



DIVERSITY POLICY

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| Title of the Rule | Diversity Policy |
| Geographical area | Global |
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Important information about this document

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| Document identification | Diversity Policy |
| Reference | 5_Diversity Policy_3_2020 |
| Geographical application | Global |
| Section of other Rules it implements | Code of Conduct |
| Rules it replaces | Previous version of 27 February 2019 |
| Rules it repeals | None |
| Main body responsible for oversight | <i>Board of Directors</i> |
| Proposing body or department | <i>Compliance Committee</i> |
| Author | <i>Compliance Committee</i> |
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Control of Changes

| Version | Date | Approval body | Author | Summary of changes |
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| 1 | 19 December 2017 | Board of Directors | Garrigues | |
| 2 | 27 February 2019 | Board of Directors | Compliance Committee | Adaptation to Spanish Law 11/2018 and CNMV Technical Guide 3/2017 |
| 3 | 17 December 2020 | Board of Directors | Compliance Committee | Change to the name of the term <i>Corporate Social Responsibility</i> to <i>Sustainability</i> . Adaptation to the Good Governance Code for Listed Companies as amended by the CNMV on 26 June 2020 |

Purpose 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”), through this Policy, aims mainly to express, implement and develop the commitment of ACS and its Group to the diversity and inclusion of all types of groups and sensitivities in the various areas and levels of the Group, establishing the guidelines and objectives that should govern the Group’s actions with regard to diversity.

In this regard, ACS will promote diversity in organisations as a natural reflection of the society for which its services are intended. ACS will therefore ensure that diversity enables the members of the companies’ administrative, management and supervisory bodies to carry out their respective functions in a more innovative and critical manner, in line with the actual needs of the business.

Based on the fact that the ACS Group’s geographical area makes it a diverse and multicultural Group, it will ensure and encourage the inclusion of professionals with diverse profiles, including professionals of different races, ethnicities, ages, nationalities, languages, education, abilities, religions and gender, making this a constant in the Group’s day-to-day activities.

ACS will work to ensure that this natural diversity that characterises us becomes a significant source of value creation for the companies in our Group. In this regard, although diversity already forms part of the ACS Group’s imprint on the world, this Policy aims to disseminate and embed this valuable asset in all of the ACS Group’s business areas and levels, establishing the guidelines that the Group companies must follow in relation to this matter.

Scope of application

Geographical area

This Policy applies globally.

Subjective scope

Compliance with this Policy will be mandatory for ACS, which will promote and ensure its application at all Group companies.

Framework regulations (benchmark rules)

This Policy must be interpreted in the context of the following ACS Rules, and in accordance with the current law applicable to ACS:

- ACS Code of Conduct.
- Code of Conduct for Business Partners.
- Sustainability Policy.
- Human Rights Policy.

Definitions and abbreviations

For the purposes of this Policy, the following terms will be interpreted in accordance with the definitions below. Likewise, the abbreviations used in this Policy will have the meaning assigned in this section.

- **ACS:** ACS, Actividades de Construcción y Servicios, S.A.
- **ACS Group or the Group:** ACS Group companies.
- **Rules:** Texts provided by ACS with the aim of facilitating procedures for the people who are linked to the organisation, both under an employment system and a commercial system. They are divided into policies, regulations and procedures, and may be global or local in scope.
- **Policy:** refers to this Diversity Policy.

Contents of the Diversity Policy

a. Projection of diversity on the governing bodies of ACS and its Group

In compliance with the mandate contained in the ACS Board Regulations, the Board of Directors, with the collaboration and support of the Appointments Committee, will be responsible for ensuring that the procedures for the selection of its members favour diversity with regard to matters such as age, gender, disability, or professional training and experience, and do not entail an implicit bias that could imply any discrimination and, in particular, that they facilitate the selection of a sufficient number of female directors to achieve a balanced presence of women and men, informing shareholders and markets through the

appropriate channels of the diversity criteria and objectives applied when electing or renewing the Board members and members of the specialised supervisory committees set up by the Board.

The ACS Board of Directors, in its capacity as the Group's parent company, will also promote the dissemination and application of the principles and guidelines of this Diversity Policy in the governing bodies and at the various management levels of the Group companies, without prejudice to respecting the regulations applicable to them based on the jurisdictions in which they operate.

In turn, the ACS Board of Directors will ensure the application and dissemination to employees, suppliers, customers, authorities and social agents, as well as to the various stakeholders, of the objectives, measures adopted and results relating to the application of the ACS Group's Diversity Policy.

The continuous progress that has been made in this area for several years can be consulted in the Annual Integrated Report and in the Annual Corporate Governance Report, which are published on the ACS Group's website (www.grupoacs.com).

b. Diversity objectives and commitments

At ACS, we believe that diversity should be a value and, in turn, a permanent objective in all areas of the Group. Therefore, beyond promoting diversity within the Board of Directors and in addition to the commitments in relation to equal opportunities and non-discrimination contained in ACS's Human Rights Policy, which is published on the ACS Group website mentioned above, ACS's specific objectives and commitments in relation to diversity are as follows:

- (i) Foster the integration of people with diverse profiles (gender, sexual orientation, race, nationality, ethnic origin, religion, beliefs, age, disability, etc.) in all business areas and levels of the Group.
- (ii) Attempt to identify talent, both in selection and promotion processes, the inclusion or promotion of which favours diversity in the ACS Group, establishing training and development programmes, or other mechanisms, which contribute to ensuring that they remain at and are promoted within the Group.
- (iii) Promote the selection of professionals with alternative skills, highlighting the benefits derived from their inclusion and integration for the professional, for the business and, ultimately, for the company as a whole.
- (iv) Encourage generational diversity in the teams, fostering close collaboration between older and younger professionals.

- (v) Continue to examine the integration and inclusion of vulnerable groups with the additional aim of contributing to reducing inequalities in and between the countries in which the Group operates, thus complying with the Sustainable Development Goals approved by the UN Assembly in its 2030 Agenda for Sustainable Development.
- (vi) Encourage the implementation of systems for measuring the progress made in diversity, as well as systems for assessing the positive impact of this progress on the Group companies.
- (vii) Communicate and extend the ACS Group's commitment to diversity to employees, suppliers, customers, authorities, social agents, etc.
- (viii) Maintain a neutral and inclusive language in both internal and external communications, also avoiding stereotyped images that may violate the value of diversity.

ACS Group companies should adopt those measures that, in accordance with their specific characteristics and circumstances, enable these objectives to be achieved, generating a diverse and inclusive working environment.

Monitoring, evaluation and revisions of the Diversity Policy

The ACS Appointments Committee will be responsible for monitoring and evaluating the application of this Diversity Policy, reporting on the Policy to the Board of Directors on a regular basis and proposing to the Board any changes to the Policy that it considers appropriate or necessary for the development and implementation of its guidelines and objectives.

Exceptions to the Policy

This Policy does not include any exceptions to its application. However, the Department requesting an exception to the application of this Policy must obtain written authorisation from the ACS Compliance Committee, and state the reasons justifying this exception.

Non-compliance with the Policy

Non-compliance with this Policy must be reported through the different channels available at ACS for such purposes, including the corresponding hierarchical superior or directly through the Group's Whistleblowing Channel for those cases that constitute a breach of its Code of Conduct or the ACS Code of Conduct for Business Partners.

ACS will apply the corresponding penalties to the persons or companies that have caused or collaborated in the breaches, in accordance with the

seriousness of the breaches and within the legal framework applicable in the jurisdiction in which they have been committed.

Approval, entry into force and effectiveness

This Policy is applicable after its approval by the ACS Board of Directors on the date indicated at the beginning, and its application with regard to its objective and subjective scopes is mandatory from that time.

Additional considerations

Although this Policy may be translated into different languages, the authentic version of this Policy, for interpretation purposes, will be that drafted in Spanish.