WATER EFFICIENCY FRAMEWORK AT ACS GROUP

(WATER CONSUMPTION REDUCTION INITIATIVES AND PROCEDURES FOR WATER RECYCLING/REUSE)

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Contents

1. Strategic context and commitment

Water is one of the planet's most vital and limited natural assets. It fuels ecological balance, drives economic productivity, and underlies the health and resilience of communities across the globe. Without it, neither ecosystems nor human development can thrive. In both natural and built environments, water supports a wide range of functions—from sustaining biodiversity to enabling hygiene, food security, and industrial innovation. As pressures on global water systems intensify due to climate change, population growth, and urbanization, the need for responsible stewardship has become increasingly urgent. Ensuring fair access to clean water and protecting its long-term availability are now central to global sustainability goals, making it a critical issue not only for society, but also for business.

Within ACS Group, water is not only an environmental concern, but a critical resource enabling the execution of our operations across the full infrastructure lifecycle. From upstream activities such as the manufacturing and supply of construction materials to on-site operations and downstream asset operation and maintenance, water plays an essential role. Its use spans from dust suppression and concrete mixing to sanitation and site logistics—making water efficiency a material factor in operational performance, cost control, and sustainability outcomes.

Our global footprint exposes us to a wide range of water-related challenges. ACS Group operates in diverse geographies, including water-scarce regions where access is limited or subject to seasonal stress, and others where extreme rainfall or flooding may pose operational risks. Furthermore, the types of infrastructure we deliver—ranging from transport and energy systems to social facilities and mining-related projects—demand distinct water usage profiles. As such, a one-size-fits-all approach is neither practical nor effective. Instead, we pursue tailored, context-specific water efficiency strategies that reflect local environmental conditions, regulatory frameworks, and project typologies. This allows us to focus our efforts where they can deliver the greatest environmental and operational return.

At ACS Group, water efficiency is embedded as a core principle of our environmental management system. We take a systematic approach to measuring, managing, and reducing water use throughout our value chain. This includes monitoring direct consumption on project sites, setting internal targets, promoting water reuse and recycling, and engaging suppliers and partners to improve upstream water performance. We prioritize solutions that not only reduce overall water withdrawal but also enhance resilience, such as the use of non-potable water, closed-loop systems, and smart monitoring technologies.

While the project execution phase typically represents the largest opportunity for efficiency gains, we also recognize the importance of addressing water intensity in material sourcing and in the long-term operational phase of the infrastructure we build. We work closely with our business units to identify best practices, disseminate knowledge across regions, and continuously improve performance through innovation and collaboration.

Given the scale and diversity of our operations, water efficiency and sustainable water management are recognized as material topics in ACS Group's sustainability agenda. They are fundamental to our ambition to operate responsibly, reduce our environmental footprint, and contribute to the resilience of the communities and ecosystems in which we operate.

Accordingly, as articulated in our 2025 Sustainability Master Plan, the Group has established a clear overarching objective: "Manage water resources responsibly".

This objective guides our collective efforts and is grounded in three core action areas: 1) Promoting initiatives to reduce water consumption and implement procedures for water recycling and reuse, 2) Monitoring water withdrawal in water-stressed regions with the aim of minimizing usage, and 3) Establishing a methodology for calculating the Group's water footprint, enabling more consistent tracking and decision-making.

As already stated, due to the global and diversified nature of ACS Group's business, spanning multiple sectors including construction, infrastructure, energy, and mining, and operating with distinct operational profiles in highly varied geographic contexts, the specific challenges and opportunities related to water efficiency differ significantly across our portfolio. Some companies operate in arid regions where even small reductions in water use can have significant impact; others manage water-intensive processes in regions with abundant supply but complex regulatory landscapes.

Accordingly, ACS Group applies a flexible, context-driven approach to water efficiency. Our commitment is embedded in the sustainability strategies of each of our companies, who tailor their initiatives and goals to the specific challenges and opportunities present in their locations and activities. This approach allows us to focus on what matters most: maximizing impact through relevant, actionable, and locally adapted water efficiency measures, while staying aligned with a shared vision of responsible water management. Across the Group, this results in a coordinated and scalable effort that strengthens our overall contribution to a responsible water management.

As an example of how this ACS-wide commitment is being implemented across Group, HOCHTIEF, which accounts for approximately 95% of ACS Group's total water consumption, has defined specific lines of action to enhance water efficiency across its operations. These include:

- Promote water protection on all projects.
- Measure and monitor water consumption on all projects.
- Implement water protection plans and execute corresponding measures in 100 percent of the projects in water-stressed areas.
- Implement measures to reduce water consumption.
- Achieve an annual water recycling/reuse rate of at least 10 percent of total water withdrawn.

2. Operational framework for water efficiency

ACS Group applies a structured and scalable approach to water management, rooted in the hierarchy of avoid, reduce, reuse, and recycle. This framework guides the design and implementation of water efficiency strategies across our companies, ensuring that actions are adapted to the specific characteristics of each geography, sector, and project type.

Water efficiency is addressed not as a stand-alone issue, but as a cross-cutting priority integrated into the way we plan, design, build, and operate infrastructure and services. Presently, our framework rests on five key pillars that allow each company within the Group to act according to local risks, opportunities, and operational profiles, while contributing to a shared ambition: to minimize our overall water footprint and enhance resilience across the value chain.

A. Monitoring and accountability

Accurate measurement is the foundation of effective water management. Across the Group, we are deploying advanced water monitoring systems to track consumption and assess the performance of reuse and recycling initiatives. The installation of water meters has become standard in most new construction projects, supporting transparency, enabling comparisons, and driving continuous improvement at project and portfolio levels.

In parallel, several companies integrate water consumption metrics into their ESG reporting and use internal tools—such as dashboards or site-level signage—to increase awareness and reinforce responsible behaviour in day-to-day operations.

B. Policies and design standards

We have developed and implemented internal policies and technical guidelines that promote water efficiency across all project phases. These policies encourage the selection of water-efficient technologies, promote responsible design choices, and embed water considerations into procurement and execution practices.

In addition, ACS Group companies pursue internationally recognized sustainability certifications, which reinforce performance standards. These include:

- LEED (Leadership in Energy and Environmental Design) which integrates specific water use and reuse criteria
- Envision, which addresses both construction- and operation-phase consumption
- EU Ecolabel, which supports water use reduction and improved wastewater management, particularly in service-related operations.

These frameworks provide common benchmarks, encourage innovation, and facilitate external validation of our progress.

C. Circular Water Management

ACS Group actively promotes circularity in water use, with a focus on maximizing the utility of every drop through reuse, treatment, and substitution strategies. Initiatives under this pillar include:

- Recovery and treatment of greywater from non-potable sources, used for site cleaning, irrigation, or sanitation
- Rainwater harvesting, particularly in newly designed projects, to support local uses such as landscaping, cleaning, and dust suppression
- Reuse of process water in industrial and service operations, often following appropriate treatment for internal uses such as equipment cleaning, material preparation, or cooling
- Substitution of potable water with alternative sources (e.g., treated water from settling ponds or recycled wastewater) where regulatory and technical conditions allow
- Deployment of water-efficient cleaning technologies, such as pre-impregnated systems or low-consumption automated equipment, reducing both direct water use and wastewater generation
- Reuse of water in auxiliary systems, such as sanitary installations or vehicle and machinery cleaning, particularly in operations with consistent non-potable water availability.

These actions allow us to significantly reduce our reliance on freshwater sources while increasing operational efficiency and environmental performance.

D. Capacity building and awareness

Human behavior plays a central role in water use. We invest in training programs for employees and subcontractors to foster awareness and ensure proper use of water-saving equipment and practices. Specialized courses in environmental education have been developed in several areas of the Group, with dedicated modules on water use reduction, pollution prevention, and sustainable site management.

Sector-specific manuals and technical guidance are also used to disseminate best practices and encourage consistency across different types of activities and regions. In addition, internal communication tools such as site posters and awareness campaigns support behavioral change and promote a shared culture of water responsibility.

E. Value chain and site-level implementation

Water efficiency considerations are increasingly being integrated into how we engage with suppliers, subcontractors, and clients. In certain cases, water-related expectations are included in procurement processes, and we are working to promote more responsible sourcing and alignment on water performance throughout the lifecycle of infrastructure assets.

At the project level, efforts are being made to consider water management measures from the early stages, including during design development, construction planning, and equipment selection. This enables project

teams to identify opportunities for water savings that are technically and economically viable within their local context.

In summary, this operational framework ensures that ACS Group's water management efforts are both structured and adaptable, combining Group-wide guidance with local implementation.

3. Implementation and results

ACS Group's water efficiency framework is implemented through a wide array of initiatives across its companies and geographies. While the overall approach is shared, the specific actions reflect the local context, operational needs, and technical possibilities of each business. To demonstrate how the five core pillars of our framework are put into practice, the table below presents a selection of good practices implemented by ACS companies around the world. These examples showcase how strategic principles are translated into concrete results, driving progress in water management across different phases of the project lifecycle.

Type of Measure	Company	Description of the Action	Project
Capacity Building and Awareness	HOCHTIEF Group	Internal campaigns to raise awareness on water protection and efficiency	Group-wide
Capacity Building and Awareness	Various companies	Use of posters and environmental education materials to promote water-saving behaviour	Various
Circular Water Management	Various companies	Reuse of non-potable or recycled water in auxiliary services such as irrigation, cleaning, or sanitary applications	Various
Circular Water Management	HOCHTIEF UK	Rainwater harvesting system installed for office toilet cisterns	Snowdonia Visual Improvement Project
Circular Water Management	DRACE	Reuse of treated wastewater for irrigation and other internal uses	WWTP operations
Circular Water Management	HOCHTIEF PPP Solutions	Installation of water-saving fittings and rainwater use for irrigation	Social infrastructure projects (various)
Circular Water Management	HOCHTIEF Building	Use of collected rainwater for cleaning construction equipment	Continentale Versicherung HQ – Dortmund
Circular Water Management	Flatiron	Reuse of water from groundwater extraction using filtration and pH balancing systems	Anderson Dam Project – California
Circular Water Management	Flatiron	Reuse of polymer slurry water for drilling operations	US 50 Highway Project
Circular Water Management	Flatiron	Reuse of drilling water using a closed-loop system with banker tanks	Ventura Slope Restoration Project – California
Circular Water Management	Dragados	Reuse of water used in waterproofing tests for other construction uses	Residential Project – Mijas

Type of Measure	Company	Description of the Action	Project
Circular Water Management	Flatiron	Internal washout systems in concrete delivery trucks to reduce water use	US 50 Highway Project
Circular Water Management	Clark Builders	Rainwater harvesting for dust control and equipment washing	Residential Project – Calgary, Alberta
Circular Water Management	Iridium – ACS D&E	Implementation of smart water systems, remote metering, water reuse, and green infrastructure to enhance water efficiency and circularity in public infrastructure	Wyndham City Council – Australia
Monitoring and Accountability	HOCHTIEF Infrastructure	Installed sensors on water taps to monitor consumption and identify leaks	Construction site in Poland
Monitoring and Accountability	Flatiron	Installation of rock check dams to manage rainwater runoff and protect surrounding water bodies	DIA Taxiway EE – Denver Airport
Monitoring and Accountability	Dragados	Use of compact decanter to treat groundwater before discharge	Cantabria Museum Project
Monitoring and Accountability	Iridium	Established and monitored a KPI to limit river water intake to a maximum of 8.2 litres per second (ecological threshold), supported by awareness campaigns for staff and passengers	Complejo Los Libertadores – Chile
Policies and Design Standards	Iridium – ACS D&E	Application of sustainable design standards for all new data centres, including water usage effectiveness (WUE) criteria and other resource efficiency measures	Australia
Policies and Design Standards	Dragados & Tecsa	Design modification to avoid construction within a riverbed, preserving water quality	Atxondo-Abadiño Project
Policies and Design Standards	Turner Construction	Use of rainwater in a retention pond to suppress dust	Data Centre – Midwest USA
Policies and Design Standards	CLECE	Implementation of EU Ecolabel-certified cleaning protocols, which include reduced water consumption and wastewater discharge through the use of ecological products and methods	Various

4. Outlook and future ambitions

The growing integration of water efficiency measures across ACS Group reflects a decisive step toward reducing our overall water footprint and strengthening environmental resilience across our operations. As our companies adopt increasingly sophisticated technologies, management systems, and behavioural strategies, the Group remains firmly committed to enhancing its performance in responsible water use.

Looking ahead, we aim to consolidate and expand these efforts across all phases of the infrastructure lifecycle, from design and construction to operation, maintenance, and end-of-life. We will continue promoting the application of proven solutions while encouraging the adoption of emerging practices that improve efficiency, reduce dependency on potable sources, and increase circular water use.

Particular emphasis will be placed on extending our water stewardship approach, within the scope of our influence, to upstream and downstream activities, recognizing that a large share of water-related impacts can occur beyond our direct operations. This includes deeper engagement with suppliers to align them with ACS Group's sustainability principles, encouraging the use of water-efficient products and processes, and progressively integrating reliable, transparent, and comparable water-related data into our reporting systems.

As our clients increasingly seek resilient, sustainable infrastructure, ACS Group will also work to embed water efficiency considerations, within its scope of its influence, into project design and delivery models. In doing so, we will contribute not only to the responsible use of this critical resource but also to the broader transition toward water-smart infrastructure systems and operations that deliver long-term value for communities and ecosystems.