

## 5.5. MANAGEMENT OF RELATIONS WITH STAKEHOLDERS

The ACS Group defines stakeholders as groups with the ability to influence the achievement of the organisation's objectives or that may be affected by its activities. The basic principles of action that the ACS Group follows in relations with its stakeholders and the environment are based on compliance with current national and international

law, as well as the sustainability commitments entered into voluntarily by the ACS Group and included in the Group's Sustainability Policy.

The figure below indicates the main stakeholders with which the the ACS Group has relationships:



Likewise, in order to know and respond to the expectations of the stakeholders, and for the ultimate purpose of establishing relationships of trust with them, each one of the Group companies makes different channels of communication available to them.

These channels promote transparency, participation and active listening of all stakeholders. Responsible communication practices to prevent the manipulation of information and safeguard integrity and honour. For this reason, the communications are based on criteria of impartiality, clarity, precision, consistency and responsibility, notwithstanding the need for confidentiality in the execution of the activity.

These general communication principles are defined by the ACS Group in its Policy on Reporting Economic-Financial, Non-Financial and Corporate Information, and on Contacts and Implications with Shareholders and other stakeholders

aimed at, among other matters, establishing a general framework that promotes communication between ACS, its shareholders and other stakeholders.

The purpose of this Policy is also to define the general and specific channels established by ACS to implement and develop a strategy that facilitates communication, ensuring fair treatment of interlocutors and also establishing direct and indirect means of disseminating relevant economic, financial and non-financial and corporate information that, on both mandatory and voluntary basis, ACS provides to shareholders and markets in general.



**Policy for Communication of economic-financial, non-financial and corporate information, and regarding Contacts and Relations with Shareholders and Other Stakeholders**

STAKEHOLDER	COMMUNICATION CHANNEL	MAIN COMMITMENTS OF THE ACS GROUP
<p><b>CUSTOMERS</b></p> <p>Any entity or person that contracts or acquires the services or products marketed by the different ACS Group companies.</p> <p>The commitment to clients is addressed from a clear strategy, as included in the Group's Sustainability Policy.</p>	<ul style="list-style-type: none"> <li>- Group websites and Public reports.</li> <li>- Ethics Channel.</li> <li>- Corporate mailboxes.</li> <li>- Channels for submitting complaints/claims.</li> <li>- Satisfaction surveys.</li> <li>- Social networks.</li> <li>- Dossiers and press releases.</li> <li>- Meetings with clients.</li> <li>- Trade fairs and forums. Publication of relevant facts.</li> </ul>	<ul style="list-style-type: none"> <li>- Effective resolution of problems and incidents.</li> <li>- Ensuring the best technical and economic solutions.</li> <li>- Building stable, honest and trusted relationships.</li> <li>- Anticipating and tracking client needs.</li> <li>- Periodic measurement of satisfaction.</li> <li>- Ensure protection and confidentiality of information.</li> </ul>
<p><b>SHAREHOLDERS, INVESTORS AND FINANCIAL INSTITUTIONS</b></p> <p>Natural persons, legal entities and entities with capital interests or shareholdings in the ACS Group.</p> <p>The Group has a Contact and Implication Communication with Shareholders, Institutional Investors, Asset Managers, Financial Intermediaries and Voting Advisors, and the shareholders' right of information is included in various provisions of the General Meeting By-Laws.</p>	<ul style="list-style-type: none"> <li>- Group websites and relevant public reports and facts.</li> <li>- Ethics Channel</li> <li>- General Shareholders' Meeting.</li> <li>- Shareholder and investors section on the website, electronic forum and shareholder service office.</li> <li>- Investor Agenda and Investor Day.</li> <li>- Dossiers and press releases.</li> </ul>	<ul style="list-style-type: none"> <li>- Maximising shareholder profitability.</li> <li>- Information transparency.</li> <li>- Promotion of informed participation of shareholders in the ACS Group.</li> </ul>
<p><b>EMPLOYEES</b></p> <p>Any person who works for any company that forms part of the ACS Group.</p> <p>The ACS Group's General Code of Conduct constitutes a guide for the professional performance of all of the employees and executives of the Group. The group also has a number of policies that apply to employees that are specifically covered in Chapter 5.2 of this report.</p>	<ul style="list-style-type: none"> <li>- Group websites and Public reports.</li> <li>- Ethics Channel.</li> <li>- Intranet.</li> <li>- Workplace climate surveys.</li> <li>- Corporate communications.</li> <li>- Meetings.</li> <li>- Health and Safety Committees.</li> </ul>	<ul style="list-style-type: none"> <li>- Promoting integrity, professionalism and respect.</li> <li>- Promoting professional and personal development.</li> <li>- Ensuring equal opportunities, diversity and inclusion.</li> <li>- Promoting a culture and corporate values with which the people in the ACS Group identify.</li> <li>- Ensuring the highest levels of occupational safety and health.</li> <li>- Respect for Human Rights.</li> </ul>
<p><b>SUPPLIERS AND CONTRACTORS</b></p> <p>Persons or companies that provide their services or products to the ACS Group and are part of its supply chain.</p> <p>The ACS Group's Code of Conduct for Business Partners establishes the principles which all market operators must comply and expressly accept in order to establish commercial relationships with the Group.</p>	<ul style="list-style-type: none"> <li>- Group websites and Public reports.</li> <li>- Ethics Channel.</li> <li>- Periodic meetings.</li> </ul>	<ul style="list-style-type: none"> <li>- To ensure objective and impartial treatment in the selection of suppliers and contractors.</li> <li>- Responsible and sustainable management of the supply chain.</li> <li>- Compliance with supplier and subcontractor management rules and systems.</li> <li>- Analyse the level of compliance with these systems.</li> </ul>
<p><b>SOCIETY</b></p> <p>All those individuals, local communities, NGOs, industry associations, media, etc., that are part of the environment in which the ACS Group operates.</p> <p>To demonstrate its commitment to the economic and social development of the communities in which the Group operates, it relies on its Social Action Policy linked to its business strategy.</p>	<ul style="list-style-type: none"> <li>- Group websites and Public reports.</li> <li>- Ethics Channel. Participation in organisations and institutions.</li> <li>- Public relations department and press articles. Social networks.</li> <li>- Organisation of events, participation in forums, collaboration and volunteering.</li> </ul>	<ul style="list-style-type: none"> <li>- To promote the economic and social development of the countries in which the Group carries out its activities.</li> <li>- To drive forward the business and its sustainability To improve the Company's prestige and reputation</li> </ul>
<p><b>ADMINISTRATIONS AND REGULATORY AUTHORITIES (1)</b></p> <p>All representatives of local, regional and international governmental institutions and public entities with which the ACS Group is in constant communication.</p> <p>The commitments established by the Group in regard to the regulatory authorities and administrations are included in the Group's Sustainability Policy.</p>	<ul style="list-style-type: none"> <li>- Participation in organisations and institutions.</li> <li>- Participation in forums and events.</li> <li>- Official communication channels of the Administrations</li> </ul>	<ul style="list-style-type: none"> <li>- Continuous cooperation acting always in good faith.</li> <li>- Ensuring integrity and transparency in relationships by encouraging fair competition and the appropriate use of public resources.</li> </ul>

(1) In 2022, the ACS Group did not make any financial or in-kind contributions to political parties, as stipulated in the ACS Group Code of Conduct. The subsidies received by the ACS Group in 2022, as shown in the Group's Consolidated Balance Sheet, included in the Economic Financial Report published along with this report, totalled 2.04 million euros. For more information, see section 5.9 of this report.

ACS Group companies participate in different sector associations and other organisations aimed at promoting social, technological or environmental initiatives. The amount allocated to these associations in the year can be consulted in point 5.4. of this report. Some sectoral associations and organisations in which ACS Group companies participate are Aspel, Asade, Aseata, Asociación Empresas Constructoras de Madrid, Association des constructeurs de routes et grands travaux du Québec, Canadian Council for Public-Private Partnerships, Construction Industries of Massachusetts, Cámara de Comercio de España, CEOE, ECTP AISBL, Ecoembes, Florida Transportation Builders' Association, National Association Woman in Construction, National Safety Council, Pacto Mundial, Polish Association of Construction Employers, Seopan, 'Wirtschaft macht Klimaschutz, among others. More information on the participation of associations by HOCHTIEF, the Group's main company by volume of sales, can be found at the following link: <https://www.hochtief.com/contracts/>;



It should be noted that within the framework of the definition of material issues of this report, the ACS Group consults with its stakeholders to identify those areas of the company's management considered to be most significant. The results of the survey are provided in point 7.2. Identification of relevant issues.

## COMMITMENT TO INFORMATION TRANSPARENCY

One requirement for the ACS Group to be able to fulfil its mission of generating return for its shareholders and the society in which it operates is information transparency. The objective of this strategy is to ensure that its activity is as open as possible and that the interests of the company's clients and other stakeholders are respected.

This general objective of transparency is stated by means of the following guidelines:

- Conveying the Company's overall corporate strategies, as well as those specific to each of the Company's business divisions, to the outside world.
- Conveying the facts of the Group's business 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 helps to achieve business objectives and commercial activity.
- Maintaining a fluid relationship with the different stakeholders related to the Group.

Therefore, it is a basic principle of good governance for the Company to ensure transparency and maximum information quality, so that the public information of the Company and the Group is presented in a clear, complete, simple, orderly and understandable manner for all Company stakeholders. The ACS Group manages its commitment to transparency towards its stakeholders through the "Policy for Communication of economic-financial, non-financial and corporate information, and regarding Contacts and Relations with Shareholders and Other Stakeholders" aimed at, among other matters, establishing a general framework that promotes communication between ACS, its shareholders and other stakeholders, taking into account the particular role with regard to financial intermediaries, institutional investors, asset managers, voting advisers, credit assessment agencies and other market actors, in order to facilitate the transfer of information by the Company and, in particular, the exercise of their rights by shareholders, mainly those of attendance and voting at the General Shareholders' Meeting.

The purpose of this Policy is also to define the general and specific channels established by ACS to implement and develop a strategy that facilitates communication, ensuring fair treatment of interlocutors and also establishing direct and indirect means of disseminating relevant economic, financial and non-financial and corporate information.

Transparency Indicators	2021	2022
<b>Website</b>		
Visits to the website	223,061	203,089
Pages viewed	665,918	565,405
% of new visitors	86.4%	77.1%
<b>Shareholders &amp; Investors</b>		
Meetings organized by Investor Relations	172	184
Calls/emails from shareholders answered	980	1,196

