



## DIVERSITY POLICY

**ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A.**

**DIVERSITY POLICY**

Reference	5_Política de Diversidad_2_2019
Title of <i>Standard</i>	Diversity Policy
Scope	Global
Category	Policy
Executive	Appointments Committee
Approval date	February 27, 2019
Version	Version 2

**Approval of the document by the Board of Directors**

The Board of Directors of ACS approved the content of this document on February 27, 2019.

## **1. Aims and Principles of the Policy**

The Board of Directors of ACS, Actividades de Construcción y Servicios S.A. (“ACS”), the parent company of its group of companies (the “ACS Group” or the “Group”), by means of this Policy, has the primary aim of setting forth, implementing and furthering the commitment of ACS and the Group to diversity and inclusion of all manner of communities and sensibilities in the different spheres and at the different levels of the Group, establishing the guidelines and objectives which are to shape the Group's actions in regard to diversity.

In this sense, ACS will promote diversity in its organizations as a natural reflection of the society for whom its services are intended. In this respect, ACS will ensure that diversity enables the members of the administrative bodies, boards of directors and oversight authorities in the various companies to perform their respective duties in a way that is more innovative, more critical and more closely adapted to the genuine needs of the business.

Given that the ACS Group’s geographic spread means that it is a diverse and multicultural Group, the intention is to continue and encourage the recruitment of professionals with a broad range of profiles, including various races, ethnicities, ages, nationalities, languages, levels of education, skills, religions and gender, so that all of this is a constant in the Group's day-to-day activities.

At ACS, we will work to make the natural diversity which is characteristic of our society a significant source of value creation for the companies in our Group. In this sense, as diversity is already part of the ACS Group’s image worldwide, this Policy aims to spread and instill this invaluable asset in all areas of business and at all levels within the ACS Group, setting out the guidelines which all the companies in the Group must abide by in relation to diversity.

## **2. Scope of application**

### **2.1 Territorial**

The current Policy is applicable worldwide.

### **2.2 Subjective**

This Policy shall be mandatory for ACS, which will disseminate it and ensure it is implemented in all companies within the Group.

## **3. Normative framework (Standards of reference)**

This Policy must be interpreted in the context of the following ACS Standards, and in accordance with the stipulations of the legislation in force that applies to ACS:

- ACS Code of Conduct.
- Code of Conduct for Business Partners.
- Corporate Social Responsibility Policy.
- Human Rights Policy.

#### 4. Definitions and abbreviations

For this Policy, the following terms shall be interpreted as having the following definitions. In addition, the abbreviations used in the Policy shall have the meaning attached to them in this section.

- **ACS:** ACS, Actividades de Construcción y Servicios, S.A.
- **ACS Group or Group:** ACS Group Companies
- **Standards:** Texts used by ACS with the aim of providing Procedures to persons linked to the organization, in a context either of employment or of commercial collaboration. They are divided into Policies, Regulations and Procedures, and may be Global or Local in scope.
- **Policy:** refers to the present Diversity Policy.

#### 5. Contents of Diversity Policy

##### a. Encouraging diversity among the governing bodies of ACS and the ACS Group

In accordance with the mandate contained in the Statutes of the Board of Directors of ACS, it shall be the responsibility of the Board of Directors, in consultation with and with the support of the Appointments Committee, to ensure that the procedures for selecting its members encourage diversity, with respect to factors such as age, gender, disability, training and professional experience, and are not tainted by implicit biases which could represent any form of discrimination and, in particular, to facilitate the selection of female Board members in sufficient numbers to have balanced numbers of men and women, informing shareholders and salespeople through the appropriate channels, of the criteria and diversity objectives applied when selecting or renewing the mandates of the members of the Board of Directors and the specialized Oversight Committees formed from within its ranks.

In addition, the Board of Directors of ACS, as parent company of the Group, will promote the dissemination and application of the principles and guidelines of this Diversity Policy in the governing bodies and at the various levels of the companies within the Group, without prejudice to the regulations applicable to those companies based on the jurisdictional areas in which they operate.

In turn, the Board of Directors of ACS will apply the objectives, measures adopted and results pertaining to the application of the Diversity Policy in the ACS Group, and disseminate that policy to its employees, suppliers, clients, administrative bodies and corporate officers, and to the various interest groups.

The constant progress being made in this area, which has been ongoing for several years now, can be viewed in the Annual Integral Report and the Annual Report on Corporate Governance, published on the ACS Group's website ([www.grupoacs.com](http://www.grupoacs.com)).

##### b. Objectives and commitments in terms of diversity

At ACS, we believe that diversity should be a value, and also an objective to be constantly pursued in all areas of the Group. Therefore, beyond promoting diversity on the Board of Directors and in addition to the commitments on equal opportunities and non-discrimination contained in ACS' Human Rights Policy, which is also published on the ACS Group's website, ACS' objectives and concrete commitments in terms of diversity are as follows:

- (i) To promote the integration of people with a range of profiles (with respect to gender, sexual orientation, race, nationality, ethnic background, religion, beliefs, age, disability, etc.) in all areas of business and at all levels within the Group.
- (ii) To identify talent, in selection and promotion processes, whose incorporation or promotion will aid diversity in the ACS Group, establishing training and development programs, or other mechanisms, to ensure that talent remains, and is promoted, within the Group.
- (iii) To promote the selection of professionals with alternative skills, attaching value to the benefits derived from their joining the Group, for the professionals themselves, for the business and, ultimately, for the company as a whole.
- (iv) To encourage generational diversity within our teams, promoting close collaboration between older professionals and younger ones.
- (v) To continue furthering the integration and inclusion of vulnerable groups, which has the additional purpose of helping to reduce inequality in and between the countries in which the Group operates, helping to meet the Sustainable Development Objectives passed by the UN Assembly in its 2030 Agenda for Sustainable Development.
- (vi) To foment the implementation of systems to measure the progress being made in terms of diversity, and systems to evaluate the positive impact that this progress is having in the Group's companies.
- (vii) To communicate and disseminate the ACS Group's commitment to diversity to employees, suppliers, clients, administrative bodies, corporate officers, etc.
- (viii) To maintain neutral and inclusive language in both internal and external communications, also steering clear of stereotyped images which could infringe the value of diversity.

ACS Group Companies must adopt measures which, in light of their characteristics and the concrete circumstances, help to achieve the aforementioned goals, giving rise to a diverse and inclusive working environment.

## **6. Follow-up, assessment and revisions of the Diversity Policy**

It shall be the responsibility of the Appointments Committee of ACS to follow up and assess the application of this Diversity Policy, periodically reporting on the matter to the Board of Directors, and putting forward proposals to modify the Policy in any way it deems wise or necessary for the development and implementation of the guidelines and objectives.

## **7. Exceptions to the Policy**

There are no explicit exceptions to the application of this Policy. However, any Department which applies for an exception to the application of this Policy must request authorization, in writing, from ACS' Compliance Committee, setting out the reasons which justify the exception.

## **8. Breach of Policy**

Any breach of this Policy must be reported, *via* the various channels for that purpose available at ACS, including the corresponding line manager or, directly, through the Group's Ethics Channel for matters which constitute a violation of the Code of Conduct or the Code of Conduct for ACS Business Partners.

ACS will apply the appropriate sanctions to people or companies having been responsible for, or complicit in, the breaches, in accordance with the seriousness of the offense and within the legal structure that is applicable in the jurisdiction where the offense was committed.

#### **9. Approval, entry into force and period of validity**

This Policy is applicable from the time of its approval by the Board of Directors of ACS on the date indicated at the start of this document, and will be mandatory in its objective and subjective facets from then on.

This Policy supersedes the following policies, which will cease to be applicable from the moment this Policy enters into force:

- Diversity Policy approved on November 13, 2017.

#### **10. Additional considerations**

Although this Policy may be translated into other languages, the authentic version of the document, for the purposes of interpretation, is the original version written in Spanish.