

ANTI-CORRUPTION DECLARATION OF COMPLIANCE BY THE BOARD OF DIRECTORS OF ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A.

The Board of Directors of ACS, Actividades de Construcción y Servicios, S.A. recognizes that corruption is an extremely damaging practice, which erodes the competence and reputation of those public and private organizations that are involved in it. This statement of compliance demonstrates our commitment to prevent corruption. Acting with integrity is a core part of our policy and we will not tolerate any form of corruption. We will implement and apply effective systems to combat corruption.

We have adopted a Criminal Compliance and Anti-Bribery Policy that establishes the processes designed to prevent any person related to us from carrying out an act of corruption.

We will apply in all aspects of our business all national and international regulations related to the fight against corruption. In accordance with Spanish regulations, acts of corruption carry a prison sentence of up to six years for individuals and legal entities, as well as fines of up to five times the benefit obtained, incalculable reputational damage. So we take our legal responsibilities very seriously. Any act of corruption committed by a member of this organization will entail the adoption of disciplinary measures and will be dealt with severely by the Board of Directors. We require all business partners associated with our organization to demonstrate, in order to do business with us, that they have a commitment similar to ours to prevent corruption.

We firmly believe that a zero tolerance for corruption supports our reputation as an entity that acts ethically and honestly. It also inspires confidence in the recipients of our services and the general public.

As part of our commitment to preventing corruption within our organization, the Board of Directors has established a series of Compliance Policies and Procedures, part of which are available on the corporate website www.grupoacs.com, the Most relevant are the Criminal Compliance and Anti-Bribery Policy and the Code of Conduct for Business Partners.

The Board of Directors counts on the implementation of the criminal compliance management system, with the assistance of the Compliance Committee, which reports to the Audit Committee of the Board of Directors, whose functions include the development, implementation, monitoring and review of internal corruption prevention processes.

Madrid, March 26, 2020.