



## GENERAL SUSTAINABILITY POLICY

Reference	8_Sustainability Policy _5_2024
Title of the <i>Standard</i>	General Sustainability Policy
Geographical scope	Worldwide
Category	Policy
Approval date	19 December 2024
Approval body	Board of Directors
Current version	V5

Important information about this document	
Identification of the document	Sustainability Policy
Reference	8_Sustainability Policy_5_2024
Territorial scope of application	Worldwide
Section of other Standards covered	Code of Conduct
Replaced standards	Former version dated 28 July 2022
Repealed standards	None
Main body overseeing compliance	Audit and Sustainability Committee
Proposing body or department	Audit and Sustainability Committee
Author	Sustainability Directorate
Approval body	Board of directors
Date of approval of the current version	19 December 2024
Applicable as from	19 December 2024
Published and available at	Extra-Net and Intra-Net

## Change control

Version	Date	Approval body	Author	Summary of changes
1	29 July 2016	Board of directors	Corporate General Management	
2	17 December 2020	Board of directors	Compliance Committee	Adaptation to the new wording of recommendations no. 54 and 55 of the Corporate Governance Code of listed companies modified by the CNMV (National Securities Market Commission) on 26 June 2020.
3	27 July 2021	Board of directors	Compliance Committee	Modification of the Ethical Channel of the ACS Group. Adaptation to Directive (EU) 1937/2019 of 23 October 2019 on the protection of persons who report breaches of Union law.
4	28 July 2022	Board of directors	Compliance Committee	Adaptation to the proposed European Sustainability Corporate Due Diligence Directive (CSDD Directive).
5	19 December 2024	Board of directors	Sustainability Directorate	Adaptation to Directive (EU) 2022/2464 on sustainability reporting to Delegated Regulation (EU) 2023/2772 and to Directive (EU) 2024/1760 on corporate sustainability due diligence.

## CONTENTS

<b>1.</b>	<b>INTRODUCTION</b> .....	<b>5</b>
<b>2.</b>	<b>DEFINITIONS</b> .....	<b>5</b>
<b>3.</b>	<b>PURPOSE</b> .....	<b>7</b>
<b>4.</b>	<b>SCOPE OF APPLICATION</b> .....	<b>7</b>
<b>5.</b>	<b>PRINCIPLES OF ACTION</b> .....	<b>8</b>
<b>6.</b>	<b>REGULAR UPDATING OF MATERIAL SUSTAINABILITY AREAS</b> .....	<b>10</b>
<b>7.</b>	<b>SUSTAINABILITY DUE DILIGENCE</b> .....	<b>10</b>
<b>8.</b>	<b>RELATIONSHIP WITH STAKEHOLDERS</b> .....	<b>11</b>
<b>9.</b>	<b>BUSINESS PARTNERS IN THE CHAIN OF ACTIVITIES</b> .....	<b>12</b>
<b>10.</b>	<b>TRANSPARENCY, VERACITY AND INTEGRITY OF SUSTAINABILITY INFORMATION</b> .....	<b>12</b>
<b>11.</b>	<b>SUSTAINABILITY GOVERNANCE</b> .....	<b>13</b>
	11.1. Board of directors .....	13
	11.2. Audit and Sustainability Committee.....	14
	11.3. Sustainability Department and Governance and Compliance Group .....	14
	11.4. Decentralization and coordination at Group level .....	14
<b>12.</b>	<b>WHISTLE-BLOWING AND COMPLAINTS CHANNELS</b> .....	<b>15</b>
<b>13.</b>	<b>APPROVAL, DISSEMINATION AND ENTRY INTO FORCE</b> .....	<b>15</b>
<b>14.</b>	<b>ADDITIONAL CONSIDERATIONS</b> .....	<b>16</b>

## 1. INTRODUCTION

The Board of Directors of ACS, Actividades de Construcción y Servicios, S.A. (hereinafter "ACS" or the "Organization"), as a listed company, has the non-delegable legal authority to establish the strategic and management guidelines of ACS and of the group of companies of which ACS is the parent company (hereinafter the "ACS Group" or the "Group") and, in particular, those related to actions in the area of sustainability, an authority that has also been included in the Company's Board of Directors' Rules of Order.

In accordance with the above, at its meeting on 29 July 2016 the Company's Board of Directors approved the Sustainability Policy, which has been updated on several occasions in order to incorporate into said policy legislative developments, standards of conduct and best practices of good corporate governance published since that date.

In this sense, in order to adapt the provisions of the Policy, among others, to the regulatory changes promoted by the European Union (hereinafter the "EU") on corporate sustainability reporting and corporate sustainability due diligence matters and their impact on the regulations applicable to ACS, the Board of Directors of ACS has approved, following a proposal from the Audit and Sustainability Committee, the update of the Sustainability Policy, in order to adapt its content to the aforementioned developments in sustainability regulations.

## 2. DEFINITIONS

For the purposes of this Policy, the following terms shall be interpreted in accordance with the definitions set forth below:

- **ACS/Organization/Company:** ACS, CONSTRUCCIÓN Y SERVICIOS, S.A.
- **Actor in the Value Chain:** Individuals or entities in the upstream or downstream Value Chain. The actor is considered downstream (e.g. distributors and customers) when it receives products or services from the company; it is considered upstream (e.g. suppliers) when it provides products or services that are used in the production of the company's own products or services.
- **Chain of activities:** The activities of the Business Partners involved in the upstream and downstream phases of activities relating to the production of goods or the provision of services by ACS and its Group companies.
- **Value chain:** The full range of activities, resources and relationships related to the company's business model and the external environment in which it operates.

- **Code of Conduct:** The ACS Group Code of Conduct.
- **Code of Conduct for Business Partners:** The Code of Conduct for Business Partners of the ACS Group.
- **ACS Group/Group:** ACS and the companies of the group of companies of which ACS is the parent company. For the purposes of this Policy, also “Group entities/companies/corporations” and “entities/companies/corporations integrated in the Group”.
- **Interest Groups/Stakeholders:** those collectives that may affect or be affected by the activities of the ACS Group and, in particular, the directors, managers, employees, workers’ representatives, trade unions and Business Partners of the Group, as well as consumers, groupings, communities or entities whose rights or interests are or could be affected by the products, services and operations of the Company, its subsidiaries and/or its Business Partners, including national environmental and human rights institutions, civil society organisations whose purposes include the protection of the environment and the legitimate representatives of such persons, groupings, communities or entities.
- **IRO:** Impacts, risks and opportunities.
- **Members of the Organization:** members of the governing bodies, managers, employees, workers or temporary employees or employees hired under a collaboration agreement, and interns or volunteers of ACS.
- **Standard/s:** ACS corporate texts of a different nature, such as Policies, Regulations or Procedures, among other texts, which, where applicable, project onto the ACS Group.
- **UN:** United Nations.
- **Environmental Policy:** The ACS Group's Environmental Policy.
- **Human Rights Policy:** The ACS Group's Human Rights Policy.
- **General Risk Control and Management Policy:** The ACS Group's General Risk Control and Management Policy.
- **Sustainability Policy/Policy:** This ACS Group's General Sustainability Policy.
- **Due Diligence Protocol:** The Corporate Due Diligence Protocol on sustainability.

- **Business Partners:** Any legal or natural person with whom ACS or the Group companies maintain a commercial or business agreement in their Chains of activities. These include, by way of example, but are not limited to, suppliers or providers of goods or services, intermediaries such as agents or commission agents, external advisors or *joint ventures*.
- **EU:** European Union.

### 3. PURPOSE

The policy is based on the corporate values of ACS which are detailed in the Code of Conduct. Its main objective is to establish the principles that should govern the sustainability management strategy and guidelines of ACS with projection onto the Group.

The principles established in this Policy must be interpreted in accordance with the regulations applicable to ACS and to the companies in its Group, in connection with the different Standards that make up the ACS Corporate Governance System and its projection onto the Group; these include, among others, the Environmental Policy, the Human Rights Policy, the General Risk Control and Management Policy, the Code of Conduct for Business Partners and the Due Diligence Protocol.

Without prejudice to the foregoing, ACS continuously monitors developments in sustainability matters that may be relevant to ensure that the internal frameworks for action are up to date and based on an analysis of internationally recognised rules and standards for their integration when these are relevant and applicable to ACS and its Group.

### 4. SCOPE OF APPLICATION

This Policy is applicable to all ACS activities, and compliance therewith is therefore mandatory for members of the governing bodies, managers, employees, workers or temporary employees or employees under collaboration agreements, and ACS interns or volunteers (hereinafter the "**Members of the Organization**"), encouraging all staff to perform under the same paradigm, while implementing this Policy throughout the entire ACS chain of activities and projecting the commitments made in this Policy onto the companies of the Group.

Likewise, the Group's companies will monitor that the principles of the Policy are applied, where applicable and to the extent appropriate, to the Business Partners, thus taking into account the Chain of Activities.

ACS will also promote the application of the principles of this Policy with respect to participating entities and, where appropriate, with respect to joint ventures and other equivalent associations, whether domestic or foreign.

In turn, in the implementation of the principles of the Policy, ACS and the Group companies will collaborate constructively with their stakeholders, in order to establish channels of communication, consultation and contact that contribute to the better performance of the Group and its business Partners in matters of sustainability.

## 5. PRINCIPLES OF ACTION

The sustainability of the economy and society, the promotion and respect of human rights, social and labour rights, environmental protection, fight against climate change, the improvement of communities, innovation and the management of the legitimate interests of its stakeholders are fundamental pillars of the ACS Group's strategy and therefore guide all its activities with the aim of guaranteeing the creation of sustainable value in the long term.

To this end, in order to ensure the effectiveness of the strategic sustainability lines established by the Company's Board of Directors which projects onto the Group, and to contribute effectively to the sustainability of the economy and society, ACS subscribes and promotes, among others, the following principles in all areas related to sustainability:

- **Creation of long-term sustainable value:** Development of activities in accordance with an economically acceptable, environmentally sustainable and socially inclusive management model aimed at maintaining the Group's global leadership, optimising the resources used, managing environmental impacts and generating shared value for all its stakeholders.
- **Ethics and Integrity:** Compliance with legislation in force at all times in the markets in which the Group operates, taking into account the spirit and purpose of the regulations, observing ethical behaviour in all actions and implementing measures to prevent, detect and eradicate corruption and any other practice that constitutes a breach of the corporate values defined in the Code of Conduct or that could compromise the Group's reputation.

- **Sustainability due diligence:** Adopt appropriate measures and implement internal frameworks and procedures to identify, assess, prioritise, prevent, mitigate and, where appropriate, remedy actual or potential adverse impacts on human rights and the environment arising from operations, products and services.
- **Applicability to the Chain of Activities:** Ensure respect for and compliance with the Group's sustainability commitments by Business Partners throughout the Chain of Activities, making reasonable efforts to support and collaborate in the implementation of the measures necessary to ensure their effectiveness.
- **Transversality:** Integration from a double materiality perspective of all management systems with the aim of identifying priority areas relating to sustainability and evaluating their impact on the sustainable value creation strategy.
- **Equality:** Promotion and management of talent without regard to circumstances related to race, nationality, social or ethnic origin, age, sex, marital status, sexual or gender orientation or identity, ideology, political or union opinions, beliefs, cognitive and/or physical abilities, religion or any other personal or social condition.
- **Safety and Health:** Promote the safety and health of persons who provide services to ACS Group companies, ensuring the highest standards in this area, managing risks and promoting a safe and healthy work culture and environment with the aim of eliminating or minimising the risks associated with the activities of the Group companies through prevention and monitoring systems, adaptation to international standards and the implementation of training and awareness-raising activities on the subject.
- **Excellence and Innovation:** Promoting research, development and innovation, ensuring appropriate use of new technologies in order to modernize organizational and production processes in such a way that they contribute to the decarbonization of the economy and the creation of sustainable value.
- **Participation and Communication:** Promoting participation and active listening to the concerns and legitimate expectations of the Group's stakeholders by maintaining permanent communication channels.
- **Information transparency:** Promoting information transparency as a fundamental principle and transmitter of credibility and trust through the implementation of communication practices based on criteria of truthfulness, clarity, precision, coherence, responsibility and speed of dissemination, thus allowing shareholders and other

stakeholders to achieve a high level of understanding of the activities and the value chain of the Company and its Group.

These principles of action constitute the axes on which the priority objectives of the Sustainability Master Plans are defined, and which are used by the Group as parameters to assess performance in sustainability matters and enable progress towards their achievement to be measured. In this sense, these Plans are aligned with not only the aforementioned principles but also the Group's corporate strategy on sustainability and, as a consequence, with the legitimate expectations of the Group's stakeholders. In this sense, the priorities are to: promote the global transition towards sustainable infrastructure; be a key player in economic development by integrating specialized and diverse talent; and be a benchmark in good business practices with governance committed to sustainability.

In turn, these strategic priorities are developed in different ACS Standards with projection onto the Group.

## **6. REGULAR UPDATE OF MATERIAL SUSTAINABILITY AREAS**

ACS identifies the IROs in terms of the sustainability of its activities and validates and assesses them with the different Group companies on a scale of relative importance, both from the financial perspective and in relation to the impact they could have on the economy, human rights, environment and society in general (impact), implementing internal processes to analyse the results obtained in order to prioritise the aforementioned IROs based on their importance in a Double Materiality Matrix.

In this regard, ACS periodically reviews and assesses the IROs to identify, manage and update resources, policies, actions, plans and targets in line with the principle of continuous improvement in sustainability.

## **7. SUSTAINABILITY DUE DILIGENCE**

ACS is aware of its responsibility as the parent company of the ACS Group to assume a relevant role in the respect for and protection of human rights and the environment in accordance with current regulations and international conventions and standards applicable in the markets in which it operates.

With a view to achieving this objective, ACS has approved a series of Standards, disseminated internally and externally, which aim to promote the adoption of appropriate measures to identify and assess the actual or potential adverse impacts on human rights and the environment arising from the activities of the Group and those of its Business Partners in the Chain of Activities, as well as to prevent, mitigate and, where appropriate, repair the negative consequences of the aforementioned impacts; these measures include, most notably, the Human Rights Policy, the Environmental Policy, the Sustainable Procurement Policy, the Code of Conduct for Business Partners and the Due Diligence Protocol.

In this regard, within the framework of the preparation of the Double Materiality Matrix and after considering the risks related to the Group's sectors of activity, their geographic locations and their specific risk factors, ACS identifies priority areas of action for corporate sustainability due diligence. And in relation to these priority areas, the Due Diligence Protocol sets out the basic guidelines for diligent sustainability performance.

## 8. RELATIONSHIP WITH STAKEHOLDERS

For ACS and the companies forming part of its Group, impartial, responsible, coherent and full communication with stakeholders is essential for maintaining relationships of trust that increase loyalty and confidence. Likewise, maintaining appropriate communication channels with stakeholders is of great importance to the Group as it allows for increased knowledge of their needs and interests and provides feedback that can be implemented in the continuous improvement process, thus enabling the creation of shared value.

Thus, ACS has identified the following as its main stakeholders: Shareholders and Investors, Persons, Employees, Clients, Business Partners, Communities and Environment, and Administrations and Regulatory Authorities.

In any case, relations with stakeholders will be governed by the following principles:

- **Promotion of respect** as a mechanism for building mutual trust.
- **Information transparency**, communicating relevant information in relation to the Group under the principles of transparency and veracity of information.
- **Participation and involvement** by providing channels, mechanisms or tools that enable constant, two-way communication.
- **Collaboration** in order to contribute to the effectiveness of the ACS Group's sustainability strategy.

- **Identification and comprehension of concerns and expectations** regarding sustainability issues related to the Group's activities.
- **Periodic review of mechanisms** for relationships to ensure their effectiveness and incorporate practices or tools that enable their improvement.

All relations with stakeholders will be developed in full compliance with privacy and data protection regulations, also establishing the relevant information security measures.

## 9. BUSINESS PARTNERS IN THE CHAIN OF ACTIVITIES

The management of the Chain of activities is one of the main material aspects for ACS and the companies integrated in its Group. In this sense, commitment to its Chain of activities is key to ensuring a responsible model in which the quality of services and products results in compliance with high standards of performance and the promotion of sustainable practices.

The relationship model for Business Partners established by ACS with projection onto the Group seeks to guarantee a responsible, equitable and ethical selection process, adapted to the operational needs of ACS and each company of the Group. Therefore, the integration of sustainability aspects in the management of the Chain of activities is part of the commitment to develop a business model in which the quality of services and products leads, in turn, to compliance with high standards of ethics and the promotion of sustainable practices.

In this regard, the Code of Conduct for Business Partners, based on the values that guide the behaviour of ACS and the companies belonging to its Group at all times, establishes the basic principles of action that must govern the relationship with Business Partners and, in turn, the Sustainable Procurement Policy establishes the principles that govern the procurement and supply process of ACS which project onto the Group.

## 10. TRANSPARENCY, VERACITY AND INTEGRITY OF SUSTAINABILITY INFORMATION

For ACS and the companies forming part of its Group, the transparency, veracity and integrity of information are essential elements for building long-term relationships of trust with its shareholders, investors and, in general, with its different Stakeholders throughout its entire Value Chain.

In accordance with the above and for users of the Sustainability Report to understand the Group's material environmental impacts and the effects of sustainability risks and opportunities on the Group's development, performance and position, timely and complete reporting will be provided on all matters specified in the applicable regulations and, in particular, on:

- The processes through which IROs are identified, assessed and managed in relation to sustainability.
- How the Group's strategy and business model interact with its sustainability-material IROs, including how they are addressed.
- The performance and progress made by the Group in relation to sustainability matters.
- The governance processes, controls and procedures used to monitor, manage and oversee sustainability-material IROs.

The ACS Group companies will provide the Company with all necessary information relating to the matters referred to above and will cooperate to comply with the principles and commitments of ACS regarding transparency, veracity and integrity of sustainability information.

In this regard, the ACS Sustainability Report will be verified externally in accordance with the terms provided for by law and will be presented annually to the ACS General Shareholders' Meeting as a Sustainability Report for approval as a separate item on the agenda.

## **11. SUSTAINABILITY GOVERNANCE**

Sustainability governance is essential to both seize opportunities and manage and mitigate impacts and risks related to sustainability issues. In this sense, the Policy establishes or references the pillars of sustainability governance in ACS with projection onto the Group:

### **11.1. Board of directors**

The Board of Directors of ACS focuses its activity on the general function of defining strategic and management guidelines at Group level, including basic sustainability commitments, providing a framework within which this Policy is encompassed.

In this regard, the Board of Directors of ACS is responsible for supervising the implementation, development and application of this Policy through the Audit and Sustainability Committee.

## **11.2. Audit and Sustainability Committee**

Pursuant to Article 26 of the Regulations of the Board of Directors, the Audit and Sustainability Committee of ACS is responsible for evaluation and periodic reviewing the Company's sustainability policy in order to ensure that it fulfils its mission of furthering the corporate interest and taking into account, as appropriate, the legitimate interests of other Stakeholders, and also to ensure that the Company's environmental and social practices are in line with the defined strategy and policy, also assessing the relationship processes with the main stakeholders.

In this regard, the Audit and Sustainability Committee will ensure, through its supervisory and control functions, the implementation and development in the Company of this Policy and the measures adopted for its implementation, and will review and, where appropriate, propose its update to the Board of Directors.

Likewise, the Audit and Sustainability Committee is responsible for supervising and evaluating the process of preparing and presenting information on sustainability, ensuring its integrity, and is also responsible for supervising the effectiveness of the Company's sustainability risk control and management systems.

## **11.3. Sustainability Directorate and Governance and Compliance Committee**

It is the responsibility of the Sustainability Department of ACS to monitor compliance with the sustainability strategy defined by the Board of Directors, as well as the integrity and veracity of the information that the Company must disseminate in compliance with the regulations applicable at any given time. In turn, the Sustainability Department will monitor and supervise the sustainability strategy, the implementation of the Master Plans on sustainability in force at any given time and will promote the development of internal regulations on sustainability through procedures, protocols and other internal standards, to monitor compliance with the sustainability strategy of ACS and its Group, reporting periodically to the Audit and Sustainability Committee within the scope of their respective areas of competence.

The Sustainability Department is part of the Governance and Compliance Committee of ACS in order to provide it with governance support in the development of the aforementioned internal regulations.

## **11.4. Decentralization and coordination at Group level**

The ACS Group is structured according to a decentralised management model and carries out its activity through a large group of companies that share the culture and values of ACS, while each operates independently in their respective functional and responsibility areas.

In this regard, the implementation, monitoring, supervision and management of the sustainability strategy is the responsibility of the different Group companies within the framework of their respective functional and responsibility areas, in accordance with their characteristics and the regulatory framework applicable to them in each case, respecting in all cases the principles and commitments of this Policy, as well as the Standards established by the Company for the purposes of coordination of the Group.

The entities forming part of the ACS Group should develop their own standards, which must always comply with the provisions established in this Policy and in other internal regulations on the matter established by ACS with projection onto the Group. In any case, the Group entities will provide the Company, in a timely manner and in the adequate format, with necessary and requested information on any aspect related to any matter within the scope of sustainability, and in particular for the definition and monitoring of the sustainability strategy at Group level, its Sustainability Plans, its Policies and, likewise, for the fulfilment of all obligations corresponding to ACS, particularly in relation to the transparency, veracity and integrity of the information on sustainability.

## **12. WHISTLE-BLOWING AND COMPLAINTS CHANNELS**

All Members of the Organization and, in general, authorized persons who are aware of or have reasonable suspicion of any breach of the commitments undertaken in this Policy must report said breach through the channels provided for this purpose, in accordance with the provisions established in the Policy on Operation of the Ethical Channel of ACS.

## **13. APPROVAL, DISSEMINATION AND ENTRY INTO FORCE**

This Policy will be applicable after its approval by the Board of Directors of ACS on the date indicated at the beginning of this document, and shall be of mandatory application from that moment forward, without prejudice to the fact that ACS and the Group companies may avail themselves of the deadlines provided for in the applicable regulations with respect to the enforceability of corporate sustainability due diligence obligations.

The Policy shall be available on the Company's corporate website ([www.grupoacs.com](http://www.grupoacs.com)) and shall be communicated to all companies in the Group.

#### **14. ADDITIONAL CONSIDERATIONS**

Although this Standard may be translated into different languages, the official version thereof, for the purposes of interpretation, shall be the Spanish version.