



Corporate Responsibility Report of the ACS Group 2013

Madrid, 26 March 2014

MEMBER OF

**Dow Jones
Sustainability Indices**

In Collaboration with RobecoSAM 

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1. Letter from the Chairman

We present you with the ACS Group's Corporate Responsibility Report for another year, including the main policies and initiatives implemented in 2013 in the ethical, operational management and social fields for the various companies that make up the Group around the world.

With a turnover of €38,373 million and 157,689 employees, the ACS Group is a world leader in infrastructure development and is involved in the majority of developed markets through companies which are worldwide benchmarks in operational, technical and organisational aspects. The ACS Group is the market leader in the United States, Asia and Australia, is the second largest in Latin America and fifth in Europe in the infrastructure sector, which is crucial in the social and economic development of the global economy.

Our Corporate Responsibility policy seeks to endorse this global leadership and, to tackle this challenge we launched Project "**one**" in 2013. The objective of this initiative is to promote the best practices to be found in ACS's businesses by spreading and expanding our corporate culture. This project supports the ACS Group's Corporate Responsibility strategy around ethics, efficiency in management activities and appropriate employee development.

We consider **one** to be the most appropriate tool for tackling Corporate Responsibility in a decentralised Group, in which our companies autonomously apply economic, social and environmental initiatives according to their markets and target stakeholders, but with the obligation to share best practices in management and ACS's corporate culture. In practice, Project **one** analyses and evaluates the Group's performance and that of its companies in relation to a scorecard of control indicators aligned with the requirements of the *Dow Jones Sustainability Index*. This process enables us to incorporate improvements periodically, at both a functional and procedural level, in the various Group companies.

The ACS Group's main achievements related to Corporate Social Responsibility in 2013 centre on the level of implementation and adoption of the ACS Group's Code of Conduct, efficiency improvements in approving suppliers and another year of successes achieved in safety terms.

In relation to the level of our implementation of the Code of Conduct, 100% of Group companies had implemented the Code in general terms by the end of 2013, 51.7% of ACS Group employees had received training on Human Rights and ethics in their career in the company and the level of implementation of contractual clauses to fulfil the Code of Conduct in suppliers and subcontractors exceeded 92%. This represents a high level of control and management of the Company's processes to ensure ethical behaviour in its operations.

As regards efficiency, I would like to highlight the efforts made in purchasing departments, suppliers and subcontractors to modernise their management systems and adapt them to the global nature of the Company. This involves augmenting processes to control working capital and carrying out significant initiatives such as supplier approval, which is already implemented in 57.0% of the ACS Group.

Finally, I want to spotlight our firm commitment to safety in the workplace for another year. Across all the business areas we allotted funds totalling €168.1 million, 5.6% of Gross Operating Profit, which were destined for safety-related functions, training and improving management processes. This resulted in a reduction in all our accident rate indices compared to those recorded in 2012.

Our aim for the coming years is to continue promoting management policies aligned with our business culture, enabling us to reassert our leadership in the infrastructure sector by promoting sustainable growth, the profitability of the resources and the creation of value for our shareholders, employees and clients, as well as for all the Stakeholders we relate to.

Florentino Pérez,
Chairman of the ACS Group

2. The ACS Group

2.1. Company Profile

2.1.1. Corporate Strategy

The ACS Group¹ 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 nearly 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 65 countries and employs a total of 157,689 employees. Of these, 43,853 work in Spain and the rest – 113,836 – abroad. The five countries with the highest levels of activity are Spain, Australia, the United States, Germany and Mexico.

In 2013, the year to which this report refers, ACS turned over €38,373 million. This sales figure makes the Group one of the world's biggest construction and services companies² by revenue. It recorded a recurring net profit of €580 million

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

² According to ENR in its August publication Top Global Contractors 2013

and ended the year with an order book of €63,419 million, equivalent to 18 months' activity. At 31 December 2013, the ACS Group recognised equity of €5,489 million and net balance sheet debt of €4,235 million, 14.5% 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 €29,559 million in 2013 and employed 87,457 people; 55.5% 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 €7,067 million in 2013 and employed 28,545 people; 18.1% 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 dumps. Additionally, it offers facility management services for buildings and infrastructures. Net sales totalled €1,781 million in 2013. A total of 41,635 employees participated in its activities; 26.4% of the Group total.

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	2012	2013
Net revenue	38,396	38,373
Gross operating profit EBITDA	3,088	3,002
Gross total investments	2,496	2,484
Recurring net profit	582	580
Net debt	4,952	4,235

Economic value generated, distributed and retained (€M)	2012	2013
Total Income	38,800	38,943
Finance income	508	361
Disposals	4,781	2,008
(1) Economic value generated	44,089	41,312
Operating and purchasing expenses	27,031	27,602
Staff costs	8,681	8,340
Taxes	-1,005	517
Dividends	639	398
Finance expenses	1,295	1,124
Resources for the community	3.89	3.99
(2) Economic value distributed	36,640	37,980
Economic value retained (1-2)	7,449	3,332

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		Dragados Industrial Group ⁶

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.

2.2.1. Project one

To face up to the challenge of coordinating the ACS Group's Corporate Responsibility policy, given its characteristics of operational decentralisation and geographical scope, what is to become the functional, strategic and operational paradigm related to the ACS Group's Corporate Responsibility over the coming years, known as Project one, was developed in 2013.

³ Dragados, Vías, TECSA, Geocisa, Drace, POLAQUA, Pulice, Picone, Schiavone, Dragados USA & Canada, Iridium and Dragados Poland

⁴ Cobra, ETRA, SEMI, MAESSA, IMESAPI

⁵ HOCHTIEF Américas, HOCHTIEF Europe and Leighton

⁶ Dragados Offshore, CYMI, MASA, SICE, INITEC, INTECSA, MAKIBER



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, comparing them with the overall average for ACS, the companies heading their business area and the main competitors acknowledged for their good practices in the field of Sustainability.

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 exercise of information, dissemination and improvement of good practices takes place from the ACS corporation as a link between all the companies in this field.

In practice, Project one analyses and evaluates the performance of the Group and its companies in relation to a scorecard of control indicators, aligned with *Dow Jones Sustainability Index* requirements, 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	2012	2013	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	N/A	52%	> 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	7%	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%	92%	> 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 through clauses related to the Code of Conduct (% of sales)	35%	37%	N/A
Communications received by the Ethical Channel	11	27	N/A

Main Management Indicators - Clients	2012	2013	Objective for 2015
Number of client satisfaction surveys carried out ⁷	1,290	2,363	> 2013
Number of client satisfaction surveys received	860	1,214	> 2013
Percentage of client responses of "satisfied" or "very satisfied" over the total number of surveys RECEIVED (%)	86.2%	87.6%	> 2013
Number of complaints received from clients	2,839	26,459 ⁸	< 2013
Number of complaints dealt with	98.8%	100.0%	= 2013
Number of complaints satisfactorily resolved (proportion of those received)	85%	97%	= 2013

Main Management Indicators - Quality	2012	2013	Objective for 2015
Percentage of sales from activities certified under the ISO 9001 standard (%)	72.5%	72.7%	> 2013
Number of Quality audits per million euros of turnover	0.041	0.029	> 2013
Intensity of investment in measures to promote and improve Quality (€ investment per €million of turnover) ⁹	348	116	> 2013

Main Management Indicators - Suppliers	2012	2013	Objective for 2015
Analysis of supplier and subcontractor criticality	49.6%	77.6%	> 2013
Inclusion of compliance with the Code of Conduct in supplier and subcontractor contract clauses	82.7%	92.0%	> 2013
Existence of formal systems for supplier and subcontractor approval	47.3%	57.0%	> 2013
Carrying out of internal audits on suppliers and subcontractors	18.8%	7.3%	> 2013
Development of corrective plans for suppliers and subcontractors to improve their performance in economic, social or environmental matters	15.9%	53.7%	> 2013

⁷ In the client satisfaction survey indicators, the scope of the data increased from 37% in 2012 to 75.7% in 2013

⁸ An increase in the scope of the report occurred in this indicator, as ACS's activities in Argentina are included, which were not reported in 2012. ACS mainly carries out street collection and cleaning activities in Argentina, which is an activity that brings it very close to consumers and where a large number of complaints are processed.

⁹ A 58% decrease has occurred in investment in ACS Group company Quality Departments

Main Management Indicators - R&D+i	2012	2013	Objective for 2015
Investment in R&D+i (€ million)	49.0	44.5	> 2013
Level of implementation of a specific R&D+i department	87.0%	90.5%	> 2013
Level of implementation of a formal system for R&D+i management	60.4%	84.5%	> 2013
Main Management Indicators - Environment	2012	2013	Objective for 2015
Percentage of sales covered by ISO14001 Certification	68.0%	65.5%	> 2013
Total Water consumption (m ³)	10,067,651	30,389,759	N/A
Ratio: m ³ of Water / Sales (€ million)	262.2	792.0	< 2013
Direct emissions (Scope 1) (tCO ₂ equiv.)	322,758	351,021	N/A
Scope 1 Carbon Intensity Ratio: Emissions / Sales (€ million)	8.4	9.1	< 2013
Indirect emissions (Scope 2) (tCO ₂ equiv.)	392,331	346,861	N/A
Scope 2 Carbon Intensity Ratio: Emissions / Sales (€ million)	10.2	9.0	< 2013
Indirect emissions (Scope 3) (tCO ₂ equiv.)	1,451,662	5,147,151	N/A
Scope 3 Carbon Intensity Ratio: Emissions / Sales (€ million)	37.8	134.1	< 2013
Total Emissions (tCO₂ equiv.)	2,166,750	5,845,034	N/A
Total Carbon Intensity Ratio: Total Emissions / Sales (€million)	56.4	152.3	< 2013
Non-hazardous waste sent for management (t)	1,274,102	3,115,697	N/A
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	33.2	81.2	< 2013
Hazardous waste sent for management (t)	88,182	268,135	N/A
Ratio: Tonnes of hazardous waste / Sales (€ million)	2.3	7.0	< 2013

A methodology has been adopted in this report to account for CO₂ emissions in both 2012 and 2013 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 1 emissions do not include data from Leighton as the company's systems do not allow emissions for the report's year of reference before it ends.

Included under Scope 3 emissions in 2013 is Leighton's information that was not included in 2012. This contributes 1.4 million tonnes of CO₂ as a consequence of the carbon footprint of its suppliers in its mining activity. Furthermore, Urbaser has developed an emissions measurement system which has enabled it to increase the scope of its Scope 3 emissions measurement. This represents an increase compared to 2012 emissions of nearly 2 million tonnes of CO₂.

Water consumption in 2013 was affected by the inclusion of data from Leighton, adding 8.8 million m³ of water, and the inclusion of Tedagua in Cobra, also in 2013, contributing 10 million m³.

Main Management Indicators - People	2012	2013	Objective for 2015
Percentage days lost through absenteeism	4.1%	2.1%	< 2013
Employees covered by a formal professional development system	84.7%	85.5%	> 2013
Employees in posts defined according to a formal competency map	14.5%	36.9%	> 2013
Employees subject to performance assessment processes	36.3%	51.6%	> 2013
Employees covered by variable remuneration systems	90.4%	94.0%	> 2013
Investment in training per employee (over total employees) (€)	536.6	543.4	> 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%	51.7%	> 2013

Main Management Indicators - Health and Safety	2012	2013	Objective for 2015
Percentage of total employees covered by OSHAS18001 certification	88.9%	70.8%	> 2013
Frequency Rate	27.84	15.14	< 2013
Total number of Accidents with employee time off	4,723	4,326	< 2013
Spending per employee on Safety (€)	1,354.82	1,066.11	> 2013
Employees who have received training on Health and Safety matters during their career with the company (%)	71.2%	89.5%	> 2013

The increase in the percentage of employees who have received Ethics courses during their career is due in large part to the increase in the scope of the data, which went from 29% of employees in 2012 to 98% in 2013.

In the Frequency Rate, the scope of the employees covered for 2012 is 52% and for 2013 is 99%. This is due to Leighton not reporting its information for 2012, but doing so for 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 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 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 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. 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 meetings¹⁰, 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.

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 2013, 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 2013:

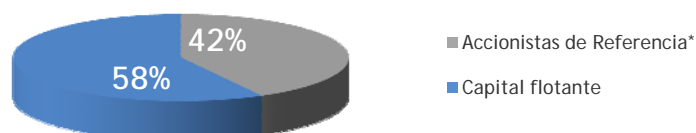
Shareholder's name or corporate name	Number of shares	Percentage of the total number of shares
Corporación Financiera Alba, S.A.	51,305,942	16.30%
Inversiones Vesán, S.A.	39,397,625	12.52%
Sayglo Holding, S.L.	17,741,012	5.64%
Mr. Alberto Cortina Alcocer	12,277,713	3.90%
Mr. Alberto Alcocer Torra	11,502,616	3.66%

¹⁰ The ACS Group made no financial or in kind contributions to political parties during 2013. The Subsidies received by the ACS Group in 2013, as shown in the Group's Consolidated Balance Sheet, included in the Economic/Financial Report published together with this Report, totalled €49.8 million.

The information obtained from IBERCLEAR, the Spanish Central Securities Depository, for the call to the company's most recent General Shareholders' Meeting, held on 10 May 2013, showed a total of 47,237 shareholders. There were 42,857 resident minority shareholders, who held 15.2% of the share capital. There were 4,380 non-resident shareholders and domestic institutional shareholders with a remaining stake of 84.8%.

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:

Capital ownership distribution



* Representation on the Board.

ACS stock	2011	2012	2013
Closing Price	EUR 22.90	EUR 19.04	EUR 25.02
<i>Appreciation of ACS shares</i>	-34.71%	-16.86%	31.41%
<i>Appreciation of the IBEX35</i>	-13.11%	-4.66%	21.42%
Maximum closing price	EUR 37.94	EUR 25.10	EUR 25.02
Minimum closing price	EUR 21.75	EUR 10.38	EUR 16.76
Average price over the period	EUR 29.67	EUR 16.77	EUR 21.11
Total volume (thousands)	220,147	227,383	201,945
<i>Average daily volume of shares (thousands)</i>	857	888	792
Turnover (€million)	6,531	3,812	4,248
<i>Average daily turnover (€ million)</i>	25.41	14.89	16.66
Number of shares (millions)	314.66	314.66	314.66
Capitalisation at the end of the period (million)	7,206	5,991	7,873

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 2013, annual profitability of 25.28%. If he or she had invested €100 on that day, at the end of 2013 he or she would have had €4,613, meaning that the investment would have multiplied by 46.13. 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 215 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 13 took place in 2013.

- **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 2013, 372 problems raised by the shareholders were dealt with, of which 100.0% received a satisfactory solution to the problem (as stated by the shareholders).
- **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 2013: 6 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
Website visits	524,149
Pages viewed	2,265,282
Unique visitors	402,805
Pages per visit	4
Average visit time (mins)	2.26
% New visitors	76.8%

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 2013.

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 2013, ACS's Board of Directors was made up of 17 Board Members: 4 executive members, 8 members representing major shareholders, 4 independent members and 1 external member. There is one woman board member representing major shareholders, Sabina Fluxá Thienemann¹¹. The ACS 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. The number of women Board Members represents 5.88% of the total number of members of the Board of Directors. Although this is less than half, it must be borne in mind that all the vacancies occurring on the Board in recent years have been closed or filled by a woman.

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	Year of birth	Board Member	Year of birth
Florentino Pérez Rodríguez	1947	José María Loizaga Viguri	1936
Antonio García Ferrer	1945	Pedro López Jiménez	1942
Pablo Vallbona Vadell	1942	Juan March de la Lastra	1973
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 Landiribar	1951	Julio Sacristán Fidalgo	1940
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:

¹¹ 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

- 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

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 2013 was €12.6 million, 1.8% 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)	10,793
Value of the overall remuneration corresponding to rights accumulated by the Board Members as regards pensions (€ thousands)	1,805
Overall remuneration to the Board of Directors (€thousands)	12,598
Total remuneration of Senior Executives (52 Executives, €thousands)	24,638

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
Shareholders Present	208	213	115	179	216	226
Quorum Shareholders Present	7.66%	19.44%	19.93%	20.55%	20.05%	20.19%
Shareholders Represented	2,763	2,776	2,183	2,792	2,368	2,214
Quorum Shareholders Represented	70.88%	58.22%	57.11%	54.41%	51.40%	55.06%
Quorum Total	78.54%	77.66%	77.04%	74.96%	71.45%	75.25%

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 Conduct¹² 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.

¹² The ACS Group's Code of Conduct can be seen at http://www.grupoacs.com/index.php/es/c/responsabilidadcorporativ_eticaiprofesionalidad

- **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. See the section
- Equal opportunities
- Non-discrimination
- Confidentiality in information management, when applicable
- 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 79.8% 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 where 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 82.8% of Group employees report the existence of a specific training plan in matters of Human Rights, Ethics and Integrity and Conduct. A total of 629 training courses, attended by 77,350 employees, were given in this field in ACS in 2013. Indeed, the level of penetration of training in terms of Human Rights, Ethics and Integrity and Conduct has already reached 51.7% of the Group's total number of employees.
- 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 49.3% of ACS employees. Additionally, compliance with the precepts of the Code of Conduct is confirmed in 63.0% 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 98.6% 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 6.7% 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 92% of sales explicitly include compliance with the ACS Code of Conduct in the contracts they sign with Suppliers and Subcontractors. Furthermore, 37% internally or externally verify such compliance. Companies representing 80% 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 2013, the Group's Contract managers reported that only in companies representing 0.7% of total turnover were situations faced in which they needed to act against monopoly practices. Leighton, in turn, published a detailed antitrust policy, affecting 38% 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 April 2013, 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.

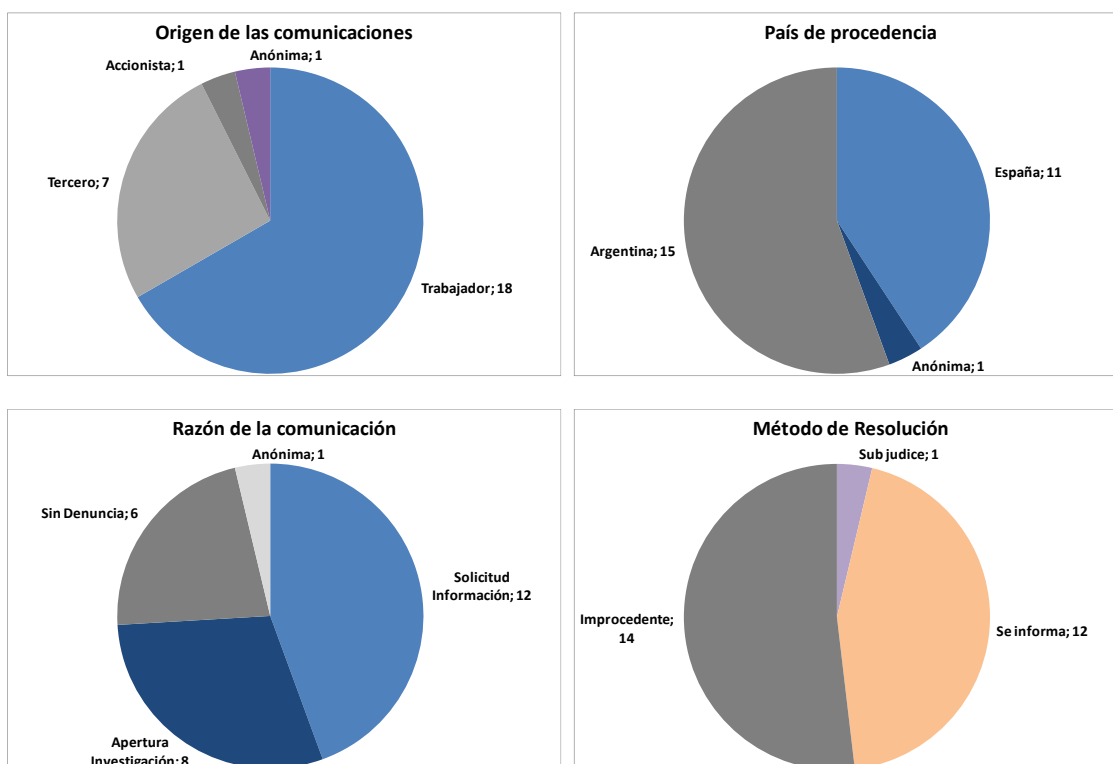
- The high level security measures laid down in Spanish Royal Decree 1720/2007, of 21 December, approving the Regulations developing the Organic Law on Data Protection must be implemented.

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 27 communications were received in 2013, which due to defects in form, the Code of Conduct Monitoring Committee not being the competent body or other reasons for inadmissibility did not lead to the opening of any cases. In all cases the means used was the digital channel.

The details of the communications received are as follows:





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 disseminating the good practices developed by Project one.

Main Management Indicators - Ethics	2012	2013	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	9%	52%	> 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	7%	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%	92%	> 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 through clauses related to the Code of Conduct (% of sales)	35%	37%	N/A
Communications received by the Ethical Channel	11	27	N/A

The increase in the percentage of employees who have received Ethics courses during their career is due in large part to the increase in the scope of the data, which went from 29% of employees in 2012 to 98% in 2013.

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 6.7% 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, 63.0% of Group employees specifically deal with matters of compliance with subjects related to the Code of Conduct in their performance assessments.
- Risk in terms of forced labour or child labour. Companies representing 11.0% of Group employees have identified this risk as material. Of these, 100.0% have developed specific protocols or policies to reduce this risk.
- Risks in terms of respect for rights of association or union representation. Companies representing 11.5% of Group employees have identified this risk as material. Of these, 1.8% have developed specific protocols or policies to reduce this risk.
- Risk in terms of discrimination/equality. Companies representing 81.0% of Group companies have formal programmes to ensure equality of opportunities among workers and in 80.4% of the Group initiatives have been developed to expand on the regulations in countries where they operate. As such, no incidents of discrimination were reported in 2013, compared to 3 reported in 2012.
- 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 8.9% 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 2013, companies representing 73.2% of ACS Group¹³ 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

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 2013.

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 2013, companies representing 52.7% 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 57.0% 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 55.5% 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 64.7% 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	Objective for 2015
Number of client satisfaction surveys carried out	1,290	2,363	> 2013
Number of client satisfaction surveys received	860	1,214	> 2013
Percentage of client responses of "satisfied" or "very satisfied" over the total number of surveys RECEIVED (%)	86.2%	87.6%	> 2013
Number of complaints received from clients	2,839	26,459	< 2013
Number of complaints dealt with	98.8%	100.0%	= 2013
Number of complaints satisfactorily resolved (proportion of those received)	85%	97%	= 2013

In the client satisfaction survey indicators, the scope of the data increased from 37% in 2012 to 75.7% in 2013

An increase in the scope of the report occurred in the Complaints indicator, as ACS's activities in Argentina are included, which were not reported in 2012. ACS mainly carries out street collection and cleaning activities in Argentina, which is an activity that brings it very close to consumers and where a large number of complaints are processed.

4.1.4. Risks

In specific terms related to sustainability:

- 61.6% of tenders presented to clients include an environmental impact analysis
- 35.3% of tenders to clients include a detailed information section on the ACS Group's Corporate Responsibility policies
- Furthermore, companies representing 67.6% of ACS's sales report that their clients have required details on the company's ethical policies in 2013

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 74.8% of ACS Group sales¹⁴ presented some form of quality management system in 2013. In this period and as a consequence of these systems, the ACS Group invested a total of €4.45 million in promoting quality¹⁵.

These quality systems are audited regularly in order to certify Group activities, mainly according to the ISO 9001 standard, held by companies representing 72.7% of the Group's sales.

Production certified under ISO 9001	2011	2012	2013
Construction	71.4%	67.1%	67.6%
Industrial Services	94.7%	92.0%	93.5%
Environment	75.1%	89.2%	82.1%
ACS Group	77.1%	72.5%	72.7%

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.

¹⁴ 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 2013.

¹⁵ A 58% decrease has occurred in investment in ACS Group company Quality Departments

The quality management for the ACS Group's various companies sets general quality objectives for the following financial year. In 2013, companies representing 96.3% 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.

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 83.1% of ACS Group sales carried out at least one initiative of this type in 2013.

4.2.3. Main Indicators

Main Management Indicators - Quality	2012	2013	Objective for 2015
Percentage of sales from activities certified under the ISO 9001 standard (%)	72.5%	72.7%	> 2013
Number of Quality audits per million euros of turnover	0.041	0.029	> 2013
Intensity of investment in measures to promote and improve Quality (€ investment per € million of turnover)	348	116	> 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 76.0% of ACS Group sales carry out regular inspections to check quality. Additionally, companies representing 58.28% of the Group's sales carried out independent audits in 2013. A total of 1,097 quality audits were carried out in the year.

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 37.4% 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 suppliers¹⁶ 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.

¹⁶ 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 2013.

- 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 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 57.0% 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 in supplier approval (% of ACS Group sales)	2012	2013
Adherence to the ACS Group Code of Conduct	82.7%	92.0%
Adherence to international standards as regards human rights and labour rights	54.7%	79.7%
Adherence to standards for fulfilment of commitments in ethical, social and environmental matters	44.4%	79.7%
Certification in quality aspects (ISO9001)	67.1%	66.4%
Certification in environmental aspects (ISO14001, EMAS or similar)	64.6%	74.2%
Analysis of labour standards and practices of suppliers and subcontractors	66.7%	79.1%

Additionally, companies representing 13.6% 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	2012	2013
Percentage of recycled aggregate	0.8%	0.8%
Percentage of certified wood	0.9%	1.3%
Total wood purchased (t)	410,428.0	493,348.6
Percentage of recycled steel	46.7%	38.4%
Total steel purchased (t)	663,781.0	1,370,317.4
Percentage of cement / concrete with recycled aggregate	0.3%	0.2%
Total cement / concrete purchased (t)	4,977,600.0	6,508,294.3
Percentage of recycled glass	0.0%	99.8%
Total glass purchased (t)	159.0	21,692.9

An increase in the scope of the Steel and Concrete data occurred on including data from 2013 from a larger number of companies in the reporting process. The scope for concrete went from 55% of sales to over 74%.

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 7.3% of ACS Group sales report carrying out internal audits of suppliers (affecting an average of 35.2% of suppliers) and 54.8% report that they carry out independent audits (affecting an average of 19.0% of suppliers). Specifically, compliance with the ACS Group Code of Conduct by suppliers is verified internally or externally in companies representing 37.3% 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 94.9% 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 77.6% 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 (representing 23.5% of ACS Group sales), 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 76.5% of Group sales, such critical suppliers have been detected.

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

- 54.5% of the suppliers to these companies are covered by this analysis.
- Of these, 22.3% are considered critical suppliers.
- These suppliers represent 32.4% 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	Objective for 2015
Analysis of supplier and subcontractor criticality	49.6%	77.6%	> 2013
Inclusion of compliance with the Code of Conduct in supplier and subcontractor contract clauses	82.7%	92.0%	> 2013
Existence of formal systems for supplier and subcontractor approval	47.3%	57.0%	> 2013
Carrying out of internal audits on suppliers and subcontractors	18.8%	7.3%	> 2013
Development of corrective plans for suppliers and subcontractors to improve their performance in economic, social or environmental matters	15.9%	53.7%	> 2013

An increase in the scope of the Supplier data occurred on including data from 2013 from a larger number of companies in the reporting process. The scope for critical suppliers went from 68% of sales to over 95%.

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, 9.6% of Group suppliers represent high risks in economic terms (solvency, delivery dates), 8.9% in social terms (human rights, forced labour, health and safety risks) and 2.0% in environmental terms (lack of environmental certification). In this latter case, additionally, companies representing 47.5% 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 53.7% of ACS Group sales. In these companies, 4.5% of suppliers were affected by these plans. Of these, 100.0% improved their performance after the plan was presented. The main examples of actions dealt with improving technical quality, health and safety aspects and environmental performance.
- Companies representing 77.1% 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 52.0% of the Group total, initiatives have been implemented in the purchasing and supplier management departments which have resulted in project cost savings.

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+i¹⁷ 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 52.0% of ACS Group sales in 2013.

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 25.3% of Group sales. Furthermore, independent audits are carried out in companies representing 21.1% of sales.

¹⁷ 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 2013.

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 2013, the ACS Group had 247 projects in progress and had registered 7 patents during the year.

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 €44.5 million in research, development and innovation in 2013, which represents a decrease of around 9.3% compared to 2012.

4.4.1.1. Construction

The majority of ACS Group Construction¹⁸ companies have a system for managing research, development and innovation. Such a system is reported by companies representing 44.5% 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 153 projects in progress at the end of 2013, managed by the different R&D+i managements. ACS's Construction companies invested €15.3 million in R&D+i during the financial year, nearly 38.5% less than that spent in 2012.

Dragados - Rehabcar Project (road and motorway refurbishment)

The Rehabcar Project (road and motorway refurbishment) started in 2010 and was completed in December 2013. Rehabcar tackled a problem centred on the fact that many roads, highways and motorways needed profound refurbishment, both to meet new criteria for road safety and to be able support heavy traffic and high loading over the coming decades. Once this need for refurbishment had been identified, the project pursued the objective of transforming existing road surfaces and structures into economically sustainable, high quality infrastructures. This way of working went far beyond simple corrective maintenance.

The project involved a thorough understanding of all the actions for refurbishment of existing infrastructures, focusing on three main areas of work:

- Design of refurbishment. Basically using automatic tools to support topographic survey work.
- Reinforcement of road surfaces
 - Making optimum use of the existing structure and materials in the road, with the environmental and economic advantages this represents. To do this, inspection methods were defined which were especially aimed at identifying the potential of the existing road, to convert it into a durable road surface.
 - The characterisation of new materials for designing sustainable, durable structures.

¹⁸ 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 - *Rehabcar* Project (road and motorway refurbishment)

- The carrying out of simulations, testing and the use of a test stretch to compare various novel refurbishment methods and to develop planning, construction and monitoring methods for the new road surfaces.
- Repair, reinforcement and/or modification of overpasses and viaducts
 - Throughout their service life, structures are subject to environmental and mechanical actions that can cause damage and progressive deterioration, affecting their durability, functionality and safety. Indeed, the deterioration detected in a significant portion of reinforced concrete infrastructures led to the need to develop rigorous methods for assessing existing structures to determine their condition and estimate the need for any intervention, as well as the development of “technical intervention priority” indicators to be applicable to the series of structures in a road network.
 - Once the need to act on an existing structure had been decided, the operations to be carried out could be separated into two differentiated groups. The first was the refurbishment, repair to and/or reinforcement of existing structures which had suffered deterioration for any reason (atmospheric agents, impacts, excessive loading, etc.). The second was action on a structure to improve its functionality (commonly carriageway widening). In some real cases the intervention on the existing structure took in both aspects.

The achievement of these advances was made possible by the work carried out over the life of the project by a consortium of industrial partners including Dragados (project coordinator), Geocisa, Iridium, Asfaltos Augusta, VSL and Torroja Ingeniería, supported by a series of technological and research centres and universities, including CARTIF, CSIC-CISDEM, the Universidad de Cantabria and the Universidad Politécnica de Cataluña.

This project was financed initially by the Ministry of Science and Innovation and finally by the Ministry of Economy and Competitiveness under its INNPACTO sub-programme, framed within the National Scientific Research, Development and Technological Innovation Plan 2008-2011.

Dragados - *TailorCrete* Project (optimising design and construction of structures with complex shapes in exposed concrete)

The TailorCrete Project (*New industrial technologies for tailor-made concrete structures at mass customised prices*) began in 2009 and ended in 2013. This had the objective of developing the necessary systems, tools and knowledge to optimise the design and manufacturing processes for concrete structures with great complexity in terms of their geometry (double curvature), as this process is generally very inefficient in these types of structures from the economic and productive point of view.

To achieve this optimisation, work was carried out in the lines of research affecting the various stages in the construction process for the structure, from design to execution. Noteworthy results were achieved in all of these stages. The lines of work resulted in the following developments, among others:

- Digital design, production and manufacturing software tools enabling the design of complex concrete elements to be parameterised, facilitating the design and manufacture of the necessary formwork and reinforcement to form these elements.
- New formwork systems based on the use of unusual materials, such as wax or expanded polystyrene, the fabrication process for which is based on the use of automated systems. This provides them with a high level of adaptability to complex shapes and minimal environmental impact due to the high level of reusability and/or recycling of the materials used.
- Robotic system for producing highly complex three-dimensional metal reinforcement meshes.
- Numerical simulations and experimental testing for pouring self-compacting concrete, either mass or reinforced with metal fibres, enabling optimisation of composition by linking its rheological properties in the fresh condition to the behaviour expected in the hardened state.

All the systems and tools developed in the project have been validated technically at full scale by executing concrete elements ranging from factory prototypes to a highly complex structure, given the double curvature and large dimensions, executed on site.

The achievement of all these advances was made possible thanks to the work over the four years of the project of an international consortium of industrial partners covering the full production chain, from design to execution, including

Dragados - *TailorCrete* Project (optimising design and construction of structures with complex shapes in exposed concrete)

Dragados, Bekaert, Unicon, Paschal, Superpool, Grace and MT Hojgaard, supported by a series of partners from the academic and research world, including the Danish Technological Institute (project coordinator), Chalmers University of Technology (Gothenburg), the Czech Technical University, the Eidgenössische Technische Hochschule Zürich and the University of Southern Denmark.

This project was financed by the European Commission, framed in its Seventh Framework Programme for Research and Development.

Geocisa – SKIDSAFE Project

Between 1 November 2009 and 31 December 2013, the European project “SKIDSAFE: Enhanced driver safety due to improved skid resistance” was carried out with financing within the EU’s Seventh Framework Programme.

Participating in the consortium, led by Delft University of Technology (Netherlands), were IFSTTAR (formerly LCPC, France), Ooms Civiel bv (Netherlands), Aggregate Industries (United Kingdom), the University of Athens (Greece) and GEOCISA, through its Road Management and Conservation and R&D+i Departments.

The SKIDSAFE project is defined as the challenge of developing a micro-mechanical, multi-physics computational model for predicting the progressive loss of skid resistance at the dry and wet tyre/road surface interface as a function of the composition of the asphalt mixture and the traffic and meteorological conditions to which it is subject. To do this it is critical to characterise exhaustively the materials that make up the road surface layer; from the petrography of the aggregates, measurement of aggregate micro-texture and mixture macro-texture to the mechanical characterisation of the asphalt mixtures.

The most innovative aspect of the material characterisation within the SKIDSAFE project was the development of a new laboratory test to measure the adhesion between the tyre rubber and a surface (which can be an asphalt mixture, but can also be natural stone or concrete). All of this is under controlled conditions of pressure, skidding speed, the presence of water on the surface, etc.

The parameters obtained in the laboratory enable modelling of the interaction between the tyre and the road with numerical methods, making it possible to simulate any combination of aggregates, grain size, wet or dry conditions, stress conditions (generated by a vehicle manoeuvre) appropriately.

Application programmes were developed in the final phase of the project, based on the laboratory testing and the numerical simulations, permitting practical, everyday use in road engineering.

4.4.1.2. Industrial Services

The ACS Group’s Industrial Services¹⁹ 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 73.2% of Industrial Services’ sales reported the existence of a specific R&D+i department in their structure.

Total investment of €22.2 million was allocated to the executing the 76 projects managed by the different departments, 38.7% more than in 2012. These projects are carried out by virtue of a formal research and development management system, which is implemented in companies representing 85.4% 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 – HYSOL Project

¹⁹ 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 are expressed in terms of percentage of total Industrial Services area sales.

Cobra – HYSOL Project

The HYSOL Project, led by COBRA and jointly financed by the European Union, seeks to develop a new type of hybrid technology to contribute to sustainable development efficiently and cost effectively. This new technology will combine the COBRA Group's experience in solar thermal energy with its experience in combined cycle power plants, creating a unique capable of resolving the main problem with renewable generation: the intermittent nature of generation.

The project will include a gas turbine in COBRA's solar thermal plants by means of a sophisticated heat recovery system and will include a system for producing natural gas from renewable sources. The COBRA Group will be able to install 100% renewable plants that generate energy reliably regardless of the meteorological conditions.

HYSOL technology arises as a response to a recurring demand from our clients: reliable, profitable renewable energy. The new HYSOL configuration is being designed with flexibility as the top design criterion, so that it can be installed in any electrical system and operate as a base load or a plant to cover peaks.

The project, coordinated by COBRA, is being executed by a consortium of eight leading European companies and research groups and will be installed in COBRA's Innovation and Development Centre in Castile-La Mancha. The project will have an estimated duration of three years and will result in numerous patents and a prototype which will be used to validate the technology and resolve any doubts our future clients around the world may have. For further information: <http://www.hysolproject.eu>.

SICE - ADILUX (adaptive and efficient regulation of interurban lighting systems)

To contribute to the fulfilment of current energy efficiency policies, all those installations that consume energy need to be managed efficiently, especially those with the worst performance, as is the case of urban and street lighting systems.

According to data from a study carried out by the Universidad Politécnica de Madrid (UPM), 44% of municipal energy consumption is due to public lighting, indicating that Spain has extravagant public lighting, characterised by extremely high levels of outdoor lighting. Furthermore, public lighting consumption represents 1.5% of total electricity and has an annual growth rate of 2.6%.

It is, therefore, essential to be ready, in technological terms, to promote the implementation of urban lighting management systems that improve energy efficiency based on the level of service demanded (capable of adapting lighting intensity, in real time, to the context and need).

From this perspective, the "ADILUX" system has been developed to enable regulation of the lighting level by adapting it to the traffic conditions, i.e. changing the lighting levels according to traffic intensity, the speed of the vehicles, the weather/visibility and other variables measured by the traffic control systems.

The intention with this system is to find a balance between the safety roadway lighting systems provide and energy consumption that can often be a waste, given that there are interurban areas where there is scarcely any traffic at certain times, where lighting to the maximum level would not be necessary.

For real deployment of the system, the use of LED-type lamps on interurban roads was proposed due to the ease of regulating its intensity which, combined with its energy efficiency, makes them very attractive for these types of systems that permit instantaneous regulation from 0 to 100%.

The system developed incorporates SICE's μ ETD product, a very low power consumption (max. 3 W) traffic data capture station - *Estación de Toma de Datos de tráfico* (ETD) - with a device for remote control of lamps point-to-point using Zigbee wireless communications.

An algorithm, embedded in the μ ETD itself, calculates the appropriate lighting level for each lamp or group of lamps, taking into account factors such as speed, traffic intensity and the topology of the road or junction itself and energy efficiency and road safety criteria.

From this perspective, the ADILUX system was proposed. This evaluates the need for lighting (vehicles passing or not, etc.) and regulates the lighting using safety and efficiency criteria. In this way, so-called demand management (unifying consumption and need for use), as proposed by ADILUX, is one of the criteria involved in the devising Smart Cities.

Proof of the novel nature of the development was the special mention the Jury at the Second Innovation Gallery in the International Road Safety and Equipment Fair (TRAFIC 2013) gave the Adilux product in the Road Sustainability category.

Pilot scenario

SICE - ADILUX (adaptive and efficient regulation of interurban lighting systems)

The ADILUX system was installed on an access road leading to the A-2 (towards Madrid) in the Guadalajara municipal area.

The unusual feature of this is that it is a T-junction, hence it controls the passing of vehicles on the main branch and the secondary road. This site was selected as it takes factors related to road safety into account as conflicts can occur between vehicles that can join the main branch from the secondary road.

After the study, considering road safety criteria, it was decided to establish different regulation for the lamp close to the junction than the rest of the lamps (10 in total), as the former is regulated considering road safety criteria and the other considering criteria related to energy efficiency, maintaining the lighting parameters regulated by roadway regulations in all cases.

In this way, when vehicles are detected on the secondary road, the first lamppost (close to the junction) is regulated at maximum intensity to facilitate visibility at the junction. Meanwhile, the lighting intensity for the other lamps is linked to the traffic intensity, average speed and visibility relationship measured by the detectors and sensors installed on the main road.

If there are no vehicles on the secondary road, the lamp follows the regulation criteria established for the rest of the LED lamps.

Within these limits, various lighting configurations were established and tested, ranging from the most demanding case: case 1, with very high traffic speed (> 60 km/h) and high traffic density (more than 24 vehicles every 5 minutes), and the least demanding case: case 15, with moderate traffic speed (< 30 km/h) and very low traffic density (less than 6 vehicles every 5 minutes).

The latest tests were carried out during December, using the simplified method for measuring mean illuminance or the nine-point method laid down in the Technical Application Guide to Complementary Technical Instruction ITC-EA-07.

To make these measurements, it was necessary to stop the traffic and force the lighting to percentages of 50%, 70% and 100%. The tests showed that the installation had been carried out correctly and that the system works properly.

SICE – MoveUs Project

From four different countries (Italy, Finland, the United Kingdom and Spain), the eleven project partners, including SICE, held the kick-off meeting for the MoveUs Project on 24 and 25 October last year. This is aimed at designing, implementing, testing and exploiting a platform based on cloud computing technology and mobility services.

MoveUs has a European focus as it includes smart city pilots in Madrid, Tampere and Genoa. The project objective seeks a change in mobility habits of European citizens through the provision of personalised, smart information on transport services, helping people to decide the best transport option and providing important feedback on energy savings and efficiency according to the resulting data. A series of recommendations will be provided which, supported by incentives, are aimed at promoting the most sustainable modes of mobility, as well as public transport.

The information from a wide variety of means of transport and mobility systems (buses, bicycles and/or shared cars, etc.), from traffic management systems, traffic control vehicles and users' mobile devices, will be integrated and processed in a novel, high capacity platform, permitting:

- Measurement of the rhythm of urban mobility from an overall perspective
- Information to be obtained on traffic evolution and the use of public transport
- Identification of the most environmentally friendly ways of moving as those that improve energy efficiency

Unified under the Living Lab framework, the city's representatives will be thoroughly committed to the project: city councils, public mobility and transport operators, citizens and technological centres. This will ensure broad, effective participation by users as regards the use of smart mobility services.

ETRA – SIRCI Project: Bogotá Integral Transport System

ITS System for Mass Transport management. (BRT -Bus Rapid Transit) TRANSMILENIO, controlled by ETRA systems, was dimensioned by the following figures in 2011:

- Passengers transported: 2,659,954,955
- Average number of passengers at peak hours: 174,368
- Average passengers per day over year: 1,500,000
- Stations Operating: 114
- Kilometres of route in trunk operation: 84 km
- Trunk fleet available: 1,109 Buses
- Information panels at stations: 359
- Average speed of trunk fleet: 27 km/hour

From that time and thanks to ETRA's development, system effectiveness has been evaluated based on four main indicators:

Accident rate: Statistics show a reduction of up to 85% in the accident rate and in the case of those with a fatal outcome, up to 90%. A reduction of 83% has also been achieved in robberies, due to increased police presence and a more comfortable, secure setting.

Increase in commercial speed. Commercial speeds in public transport before the implementation of the BRT system of operation were between 4 km/h and 12 km/h on the main roads. These speeds increased to an average of 27 km/h and user journey times fell by 32%.

Accessibility The trunk system is fully accessible to users with physical disabilities and also facilitates access for senior citizens, children and pregnant women. It has been calculated that 1% of system users (9,500 people per day) have some kind of disability or limitation.

Quality and consistency. The system has very high levels of acceptance, in response to the high standards demanded for implementing the infrastructure and operating the services. The satisfaction surveys on the service carried out with users show this.

With this background, Recaudo Bogotá S.A. was awarded the implementation and operation of the SIRCI project in 2012. Within this contract, Recaudo Bogotá, through LGCNS, awarded ETRA with the supply of the on-board equipment to expand the feeder and trunk system on 659 buses and the management system for the whole Bogotá Integral Transport System (SITP) fleet, with forecast figures for 2014 of:

- Average Integral Transport System passengers per day over year: 6,175,000
- Percentage of trunk network passengers: 40%
- Trunk fleet available: 1,950 Buses
- Zonal fleet available: 10,570 Buses
- Total Integral Transport System Fleet: 12,519 Buses

ETRA – WisePARK Parking Meters: Advanced controlled parking management

The WisePARK parking meter enables effective parking management in cities, as well as being a very attractive, innovative and modern model for urban furniture.

The WisePARK system brings a new concept in controlled parking service management and operation to reality, from the first design paradigm to the last technical detail.

WisePARK is highly adaptable to urban furniture, as it enables customisation in the form of colours or textures, for example, and has customisable side panels.

WisePARK is suitable for use by people with reduced mobility, incorporating all its elements within the heights laid down by the current accessibility standards (EN 12414 standard for people with reduced mobility).

ETRA – WisePARK Parking Meters: Advanced controlled parking management

The main features of the WisePARK parking meter are as follows:

- Ease of use. Clear, simple interface, with navigation buttons, keypad and colour screen.
- Different means of payment:
 - Payment in cash, coins
 - Payment with bank credit or debit cards
 - Use of Pre-paid Cards
 - Payment by cell phone
 - Contactless cards (RFID)
- Maximum security. Vandal-proof design and sliding protection door.
- Energy efficiency and sustainability. Low-consumption design, adjustable solar panel, option for use of two batteries.
- Ease of maintenance.
- Advanced monitoring.
- Real time operating control.
- Advanced metering and penalty management.

4.4.1.3. Environment

In the ACS Group's Environment²⁰ 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 has its 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.

A Strategic Plan for R&D+i is determined annually or biannually, setting the priority lines in R&D+i for the company and framing the projects to be carried out. At 31 December 2013, there were 18 research and development projects in progress, in which €6.9 million were invested, 14.5% less than in 2012.

Urbaser - Innovations in processes to convert wastes to resources

Urbaser has been carrying out projects for several years aimed at exploiting the various wastes generated in its activities for managing them. Currently taking form is the concept of using discards produced in daily activities to use them as resources in different sectors, so closing the production cycle and achieving has come to be called the circular economy.

Urbaser, in harmony with strategic R&D lines from both the European Union and the Spanish Government, has specifically carried out projects aimed at obtaining fuels, in their different states – gaseous, liquid or solid – from wastes.

These projects have the dual objective of, on the one hand, reducing our impact on the environment by reducing the CO₂ emitted and, on the other, making our activities more efficient.

An initial project develops the gasification process applied to refuse from Municipal Solid Waste, MSW, plants to obtain a high quality synthesis gas which is valid for use in internal combustion engines or for chemical synthesis (production of methanol, ammonia or second generation fuels). Its objectives, among others are:

- Carrying out experimental plant testing and studies on the gasification process studied at laboratory level in the preceding OTERSU+ project.
- Studying the different process variables to achieve a more efficient process and to reduce the wastes produced in

²⁰ The data referring to Environment included in this section were calculated by analysing the information provided by Urbaser.

Urbaser - Innovations in processes to convert wastes to resources

it.

- Gasification of other materials from MSW plants.

After carrying out the work, the results obtained were:

- Taking out of a process patent.
- Preparation of a quality synthesis gas from the gasification of RDF with air.
- Catalytic reforming of the tars generated in gasification.
- A gasification process simulation model is available.
- A public private partnership is maintained with the Universidad de Zaragoza for new technological development projects and job creation.

A second project consisted of developing a process to obtain a fuel that can be used in internal combustion engines from various plastic wastes.

The facility consists of a feed system, a stirred tank type thermal cracking reactor, a fixed-bed catalytic reforming reactor and a rectification column.

The objectives were as follows:

- To demonstrate the viability of the process for converting polyolefin plastic wastes into fuels.
- To select, condition and characterise the polyolefin plastic wastes to be used as raw materials in the process.
- To prepare, characterise, study and optimise the properties of the catalytic systems that have given the best results at laboratory scale with the aim of maximising the production of diesel oils, paying special attention to their deactivation resistance.
- To optimise the operating conditions (temperatures, flow rates and time) with the catalytic system or systems that have given the best results.

The main results from this project are:

- Taking out of a process patent.
- Design of a demonstration scale facility for studying process economic viability.

The objective of the third project is to obtain an optimum quality Solid Recovered Fuel, SRF, from the biostabilised fraction and the reject fraction from municipal wastes. To do this, the project has focused on improving fuel homogeneity and technical parameters.

Among the objectives are:

- Technical definition of the various processes to obtain the quality demanded.
- Evaluation of the behaviour of the SRF as a fuel in clinker kilns.
- Analysis of CO₂ emissions and comparison with other fuels.
- Environmental and economic viability study on SRF.
- Study of potential as biostabilised biomass.

The main results from this project are:

- Production of a procedure for specific conditioning for each of the MSW fractions under study.
- Obtaining of an SRF which can be used in the cement industry and is applicable to other energy-intensive industries.
- Life cycle analysis of processes for generating the SRF through recovery.

Urbaser – Development of business models in the field of Smart Cities

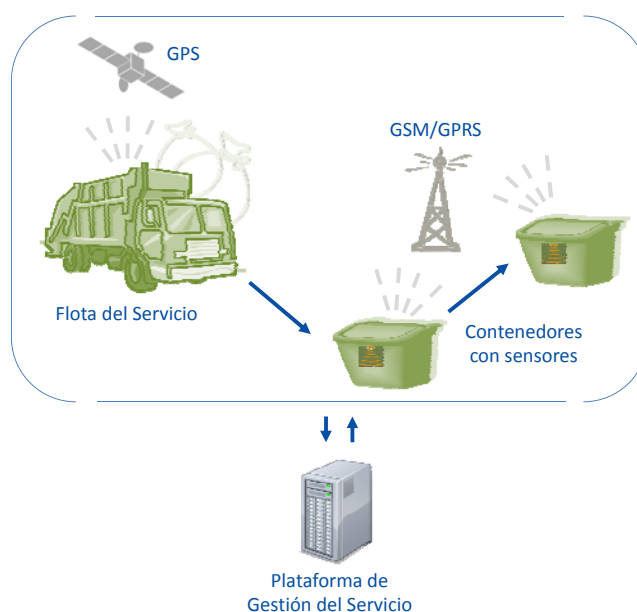
In order to promote and develop new business models under the Smart Cities concept, a variety of actions have been carried out in Urbaser, the main result of which is the definition of a vision coherent with market realities and using the competencies acquired in each of the services it offers its clients.

For effective execution of urban services of street cleaning, urban waste collection and appropriate treatment, park and green space maintenance and management, water management and energy management (street lighting, building maintenance, road signalling and public fountains) in current cities, there are a series of factors which condition the various possible solutions.

Urbaser is aware that it will only be possible to satisfy the new requirements and ways of acting in urban service provision in cities through solutions integrating human, technological and economic resources, with sufficient flexibility to offer the best quality/price ratio. This flexibility is summarised as having various effective solutions available which, depending on the budget available, cover a range from a basic solution to a more technologically advanced solution and which in all cases are adaptable to each specific need, achieving maximum efficiency in any case.

Technology plays a leading role in the effectiveness and improvement of urban services, not only technologies for managing and treating wastes, but also the information and communications technology (ICTs) that support appropriate management and the optimisation of urban services. There are solutions in the technological field that promote the continuous improvement of services. However, they need to be seen as a means and not an end in themselves in the evolution towards smart cities and this is why we need to keep working on the design of models based on realistic indicators that guarantee reasonable service quality.

Some examples of the ICTs applied in a current street cleaning and collection service are: the installation of sensors and communication software in waste collection vehicles, enabling the measurement of pollution levels, vehicle consumption, distance travelled, etc. – which enables collection routes to be optimised, gives knowledge on air quality by zone, etc. – volumetric sensors installed in collection containers to give information on fill levels; moisture sensors in gardens to optimise irrigation, among others.



Technological outline of the application of volumetric fill sensors in containers and vehicle fleet management.

In conclusion, work needs to continue on the changes needed in standards to facilitate the design and introduction of new smart services, as well as into new technological developments to enable improvements to citizens' quality of life.

4.4.2. Main Indicators

Main Management Indicators - R&D+i	2012	2013	Objective for 2015
Investment in R&D+i (€ million)	49.0	44.5	> 2013
Level of implementation of a specific R&D+i department	87.0%	90.5%	> 2013
Level of implementation of a formal system for R&D+i management	60.4%	84.5%	> 2013

4.5. Environment

4.5.1. Strategy

The ACS Group²¹ 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 programs 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:

Level of implementation of good environmental management practices in the ACS Group (Expressed as % of sales)	2012	2013
Implementation of an environmental management system	55.8%	98.9%
Implementation of ISO 14001 certification	68.0%	65.5%
Implementation of certifications other than ISO 14001	10.6%	11.2%
Existence of specific targets for reducing CO ₂ emissions	71.3%	74.5%
Execution of projects to reduce waste generation	73.2%	95.4%
Existence of plans to reduce water consumption	15.1%	53.0%
Setting of objectives to minimise the impact of the company's activities on biodiversity	32.8%	55.8%
The remuneration of workers, middle management and/or executives is linked to the achievement of formal environmental objectives	25.0%	10.3%

²¹ 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 2013.

Level of implementation of good environmental management practices in the ACS Group (Expressed as % of sales)	2012	2013
There is some kind of non-economic incentive/recognition for the achievement of formal environmental objectives	0.1%	43.1%
The environmental management system has been audited by an external independent third party	55.8%	77.8%
Number of environmental audits carried out in your company	724	1,811
Number of environmental incidents which occurred	967	719
Existence of a system for collecting data on environmental near misses	33.0%	16.9%
Existence of a centralised database to collect data on environmental matters	71.6%	60.3%

An increase in the scope of a large part of the Environment data occurred, mainly due to the inclusion of information from HOCHTIEF and Leighton, meaning that the scope went from 55% of sales to over 98%.

The significant level of implementation of an environmental management system, present in companies representing 98.87% 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 65.52% of ACS Group sales²².

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

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.**

²² Other certifications cover 11.23% of Group sales and companies representing 5.75% of ACS's sales have analysed the possibility of implementing SA8000 certification.

4.5.3. Main Indicators²³

Main Management Indicators - Environment	2011	2012	2013	Objective for 2015
Percentage of sales covered by ISO 14001 Certification	72.6%	68.0%	65.5%	> 2013
Total Water consumption (m ³)	5,577,931	10,067,651	30,389,759	N/A
Ratio: m ³ of Water / Sales (€ million)	151.3	262.2	792.0	< 2013
Direct emissions (Scope 1) (tCO ₂ equiv.)	1,742,344	322,758	351,021	N/A
Scope 1 Carbon Intensity Ratio: Emissions / Sales (€ million)	47.3	8.4	9.1	< 2013
Indirect emissions (Scope 2) (tCO ₂ equiv.)	151,738	392,331	346,861	N/A
Scope 2 Carbon Intensity Ratio: Emissions / Sales (€ million)	4.1	10.2	9.0	< 2013
Indirect emissions (Scope 3) (tCO ₂ equiv.)	13,620	1,451,662	5,147,151	N/A
Scope 3 Carbon Intensity Ratio: Emissions / Sales (€ million)	0.4	37.8	134.1	< 2013
Total Emissions (tCO₂ equiv.)	1,907,702	2,166,750	5,845,034	N/A
Total Carbon Intensity Ratio: Total Emissions / Sales (€ million)	51.7	56.4	152.3	< 2013
Non-hazardous waste sent for management (t)	1,168,706	1,274,102	3,115,697	N/A
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	31.7	33.2	81.2	< 2013
Hazardous waste sent for management (t)	186,989	88,182	268,135	N/A
Ratio: Tonnes of hazardous waste / Sales (€ million)	5.1	2.3	7.0	< 2013

* due to employee travel and to the supply chain

²³ A methodology has been adopted in this report to account for CO₂ emissions in both 2012 and 2013 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 1 emissions do not include data from Leighton as the company's systems do not allow emissions for the report's year of reference before it ends.

Included under Scope 3 emissions in 2013 is Leighton's information that was not included in 2012. This contributes 1.4 million tonnes of CO₂ as a consequence of the carbon footprint of its suppliers in its mining activity. Furthermore, Urbaser has developed an emissions measurement system which has enabled it to increase the scope of its Scope 3 emissions measurement. This represents an increase compared to 2012 emissions of nearly 2 million tonnes of CO₂.

Water consumption in 2013 was affected by the inclusion of data from Leighton, adding 8.8 million m³ of water, and the inclusion of Tedagua in Cobra, also in 2013, contributing 10 million m³.

4.5.4. Risks

Level of implementation of good environmental management practices in the ACS Group. 2013 (Expressed as % of sales)	Construction	Industrial Services	Environment
Implementation of an environmental management system	99.2%	98.9%	100.0%
Implementation of ISO 14001 certification	63.1%	73.4%	80.2%
Implementation of certifications other than ISO 14001	14.6%	0.0%	0.0%
Existence of specific targets for reducing CO ₂ emissions	88.1%	13.3%	100.0%
Execution of projects to reduce waste generation	96.1%	93.3%	100.0%
Existence of plans to reduce water consumption	57.1%	25.7%	100.0%
Setting of objectives to minimise the impact of the company's activities on biodiversity	66.0%	3.7%	100.0%
The remuneration of workers, middle management and/or executives is linked to the achievement of formal environmental objectives	5.5%	9.6%	100.0%
There is some kind of non-economic incentive/recognition for the achievement of formal environmental objectives	50.0%	1.7%	100.0%
The environmental management system has been audited by an external independent third party	71.9%	98.9%	100.0%
Number of environmental audits carried out in your company	1,281	377	153
Number of environmental incidents which occurred	445	33	241
Existence of a system for collecting data on environmental near misses	10.4%	25.1%	100.0%
Existence of a centralised database to collect data on environmental matters	68.7%	16.6%	100.0%

4.5.4.1. Climate Change

The ACS Group shares with society the growing concern over climate change, hence it has an active policy for reducing its greenhouse gas emissions in companies representing 79.26% of ACS Group sales.

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, responsible for around 60% of the Group's emissions, 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 for both 2012 and 2013 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 10.32% 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, the emission reduction initiatives carried out by ACS Group companies saved 0 tonnes of CO₂ equivalent in 2013.
- 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 and monitoring of suppliers.
- The financial consequences of climate change for each company's business has begun to be measured. Indeed, companies representing 19.3% of Group sales already carry out this type of analysis.

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 CO₂ 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 31/12/2013, the total wind power installed in Spain was 547.7 MW. These farms produced a total of 1,166.5 GWh during 2013²⁴
- Outside Spain at 31/12/2013, there were 128 MW in Portugal that generated 305.8 GWh and 102 MW in Mexico which produced 269.3 GWh
- In turn, at 31/12/13 the ACS Group had an installed power in Spain in five solar thermal plants of 249.6 MW, as well as a 10% stake in two solar thermal plants of 49.9 MW each, which produced a total of 939.9 GWh in 2013. It also had a 49.9 MW under construction in Spain and a stake in a 110 MW solar thermal plant under construction in the United States in 2013.

This represents a total of 2,681.5 GWh.

Protection against Climate Change in Leighton

As the reality of climate change continues to drive global transformation towards a more efficient economy in resource and emissions terms, many governments and regulators around the world have attempted to tackle these matters through mechanisms such as restricting emissions, adopting taxes and other mechanisms to put increasing pressure on companies in carrying out their business.

Leighton is an example, a company that carries out energy-intensive activities and operates in strict regulatory environments, such as Australia, for example, where carbon taxes were established from 1 July 2012. In this situation, Leighton recognises the need to develop and implement strategies based on clean technologies and to promote sustainability to mitigate the risks and exploit the opportunities from climate change and the regulations deriving from it.

One of the areas on which Leighton, the Australian company in which HOCHTIEF holds a majority stake, focuses is optimisation of fuel consumption and control of emissions released from mine vehicles. To this end, Leighton works closely with the Australian government on developing "Analyses of diesel use for mine haul and transport operations" with the Department of Resources, Energy and Tourism. Leighton's task consisted of evaluating the energy consumption of all the trucks operating in a mine. Actual energy use was then compared with the best theoretical truck performance and, as a result, information was obtained to promote efficiency and show the margin for improvement for a fleet of heavy vehicles.

In order to achieve a better energy balance, one of Leighton's subsidiaries, Thiess, incorporated improvements resulting from this project in its trucks with the aim of optimising loads to reduce the number of vehicles required and the number of trips made. Thiess also used hybrid excavators in the construction of the Hunter Expressway Alliance in New South Wales to find out whether there were fuel savings to be made in direct comparison between conventional high-performance excavators and the hybrids when carrying out the same work.

²⁴ This figure is made up of electricity production which obtained the guarantee of renewable origin from the Spanish National Energy Commission (CNE), totalling 702.3 GWh, and another 464.2 GWh which did not obtain the CNE's guarantee of renewable origin.

Protection against Climate Change in Leighton

The result was satisfactory, as on keeping up with the same productivity rate as the standard excavators, the hybrids used an average of eleven litres of fuel less per hour; almost 30% less than vehicles with standard engines. In total, during the project testing phase, the hybrid vehicles saved approximately 4,500 litres of fuel and the equivalent of ten tonnes of CO₂.

CO ₂ emissions by area of activity; tCO ₂ equiv.	2011	2012	2013
Construction. Total emissions	144,592	669,396	2,321,176
Construction. Scope 1	80,737	143,205	107,318
Construction. Scope 2	54,080	330,260	271,066
Construction. Scope 3	9,775	195,931	1,942,793
Construction. Total Emissions / Sales ratio (€ million)	5.1	22.6	78.5
Industrial Services. Total emissions	61,016	86,025	97,315
Industrial Services. Scope 1	43,174	43,035	70,988
Industrial Services. Scope 2	14,824	33,524	14,883
Industrial Services. Scope 3	3,018	9,466	11,444
Industrial Services. Total Emissions / Sales ratio (€ million)	8.7	12.2	13.8
Environment. Total emissions	1,702,094	1,411,329	3,426,543
Environment. Scope 1	1,618,433	136,518	172,716
Environment. Scope 2	82,834	28,547	60,913
Environment. Scope 3	826	1,246,264	3,192,914
Environment. Total Emissions / Sales ratio (€ million)	1,009.5	834.6	1,923.7

A methodology has been adopted in this report to account for CO₂ emissions in both 2012 and 2013 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.

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 95.43% of ACS's sales
- The carrying out of projects to reduce material and/or raw material consumption, which takes place already in companies representing 81.24% of ACS Group sales

In addition, there is notable implementation of policies in relation to the application of sustainable building standards²⁵. 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, through Turner in the United States and Leighton in Australia, carries out building activities in accordance with sustainable building standards.

Since the year 2000, over 500 Turner projects have been registered and certified under LEED. In addition, Turner has adopted many of the sustainable practices which are characteristic of these types of certification in the carrying out of its normal business.

Leighton Properties, Leighton's company specialised in property development, uses the GBCA – Green Building Council of Australia – Australian Green Star Methodology in carrying out its building activities.

Initiatives related to Eco-Efficiency

Savings in solar thermal plants

Cobra is replacing the oils used in solar plants with molten salts. Salts have begun to be used in solar towers and they are beginning to be introduced to parabolic trough plants. This initiative saves energy because the salts are cheaper than oils, as is their treatment as waste.

Vehicle fleet

In Barcelona, Urbaser has a fleet of electric vehicles. A pilot project has been carried out to measure the real consumption of its vehicles, efficient driving, due uses, etc. This will make it possible to compare consumptions and identify the least efficient practices and be able to apply improvement measures (training, etc.).

Energy savings

Two hundred meters have been installed in one of Urbaser's treatment plants to collect information on its energy consumptions. In this way, Urbaser has achieved significant cost savings (e.g. 6% saving in electricity consumption). This could be replicated in other facilities.

ISO 50001

Cobra and Urbaser continue to work in greater depth on ISO 50001 and on certifying their buildings and head offices.

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.

²⁵ For example, systems for sustainable building certification LEED – Leadership in Energy & Environmental Design, BREEAM – BRE Environmental Assessment Method, LCC – Life Cycle Cost Results, etc.

Wastes treated by type and area of activity	2011	2012	2013
Total ACS Group			
Non-hazardous waste sent for management (t)	1,168,706	1,274,102	3,115,697
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	31.7	33.2	81.2
Hazardous waste sent for management (t)	186,989	88,182	268,135
Ratio: Tonnes of hazardous waste / Sales (€ million)	5.1	2.3	7.0
Construction			
Non-hazardous waste sent for management (t)	1,125,254	1,110,220	3,055,017
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	40	37	103
Hazardous waste sent for management (t)	2,972	5,784	232,656
Ratio: Tonnes of hazardous waste / Sales (€ million)	0.1	0.2	7.9
Industrial Services			
Non-hazardous waste sent for management (t)	30,755	80,497	42,754
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	4	11	6
Hazardous waste sent for management (t)	240	7,198	1,265
Ratio: Tonnes of hazardous waste / Sales (€ million)	0.0	1.0	0.2
Environment			
Non-hazardous waste sent for management (t)	12,697	83,386	17,926
Ratio: Tonnes of non-hazardous waste / Sales (€ million)	8	49	10
Hazardous waste sent for management (t)	183,777	75,200	34,214
Ratio: Tonnes of hazardous waste / Sales (€ million)	109.0	44.5	19.2

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	2012	2013
Percentage of recycled aggregate	0.8%	0.8%
Percentage of certified wood	0.9%	1.3%
Total wood purchased (t)	410,428.0	493,348.6
Percentage of recycled steel	46.7%	38.4%
Total steel purchased (t)	663,781.0	1,370,317.4
Percentage of cement / concrete with recycled aggregate	0.3%	0.2%
Total cement / concrete purchased (t)	4,977,600.0	6,508,294.3
Percentage of recycled glass	0.0%	99.8%
Total glass purchased (t)	159.0	21,692.9

Energy consumption by source	2011	2012	2013
Total ACS Group			
Petrol + Diesel (million litres)	114.2	104.2	124.2
Natural gas (m ³)	1,184,488.0	2,136,012.0	343,509.0
Natural gas (kWh)	N/A	35,137,353.0	60,560,797.2
Electricity (MWh)	466,720.0	811,970.0	1,141,366.5
Construction			
Petrol + Diesel (million litres)	33.4	40.6	38.0
Natural gas (m ³)	285,276.3	273,568.6	310,951.3
Natural gas (kWh)	N/A	976,526.7	2,992,000.0
Electricity (MWh)	116,564.4	619,405.2	891,957.0
Industrial Services			
Petrol + Diesel (million litres)	16.6	16.0	26.6
Natural gas (m ³)	60,675.2	31,591.0	32,557.7
Natural gas (kWh)	N/A	768,522.5	77,910.6
Electricity (MWh)	53,152.0	98,629.8	48,973.1
Environment			
Petrol + Diesel (million litres)	64.2	47.4	59.6
Natural gas (m ³)	838,536.8	1,830,853.0	0.0
Natural gas (kWh)	N/A	33,392,304.5	57,490,886.5
Electricity (MWh)	297,004.0	93,935.1	200,436.4

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 52.96% 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
Total ACS Group			
Potable water consumption (m ³)	5,577,931.0	6,677,845.0	9,110,726.1
Non-potable water consumption (m ³)	N/A	3,389,806.4	21,279,032.7
Total waste water discharged (m ³)	4,136,225.7	4,263,678.7	8,149,663.5
Ratio: m ³ of Water / Sales (€ million)	151.3	262.2	792.0
Construction			
Potable water consumption (m ³)	2,649,086.7	3,026,719.0	3,606,787.2
Non-potable water consumption (m ³)	N/A	1,125,737.0	9,064,412.7
Total waste water discharged (m ³)	1,987,813.1	1,752,485.2	575,743.2
Ratio: m ³ of Water / Sales (€ million)	94.1	139.9	428.7
Industrial Services			
Potable water consumption (m ³)	77,301.2	458,160.0	106,313.8
Non-potable water consumption (m ³)	N/A	4,693.0	10,008,120.4
Total waste water discharged (m ³)	35,412.7	161,525.7	6,080,913.5
Ratio: m ³ of Water / Sales (€ million)	11.0	65.7	1,431.2
Environment			
Potable water consumption (m ³)	2,851,543.1	3,192,966.0	5,397,625.1
Non-potable water consumption (m ³)	N/A	2,259,376.4	2,206,499.6
Total waste water discharged (m ³)	2,112,999.9	2,349,667.8	1,493,006.9
Ratio: m ³ of Water / Sales (€ million)	1,691.3	3,224.3	4,269.1

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 2013, a large number of Group companies, representing 72.11% of sales, were carrying out 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 55.77% 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 (61.6% 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

Good Environmental Practices in Dragados

Construction is an activity commonly carried out outdoors, hence its impact on the various elements of the natural environment show themselves directly, especially as regards the soil, air, climate and biodiversity.

As Dragados is aware of this, it undertakes its activities based on principles of reducing possible impacts by adopting measures aimed, among other aspects, at conserving natural resources (water, soil, etc.) and reducing emissions and discharges, as well as their polluting loading, without overlooking the preservation of the biodiversity in the environment (flora and fauna).

Described below are some of the environmental actions or measures adopted in Dragados' works.

WATER

Water, as a strategic natural resource, is one of the most important aspects, both from the consumption point of view and of possible problems (pollution, occupation of water courses and banks, etc.).

For these reasons, Dragados' people participate actively with actions aimed at achieving reasonable water consumption and minimising discharges and polluting loadings, as well as avoiding actions in river courses and on their banks.

Reducing consumption. Sprinkler irrigation system



Access to the works takes place along a dirt road approximately 300 m long. Due to the characteristics of the works, heavy vehicle traffic (trucks and trailers) is considerable, counted at a total of 300 trips per day.

This intensity of traffic, added to the effects of the wind, caused great clouds of dust right throughout the works, which were increased by the subsequent discharges of material, affecting both the workers and the areas neighbouring the works, representing a problem that needed to be resolved urgently. To correct this action, the sprinkler irrigation system was chosen. This represented a reduction in water consumption, an increase in the effectiveness of reducing dust and particulate emissions and, additionally, a saving of nearly €30,000 in the cost of

the resources needed.

Reducing consumption. Water reuse



The water used to test the watertightness of roofs was reused, using pumps, to fill the concrete pipe and carry out the watertightness test on this pipe.

When the latter test was completed, the water was pumped to an irrigation channel crossing the site, to be used by farmers in the area for irrigation.

Good Environmental Practices in Dragados

Protection of marine waters. Placement of an anti-pollution barrier



Owing to the works to construct the quay and as a result of the dumping of fill materials from loan sites to build it, it was seen that this material sometimes contained pieces of wood and plastic which floated and drifted towards the dock, with the subsequent soiling and possible impacts of these objects on small boats.

Placing the anti-pollution barrier prevented the spread of solid wastes to the dock, allowing them to be collected subsequently and transported to a dump, as well as containing a possible fuel or oil spill from the machinery working on the dumping of fill materials.

Protection of continental waters. Silt containment systems



The woods on the banks of the river Ulla have been proposed as a SCI; the "Ulla-Deza river system". The river Ulla has significant fish populations, outstanding among which are the Atlantic salmon and the lamprey. Water is also extracted at various points for different settlements. Various silt containment systems were executed because of this.

Initially, a barrier was made from straw bales lined with geotextiles secured to the ground by round steel posts.

Subsequently, with the aim of reinforcing the protection, a ditch was made and a ridge of soil approximately 50 cm high was laid between this and the barrier, both lined with geotextile.

In this way, if any material spillage occurred, it would be retained initially and then filtered through the geotextile and the straw bales, being released to the water without turbidity.

ECO-EFFICIENCY

Based on the concept of producing goods and services using fewer resources and generating less waste.

The wastes which will be generated are identified in the planning phase with the aim of adopting measures to minimise their generation. The most appropriate management methods are defined, with reuse and recycling taking precedence over elimination.

Waste reuse



Due to the existence of surplus soil from the excavation on site and as this was mainly stone, it was decided to reuse these materials instead of transporting them to a dump.

A mobile crusher was used to produce graded aggregate. This was then used to prepare the work roads and traffic areas and it was used as gravel in drainage works.

Good Environmental Practices in Dragados

Replacement of concrete structure by an ecological wall



The measure adopted was to replace a reinforced concrete structure, designed to produce the patios for houses, with an ecological wall, based on a system of reinforced, compacted earth.

The decision was taken when it was found, in the geotechnical study of the plot, that natural materials were present that could be used (slate) to build the wall, the main characteristic of which is its compacting capacity.

This measure made use of the excavated earth, avoiding the generation of wastes, and eliminated the reinforced concrete consumption, so reducing the visual impact in turn with the presence of vegetation.

BIODIVERSITY

One of the objectives is the conservation of biological diversity in Dragados' work settings. All the means needed are adopted for this, coordinating with the competent organisations to comply with the applicable requirements. The implementation of these measures, as well as control and monitoring of them, form a part of the usual activities in carrying out the projects.

Protection of fauna. Ornithological study



Preparation of a study of the impacts on bird nesting in the area, especially Bonelli's eagle and other birds of prey, as well as the presence of the European otter, classified as near threatened. On the other hand, according to information provided by the Biodiversity Department of the Regional Government Ministry of the Environment, European dipper populations are known to exist, although the DIA does not mention it at any time.

The study accompanied a monitoring plan for the aforementioned species, based on the real impacts on presence and reproduction, enabling the works to be carried out.

The objective of both the proposed preventive and corrective measures and the monitoring plan was to guarantee proper reproduction of the threatened species, as well as to avoid disturbances resulting from the execution of the works or reduce them to the minimum.

Good Environmental Practices in Dragados



Protection of fauna. Campaign to locate and move affected species

Specifically, the presence is known of specimens of Spanish terrapin (*Mauremys leprosa*), hence an inspection and location campaign was carried out to find specimens and move them to other unaffected areas.

Protection of flora. Transplanting of tree species



On the route of the tunnel taking the Santa Cruz de Tenerife Coast Road underground, where it passes through Plaza de España, there were some Indian laurel trees of special landscaping and ecological importance.

The initial proposal was to divide the tunnel in two in this area, but, due to the additional cost this represented and the dangerous nature of the route that would remain, the decision was taken to move these trees by 25 m and not to divide the tunnel.

The weight of the transplanted trees varied between 100 and 135 tonnes (including rootball) and a 400 tonne crawler crane was used to lift and move them.

The weight of the transplanted trees varied between

CLIMATE CHANGE

Human activities generally have a great influence on climate change. Construction, in particular, as its work is carried out in open spaces and with heavy use of machines and equipment, leads to the emission of CO₂ and other greenhouse gases, as well as the alteration of large areas of land, which can involve some contribution to global warming.

In line with the reduction of the aspects that can influence climate change, one our objectives, which makes up a part of Dragados' "Manual of good environmental practices", is the optimisation of energy use and consumption, as this directly promotes reductions in harmful emissions.

Good Environmental Practices in Dragados

Emission reduction. Fuel additive



The machinery depots have heating boilers in their sheds. All these use fossil fuels to operate, specifically gas oil C.

In order to improve the performance of these boilers, as an environmental objective at these centres, boiler burner performance optimisation has been raised progressively tackled by means of the inclusion of additives in the fuel.

Continued use of these additives:

- Keeps the fuel tanks, filters and burners in excellent conditions of cleanliness, preventing losses in power.
- Reduces the formation of fumes and soot.
- Gives estimated fuel savings of 4.4%, according to manufacturers' field data.

Based on consumption data recorded over the last three years and considering the savings indicated by the manufacturers, the reduction in CO₂ emissions resulting for the use of the additives can be estimated at 18 tonnes.

5. Employees

5.1. The ACS Group's People

5.1.1. Strategic Priorities

The ACS Group's²⁶ 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 157,689 people, of whom 43,853 work in Spain and 113,836 abroad. Of all the employees, 41,255 people are of a different nationality to that of their company's head office. The ACS Group has employees in more than 65 countries, in which it promotes its workers' economic and social development.

Number of Employees by area of Activity	2012	2013	Var.
Construction	94,392	87,457	-7.3%
Industrial Services	39,140	41,635	6.4%
Environment	28,886	28,545	-1.2%
Corporate Unit	53	52	-1.9%

²⁶ 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 December 2013.

Personnel by professional category and area of Activity	Construction	Industrial Services	Environment	Corporate Unit	TOTAL
University graduates	25,666	3,551	704	32	29,953
Junior college graduates	4,005	3,112	486	4	7,607
Non-graduate line personnel	7,759	5,797	479	0	14,035
Administrative staff	5,191	2,589	595	12	8,387
Other staff	44,836	26,586	26,281	4	97,707

Types of Contract	2011	2012	2013
Permanent Contracts	95,325	100,132	94,057
Temporary Contracts	66,937	62,339	63,632

Personnel by professional category and gender	Women	Men
University graduates	6,294	23,659
Junior college graduates	1,608	5,999
Non-graduate line personnel	1,736	12,299
Administrative staff	5,502	2,885
Other staff	8,246	89,460
Total	23,387	134,302
<i>Proportion of ACS Group total</i>	<i>14.8%</i>	<i>85.2%</i>

Personnel by Geographic Area	% of total
Europe	35.9%
Americas	24.9%
Asia	17.3%
Africa	3.6%
Oceania	18.2%

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 49.30% 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 81.03% 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 result of these programmes is that no incidents occurred due to discrimination. A total of 1,033 women were reported in management posts in the company in 2013.

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, 1,190 disabled people were working in the ACS Group at 31 December 2013.

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 808 in 2013.

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, 24.4% are members of trade unions or union organisations.

Furthermore, only in companies representing 11.47% of ACS Group employees were activities detected in countries where rights of association and union representation are threatened, 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
Total staff turnover	15.1%	21.0%
Male staff turnover	15.7%	21.6%
Female staff turnover	14.8%	18.1%
Percentage days lost through absenteeism	4.1%	2.1%

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

Companies representing 90.3% of ACS Group employees offer their 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 94.05% 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

5.1.2.2. Development of Human Resources:

Employee competences, assessment, development, remuneration and satisfaction

Development of Human Resources (% of total employees)	2012	2013
Employees covered by a formal professional development system	84.7%	85.5%
Employees in posts defined according to a formal competency map	14.5%	36.9%
Employees subject to performance assessment processes	36.3%	51.6%
Employees covered by variable remuneration systems	90.4%	94.0%
Of these, the percentage of variable remuneration systems that include aspects related to Corporate Responsibility	47.4%	64.9%
Level of coverage of working environment surveys (% of total employees)	50.5%	54.2%
Employees satisfied or very satisfied	78.8%	82.7%

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 360° 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.

Companies representing 54% of Group workers stated that they have formal processes for measuring employee satisfaction. Of these, those which had carried out satisfaction surveys in 2013 reported that, on average, 82.67% 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.

5.1.2.3. Training Plans²⁷

Training	2011	2012	2013
Total teaching hours given	943,890	2,273,361	2,389,976
Teaching hours per employee (over total employees)	5.8	14.0	15.2
Employees participating in training activities	55,613	114,822	110,102
Teaching hours per employee (over employees trained during the year)	17.0	19.8	21.7
Investment in training (€ million)	18.6	87.2	85.7
Investment in training per employee (over total employees) (€)	114.7	536.6	543.4
Investment in training per employee (over employees trained during the year) (€)	334.7	759	778

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 93.66% 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

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
Scope of training plans in this regard (% of employees)	20.8%	82.8%
Number of courses given with Human Rights, Ethics, Integrity or Conduct content	1,959	629
Number of employees trained in Human Rights, Ethics, Integrity or Conduct content during the year	6,928	77,350

²⁷ The contribution from Leighton is included in the information for 2012 and 2013. This was not included in the 2012 report.

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%	51.7%
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The increase in the percentage of employees who have received Ethics courses during their career is due in large part to the increase in the scope of the data, which went from 29% of employees in 2012 to 98% in 2013.

5.1.3. Main Indicators

Main Management Indicators - People	2012	2013	Objective for 2015
Percentage days lost through absenteeism	4.1%	2.1%	< 2013
Employees covered by a formal professional development system	84.7%	85.5%	> 2013
Employees in posts defined according to a formal competency map	14.5%	36.9%	> 2013
Employees subject to performance assessment processes	36.3%	51.6%	> 2013
Employees covered by variable remuneration systems	90.4%	94.0%	> 2013
Investment in training per employee (over total employees) (€)	536.6	543.4	> 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%	51.7%	> 2013

The increase in the percentage of employees who have received Ethics courses during their career is due in large part to the increase in the scope of the data, which went from 29% of employees in 2012 to 98% in 2013.

5.2. Safety in the Workplace in the ACS Group

5.2.1. Strategic Priorities

The prevention of occupational risks²⁸ 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 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:

- Implementation of systems for management of health and safety risk prevention, developed according to the OHSAS 18001 reference standard. This policy was reported by companies representing 70.75% of Group employees

²⁸ 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 December 2013. The concepts of occupational risk prevention and safety at work are used indistinctly.

- The existence of systems audited internally and/or externally, in addition to the audits regulated by law (90.67% of Group employees)
- Definition of objectives and planning of preventive actions in the framework of the policy and particular nature of each company, an aspect which affects 97.63% of the Group's employees
- A worldwide system affecting 70.25% 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 70.75% of ACS Group employees
- Risk prevention plans are defined which take in the improvements detected in these assessment procedures (97.63% of Group employees)
- Systems which could have resulted in an incident are identified and recorded (analysis of near misses) in companies representing 97.56% of ACS's employees
- Workers' and managers' remuneration are referenced to fulfilment of formal targets as regards health and safety in 89.68% 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 2013, there 2,378 people were identified in this category.

5.2.2.2. Investment²⁹

Spending on Health and Safety	2011	2012	2013
Spending (€ million)	26.6	220.1	168.1
Spending per employee (€)	163.7	1,354.8	1,066.1

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.

²⁹ Information for Leighton is included for 2012 and 2013, which was not available in the 2012 report.

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
Employees who have received training in Health and Safety matters during the year (%)	58.9%	76.4%
Employees who have received training on Health and Safety matters during their career with the company (%)	71.2%	89.5%

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 Accident³⁰ Rate Indices

Accident rate indices Employees	2011	2012	2013
Frequency	24.43	27.84	15.14
Construction	10.09	10.70	3.67
Industrial Services	21.27	16.83	12.25
Environment	67.93	64.89	56.79
Severity	0.75	0.73	0.44
Construction	0.33	0.27	0.12
Industrial Services	0.51	0.54	1.70
Environment	2.30	1.63	0.31
Incident rate	22.63	30.20	28.11
Construction	9.31	8.47	6.89
Industrial Services	25.32	22.39	100.26
Environment	87.37	109.29	22.89

In the Frequency Rate, the scope of the employees covered for 2012 is 52% and for 2013 is 99%. This is due to Leighton not reporting its information for 2012, but doing so for 2013.

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
Frequency	8.66	6.43	8.33
Construction	8.66	4.77	6.69
Industrial Services	5.90	6.03	3.91
Environment	N/A	81.81	143.11
Severity	0.07	0.13	0.17
Construction	0.07	0.08	0.13
Industrial Services	0.09	0.09	0.07
Environment	N/A	2.52	3.53

³⁰ 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	Objective for 2015
Percentage of total employees covered by OSHAS 18001 certification	88.9%	70.8%	> 2013
Frequency Rate	27.84	15.14	< 2013
Total number of Accidents with employee time off	4,723	4,326	< 2013
Spending per employee on Safety (€)	1,354.82	1,066.11	> 2013
Employees who have received training on Health and Safety matters during their career with the company (%)	71.2%	89.5%	> 2013

In the Frequency Rate, the scope of the employees covered for 2012 is 52% and for 2013 is 99%. This is due to Leighton not reporting its information for 2012, but doing so for 2013.

5.3. Social Action in the ACS Group

The ACS Group channels its social action through the ACS Foundation, the formal social action policy of which is stated in its foundation charters and which is guided by several principles for action:

- 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 2013, the ACS Foundation spent €3.985 million, equivalent to 94.9% of its budget. A budget of €4.244 million has been approved for 2014.

5.3.1. Impact and Monitoring of Social Actions

Before each philanthropic project is carried out, the ACS Foundation identifies the social impact it may have. For example, before carrying out the accessibility project for the El Escorial Monastery in 2010 and as a preliminary measure to gauge its benefit to society, the number of complaints recorded due to problems with accessibility to the monument was analysed, as well as the number of visits annually people with disabilities have been able to make on guided visits after the ACS Foundation's action, and their level of satisfaction.

Once the projects have been completed, the ACS Foundation carries out monitoring of the social benefit generated and continuance of investment actions is defined for the most successful initiatives. This procedure will be replicated once the project on the Yuste Monastery has been completed³¹

San Jerónimo de Yuste Monastery

In 2009, National Heritage began a fruitful collaboration with the Royal Board on Disability and the ACS Foundation aimed at eliminating physical barriers in order to give access to the Royal Monasteries to people with reduced mobility.. The first action was the adaptation of the San Lorenzo de El Escorial Royal Monastery, followed in 2011 by the Santa Clara de Tordesillas and Huelgas de Burgos Royal Monasteries. An addendum to the latter agreement was signed on 1 June 2012 for this collaboration to be continued with the San Jerónimo de Yuste. This is an emblematic place in the history of Spain and, like the others, has been witness to some of the country's most momentous times.

Founded on 25 June 1409, the San Jerónimo Monastery was declared a historic/artistic monument on 3 June 1931 due to its artistic value and its special historical relevance as the place of retirement of Emperor Carlos V, also being where his remains first rested. Given its importance among the places and monuments linked to the history of the Spanish Crown, it was integrated into National Heritage by Royal Decree in 2004. Its appropriation meant that it took on the functions of the assets of this State-owned Public Organisations, the main aims of which as support to the Head of State and making the historical/artistic heritage it manages available to the public. Facilitating and constantly improving access to and enjoyment of this heritage by all citizens, under conditions of equality, is an objective of National Heritage it can never renounce and this has now been achieved in the San Jerónimo Monastery, thanks to the collaboration of the ACS Foundation and the Royal Board on Disability.

The adaptation of these monuments has not been easy, due to the complexity of their structures and their different stages of construction, added to which on occasions there were difficulties due to the relief of the land on which they stand. They all also enjoy the highest level of protection as cultural assets, so any intervention to them needs to be highly respectful.

One task undertaken was an individualised study of the spaces, always seeking respect for and integration into the setting. For this reason, the actions carried out in Yuste to provide a better service to all citizens is characterised by its reversibility, as well as by the combination of up to date technology and the use of traditional materials and techniques to facilitate a symbiosis with the historic building.

Outstanding among the actions are:

- The southern façade entrance, including car parking, access ramps and flagstone pavements.
- Granite ramps on the tree-lined Paseo Arbolado, flanked by traditional masonry dwarf and garden walls, including new glass doors, as well as visitor service desk conditioned for people with reduced mobility.
- The entrance hall and monastery cloister entries, where ramps have been installed to span the traditional steps, with glass railings to avoid impact in the setting.
- Glass doors and windbreaks have been installed in all those doors where the installation of ramps would have made it impossible to close the original main doors.
- Installation and adaptation of the toilets in the monument for people with reduced mobility, carried out in accordance with the specific regulations.
- Zigzag ramps to provide access and visits to the gardens, as well as the adaptation of the floor in some areas.
- New entrances to the church and the presbytery have been incorporated using ramps.
- All the entrances to the palace and the exhibition rooms

The whole monument is accessible for a full visit after the completion of the actions.

³¹ An investment of €484,576 has been to improve the specified monuments: €155,513 in the case of the 2010 El Escorial Monastery project, €82,158 in 2011 on Las Huelgas and €90,026 on Tordesillas and €156,877 on the Yuste Monastery in 2012 and 2013.

5.3.2. Foundation Programmes

Category	Amount allocated (€ million)
Elimination of barriers (disability)	0.793
Environment	0.105
Research	0.502
Promotion of cultural activities	0.923
Aid to other foundations and institutions	1.257
Others ³²	0.405
TOTAL	3.985

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, 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.
 - Additionally, this 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

³² Personnel and other costs for actions, such as training, payment of teachers, publishing of materials, etc.

“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 the 202 member countries of this worldwide organisation.

- 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:
- The Spanish National Congress on the Environment (CONAMA), in its various editions.
 - Support to training activities with Universities related to the treatment of municipal solid waste, the water cycle, energy, etc.
 - Environmental education programme for the Community of Madrid, oriented to include environmental education in the scheduling of the region’s educational centres, prior to university entrance level. Eight hundred activities are planned to be carried out in the February-May 2014, relating to water, renewable energies, ecosystems, responsible consumption, wastes, protected natural spaces, biodiversity and 20,000 students will benefit from them.
 - 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 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.
 - Sponsorship of the Annual Assembly of the Association of European Cathedrals Architects and Master Masons.
 - 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 of earthquakes, hurricanes, typhoons and other natural disasters that affect certain populations, such as the typhoon in the Philippines.

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 2013 and 2014.
- The ACS Group is a signatory to the United Nations Global Compact.
- ACS is a world leader in the development of infrastructure concessions, according to *Public Works Financing* magazine.
- ACS is the fourth largest company in the world by sales figures, according to the *ENR* magazine ranking published in August 2013. It is the top 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 2013.
- 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 2013 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 2013 and, generally, the two previous years.

This report was prepared following the guidelines of the G3 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 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 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 2013, 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 2013 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 2013 in the economic, social and environmental fields.

Reliability

The reliability of the information included in this 2013 Corporate Responsibility Report was checked by KPMG, the firm responsible for its verification.

8. Scope of the Data

ITEM	2013
Adherence to the Code of Conduct	98.87%
Has your company undertaken initiatives to expand the Code of Conduct?	97.82%
Is there a training plan in matters of Human Rights, Ethics, Integrity or Conduct?	98.17%
Number of courses given with Human Rights, Ethics, Integrity or Conduct content	98.17%
Number of employees trained in Human Rights, Ethics, Integrity or Conduct content	98.17%
Percentage of total current company employees who have received at least one course in Human Rights, Ethics, Integrity or Conduct during their career with the company	98.17%
Formal, documented commitment to the Universal Declaration of Human Rights	97.82%
Performance assessments in your company and the Code of Conduct	90.38%
Zero tolerance	98.55%
Code of Conduct audits	97.82%
Are activities carried out in your company in countries which pose a potential risk of child labour or forced labour?	98.87%
Have specific protocols or policies been defined o reduce such a risk?	39.44%
Is the right to association and union representation threatened in any of the countries where your company operates?	98.14%
Have you undertaken initiatives to ensure this right autonomously in the projects your company carries out there?	40.13%
Does your company have formal programmes to ensure equality of opportunities among workers?	98.87%
Have specific actions been carried out to improve on the equality programmes obligatory under the law in the countries where these apply?	98.55%
Number of incidents which occurred last year in your company due to discrimination	52.66%

ITEM	2013
Client management system	76.04%
Computerised CRM system	76.04%
Percentage of tenders made last year which included an environmental impact analysis	98.87%
Percentage of tenders made last year that required detailed information or a section related to CSR	98.87%
Level of detail and/or implementation and/or coverage of the company's Code of Conduct/Ethical Policy in bidding processes	75.73%
Restriction, in any countries in the world, due to anti-monopoly regulations	65.05%
System for measuring client satisfaction	76.04%
Plans for improving client satisfaction in your company	76.04%
Number of client satisfaction surveys carried out	75.73%
Number of client satisfaction surveys received	75.73%
Percentage of client responses of "satisfied" or "very satisfied" over the total number of surveys RECEIVED (%)	98.87%
Percentage of income represented by the clients who responded to the satisfaction survey	98.87%
Channels in your company for clients to be able to formalise their complaints and claims	75.73%
Number of complaints received from clients	18.52%
Number of complaints dealt with	18.14%
Number of complaints resolved satisfactorily	18.14%
Dealing with client comments/suggestions	75.73%

ITEM	2013
Percentage of sales from activities certified under the ISO 9001 standard	96.73%
Investments and costs for the Quality Department or allocated to improvements in quality management processes	50.52%
Number of quality audits carried out	58.28%
Quality management system	76.04%
Formal quality objectives	96.73%
Specific initiatives for improving the quality of the services provided	96.73%
Periodic inspections to check compliance with quality standards in the company's projects	96.73%
Periodic inspections to verify compliance with quality standards by suppliers and subcontractors	96.73%

ITEM	2013
Analysis of your suppliers	95.99%
Percentage of your suppliers (over the total number of suppliers) which are covered by this analysis	98.87%
Key suppliers in the analysis	98.87%
Critical suppliers	95.99%
Critical suppliers. % over procurement	98.87%
Percentage of total suppliers who represent a high risk in economic matters	98.87%
Percentage of total suppliers who represent a high risk in social matters	98.87%
Percentage of total suppliers who represent a high risk in environmental matters	98.87%
Compliance with the Code of Conduct in your company's supplier and subcontractor contract clauses	95.99%
Has compliance with the clauses related to the Code of Conduct by suppliers or subcontractors been verified internally or externally?	95.72%
Is adherence to international standards as regards human right and labour rights by suppliers viewed positively?	95.99%
Is adherence to standards for fulfilment of commitments in ethical, social and environmental matters by subcontractors and suppliers viewed positively?	95.99%
Has your company undertaken any initiatives related to sustainability that have resulted in cost savings?	78.79%
Is your company carrying out a carbon footprint analysis on your suppliers/subcontractors?	95.99%
Do you have formal systems for supplier/subcontractor approval?	95.99%
Is subcontractor/supplier certification in quality aspects (ISO 9001) viewed positively?	95.99%
Is subcontractor/supplier certification in environmental aspects (ISO 14001, EMAS or similar) viewed positively?	95.99%
Are supplier and subcontractor labour standards and practices assessed.	95.99%
Are environmental, social or governance clauses included in contracts so that these are adopted by the subcontractors or suppliers?	95.99%
Percentage of costs in procurement that are covered by these clauses	98.87%
Are internal audits (by the company itself) carried out on suppliers?	95.99%
Percentage of suppliers audited over the total number of suppliers	98.87%
Are external audits (by an independent third party) carried out on suppliers?	88.23%
Percentage of suppliers audited over the total number of suppliers	98.87%
Corrective plans for suppliers to improve their performance in economic, social or environmental	92.12%

ITEM	2013
matters	
Percentage of suppliers affected by these plans over the total number of suppliers	98.87%
Percentage of suppliers with corrective plans which have improved their performance since the plan was presented to them	98.87%
Cancellation of contracts due to breaches	95.99%
Initiatives to boost supplier capabilities	95.99%
Promotion of the use of certified / recycled materials	85.00%
Recycled aggregates	13.86%
Certified wood	98.87%
Wood	53.30%
Recycled steel	74.34%
Steel	81.75%
Recycled cement / concrete	15.21%
Cement / concrete	74.87%
Recycled glass	15.21%
Glass	15.21%

ITEM	2013
Investment in R&D+i	57.44%
Management or a specific R&D+i department	96.35%
Formal R&D+i management system	96.35%
Audits	96.35%
Number of R&D+i projects in progress at 31 December	75.66%
Number of patents registered in the year	67.37%

ITEM	2013
Percentage of your sales covered by ISO 14001 Certification	98.87%
Percentage of your sales not covered by ISO 14001 Certification, but covered by another environmental certification	87.88%
SA8000 Certification in Corporate Responsibility	98.87%
Has your company undertaken any environmental initiatives, in the last year, that have resulted in cost savings?	98.87%
Has your company undertaken any environmental initiatives, in the last year, that have resulted in an increase in income?	98.87%
Potable water consumption (m ³)	75.16%
Non-potable water consumption (m ³)	73.82%
Total waste water discharged (m ³)	28.07%
Hazardous waste sent for management (t)	75.16%
Non-hazardous waste sent for management (t)	95.57%

ITEM	2013
Petrol consumed (million litres)	74.50%
Diesel consumed (million litres)	74.78%
Natural gas consumption (m3)	28.95%
Natural gas consumption (kWh)	69.27%
Electricity consumption (MWh)	95.38%
Direct emissions of greenhouse gases not associated with the use of fuels (Scope 1 process emissions) (t CO ₂ eq)	23.77%
Business Travel Air: total km travelled on short-haul flights (< 500 km)	76.04%
Business Travel Air: total km travelled on medium-haul flights (500 km < X < 1,600 km)	76.04%
Business Travel Air: total km travelled on long-haul flights (> 1,600 km)	76.04%
Business Travel Total km travelled in private vehicles for business purposes	36.72%
Business Travel Total km travelled by train	29.83%
Business Travel Total km travelled by boat	29.59%
Others (t CO ₂ eq)	71.51%
Environmental Management System	98.87%
Auditing	98.87%
Number of environmental audits carried out in your company	76.04%
Number of environmental incidents which occurred	97.98%
Remuneration of workers, middle management and/or executives linked to the achievement of formal environmental objectives	78.18%
Non-economic incentive/recognition for the achievement of formal environmental objectives	78.18%
Specific objectives for reduction of CO ₂ emissions in your company	97.98%
Initiatives in the year to reduce your company's CO ₂ emissions	98.87%
Quantity of CO ₂ emissions prevented in the year due to the indicated initiatives	52.56%
Does your company offer products or services that make it possible for your clients to reduce GHG emissions (energy management services, sustainable construction, renewable energies, etc.)?	98.87%
What percentage of income do these products and services represent, over total income reported?	70.18%
Have projects been implemented to reduce waste generation?	98.87%
Have projects been implemented to reduce consumption of materials and/or raw materials?	98.87%
Have plans been established to reduce water consumption in your company's activities?	98.87%
Have objectives been set to minimise the impact of the company's activities on biodiversity?	98.87%
Are there projects in your company located in areas of high biological value, or in their vicinity?	78.18%
Has your company implemented a centralised database to collect data on environmental matters?	98.87%
Does your company have a system for collecting data on environmental near misses?	78.18%
Building environmental certification	54.35%

ITEM	2013
Of the number of employees, number of men	98.87%
Of the number of employees, number of women	98.87%
Of the employees reported, number of employees with a disability of over 33%	39.74%
Of the employees reported, number of women with a management position (works/project manager or similar and superior)	98.87%
Of the employees reported, number of employees of nationality different to that of your company's head office (Spain)	60.42%
Of the employees reported, number of Senior Executives from the local community (who are not Spanish)	98.55%
Of the employees reported, number of employees affiliated to a trade union organisation	98.87%
Of the employees reported, number of employees discharged last year	89.39%
Of the employees reported, number of employees retired last year	98.87%
Of the employees reported, number of employees who died last year	60.10%
Of the number of employees, number of employees contracted	98.87%
Of the employees reported, total staff turnover	97.17%
Of the employees reported, male staff turnover	97.17%
Of the employees reported, female staff turnover	97.17%
Of the employees reported, number of employees whose posts are defined according to a formal competence map	97.99%
Of the employees reported, training given: Total number of teaching hours	98.87%
Of the employees reported, total number of participants in training activities in the year	78.18%
Of the employees reported, investment in training (€ million)	98.87%
Of the employees reported, number of employees subject to performance assessment processes	98.87%
Employee satisfaction results	98.87%
Of the employees reported, total number of days lost (due to absenteeism)	39.74%
Of the employees reported, total number of days worked	98.87%
Has your company undertaken any initiatives in its area of activity, in the last year, that have resulted in cost savings?	95.84%
Has your company undertaken any initiatives in its area of activity, in the last year, that have resulted in an increase in income?	84.85%
Does the company offer employees any formal system of professional development?	97.82%
Does the company offer employees any formal system of competence management?	97.82%
Tools to manage the development of your human resources	98.87%
Variable remuneration systems	98.87%
Objectives regarding sustainability in variable remuneration	97.82%
Reconciliation of family life and employment	98.87%
Knowledge management and sharing	98.87%

ITEM	2013
Percentage of total employees covered by OSHAS 18001 certification	98.87%
Is the Occupational Health and Safety policy common to your company worldwide?	78.18%
Has your Health and Safety management system been audited by an external independent third party (excluding Statutory Auditing)	98.87%
Does your company have formal objectives as regards health and safety?	98.87%
Is the remuneration of workers, middle management and/or executives linked to the achievement of formal health and safety objectives?	98.87%
Are near misses identified and recorded?	98.87%
Investment in health and safety in the workplace (€ million)	98.87%
Total number of hours worked by your company's reported employees	98.87%
Total number of hours worked by contractors	86.91%
Total number of accidents suffered by the company's reported employees	98.87%
Total number of accidents suffered (by contractors)	94.68%
Total number of working days lost by your own reported employees	98.87%
Total number of working days lost (by contractors)	94.68%
Total number of accidents with reported employee time off	98.87%
Total number of accidents with time off (contractors)	86.91%
Total number of cases of occupational diseases (own reported employees)	98.87%
Total number of cases of occupational diseases (contractors)	94.15%
Number of people who died due to workplace accidents (own reported employees)	98.87%
Number of people who died due to workplace accidents (subcontractors)	97.50%
Number of hours of training in occupational health and safety received by your company's employees during the year	98.44%
Has your department undertaken any initiatives, in the last year, that have resulted in cost savings for your company?	85.64%
Has your department undertaken any initiatives, in the last year, that have resulted in an increase in income for your company?	85.64%
Percentage of total employees who received an occupational health and safety course in the last year	98.87%
Percentage of total employees who received an occupational health and safety course at least once in their career with the company	98.87%
Total number of employees with occupations with risks of contracting specific diseases	98.41%

9. Verification Report

See KPMG annex Document:

10. GRI Index



Declaración de Control del Nivel de Aplicación de GRI

Por la presente GRI declara que **Grupo ACS** ha presentado su memoria “Informe de Responsabilidad Social Corporativa 2013” a los Servicios de GRI quienes han concluido que la memoria cumple con los requisitos del Nivel de Aplicación A+.

Los Niveles de Aplicación de GRI expresan la medida en que se ha empleado el contenido de la Guía G3.1 en la elaboración de la memoria de sostenibilidad presentada. El Control confirma que la memoria ha presentado el conjunto y el número de contenidos que se exigen para dicho Nivel de Aplicación y que en el Índice de Contenidos de GRI figura una representación válida de los contenidos exigidos, de conformidad con lo que describe la Guía G3.1 de GRI. Para conocer más sobre la metodología: www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf

Los Niveles de Aplicación no manifiestan opinión alguna sobre el desempeño de sostenibilidad de la organización que ha realizado la memoria ni sobre la calidad de su información.

Amsterdam, 19 de marzo 2014



Ásthildur Hjaltadóttir
Director de Servicios
Global Reporting Initiative



Se ha añadido el signo “+” al Nivel de Aplicación porque Grupo ACS ha solicitado la verificación externa de (parte de) su memoria. GRI acepta el buen juicio de la organización que ha elaborado la memoria en la elección de la entidad verificadora y en la decisión acerca del alcance de la verificación.

Global Reporting Initiative (GRI) es una organización que trabaja en red, y que ha promovido el desarrollo del marco para la elaboración de memorias de sostenibilidad más utilizado en el mundo y sigue mejorándola y promoviendo su aplicación a escala mundial. La Guía de GRI estableció los principios e indicadores que pueden emplear las organizaciones para medir y dar razón de su desempeño económico, medioambiental y social. www.globalreporting.org

Descargo de responsabilidad: En los casos en los que la memoria de sostenibilidad en cuestión contenga enlaces externos, incluidos los que remiten a material audiovisual, el presente certificado sólo es aplicable al material presentado a GRI en el momento del Control, en fecha 12 de marzo 2014. GRI excluye explícitamente la aplicación de este certificado a cualquier cambio introducido posteriormente en dicho material.

GRI INDEX			
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	Capítulo 1. Carta del Presidente
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	Capítulo 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	Año 2012
3.3	Reporting cycle (annual, biennial, etc.)	Fully	Anual
3.4	Contact point for questions regarding the report or its contents.	Fully	infogrupoacs@grupoacs.com
3.5	Process for defining report content.	Fully	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	Capítulos 7 y 8
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
3.1	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	No hay cambios
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	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	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	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	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,	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	Fully	3.1.1 Capítulo 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	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	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	2.2.1.1; 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	4.4.1; 4.4.2.4
	Product and service labelling	Not	
	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	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	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	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.	Not	
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	Fully	4.5.4.4
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high	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	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	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	Fully	4.5.4.1
EN18	Initiatives to reduce greenhouse gas emissions and reductions	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	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	Fully	4.5.2; 4.5.4
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	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.	Fully	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	5.1.2.1
LA15	Return to work and retention rates after parental leave, by gender.	Not	
Labor/management relations			
LA4	Percentage of employees covered by collective bargaining	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.	Fully	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	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	Fully	5.2.2.3
Training and education			
LA10	Average hours of training per year per employee by gender, and by	Fully	5.1.2.3
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in	Not	
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	Fully	5.1.2.2
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	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	5.1.2.3
Non-discrimination			
HR4	Total number of incidents of discrimination and corrective actions	Fully	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	Fully	5.1.1
Child labor			
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to	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	Fully	4.3.4
Security practices			
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are	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
SO9	Operations with significant potential or actual negative and positive impacts on local communities.	Fully	5.3.1
SO10	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local	Fully	5.3.1
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	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	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.	Fully	4.4.1
Product and service labelling			
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such	Fully	4.4.1
CRE8	Type and number of sustainability certification, rating and labeling schemes for new construction, management, occupation and	Fully	4.2.3
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and	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.	Not	
Compliance			
PR9	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:

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