1. ACS Group Shareholders

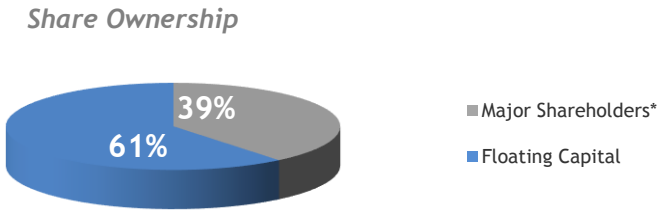
ACS, Actividades de Construcción y Servicios, S.A., (ACS), the ACS Group's parent company, is a Spanish quoted limited company, the share capital of which totalled €157,332,297 at 31 December 2014, represented by 314,664,594 shares, with a face value of €0.50 per share, fully subscribed and paid up, all of a single class and with the same rights.

ACS's shares are represented by means of book entries and admitted to trading in all Spain's Stock Exchanges (Madrid, Barcelona, Bilbao and Valencia). You can access the main data relating to the company's ownership structure in real time through the company's corporate website, www.grupoacs.com, and that of the Spanish Stock Market Commission (C.N.M.V.), www.cnmv.es, as reflected in the following table as at 31 December 2014:

Shareholder's name or corporate name	Number of shares	Percentage of the total number of shares
Corporación Financiera Alba, S.A.	43,682,967	13.88%
Inversiones Vesán, S.A.	39,397,625	12.52%
Iberostar Hoteles y Apartamentos S.L.	17,741,012	5.64%
Mr. Alberto Cortina Alcocer	12,098,318	3.84%
Mr. Alberto Alcocer Torra	10,240,773	3.25%

The information obtained from IBERCLEAR, the Spanish Central Securities Depository, for the call to the company's most recent General Shareholders' Meeting, held on 29 May 2014, showed a total of 48,646 shareholders. There were 42,779 resident minority shareholders, who held 15.4% of the share capital. There were 5,867 non-resident shareholders and domestic institutional shareholders with a remaining stake of 84.6%.

According to the stated data and bearing in mind those shareholders who, with a share of over 4% of the capital, also have representation on the board of directors, the distribution of capital ownership is as follows:



* Representation on the Board.

ACS stock	2012	2013	2014
Closing Price	**€19.04**	**€25.02**	**€28.97**
Appreciation of ACS shares	*-16.86%*	*31.41%*	*15.79%*
Appreciation of the IBEX35	*-4.66%*	*21.42%*	*3.66%*
Maximum closing price	**€25.10**	**€25.02**	**€34.39**
Minimum closing price	**€10.38**	**€16.76**	**€24.97**
Average price over the period	**€16.77**	**€21.11**	**€28.95**
Total volume (thousands)	**227,383**	**201,945**	**252,049**
Average daily volume of shares (thousands)	*888*	*792*	*992*
Turnover (€ million)	**3,812**	**4,248**	**7,376**
Average daily turnover (€ million)	*14.89*	*16.66*	*29.04*
Number of shares (millions)	314.66	314.66	314.66
Capitalisation at the end of the period (million)	**5,991**	**7,873**	**9,116**

ACS is a company committed to generating value for its shareholders, both from the point of view of dividend distribution and share price appreciation. In terms of total shareholder return, an investor who bought one share in ACS on 31 December 1996, just before the creation of ACS in its current form, would have obtained, at the end of 2014, annual profitability of 25.17%. If he or she had invested €100 on that day, at the end of 2014 he or she would have had €5,685, meaning that the investment would have multiplied by 56.85. Total shareholder return includes stock market appreciation and the dividends paid by the ACS Group.

2.3.1.1. Communication with Shareholders

The Group's commitment to the markets, shareholders and investors is upheld in its information transparency. As such, and in order to offer them the best service, the company has specific communications procedures, as detailed in the section on transparency in this document. As a summary, the following stand out among these:

- **Relationship with investors**. A total of 349 meetings were held in different places worldwide. These meetings enable the Group to pass information on its prospects and on relevant events which may affect the company or its sector. Specific events are also held regularly, of which 32 took place in 2014.
- **Shareholder service**. Service is provided from the Investor Relations Department to numerous minority shareholders seeking to resolve doubts and obtain detailed information on their investment. In 2014, 327 calls / emails from shareholders were dealt with.
- **Communications with financial analysts and institutional investors**. Regular sending of information of interest to those analysts and investors who follow the Group most closely.
- Participation in conferences and seminars of interest.
- Corporate Website and start-up of the Shareholder Services Web Forum.

2.3.1.2. Information Transparency

An essential requirement for the ACS Group to be able to fulfil its mission of generating profitability for its shareholders and the society in which it operates is information transparency. The objective of this strategy is to ensure that its activity is as open as possible and that the interests of its clients and the company's other stakeholders are respected. The ACS Group is committed to total rigour in the information transmitted, especially with respect to the media.

This general objective of transparency is stated by means of the following guidelines:

- Transmitting the Company's overall corporate strategies, as well as those specific to each of the Company's business areas, to the outside world.

- Projecting the Group's business reality so that the Group's different stakeholders recognise it as being sound and well-managed in Spain and abroad.
- Contributing to the make-up of a positive corporate image which aids in the achievement of business objectives and in commercial activity.
- Maintaining a fluent relationship with external agents, particularly with representatives of the media.
- All of the above leads to an increase in the value of the ACS brand and of its different companies and businesses.

The ACS Group manages its commitment to transparency towards its stakeholders by three main means:

- The ACS Group's Communications Department.
- The ACS Group Website.
- Shareholder and investor information activities.

The ACS Group's relationship with all forms of media is fluently and transparently led by the Group's Communications Department and involves interviews, press releases and contact on the corporate website, as well as meetings with journalists.

Numerous examples of contact with journalists took place in 2014: 5 press releases were published, several press conferences were held and many individual interviews were given by the Chairman and Corporate General Manager.

The website, www.grupoacs.com, is a commitment from the Group to clarity accessibility and information. Its objectives are specified below:

- To open a "window" to society through which the company may be analysed with greater transparency and ease.
- To maintain a permanently open communication channel both with the Group's priority stakeholders and with any individual or company needing any type of information on the Group.
- To offer, completely transparently, the company's economic and financial information, information on its systems of governance and management and the activities it undertakes.
- To enable searches for historical information on the company for more in-depth analysis of trends and performance.

To maintain up-to-date information on the performance of the company and the criteria behind its management at all times.

www.grupoacs.com	2013	2014
Website visits	**524,149**	**511,516**
Pages viewed	**2,265,282**	**2,281,201**
Unique visitors	**402,805**	**390,872**
Pages per visit	**4**	**4**
Average visit time (mins)	**2.26**	**2.40**
% New visitors	**76.8%**	**75.3%**

Similarly, to aid in their commercial and informational activity, the ACS Group's lead companies and large subsidiaries own and promote a large number of complementary websites and information portals, intranets, on-line tools and remote reporting and training systems.

On the other hand, the shareholders' right to information is detailed in several rules in the regulations of the Shareholders' Meeting. Hence, in order for the Company Shareholders' Meeting to properly serve the function for which it was designed, prior to each Shareholders' Meeting, the Board of Directors makes all the information which is legally required to be provided to shareholders available to them all, in addition to information that is not legally required to be provided, but that reasonably should be made available, given the interests of the company and of the shareholders, for them to form their opinion. In this regard, the Group makes every effort to respond duly to requests formulated by shareholders for the purpose of the General Shareholders' Meeting, regardless of whether these requests are formulated before or after Shareholders' Meetings, provided that the Company's interests are not jeopardised.

The ACS Group uses various channels to fulfil this commitment to communication and transparency. Its objective is to promote flexibility, fairness and immediacy and to achieve greater reach with the published information by means of:

- The Group's website.
- The shareholder service office (+34 91 343 9200).
- The shareholder information e-mail address (irgrupoacs@grupoacs.com).
- The shareholder service web forum.
- Fluid communication with the Spanish Stock Market Commission (CNMV).
- The information offered by the Investor Relations Department.

Furthermore, a Shareholder Service Web Forum has been operating since October 2010 to attend to requests for information resulting from the General Shareholders' Meetings. This tool acts as a support in each period leading up to the General Shareholders' Meeting and will be available to all the Group's shareholders.

In addition, the Spanish Stock Market Commission (CNMV) is the main means through which the ACS Group communicates and announces its development and its main actions. Thirty-seven "Significant Events" were communicated to the Commission during 2014.

The ACS Group publishes standardised financial information and information on the development of its businesses annually and quarterly. Similarly, the company attends to requests for information from other market agents through meetings. These meetings are intended to complement the Group's reporting efforts and the objective thereof is to clarify information already published in accordance with investors' and shareholders' needs.

The measures aimed at promoting information transparency affect the Company's reputation and the dissemination of its corporate values, its technical capacities and its business successes.

2.3.1.3. ACS Governance Structure

It is laid down in the Company's Articles of Association and the Rules of the Board of Directors that ACS will be governed by a Board of Directors made up of a minimum of eleven (11) and a maximum of twenty-one (21) members. ACS's Board Members are named according to a procedure to assess their competences, knowledge, experience and dedication to proper fulfilment of their task, carried out by the Board of Directors' Appointments and Remuneration Committee.

As ACS's decision-making body, it falls to the Shareholders' Meeting, at the proposal of the Board of Directors, both to set the exact number of members of the Board, within these limits, and to name the people to occupy these posts.

The composition of the Board of Directors is based on a proportional principle, by means of which the interests of all ACS's groups of shareholders are represented on the Board. In this way, at 31 December 2014, ACS's Board of Directors was made up of 17 Board Members: 4 executive members, 7 members representing major shareholders, 5 independent members and 1 external member.

The Group promotes all the policies necessary to ensure equality of opportunities and to avoid implicit bias and any discrimination in selection processes not just for members of the Board of Directors, but also for any work position and to guarantee that the applicants meet the competence, knowledge and experience requirements to carry out their work, as stated in point 1.3.1 of the ACS Code of Conduct. As of 31 December 2014, two of the 17 members of the Board of Directors of the ACS Group are women, or 11.8%.

The mission of these independent and external board members is to represent the interests of the free-float capital on the Board of Directors. The Chairman of the Board of Directors, Florentino Pérez, is also the CEO of ACS.

Board Member[9]	Year of birth	Board Member	Year of birth
Florentino Pérez Rodríguez	1947	José María Loizaga Viguri	1936
Antonio Garcia Ferrer	1945	Pedro López Jiménez	1942
Pablo Vallbona Vadell	1942	Emilio García Gallego	1947
Agustín Batuecas Torrego	1949	Santos Martínez-Conde Gutiérrez-Barquín	1955
José Álvaro Cuervo García	1942	Javier Monzón de Cáceres	1956
Manuel Delgado Solís	1948	Miquel Roca i Junyent	1940
Javier Echenique Landiríbar	1951	Maria Soledad Pérez Rodríguez	1943
(Iberostar Hoteles y Apartamentos, S.L) Sabina Fluxá Thienemann	1980	José Luis del Valle Pérez	1950
Joan-David Grimà i Terré	1953		

2.3.1.4. Governance Procedures in ACS

As regards the function of the Board of Directors, this acts jointly and is granted the broadest of powers to represent and govern the company as the body supervising and controlling its activity, but also with the capacity to assume the responsibilities and decision-making powers directly on the management of the businesses.

In particular, the Board of Directors fully reserves the authority to approve the following general policies and strategies:

- Investment and financing policy.
- Definition of the corporate group structure.
- Corporate governance policy.
- Policy for Corporate Responsibility.
- The Strategic or Business Plan, as well as management targets and annual budgets.
- Senior executive management assessment and remuneration policies.
- The risk control and management policy, in addition to the periodic monitoring of internal information and control systems.
- The policy on dividends, as well as on treasury stock and its limits.
- Related-party transactions, except in those cases anticipated by the Regulations.

[9] Personal information on ACS's board members can be found on the ACS Group's website:
http://www.grupoacs.com/index.php/es/c/gobiernocorporativo_consejodeadministracion

For greater efficiency in its functions, a series of Commissions are constituted within the Board of Directors, the task of which consists of controlling and monitoring those areas of greatest importance for good governance of the company. The Board of Directors is currently made up of three commissions: the Executive Commission, the Audit Committee and the Appointments and Remuneration Committee.

The Executive Committee is a delegated committee which can exercise all the Board of Directors' powers except those which cannot be delegated or which the Board reserves as its competence.

The Audit Committee has the main functions detailed in the ACS Group's Corporate Governance Report (Section C.2.3), outstanding among which are the accounting control functions, supervision of compliance with the ACS Group Code of Conduct and risk management, among others.

Finally, the Appointments and Remuneration Committee has the main functions detailed in the ACS Group's Corporate Governance Report (Section C.2.4), outstanding among which are control of board member and senior management remuneration and performance, proposals for their appointments and matters relating to gender diversity on the Board of Directors, among others.

The Board Members' remuneration is defined by a general policy approved by the full Board, heeding the recommendations of the Appointments and Remuneration Committee. The total remuneration of the ACS Group's Board Members in 2014 was €13.44 million, 1.9% of the company's net profit. Within the ACS Group's transparency and information policy, the remuneration received by both the members of the Board of Directors and the Senior Executives during the financial year, both of which are summarised here, is shown in the Annual Corporate Governance Report.

Remuneration to the Board of Directors (€ thousands)	11,396
Value of the overall remuneration corresponding to rights accumulated by the Board Members as regards pensions (€ thousands)	2,047
Overall remuneration to the Board of Directors (€ thousands)	**13,443**
Total remuneration of Senior Executives (52 Executives, € thousands)	**26,153**

The detail of individualised remunerations to the Board of Directors is delivered to the General Shareholders' Meeting in the Annual Remuneration Report, which is also available via the CNMV.

Assessment of the Board of Directors quality and efficiency of performance is a task which falls to the Board itself and cannot be delegated. It is carried out after receiving a report from the Appointments and Remuneration Committee. Furthermore, the General Shareholders' Meeting submits approval of the Board of Directors' management to a vote every year.

Finally, the ACS Group, through the Rules of the ACS Board of Directors, has detailed rules on the mechanisms laid down for detecting, determining and resolving possible conflicts of interest between the company and/or its group and its board members, managers or significant shareholders, as detailed in point D.6 of the ACS Group's Corporate Governance Report.

2.3.1.5. Shareholders Rights and the General Shareholders' Meeting

The operation of the Shareholders' Meeting and the rights of the shareholders are regulated in ACS's Company Articles of Association and in the Rules of the Shareholders' Meeting. According to Article 1 of the latter, the Shareholders' Meeting is the supreme body for the expression of the will of the company and its decision making.

As such, according to these Rules, the Group's shareholders represented in the General Shareholders' Meeting will decide all matters within the Meeting's powers by majority. This meeting will be made up of those holders of at least one hundred shares present or represented, such that holders of less than one hundred shares can group together to reach this number.

In addition, shareholders' attendance and voting rights are laid down in these Rules, by means of which egalitarian treatment is guaranteed for all and a series of measures aimed at encouraging shareholders' participation in the General Meeting are included. As such, not only is delegation or representation of votes permitted during the Meeting, but the possibility of shareholders casting their vote remotely is also expressly established. Furthermore, since the Ordinary General Shareholders' Meeting of 19 May 2005, the necessary procedures have been articulated for exercising the right to vote in advance remotely. The measures adopted by the Group to encourage attendance of the Meeting are positively reflected in their attendance percentages.

Attendance at Shareholders' Meetings	2009 Ordinary	2010 Ordinary	2010 Extraordinary	2011 Ordinary	2012 Ordinary	2013 Ordinary	2014 Ordinary
Shareholders Present	208	213	115	179	216	226	273
Quorum Shareholders Present	7.66%	19.44%	19.93%	20.55%	20.05%	20.19%	7.31%
Shareholders Represented	2,763	2,776	2,183	2,792	2,368	2,214	1.933
Quorum Shareholders Represented	70.88%	58.22%	57.11%	54.41%	51.40%	55.06%	62.89%
Quorum Total	78.54%	77.66%	77.04%	74.96%	71.45%	75.25%	70.2%

Likewise, the shareholders' and investors' rights to information are detailed in several parts of the Rules of the Shareholders' Meeting. Indeed, all the necessary information is made available to the shareholders prior to holding each Meeting, in that, in addition to the standard information provided by the company in the annual, half-yearly or quarterly reports, the Group maintains a website with all the fundamental data on it. Periodic meetings are also held with analysts for this information to reach both shareholders and the general market in the fairest, most symmetrical and efficient way possible.

The ACS Group not only sets up permanent communications channels with its shareholders and investors, but also ensures that all the information made available to them is truthful and rigorous. The Audit Commission reviews this information before it is transmitted to confirm that it is prepared in accordance with the professional principles, criteria and practices with which the accounts are prepared.

ACS's Board of Directors has, over a number of years, also been promoting measures to guarantee the transparency of the company's action in the financial markets and to exercise as many functions as result from its position as a listed company on the stock exchanges. To this effect, we try to ensure that knowledge of significant events is restricted, until made public, to the minimum number of identified people.

2.3.2. Risk Control Systems

The ACS Group's risk control system is based on a range of strategic and operational actions which seek to mitigate risks in addition to fulfilling the objectives set by the Board of Directors. The manager responsible for risk management is Angel García Altozano, Corporate General Manager.

The diversity and complexity of the sectors in which the Group carries out its activities involve a great variety of risks and the Corporation is responsible for defining the basic guidelines to homogenise operating criteria in each of the divisions and so guarantee an appropriate level of internal control. The companies and divisions of which ACS is made up are responsible for developing the necessary internal regulations so as to implement appropriate internal control according to the particular nature of their activity.

In order to be able to respond in the face of global and homogeneous risk, the Corporation has established a risk management model which includes the identification, assessment, classification, valuation, management, correlation analysis and monitoring of risks at the Group and Operating Area levels. Once risks have been located, a risk map is prepared which is systematically updated periodically.

In accordance with that explained above, the following risks have been identified:

- Operational risks, stemming from the Group's different businesses and which vary depending on the area of activity, but which, in short, are related to entering into contracts, planning and control of the execution of the works and projects, quality-related risks, environmental impact and risks related to international activities.
- Non-operational risks, which also stem from the different activities the Group carries out, but which in this case relate to image, human resources, legal or regulatory matters, tax, financial matters and insurance coverage.

As indicated previously, the Group's risk control systems are common to all the Group's areas of activity, but organised according to a decentralised model, which enables each business unit to exercise its risk control and assessment policies in accordance with certain basic principles. These basic principles are the following:

- Definition of the maximum risk limits that may be assumed by each business in accordance with its characteristics and its profitability expectations and which are implemented at the time contracts are entered into.
- Establishment of procedures to identify, approve, analyse, control and report the different risks for each business area.
- Coordination and communication to ensure that each business area's risk policies are consistent with the Group's overall risk strategy.
- Carrying out of sensitivity and stress analyses to confirm these policies and procedures.

The systems provide the necessary information to supervise and evaluate the risk exposure of each business area and develop the corresponding management reports for decision making with monitoring of the appropriate indicators.

- The control systems developed in each business area may be classified into the following categories:
- Management systems for entering into contracts and bidding processes for works and projects.
- Management systems for planning and execution of works and projects.
- Quality management systems.
- Human resources management systems.
- Financial risk control systems.
- Environmental management systems.
- Incorporation of the most advanced technologies as regards environmental matters, such as:
- Conservation of energy and raw materials.
- Using recyclable and biodegradable materials.
- Minimising waste production and environmentally-friendly treatment.
- Promoting the reforestation and landscaping of construction sites.
- Carrying out specific actions for activities that require them, depending on the effect of the impact and the setting.
- Informing the client continuously on the environmental risks and possible preventive measures.
- Other systems: For risks of a legal or fiscal type, ACS has appropriate departments in each company, division or at a corporate level and with prestigious external support in each specific field of action. Additionally, the signing of contracts is supervised by each company's legal adviser and, depending on its relevance, by the legal counsel of the different divisions or of the Group.

The Group has a strategy for covering accidental risks which could affect Group assets and activities that involves the underwriting of various insurance policies for any coverable risks. The characteristics of these policies are reviewed periodically to adapt them to the current and specific status of the risk covered.

3. Ethics

3.1. Ethics and Integrity: Summary, Objectives and General Principles

The ACS Group and the companies which make it up are fully committed to promotion, reinforcement and control in matters related to ethics and integrity, through measures which enable them to prevent, detect and eradicate bad practices.

The ACS Group promotes knowledge of the general principles of conduct, ethics and integrity by all employees, clients, suppliers and contractors.

Integrity is a very important aspect in the ACS Group. In 2011, important measures were promoted from the Board of Directors' Executive Committee to advance these values included in the ACS Group's Code of Conduct. Currently, the ACS Group has equipped itself with two corporate tools: the Code of Conduct and the Ethical Channel, which are widely adopted in the various business areas, and a control system reporting to the Board of Directors, called the Code of Conduct Monitoring Committee.

3.1.1. Ethics and Integrity: Code of Conduct

Since its foundation, the ACS Group and its companies have made a commitment to the various parties forming part of its operations and interacting with the company or its employees. This commitment is based on the ethical principles governing the ACS Group's operations, which shape its corporate culture.

ACS's General Code of Conduct[10] constitutes a guide for the professional performance of all the Group's employees and managers in relation to their daily work, the resources used and the business environment, as well as for all the investee companies in which the ACS Group has control of management.

The basic principles for action in the General Code of Conduct are as follows:

- **Integrity**: the ACS Group promotes recognition of behaviour in accordance with loyalty and good faith, and against corruption and bribery, among its employees.
- **Professionalism**: the ACS Group's employees and management should be recognised for their high professionalism based on proactive and efficient performance focused on excellence, quality and willingness to provide service.
- **Respect for Others and the Environment**: ACS undertakes the commitment to act at all times in accordance with the United Nations Global Compact, to which it has been a signatory since its foundation, the objective of which is the adoption of universal principles in the areas of human and labour rights and the protection of the environment.

All actions taken by the ACS Group and its employees shall maintain scrupulous respect for the Human Rights and Civil Liberties included in the Universal Declaration of Human Rights. The relationship of the Group with its employees, as well as the relationship among employees, therefore, shall be based on the following commitments:

- Prevention of corruption and bribery.
- Equal opportunities
- Non-discrimination
- Confidentiality in information management, when applicable

[10] The ACS Group's Code of Conduct can be seen at http://www.grupoacs.com/index.php/es/c/responsabilidadcorporativ_eticayprofesionalidad

- Avoidance of anti-competitive practices
- Promotion of training and professional and personal development
- Occupational health and safety
- Eradication of child labour
- Reduction of negative impacts on local and indigenous communities
- Channels for appropriate reporting of those inappropriate practices identified (Ethical Channel)

The General Code of Conduct was approved by the ACS Group's Board of Directors in its meeting of 15 March 2007 and modified by agreement of the Board of Directors' Executive Committee of 30 August 2011.

3.1.2. Management Principles

3.1.2.1. Field of action and scope of the Code of Conduct

The General Code of Conduct and the procedures laid down for disseminating and safeguarding it are basic elements in the Group's integrity framework. In this respect, the General Code of Conduct has been extended to the whole organisation:

- The Code applies to all members of management bodies and to all employees of Group companies, regardless of the contractual form determining their labour relationship, the post they occupy or the place in which they carry out their work. They are all obliged to know and comply with the General Code of Conduct and collaborate in its implementation in the Group. Additionally, the ACS Group's management team shall make the necessary means available to such companies to fulfil the regulations contained in the General Code of Conduct.
- The scope of application of the Code may be extended contractually to any other individual or legal entity with commercial or business relations with the ACS Group when, due to the nature of that relationship, its activities could affect the ACS Group's image and reputation.
- The scopes of application contained in this Code affect all companies which form a part of the ACS Group due to the latter having control over their management. Although the Hochtief Group became fully consolidated in the ACS Group as of 1 June 2011, both the Hochtief Group's parent company, Hochtief AG, and the parent company of its Leighton subgroup, Leighton Holdings Limited, are companies quoted on the German and Sydney stock exchanges, respectively, hence they are subject to their own regulatory bodies' rules and have both their own Codes of Conduct and their own internal channels for complaints and control, under similar terms to those of the ACS Group. For this reason, the ACS Group's General Code of Conduct does not apply to investee companies belonging to the Hochtief Group and the Leighton Group.

All ACS Group companies adhere to the Code of Conduct. In addition, companies representing 86.8% of ACS Group employees have developed initiatives to expand the precepts of the Code of Conduct as a consequence of the needs they have detected resulting from their type of business, their presence in countries or geographical areas with additional risks or as a consequence of additional legal requirements.

3.1.2.2. Actions to promote good ethical practices

The ACS Group understands due diligence as the set of activities carried out and aimed at minimising the possibility of bad practices arising in the Group as regards ethics and integrity. The ACS Group understands that the following are necessary for this:

- Allocation of responsibilities as regards supervision of the company's performance in this field This responsibility falls to the Code of Conduct Monitoring Committee, reporting to the Board of Directors
- Establishing procedures which enable the prevention, detection, notification and eradication of bad practices in this field In this regard, specific initiatives are defined in Group companies were additional risks (operational, geographical or mixed) are detected, to expand on the Code of Conduct at the same time as promoting training in fields related to Ethics and encouraging use of the Ethical Channel.

- The knowledge and understanding by the company's people of what is expected of them in relation to ethics and integrity. Companies representing 87.0% of Group employees report the existence of a specific training plan in matters of Human Rights, Ethics and Integrity and Conduct. A total of 845 training courses, attended by 17,105 employees, were given in this field in ACS in 2014. Indeed, the level of penetration of training in terms of Human Rights, Ethics and Integrity and Conduct has reached 36.0% of the Group's total number of employees. Each trained employee received an average of three hours of training during the year.
- The adoption of good practices has begun to be promoted relating to performance assessment in terms of Ethics and variable remuneration according to parameters related to the control of Ethical risks. As such, formal, documented commitments to the Universal Declaration of Human Rights are included in companies representing 86.9% of ACS employees. Additionally, compliance with the precepts of the Code of Conduct is confirmed in 41.2% of employee performance assessments.
- Establishing commitments which make clear the behaviour expected of the people who make up the company. An outstanding cultural characteristic in compliance terms in the ACS Group is the adoption of "Zero Tolerance" policies to breaches in this field. Companies representing 98.9% of Group employees report the existence of such a policy.
- Supervision and monitoring of the whole process by means of audits or inspections by independent companies. Companies representing 41.1% of Group employees perform periodic (annual or at least biennial) independent external audits.
- Promotion and monitoring of ethical standards in suppliers and subcontractors. ACS Group companies representing 91% of sales explicitly include compliance with the ACS Code of Conduct in the contracts they sign with Suppliers and Subcontractors. Furthermore, 23% internally or externally verify such compliance. Companies representing 76% of ACS's sales promote and positively assess their suppliers' adherence to international standards such as the Global Compact, UN and ILO conventions, etc.
- In terms of avoiding monopoly practices, the ACS Group sets itself against such practices, through its Code of Conduct, and assesses annually the level of risk this aspect represents. In 2014, the Group's Contract managers reported that anti-monopoly policies were developed in companies representing 33.5% of total turnover. Leighton, in turn, published a detailed antitrust policy as part of its Code of Conduct, affecting 32% of ACS Group sales. This policy can be found on its website.

The final aim of ACS's actions with regards to ethics and integrity is the establishment of a framework for action which stimulates everyone to execute their responsibilities in an upright, responsible and transparent manner.

3.1.2.3. General Code of Conduct Monitoring Committee

Since its foundation, the ACS Group and its companies have made a commitment to the various parties forming part of its operations and interacting with the company or its employees. This commitment is based on the ethical principles governing the ACS Group's operations, which shape its corporate culture: integrity, professionalism and respect.

The ACS Group's General Code of Conduct summarises these basic principles of ethics and integrity and guides the action of its employees and managers in the performance of their daily work, with the due diligence in terms both of the resources used and of the corporate environment in which it takes place. The Code applies to all investee companies in which the ACS Group has control over management.

Although the Hochtief Group is fully consolidated in the ACS Group, both the Hochtief Group's parent company, Hochtief AG, and the parent company of its Leighton subgroup, Leighton Holdings Limited, are companies quoted on the German and Sydney stock exchanges, respectively, hence they are subject to their own regulatory bodies' rules and have both their own Codes of Conduct and their own internal channels for complaints and control, under similar terms to those of the ACS Group. For this reason, the ACS Group's General Code of Conduct does not directly apply to investee companies belonging to the Hochtief Group and the Leighton Group.

In the case of Hochtief, the Group has its own Code of Conduct which covers the ethical principles on which the company's business is based. Compliance with this Code is mandatory for all its employees and managers.

In the case of Leighton Holdings, a set of 12 internal codes covering Group commitment to compliance with standards in terms of good corporate governance, high ethical standards and excellence in service go under the name of “Group Policies”.

If the ACS Group’s parent company receives formal complaints relating to the actions of members of the Hochtief Group or its subgroup, Leighton, it would inform the complaining party of the internal complaints mechanisms, in each case, and would consider the complaint to have been transferred to the body or management area responsible in each of these subgroups.

The General Code of Conduct applies to all members of management bodies and to all employees of Group companies, regardless of the contractual form determining their labour relationship, the post they occupy or the place in which they carry out their work.

They are all obliged to know and comply with the General Code of Conduct and collaborate in its implementation in the Group. It is the responsibility of the ACS Group’s management team to make the necessary means available to them to have them comply with the rules contained in the Code.

The scope of application of the Code may be extended contractually to any other individual or legal entity with commercial or business relations with the ACS Group when, due to the nature of that relationship, its activities could affect the ACS Group’s image and reputation.

The objective of the General Code of Conduct Monitoring Committee is to ensure compliance with the General Code of Conduct and to resolve incidents or doubts about its interpretation, adopting all the necessary measures to achieve this. Specifically, the Committee has been assigned the following functions:

- Promoting the dissemination, knowledge of and compliance with the code in each and every Group company.
- Establishing the appropriate communications channels to ensure that any employee can seek or provide information regarding compliance with this code, ensuring the confidentiality of complaints processed at all times.
- Interpreting the regulations derived from the Code and supervising their implementation.
- Ensuring the accuracy and fairness of any proceedings commenced, as well as the rights of persons allegedly involved in possible breaches.
- Defining the cases in which the scope of the Code should be extended to third parties that are to have business or trade relations or with the ACS Group.
- Gathering data on levels of compliance with the Code and disclosing the specific related indicators.
- Preparing an annual report on its actions, making the recommendations it deems appropriate to the Board of Directors through the Audit Committee.

3.1.2.4. Ethical Channel

The main tool available to the Monitoring Committee is the Ethical Channel, created in September 2011, enabling anyone to notify of irregular conduct in any of the companies making up the ACS Group or any non-compliance with the standards included in the General Code of Conduct, through:

- the e-mail address: **canaletico@grupoacs.com**
- or the postal address: **Canal Ético, Grupo ACS, Avenida Pío XII, 102. 28036 Madrid, Spain.**

The Ethical Channel is both a route for denouncing breaches of the rules in the ACS Group’s General Code of Conduct and a means for resolving doubts which may be raised on applying the General Code of Conduct.

Based on Opinion 1/2006 issued by the Working Party created by Article 29 of Directive 95/46/EC – on the application of EU data protection rules to internal whistleblowing schemes in the fields of accounting, internal accounting controls, auditing matters, fight against bribery, banking and financial crime – the Spanish Data Protection Agency (Agencia Española de Protección de Datos - AEPD) laid down, by means of Legal Report 0128/2007, the characteristics with which

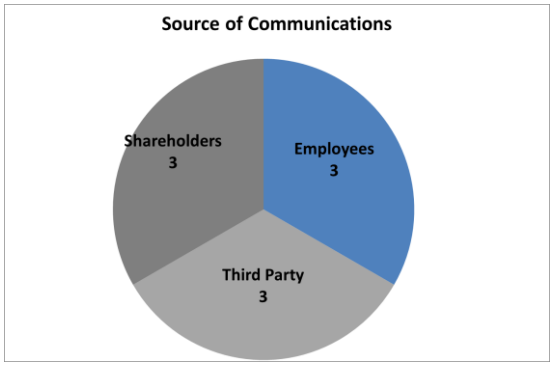
all internal whistleblowing systems must comply in accordance with that set forth in Spanish Organic Law 15/1999, of 13 December, concerning the Protection of Data of a Personal Nature and the regulations which develop it.

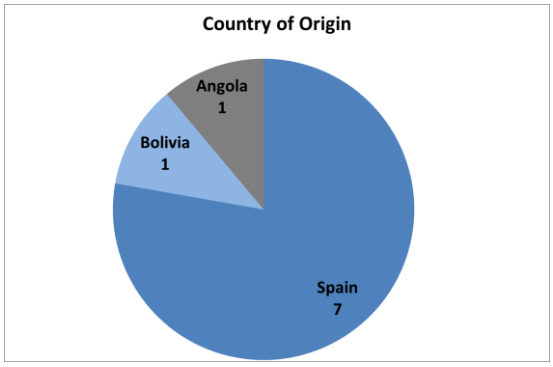
Following the AEPD guidelines, the Monitoring Committee laid down the regulation for the internal system for denouncing breaches, implemented by the ACS Group through the Ethical Channel:

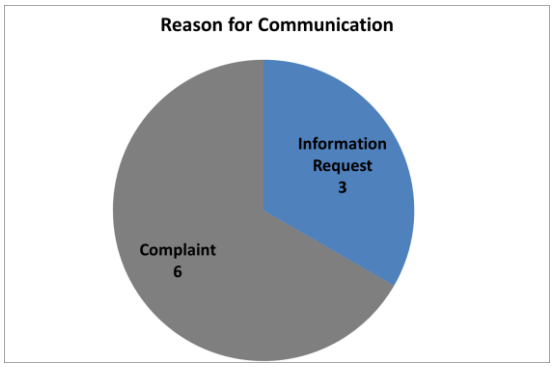
- Accusations will only be accepted in which the whistle blower is identified, so preventing the existence of anonymous accusations.
- The whistle blowers and accused parties who use the internal whistleblowing system shall be people with a link to the company under employment, civil or commercial law, thus the internal whistleblowing system cannot be made available to third parties, even if they have a legitimate interest.
- Users – potential whistle blowers and accused parties – shall be expressly informed of the existence and operation of an internal whistleblowing system and its existence shall be incorporated in the contractual relationship.
- The accusations shall refer to internal or external matters or standards which involve non-compliance with the employment or contractual duties of the accused party or events which could result in criminal liability for the accused party or the company, based on regulations on money laundering and the reform to the criminal code which establishes criminal liability for legal entities.
- The accusation system will guarantee that the identity of the whistle blower remains confidential throughout all the stages of processing, making it impossible for it to be revealed to the accused party, and the whistle blower must be informed of the following circumstances:
    - His or her identity will be kept confidential throughout all the stages of the process.
    - His or her identity will not be disclosed to third parties, nor the accused person, nor the employee's managers, except if its disclosure to the relevant people involved is necessary in any subsequent investigation or legal proceedings initiated as a result of the investigation carried out by the internal whistleblowing system.
- The internal whistleblowing system must set a maximum period for holding the data related to the accusations, this being limited to that needed for the processing of the necessary internal auditing measures and, as a maximum, to the processing of the legal procedures resulting from the investigation carried out.
  As indicated in the latest Biennial Internal Audit of files with data of a personal nature, of March 2015, the Security Document sets a period of one year for holding data related to the accusations, to be extended if necessary either for processing internal auditing measures or for the arbitration or legal proceeding deriving from the investigation carried out.
- The accused party shall be notified, as soon as possible, of the following circumstances:
    - The body responsible for the whistleblowing system.
    - Of what he or she is accused.
    - The departments and offices which may receive the report within the company.
    - How the accused party can exercise his or her rights of access and correction.
- Only in cases where the company's capacity may be put at risk may the duty of informing the accused party be delayed. This delay may not, under any circumstances, exceed three months to be counted from the time that the accusation was made.
- The high level file shall be registered in the General Data Protection Register.
- The high level security measures laid down in Spanish Royal Decree 1720/2007, of 21 December, approving the Regulations developing the Organic Law on Data Protection must be implemented.

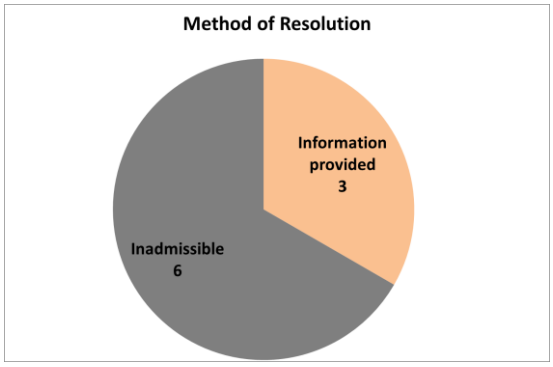
In adherence to all the above, the appropriate registration in the Spanish Data Protection Agency was requested and the latter registered the handling in the General Data Protection Register on 16 February 2012.

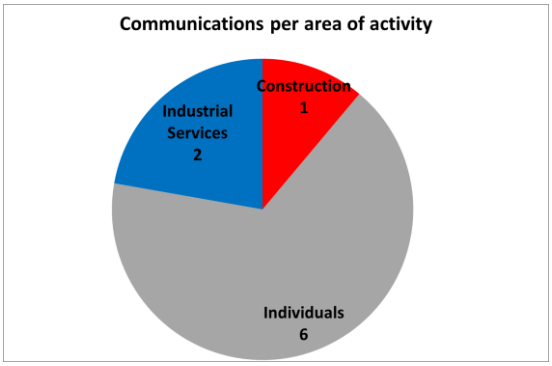
A total of nine communications were received in 2014, all via digital channels. The details of the communications received are as follows:


Source of Communications
Shareholders
3
Employees
3
Third Party
3


Country of Origin
Angola
1
Bolivia
1
Spain
7


Reason for Communication
Information
Request
3
Complaint
6


Method of Resolution
Information
provided
3
Inadmissible
6



3.1.3. Management Indicators

In terms of Ethics, the ACS Group has established that the following management indicators are material, measurable, relevant and representative of the function analysed and form a part of the process for universal application of the good practices developed by Project one.

Main Management Indicators - Ethics	2012	2013	2014	Objective for 2015
Percentage of total ACS Group employees who have received at least one course in Human Rights, Ethics, Integrity or Conduct during their career with the company (% of total ACS employees)	9%	38%	36%	> 2013
Level of implementation in the ACS Group of regular external audits to confirm the degree of compliance with the Code of Conduct (% of total ACS employees)	N/A	33%	41%	N/A
Level of implementation in the ACS Group of contractual clauses on the compliance with the Code of Conduct in contracting with suppliers and subcontractors (% of sales)	83%	90%	91%	> 2013
Level of implementation in the ACS Group of regular external audits to confirm the degree of compliance with the Code of Conduct by suppliers or contractors (% of sales)	35%	17%	23%	N/A
Communications received by the Ethical Channel	11	27	9	N/A

3.1.4. Risks

Several main risk areas have been identified as material for the ACS Group in terms of Ethics. The ACS Group has developed specific means for measuring, counteracting, controlling or eliminating these risks.

- Risk in terms of bribery and corruption. Companies representing 41.1% of the ACS Group perform periodic audits on the level of implementation of the ACS Group Code of Conduct, which is the main tool for opposing this risk. Furthermore, 41.2% of Group employees specifically deal with compliance with subjects related to the Code of Conduct in their performance assessments.
- Risk in terms of forced labour or child labour. Companies representing 83.0% of Group employees have developed protocols or policies to minimise this risk, which they have identified as material.
- Risks in terms of respect for rights of association or union representation. Companies representing 74.6% of Group employees have developed protocols or policies to minimise this risk, which they have identified as material.
- Risk in terms of discrimination/equality. Companies representing 57.0% of Group companies have formal programmes to ensure equality of opportunities among workers. In 2014, 22 incidents of discrimination were reported.
- Risks deriving from the activity of contractors and suppliers. As detailed in the previous point on actions to promote good ethical practices, the Group implements several initiatives to reduce the risks resulting from

contracting suppliers and subcontractors. Of all these, Group companies consider 0.1% present risks in social matters.

4. Efficiency

The ACS Group has identified a series of non-financial functional areas which are key to carrying out its business, forming part of the production process and with which it generates a significant part of its profitability and productivity in its operating companies. These are the areas of Clients and Contracting, Quality, the Environment, Suppliers and R&D+i.

These functional areas exist in all the Group companies and they have heads who are responsible for collaborating in preparing this report annually. These are the people responsible for defining the main policies for controlling and reducing costs and promoting and achieving Group revenue.

4.1. Clients and Contracting

4.1.1. Strategy

The commitment to clients is one of the ACS Group's most important corporate values. Not for nothing is there a high level of trust between the client and the Group, thanks to the high added value services the company offers throughout time, promoting this close relationship.

This commitment to its clients is tackled from a clear strategy based around the following points:

- Problem-solving orientation
- Client relationship feedback
- Information on the ACS Group's capabilities
- Identification of future needs and opportunities for collaboration

In addition, the ACS Group seeks appropriate solutions to improve its approach to the client, particularly in technological matters of importance. This leads to the search for collaboration with detail engineering companies, specialised in the specific field required for each project. The most suitable alliances are created for each case in this way and, as such, the final client can be offered the best technical and economic solution.

Another important value for the Group's businesses is confidentiality. ACS Group companies' contracting and client relationship departments carry out periodic initiatives to promote responsible use of information, so guaranteeing client confidentiality.

4.1.2. Management Principles

Given the characteristics of ACS's business, where large infrastructure projects are carried out or general agreements are entered into for the provision of services (such as the cleaning of a city or maintenance of an electricity grid), the number of clients with whom ACS deals is very limited or they are large corporations or public institutions from around the world.

In 2014, companies representing 33.0% of ACS Group[11] sales reported the existence of a client management system, managed by each company's contracting department. The management aspects common to the whole ACS Group are as follows:

- Monitoring of client needs
- Periodic measurement of client satisfaction
- Promotion of commercial activity

[11] The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2014.

4.1.2.1. Monitoring and Communication

The ACS Group companies hold regular meetings with clients, through those responsible for each project, or continuously if, as occurs in exceptional projects, the client dedicates resources to production control.

This is how objectives, monitoring systems and client information plans are defined for each project and in line with the specific aspects of each company. Control points for important phases of production are established in these plans, along with certification meetings to manage the partial payments for the work and partial monitoring points which may come to mean daily contact between the supervisor and the client in order to reinforce the latter's confidence.

Similarly, computerised CRM systems are being implemented to collect information relating to clients, in order to facilitate analysis and the carrying out of actions to improve satisfaction. In 2014, companies representing 10.1% of ACS Group sales had a system of this type in operation.

4.1.2.2. Client Satisfaction

ACS's second key client relationship management policy is the measurement of their satisfaction. Companies representing 23.4% of ACS Group sales carry out this type of process, either in a standalone form or within the framework of quality management systems. Furthermore, Group companies representing 23.7% of sales implement measures and plans to improve client satisfaction.

A study was carried out on the aspects rated best and worst by the clients. Worthy of highlighting among the best rated are:

- The proactivity shown by Group companies to resolve problems and unforeseen events
- The qualifications, experience and technical quality of the Group's teams
- The existence of a detailed, structured and exhaustive client needs monitoring process

Outstanding among the worst rated are:

- The works delivery periods and the delays which occur on occasions
- The difficulty in controlling the agents involved in the project, such as subcontractors and suppliers
- The perception of price against the quality of the products

Companies representing 55.7% of ACS sales have developed channels and processes to enable clients to formalise their complaints and claims.

4.1.3. Main Indicators

Main Management Indicators - Clients	2012	2013	2014	Objective for 2015
Number of client satisfaction surveys carried out	1,290	2,979	3,134	> 2013
Number of client satisfaction surveys received	860	1,279	1,338	> 2013
Percentage of client responses of "satisfied" or "very satisfied" over the total number of surveys RECEIVED (%)	86.23%	86.91%	87.11%	> 2013
Number of complaints received from clients	2,839	26,506	34,259	< 2013
Number of complaints dealt with	98.8%	100.0%	99.9%	= 2013
Number of complaints satisfactorily resolved (proportion of those received)	85%	97%	99%	=/> 2013

4.1.4. Risks

In specific terms related to sustainability:

- 21.1% of tenders presented to clients include an environmental impact analysis

- 7.2% of tenders to clients include a detailed information section on the ACS Group's Corporate Responsibility policies
- Furthermore, companies representing 34.7% of ACS's sales report that they respond to the comments and suggestions from their clients in order to improve their operations.

4.2. Quality

4.2.1. Strategy

Quality is a determining factor for the ACS Group, as it represents the factor distinguishing it from the competition in the infrastructure and services industry, with high technical sophistication.

The Quality Department in the Group's different companies is the entity responsible for implementing their own Quality Management Systems. Companies representing 72.0% of ACS Group sales[12] presented some form of quality management system in 2014. In this period and as a consequence of these systems, the ACS Group invested a total of €6.7 million in promoting quality, representing a 37.0% increase over the amount recorded for the previous year.

These quality systems are audited regularly in order to certify Group activities, mainly according to the ISO 9001 standard, held by companies representing 69.1% of the Group's sales.

Production certified under ISO 9001	2012	2013	2014
Construction	67.1%	65.6%	61.2%
Industrial Services	92.0%	93.5%	94.2%
Environment	89.2%	81.7%	81.2%
ACS Group	**72.5%**	**71.8%**	**69.1%**

4.2.2. Management Principles

Each company in the group adapts its needs to the specific characteristics of its type of production, but a series of common lines of action have been identified within their Quality Management Systems:

- **Objectives** are set periodically as regards quality and their fulfilment is assessed.
- **Initiatives and actions** are carried out aimed at improving the quality of the services provided.
- Specific actions are carried out in **collaboration with suppliers and subcontractors** to improve quality.

The quality management for the ACS Group's various companies sets general quality objectives for the following financial year. In 2014, companies representing 72.8% of ACS Group sales defined formal objectives in this respect.

According to its characteristics, each project or work adopts the general objectives applicable to it, which generally focus on obtaining, renewing or expanding quality certifications, especially when a Group company develops a new technique or expands its activity into a new geographical area.

[12] The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2014.

At the same time, another common aspiration is to minimise incidents through quantifiable improvement activities, as well as to obtain information relating to clients.

The most important objectives reported by the ACS Group's companies can be summarised in the following overall framework:

- Obtaining and expanding the scope of certifications.
- Implementing tools to improve quality.
- Improving specific performance indicators.
- Improving the training of supervisors, operators and works managers.
- Increasing client satisfaction indices, reducing complaints due to problems in execution.
- Meeting delivery schedules globally and with maximum quality.
- Increasing the number and capacity of internal quality auditors.

The concern with quality in all the group's companies reflects not only the effort to achieve the objectives set, but also the specific actions by the companies. A significant percentage of the Group's companies carry out quality improvement actions. According to the reported data, companies representing 60.2% of ACS Group sales carried out at least one initiative of this type in 2014.

4.2.3. Main Indicators

Main Management Indicators - Quality	2012	2013	2014	Objective for 2015
Percentage of sales from activities certified under the ISO 9001 standard (%)	72.5%	71.8%	69.1%	> 2013
Number of Quality audits per million euros of turnover	0.041	0.037	0.040	> 2013
Intensity of investment in measures to promote and improve Quality (€ investment per € million of turnover)	348	123	188	> 2013

4.2.4. Risks

Control of the implementation of quality standards in a decentralised company like ACS, with thousands of work centres / works / projects worldwide, is a key task which seeks to reduce the risks to its reputation and operational risks of faults in quality terms.

To achieve this, periodic inspections are carried out to check compliance with quality standards, as shown by the fact that companies representing 73.2% of ACS Group sales carry out regular inspections to check quality. Additionally, in 2014 a total of 1,414 quality audits were carried out.

To a great extent, ACS Group companies carry out a large part of their activities by means of the use of services from suppliers and subcontractors, who collaborate to a significant degree in project execution. In order to guarantee an appropriate level of quality in the provision of services from suppliers and contractors, companies representing 73.2% of ACS Group sales include clauses in contracts demanding a guarantee of a minimum level of quality, which generally depends on the supplier or subcontractor having certification to ISO 9001, among other measures.

Furthermore, as will be seen later in the section on suppliers, the purchasing and supplier contracting departments, together with quality departments, carry out official approval processes and monitoring and audits of performance in terms of supplier quality once the works or contracts for service provision are complete. This permits the proposal of corrective

measures if areas for improvement are found or may even lead to cessation of collaboration with the supplier or subcontractor in future projects.

4.3. Suppliers:

4.3.1. Strategy

In Group companies, the purchasing department manages the relationship with suppliers[13] and contractors by means of specific systems for managing, classifying and approving them and controlling risks.

As a characteristic differentiating the Group from its competitors, it is important to highlight the distinct decentralisation of purchasing and supplier management departments in this area. There are a variety of systems in ACS in this aspect, which vary according to operating company needs. From a central, reference, corporate department, which defines policies and prices, to the most complete decentralisation where the works managers themselves define their needs and meet them using a common, widespread policy.

Furthermore, Group companies face three different types of suppliers or subcontractors:

- Suppliers of materials and/or services defined by the client.
- Suppliers of services or subcontractors contracted by the ACS Group.
- Materials suppliers contracted by the ACS Group.

In the first case, in which an ACS Group company carries out a project in which the client defines the type of suppliers contractually, as well as the quantity and characteristics of the materials to be used, the Group companies, in general, obey these requirements. Even so, the ACS Group's purchasing and suppliers departments have a control procedure established to verify the efficiency of the supplier designated by the client.

This contracting format, in which ACS has very little capability for managing the suppliers, is not watertight as, as mentioned in the section on clients in this report, the Company carries out feedback actions with the client. This means that, in cases in which the suppliers defined by the client have given problems or presented areas for improvement, the client will be notified of these and corrective measures will be promoted.

It is worth highlighting that, once the special features of the different markets in which the ACS Group is present have been considered, specific purchasing procedures are developed when necessary to increase competitiveness.

For suppliers of services and materials contracted by the ACS Group, whether through a central purchasing department or in a decentralised manner by works managers, detailed management and control processes are defined, which share the following points in common in all Group companies:

- There are specific standards and a system for management, classification and approval of suppliers and subcontractors and risk control.
- The level of compliance with these systems is assessed.
- Collaboration with suppliers and transparency in contractual relationships are promoted.
- The purchasing system supports suppliers in driving a broad policy in its comparison which promotes the participation of various suppliers in selection processes. Given that the works managers tend to use the same suppliers, a study of common suppliers has been started to put decisions into objective terms and give access to new suppliers in different parts of the world.
- Visible purchasing portals for all services are being developed, offering a wide range of products from different suppliers. This is a real aid to cost saving (because the most competitive prices are identified) and to controlling

[13] The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2014.

material consumption by employees or works managers. In Spain this portal helps local suppliers to sell their products domestically, promoting their development and growth.

4.3.2. Management Principles

4.3.2.1. Supplier and subcontractor approval

Companies representing 96.4% of ACS Group have a formal system for approving suppliers and subcontractors, in line with a series of clearly established criteria, which is subsequently used by the project works managers and provides them with information on the suitability or otherwise of a supplier to fulfil the anticipated task. The main concepts used for approving suppliers, both in the formal systems and informally are:

- Cost, payment and collection term, experience, professional prestige and technical capability
- History of fulfilment of contractual clauses in their prior relationship with ACS
- Additional non-financial criteria (see table attached)

Level of implementation of non-financial criteria in supplier approval (% of ACS Group sales)	2012	2013	2014
Adherence to the ACS Group Code of Conduct	82.7%	90.2%	90.8%
Adherence to international standards as regards human rights and labour rights	67.1%	76.6%	76.0%
Adherence to standards for fulfilment of commitments in ethical, social and environmental matters	67.1%	76.6%	76.0%
Certification in quality aspects (ISO9001)	67.1%	30.0%	96.6%
Certification in environmental aspects (ISO14001, EMAS or similar)	67.1%	95.0%	97.1%
Analysis of labour standards and practices of suppliers and subcontractors	71.2%	77.8%	81.6%

Additionally, companies representing 66.6% of ACS sales specifically promote the use of recycled and/or certified construction materials in the supplier approval process, offering the client this type of option when the type of procurement is decided. The table attached shows the materials covered by these initiatives, their level of consumption and the total percentage of Group clients which decided to use recycled or certified sources.

Procurements	2013	2014
Percentage of certified wood	1.0%	1.0%
Total wood purchased (m^3)	840,828.1	1,249,717.1
Percentage of recycled steel	7.8%	37.4%
Total steel purchased (m^3)	1.031.686,1	1,178,659.9
Percentage of concrete with recycled aggregate	0.1%	0.1%
Total cement / concrete purchased (m^3)	8,378,955.1	14,741,069.0
Percentage of recycled glass	100.0%	99.4%
Total glass purchased (m2)	2,880,152.9	2,896,348.3

Within the approval system, an after the fact analysis is carried out on suppliers. This process feeds back into the approval system. This system, which seeks to guarantee compliance with contractual clauses and agreements, is based fundamentally on detection and on corrective measures or management of non-compliance.

In the case of the initiatives for detection and control, the policy is based on regular audits, both internal and independent. In this case, companies representing 15.2% of ACS Group sales report carrying out internal audits of suppliers (affecting and average of 0.8% of suppliers) and 17.0% report that they carry out independent audits (affecting an average of 1.9% of suppliers). Specifically, compliance with the ACS Group Code of Conduct by suppliers is verified internally or externally in companies representing 23.0% of Group sales.

- The corrective measures taken in cases of poor performance are adapted taking the following circumstances into account:
- If it is a critical supplier for the company, the reasons for the negative assessment are analysed and initiatives proposed to strengthen the identified areas for improvement including, among others, training and collaboration activities.
- If the company is not critical for the company, it is classified as not approved in the database.
- Companies representing 97.2% of ACS Group sales immediately cancel contracts or relationship agreements with suppliers if breaches occur in clauses related to performance.

4.3.2.2. Critical suppliers

Companies representing 55.7% of ACS Group sales have carried out an analysis to identify whether they have critical suppliers. Specifically, a supplier is defined as critical when it concentrates a significantly higher percentage of procurement or subcontracting costs than the average for the rest of the company's suppliers.

As a result of this analysis, and due to the characteristics of its business, it has been found that in several of the ACS Group's main companies, the suppliers are highly atomised, geographically dispersed and do not reach the critical mass to be determined as critical. On the contrary, in companies representing 87.1% of Group sales, such critical suppliers have been detected.

In these companies, the main data from the analysis of critical suppliers are as follows:

- 26.2% of the suppliers to these companies are covered by this analysis.
- Of these, 15.1% are considered critical suppliers.
- These suppliers represent 47.7% of the total costs for Group companies with critical suppliers.
- Almost all these suppliers consider ACS to be a key client to their business.

4.3.3. Main Indicators

Main Management Indicators - Suppliers	2012	2013	2014	Objective for 2015
Analysis of supplier and subcontractor criticality	49.6%	59.9%	55.7%	> 2013
Inclusion of compliance with the Code of Conduct in supplier and subcontractor contract clauses	82.7%	90.2%	90.8%	> 2013
Existence of formal systems for supplier and subcontractor approval	47.3%	95.8%	96.4%	> 2013
Carrying out of internal audits on suppliers and subcontractors	6.6%	8.2%	15.2%	> 2013
Development of corrective plans for suppliers and subcontractors to improve their performance in economic, social or environmental matters	54.0%	4.2%	66.2%	> 2013

4.3.4. Risks

Three types of main risk have been identified in Group company activities with their suppliers: economic, social and environmental risks. As a result of monitoring and measuring these risks, it has been found that, on average, 1.0% of Group suppliers represent high risks in economic terms (solvency, delivery dates), 0.1% in social terms (human rights,

forced labour, health and safety risks) and 0.3% in environmental terms (lack of environmental certification). In this latter case, additionally, companies representing 9.3% of Group sales are carrying out a carbon footprint analysis on their suppliers.

To minimise these risks, the Group companies implement the following initiatives:

- Corrective plans are developed in suppliers to improve their economic, social or environmental performance in companies representing 66.2% of ACS Group sales.
- Companies representing 74.5% of Group sales report proactive collaboration initiatives with suppliers. The main activities for collaboration are based on training which, generally, is made up of courses in various subjects such as quality, the environment, safety and the execution of works.
- In companies with sales representing 78.2% of the Group total, initiatives have been implemented in the purchasing and supplier management departments which have resulted in project cost savings.
- Environmental, social or governance clauses are included in contracts to be adopted by subcontractors or providers in companies representing 96.3% of the ACS Group's sales. The percentage of costs in procurement covered by these clauses is 84.5%.

Sustainable procurement at Turner

A notable example of sustainable construction at Turner is the Phipps Center for Sustainable Landscapes in Pittsburgh, Pennsylvania (USA). This building was constructed with the goal of being the first to meet the requirements of three independent sustainable construction certificates: the LEED Platinum, the Four Stars Sustainable Sites Initiative, and the Living Building Challenge.

As the general contractor, Turner faced the challenge of meeting the strictest sustainable construction stipulations in procuring materials. All of the materials had to be sourced locally and pass a test to detect potentially hazardous chemical components, in addition to other tests included in the Living Building standards.

In order to reach this goal, Turner had to coordinate its procurement activities with its materials suppliers and the specialists at the factories.

Moreover, various aspects of the subcontractors were monitored on site. For example, the trucks and equipment had to run on low-sulphur diesel, and a complete recycling system was designed for construction waste.

The Engineering News-Record (ENR), a benchmark journal in the global construction industry, selected the Phipps Center for Sustainable Landscapes as the best green project in the world in 2014.

4.4. Technological Development. R&D+i in the ACS Group

4.4.1. Strategic Priorities

The ACS Group is an organisation which is continually evolving, adapting to the needs of its clients and demands from society. The diversification process through which the ACS Group is passing during these years has led it to undertake a wide range of activities which approach innovation and development differently, but resolutely. Through this commitment to technological development, the ACS Group responds to the growing demand for improvements in processes, technological progress and quality of service from its clients and from society.

Its involvement in research, development and innovation are clear in its increased investment and the R&D+i[14] efforts the ACS Group makes year after year. This effort leads to tangible improvements in productivity, quality, client satisfaction, occupational safety, the obtaining of new and better materials and products and the design of more efficient production processes and systems, among others.

The ACS Group's largest companies have governing bodies for technology, which are usually the Technological Development Committee, which leads the development of research activities in each company. The existence of this governing body or committee was reported by companies representing 91.2% of ACS Group sales in 2014.

R&D management takes place through a system which, in the largest companies and in general, follows the guidelines in the UNE 166002:2006 standard and is audited by independent specialists. There is a formal management system in companies representing 68.9% of Group sales. Furthermore, independent audits are carried out in companies representing 33.6% of sales.

This management system serves the general research strategy of each of the companies which, whatever their specific features, share the following lines of action:

- Development of strategic lines of research individualised by company
- Strategic collaboration with external organisations
- Growing and responsible investment in order to promote research and generate patents and operational techniques constantly and efficiently

Each Group company's strategic decisions on the execution of R&D projects seek to maximise the positive impact of ACS's technical and technological progress. The companies have analysis and discrimination procedures to decide which projects to undertake.

At 31 December 2014, the ACS Group had 281 projects in progress and had registered 11 patents during the year. Over the past 10 years, the Group has registered a total of 54 patents.

Furthermore, collaboration with external organisations is crucial for the success of the projects tackled. Hence ACS Group companies collaborate with research and technological centres and with universities, as well as will other diverse centres, institutes or institutions related to R&D+i. These prestigious international research institutions complement the ACS Group's own research capabilities.

The ACS Group invested a total of €54.8 million in research, development and innovation in 2014, which represents an increase of around 10.9% compared to 2013.

[14] The information about the ACS Group included in this section has been calculated based on an analysis of the information provided by the various companies of the Group, weighted by the companies' turnover. The information is presented as a percent of the Group's total sales in 2014.

4.4.1.1. Construction

The majority of ACS Group Construction[15] companies have a system for managing research, development and innovation. Such a system is reported by companies representing 61.2% of ACS Group sales in this area. Generally, these management systems are implemented around the UNE 166002:2006 standard.

Although decentralised, management is coordinated by Dragados' departments and, on the other hand, independently in HOCHTIEF's companies. To meet the objectives set by their respective lead companies, the ACS Group's construction companies had 169 projects in progress at the end of 2014, managed by the different R&D+i managements. ACS's Construction companies invested €20.1 million in R&D+i during the financial year, nearly 12.5% more than that spent in 2013.

Dragados: DIRECTION R&D+I PROJECT (Demonstration at European Level of Innovative and Replicable Effective Solutions for very Low Energy new Buildings)

The DIRECTION R&D+I Project commissioned by the European Commission as part of its 7th Framework Programme began in January 2012 and will be completed in December 2015. The goal of the project, which is classified under the research priority "*EeB.ENERGY.2011.8.1-1: Demonstration of very low energy new buildings"* is to evaluate, optimise and monitor three European buildings in order to show how their primary energy consumption can be decreased to less than 60 KWh/m^2 per year. These three pilot buildings have been designed to integrate a series of innovative technologies and measures ranging from passive systems to high-efficiency devices, including advanced control systems, all to bring them to these levels of energy consumption.

The DIRECTION project came about as a response to the Energy Performance of Buildings Directive (EPBD) which, as part of the Energy Efficiency Action Plan proposed by the European Commission, introduces the concept of, Net-Zero Energy Buildings (NZEB). This directive requires all newly built European buildings to be NZEB type buildings by 2018 for public buildings or by 2020 for all other buildings.

The structure that has been defined for the DIRECTION Project for achieving these targets and to contribute to the implementation of the directive in Europe is based on three phases:

- Analysing and proposing which high energy efficiency systems and technologies would best match the types, uses and locations of the three buildings in questions, focusing on maximum energy and economic profitability.
- Implementing these technologies and monitoring consumption in comparison to other control scenarios for achieving them, while retaining the expected levels of comfort and energy consumption.
- Publishing the results of the project in Europe.

[15] The data referring to the ACS Group's Construction companies included in this section were calculated by analysing the information supplied by the different companies in this area of activity, weighted by level of turnover. The data is expressed in terms of percentage of total Construction area sales.

Dragados: DIRECTION R&D+I PROJECT (Demonstration at European Level of Innovative and Replicable Effective Solutions for very Low Energy new Buildings)

Illustration 1 – Representation and location of the three pilot buildings in the DIRECTION project

This project prioritises implementing and demonstrating technologies. Therefore, three pilot buildings have been selected for validating the research conducted in the project in different climactic regions of Europe. A brief description is given below of the three sample buildings:

UN-Office building located in Munich (Germany). The building's surface area is greater than 11,000 m2, and its most notable energy efficiency aspects include:

- A heat absorption pump connected to District Heating
- Use of underground water for generating heat and cooling.
- Thermal pillars for distributing heating and cooling.
- High-efficiency lighting (LEDs).
- Automatic light control systems (electrochromic windows, etc.).

The Cartif III Building in Valladolid (Spain): a 4,075 m2 mixed-use building (industrial and offices) with the following integrated features:

- Curtain walls to make use of natural light and slats for controlling solar radiation.
- Geothermal systems for generating heating and cooling.
- High-efficiency lighting.
- Adjustable flow ventilation.
- Advanced control systems.

The *Black Monolith*[16] in the Bolzano Technology Park (Italy): an 11,000 m2 office building designed with the following systems:

- High-efficiency lighting.
- Systems for making use of natural resources (natural light and ventilation).
- Geothermal energy.
- A desiccant evaporative cooling system.
- Renewable energy production systems.

[16] This building is still pending administrative licenses for construction.

Dragados: DIRECTION R&D+I PROJECT (Demonstration at European Level of Innovative and Replicable Effective Solutions for very Low Energy new Buildings)

The DIRECTION consortium is comprised of 11 partners from various European countries, including DRAGADOS as the main industrial partner, which is also in charge of building the Cartif III building in Valladolid.

Some of the impacts the DIRECTION consortium hopes to achieve:

- Up to 50% energy savings in newly-built buildings due to the use of high-efficiency technologies and measures (from an energy and an economic perspective).
- Reduced CO_2 emissions by decreasing energy consumption and as a result of using renewable energy generation systems.
- Development of a sustainable model for designing buildings with extremely low energy consumption that could be replicated in Europe by 2020.
- Increasing the use of TICs in buildings.
- Increased awareness among the various stakeholders in the industry regarding how to adopt best energy management practises.
- Contributing to the effective implementation of European energy policies.

Dragados: RATIO R&D+I project (Innovation in Enhanced Reality technologies for use in topographical measurement systems)

The goal of the RATIO project is to contribute to improving the geometric measurement and control techniques commonly used in topography, going in depth into developing and subsequently transferring Enhanced Reality (RA) technologies to the field of topography and geometric auscultation of structures, both in their various construction phases and in their post-construction tracking.

Illustration 1: basic operating schematic of the RATIO system

To do this, the creation of an advanced software platform has been proposed that, acting as an interface between next generation topographical devices with dynamic image acquisition and digital tablets, will make it possible to insert three-dimensional objects into the visual field obtained by a topographical instrument. What is truly innovative in this concept is that it will be possible to interact with the object which, once it has been geo-referenced in the image, will act as both a master for laying out the project in its environment and as a model for comparing what was actually constructed with the theoretical geometry that was entered digitally.

Dragados: RATIO R&D+I project (Innovation in Enhanced Reality technologies for use in topographical measurement systems)

In over two years of work, the Topography Department and the R&D Department (both of which are part of DRAGADOS' Technical and R&D+I Office) have worked together with the company LEICA Geosystems and the Institute of Robotic Research and Information and Communication Technologies of the Universidad de Valencia to develop this novel application for tablets that provides an intuitive and real time way of performing geometric auscultation on topographical structures by taking high-precision measurements and then comparing them with the theoretical measurements of the 3D elements representing said structures.

The functionality of the application has been validated in multiple tests. The images show the tests that were taken with a scale representation of a bridge pile, where the results were highly satisfactory.

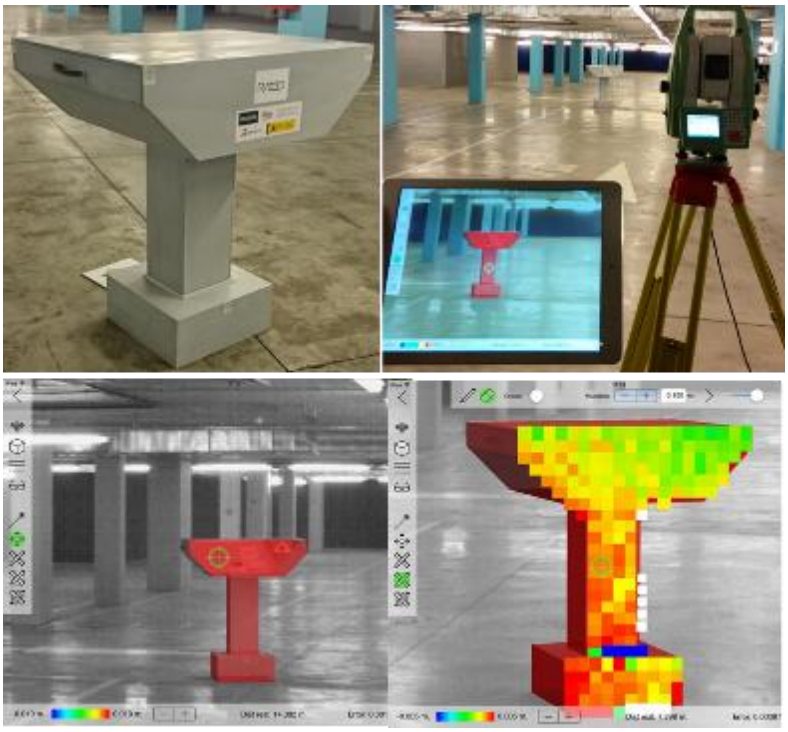


Illustration 2: Tests validating the RATIO application

The application that has been developed has introduced a series of fundamental innovations such as:

- The possibility of introducing three-dimensional models (wiring, rendered surface views, photo-realistic models, etc.) from standard CAD or industrial design formats.
- Dynamic georeferencing of objects.
- A virtual interface for capturing an object's data in order to directly lay it out using topographical instruments.
- Real time measurements indicating the geometric inconsistencies between the virtual model and the real model.
- Selection of areas and creation of hot/cold maps for dimensional controls with various precision thresholds.

Applying the technology developed in the RATIO project is expected to result in a series of improvements in the topographical measurement field:

- Decreased time for conducting geometrical verifications of monitored structures.
- Minimisation of errors in layouts due to the ease of operating the application (interaction with "visible" points of a 3D element instead of numerical coordinate values).
- Instantaneous visual control for detecting severe errors.
- Interactive control of three-dimensional geometry verification with high-precision measurements provided by high-performance total topographical stations.

The RATIO R&D project, which was approved as part of the INNPACTO 2012 programme, is co-financed by the Ministry of Economy and Competitiveness as part of the 2008-2012 National Scientific Research, Development and Technological Innovation Plan.

HOCHTIEF

New methods for building on-shore wind turbines

Representing 8% of its electricity mix, on-shore wind power accounts for nearly half of Germany's total green energy production. The wind turbines, whose hubs can reach over 140 metres above the ground, require alternatives to conventional steel tubes. These conventional towers are often difficult to ship and present a problem during construction, especially with the use of cranes.

In late 2013 HOCHTIEF began work on an R&D project to develop a concrete tower design that would be marketable. Based on the results from a previous R&D project for optimising the construction of towers for multiple megawatt wind turbines, HOCHTIEF spent 2014 working on the design of a resistant tower that would be reduced in terms of volume and would not require an overweight crane.

Building (and shipping) bridges

© Straßen.NRW-RNL Südwestfalen

HOCHTIEF is developing a new innovative solution for its project for the bridge over the A-45 highway in Germany. It will involve building a new 1000 metre bridge parallel to the existing Lennetal bridge. Once the old bridge has been taken down, the new bridge will be shifted 30 metres into its final position to replace the previous structure. This unique approach will help avoid blocking traffic, since the five highway lanes will remain open throughout the construction period. This will be the first lateral repositioning of a bridge on this scale in Germany.

Innovative radar technology to improve mine safety

© Thiess

The Australian Company Thiess is using radar technology to increase operational efficiency and workplace safety in the Burton coal mine in Queensland, Australia.

The system continuously monitors for possible landslides on the mine slopes all day long. Whenever it detects movement, the equipment and workers can be evacuated from the area immediately. This makes the radar system one of the most important technological tools available for mine safety. Its measurements are also used for long-term planning, and for calculating digging angles and position barriers. The technology is already being used in other Thiess mines.

4.4.1.2. Industrial Services

The ACS Group's Industrial Services[17] area carries out significant work in promoting research, development and innovation through the various R&D+i departments in several of the companies in this line of business. Companies representing 74.3% of Industrial Services' sales reported the existence of a specific R&D+i department in their structure.

Total investment of €26.7 million was allocated to the executing the 75 projects managed by the different departments, 8.4% more than in 2013. These projects are carried out by virtue of a formal research and development management system, which is implemented in companies representing 86.4% of Industrial Services' sales.

The R&D+i strategy of many of the companies in this area is based on an external focus, aimed at its stakeholders, and an internal focus, aimed at process modernisation and improvement.

Cobra: Flocan Project

The goal of the FLOCAN project is to develop design and basic engineering, including scale tests of a prototype and certification of the conceptual design, for a floating platform for off-shore wind power that will significantly contribute to reducing the current costs of wind power and make it easier and faster to install.

The concept developed by Cobra includes the use of a SEMI-SPAR type active concrete structure that combines the advantages of semi-submergible technology in the construction, shipping and installation phases with Spar technology during operation. The platform will furthermore be installed with an active ballast system that will help counteract wind-generated tipping, and therefore decrease average tilt and maximise energy production. Depending on the meta-oceanic conditions of where it is installed, this technology may be viable for depths in excess of 40 – 50 m. The use of the technology will make the construction process extremely flexible, maximising in-port operations (the wind turbine is installed on its platform in the port) and making it possible to ship and install the platform-turbine assembly with the use of conventional tools such as tugs.

The project is co-financed by the donating states of the European Economic Area (Norway, Iceland and Lichtenstein, EEA GRANT) and it was launched in February 2014 with a projected completion date in mid-2015.

ETRA: Proyecto ICOMON

With a budget of over €2.7 million and a three year timeframe, the goal of this project is to create and supply clients with a tool for managing and tracking fleets of nearly 5,000 vehicles, in order to define, manage and optimise the performance indicators of the ICOMON fleet using on-board computers, software and data centres as tools for obtaining the following results:

- Improving control and tracking of the services provided.
- Efficiently assigning the company's human and material resources.
- Making processes traceable and improving service compliance.
- Tracking compliance with planned services and reassigning them in real time.
- Increasing safety in terms of reducing accidents, preventing theft and increasing assistance response times.
- Reducing the fleet's operating costs (fuel and maintenance).
- Increasing driver efficiency and subsequently saving costs.
- Reducing the number of employees necessary for operating the fleet.
- Providing exact vehicle locations in real time and increasing driver safety by monitoring speed.

The fleet's vehicles will be equipped with an on-board device with GPRS communication and location functionalities that can receive information from environmental sensors (via USB, digital input/output or CAN bus) for storage or processing.

[17] The data referring to the ACS Group's Industrial Services companies included in this section were calculated by analysing the information supplied by the different companies in this area of activity, weighted by level of turnover. The data is expressed in terms of percentage of total Industrial Services area sales.

SICE: LOCRIN - LOCalisation and Recording of INdividuals in high-complexity scenes

This project, co-financed by the *Retos* programme of the Ministry of Science and Innovation (MICINN), involves working together with the Fundación CIDAUT of the Centro Tecnológico de Valladolid to develop a high precision product that will be able to count people in street locations (subjected to lighting variations) based on Artificial Visioning.

This system has been proposed for counting how many people are waiting to cross a crosswalk or how many are getting on/off a bus. Basically, the system:

- Counts people
- Follows peoples' paths or detects if they have stopped.

The counting system that has been developed uses TOF cameras (based on Time-of-Flight technology) that operate very well in night time conditions (low light) and which are not affected by shadows (changes in lighting). The precision of this type of technology decreases when there is excess lighting (sunlight).

The accuracy tests conducted on these types of cameras in uncontrolled lighting environments have shown them to be:

- 85% accurate in crosswalk areas
- 99% accurate in counting people in bus areas

Scenario – Pedestrian Crossing

The system's path tracking algorithm makes it possible to monitor the direction in which pedestrians are travelling. Thus the girl that crossed the crosswalk is identified with a blue dot and is not recorded as a pedestrian waiting to cross.

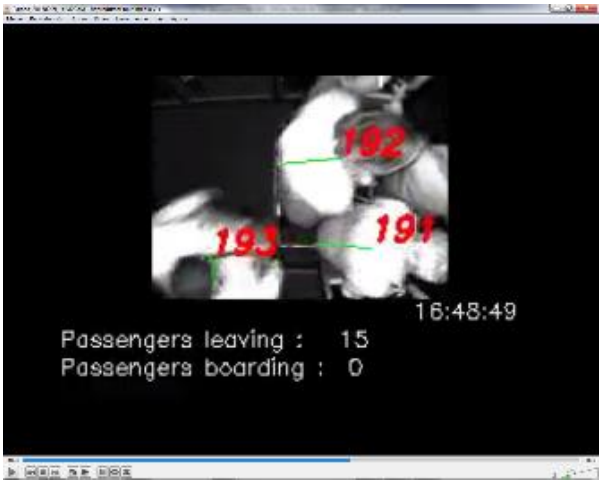
The system has an integrated traffic light regulator so that cross requests (pedestrian green lights) can be activated based on the number of pedestrians waiting.

After this, an **HW system that was developed was installed in a bus** and integrated into its door opening systems. Then accuracy tests were performed with the algorithm as shown in the following figures:

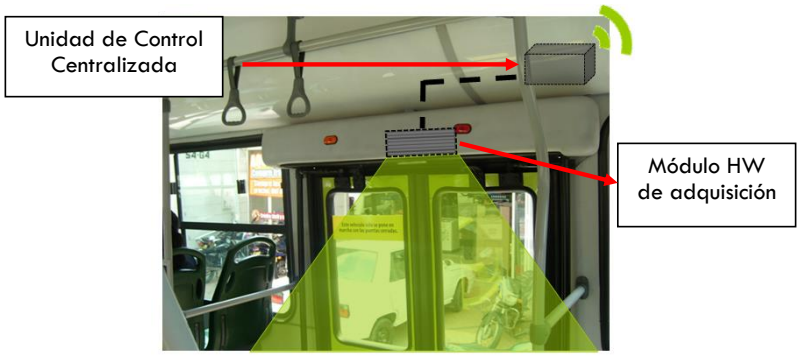
SICE: LOCRIN - LOCalisation and Recording of INdividuals in high-complexity scenes

The previous figure shows that as long as the door did not open, the detection algorithm did not work (it was not engaged).

But when the door opening system was activated, the algorithm began to detect people (assigning then an identifier, the red numbers). From this point on the people's paths were recorded and the counters were updated.



With the application and the interface developed in this way, a user can view a situation remotely from a control centre in real time (if the 3G communications module is engaged). In this way the passengers leaving and boarding the bus are monitored at each stop, together with the occupancy level of the bus, integrating this into a GIS application.



Acquisition module and centralised control unit

SICE: LOCRIN - LOCalisation and Recording of INdividuals in high-complexity scenes

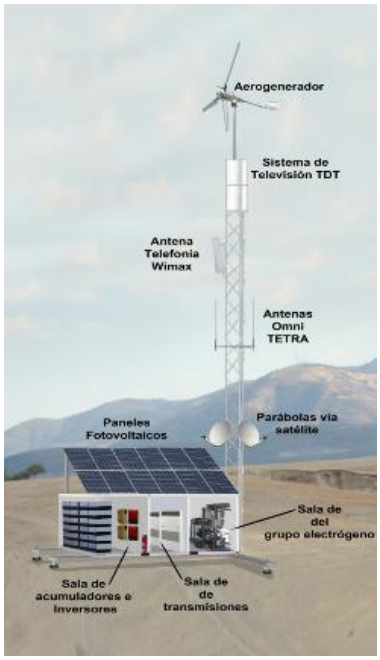
The entire system has been integrated into a unit that is as small as possible so that it goes practically unnoticed by the people using the transportation system. The passenger detection device is positioned above the bus doors, with as many devices installed as there are doors in the system:

Ruggedised LOCRIN HW acquisition module

While the price of these TOF cameras is rather high due to the technology they use, the algorithms that have been developed can be extrapolated to less expensive cameras with fewer features (infrared or digital). This may be an appropriate solution for proposed projects where the lighting conditions are controlled (bus and rail stations, etc.).

SICE: Standalone portable energy efficient telecommunications station

Sistemas Radiantes Moyano, a subsidiary of SICE Tecnología y Sistemas, S.A., is a telecommunications company that primarily focuses on global radio and telephony network markets, specialising in the design, manufacture, installation and maintenance of radiant systems (radio, TV, mobile telephony, etc.) and masts for supporting antennas.



Having telecommunications infrastructures that meet the current needs of the market is crucial for the development of an information society. As data transmission and reception frequencies increase, new more advanced communications centres become more necessary in order to meet this demand and the European, domestic and regional policies that place a priority on ensuring that all citizens have access to new technologies. Even so, while there are numerous optimal locations for installing centres for broadcasting digital terrestrial television, mobile telephone networks or rural broad band, there is no possibility of connecting to an electric grid or the costs are prohibitive and there is only a limited functional guarantee, since the electricity is generated in these locations with obsolete generators that have high CO_2 emissions and exorbitant fuel consumption.

In this context, Sistemas Radiantes Moyano has proposed to develop an innovative telecommunications station for broadcasting, receiving and transmitting data that would be equipped with control systems (on-site and remote) and would be significantly independent from the electrical grid due to the integration of hybrid self-generating power systems using renewable energy sources.

The project includes providing broadband internet services in rural locations, digital terrestrial television, and communications repeaters. To do this it will have two satellite links for providing internet and digital terrestrial television.

SICE: Standalone portable energy efficient telecommunications station

The proposed solution consists of:

- A 20' ISO container that will house the various rooms.
- A stand-alone communications tower that will measure up to 20 metres high and be connected to the container
- A remote control and remote management system
- Radiant systems, satellite receivers and communications systems.
- Renewable energy generation systems (a wind turbine and/or photovoltaic panels).

Furthermore, it will be possible to supply the equipment with an external power outlet of up to 25 KVA in order to meet other specific needs such as water treatment, auxiliary power services, etc.

The solution is innovative due to the building that houses the communications room which is responsible for controlling, distributing and storing energy efficiently, with an integrated unified photovoltaic, wind power and electric generator system. This power is instantly self-consumed, with any surplus stored in gel state in lead acid batteries.

The control, supervision and remote management system is mainly based on an automation platform (automated system). This system's primary function will be to control the power generation system: managing the system and ensuring efficient consumption, in addition to receiving and transmitting the satellite signal.

Its secondary function will be to monitor the system's operating parameters pertaining to its auxiliary devices, namely its presence detectors, temperature probes, ventilation control, intruder alarms, access control, etc. This secondary control will be particularly important for ensuring that the system is functioning properly given its unmanned rural location.

In sum, the main technical features of the solution are:

- Power generation using sustainable renewable means with the implementation of photovoltaic solar and wind power, and integrating a power generator as a power backup. Therefore, existing electrical grids will not be needed and the service can be guaranteed to have an availability of over 99%.
- Storage of excess power in gel acid batteries without generating hydrogen.
- Geo-positioning of the installations, remote control and remote operation of the generation and broadcasting systems, and data encryption with high-security protocols.

SICE: Standalone portable energy efficient telecommunications station

- Implementation of PLC and DATALOGGER technologies so the system will function rationally, implementing operating programmes for rational use of the power and for its generation and consumption.
- Integration of satellite reception of signals, without the need for existing data networks.
- Optimisation of economic and organisation resources by implementing a single system for generating, managing and storing power with the telecommunications centre itself, which has capacity to house devices from various operators with diverse technologies. This will foster the deployment of telecommunications that incur minimal environmental harm in relatively short timeframes.

From a functional point of view, the solution is remarkable for having the following features:

- Portable. The entire communications centre is housed in a standardised portable 10' or 20' container.

- Environmentally respectful. The equipment presents a minimal threat to the environment due to having four fundamental aspects:
    - Its surroundings do not need to be modified to install the system, since its four corners rest on the existing ground.
    - There is no need to extend or install electrical infrastructures for the system to have power, since it is energy independent.
    - There is no need to extend or install telecommunications infrastructures for the system to broadcast signals, since it is equipped with satellite communications.
    - By using renewable sources to generate electricity, its CO_2 emissions are reduced significantly.
- Fully stand-alone. No electrical grid is necessary for the system to function, and it additionally has smart independent functions with no need for user interaction.
- Energy savings. Current solutions are usually based on the use of power generators to generate electricity. In addition to their high level of fuel consumption they also emit large quantities of CO_2 into the atmosphere. The solution proposed in the project is estimated to have fuel savings and emission reductions in the 90% range.
- Remote management. The station is equipped with an advanced remote management and control system that makes it possible to obtain the station's operating parameters at any time. If any of the devices malfunctions, the operators will know what the problem is and what resources to send. This will subsequently not only save time but it will also determine what type of operator will need to make the repairs and what type of materials should be brought to the site.
- Security. The system has GPS geo-positioning and part of the internet connection's data package is used for sending still pictures in real time showing the station's status. The security system is completed with the inclusion of movement sensors and door opening alarms, temperature sensors and infrared cameras for fire prevention.

This project is co-financed by the AEESD (*Acción Estratégica de Economía y Sociedad Digital*) sub-programme of the Ministry of Industry, Energy and Tourism.

4.4.1.3. Environment

In the ACS Group's Environment[18] business, innovation constitutes a basic principle both in management and in processes for recovery, reuse and reclamation of wastes. To carry out this task, Urbaser and Clece each have their own specific R&D+i department with a formal management system certified under the UNE 166002:2006 standard and audited by an independent third party.

At 31 December 2014, there were 37 research and development projects in progress, in which €8.0 million were invested, 15.9% more than in 2013.

Urbaser – Thermal oxidation system for eliminating fumes

URBASER bases its activities on providing quality environmental services to residents. This is why we are constantly working on developing innovative solutions that will minimise the impact of our industrial processes.

When developing its ongoing improvement policy, URBASER decided that a solution needed to be found for the strong smells generated from the production processes of the used mineral oil recycling plant of its SERTEGO industrial waste processing subsidiary in Alfaro, La Rioja, which could be smelt throughout the urban area of the municipality.

While the emissions presented no threat to the residents' health, it was still necessary to eliminate the fumes in order to restore the quality of life to those living in Alfaro.

The analyses and research that were conducted resulted in a technical solution based on thermally processing the gasses.

In order to implement this thermal treatment to eliminate the odours, a thermal reactor was designed and built for burning them at high temperatures with excess air from a gas flow with a high percentage of organic compounds, using natural gas a supplemental fuel.

The equipment developed for reducing organic compounds has been shown to be approximately 95% effective.

In addition to complying with Directive 89/392/EEC (including amendments 91/368/ EEC, 93/44/ EEC and 93/68/ EEC) regarding machine safety, all of the electrical installations of the machines in the installation comply with standard IP 66.

The thermal reactor was manufactured in 10 weeks and after being installed and commissioned, it was shown to be effective at eliminating complaints from the Alfaro urban area.

This case demonstrates URBASER's commitment to providing integrated and flexible solutions to residents with the goal of improving their quality of life and offering better services to municipalities.

[18] The data referring to Environment included in this section were calculated by analysing the information provided by Urbaser and Clece.

4.4.2. Main Indicators

Main Management Indicators - R&D+i	2012	2013	2014	Objective for 2015
Investment in R&D+i (€ million)	49.0	49.4	54.8	> 2013
Level of implementation of a specific R&D+i department	87.0%	90.3%	91.2%	> 2013
Level of implementation of a formal system for R&D+i management	60.4%	71.5%	68.9%	> 2013

4.5. Environment

4.5.1. Strategy

The ACS Group[19] combines its business aims with the objective of protecting the environment and appropriately managing the expectations of its stakeholders in this area. ACS's environmental policy is intended to be a framework in which, on the one hand, the general lines to be followed (principles) are defined and, on the other hand, the particular features of each business line and each project are collected (articulation).

The principles are the ACS Group's general environmental commitments. These are sufficiently flexible as to accommodate the elements of policy and planning developed by the companies in the different business areas. In addition, these commitments need to keep within the requirements of the ISO 14001 Standard:

- Commitment to complying with the legislation
- Commitment to preventing pollution
- Commitment to continuous improvement
- Commitment to transparency, communication and the training of Group employees, suppliers, clients and other stakeholders

In order to be able articulate and deploy a policy on these environmental commitments, the most significant are identified at corporate level and are compared with each company's management system and the environmental priorities for each business. These common priorities, which then become common to the majority of the ACS Group members, establish objectives and programmes to individually improve each company.

4.5.2. Management Principles

The following is a map outlining the main common features of ACS Group company management models and summarising their initiatives and degree of implementation:

[19] The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2014.

Level of implementation of good environmental management practices in the ACS Group *(Expressed as % of sales)*	2012	2013	2014
Implementation of an environmental management system	55.8%	98.1%	97.7%
Implementation of ISO 14001 certification	68.0%	65.7%	63.9%
Implementation of certifications other than ISO 14001	10.6%	11.2%	1.2%
Existence of specific targets for reducing CO_2 emissions	71.3%	71.8%	73.1%
Execution of projects to reduce waste generation	73.2%	93.0%	94.1%
Existence of plans to reduce water consumption	15.1%	81.0%	81.3%
Setting of objectives to minimise the impact of the company's activities on biodiversity	32.8%	57.6%	15.7%
The remuneration of workers, middle management and/or executives is linked to the achievement of formal environmental objectives	25.0%	17.4%	16.9%
There is some kind of non-economic incentive/recognition for the achievement of formal environmental objectives	0.1%	46.5%	42.0%
The environmental management system has been audited by an external independent third party*	55.8%	98.1%	97.7%
Number of environmental audits carried out in your company	724	2,182	1,183
Number of environmental incidents which occurred	967	731	860
Existence of a system for collecting data on environmental near misses	33.0%	81.1%	79.2%
Existence of a centralised database to collect data on environmental matters	71.6%	77.5%	88.8%

* Includes all companies audited at least once by an independent third party as a consequence of its environmental management system.

The significant level of implementation of an environmental management system, present in companies representing 97.72% of Group sales, is based on the objective of seeking adoption of the ISO 14001 standard in the majority of the Group's activities, which is already implemented in 63.89% of ACS Group sales[20].

The responsibility of overseeing the ACS Group's environmental performance falls to the Environmental Department in each company. In general, and as summarised in the Management Principles table, the following common, general and most significant characteristics were found in ACS Group companies' management of environmental impacts:

- They themselves, in a decentralised and autonomous manner, develop their own policies and action plans
- They implement projects for certification and/or independent external auditing
- They carry out environmental audits
- They have some kind of centralised database for collecting environmental data
- They have a system for collecting incidents, non-conformities or near misses related to the environment
- Companies representing 96.67% of the ACS Group's sales have carried out some kind of environmental initiative that has led to cost savings, and 30.65% have carried out environmental initiatives that have led to an increase in revenues.

Specifically and operationally, the main environmental measures revolve around four key risks, on which the ACS Group's companies position themselves explicitly: **the fight against climate change, promotion of eco-efficiency, water saving and respect for biodiversity.**

[20] Other certifications cover 1.17% of Group sales.

4.5.3. Main Indicators[21]

Main Management Indicators - Environment	2011	2012	2013	2014	Objective for 2015
Percentage of sales covered by ISO 14001 Certification	72.6%	68.0%	65.7%	63.9%	> 2013
Total Water consumption (m^3)	5,577,931	10,067,651	18,460,840	20,152,730	N/A
Ratio: m^3 of Water / Sales (€ million)	151.3	262.2	465.9	566.7	< 2013
Direct emissions (Scope 1) (tCO_2 equiv.)	1,742,344	322,758	3,771,674	5,798,392	N/A
Scope 1 Carbon Intensity Ratio: Emissions / Sales (€ million)	47.3	8.4	95.2	163.0	< 2013
Indirect emissions (Scope 2) (tCO_2 equiv.)	151,738	392,331	302,158	463,901	N/A
Scope 2 Carbon Intensity Ratio: Emissions / Sales (€ million)	4.1	10.2	7.6	13.0	< 2013
Indirect emissions (Scope 3*) (tCO_2 equiv.)	13,620	1,451,662	7,103,265	10,718,982	N/A
Scope 3* Carbon Intensity Ratio: Emissions / Sales (€ million)	0.4	37.8	179.3	301.4	< 2013
Total Emissions (tCO_2 equiv.)	1,907,702	2,166,750	11,177,096	16,981,275	N/A
Total Carbon Intensity Ratio: Total Emissions / Sales (€ million)	51.7	56.4	282.1	477.5	< 2013
Non-hazardous waste sent for management (t)	1,168,706	1,274,102	3,115,431	8,746,743	N/A
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	31.7	33.2	78.6	246.0	< 2013
Hazardous waste sent for management (t)	186,989	88,182	268,137	176,526	N/A
Ratio: Tonnes of hazardous waste / Sales (€ million)	5.1	2.3	6.8	5.0	< 2013

[21] The ACS Group environmental information includes data from Leighton. In 2013 it contains information from January 2013 to December 2013 (inclusive), and in 2014 it contains the information for the period from July 2013 to June 2014 (inclusive). The data on this table corresponding to Leighton (for the period from July 2013 to June 2014) are: ISO 14001 (100%), Scope 1 CO2 Emissions: (5,362,111 tonnes), Scope 2 CO2 Emissions: (271,610 tonnes), Scope 3 CO2 Emissions: (2,747,782 tonnes).

At HOCHTIEF in 2014 hazardous and non-hazardous waste amount to 150,363 tonnes and 8,213,595 tonnes respectively. These figures include data from Leighton.

In terms of water consumption reported, an increase has been noted as a result of the international growth of Cobra. Also, figures do not include information from Leighton, as available data consists of estimates based on the cost of the resource. Consumption estimated by Leighton using this method totalled 12.5 million m3 in 2013 and 37 million m3 in 2014.

A methodology has been adopted in this report to account for CO2 emissions in all years under which Urbaser classifies the emissions from water and waste treatment centres as indirect under Scope 3, as it does not own or have operational control over these facilities, as included in the international GHG Protocol (Appendix F) and EPE Protocol (waste sector methodology) standards Urbaser has invoked to calculate its Carbon Footprint. The Public Authorities, as the owners of the facilities, impose the operating requirements, with the management companies limiting themselves to operating them temporarily.

The Scope 3 emissions include calculations for travel by employees. In addition, HOCHTIEF and Leighton include emissions calculated for the Supply Chain (Cement, Wood, Scrap and Steel).

4.5.4. Risks

Level of implementation of good environmental management practices in the ACS Group. 2014 (Expressed as % of sales)	Construction	Industrial Services	Environment
Implementation of an environmental management system	97.6%	99.4%	95.5%
Implementation of ISO 14001 certification	59.7%	75.7%	73.0%
Implementation of certifications other than ISO 14001	1.6%	0.0%	0.0%
Existence of specific targets for reducing CO_2 emissions	86.8%	10.6%	95.5%
Execution of projects to reduce waste generation	96.4%	85.1%	95.5%
Existence of plans to reduce water consumption	94.2%	25.8%	95.5%
Setting of objectives to minimise the impact of the company's activities on biodiversity	9.1%	5.9%	95.5%
The remuneration of workers, middle management and/or executives is linked to the achievement of formal environmental objectives	6.8%	11.3%	27.2%
There is some kind of non-economic incentive/recognition for the achievement of formal environmental objectives	83.2%	1.4%	27.2%
The environmental management system has been audited by an external independent third party	97.6%	99.4%	95.5%
Number of environmental audits carried out in your company	206	385	592
Number of environmental incidents which occurred	533	32	295
Existence of a system for collecting data on environmental near misses	95.5%	28.9%	52.0%
Existence of a centralised database to collect data on environmental matters	96.4%	76.2%	52.0%

4.5.4.1. Climate Change

The ACS Group shares with society the growing concern over climate change, hence companies that represent 73.09% of the ACS Group's sales define targets for reducing it, and in 2014 companies representing 28.65% of ACS Group sales implemented an active policy for reducing its greenhouse gas emissions.

The main challenge is to understand and quantify all the ACS Group's emissions. Each company is responsible for maintaining an inventory of emissions, in which the main sources are identified. All Group companies measure their energy consumption and their direct and indirect emissions. Specifically, Urbaser, the Group Company that provides Environmental services, has a sophisticated process for measuring, controlling, reducing and compensating emissions. The company defines the Group's strategy against Climate Change due to the material nature of its impact on the latter. Urbaser has developed a tool for measuring its impact in carbon footprint terms. This is a system which can be audited and already contains information since 2012 and will act as a measurement baseline for developing specific policies for reducing emissions over the coming years.

Overall responsibility for climate change in the Group falls to ACS's Board of Directors, which approved and oversees the development of policies to minimise impact in this area. In turn, remuneration to workers in companies representing 16.87% of ACS employees include aspects related to environmental performance and specifically to achieving objectives related to climate change.

ACS Group strategy in the fight against climate change is based on proper management of direct emissions, fossil fuels, on renewable energies, on energy efficiency and saving and on sustainable travel. The results expected as a consequence of active policies for containing climate change are:

- Reduction of direct emissions by means, for example, of the implementation of new production processes.
- Reduction of indirect emissions by moderating fuel consumption, for example, and promoting energy efficiency.
- According to the data gathered in 2014, the emission reduction initiatives carried out by ACS Group companies saved 1,789.1 tonnes of CO_2 equivalent.
- Analysis of the possibility of implementing Energy Management Systems (in accordance with UNE-EN ISO 16001 certification, where appropriate).
- Training of employees, raising client awareness (companies accounting for 90.98% of sales offer clients products and/or services that facilitate emissions reduction) and monitoring of suppliers.
- The financial consequences of climate change for each company's business has begun to be measured.

Another key aspect lies in the promotion of the use of renewable energy or sources less intensive in carbon, as well as the use of the best technologies in the combustion of fossil fuels as two fundamental aspects to reduce CO_2 emissions.

The ACS Group has extensive experience in the development of and participation in renewable energy projects. The ACS Group participates in the operation of renewable energy plants (mainly wind and solar thermal), specifically:

- At 31/12/2014, the total wind power installed in Spain was 547.7 MW. These farms produced a total of 1,127.4 GWh during 2014.
- Outside Spain at 31/12/2013, there were 128.1 MW in Portugal that generated 294.07 GWh and 102 MW in Mexico which produced 368.21 GWh. Outside of Spain, ACS has 32.1 MW in construction in Peru and 20 MW in Portugal.
- In turn, at 31/12/13 the ACS Group had an installed power in Spain in six solar thermal plants of 299.5 MW, as well as a 10% stake in two solar thermal plants of 49.9 MW each, which produced a total of 1,163.5 GWh in 2014. It also had a stake in a 110 MW solar thermal plant under construction in the United States in 2014.

This represents a total of 2,953.18 GWh.

CO_2 emissions by area of activity; tCO_2 equiv.	2011	2012	2013	2014
Construction. Total emissions	**144,592**	**669,396**	**7,650,751**	**12,755,282**
Construction. Scope 1	80,737	143,205	3,526,160	5,516,069
Construction. Scope 2	54,080	330,260	225,960	375,199
Construction. Scope 3	9,775	195,931	3,898,631	6,864,014
Construction. Total Emissions / Sales ratio (€ million)	5.1	22.6	258.8	494.0
Industrial Services. Total emissions	**61,016**	**86,025**	**99,278**	**139,191**
Industrial Services. Scope 1	43,174	43,035	72,798	105,798
Industrial Services. Scope 2	14,824	33,524	15,064	17,264
Industrial Services. Scope 3	3,018	9,466	11,416	16,130
Industrial Services. Total Emissions / Sales ratio (€ million)	8.7	12.2	14.0	20.6
Environment. Total emissions	**1,702,094**	**1,411,329**	**3,427,066**	**4,086,801**
Environment. Scope 1	1,618,433	136,518	172,716	176,525
Environment. Scope 2	82,834	28,547	61,133	71,438
Environment. Scope 3	826	1,246,264	3,193,217	3,838,839
Environment. Total Emissions / Sales ratio (€ million)	1,009.5	834.6	1,142.4	1,365.5

The ACS Group environmental information includes data from Leighton. In 2013 it contains information from January 2013 to December 2013 (inclusive), and in 2014 it contains the information for the period from July 2013 to June 2014 (inclusive). The data on this table corresponding to Leighton (for the period from July 2013 to June 2014) are: ISO 14001 (100%), Scope 1 CO2 Emissions: (5,362,111 tonnes), Scope 2 CO2 Emissions: (271,610 tonnes), Scope 3 CO2 Emissions: (2,747,782 tonnes).

A methodology has been adopted in this report to account for CO2 emissions in all years under which Urbaser classifies the emissions from water and waste treatment centres as indirect under Scope 3, as it does not own or have operational control over these facilities, as included in the international GHG Protocol (Appendix F) and EPE Protocol (waste sector methodology) standards Urbaser has invoked to calculate its Carbon Footprint. The Public Authorities, as the owners of the facilities, impose the operating requirements, with the management companies limiting themselves to operating them temporarily.

The Scope 3 emissions include calculations for travel by employees. In addition, HOCHTIEF and Leighton include emissions calculated for the Supply Chain (Cement, Wood, Scrap and Steel).

4.5.4.2. Eco-Efficiency

The ACS Group attaches a priority to efficiency in resource consumption and reduction of waste generation, as an effective strategy in these aspects implies benefits from two angles. On the one hand, it reduces the environmental impacts on the surroundings and, on the other, it cuts the costs needed for their purchase or treatment.

To this effect, the ACS Group strategy is based on two fundamental aspects:

- The implementation of projects to reduce waste generation, an exercise which takes place in companies representing 94.15% of ACS's sales
- The carrying out of projects to reduce material and/or raw material consumption, which takes place already in companies representing 77.51% of ACS Group sales

In addition, there is notable implementation of policies in relation to the application of sustainable building standards[22]. These are applied in those cases in which the client accepts them, given that the ACS Group in the great majority of cases works for third parties in building development.

Sustainable Building standards

HOCHTIEF, both in Turner in the United States, in Leighton in Australia and in Europe, carries out building activities in accordance with sustainable building standards.

Since the year 2010, 495 projects have been registered and certified in terms of efficient building.

Turner mainly works in accordance with LEED standards, Leighton uses the GBCA – Green Building Council of Australia – Australian Green Star Methodology in carrying out its building activities, and HOCHTIEF in Europe mainly uses DGNB, LEED and BREEAM certifications.

[22] For example, systems for sustainable building certification LEED – Leadership in Energy & Environmental Design, BREEAM – BRE Environmental Assessment Method, LCC – Life Cycle Cost Results, etc.

Eco-Efficiency in the ACS Group: ISO50001 Certification

In 2014, work began on developing an initiative to analyse the energy efficiency in ACS Group installations. This initiative focuses on measuring the space in square metres of offices with ISO50001 certification (or similar). Once solid comparable data has been gathered, targets will be defined. In 2014, data from 2,625,553.58 m2 was gathered, 18.13% of which is certified.

Waste treatment

Special importance is attached to the wastes section, as the procurement part depends predominantly on the client's needs and requests. Hence, more resources, efforts and policies are dedicated to the handling of wastes than to any other discipline in eco-efficiency.

In this respect, the ACS Group appropriately segregates, stores and manages its wastes. Its management is always aimed at minimising the wastes generated, both in terms of quantity and of their hazards, on giving priority to recycling and reuse above other management options and in energy recovery as the preferred choice as against dumping.

Wastes treated by type and area of activity	2011	2012	2013	2014
Total ACS Group				
Non-hazardous waste sent for management (t)	**1,168,706**	**1,274,102**	**3,115,431**	**8,746,743**
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	31.7	33.2	78.6	246.0
Hazardous waste sent for management (t)	**186,989**	**88,182**	**268,137**	**176,526**
Ratio: Tonnes of hazardous waste / Sales (€ million)	5.1	2.3	6.8	5.0
Construction				
Non-hazardous waste sent for management (t)	**1,125,254**	**1,110,220**	**3,054,986**	**8,689,624**
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	40	37	103	337
Hazardous waste sent for management (t)	**2,972**	**5,784**	**232,656**	**157,804**
Ratio: Tonnes of hazardous waste / Sales (€ million)	0.1	0.2	7.9	6.1
Industrial Services				
Non-hazardous waste sent for management (t)	**30,755**	**80,497**	**42,519**	**39,255**
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	4	11	6	6
Hazardous waste sent for management (t)	**240**	**7,198**	**24**	**35**
Ratio: Tonnes of hazardous waste / Sales (€ million)	0.0	1.0	0.0	0.0
Environment				
Non-hazardous waste sent for management (t)	**12,697**	**83,386**	**17,926**	**17,864**
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	8	49	6	6
Hazardous waste sent for management (t)	**183,777**	**75,200**	**34,214**	**16,391**
Ratio: Tonnes of hazardous waste / Sales (€ million)	109.0	44.5	11.4	5.5

At HOCHTIEF in 2014 hazardous and non-hazardous waste amount to 150,363 tonnes and 8,213,595 tonnes respectively. These figures include data from Leighton.

Waste is managed in accordance with the regulations in force in each country. The facilities have the corresponding authorisations for producers of hazardous waste, which allow for their recording, inventory taking, storage and management. The non-hazardous wastes generated are reused in the production location or collected by an authorised manager for treatment, recycling or reclamation or, failing this, for disposal in controlled dumps.

The ACS Group also generates other hazardous wastes or wastes with specific regulation which need to be treated respectively by an authorised hazardous waste handling company or Integrated Waste Management System. Hazardous waste is, in general, delivered to authorised handling companies in accordance with the legislation in force.

Rationalisation of Energy and Material Resource Consumption

A large portion of the natural resources consumed by ACS Group companies is used efficiently. To achieve this, the best available technologies are used as regards efficiency and reduction of material and energy resource consumption.

Procurements	2013	2014
Percentage of certified wood	1.0%	1.0%
Total wood purchased (m^3)	840,828.1	1,249,717.1
Percentage of recycled steel	7.7%	37.4%
Total steel purchased (t)	1,031,686.1	1,178,659.9
Percentage of cement / concrete with recycled aggregate	0.1%	0.1%
Total cement / concrete purchased (m^3)	8,378,955.1	14,741,069.0
Percentage of recycled glass	100.0%	99.4%
Total glass purchased (m2)	2,880,152.9	2,896,348.3

Energy consumption by source	2011	2012	2013	2014
Total ACS Group				
Petrol + Diesel (million litres)	114.2	104.2	1,367.3	2,108.1
Natural gas (m^3)	1,184,488.0	2,136,012.0	343,509.0	402,636.0
Natural gas (kWh)	N/A	35,137,353.0	58,517,257.3	97,179,340.2
Electricity (MWh)	466,720.0	1,279,301.9	566,015.4	861,156.0
Construction				
Petrol + Diesel (million litres)	33.4	40.6	1,281.0	2,011.2
Natural gas (m^3)	285,276.3	273,568.6	310,951.3	267,346.6
Natural gas (kWh)	N/A	976,526.7	224,000.0	657,929.0
Electricity (MWh)	116,564.4	1,086,737.0	316,187.4	570,332.9
Industrial Services				
Petrol + Diesel (million litres)	16.6	16.0	26.7	38.8
Natural gas (m^3)	60,675.2	31,591.0	32,557.7	135,289.5
Natural gas (kWh)	N/A	768,522.5	802,370.7	582,211.2
Electricity (MWh)	53,152.0	98,629.8	49,391.6	56,601.8
Environment				
Petrol + Diesel (million litres)	64.2	47.4	59.6	58.1
Natural gas (m^3)	838,536.8	1,830,853.0	0.0	0.0
Natural gas (kWh)	N/A	33,392,304.5	57,490,886.5	95,939,200.0
Electricity (MWh)	297,004.0	93,935.1	200,436.4	234,221.3

The ACS Group environmental information includes data from Leighton. In 2013 it contains information from January 2013 to December 2013 (inclusive), and in 2014 it contains the information for the period from July 2013 to June 2014 (inclusive). The data on this table corresponding to Leighton (for the period from July 2013 to June 2014) are: Petrol and Diesel: 1,977.60 million litres, Electricity: 339,938 MWh.

The increase in natural gas consumption is mainly due to an increase in the number of vehicles that use this fuel at Urbaser, as well as to the inclusion of Clece within the scope, which did not hold this data for 2013.

The main use of petrol and diesel in ACS Group companies is transport of materials, personnel, earth movement and the use of certain machinery necessary for the company's operational activities.

4.5.4.3. Water

The activities carried out by the ACS Group involve considerable water consumption, especially in the construction field. As such, the company recognises the need to reduce consumption of this natural resource, especially in zones where there is water stress. As far as possible, and whenever the projects' characteristics so permit, recycled water which is unfit for human use is employed.

The keys to the ACS Group's strategy for reduction of water consumption are summarised in three points:

- Implementing appropriate measurement systems (at project, company and corporate level), permitting detailed knowledge of the main sources for consumption. This is an initiative applying to the majority of the ACS Group.
- Carrying out actions which promote reduction of water consumption or which encourage the consumption of recycled water. Companies representing 81.31% of ACS Group sales have established plans for reducing water consumption in their activities.

Driving and developing operational policies for water management and desalination. The ACS Group currently operates desalinating plants in Spain and Algeria.

The ACS Group has numerous measures aimed at reducing water consumption, such as raising employee awareness, reuse of cleaning water and the use of rainwater. Specifically, in the Construction area:

- Good environmental practices are applied to minimise consumption, especially of water
- Reuse of water from machinery cleaning in works
- Awareness campaigns were organised with guidelines to reduce water consumption
- Use of rainwater.

The ACS Group pays attention to improving its management and use of water, with special consideration for those works located in geographical zones with water stress. As such, ACS has been making efforts for many years in the south-east part of the Iberian Peninsula and on the Canary Islands, these being locations which have frequent water deficits. The Environmental Management System considers water stress as an additional variable in the evaluation criteria for the "water consumption" parameter, which leads to the initiation of preventive measures to optimise water consumption and the monitoring of the effectiveness of these measures.

Lastly it is worth emphasising that the ACS Group carries out exhaustive monitoring of the quality of water discharged to the natural environment. In this regard, all monitoring carried out meets legal demands, such that significant effects do not occur in the natural environment.

Water consumption and discharges.	2011	2012	2013	2014
Total ACS Group				
Potable water consumption (m^3)	5,577,931.0	6,677,845.0	6,014,566.0	5,497,862.0
Non-potable water consumption (m^3)	N/A	3,389,806.4	12,446,274.0	14,654,867.9

Water consumption and discharges.	2011	2012	2013	2014
Total waste water discharged (m^3)	4,136,225.7	4,263,678.7	7,833,733.0	9,467,892.1
Ratio: m^3 of Water / Sales (€ million)	151.3	262.2	465.9	566.7
Construction				
Potable water consumption (m^3)	2,649,086.7	3,026,719.0	509,758.0	622,293.4
Non-potable water consumption (m^3)	N/A	1,125,737.0	231,654.0	105,175.7
Total waste water discharged (m^3)	1,987,813.1	1,752,485.2	258,943.6	739,543.8
Ratio: m^3 of Water / Sales (€ million)	94.1	139.9	25.1	28.2
Industrial Services				
Potable water consumption (m^3)	77,301.2	458,160.0	107.182,9	709.042,3
Non-potable water consumption (m^3)	N/A	4,693.0	10.008.120,4	12.755.352,4
Total waste water discharged (m^3)	35,412.7	161,525.7	6,081,782.5	7,540,258.6
Ratio: m^3 of Water / Sales (€ million)	11.0	65.7	1,431.3	1,994.7
Environment				
Potable water consumption (m^3)	2,851,543.1	3,192,966.0	5,397,625.1	4,166,526.4
Non-potable water consumption (m^3)	N/A	2,259,376.4	2,206,499.6	1,794,339.8
Total waste water discharged (m^3)	2,112,999.9	2,349,667.8	1,493,006.9	1,188,089.8
Ratio: m^3 of Water / Sales (€ million)	1,691.3	3,224.3	2,534.7	1,991.6

In terms of water consumption reported, an increase has been noted as a result of the international growth of Cobra. Also, figures do not include information from Leighton, as available data consists of estimates based on the cost of the resource. Consumption estimated by Leighton using this method totalled 12.5 million m^3 in 2013 and 37 million m^3 in 2014.

4.5.4.4. Biodiversity

The ACS Group's activities generate impacts on the natural environment where the works are executed. The implementation of measures to conserve the flora and fauna is one of the environmental principles applied in planning operations. These measures are based on physical protection, transplanting or transfer, as well as on respect for the life cycles of the plant and animal species affected.

At the end of 2014, a large number of Group companies, representing 74.00% of sales, were carrying out specific policies to manage projects located in areas of high biological value, or in their vicinity.

The ACS Group tries to minimise the environmental effect of its activities, especially when these take place in areas of high ecological value. Companies representing 15.73% of sales have set targets for minimising the impact of their activities on biodiversity. Projects are planned with the objective of minimising their environmental impact and, as far as possible, are carried out under the methodology which causes least damage in the setting.

The ACS Group prepares environmental impact studies, which attempt to minimise the possible adverse effects of projects on the natural environment (21.1% of tenders presented included an environmental impact analysis). Public participation in procedures to approve these projects is guaranteed by the national and regional legislation in each of the countries where they are carried out.

The company also has supervision plans which guarantee the fulfilment of the preventive measures and reduce the impact of projects and processes not subject to environmental impact assessments. Specifically, in the Construction area:

- Annual targets are set for identifying sensitive areas and species and adopting prevention and protection measures
- Protection plans are developed for native species

- The possibility of incorporating or replacing polluting chemical products with other biodegradable products is being studied
- Strict and rigorous compliance with environmental law
- Carrying out of some activities with lightweight machinery
- Activities for replanting and relocating species in similar habitats

The ACS Group includes the commitment to conservation of biodiversity in its environmental management systems, to meet the following objectives:

- To assess the impacts of the activities on the environment
- To research, develop and offer its clients innovations which improve environmental conditions
- To manage the impact and minimise its consequences

4.5.5. Good Practices

Dragados- Environmental Management system, results and recognitions in the Forth Crossing Bridge construction project in Scotland.

The Forth Crossing Bridge in Eastern Scotland is the cornerstone of the project to improve transportation in the region that has been promoted for years. Queensferry Crossing, the bridge being built in parallel to the current Forth Road Bridge crosses the Firth of Forth connecting Lothian with Fife. This is a crucial project for the region and for Scotland as a whole.

The Forth Bridge is overloaded in terms of capacity, with 30,000 vehicles per day crossing it in each direction. This problem has generated great concern as to the lifespan of the bridge, which was originally designed to last 120 years. An inspection in this regard showed that the suspension cables have lost between 8% and 10% of their tension.

The bridge project, financed by the Government of Scotland, entails a £1.6 billion investment, £790 million of which is allocated to Dragados' project.

In order to reduce the materials used and the cost of the project, a bridge was designed that will take advantage of its surroundings, such as the foundation of its central pillars. Furthermore, this will be the first time in Scotland that a bridge will have integrated control systems for modulating the speed limit to reduce traffic jams and for distributing bus traffic based on vehicle traffic patterns.

When it is commissioned, the bridge will be open to vehicles and public transport, pedestrians and cyclists.

Dragados- Environmental Management system, results and recognitions in the Forth Crossing Bridge construction project in Scotland.

In environmental terms, the project's goal is to reduce its impact on its surroundings and on the various affected habitats. A preliminary environmental impact analysis has therefore been conducted which, according to the independent analysis of CEEQUAL, has been deemed to be "Excellent."

The main environmental goals of the project are:

- To build a new bridge with the least possible impact on the environment and on residents.
- To provide a hub between Fife and Lothian that will be more energy efficient, both in the new bridge and in the old one (e.g., installing LED lights on both)
- To involve the local residents, promoting transparency and offering updated progress reports.
- To comply with the budget, deadlines and environmental, safety and quality standards.
- To have the construction industry recognise the project in terms of technical excellence and sustainability.
- To develop innovative construction methods to minimise environmental impact.
- To maximise the reuse and recycling of materials.
- To create employment opportunities for the local community.

The independent environmental analysis conducted by world renowned CEEQUAL, in which the project was rated as "Excellent," included the following objectives:

- To minimise CO_2 emissions in the construction phase
- To minimise waste production and to encourage waste to be reused and recycled
- To identify the origin of materials and to only use those provided by environmentally and socially responsible suppliers
- To protect and respect the biodiversity and ecology of the local area
- To protect water quality by fostering the use of systems that are less intrusive and which pollute less
- To optimise the environmental noise level, and reduce to a minimum emissions of particles and other contaminants.
- To involve the community, promoting transparency with the residents affected by the construction work
- To contribute to the creation of jobs in the area
- To reduce the impact on the landscape, avoiding affecting cultural heritage.

In order to reduce CO_2 emissions related to shipping materials, prevent bottlenecks and traffic in the area and limit the impact on local communities, the project selected to have materials supplied by sea whenever possible. Both the concrete and the steel from this project, in addition to various other materials, were provided for the project this way.

Moreover, the project proposed sourcing most of its supplies locally in order to reduce costs and the environmental impact of shipping them.

In terms of energy reduction, the following initiatives were developed:

- Using efficient power generation plants with a lifecycle of less than 36 months.
- Developing an on-site energy efficiency programme, reducing unnecessary heating and lighting costs and using collective transport subsidised by the project.
- Renewable energy consumption.

Dragados- Environmental Management system, results and recognitions in the Forth Crossing Bridge construction project in Scotland.

- Installing sensors, timers, LEEDs and other systems for minimising electricity consumption in terms of lighting on site and on the bridge proper.

In terms of the social impact of the project, the following aspects were developed:

- 45 internships
- 21 practicum work positions
- 46 jobs for the long-term unemployed
- 11 apprenticeships
- Out of a total of 415 sub-contractors, 250 (60%) were hired from amongst the local community, investing a total of £85 million in the region.
- Of a total of 15,460 orders, 14,174 were placed with Scottish companies for a total of £72 million.
- An average of 953 people worked on the project, with employment peaks of up to 1200 people.
- 43% of the jobs were created in Edin/Lothian/Fife; 35% came from elsewhere in Scotland
- Visits by residents, schools, associations, etc.

The Project was awarded the *Considerate Constructors 2014 Gold National Site Award, and the 2014 Silver Scottish Green Apple Award.*

5. Employees

5.1. The ACS Group's People

5.1.1. Strategic Priorities

The ACS Group's[23] business success comes from its team. Hence the company maintains its commitment to continuously improving their skills, capabilities and level of responsibility and motivation, at the same time as it attends to working and safety conditions with the greatest dedication.

The ACS Group applies modern and efficient human resource management tools with the objective of retaining the best professionals. Some of the fundamental principles governing the Group companies' corporate human resources policies are based on the following common actions:

- Attracting, retaining and motivating talented individuals
- Promoting teamwork and quality control as tools to drive excellence as work well done
- Acting quickly, promoting the assumption of responsibilities and minimising bureaucracy
- Supporting and increasing training and learning
- Innovating to improve processes, products and services

The ACS Group is an active defender of the human and labour rights recognised by various international organisations. The company promotes, respects and protects the forming of labour unions and employees' rights to freedom of association and guarantees equal opportunities and treatment, without discriminating on the basis of sex, ideology, religion or any other social or individual circumstance or condition.

Likewise, the Group promotes the professional development of its workers. With this aim, it has an employment policy which generates wealth in the zones where it operates and produces links which create positive synergies for the environment. Furthermore, it shows special interest in ensuring dignified working conditions, subject to the most advanced measures for health and safety at work. It promotes management by competences, performance assessment and management of the professional careers of its workers.

5.1.1.1. Main Figures

The ACS Group employs a total of 210,345 people, of whom 110,267 work in Spain and 100,078 abroad. Of all the employees, 36,394 people are of a different nationality to that of their company's head office. The ACS Group has employees in more than 80 countries, in which it promotes its workers' economic and social development.

Number of Employees by area of Activity	2013	2014	Var.
Construction	87,457	74,440	-14.9%
Industrial Services	41,635	41,272	-0.9%
Environment	94,319	94,581	0.3%
Corporate Unit	52	52	0.0%

[23] The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by number of employees. The data is expressed in terms of percentage of total Group employees at 31/12/14. In order to weigh the data of 2013 Clece employees are included amounting to 65,774 people at 31/12/2013.

Personnel by professional category and area of Activity	Construction	Industrial Services	Environment	Corporate Unit	TOTAL
University graduates	19,000	3,936	1,485	32	24,453
Junior college graduates	3,107	3,512	2,395	46	9,020
Non-graduate line personnel	4,740	6,078	3,775	0	14,593
Administrative staff	4,071	2,519	1,593	10	8,193
Other staff	43,522	25,227	85,333	4	154,086

Types of Contract	2011	2012	2013	2014
Permanent Contracts	95,325	100,132	94,056	82,740
Temporary Contracts	66,937	62,339	129,407	127,605

Personnel by professional category and gender	Women	Men	Total
University graduates	5,713	18,740	24,453
Junior college graduates	3,167	5,853	9,020
Non-graduate line personnel	4,062	10,531	14,592
Administrative staff	5,530	2,663	8,193
Other staff	60,154	93,932	154,086
Total	**78,626**	**131,718**	**210,345**
Proportion of ACS Group total	37.4%	62.6%	

Personnel by Geographic Area	% of total
Europe	58.8%
Americas	18.5%
Asia	10.2%
Africa	1.2%
Oceania	11.3%

5.1.2. Management Principles

5.1.2.1. Equality, Diversity, Integration, Rights

Equality of opportunity, lack of discrimination and respect for human rights, which are basic principles included in the Group's Code of Conduct, are also determining factors when advancing the professional and personal development of all the ACS Group's employees. Companies representing 86.9% of Group employees express their formal, documented commitment to the Universal Declaration of Human Rights in the development of their Human Rights policy.

The ACS Group rejects any type of discrimination, in particular that due to age, sex, religion, race, sexual orientation, nationality or disability. This commitment extends to selection and promotion processes, which are based on assessment of the person's capabilities, on the analysis of the requirements of the job post and on individual performance.

Currently, companies representing 57.0% of ACS Group employees have formal programmes to ensure equality of opportunities. These Equality Plans include specific actions as regards selection and hiring of personnel, salary, training, working days, professional promotion, assistance, bonuses and social, health and occupational risk prevention policies, as well as in matters of gender violence. A total of 1,205 women were reported in management posts in the company in 2014 (12.0% of total management personnel).

The ACS Group also promotes the hiring of people with disabilities and offers them a working environment which enables them to develop under conditions of equality. In this regard, 4,824 disabled people were working in the ACS Group at 31 December 2014.

The ACS Group also understands the relevance that having local roots and being sensitive to each place's particular nature has in the company's success. For that reason, it promotes direct hiring of local employees and managers. The number of executives from the local community totalled 590 in 2014 (5.9% of the Group's total management personnel).

5.1.2.2. Labour Relations

All the ACS Group's employees, including expatriate Spanish workers, are subject to the collective agreements in force applicable to the sector in which they work, as well as the regulations relating to management personnel and, in all cases, the labour legislation in the countries where they work. For example, collective agreements on matters of notice period(s) regarding organisational changes are rigorously respected.

In the field of labour relations, the ACS Group considers dialogue to be an essential element. For this reason, it holds regular meetings with union representatives for all its companies. Of Group employees, 27.7% are members of trade unions or union organisations.

Furthermore, in companies representing 74.6% of ACS Group employees protocols or policies were developed to minimize situations where union rights or rights of association are prohibited or violated in certain countries, it being ACS Group policy to promote good labour practices and respect for the legislation in force.

5.1.2.3. Turnover and Absenteeism Rate

Indicators of turnover and absenteeism	2012	2013	2014
Total staff turnover	15.1%	11.2%	12.7%
Male staff turnover	15.7%	12.1%	13.9%
Female staff turnover	14.8%	9.0%	11.4%
Percentage days lost through absenteeism	4.1%	1.4%	1.3%

5.1.2.4. Services for Employees, Flexibility and Work/Life Balance

Companies in the ACS Group offer employees social benefits of a variety of natures. Worthy of note among these services, going under various names, with differing content and scope of application, are the following:

- Life and accident, travel and health insurance
- Salary advances
- Annual medical checks and medical care
- Assistance for those with children with disabilities
- Help with schooling for children and workers taking courses in official centres
- Economic assistance for food or company canteens
- Company bus service
- Company Welfare programmes
- Agreements with banks
- Commercial discounts in affiliated establishments
- Cultural and social activities

Companies representing 91.42% of Group employees have programmes promoting balance between family life and work available to them.

The following are noteworthy among the different initiatives applied by ACS Group companies to promote balance between family life and work:

- The workforce can take up the offer of flexible working time schemes, with a margin of one hour, to accommodate their periods for entering or leaving work to their personal needs.
- Reduced working day: there are people in ACS who have a working day without a break or who have a reduced day.
- Accumulation of breast-feeding periods.
- Time off or part-time working for fathers and mothers after childbirth.
- Change of work centre due to change of residence.
- Management of shift changes between workers in services.

5.1.2.5. Development of Human Resources:

Employee competences, assessment, development, remuneration and satisfaction

Development of Human Resources (% of total employees)	2012	2013	2014
Employees covered by a formal professional development system	84.7%	87.8%	89.2%
Employees in posts defined according to a formal competency map	14.5%	33.1%	35.4%
Employees subject to performance assessment processes	36.3%	55.5%	51.3%
Employees covered by variable remuneration systems	90.4%	91.3%	91.5%
Of these, the percentage of variable remuneration systems that include aspects related to Corporate Responsibility	47.4%	21.6%	23.0%
Level of coverage of working environment surveys (% of total employees)	50.5%	31.7%	1.6%
Satisfied or very satisfied employees (out of total surveys performed)	78.8%	84.9%	66.2%

The performance assessment models in ACS companies are based on the competences and parameters for each work post, as described in the management systems.

Although the companies manage the professional development of their workforces independently, they all share some common elements, namely:

- They allow the worker to talk about their job situation, express their interests and motivations, both personal and professional, their geographic flexibility, their training interests and their idea of their professional future in the company
- The carrying out of performance assessments using numerous methodologies, including 360º analyses, meetings with clients, periodic follow-up meetings, evaluation of the profitability of the work post compared to the results obtained, etc.
- They enable the company to show a receptive attitude to the information obtained from its workers, in order to be able to deal with their concerns, as far as possible, by implementing corrective actions.
- They allow decision making to be accelerated when selecting appropriate personnel for specific posts, as well as in determining professional promotion or increasing worker employability.
- They enable fair and equitable measures to be established for setting the variable remuneration, in management by objectives, in which the goals the employee needs to achieve to obtain their variable remuneration are agreed systematically and recurrently.
- Compliance with the ACS Group Code of Conduct is confirmed. It is important to emphasise that there is a zero tolerance policy in the ACS Group to breaches of the Code of Conduct. See the section on Ethics in this document.

These methodologies are consolidated and functioning fully in various ACS Group companies.

One of the most significant employee motivation and satisfaction initiatives is the possibility of promotion. The turnover of the ACS Group and its continuous growth generate a significant number of annual promotions among employees who, due to their efforts and effectiveness, are nominated for positions of greater responsibility.

The remuneration model of ACS Group companies includes numerous specific details and characteristics which, in many cases, even convey competitive and operational advantages in sectors such as engineering and works management.

From among these disparate remuneration systems, in the section on commitment to people it is important to analyse whether the use of variable remuneration is common and what the main factors are which influence such remuneration, especially whether these factors are related to sustainability.

These remunerations are calculated in all cases based on operational and economic factors. A small part of the remuneration also depends on objectives as regards Corporate Responsibility, especially in terms of Health and Safety, the Environment and Quality.

Each ACS Group company manages its professionals' development independently, adapting this to its needs and the specific nature of its activities. A significant majority of ACS Group companies adopt competence management models to improve personal knowledge and skills and use training as a tool to achieve ideal performance of the work.

Competence maps, prepared in ACS Group companies, are aligned with the strategy and particular features of each one. These maps, which are reviewed regularly, define the basic and specific competences of each work post which are essential for its effective performance.

Formal processes for measuring employee satisfaction were carried out in 2014, which affected 1.6% of ACS employees. In these satisfaction surveys, on average, 66.16% of employees responded that they were "satisfied" or "very satisfied".

Additionally, other types of tools have been used to assess this aspect:

- Exit interviews carried out when employees leave voluntarily. Frequent in many ACS companies, their aim is to go into the reasons for the worker leaving the company in greater depth and into those aspects they would highlight as negative and as positive.
- Regular interviews with the employee's supervisor. Enabling the employee's situation to be known
- Suggestions box. Collecting workers' ideas, initiatives and complaints.

5.1.2.6. Training Plans[24]

Training	2011	2012	2013	2014
Total teaching hours given	943,890	2,273,361	3,457,414	2,581,675
Teaching hours per employee (over total employees)	5.8	14.0	15.5	12.3
Employees participating in training activities	55,613	114,822	180,143	148,168
Teaching hours per employee (over employees trained during the year)	17.0	19.8	19.2	17.4
Investment in training (€ million)	18.6	87.2	158.2	130.5
Investment in training per employee (over total employees) (€)	114.6	536.6	708.0	620.6
Investment in training per employee (over employees trained during the year) (€)	334.7	759.3	878	881

The ACS Group has programmes for continuous training and skills development, aimed at covering the employees' training wants and needs, as identified during the year and in line with the competences established in the management models. The aim of the training plans is to meet the employees' training needs for correct execution of their work and for their personal and professional development.

The training plans for the different companies are updated regularly to adapt them to the needs of each business and, in the end, of each person. Companies representing 91.61% of Group employees report the existence of tools for managing development of human resources such as training platforms, on-line training or even agreements with training centres. Indeed, there are tools available adapted to the various competence profiles for analysing training needs, disseminating training opportunities, joint databases, specific, adapted and general courses, etc. Specifically, in ACS Group companies, courses are given in areas related to the following aspects, among others:

- Management training
- Technological specialisation in management and production systems
- Knowledge of products and services provided
- Policies on quality and the environment
- Job safety

[24] The contribution from Leighton is included in the information for 2012, 2013 and 2014. This was not included in the 2011 report.

Specifically, an initiative is being carried out at Group level focused on training on Human Rights, Ethics, Integrity and Conduct. As this was dealt with in the section of Ethics, it is included in this part of the report as a summary.

Training in Human Rights, Ethics and the Code of Conduct	2012	2013	2014
Scope of training plans in this regard (% of employees)	20.8%	85.5%	87.0%
Number of courses given with Human Rights, Ethics, Integrity or Conduct content	1,959	778	845
Number of employees trained in Human Rights, Ethics, Integrity or Conduct content during the year	6,928	21,983	17,105
Percentage of total current Group employees who have received at least one course in Human Rights, Ethics, Integrity or Conduct during their career	8.7%	38.1%	36.0%
Training hours per trained employee	N/A	2	3

5.1.3. Main Indicators

Main Management Indicators - People	2012	2013	2014	Objective for 2015
Percentage days lost through absenteeism	4.1%	1.4%	1.3%	< 2013
Employees covered by a formal professional development system	84.7%	87.8%	89.2%	> 2013
Employees in posts defined according to a formal competency map	14.5%	33.1%	35.4%	> 2013
Employees subject to performance assessment processes	36.3%	55.5%	51.3%	> 2013
Employees covered by variable remuneration systems	90.4%	91.3%	91.5%	> 2013
Investment in training per employee (over total employees) (€)	536.6	708.0	620.6	> 2013
Percentage of total current Group employees who have received at least one course in Human Rights, Ethics, Integrity or Conduct during their career	8.7%	38.1%	36.0%	> 2013

5.2. Safety in the Workplace in the ACS Group

5.2.1. Strategic Priorities

The prevention of occupational risks[25] is one of the strategic pillars of all ACS Group companies. Each of these companies and the Group in general maintain the commitment to reach the most demanding standards in this area and so become a reference in health and safety protection, not only for its own employees, but also for its suppliers, contractors and collaborating companies.

The main challenge lies in designing and implementing, in all its operating fields, a risk prevention service which meets expectations. Furthermore, the company considers it fundamental to reinforce its commitment to a risk prevention culture and to optimising resources.

Thanks to the individual commitment of all its employees and the involvement of suppliers, contractors and collaborating companies, the ACS Group continues to advance in building the desired risk prevention culture, approaching its ultimate objective of achieving an accident rate of zero.

5.2.2. Management Model

The ACS Group's risk prevention policy complies with the various Occupational Health and Safety regulations which govern the area in the countries where it is operates, at the same time as promoting integration of occupational risks into the company strategy by means of advanced practices, training and information.

Despite the fact that they operate independently, the great majority of the Group's companies share common principles in the management of their employees' health and safety. These principles are the following:

- Compliance with current legislation on occupational risk prevention and other requirements voluntarily observed.
- Integration of occupational risk prevention into the set of initiatives and at all levels, implemented through correct planning and its putting into practice.
- Adoption of all those measures necessary to ensure employees' protection and well-being.
- Achieving continuous improvement of the system by means of appropriate training and information as regards risk prevention.
- Qualification of staff and application of technological innovations.
- Definition and spreading worldwide of shared, homogeneous standards which enable assessment of Group companies in Safety terms.
- Variable remuneration depending on the success of the risk prevention and safety policy.

5.2.2.1. Systems

The great majority of Group companies report the existence of a health and safety management function and system which deals with the implementation of the policy and of the action plans developed in accordance with the priorities identified. In general, these ACS Group companies share a series of characteristics in risk prevention management:

- Development of systems for management of prevention according to the OHSAS 18001 reference standard. This policy was reported by companies representing 82.80% of Group employees
- The existence of systems audited internally and/or externally, in addition to the audits regulated by law (96.70% of Group employees)

[25] The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by number of employees. The data is expressed in terms of percentage of total Group employees at 31/12/14. In order to weigh the data of 2013 Clece employees are included amounting to 65,774 people at 31/12/2013. The concepts of occupational risk prevention and safety at work are used indistinctly.

- Definition of objectives and planning of preventive actions in the framework of the policy and particular nature of each company, an aspect which affects 97.06% of the Group's employees
- A worldwide system affecting 96.79% of ACS's people

In line with the risk prevention policy, and within these Group companies' management systems, these are the main common characteristics:

- There are systems for regular assessment of the risks to which workers are exposed in companies representing 82.80% of ACS Group employees
- Risk prevention plans are defined which take in the improvements detected in these assessment procedures (97.06% of Group employees)
- Systems which could have resulted in an incident are identified and recorded (analysis of near misses) in companies representing 96.94% of ACS's employees
- Workers' and managers' remuneration are referenced to fulfilment of formal targets as regards health and safety in 57.42% of the ACS Group
- There are integrated computerised systems in the great majority of Group companies, which are used to monitor data related to employee and subcontractor health and safety

The supervision and optimisation of these systems involves setting and monitoring objectives, which are generally annual, approved by senior management and transferred to the company's various levels to be fulfilled.

The Risk Prevention Plans prepared in the Group companies include the conclusions from the regular risk assessments and guidelines for action are laid down for achieving the objectives set. Likewise, in many of the Group's companies, specific assessments are carried out for activities and centres, leading to Specific Risk Prevention Plans.

Along these lines, certain groups of workers who, due to their occupation, are at high risk of contracting specific diseases, are given special consideration. In 2014, there were 2,858 people in this category.

5.2.2.2. Expenditure

Spending on Health and Safety	2011	2012	2013	2014
Spending (€ million)	26.6	220.1	171.7	197.4
Spending per employee (€)	163.7	1,354.8	768.5	938.3

5.2.2.3. Participation of Workers' Representatives

The consolidation of a risk prevention culture in the Group requires the participation of all the employees and, especially, of the workers' representatives, given that they are the communication channel between the workers and the company management.

In Spain, this participation takes place, basically, through risk prevention representatives and, where applicable, the occupational risk prevention committees. Companies or work centres with 50 workers or more have a Health and Safety Committee set up. These Committees are the peer and professional body for participation dedicated to regular and periodic consultation on company actions as regards risk prevention.

The committees are made up of risk prevention representatives, on the one hand and, on the other hand by the employer and/or his or her representatives in an equal number to the prevention representatives. These committees hold quarterly meetings, for which minutes are taken on the matters discussed and the decisions taken. These minutes must be written within the period of one month after the meeting and be presented to the parties for their consultation and comments.

5.2.2.4. Training

Training and information are fundamental to the development of the ACS Group's risk prevention policy and are the most effective medium for sensitising the company's people to health and safety.

Training in Health and Safety	2012	2013	2014
Employees who have received training in Health and Safety matters during the year (%)	58.9%	66.9%	65.4%
Employees who have received training on Health and Safety matters during their career with the company (%)	71.2%	94.2%	96.6%

5.2.2.5. Other Initiatives Related to Health and Safety

Several common characteristics which are worthy of highlighting were found in the study of the Group's different companies:

- ACS Group companies develop measures to guarantee the safety of third parties when they visit the companies' facilities.
- It should be highlighted that, as a general guideline and for companies which contract safety personnel, it is the contracted company which is responsible for providing the corresponding training to ensure the appropriate actions of its employees. In some cases, this training includes specific content on human rights. If any Group company contracts a company which does not meet this requirement, the inclusion is suggested of this human rights training in the recycling courses they carry out with their personnel periodically.

The ACS Group collaborates with organisations specialised in matters of health, safety and risk prevention and actively participates in the main conferences, congresses and forums organised domestically and internationally. This is a way of offering its experience and updating itself on the latest trends and best practices.

The main organisations of which ACS Group companies are part, either as members of their health and safety commissions or committees or by participating through some kind of collaboration are:

SPA	CNC	USA	Associated General Contractors
SPA	AESPLA	USA	ASSE
SPA	SEOPAN	USA	National Safety Council
SPA	Spanish Construction Labour Foundation	USA	General Contractor Association
SPA	PESI	USA	NY Safety Committee
POR	IEFP	USA	Construction Users Round Table
POL	Polish Labour Inspectorate	USA	American National Standards Committee
EU	ENCORD	UK	NISO
AUS	Australian Constructors Association	CAN	Infrastructure Health & Safety Association
AUS	Safety Institute of Australia		
AUS	National Safety Council of Australia		
AUS	Federal Safety Commission Accreditation		

5.2.2.6. Employee Accident[26] Rate Indices

Accident rate indices Employees	2011	2012	2013	2014
Frequency	**24.43**	**27.84**	**19.07**	**15.18**
Construction	10.09	10.70	4.23	2.40
Industrial Services	21.27	16.83	11.95	11.27
Environment	67.93	64.89	39.79	42.69
Severity	**0.75**	**0.73**	**0.55**	**0.38**
Construction	0.33	0.27	0.12	0.08
Industrial Services	0.51	0.54	0.31	0.31
Environment	2.30	1.63	1.16	1.02
Incident rate	**22.63**	**30.20**	**33.24**	**37.29**
Construction	9.31	8.47	8.13	9.37
Industrial Services	25.32	22.39	22.11	22.82
Environment	87.37	109.29	61.00	65.10

5.2.2.7. Accident Rate Indices for Subcontractors

The spreading of the risk prevention culture among suppliers, contractors and collaborating companies is another of the Group's basic lines of action in this subject. Details on the control and management efforts in this area are included in this document in the Suppliers section.

Accident rate indices Subcontractors	2011	2012	2013	2014
Frequency	**8.66**	**6.43**	**7.83**	**9.29**
Construction	8.66	4.77	6.78	8.57
Industrial Services	5.90	6.03	3.28	2.42
Environment	N/A	81.81	143.11	151.67
Severity	**0.07**	**0.13**	**0.16**	**0.14**
Construction	0.07	0.08	0.13	0.06
Industrial Services	0.09	0.09	0.06	0.06
Environment	N/A	2.52	3.53	2.80

[26] Frequency Rate: Number of accidents that have occurred during the working day per million hours worked.

Severity Rate: Number of working days missed due to accidents per 1,000 hours worked.

Incident Rate: Number of accidents with time off per thousand workers.

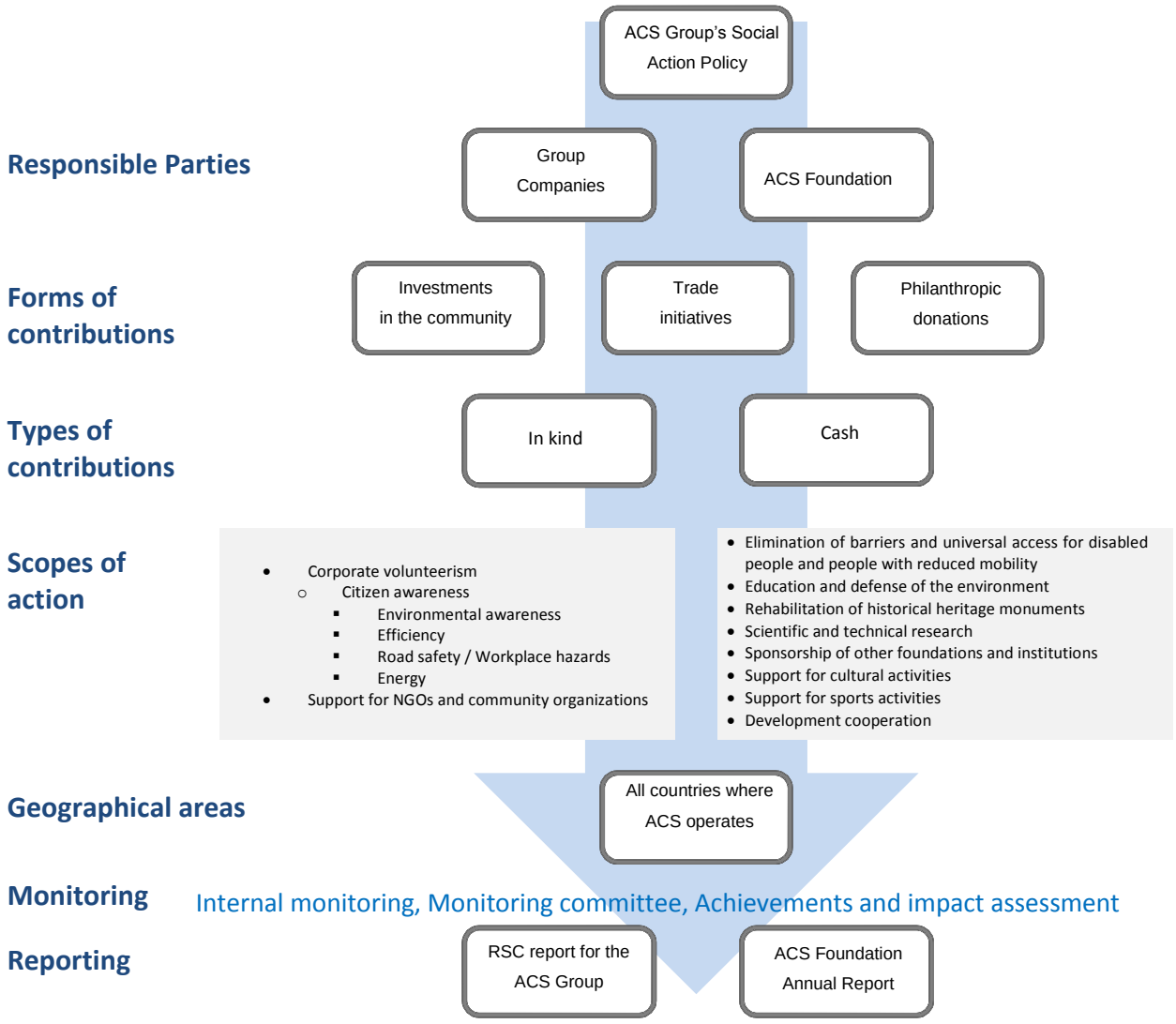
Professional disease rate: Total number of cases of occupational diseases over the total number of hours worked, times 200,000.

5.2.3. Main Indicators

Main Management Indicators - Health and Safety	2012	2013	2014	Objective for 2015
Percentage of total employees covered by OSHAS 18001 certification	88.9%	75.4%	82.8%	> 2013
Frequency Rate	27.84	19.07	15.18	< 2013
Total number of Accidents with employee time off	4,723	7,321	7,801	< 2013
Spending per employee on Safety (€)	1,354.82	768.49	938.31	> 2013
Employees who have received training on Health and Safety matters during their career with the company (%)	71.2%	94.2%	96.6%	> 2013

5.3. Social Action in the ACS Group

A commitment to the betterment of society is part of the ACS Group's mission. To contribute to this goal, ACS establishes a Social Action Policy tied to its business strategy, because it is the best way to create real shared value for all stakeholders.



This Policy seeks to promote the ACS Group's Social Action, which will help the company achieve the following objectives:

- Promote the growth of the business and its sustainability
- Improve the recognition and reputation of the company
- Increase the satisfaction of employees and associates
- Contribute to the improvement of the society in which the ACS Group operates

5.3.1. Action Plan on Social Action

The ACS Group's Social Action Policy is governed by an Action Plan, which sets the procedures for implementation in the Group's various business areas. It has been drafted in accordance with the guidelines and recommendations of the London Benchmarking Group (LBG); it includes the extensive experience gained over the years by the ACS Foundation and covers the current actions by the companies of the ACS Group.

The ACS Group's Social Action Policy will be carried out by both Group companies and the ACS Foundation, with each having differentiated functions and different contributions.

- Group companies: each Group company will have the freedom to select its own social action activities provided they are linked to experience acquired in its business and contribute to the objectives of this policy. The employees of the company may subsequently become involved in these corporate volunteer activities.
  In order to operatively implement this Policy, each company will appoint a social action supervisor. This individual will launch the initiatives, act as contact person for employees wishing to participate in the programmes, coordinate the activities, and conduct the monitoring of the indicators needed to measure the impact of these initiatives.

- ACS Foundation: The Foundation will carry out its own activities, according to its statutes, and may support any Group companies that request assistance for their voluntary corporate initiatives, if appropriate.

Social Action contributions may be in cash or in kind.

The activities under the ACS Group's Social Action Policy will be covered by the following categories:

- Community investments: long-term collaboration with NGOs or community organizations to address various social needs. This category will include Foundation activities that meet this description and citizen awareness activities carried out in Group companies' corporate volunteer programmes.
- Trade Initiatives: support for sponsorship and patronage activities conducted by the Foundation or Group companies. An effort will be made for sponsored initiatives to follow the guidelines of the Social Action Policy.
- Philanthropic donations: occasional support for NGOs or community organizations in response to their occasional or emergency needs. This kind of donations will be carried out primarily by the Foundation, but will also include in-kind support provided for these causes to employee volunteers from the different companies, who have requested and received this support.
- Furthermore, the ACS Foundation may carry out any additional initiatives in accordance with its bylaws, as its Board determines.

The ACS Group's Social Action Policy will be the same for all Group companies and the Group Foundation, and may be implemented and carried out in all countries where the ACS Group operates.

Responsibility for the Social Action policy shall rest with the Executive Vice President of the ACS Group, member of the Board of Directors and Vice President of the ACS Foundation.

5.3.2. Social Action in ACS Group companies

In 2014 companies representing 54.14% of ACS employees carried out Social Action initiatives. For this purpose a total of €4,251,468 has been invested. 9,405 people have benefited from these actions.

"*Compromiso*" Awards at Clece

On 3 March 2015 Clece handed out its "*Compromiso*" (Commitment) Awards: an initiative promoted by the ACS Group company to foster the reintegration of communities that are vulnerable or at risk of social exclusion. For this first round of awards with a prize of €6,000 per category, 157 projects were submitted in the following categories: best social project for the disabled, female victims of domestic violence, persons at risk of social exclusion, and senior citizens.

And the winners were…

PERSONS AT RISK OF SOCIAL EXCLUSION CATEGORY:

Association Line 10, with the "Nuevo Camino 2015" project located in Usera, Madrid. This project worked to provide support to families in difficulties, single mothers, etc., caring for their children so they can work. Its motto was "full commitment to the family."

DOMESTIC VIOLENCE VICTIMS CATEGORY

The Asociación Victoria Fuenlabrada (Madrid), which worked with victims of domestic violence, providing them with support and helping them break the cycle of violence.

ASSISTANCE TO THE DISABLED CATEGORY

The Asociación Dedines (Defence of Disabled Children with Special Needs, or *Defensa del Niño Discapacitado con Necesidades Especiales*), with the project "Summer Camp 2015," where the goal was to combine leisure with helping children with special needs, while also assisting the children's parents over a summer-like period where teachers are on holiday.

SENIOR CITIZENS CATEGORY

The Social Project of the In-Home Medical Therapeutic Team of Hospital Vianorte-Laguna for Dependants. As Europe's second largest palliative care hospital, the hospital cares for ill and dependant persons and their families, both in the hospital itself and in day centres, senior citizens' homes and even at patients' homes.

Clece, with 3,945 employees with some form of disability and with a clear corporate vocation for hiring people at risk of exclusion, is a company that fully focuses on supporting vulnerable communities.

Cobra –"Tapitas de Vida" Project, Colombia

Cobra, through its subsidiary in Colombia, has developed a volunteer initiative among its employees such as the Fundación Sanar, which recycles polypropylene bottle lids to help cancer patients.

Cobra's employees have been able to contribute a total of 91.7 kilos of polypropylene lids since they started work on the programme in 2013.

With this small contribution, together with that of other companies in Colombia, Fundación Sanar has been able to obtain resources to finance the medical, psychological, recreational and social treatment of low-income children that suffer from cancer. It currently supports 350 minors in the foundation.

17 years ago, Sanar launched this programme that now collects around 500 kilos of lids per day, or in its best months, such as December, up to 20 tonnes.

For this programme, Cobra prepared ads and donation centres to motivate the personnel to participate in the campaign.

PUBLICITY ADVERTS

Cobra –"Tapitas de Vida" Project, Colombia

Bridges to Prosperity at HOCHTIEF

In 2014 a focal point of HOCHTIEF's sponsorship activity centred on the Bridges for Prosperity (B2P) initiative, an non-governmental organisation that builds pedestrian bridges in remote regions all over the world, helping local communities to benefit from improved access to trade, education and medical care.

© Bridges to Prosperity

Bridges to Prosperity at HOCHTIEF

Flatiron and Turner have for some years been supporting B2P projects in Central and South America. Flatiron in particular has a commitment as a strategic B2P partner, and makes use of its experience in the construction sector to support the design of the bridge models. In 2014 the company built a 121-metre walkway in Nicaragua, the longest ever built by B2P and HOCHTIEF employees.

In 2012, HOCHTIEF became involved in this charitable undertaking from Germany and the rest of Europe, and currently supports B2P in its projects in Ruanda. In 2014 in that country's western province, a 54-metre walkway was built over a river that could not be crossed in the rainy season.

Collaboration with B2P increases HOCHTIEF's commercial activities, adding a strong element of community involvement. Our participation benefits both sides, and especially the inhabitants of the regions, as the walkways cross rivers that considerably increase their flow during the rainy season, becoming a significant threat or an insurmountable barrier for local residents. The rivers prevent them from gaining access to schools, markets and doctors.

B2P estimates that in the last five years these projects have resulted in a 12% increase in the number of children enrolled in school (8,500 children benefitted), an increase of 24% in medical treatment (17,000 were able to benefit from such services), an increase of 18% in employed women (over 12,800 women), and a 15% increase in local business.

Through its sponsorship programme, HOCHTIEF has a positive impact on the economic and social development of the regions. For example, during the construction stage, HOCHTIEF involves, pays and trains workers in the region. Those people not only learn construction skills, they also learn how to maintain the bridges. Construction materials, such as wood and cement, also mainly come from the surrounding areas and are purchased from local suppliers.

HOCHTIEF also benefits, as ten Group employees work for a set period on each project. In addition to promoting awareness among customers, inhabitants of the regions and government representatives, they encourage the forming of teams and the desire to participate in volunteering activities.

The sponsorship programmes also improve the construction experience of employees, provide intercultural experiences and increase their commitment with society. The satisfaction of belonging to a Group such as HOCHTIEF also increases, as to date around 150 employees have benefitted from this experience.

The aim is to extend these sponsorships throughout the Group, including Leighton in the longer term. More than 71,000 people living close to the bridges have benefitted from out projects during the last five years. This number is set to grow in future.

The development of social action in 2014 is still in its initial stages, and not in vain, since the Group's general policy was approved in May 2014. The goal of the Group's Human Resources offices is to have efforts increase substantially in 2015, just as in previous years.

5.3.3. ACS Foundation

The ACS Foundation, whose formal social action policy is detailed in its founding charter, is guided by several action principles:

- Philanthropic action by means of donations and contributions to specialised institutions.
- Actions in various fields of work: accessibility, assistance to development, environment, cultural and educational promotion, dissemination and restoration of Spanish national heritage, collaboration with scientific institutions and sponsorship and patronage of philanthropic institutions, universities, technical schools and other learning centres.
- Selection of projects which provide the greatest social benefit –carried out with prestigious bodies, leaders in their field– and of great general interest.
- Setting up of mixed monitoring committees, between donor and beneficiary, to monitor the execution of significant projects.

The ACS Foundation was created to return part of the profits generated by our business to society to improve the quality of life of its citizens in any physical, human, training, cultural or environmental aspect and in support of human rights and the achievement of millennium goals.

To carry out this Social Action, the ACS Group's Board approves a budget annually to make it possible to implement projects framed in the Foundation's ideology and charter, which are executed by the institutions that receive them. An agreement is drawn up with each of them to define each party's obligations, so guaranteeing complete transparency in the management of the Foundation.

In 2014, the ACS Foundation spent €4,010 million, equivalent to 94.5% of its budget. A budget of €4.350 million has been approved for 2015.

5.3.4. Foundation Programmes

Category	Amount allocated (€ million)
Elimination of barriers (disability)	0.696
Environment	0.242
Research	0.683
Promotion of cultural activities	1.118
Aid to other foundations and institutions	0.810
Others[27]	0.461
TOTAL	**4.010**

The Foundation's strategy for achieving the ends mentioned above relies on collaboration and economic support linked to the following programmes:

- Improving the quality of life of people with physical or sensory disabilities, or in a status of dependency, by collaborating and providing economic resources, supported by institutions of recognised standing and solvency in this regard, such as the Royal Board on Disability; the Spanish blind charity (ONCE), the Spanish Federation of Municipalities and Provinces (FEMP), various Universities and the United Nations, through the World Tourism Organisation, among others. The following are outstanding among the most significant activities carried out in this programme:
    - Elimination of barriers in favour of people with disabilities.
    - Promotion of accessibility and universal design (training, educational and technical materials) to ensure a future without barriers.
    - Incentives to municipalities to apply universal accessibility criteria in urban development, transport and building, mainly through sponsorship of the Reina Sofía Awards and the carrying out of seminars with Royal Board on Disability.
    - Accessible rehabilitation of the most significant Spanish architectural heritage worldwide, such as the El Escorial, Yuste, Las Huelgas (Burgos) Monasteries, the Convent of Santa Clara (Tordesillas) and the Royal Palace in Madrid,

[27] Personnel and other costs for actions, such as training, payment of teachers, publishing of materials, etc.

which have become examples of the compatibility of maintaining the nature of historical architectural heritage with certain levels of accessibility that enable access to the monuments by people with reduced mobility. This allows active tourism for all, generating income and jobs at a local level, at the same time as contributing the maintenance of the monuments themselves.

- In this way, the ACS Foundation combats the historical discrimination represented by the lack of accessibility to Spanish cultural heritage for this group.
- Spreading of good practices as regards the generation or adaptation of tourist attractions to permit the development of tourism accessible to all. In this regard, the United Nations' specialised agency, the WTO, with support from the ACS Foundation, has produced the first document on the subject "Accessible Tourism for All: Public-Private Partnerships and Good Practices", which will be published shortly in an electronic version by the WTO. This document was inspired by the ACS Foundation's experience in public-private partnerships and has already been announced to over 180 member nations of this global organisation. In the First European Conference on Accessible Tourism held in San Marino in November 2014 and sponsored by the UN-WTO, the ACS Foundation's experiences in this regard were analysed and its efforts were recognised in the San Marino Declaration that resulted from the conference.
- Collaborating with sports institutions which carry out such activities, understanding this as the way of improving people's quality of life, especially with those that facilitate the participation of people with some sort of physical disability, such as the Spanish Paralympic Committee.

- Defence of and support to good practices in relation to the environment. The following are outstanding among the activities carried out:
  - Sponsorship of the Spanish National Congresses on the Environment (CONAMA), in their various editions.
  - Support to training activities at Universities related to the treatment of municipal solid waste, the water cycle, energy, etc.
  - Environmental education programme for the Community of Madrid prior to university entrance level, oriented to include environmental education in the scheduling of the region's educational centres, on subjects related to water, renewable energies, ecosystems, responsible consumption, wastes, protected natural spaces, and biodiversity.
  - Support for research by the CSIC on air quality in urban transportation and on the exposure of passengers.
  - Accessible rehabilitation of the environment.
- Collaborating with and contributing to bodies that improve people's cultural level.
  - In this regard, the ACS Foundation focuses its efforts and resources on supporting Spain's main art galleries, lyrical poetry, courses, seminars and debating forums in various centres on specific cultural activities.
  - Support to providing access to culture for people with disability.
  - Support to exceptional cultural shows: restoration of the Primate Cathedral of Toledo in the celebrations of the fourth century of El Greco.
- Contributing to the dissemination, restoration and maintenance of buildings belonging to Spanish Artistic Heritage.
  - Training activities with various Spanish universities and other institutions regarding the restoration of historic buildings,
  - Accessible rehabilitation of National Heritage's Royal sites.
  - Dissemination of Spanish Historical Heritage through the publishing of books documenting the restoration of 138 buildings, with explanations of the techniques used in each case and of the historical process, the condition of the building and the circumstances that justified their restoration.
  - Support to the dissemination of the Romanesque in Spain, collaborating with the Santa María la Real Foundation.
  - Dissemination of the rehabilitation of archaeological sites, especially at Atapuerca and Los Bañales.
- Support to Research. This programme is mainly oriented towards medical research, including rare diseases. Noteworthy among the most significant are:
  - Niños Jesús University Children's Hospital Biomedical Research Foundation.
  - La Paz University Hospital Biomedical Research Foundation.
  - Pasqual Maragall Private Foundation for Alzheimer's research.
  - Spanish Association of Amyotrophic Lateral Sclerosis (ADELA).
  - Spanish Federation of Neuromuscular Diseases.

- Spanish Cerebral Paralysis Association (ASPACE)
- Spanish Association for the Study of Spinal Medullary Lesion (AESLEME).
- It also collaborates with and supports certain pieces of socio-economic research, such as those carried out by the Spanish Foundation for Research on Rights and Companies (FIDE).

– Aid to other institutions in achieving their ends, provided that these are compatible with the ACS Foundation's ends.

  - Carolina Foundation
  - Universidad Autónoma, Universidad Complutense Universidad Politécnica de Madrid Foundations
  - El Prado Museum
  - Reina Sofía National Art Centre Museum
  - Thyssen Bornemisza Museum
  - Catalan National Art Museum
  - Príncipe de Asturias and Príncipe de Girona Foundations

– Cooperation for development and technical assistance. In order to support the Millennium Goals and respect for human rights, the ACS Foundation has collaborated and contributed with economic resources to improving the quality of life of people, in its broadest sense, in third-world countries, to facilitate or resolve problems in supplying drinking water and drainage, fight against hunger and against malaria, train healthcare personnel and provide technical assistance in various areas, especially as regards solid waste and the training of healthcare personnel. In this regard, our collaboration and assistance apply through such institutions mainly in Sudan, Northern Kenya, Niger, Burundi and Peru, through collaboration with:

  - Médecins sans Frontières
  - AMREF Flying Doctors (African Medical and Research Foundation)
  - Spanish Agency for International Cooperation for Development
  - Madre Coraje Association
  - Emalaikat Foundation
  - Through the strategic alliance with the Spanish Agency for International Cooperation for Development (AECID), technical assistance is provided to this organisation in the framework of the Annual Operating Plan signed between the two institutions. Noteworthy in this regard are the activities undertaken on training the trainers in occupational health and safety techniques, support on the subject of municipal solid wastes and the making accessible of Spanish historical heritage restoration projects in Latin America, carried out by AECID.
  - Also with the Spanish Agency for International Cooperation for Development and the Royal Board on Disability, an Ibero-American meeting is held annually on universal accessibility and historic heritage, the main aim of which is to transfer knowledge on this subject between the participating countries, of which there are between 14 and 16, and to analyse good practices as regards universal accessibility.

– Support to the voluntary efforts of institutions such as the Spanish Development and Assistance Foundation and the Madrid School of Civil Engineers.
– The ACS Foundation makes numerous donations to institutions such as Caritas, the Red Cross and others, as well as to provide for needs created by the devastating effects that various natural disasters may have on certain populations.

6. Awards, Recognitions, Memberships

- The ACS Group has been recognised for its work in the field of sustainability by being included in the Dow Jones Sustainability Index for 2014 and 2015.

- The ACS Group is a signatory to the United Nations Global Compact.

- The ACS Group supports the Carbon Disclosure Project initiative.

- ACS is a world leader in the development of infrastructure concessions, according to Public Works Financing magazine.
- ACS is the sixth largest company in the world by sales figures, according to the ENR magazine ranking published in August 2014. It is the second listed company in that list and the company with the most international business.
- ACS is the 202nd largest company in the world by turnover, according to the ranking in the magazine *Fortune* for 2014.
- The ACS Group is one of Spain's most reputable companies according to the monitor Merco.

7. Principles for the Preparation of the Report

For the ACS Group, the preparation of this Corporate Responsibility Report implies the formalisation of a policy focused on understanding the main dilemmas and challenges faced by the infrastructure development and energy sector and society as a whole. The report considers all the ACS Group's activities as a global operator, in all the countries where it is present. To this effect, the information published includes the operations carried out in the Environment, Construction, Industrial Services and Concessions areas.

The ACS Group has developed tools for the collection and consolidation of both quantitative and qualitative information on sustainability to align the management of all the companies with the ACS Group's strategic priorities. This tool has increased its scope considerably

The information gathered in this report refers, basically, to the 2014 financial year. It also includes information from previous years, depending on its relevance and availability, to enable the readers to be able to form a more complete opinion on the company's development. The quantitative indicators present the ACS Group's evolution in 2014 and, generally, the two previous years.

This report was prepared following the guidelines of the G3.1 version of the Global Reporting Initiative (GRI). In this manner, all issues of relevance to the Company's stakeholders were taken into account. The data and headings explained in this report apply to the Group's companies in accordance with that reported in terms of percentage of total sales. Those cases where the scope is other than 100% are specified clearly in the text and tables.

With respect to the levels of application defined by the GRI, the ACS Group has given this report an A+ rating. Accordingly, the principles and recommendations of the G3.1 guidelines were applied and each chapter details both the organisation's profile and its management approach. Additionally, all performance indicators the guidelines consider to be of principal importance are contained in this report.

The ACS Group has applied the following GRI G3.1 principles for defining the contents and guaranteeing the quality of the information included in this report:

Principle of Materiality

The ACS Group has developed management tools to facilitate operational control of sustainability management and its integration into the businesses. The contents of this tool are aligned with GRI requirements, to the request for information from the selective sustainability stock market indices and by institutional investors and ratings agencies which take matters related to sustainability into account.

Context of Sustainability

The objective of this report is to express the actions of the ACS Group in each of the three sustainability areas: economic, social and environmental. Throughout this report, information is supplied in relation to the context of each of these.

Exhaustiveness

In the preparation process, the coverage and scope of this report was clearly defined, giving priority to information considered to be material and including all significant events that took place in 2014, without omitting information of relevance to the Group's stakeholders. The coverage of the Report was determined in parallel with its content.

In the case that there were changes in the chapters with respect to coverage, these have been indicated.

Additionally, the relevant issues, the indicators included herein and the matters covered by the 2014 Corporate Responsibility Report offer an overview of the significant impacts in the economic, social and environmental fields.

Comparability

As far as possible, the information included in this report has been organised in such a manner that the stakeholders may interpret the changes undergone by the ACS Group with respect to previous years.

Balance

This report includes both positive and negative aspects, in order to present an unbiased image and to enable stakeholders to reasonably assess the Company's actions.

Accuracy and Clarity

This report contains numerous tables, graphs and outlines, the purpose of which is to make the report easier to understand. The information included in the report is meant to be clear and accurate in order to be able to assess the ACS Group's actions. Additionally, as far as possible, the use of technical terms whose meaning may be unknown to stakeholders has been avoided.

Reporting Frequency

The ACS Group has the commitment to report its corporate responsibility actions annually. This Report relates to the Group's actions in 2014 in the economic, social and environmental fields.

Reliability

The reliability of the information included in this 2014 Corporate Responsibility Report was checked by KPMG, the firm responsible for its verification.

8. Scope of the Data

8.1. Clients

Clients	2014
Client management system	97.92%
CRM computerised system Sistema	97.92%
Number of offers made in the year	35.47%
Environmental impact analysis	66.67%
Detailed information or a section related to the RSC	35.34%
Anti-monopoly policy	97.92%
System for measuring client satisfaction	97.92%
Client satisfaction improvement plans	97.92%
Client satisfaction surveys conducted	96.42%
Client satisfaction surveys received	96.42%
“Satisfied” or “very satisfied” client responses, out of total surveys RECEIVED (%)	84.77%
Revenue from clients who responded to the client satisfaction survey.	29.54%
Complaints and claims channel	97.92%
Number of complaints received from clients	23.02%
Number of claims answered	23.02%
Number of claims resolved satisfactorily	23.02%
Comments/suggestions from clients	97.92%

8.2. Quality

Quality	2014
Percentage of sales from activities certified with standard ISO 9001	97.27%
Quality Control Department investments and expenditures for improving quality management procedures	41.00%
Number of quality audits performed	41.00%
Quality control system	97.92%
Formal quality objectives	97.92%
Specific initiatives for improving the quality of services rendered	97.92%
Periodic inspections to verify supplier and subcontractor compliance with the company’s projects	97.92%
Periodic inspections to verify supplier and subcontractor compliance with quality standards	97.92%

8.3. Suppliers

Suppliers	2014
Total number of suppliers	96.37%
Cost of procurement (purchases) made during the year	96.15%
Supplier analysis	97.92%
Percentage of suppliers (over the total number of suppliers) that were covered in the analysis	81.03%
Key suppliers in the analysis	56.40%
Critical suppliers	97.92%
Critical suppliers as % of procurement	79.94%
Percentage of total suppliers representing high economic risk	52.08%
Percentage of total suppliers representing high social risk	32.31%
Percentage of total suppliers representing high environmental risk	32.79%
Compliance with the Code of Conduct in contract clauses with suppliers and subcontractors in the Company	97.92%
Is compliance with the Code of Conduct in contract clauses with suppliers and subcontractors in the Company verified internally or externally?	97.92%
Are suppliers that have adhered to international human rights and labour rights standards valued positively?	97.92%
Are suppliers that have adhered to standards regarding compliance with ethical, social and environmental commitments valued positively?	97.92%
Has the Company developed any initiatives related to sustainability that entailed cost savings?	97.92%
Is the Company conducting an analysis of its suppliers'/subcontractors' carbon footprint?	97.92%
Are there standard systems for certifying suppliers/subcontractors?	97.92%
Are suppliers and subcontractors who are certified in quality aspects (ISO9001) valued positively?	97.92%
Are suppliers and subcontractors who are certified in environmental aspects (ISO14001, EMAS or similar) valued positively?	97.92%
Are suppliers' and subcontractors' labour practises evaluated?	97.92%
Are environmental, social or governance clauses included in contracts so that they will be adopted by suppliers/subcontractors?	97.92%
Percentage of expenditures on procurement covered by these clauses	82.17%
Are internal audits (by the company itself) performed on suppliers?	97.92%
Percentage of suppliers that were audited out of the total number of suppliers	29.73%
Are external audits (by an external company) performed on suppliers?	97.92%
Percentage of suppliers that were audited out of the total number of suppliers	21.12%
Corrective plans for suppliers to improve their performance on economic, social or environmental issues	97.92%
Percentage of suppliers affected by these plans, out of the total number of suppliers	9.51%
Improvement in suppliers after implementation of corrective plans	10.92%
Contracts cancelled due to non-compliance	97.92%
Initiatives for strengthening supplier capabilities	97.92%
Encouragement of using certified/recycled materials	97.92%
Certified wood	22.47%
Wood	83.10%
Recycled steel	46.21%
Steel	83.37%
Recycled Cement/Concrete	21.99%
Cement/Concrete	84.27%
Recycled glass	21.99%
Glass	22.47%

8.4. R&D+I

R&D+I	2014
Investment in R&D+I	40.68%
Specific R&D+I office or department	97.92%
Formal R&D+I management system	97.92%
Audits	97.92%
Number of R&D+I in process as of 31 December	72.73%
Number of patents registered in the year	40.68%
Number of patents registered in the last ten years	35.16%

8.5. Environment

Environment	2014
Percentage of sales covered by certificate ISO14001	73.38%
Percentage of sales not covered by certificate ISO14001 but covered by environmental certification	97.61%
Has the Company developed any environmental initiatives in the past year that entailed decreased costs?	97.92%
Has the Company developed any environmental initiatives in the past year that entailed increased revenues?	97.92%
Consumption of potable water (m3)	30.59%
Consumption of non-potable water (m3)	30.59%
Total waste water (m3)	30.59%
Hazardous waste sent for processing (t)	39.78%
Non-hazardous waste sent for processing (t)	36.12%
Gasoline consumption (millions of litres)	95.79%
Gas oil consumption (millions of litres)	71.56%
Natural gas consumption (m3)	30.59%
Natural gas consumption (kWh)	39.78%
Energy consumption (MWh)	97.92%
Direct greenhouse gas emissions not related to fuel use (t CO_2eq)	58.90%
Business trips total km travelled in short range trips (< 500 km)	69.07%
Business Trips Plane: total km travelled in medium range trips (500 km < X < 1600 km)	69.07%
Business Trips Plane: total km travelled on long range flights (> 1600 km)	69.07%
Business Trips Total km travelled in personal vehicles for business purposes	69.07%
Business Trips Total km travelled in train	37.02%
Business Trips Total km travelled in boat	31.49%
Other (t CO_2eq)	90.94%
Environmental management system	97.92%
Auditing	97.92%
Number of environmental audits conducted in the company	67.20%

Environment	2014
Number of environmental incidents that occurred	67.85%
Remuneration paid to employees, middle managers and/or directors related to compliance with formal environmental targets	97.92%
Non-monetary incentives/recognitions for compliance with formal environmental targets	97.92%
Specific CO_2 reduction targets in the company	97.92%
CO_2 reduction initiatives for the year in the company	97.92%
Quantity of CO_2 emissions prevented during the year due to these initiatives	25.53%
Does the company offer products or services that help clients reduce greenhouse gas emissions (Energy management services, Sustainable construction, renewable energies, etc.)?	97.92%
Have projects been implemented to reduce waste generation?	97.92%
Have projects been implemented to reduce consumption of materials and/or raw materials?	97.92%
Have plans been established to reduce water consumption in the company's activities?	97.92%
Have plans been established to reduce the impact of the company's activities on biodiversity?	97.92%
Specific biodiversity policy	97.92%
Has the company implemented any type of centralised database for collecting environmental data?	97.92%
Does the company have a system for collecting data on environmental near misses?	97.92%
Total surface area of buildings (m2)	39.24%
Environmental certification of buildings	37.45%

8.6. Human Resources

Human Resources	2014
Of the number of employees reported, the number of men	95.33%
Of the number of employees reported, the number of women	95.33%
Of the number of employees reported , the number of employees over 33% disabled	69.35%
Of the number of employees reported, the number of women in managerial positions (Project/Construction Manager or similar or higher)	95.33%
Of the number of employees reported, the number of men in managerial positions (Project/Construction Manager or similar or higher)	95.33%
Of the number of employees reported, number of employees with nationalities different from the company's headquarters (Spain)	72.91%
Of the number of employees reported, number of upper management from the local community (who are not Spanish)	73.55%
Of the number of employees reported, number of employees that belong to a union organisation	95.33%
Of the number of employees reported, number of employees dismissed in the past year	90.02%
Of the number of employees reported, number of employees retired in the past year	69.35%
Of the number of employees reported, number of employees deceased in the past year	65.87%
Of the number of employees reported, number of employees hired	93.42%
Of the number of employees reported, total rotation	95.33%
Of the number of employees reported, men rotated	95.33%
Of the number of employees reported, women rotated	95.33%
Of the number of employees reported, number of employees whose position is defined in a formal competency map	95.05%
Of the number of employees reported, training provided, total class hours	95.15%
Of the number of employees reported, total number of participants in training activities during the year	95.33%
Of the number of employees reported, investment in training (millions of Euros)	95.15%
Of the number of employees reported, number of employees subject to performance evaluation processes	95.33%

Human Resources	2014
Scope of employee satisfaction	98.01%
Number of employees participating in satisfaction surveys	22.07%
Employee satisfaction results	21.36%
Of the number of employees reported, total number of days lost (due to absenteeism)	95.03%
Of the number of employees reported, total number of days worked	95.03%
Has the company developed initiatives in its area of activity in the past year that entailed cost savings?	98.01%
Has the company developed initiatives in its area of activity in the past year that entailed increased revenue?	98.01%
Does the company offer employees a formal professional development system?	98.01%
Does the company offer employees a formal competency management system?	98.01%
Tools for managing human capital development	98.01%
Variable remuneration systems	98.01%
Variable remuneration sustainability objectives	98.01%
Conciliation of work and family life	98.01%
Management and sharing of expertise	98.01%
Adherence to Code of Conduct	98.01%
Has the company developed initiatives for expanding the Code of Conduct?	98.01%
Is there a plan for training in human rights, ethics, integrity or conduct?	98.01%
Number of courses offered human rights, ethics, integrity or conduct	94.87%
Number of employees trained in human rights, ethics, integrity or conduct	94.87%
Class hours on human rights, ethics, integrity or conduct	94.87%
Total percentage of current company employees that have taken at least one course on human rights, ethics, integrity or conduct during their career with the company	94.17%
Formal documented commitment to the Universal Declaration of Human Rights	98.01%
Evaluations of performance in the company and Code of Conduct	98.01%
Zero Tolerance	98.01%
Code of Conduct audits	98.01%
Does the company conduct activities in countries where there is a potential risk of child exploitation or forced labour?	98.01%
Is the right of association and union representation threatened in any of the countries where the company operates?	98.01%
Does the company have formal programmes for ensuring equal opportunities among employees?	98.01%
Number of incidents in the company over the past year due to discrimination	95.33%
Philanthropic activity during the year	98.01%
Investment in social action	58.46%
Social action impact	23.46%

8.7. Health and Safety

Health and Safety	2014
Total percentage of employees covered by certificate OSHAS18001	98.27%
Is the Workplace Health and Safety policy the same for everyone in the company?	98.27%
Has the health and safety management system been audited by an independent external auditor (not including regulatory audits)?	98.27%
Does the company have formal health and safety objectives?	98.27%
Is the remuneration of employees, middle management and directors linked to compliance with the formal health and safety objectives?	98.27%

Are near misses identified and recorded?	98.27%
Investment in workplace health and safety (millions of Euros)	98.27%
Total hours worked by reported employees in the company	98.27%
Total number of hours worked by contractors	65.70%
Total number of accidents suffered by reported employees in the company	98.27%
Total number of accidents suffered by contactors	64.21%
Total number of days lost by internal reported employees	98.27%
Total number of days lost by contractors	63.63%
Total number of accidents with dismissal of reported employees	98.27%
Total number of accidents with dismissal of contractors	64.21%
Total number of cases of occupational illness (internal reported employees)	68.81%
Total number of cases of occupational illness (contractors)	63.74%
Number of hours of training in workplace health and safety provided to employees of the company during the year	68.81%
Did your department develop any initiatives last year that entailed cost savings for the company?	98.27%
Did your department develop any initiatives last year that entailed increased revenue for the company?	98.27%
Percentage of total employees that took a workplace health and safety course in the past year	98.27%
Percentage of total employees that took a workplace health and safety course at least once during their career with the company	98.27%
Total number of employees with occupations at risk of contracting specific diseases.	68.81%

9. Assurance Report

See KPMG annex Document:

10. GRI Index

G3.1 Content Index - Construction and Real Estate Sector Supplement			
	Application Level		A+
STANDARD DISCLOSURES PART I: Profile Disclosures			
1. Strategy and Analysis			
Profile Disclosure	Description	Reported	Cross-reference/Direct answer
1.1	Statement from the most senior decision-maker of the organization.	Fully	Chapter 1. Chairman's Letter
1.2	Description of key impacts. risks. and opportunities.	Fully	3.1.4; 4.1.4; 4.2.4; 4.3.4; 4.5.4
2. Organizational Profile			
Profile Disclosure	Description	Reported	Cross-reference/Direct answer
2.1	Name of the organization.	Fully	2.1.1
2.2	Primary brands. products. and/or services.	Fully	2.2
2.3	Operational structure of the organization. including main divisions. operating companies. subsidiaries. and joint ventures.	Fully	2.2
2.4	Location of organization's headquarters.	Fully	2.1.1
2.5	Number of countries where the organization operates. and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully	2.1.2
2.6	Nature of ownership and legal form.	Fully	2.3.1
2.7	Markets served (including geographic breakdown. sectors served. and types of customers/beneficiaries).	Fully	2.2 4.1.1
2.8	Scale of the reporting organization.	Fully	2.1.2
2.9	Significant changes during the reporting period regarding size. structure. or ownership.	Fully	2.2 2.3.1
2.10	Awards received in the reporting period.	Fully	Chapter 6
3. Report Parameters			
Profile Disclosure	Description	Reported	Cross-reference/Direct answer
3.1	Reporting period (e.g.. fiscal/calendar year) for information provided.	Fully	2.1.2
3.2	Date of most recent previous report (if any).	Fully	Year 2013
3.3	Reporting cycle (annual. biennial. etc.)	Fully	Annual
3.4	Contact point for questions regarding the report or its contents.	Fully	infogrupoacs@grupoacs.com
3.5	Process for defining report content.	Partially	2.2.1.1 The company has not developed a specific study of materiality, but has made an internal exercise involving all businesses considering the priority issues for ACS that are aligned to the GRI requirements. There has been an Improved and increased request for information, not only to meet GRI questions, but also for selective stock indexes in sustainability, and institutional investors and rating agencies that consider sustainability issues.
3.6	Boundary of the report (e.g.. countries. divisions. subsidiaries. leased facilities. joint ventures. suppliers). See GRI Boundary Protocol for further guidance.	Fully	2.2
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	Fully	8,1; 8,2; 8,3; 8,4; 8,5; 8,6; 8,7
3.8	Basis for reporting on joint ventures. subsidiaries. leased facilities. outsourced operations. and other entities that can significantly affect comparability from period to period and/or between organizations.	Fully	2.2
3.9	Data measurement techniques and the bases of calculations. including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply. or to substantially diverge from. the GRI Indicator Protocols.	Fully	2.2
3.10	Explanation of the effect of any re-statements of information provided in earlier reports. and the reasons for such re-statement (e.g..mergers/acquisitions. change of base years/periods. nature of business. measurement methods).	Fully	2.1.2
3.11	Significant changes from previous reporting periods in the scope. boundary. or measurement methods applied in the report.	Fully	2,2
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully	10
3.13	Policy and current practice with regard to seeking external assurance for the report.	Fully	9

4. Governance. Commitments. and Engagement			
Profile Disclosure	**Description**	**Reported**	**Cross-reference/Direct answer**
4.1	Governance structure of the organization. including committees under the highest governance body responsible for specific tasks. such as setting strategy or organizational oversight.	Fully	2.3.1.3 2.3.1.4
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	Fully	2.3.1.3
4.3	For organizations that have a unitary board structure. state the number and gender of members of the highest governance body that are independent and/or non-executive members.	Fully	2.3.1.3
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully	2.3.1 2.3.1.5
4.5	Linkage between compensation for members of the highest governance body. senior managers. and executives (including departure arrangements). and the organization's performance (including social and environmental performance).	Fully	2.3.1.4
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	2.3.2
4.7	Process for determining the composition. qualifications. and expertise of the members of the highest governance body and its committees. including any consideration of gender and other indicators of diversity.	Fully	2.3.1.3
4.8	Internally developed statements of mission or values. codes of conduct. and principles relevant to economic. environmental. and social performance and the status of their implementation.	Fully	3.1.1 3.1.2
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic. environmental. and social performance. including relevant risks and opportunities. and adherence or compliance with internationally agreed standards. codes of conduct. and principles.	Fully	2.3.1.4 3.1.2.2 3.1.2.3
4.1	Processes for evaluating the highest governance body's own performance. particularly with respect to economic. environmental. and social performance.	Fully	2.3.1.4
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Fully	2.3.1.4
4.12	Externally developed economic. environmental. and social charters. principles. or other initiatives to which the organization subscribes or endorses.	Fully	3.1.1 Chapter 6
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	Fully	5.2.2.5
4.14	List of stakeholder groups engaged by the organization.	Fully	2.2.2
4.15	Basis for identification and selection of stakeholders with whom to engage.	Fully	2.2.2
4.16	Approaches to stakeholder engagement. including frequency of engagement by type and by stakeholder group.	Fully	2.2.2
4.17	Key topics and concerns that have been raised through stakeholder engagement. and how the organization has responded to those key topics and concerns. including through its reporting.	Fully	2.2.2

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)			
G3 DMA	**Description**	**Reported**	**Cross-reference/Direct answer**
DMA EC	**Disclosure on Management Approach EC**	Fully	
Aspects	Economic Performance	Fully	2.1.3
	Market presence	Fully	2.1.2
	Indirect Economic Impacts	Fully	2.1.3 5.3
DMA EN	**Disclosure on Management Approach EN**	Partially	
Aspects	Materials	Fully	4.5.2
	Energy	Fully	4.5.2
	Water	Fully	4.5.2; 4.5.4.3
	Biodiversity	Fully	4.5.2; 4.5.4.4.
	Emissions. effluents and waste	Fully	4.5.4.2
	Land Degradation. Contamination and Remediation	Not	
	Products and Services	Fully	4.5.4.2
	Compliance	Fully	4.5.2
	Transport	Fully	4.5.4.1
	Overall	Fully	4.5.2
DMA LA	**Disclosure on Management Approach LA**	Partially	
Aspects	Employment	Fully	5.1.1; 5.1.2
	Labor/management relations	Fully	5.1.2.2.
	Occupational Health and Safety	Fully	5.2.1; 5.2.2
	Training and Education	Fully	5.1.2.3
	Diversity and equal opportunity	Fully	5.1.2.1
	Equal remuneration for women and men	Not	
DMA HR	**Disclosure on Management Approach HR**	Fully	
Aspects	Investment and procurement practices	Fully	4.3.2.1; 4.3.3
	Non-discrimination	Fully	5.1.2.1
	Freedom of association and collective bargaining	Fully	5.1.2.2
	Child labor	Fully	3.1.1; 3.1.4
	Prevention of forced and compulsory labor	Fully	3.1.1; 3.1.4
	Security Practices	Fully	3.1.1; 3.1.4
	Indigenous rights	Fully	3.1.1; 3.1.4
	Assessment	Fully	3.1.1; 3.1.4
	Remediation	Fully	3.1.1; 3.1.4
DMA SO	**Disclosure on Management Approach SO**	Fully	
Aspects	Local communities	Fully	5.3.1
	Corruption	Fully	3.1.1; 3.1.4
	Public policy	Fully	3.1.1; 3.1.4
	Anti-competitive behavior	Fully	3.1.1; 3.1.4
	Compliance	Fully	3.1.1; 3.1.4
DMA PR	**Disclosure on Management Approach PR**	Partially	
Aspects	Customer health and safety	Fully	5.1.1; 5.2
	Product and service labelling	Fully	4.2.1; 4.3.1; 4.4.1
	Marketing communications	Not	
	Customer privacy	Fully	The services provided by ACS are granted to large corporations or public administrations, and therefore the details of the service are defined by contract, that is in general terms public. When it is private, the company withstands and respects strict confidentiality agreements.
	Compliance	Fully	3.1.4 4.5.2

STANDARD DISCLOSURES PART III: Performance Indicators			
Economic			
Performance Indicator	**Description**	**Reported**	**Cross-reference/Direct answer**
Economic performance			
EC1	Direct economic value generated and distributed. including revenues. operating costs. employee compensation. donations and other community investments. retained earnings. and payments to capital providers and governments.	Fully	2.1.3 5.3
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change and other sustainability issues.	Fully	4.5.4.1
EC3	Coverage of the organization's defined benefit plan obligations.	Fully	5.1.2.1
EC4	Significant financial assistance received from government.	Fully	2.3.1
Market presence			
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	Not	
EC6	Policy. practices. and proportion of spending on locally-based suppliers at significant locations of operation.	Fully	4.3.2.1
EC7	Procedures for local hiring and proportion of senior management and all direct employees. contractors and sub-contractors hired from the local community at significant locations of operation.	Partially	5.1.2.1
Indirect economic impacts			
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial. in-kind. or pro bono engagement.	Fully	2.1.3 5.3
EC9	Understanding and describing significant indirect economic impacts. including the extent of impacts.	Not	

Environmental			
Performance Indicator	**Description**	**Reported**	**Cross-reference/Direct answer**
Materials			
EN1	Materials used by weight. value or volume.	Fully	4.5.2 4.5.4.2
EN2	Percentage of materials used that are recycled and reused input materials.	Fully	4.5.4.2
Energy			
EN3	Direct energy consumption by primary energy source.	Partially	4.5.4.2
EN4	Indirect energy consumption by primary source.	Partially	4.5.4.2
CRE1	Building energy intensity.	Not	
EN5	Energy saved due to conservation and efficiency improvements.	Partially	4.5.4.2
EN6	Initiatives to provide energy-efficient or renewable energy based products and services. and reductions in energy requirements as a result of these initiatives.	Fully	4.5.4.2
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Fully	4.5.4.1
Water			
EN8	Total water withdrawal by source.	Partially	4.5.4.3
EN9	Water sources significantly affected by withdrawal of water.	Not	
EN10	Percentage and total volume of water recycled and reused.	Not	
CRE2	Building water intensity.	Not	
Biodiversity			
EN11	Location and size of land owned. leased. managed in. or adjacent to. protected areas and areas of high biodiversity value outside protected areas.	Fully	4.5.4.4
EN12	Description of significant impacts of activities. products. and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Fully	4.5.4.4
EN13	Habitats protected or restored.	Partially	4.5.4.4
EN14	Strategies. current actions. and future plans for managing impacts on biodiversity.	Fully	4.5.4.4
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations. by level of extinction risk.	Fully	4.5.4.4
Emissions. effluents and waste			
EN16	Total direct and indirect greenhouse gas emissions by weight.	Fully	4.5.4.1
EN17	Other relevant indirect greenhouse gas emissions by weight.	Fully	4.5.4.1
CRE3	Greenhouse gas emissions intensity from buildings.	Not	
CRE4	Greenhouse gas emissions intensity from new construction and redevelopment activity.	Fully	4.5.4.1
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully	4.5.4.1
EN19	Emissions of ozone-depleting substances by weight.	Fully	4.5.4.1
EN20	NOx. SOx. and other significant air emissions by type and weight.	Not	
EN21	Total water discharge by quality and destination.	Fully	4.5.4.3
EN22	Total weight of waste by type and disposal method.	Fully	4.5.4.2.
EN23	Total number and volume of significant spills.	Not	
EN24	Weight of transported. imported. exported. or treated waste deemed hazardous under the terms of the Basel Convention Annex I. II. III. and VIII. and percentage of transported waste shipped internationally.	Not	
EN25	Identity. size. protected status. and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	Not	
Land Degradation. Contamination and Remediation			
CRE5	Land and other assets remediated and in need of remediation for the existing or intended land use according to applicable legal designations.	Not	
Products and services			
EN26	Initiatives to enhance efficiency and mitigate environmental impacts of products and services. and extent of impact mitigation.	Partially	4.5.4.2.
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Not	
Compliance			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Not	
Transport			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations. and transporting members of the workforce.	Fully	4.5.4.1
Overall			
EN30	Total environmental protection expenditures and investments by type.	Not	

Social: Labor Practices and Decent Work			
Performance Indicator	**Description**	**Reported**	**Cross-reference/Direct answer**
Employment			
LA1	Total workforce by employment type. employment contract. and region. broken down by gender.	Partially	5.1.1.1
LA2	Total number and rate of new employee hires and employee turnover by age group. gender. and region.	Partially	5.1.2.3
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees. by major operations.	Fully	5.1.2.4
LA15	Return to work and retention rates after parental leave. by gender.	Not	
Labor/management relations			
LA4	Percentage of employees covered by collective bargaining agreements.	Fully	5.1.2.2
LA5	Minimum notice period(s) regarding significant operational changes. including whether it is specified in collective agreements.	Fully	5.1.2.2
Occupational health and safety			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Fully	5.2.2.3
LA7	Rates of injury. occupational diseases. lost days. and absenteeism. and number of work-related fatalities by region and by gender.	Partially	5.2.2.6; 5.2.2.7; 5.2.3
CRE6	Percentage of the organization operating in verified compliance with an internationally recognized health and safety management system.	Fully	5.2.3.
LA8	Education. training. counseling. prevention. and risk-control programs in place to assist workforce members. their families. or community members regarding serious diseases.	Fully	5.2.2.4
LA9	Health and safety topics covered in formal agreements with trade unions.	Fully	5.2.2.3
Training and education			
LA10	Average hours of training per year per employee by gender. and by employee category.	Fully	5.1.2.6
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Not	
LA12	Percentage of employees receiving regular performance and career development reviews. by gender.	Fully	5.1.2.5
Diversity and equal opportunity			
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender. age group. minority group membership. and other indicators of diversity.	Fully	5.1.1.1; 5.1.2.1
Equal remuneration for women and men			
LA14	Ratio of basic salary and remuneration of women to men by employee category. by significant locations of operation.	Not	

Social: Human Rights			
Performance Indicator	**Description**	**Reported**	**Cross-reference/Direct answer**
Investment and procurement practices			
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns. or that have undergone human rights screening.	Fully	4.3.2.1; 4.3.3
HR2	Percentage of significant suppliers. contractors and other business partners that have undergone human rights screening. and actions taken.	Fully	4.3.2.1; 4.3.3
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations. including the percentage of employees trained.	Fully	5.1.2.6
Non-discrimination			
HR4	Total number of incidents of discrimination and corrective actions taken.	Fully	3.1.4; 5.1.2.1
Freedom of association and collective bargaining			
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk. and actions taken to support these rights.	Fully	3.1.4; 5.1.2.2
Child labor			
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor. and measures taken to contribute to the effective abolition of child labor.	Fully	3.1.4
Forced and compulsory labor			
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor. and measures to contribute to the elimination of all forms of forced or compulsory labor.	Fully	3.1.4
Security practices			
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	Fully	5.2.2.5
Indigenous rights			
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	Not	
Assessment			
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	Fully	4.3.3
Remediation			
HR11	Number of grievances related to human rights filed. addressed and resolved through formal grievance mechanisms.	Fully	4.3.2.2; 4.3.4

Social: Society			
Performance Indicator	**Description**	**Reported**	**Cross-reference/Direct answer**
Local communities			
SO1	Percentage of operations with implemented local community engagement. impact assessments. and development programs.	Fully	5.3.1; 5.3.4
SO9	Operations with significant potential or actual negative and positive impacts on local communities.	Fully	5.3.1; 5.3.4
SO10	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	Fully	5.3.1; 5.3.4
CRE7	Number of persons voluntarily and involuntarily displaced and/or resettled by development. broken down by project.	Not	
Corruption			
SO2	Percentage and total number of business units analyzed for risks related to corruption.	Fully	100%
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Fully	3.1.3
SO4	Actions taken in response to incidents of corruption.	Fully	3.1.1
Public policy			
SO5	Public policy positions and participation in public policy development and lobbying.	Fully	2.2.2.1
SO6	Total value of financial and in-kind contributions to political parties. politicians. and related institutions by country.	Fully	2.2.2.1
Anti-competitive behavior			
SO7	Total number of legal actions for anti-competitive behavior. anti-trust. and monopoly practices and their outcomes.	Fully	2.2.2.1
Compliance			
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	3.1.4 4.5.2 5.1.2.1

Social: Product Responsibility			
Performance Indicator	**Description**	**Reported**	**Cross-reference/Direct answer**
Customer health and safety			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement. and percentage of significant products and services categories subject to such procedures.	Fully	4.4.1
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle. by type of outcomes.	Not	
Product and service labelling			
PR3	Type of product and service information required by procedures. and percentage of significant products and services subject to such information requirements.	Fully	4.4.1
CRE8	Type and number of sustainability certification. rating and labeling schemes for new construction. management. occupation and redevelopment.	Fully	4.2.3
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling. by type of outcomes.	Not	
PR5	Practices related to customer satisfaction. including results of surveys measuring customer satisfaction.	Fully	4.1.2.2.
Marketing communications			
PR6	Programs for adherence to laws. standards. and voluntary codes related to marketing communications. including advertising. promotion. and sponsorship.	Not	
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications. including advertising. promotion. and sponsorship by type of outcomes.	Not	
Customer privacy			
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Fully	The services provided by ACS are granted to large corporations or public administrations, and therefore the details of the service are defined by contract, that is in general terms public. When it is private, the company withstands and respects strict confidentiality agreements.
Compliance			
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Fully	3.1.4 4.5.2

11. We would like to hear your opinion

As you have been able to read from the previous pages of this report, at the ACS Group we understand corporate responsibility as a commitment which determines the Company's relationship with the environment and with each of our stakeholders. This Corporate Responsibility Report aims to include the main milestones and programmes carried out by the ACS Group aimed at improving relationships with its different stakeholders.

The ACS Group considers the assumption of corporate responsibility principles to be a continual improvement process, in which it is crucial to count on the opinion of the different stakeholders. Hence, we would be grateful to receive any opinion you may have on this report at:

ACS Group

Avenida de Pío XII, 102

Madrid 28036, Spain

Tel. +34 91 343 92 00

E-mail: infogrupoacs@grupoacs.com

For further information, see the web site, www.grupoacs.com.