



CORPORATE SOCIAL RESPONSIBILITY POLICY

Approved by the Board of Directors on 25 February 2016

“Translation of originally issued in Spanish and prepared in accordance with the regulatory applicable to the Group. In the event of a discrepancy, the Spanish-language version prevails”

CONTENTS

1	PURPOSE	3
2	CORPORATE STRATEGY	3
3	BASIC PRINCIPLES OF CONDUCT	4
3.1	Information Transparency	5
3.2	Ethics and Integrity	5
4	SPECIFIC PRINCIPLES OF CONDUCT	6
4.1	Clients	6
4.2	Employees	6
4.3	Suppliers	8
4.4	Shareholders	8
4.5	Environment	9
4.6	Quality	10
4.7	Innovation	10
4.8	Social Action	11
5	MONITORING AND SUPERVISION SYSTEMS	11

1 PURPOSE

The Board of Directors of ACS, Actividades de Construcción y Servicios S.A, in accordance with that stated in Article 5.2.m) of the current Rules of the Board of Directors, has among the powers that it cannot delegate that of approving the Corporate Social Responsibility Policy.

By reason of this, it has approved the following Corporate Social Responsibility Policy to establish the basic and specific principles for action for ACS, Actividades de Construcción y Servicios S.A. and Group companies (hereinafter the “ACS Group” or the “Group”) in this matter, as well as in the Group’s relationship with its setting.

This Corporate Social Responsibility Policy is supported by the various specific policies and codes for action, which meet certain needs for information and/or action in the setting of the various stakeholders. Furthermore, the necessary supporting instruments will be developed to enable the Group to comply with the established principles and commitments.

2 CORPORATE STRATEGY

The ACS Group is a world leader in the infrastructure development industry and has a clear, defined mission to pursue global leadership by optimising the profitability of the resources used and by 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:

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

The corporate values the ACS Group has developed over its history form the basis for action of all Group employees and they are:

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

The ACS Group has a decentralised structure and performs its business through an extensive group of companies that share the ACS Group's culture and values at the same time as operating with their own, independent management systems. Therefore, contributions from all its companies come together in the ACS Group's Sustainability effort, implementing its policies for action autonomously and managing their resources in the most efficient manner possible, always covered by the common principles and objectives defined in this Corporate Social Responsibility Policy.

3 BASIC PRINCIPLES OF CONDUCT

The ACS Group defines stakeholders as groups with the capacity to have an influence on the achievement of the organisation's objectives. Outstanding among these are its clients, employees, suppliers and shareholders and the infrastructure users who benefit from its policies related to quality, innovation, social action and the environment.

The basic principles for action of the ACS Group in relation to its stakeholders and the environment are based on complying with the national and international laws and regulations in force in the countries where it operates, as well as fulfilling the international commitments related to corporate social responsibility voluntarily subscribed to by the ACS Group. The Group also commits to carrying out all its business following the fundamental principles of information transparency, ethics and integrity.

3.1 Information Transparency

The ACS Group has a commitment to complete rigour in the information it transmits, always respecting the interests of its clients and of the rest of the company's social interlocutors.

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 fluid relationship with the Group's various interlocutors.

The ACS Group manages its commitment to transparency to its stakeholders through the operating companies themselves, through investor communication and relation and shareholder service departments, as well as through the ACS Group website.

3.2 Ethics and Integrity

The ACS Group and the companies which make it up are 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 Group promotes knowledge of the general principles of conduct, ethics and integrity by all employees, clients, suppliers and subcontractors.

To comply with this principle, one of the fundamental tools is the ACS Group Code of Conduct*, approved by the Board of Directors. The Group Ethical Channel is available to employees to report incidents or doubts related to this Code of Conduct and its control system, called the Code of Conduct Monitoring Committee, reports to the Board of Directors.

* http://www.grupoacs.com/index.php/es/c/gobiernocorporativo_codigodeconducta

4 SPECIFIC PRINCIPLES OF CONDUCT

4.1 Clients

The ACS Group's 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
- Pursuit of the best technical and economic solution for the client
- Responsible use of information, so guaranteeing client confidentiality

Each company's contract management department is responsible for managing them, promoting the following:

- Monitoring of client needs
- Periodic measurement of client satisfaction
- Foreseeing upcoming client needs

4.2 Employees

The ACS Group's General Code of Conduct constitutes a guide for the professional performance of all the Group's employees and managers in relation to their 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 the recognition of behaviours appropriate to the ethical principles of good faith among its employees, as demonstrated in loyalty to the company and in defence of Group interests; compliance with the laws in force; honesty in management and prohibition of bribes and corruption; avoiding any kind

of behaviour and procedures constituting unfair competition; and commitment to confidentiality. Furthermore, the Group establishes its commitment to the current tax rules in each country or territory where it is present, preventing the concealment of relevant information, the illegal avoidance of tax payments or the obtaining of improper tax benefits. In this matter, the ACS Group has adhered to the Spanish Tax Agency's Code of Good Tax Practices.

- Professionalism: the ACS Group's employees and managers must be characterised by their high level of professionalism, based on efficient action and focused on excellence and quality in service. In this regard their behaviour must be based on the principle of quality and innovation of its products and services; client orientation; efficient use and protection of business assets; establishment of stable relationships based on trust and mutual benefit with collaborating companies and suppliers and the commitment to information transparency.
- Respect for People and the Environment: the ACS Group assumes the commitment of acting in accordance with the United Nations Global Compact, to which it has adhered since the beginning. In this regard, all the 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. Based on this, the relationship of the Group with its employees, as well as the relationship among employees, therefore, shall be based on the following commitments:
 - Promoting the professional and personal development of all of its employees, ensuring equal opportunities.
 - Non-discrimination on the basis of race, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political or union opinions, religion or any other personal, physical or social condition.
 - The Group companies commit to maintaining a training policy for their employees' learning and personal and professional development.

- Commitment to health and safety at work, providing its employees with a safe, stable environment, continuously updating the measures for preventing labour risks and respecting the applicable regulations in this aspect in all the places where it performs its business activities.
- Eradication of child labour.
- Eradication of forced labour.
- Respecting minority rights.

4.3 Suppliers

Each purchasing department in Group companies manages the relationship with suppliers and contractors and defines the management and control processes, detailed in accordance with operational needs, including the following points:

- The existence of specific standards and systems for management, classification, approval and risk control of suppliers and subcontractors.
- Analysis of the level of compliance of these systems.
- Promoting collaboration with suppliers and transparency in contractual relationships.

All Group employees who participate in selection processes for contractors, suppliers, and external collaborators are obliged to act impartially and objectively, applying quality and price criteria and avoiding any conflicts of their personal interests with those of the company.

4.4 Shareholders

The Group's commitment to the markets, shareholders and investors is upheld in its information transparency. In addition, shareholders' right to information is detailed in several parts of the Shareholders' General Meeting By-laws. Hence, in order for the General 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 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 responds to requests formulated by shareholders for the purpose of the General Shareholders' Meeting, provided that the Company's interests are not jeopardised.

The ACS Group uses various channels to meet this commitment to communication and transparency, whether through the Group website, the investor relationship and shareholder service department or by means of various instruments created *ad hoc*, such as the shareholders' web forum.

4.5 Environment

The ACS 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 defines the general principles to be followed and these are sufficiently flexible as to accommodate the elements of policy and planning of the companies in the various business areas and to comply with the requirements of the ISO 14001 standard. Stipulated within these principles are:

- 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

Specifically and operationally, the main environmental measures centre around four keys risks:

- The fight against climate change
- Promoting eco-efficiency
- Water saving
- Respect for biodiversity

In order to be able to articulate and deploy a policy based 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. Targets and improvement programmes are established for each of these priorities by company or group of companies. The responsibility of overseeing the ACS Group's environmental performance falls to the Environmental Department in each group of companies.

4.6 Quality

For the ACS Group, quality represents a differentiating factor in comparison with the competition in the infrastructures and services industry, thanks to the technical sophistication developed by Group companies.

Each Group company adapts its needs to the specific features of its type of production, promoting:

- Periodic target setting as regards quality and the evaluation of its achievement.
- The carrying out of initiatives and actions aimed at improving the quality of the services provided.
- The carrying out of specific actions in collaboration with suppliers and subcontractors to improve quality.

Quality Management in the Group's various groups of companies is the entity responsible for implementing their own Quality Management Systems.

4.7 Innovation

Through its commitment to technological development, the ACS Group responds to the growing demand for improvements in processes, technological advances and quality of service from its clients and from society.

The R&D&i management system serves the general research strategy of each of the companies which, whatever their specific features, promote the following lines of action:

- Development of strategic lines of research individualised by company.

- Strategic collaboration with external organisations.
- Responsible investment in order to promote research and generate patents and operational techniques constantly and efficiently.

4.8 Social Action

A commitment to improving society is part of the ACS Group's objectives. To contribute to this objective, the Group bases itself on a Policy for Social Action* linked to its business strategy, as this is the optimal medium for generating real shared value for all stakeholders.

This policy seeks to impel the ACS Group's Social Action with the following objectives:

- Driving forward the business and its sustainability Improving the Company's prestige and reputation
- Increasing employee and partner satisfaction
- Helping to improve the society in which the ACS Group operates

5 MONITORING AND SUPERVISION SYSTEMS

According to that stated in Article 25 of the Rules of the Board of Directors, the Audit Committee is responsible for supervising compliance with the rules for corporate governance, the internal codes of conduct and the corporate social responsibility policy.

Furthermore, among the functions attributed to the Audit Committee is the reviewing of the Company's corporate responsibility policy, to ensure that this is aimed at creating value. Similarly, the Audit Committee is responsible for monitoring corporate social responsibility strategy and practices, as well as evaluating the degree of compliance with them. The Audit Committee will also be responsible for supervising and evaluating the processes in the relationships with the various stakeholders and evaluating everything relating to the company's non-financial risks, including operational, technological, legal, social, environmental and political risks and risks to its reputation.

* http://www.grupoacs.com/index.php/es/c/responsabilidadcorporativ_compromisoconelentornosoc_accionsocial

To monitor and evaluate social responsibility strategy and practices, the ACS Group has developed Project One. This tool seeks to promote good management practices among Group companies, and to promote the eminently industrial nature of ACS's activities by spreading corporate culture, through periodic evaluation of the ACS Group company practices in terms of Corporate Social Responsibility.

Madrid, 25 February 2016