



Policy Governing Participation and Monitoring of Sector Associations

Approved by the Board of Directors on July 27, 2023

Translation 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.

POLICY GOVERNING PARTICIPATION AND MONITORING OF SECTOR ASSOCIATIONS

CONTENTS

1. PURPOSE	4
2. SCOPE	4
3. REGULATORY FRAMEWORK	4
4. GUIDING PRINCIPLES.....	4
5. APPLICATION AND SUPERVISION	5

1. PURPOSE

ACS, Actividades de Construcción y Servicios, S.A. and its group of companies (“ACS and its Group”) actively participate in sector associations, working groups and discussion forums.

The aim of this participation is to promote the sectors in which ACS and its Group participate, and to establish dialogue initiatives to improve relationships with its stakeholders.

This Policy is established to delineate this participation and sets out the procedure to be followed by ACS and its Group in selecting and participating in these associations, so as to comply with the principles established by national and international law, and those voluntarily assumed by ACS and its Group in its internal regulations.

2. SCOPE

This Policy is globally applicable and directly affects ACS, Actividades de Construcción y Servicios, S.A. and its group of companies.

3. REGULATORY FRAMEWORK

This Policy will be governed at all times by applicable national and local law, in accordance with the principles of transparency, ethics, honesty and zero tolerance for the commission of criminal acts within ACS and its Group, especially towards corruption and money laundering. This Policy will also be subject to the following rules approved within the ACS Group:

- The Code of Conduct.
- The Code of Conduct for Business Partners.
- The Sustainability Policy.
- The Environmental Policy, which ratifies the ACS Group’s commitment to environmental protection and is in line with the resolutions and agreements on climate change, such as the Paris Agreement.
- The Criminal Compliance and Anti-Bribery Policy, an integral part of the ACS Group’s Criminal Compliance and Anti-Bribery Management System, certified in accordance with UNE 19601 and ISO 37001 standards.
- The Structural Document of the Global Compliance Management System.
- Internal and External Due Diligence Procedures.
- The General Compliance Policy.
- The International Sanctions Compliance Policy.
- The Competition Policy and Compliance Protocol.

4. GUIDING PRINCIPLES

The following principles set out the common framework for ACS and its Group for participation in sector associations, working groups, industry forums and other similar associations.

- Promote the development of the economic sectors and geographical areas in which ACS and its Group operate, strengthening economic growth, the business fabric and the generation of employment.
- Establish dialogue initiatives with the various stakeholders to achieve common objectives, especially in those matters that constitute global challenges to which the ACS Group is committed, such as the fight against climate change.
- Promote the development of initiatives related to material topics within the activities carried out by ACS and its Group, such as innovation, environmental protection, the fight against climate change, health and safety, professional development, and compliance in terms of ethics and transparency, among other topics.
- Improve the recognition and reputation of ACS and its Group in the sector.
- Ensure the ethical and transparent management of participation in these associations by monitoring and following up on them, taking into consideration compliance with the principles established in national and international law in all cases. The associations in which ACS and its Group participate must also be aligned with the principles set out in the Code of Conduct and the rest of the ACS Group's policies.

In particular, and in accordance with the ACS Group's Code of Conduct, ACS Group companies will ensure compliance regarding anti-corruption and anti-bribery matters, and also avoid any transaction that could be interpreted as a gift or donation to political parties or individual politicians, whether in cash or in kind.

They must also ensure that donations or sponsorships to entities apparently not linked to political parties or public officials do not fundamentally contravene the provisions of the Code of Conduct. When permitted in the territories where they are intended to be carried out, lobbying activities will be carried out in strict compliance with applicable regulations and following the processes established by the ACS Group companies in relation to these activities.

5. APPLICATION AND SUPERVISION

This Policy will be applied in accordance with the ACS Group's Corporate Governance Policy, which defines the structure of the Group, of which ACS is the parent, based on a highly decentralised management model in accordance with applicable regulations and best corporate governance practices.

ACS and its Group will be able to select the sector associations in which they participate, in accordance with the guiding principles of this Policy, the strategic priorities of their business, and the needs of the communities in which they operate.

Each company will be able to designate a person(s) or department(s) responsible for sector associations, and their responsibilities will include selecting and managing this participation in the different sector associations taking into account the related impact and opportunities.

ACS and its Group must keep orderly accounts of the management of the funds allocated to the associations governed by this policy and will collaborate with the Group's parent in compiling the financial and sustainability information relating to these associations when required, within the scope of the Group's internal control and audit processes, in accordance with Article 26 of

the Board Regulations, which stipulates that the ACS Group's Audit Committee will oversee compliance with the Company's environmental, social and corporate governance policies and rules, and the internal codes of conduct.

Participation in the various associations will be reviewed on a regular basis to assess the relevance of the participation to the corporate strategy. This includes reviewing, among other aspects, alignment with the strategic business priorities and business activity of ACS and its Group, and the positions of the various associations as regards the policies of and commitments acquired by the ACS Group.

If any conduct or positions are detected that contravene the principles set out in the ACS Group's Code of Conduct and in the rest of the Group's regulations, the ACS Group's Compliance Committee will assess whether ACS and its Group should continue to participate in them.