

3. ESRS E-3. Water

As part of its commitment to sustainability, the ACS Group integrates responsible water management as a key element into its management model. In line with its mission to responsibly manage water resources, the ACS Group promotes initiatives aimed at reducing water consumption, reusing this resource and improving its efficiency in all the ACS Group's operations. Through the adoption of innovative practices and process optimisation, the ACS Group seeks to minimise its impact on water resources, complying with applicable legislation and promoting sustainable water management in the environments in which it operates.

To strengthen a consistent and coordinated approach at corporate level, the ACS Group Water Task Force was established in 2025, led by the Sustainability Department and comprising expert managers from the Group's main companies. This task force facilitates the harmonisation of criteria, the exchange of experiences and the identification of common approaches to water management, in response to growing regulatory and stakeholder expectations. In this context, progress was made during the year on compiling and consolidating an overview of the companies' current status regarding water management objectives, indicators and practices, as well as on developing methodological frameworks to support the water risk analysis and the standardisation of key concepts and definitions.

Water management is an essential strategy to guarantee the long-term sustainability of the infrastructures and services offered by the ACS Group. This approach not only reduces consumption and negative impacts on aquatic ecosystems, but also contributes to the preservation of this vital resource for communities and productive activities. It also reinforces the ACS Group's ability to respond to stakeholder expectations, strengthen its competitiveness, and anticipate growing environmental and regulatory challenges in a context of global water scarcity.

Water management is closely interlinked with other environmental topics, in particular it is linked with climate change and biodiversity. Climate change directly influences phenomena such as droughts and desertification, which in turn have an impact on biodiversity loss. In response to this reality, the ACS Group addresses these aspects in an integral manner, adopting a holistic vision that enables their interconnections to be understood and managed, and avoiding treating them as independent areas.

During the reporting year, the ACS Group made progress on implementing a geospatial analysis tool based on geographic information systems, which enables environmental screening of projects from the early stages. This tool integrates water stress and water risk indicators alongside other environmental factors, including biodiversity, with the aim of consistently identifying projects located in areas of greater sensitivity or exposure. The results of this screening support the prioritisation of water efficiency measures and the establishment of operational controls at project level, thus enhancing the traceability and comparability of the approach across companies and regions.

3.1. Management of Impacts, Risks and Opportunities

3.1.1. ESRS 2 – IRO 1 Description of the processes to identify and assess material impacts, risks and opportunities

All the information related to IRO-1 on the processes for identifying and assessing impacts, risks and opportunities associated with water is provided in section [0.3.1. IRO-1:Description of the process to identify and assess material Impacts, Risks and Opportunities](#).

3.1.2. E3-1 Policies related to water

To implement its strategy, the ACS Group has put a range of policies in place that directly address water management, as well as the implementation of the various strategic priorities established in relation to this issue, as described in section [0.5.1. MDR - P: Policies adopted to manage material sustainability matters](#), through which material IROs are managed.

3.1.3. E3-2 Actions and resources related to water

The ACS Group has various actions and resources to manage the material IROs identified in the activities of its own operations in relation to sustainable water management. Through specific actions aimed at reducing consumption, more efficient practices are implemented to treat wastewater properly before it is discharged. It should also be noted that, in those areas of high water stress where the Group's operations may have a significant impact, ACS pays special attention to reducing water consumption, both in its own activities and in those related to its value chain. All the actions described here are linked to the targets of the 2025 Sustainability Master Plan and are carried out on an ongoing basis. It is planned to continue implementing them over the coming years (in the medium and long term).

In June 2025, the ACS Group published the ACS Group Water Efficiency Framework, which sets out a structured and scalable approach to efficient water management, based on the hierarchy of avoiding, reducing, reusing and recycling water, and tailored to the geographical and operational diversity of its activities.

This approach is based on five pillars: (i) monitoring and accountability by measuring and tracking of consumption; (ii) designing policies and standards that incorporate water efficiency criteria and recognised certifications; (iii) circular water management through reuse, treatment and substitution of sources; (iv) training and awareness-raising to reinforce best practices; and (v) progressive integration of water considerations into the value chain and project-level management.

In line with this common framework, the Group's companies implement measures tailored to their local context, including projects in areas experiencing water stress and operations with different consumption profiles. To highlight the importance of this issue, Hochtief has set out specific courses of action aimed at, among other things, strengthening water protection in projects, monitoring water consumption, implementing protection plans in areas experiencing water stress, and promoting recycling and reuse.

Water protection plans in water-stressed areas

[Link to policies](#)

Environmental policy

Description of the action

Each of the ACS Group's operating units supervises projects in areas of high water stress and draws up a specific water protection plan for each project, based on an internal ACS Group model. This plan identifies the relevant water stress factors and establishes processes and strategies to minimise water consumption. The measures include implementing best practice management initiatives, enforcing water quality standards, and monitoring discharge and drainage processes. Clear timelines are also specified for all the methodologies and measures introduced to continuously monitor, measure and analyse water consumption.

The effectiveness of the measures is periodically evaluated to identify opportunities for improvement and to implement corrective actions where necessary. The water protection plans are regularly updated to maximise their effectiveness and comply with the set targets. The measures included in these plans are adapted to the specific characteristics of each project. Some examples of these measures are:

- Using soil binders or vegetation instead of water for dust suppression on construction sites.
- Compaction with low humidity.
- Wastewater filtration systems to ensure water quality.
- Sediment and erosion controls to prevent negative impacts on nearby bodies of water.
- Rainwater retention systems to minimise water abstraction.

The progress on these initiatives is monitored through the regular collection of data recording project-specific water consumption in water-stressed areas. The results are published annually in section 3.2.2. Water Consumption of the Sustainability Report, ensuring transparency and a commitment to sustainable water resource management.

Reducing water consumption through recycling and reuse

Link to policies	Environmental policy
Progress on the actions	In 2025, 2,086,986 cubic metres of water were recycled and reused (including Thiess and Dornan).

Description of the action

The ACS Group is implementing a range of measures, taking into account all the sites and regions where the Group operates, to reduce water abstraction and discharge, in line with the principles of circular economy. Water reuse represents the greatest potential for limiting demand to the level of consumption needed, promoting recurrent uses in a circular way. This includes applications such as using water to make concrete or in processes such as cleaning and operation of sanitation facilities.

Some examples of these actions include:

- Reusing wastewater, such as using neutralised drilling water for compaction or dust control.
- Recycling systems for sanitation facilities.
- Using rainwater stored in retention systems.

3.2. Metrics and Targets

3.2.1. E3-3 Targets related to water

The ACS Group rigorously complies with the applicable legal requirements in each of the regions in which it operates. In line with its commitment to the environment and people, and following high sustainability standards, the ACS Group implements targets that go beyond regulatory requirements, reinforcing its contribution to sustainable development and environmental preservation. The following are some of the water-related targets of the Sustainability Master Plan. The targets presented here are defined on a consolidated basis for the entire ACS Group (excluding Thiess and Dornan as neither of them were in the scope of consolidation when the targets were set) and the link in the value chain affected is Own Operations. All the targets in this section are in line with the Environmental Policy established by the ACS Group.

Promoting water consumption reduction initiatives and water recycling/reuse procedures

Baseline value and year	The baseline year is 2019. The target was considered excluding the part of the Industrial Services Division sold in December 2021, and Thiess as "Operationally Equivalent" after 50% of it was sold in December 2020, and without including Dornan as it was not in the consolidation perimeter. Furthermore, the baseline has been updated throughout the life of the Sustainability Master Plan following the best methodologies carried out during the Plan.
Performance	Progress towards this objective is generally assessed by promoting and considering initiatives aimed at reducing water consumption, while encouraging the gradual introduction of water efficiency measures and best water management practices in the course of their activities.

Monitoring the water extracted from water-stressed areas to minimise its share

Baseline value and year	<p>The baseline year is 2019. The target was considered excluding the part of the Industrial Services Division sold in December 2021, and Thiess as "Operationally Equivalent" after 50% of it was sold in December 2020, and without including Dornan as it was not in the consolidation perimeter.</p> <p>Furthermore, the baseline has been updated throughout the life of the Sustainability Master Plan following the best methodologies carried out during the Plan.</p>
Performance	The water abstractions in water-stressed areas are monitored annually.

Establishing a method for calculating the water footprint

Baseline value and year	<p>In 2019 (the baseline year), although the companies calculated and reported water volumes (abstraction, consumption, discharge and reuse) in accordance with their internal protocols and the data were consolidated in the report, there was not yet a common, agreed corporate methodology (standardised scope criteria, definitions, allocation to river basins, quality controls and comparable calculation criteria).</p>
Performance	<p>The ACS Group's Water Task Force was established in 2025, led by the Sustainability Department and comprising expert managers from the Group's main companies. In this context, progress was made during the year on compiling and consolidating an overview of the companies' current position regarding water management objectives, indicators and practices, and in 2025 the ACS Group's Corporate Protocol for Calculating the Water Footprint was drawn up, providing a common methodology for quantifying and consolidating the Group's main water flows (abstraction, consumption, discharge and recycling/reuse), enhancing the traceability and comparability of the information.</p> <p>Ahead of its rollout, the Protocol will be circulated among and reviewed with members of the Water Task Force, and will begin to be implemented in 2026.</p>

3.2.2. E3-4 Water consumption

The information on water consumption and management in the ACS Group is collected by means of two different techniques:

- **Indirect measurement:** When the water consumed comes from external sources, such as the public supply network, the data is obtained from the invoices issued by the supplier.
- **Direct measurement:** In cases where water is abstracted from surface or groundwater sources, quantification is carried out by means of meters installed on the abstraction pumps or on the discharge pumps in the case of groundwater.

With regard to discharges, compliance with the legislation applicable to each respective location is enforced. The ACS Group thus has adequate measurement systems (at the project, company and corporate levels), permitting detailed knowledge of the main sources of consumption. With regard to discharges, compliance with the legislation applicable to each respective location is enforced. In cases where direct or indirect measurement is not possible, certain data can be estimated using proxies based on the type of project. Furthermore, in 2025, the ACS Group drew up its Corporate Protocol for Calculating Water Footprint, which establishes a standardised methodology for the accounting and consolidation of the main reported water statistics (abstraction, consumption, discharge and recycling/reuse), with the aim of enhancing the consistency, quality and comparability of information at Group level.

The Protocol will be circulated to and agreed with the members of the Water Task Force before its operational deployment, and its implementation will begin in 2026.

The same direct metering procedure is applied to quantifying the cubic metres of water reused, recycled or stored, ensuring an accurate and transparent record of water management. If direct measurement is not possible, an estimate is made.

ACS Group Breakdown of water (withdrawal-discharge)

	2024 (1)	2025
Total water withdrawn (m3)	23,865,052	30,884,654
Volume of water withdrawn from surface water (rivers, wetlands, lakes) (m3)	982,347	1,094,760
Volume of water withdrawn from groundwater (m3)	9,869,004	12,505,550
Volume of water withdrawn from third parties (municipal network, processing plant or public or private service) (m3)	5,625,350	6,030,297
Volume of water withdrawn from marine waters (m3)	7,388,351	11,254,047
Total water withdrawn in water stress areas (m3) (2)	8,047,371	7,818,316
Volume of water withdrawn from surface water (rivers, wetlands, lakes) in water stress areas (m3)	569,283	100,641
Volume of water withdrawn from groundwater in water stress areas (m3)	4,567,090	3,976,480
Volume of water withdrawn from third parties (municipal network, processing plant or public or private service) in water stress areas (m3)	2,907,620	3,741,117
Volume of water withdrawn from marine waters in water stress areas (m3)	3,379	78
Total water discharged (m3)	11,009,870	10,514,520
Volume of water discharged into surface water (rivers, wetlands, lakes) (m3)	3,972,549	2,077,530
Volume of water discharged into groundwater (m3)	3,983,170	3,186,041
Volume of water discharged into third-party waters (municipal network, processing plant or public and private services) (m3)	44,442	5,065,555
Volume of water discharged into marine waters (m3)	3,009,709	185,394
Total water discharged in water stress areas (m3) (2)	4,835,331	3,685,551
Consumption (m3)	12,855,182	20,370,135
Ratio: m3 of water consumed/ revenue	308.8	408.6
Consumption in water stress areas (m3)	3,212,040	4,132,765
Consumption in water risk areas (m3)	102,736	873,183

(1) In 2024, Thies's data is included from May 2024 onwards following its transition to full integration, consolidating for 8 months, while in 2025 it consolidates for the full 12 months of the year. In 2025, Dornan is also included following its entry into the consolidation perimeter

(2) In Dragados's Lima Metro project (Peru), 3,130,954.66 m³ and 2,253,473.73 m³ of groundwater table water emerged in 2024 and 2025 respectively during excavation works. Practically all of it (3,121,710.91 m³ in 2024 and 2,115,316.78 m³ in 2025) has been returned to it in similar or better conditions.

ACS Group water withdrawn/discharged excluding Thies and Dornan

	2024 (1)	2025
Total water withdrawn (m3)	13,142,420	14,195,330
Total water discharged (m3)	10,984,936	10,505,748
Water consumption (m3) (Excluding Thies and Dornan)	2,157,485	3,689,583

(1) The year-on-year variation is explained primarily by business dynamics (opening/closing of projects and execution phase) and, additionally, by methodological improvements incorporated in 2025 in FlatironDragados, whose retrospective application to 2024 has not been possible in all cases.

Water recycled and reused (m3)

	2024	2025
Total water recycled and reused (m3)	2,261,766	2,086,986