

11. ESRs G-1 Business Conduct

The ACS Group's business conduct is based on the corporate values established in its Code of Conduct, which have been defined around the values of integrity, excellence, trust, sustainability and profitability, thus guaranteeing the creation of sustainable value for its shareholders and, in turn, the generation of shared value with its various stakeholders. The ACS Group also extends these values to the third parties with whom it maintains commercial or business relations through its value chain, considering in this respect their level of commitment to the Group's business conduct culture.

In particular, integrity implies that all ACS Group employees must comply with the legislation in force in the countries where the Group operates, in addition to exercising ethical behaviour that generates confidence in the communities and markets in which the Group operates by demanding the highest standards of integrity among its employees and also from third parties with which the Group is linked.

It is in this context of integrity and consequent commitment to compliance with the laws of the various jurisdictions in which the Group is present that the establishment of a compliance strategy by ACS's Board, based on ACS Code of Conduct and developed in ACS's General Compliance Policy and other corporate policies and rules that complement it, acquires its full significance and relevance.

The compliance management model is in turn based on defining the corporate structure of the group of companies of which ACS is the parent company, based, as established in the Corporate Governance Policy, on a decentralised management model, in which ACS, as the Group's parent company, assumes the duties of strategic definition and establishment of the basic management guidelines at Group level through the relevant corporate policies and rules, without prejudice to the ordinary and effective management of the businesses by the various companies comprising the Group, thus guaranteeing an appropriate level of coordination and internal control.

A medium-level compliance management model has thus been implemented that, while respecting the Group's decentralised management model, is based on the following principles:

- Developing and implementing a homogeneous system of standards for the subsidiaries with the target of having all the Group's subsidiaries have a certified compliance management system or, at least, one that can be considered certifiable, together with half-yearly monitoring to detect cases in which non-compliance or infringements have been reported or the materialisation or realisation of compliance risks was ascertained.
- Horizontal governance of the compliance function in the parent company, the success of which is based on the presence of the various supervisory functions in the governance and compliance body that exist within the organisation below the audit and sustainability committee (consolidation, compliance, risk and internal audit), which in turn exercise control over compliance risk over the substantive functions, also present in this body (sustainability, cybersecurity, artificial intelligence, privacy and taxation). Thus, the Governance and Compliance Committee exercises greater and more efficient control over risks of this nature, carrying out its duties under the supervision of the Audit and Sustainability Committee or, where appropriate, of ACS's Board.

11.1. Governance

11.1.1. ESRs-2 GOV-1 The role of the administrative, supervisory and management bodies

Regarding the role of the administrative, management and supervisory bodies, this information is included in section the ESRs 2 (GOV 1, GOV-2, GOV-3 and GOV-4) section of this report.

Those sections address disclosure issues related to:

- The role of the administrative, management and supervisory bodies.

- Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies.
- Integration of sustainability-related performance in incentive schemes.
- Statement on due diligence.

11.2. Impact, risk and opportunity management

11.2.1. *ESRS-2 IRO-1 Description of the processes to identify and assess material Impacts, Risks and Opportunities*

The IROs related to governance have been identified in accordance with the Double Materiality analysis. In addition, the sites and activities of the ACS Group and its value chain have been analysed, also taking into account its stakeholders, in particular the groups affected. For more information, see the chapter on ESRS 2 General Information, section IRO - 1.

11.2.2. *G1-1 Corporate culture and business conduct policies and corporate culture*

The ACS Group has a series of mechanisms in place to detect, report and investigate issues related to unlawful behaviour and behaviour contrary to the code of conduct and other internal rules. These mechanisms include the Global Compliance Management System, the Dual Risk Management Model, the internal compliance regulations and anti-bribery regulations, and the establishment of the Whistleblowing Channel. In turn, the positions with the greatest risk or exposure in relation to the criminal risks of corruption between private individuals and bribery are analysed and identified, from a preventive perspective, in the document on "Personnel especially exposed to criminal risk in ACS's parent company". Specifically, and in relation to the various criminal offences, the members of the governing and management bodies are identified, at their various levels and areas, who may be affected by these risks and, therefore, where preventive and control measures are applicable to prevent the risks from materialising.

The Global Compliance Management System

In April 2021, the international standard ISO 37301 on Compliance Management Systems was published, followed in September of that year by the ISO 37000 standard on Governance of organisations. Bearing the content of both these standards in mind, in December 2021 ACS's Board of Directors approved its Corporate Governance Policy (updated in December 2024) in which reference was already made to the organisation's Global Compliance Management System, which aims to implement a model that respects the Group's highly decentralised management structure, allows the Audit and Sustainability Committee of the Spanish listed parent company's Board to monitor and assess the effectiveness of the non-financial risk management systems related to the Company and the Group, as well as compliance with the duties of diligence of the parent with regard to subsidiaries, through a system of double risk control in the various compliance areas. The Global Compliance Management System extends its scope to criminal compliance and anti-bribery; market abuse; competition law; privacy and data protection, artificial intelligence and cybersecurity, sustainability, environmental and human rights due diligence and taxation, among others, and, in general, any other area of compliance that the Board considers should be covered by the Global Compliance Management System from time to time.

The main elements of the Global Compliance Management System are detailed in the General Compliance Policy.

Like all other Group policies and procedures, this policy is available to all stakeholders and Business Partners on the corporate website www.grupoacs.com.

The purpose of the Global Compliance Management System is therefore to structure an environment of prevention, detection and early management of risks in the various areas of Compliance, and to reduce their undesired effects if they materialise, to help foster a culture of compliance throughout the organisation in

the areas applicable to them. With the scope of the Global Compliance Management System defined, its main elements are: the General Compliance Policy, the Compliance Function, the risk and control matrices in the various compliance areas, the ACS Whistleblowing Channel (internal reporting system) and the Disciplinary System.



General Compliance Policy

Updating the Global Compliance Management System Policies

The Group's main compliance policies and procedures are available to all stakeholders and Business Partners on the corporate website: www.grupoacs.com. These policies establish the basic principles of action in relation to the impacts, risks and opportunities detected in various regulatory areas and, in turn, serve as reference standards in the promotion and encouragement of business conduct in accordance with the values and reputation of the ACS Group's corporate Compliance culture.

Thus, from a governance perspective, in November 2024 the Board approved an amendment to the Rules of Procedure of the Compliance Committee, which was renamed the "Rules of Procedure of the Governance and Compliance Committee", with the aim of also giving the Committee the duty of providing governance advisory and support for coordination purposes when necessary, and adding the Director of Artificial Intelligence and Cybersecurity, the Director of Sustainability and the Data Protection Officer as new members of the Committee.

A continuous process of interacting between organisational elements is thus defined to establish Policies, targets and Processes so that it can efficiently and sustainably comply with its obligations in the long term, generating evidence of the organisation's commitment to compliance and taking into account the needs and expectations of all its stakeholders.

The Dual Risk Control Model: duty of care of the parent company towards subsidiaries

To promote the adoption of their own compliance management model by subsidiaries, which can be understood as robust, ACS Group's parent implements a double control system:

- Implementation and development of a homogeneous standards system for subsidiaries that aims to ensure that all Group subsidiaries have a certified compliance management system or, at least, one that can be understood as certifiable. This system will make it possible to detect those subsidiaries that have deficiencies and that do not reach the minimum level of homogeneity of the group. This will include a risk control system represented by the subsidiaries as a whole that, in turn, will make it possible to detect where there is greater vulnerability to indirect risks from subsidiaries.
- Half-yearly monitoring to detect cases where breaches or infringements have been reported or compliance risks have materialised or been realised, while also monitoring whether the subsidiary has adequately reacted in that specific case by detecting systemic deficiencies, taking corrective actions and the steps taken to resolve them (internal investigations and their results, modification of rules, improvement of controls, etc.).

In accordance with the ACS Group's decentralised management model, the Group's parent company promotes the adoption of its own specific compliance management model by each of the subsidiaries, although aligned with common regulatory standards and Policies. In this sense, the use of a tool such as the Global Compliance Report among the Group's companies to assess the risks that each of their independent compliance management systems represent for the parent company should be understood. The parent company thus has, at least, a mechanism for reporting and understanding the risks to which it is exposed so that its directors can comply with their general duty of oversight and proper care.

With this information, it can operate with the indirect risks arising from the subsidiaries, implementing and developing a second line of internal control, in addition to the specific systems of the subsidiaries. This allows medium-intensity control without daily involvement in the compliance management of the subsidiary that is based on a system of reports from the subsidiary to the Parent. The homogeneous reporting system at group level provides the basis for the existence of due control by the parent company over the subsidiaries, promoting the adoption of their own compliance management systems by the subsidiaries, without prejudice to the supervision and control function that corresponds to the parent company. For these purposes, a tool is available, designed in 2019, which has been subject to constant correction and improvement, called the Global Compliance Report which, in its latest version of December 2024, comprises the following sections: I. Criminal compliance and anti-bribery obligations; II. Compliance personnel and responsibilities; III. Business Partners. External care and risk assessment; IV. Compliance training and communication; V. Controls, targets and resources; VI. Audit and monitoring; VII. Whistleblowing channel; VIII. Internal investigation procedure; IX. Disciplinary regime; X. Breaches, analyses and corrective actions; XI. Competition; XII. Cybersecurity; XIII. Environmental due diligence; XIV. Due Diligence in Human Rights; XV. Tax compliance; XVI. Corporate Governance

The Global Compliance Report, which is sent by the Group's subsidiaries every six months, is supplemented by the ACS Group's risk and criminal and anti-bribery matrix, which includes both the risks to which the individual listed company is exposed due to its own activity and the risk to which it is indirectly exposed through the criminal risks of the activities of its subsidiaries. In addition to this criminal compliance and anti-bribery risk and control matrix for the Group's parent company, a tax compliance risk and control matrix and an IT and cybersecurity risk matrix were added.

The Global Compliance Report also allows for an annual risk score card in all reported compliance areas.

It should also be noted that the Audit and Sustainability Committee receives regular information from the Director of Compliance and Corporate Governance to adequately monitor the annual Compliance targets, to stay permanently informed of new regulatory developments and best practices in this area, and to be informed as soon as possible of any incidents that may have occurred in the area of integrity and regulatory compliance. In this respect, the Audit and Sustainability Committee carries out the following actions, among others:

- Supervision of the Annual Compliance Tracking Report.
- Tracking the fulfilment of compliance targets and the main compliance risks.
- Monitoring the main compliance risks that the Group is exposed to, as well as the main initiatives and training actions in compliance matters.
- Monitoring the activity of the Whistleblowing Channel

Internal compliance regulations

In addition to updating the various sustainability policies referred to in the previous chapters of this report, in December 2024 the Board overhauled several of the Company's compliance rules, including:

General compliance, market abuse, competition

- The Code of Conduct, adding sustainability and information security (AI and cybersecurity) criteria and aligning its content with Directive (EU) 2024/1760 on sustainability due diligence, and Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence.
- The General Compliance Policy, including, among other aspects, the new risks arising from the NIS2 Directive (2022/2555) on cybersecurity and the Artificial Intelligence Regulation (EU) 2024/1689, while also reviewing specific aspects of the Criminal and Anti-Bribery Compliance Policy, Compliance with International Sanctions, Gifts and Hospitality, Relations with Public Officials and

Equivalents and the Whistleblower Protection Policy (Whistleblowing Channel), in addition to those mentioned below.

- The structural document regulating the Global Compliance Management System.
- The Occupational Health and Safety Policy.
- The Conflict of Interest Management Policy, complementing the internal regulatory framework on compliance.
- The Rules of Conduct for the Securities Markets (RIC), simplifying their subjective scope of application, in line with Regulation (EU) 596/2014 on market abuse and the Spanish Securities Market and Investment Services Act 2023 [Ley de Mercado de Valores y Servicios de Inversión]. The Treasury Stock Policy has also been updated in line with the Securities Markets and Investment Services Act 2023.
- The Competition Compliance Policy and Protocol, incorporating basic principles on controls over mergers and state aid, taking into account the Guidelines and Protocols of action of the competition regulatory authorities.
- The Compliance Obligation Identification and Impact Assessment Procedure.
- The Risk Management and Control Policy.
- The Rules of Procedure of the Governance and Compliance Committee.



Compliance policies and procedures in the ACS Group

Progress and milestones for improvement in the area of compliance and competition

All the updates of to the above corporate policies have been carried out in line with the ISO and UNE certifications and the various relevant ratings in the areas stated above. Information in this regard can be found in the Compliance Committee's Transparency Report as well as on the Group's website.



Annual Compliance Activities Transparency Report



Certificates in the field of Compliance

Established communication and complaints channels

Communication and/or whistleblowing channels are presented as tools that allow organisations to channel communications, as well as queries or complaints related to suspected irregularities, which are often only known to certain employees of the organisation itself or to outsiders. In this way, these channels enable organisations, as the entity closest to the reported events, to be aware of them, investigate them and respond proactively.

The ACS Group is aware of this reality and of the importance of providing the appropriate tools to the members of its environment to report any infringement in a safe and trustworthy environment for whistleblowers.

ACS's Whistleblowing Channel is in line with the Spanish Whistleblower Protection Act 2/2023 of 20 February [*Ley de Protección al Informante*], which transposed Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law. In the context of ACS' culture of compliance, an ever-present target is to remain aligned with the best practices in each area. Therefore, the regulation of ACS's Whistleblowing Channel is also aligned with the ISO 37002:2021 international standard on Whistleblowing Management Systems, as are most of

the ACS Group companies, based on the principles of trust, impartiality and protection, with a broader protection regime than the laws cited above, bringing ACS's practices closer to the highest expectations of society in general, and of its stakeholders in particular.

ACS's Ethical Channel, referred to in the ACS Group's Code of Conduct, is specifically regulated by the following rules: (i) the ACS Policy of Operation of Ethical Channel; and (ii) the Procedure for handling reports received in the ACS Ethical Channel.



With regard to managing the Channel, the ACS Governance and Compliance Committee has been appointed by the Board to be in charge of the Whistleblowing System, and the Compliance Director has been appointed to be the individual representative before the Independent Whistleblower Protection Authority.

ACS enables all members of its organisation or those who suspect or know of violations related to ACS to use this or other internal reporting channels to bring their concerns to ACS's attention. Furthermore, ACS always informs any potential whistleblowers that there are also external channels for reporting to the competent authorities and, where appropriate, to the institutions, bodies or agencies of the European Union, citing, for this purpose, the access information in its own Whistleblowing Channel Operating Policy.

As established in the Operating Policy for its Whistleblowing Channel, ACS urges directors, executives and employees who maintain links with Group companies - regardless of the legal nature of their relationship - and those who are not employees but become aware of the existence of any infringement in their professional relationship with ACS, to report it to the Organisation.

The Procedure for managing reports received through the ACS Whistleblowing Channel develops the content of the Operating Policy of the ACS Whistleblowing Channel, ratifying ACS's firm will to guarantee conduct that adheres to both its rules and its ethical standards, establishing the necessary mechanisms to carry out the internal processing of any reports received. In this regard, ACS considers that having various internal channels available broadens the range of possible reports in terms of subject matter or seriousness, and that they need to be classified internally to manage them best, taking into consideration the parameters of (i) urgency; (ii) the persons involved; or (iii) the entity affected. These criteria help to identify and deal appropriately with the type of reports received, as set out in greater detail in the ACS Whistleblower Report Management Procedure.

In terms of processing reports, ACS is aligned with the international standard ISO 37002:2021, dividing the procedure for managing and investigating the reports received into four (4) phases: (i) Receipt of reports of wrongdoing; (ii) Assessment of reports of wrongdoing (triage); (iii) Handling of reports of wrongdoing; and (iv) Resolution of the cases.

All stages of ACS's investigation procedure must comply with the following principles and safeguards: (i) Principle of trust and confidentiality; (ii) Principle of objectivity; (iii) Principle of impartiality and presumption of innocence; (iv) Principle of compliance with applicable law and sufficiency of means; (v) Principle of proportionality and subsidiarity; and (vi) Protection of bona fide whistleblowers.

The ACS Whistleblowing Channel allows complaints to be made anonymously. Through the digital platform of the Whistleblowing Channel, whistleblowers can stay in contact with the organisation, keeping their anonymity and tracking the case. ACS also allows whistleblowers to designate a preferred means of communication to receive information on the status of their report or to contact the whistleblower for further information and/or clarification. For both anonymous and non-anonymous reports, ACS guarantees

confidentiality and that there will be no reprisals and/or prejudicial conduct against the whistleblower, offering the necessary protection and support from the moment the report is filed when appropriate.

ACS relies on an external technology provider, Whistleblower Software, to receive whistleblower reports. Through this provider, a preliminary analysis is carried out to prevent conflicts of interest if a member of the Governance and Compliance Committee is involved. Likewise, all the reports that are received can be traced and monitored for their appropriate treatment in their management and custody.

The ACS Group also processes personal data to process and investigate reports submitted through the Whistleblowing Channel in accordance with current legislation. Whistleblowers can assert their data protection rights at Avda. Pío XII, 102, 28036, Madrid, Spain or by email at pdd@grupoacs.com. More detailed information on the processing of your data is available in the data protection section of the website as well as directly in the information regarding the users of the Whistleblowing Channel.

Changes to the ACS Group's Ethical Channel:

- Through the Group's website - Whistleblowing Channel - Compliance - ACS Group-in a separate, easily identifiable section, accessible to all members of the ACS Group, as well as to all the Group's interlocutors and interested parties.
- By post to:

Canal Ético Grupo ACS
Avda. Pío XII 102, 28036 Madrid, Spain.

Verbal and/or face-to-face communication:

ACS members are also able to submit queries, concerns or complaints through the following means: (i) To a direct superior or a member of ACS management; (ii) to a member of the Governance and Compliance Committee; and (iii) to the Compliance Department. Whistleblowers can also request a face-to-face meeting with the Compliance Committee, or any of its members, within seven (7) days of when they requested the meeting.

Finally, in 2024, four (4) reports were received through the ACS Whistleblowing Channel, three (3) of which were forwarded to the corresponding ACS Divisions as established in the ACS Whistleblowing Channel Operating Policy. These reports had no significant impact on the year.

Business conduct training

In 2024, ACS continued to carry out its Compliance training programme with the aim of consolidating its culture in all its divisions. In this context, the Governance and Compliance Committee monitored the main training courses and lectures given during the year.

The training strategy is based on the document that forms the backbone of the Global Compliance System, in which training is considered a key factor in generating and maintaining a culture of ethics and respect for the law that permeates the organisation. This strategy has also been aligned with the Training Matrix approved by the Governance and Compliance Committee, which establishes the need for structured and segmented training according to the various organisational levels.

The training activities consisted of a combination of online sessions, face-to-face presentations and in-house training provided by experts, ensuring an optimal scope in the transmission of knowledge on regulatory compliance and best practices in the field.

In this regard, on 17 July 2024, ACS launched a new online training platform, where new training modules on Compliance and cybersecurity have been published.

The following courses were provided in 2024 for all employees:

- Implementation of the Tax Compliance management model, in video format.
- Criminal and Anti-bribery Compliance at ACS - Advanced course on UNE 19601 and ISO 37001, on two real case studies with the intervention of the entire organisation, including those in charge of the controls.
- Video given to identify, classify and visualise the different Compliance activities carried out by the various functional areas of the ACS Group's parent company and that translate into responsibilities and obligations for which some of the members of the organisation are responsible.
- Individual and face-to-face workshops on the risks associated with each of the controls identified in the Matrix of criminal and anti-bribery risks and controls.
- Training for all users before the implementation of Workiva.
- Introduction to Compliance, a face-to-face session given by the Governance and Compliance Committee, through the Director of Compliance and Corporate Governance and the Director of Internal Audit to all new employees of the Organisation.

All these training modules have been disseminated to all the employees via the corporate intranet and sent to the members of the Board.

11.2.3. G1-2 Management of relationships with suppliers

Supply chain management is one of the main material issues for the ACS Group. The Group's commitment to its supply chain is key to ensuring a responsible model, in which the quality of its services and products involves compliance with high standards of action and the promotion of sustainable practices.

The model relationship with suppliers, contractors and business partners established by the ACS Group seeks to ensure a responsible, equitable and ethical process that is adapted to each company's operational needs. The integration of environmental, social and good governance aspects (ESG) into the management of its supply chain forms part of the responsibility of the ACS Group and its commitment to sustainable development.

In this regard, the Board of Directors of the ACS Group approved the Code of Conduct for Business Partners, updated in latest version on 19 December 2024, which outlines the basic principles that must govern the relationship between the Business Partners and the ACS Group.



Code of Conduct for Business Partners

In addition to this Code of Conduct for Business Partners, in 2024 the ACS Group approved its Sustainable Procurement Policy, which establishes ACS's basic principles of action and guidelines for behaviour, applicable to the entire Group, in the processes of purchasing goods and services necessary to carry out its activities, to promote best practices in sustainability throughout the value chain. In addition, the Sustainable Procurement Policy establishes measures to avoid delays in payments to suppliers, complying with the payment deadlines under the applicable legislation, and to resolve disputes or claims related to payments.

The ACS Group has a decentralised structure and carries out its activity through an extensive group of companies that share ACS's culture and values, while at the same time each one manages its own procurement with its own independent management systems, always based on the common principles and targets defined in this Policy, which include:

- Mapping the supply chain, and identifying where the material impacts, risks and opportunities arise from a sustainability perspective.
- Adopting appropriate due diligence measures to identify, assess, prioritise, prevent, mitigate and, where appropriate, remedy actual or potential adverse human rights and environmental impacts.
- Ensuring that the approval processes and supplier information collection and management systems address any sustainability issues that are material to the organisation.
- Continuously reviewing and, where appropriate, updating and improving procurement and sourcing processes to ensure their alignment with the principles set out in the Code of Conduct for Business Partners, and make best efforts to avoid potential adverse sustainability impacts.
- Engaging with suppliers that meet ACS sustainability standards, and excluding those that are considered to have a high likelihood of causing serious adverse human rights or environmental impacts.
- Gathering information on material IROs to be able to report it to third parties and Group entities so that they, in turn, can meet their transparency of information commitments.
- Informing major suppliers and contractors about the Organisation's sustainability commitments.
- Prioritising, where conditions are comparable and equivalent circumstances are present, procurement from significant suppliers and contractors that are able to demonstrate they meet concrete decarbonisation targets and sustainability targets in general. Thus, priority will be given to signing contracts with significant suppliers that have the best performance in terms of sustainability, applying a given weight to sustainability standards in the supplier selection and approval process that each ACS company will define based on its internal operations.
- Systematically evaluating major suppliers and, if sustainability deficiencies are observed or the suppliers are not aligned with the internal minimum principles established by the Organisation, corrective measures will be agreed with them to address these deficiencies within a set period of time. If these are not remedied, the Organisation will consider suspending or terminating the business relationship, after considering the negative impacts that could result.
- Recurrently assessing suppliers' sustainability performance in relation to topics such as health and safety, respect for human rights and environmental protection (decarbonisation, pollution, biodiversity, water resources, circular economy). Suppliers with low or moderate but manageable sustainability risks are treated with intensified attention.
- Establishing training and awareness-raising programmes for major suppliers to enhance their sustainability performance, including, where possible, providing them access to benchmarks for sustainability practices.



Sustainable Procurement Policy

In connection with the Basic Business Principles referred to above and to ensure their effectiveness and to adopt appropriate due diligence measures, appropriate measures are adopted in the framework of the purchasing and procurement processes, including:

Certification

The responsible management model for the Value Chain begins with a process of approval of major suppliers, assessing their compliance with the fundamental criteria established by ACS and the companies forming part of its Group to form part of its supply chains, through external evaluation platforms, questionnaires and computer platforms

This consolidation does not just consider economic and technical aspects, but also various aspects related to sustainability, such as environmental and quality certifications or adherence to international human rights standards, so that the suitability of major suppliers can be assessed to align them with the targets and principles of this Policy and facilitate the identification, prevention and management of potential impacts related to the Supply Chain. The weight of ESG factors in the approval process varies according to companies' activities and areas of action, but the average weighted weight of these factors exceeded 36.1% in 2024, with the performance and evolution of ESG indicators being one of the factors to be considered in the approval and selection process. Specific aspects assessed include certificates on environmental aspects (ISO14001, EMAS or the like), certification on quality aspects (ISO 9001 and the like), adherence to international human rights and labour rights standards and analysis of the labour standards and practices of suppliers and subcontractors, among others. In 2024, 69.4% the suppliers that the Group worked with adhered to the ethical, social and environmental commitment standards or have certificates in this area.

Analysis

The ACS Group's companies carry out analyses to identify significant suppliers in their supply chains, considering both economic/technical aspects and major suppliers in terms of ESG.

To determine significant sustainability suppliers, a preliminary analysis is carried out on the suppliers identified as potentially high risk due to:

- **Country-specific risk:** risk of negative environmental, social and governance impacts related to a country's political, social, economic, environmental or regulatory situation.
- **Sector-specific risk:** risk of negative environmental, social and governance impacts related to the distinctive characteristics of a sector in terms of employment status, energy consumption, resource intensity, emissions or pollution potential.
- **Commodity/commodity-specific risk:** risk of negative environmental, social and governance impacts related to a commodity's supply chain structure, labour situation, land use and resource intensity, energy consumption, emissions, material toxicity or pollution potential.

Within these suppliers, those that may have substantial risks of impacts on some of these aspects are identified:

- **Environmental aspects:** the risk of negative impacts related to environmental issues, including but not limited to greenhouse gas emissions, energy consumption, water consumption, resource efficiency, pollution, waste or biodiversity.
- **Social aspects:** risk of negative impacts related to social issues, including but not limited to human rights and labour rights, such as child labour, forced labour, discrimination, freedom of association, the right to collective bargaining, working hours, remuneration, occupational health and safety, or the rights of local communities.
- **Governance aspects:** the risk of negative impacts related to governance issues, including but not limited to corruption, bribery, conflicts of interest or anti-competitive practices.

As a result of these processes, the main data on the analysis of the significant suppliers (critical in technical and economic terms, most significant in terms of ESG) showed that there were 6,662 major suppliers in 2024.

Major suppliers may be occasionally subject to random audits by internal auditors or independent third parties, to ensure they are in compliance with the contractual commitments taken on by suppliers and providers, identifying possible breaches and implementing, where appropriate, corrective or management measures adapted to the circumstances of the specific case which, ultimately, may lead to the immediate termination of the contractual relationship.

Given the importance of analysing the supply chain for managing risks for the company, the ACS Group companies identify their direct critical suppliers (tier-1 critical suppliers). The ACS Group evaluated 5,609 significant tier-1 suppliers in terms of sustainability in 2024, which represents 84.2% of the total of 81,573 active suppliers that the Group worked with in 2024. These significant suppliers account for 61.8% of the total procurement expenditure in 2024. Of these significant tier-1 suppliers assessed, 2.6% of them were identified as at risk in terms of sustainability, which may entail lacking certificates or having breaches or other risks detected. For suppliers at sustainability risk, as specified in the Sustainable Procurement Policy, if sustainability deficiencies are observed or the suppliers are not aligned with the established internal minimum principles, corrective measures will be agreed with them to address these deficiencies within a set period of time. If these are not remedied, the Organisation will consider suspending or terminating the business relationship, after considering the adverse impacts that could result.

Thus, depending on the risks detected, the reasons for the negative assessment are analysed and initiatives and remediation plans are proposed to strengthen the identified areas of improvement that include, among other things, training and collaboration activities. Serious breaches can lead to the immediate termination of contracts or agreements relating to suppliers.

By 2024, 85.6% of significant tier-1 suppliers had been evaluated throughout their relationship with the Group.

Supply chains

For major suppliers, analyses are carried out to identify them in the supply chains and, where appropriate, initiatives and remediation plans are put forward to enhance the identified areas for improvement, including, among others, training and collaboration activities. Likewise, the Group companies have begun to extend the scope of this analysis of the Group's supply chain, reaching the significant suppliers of the direct suppliers (tier-2 major suppliers), and the tier-2 suppliers that may have sustainability risks. The number of these suppliers identified in 2024 was 96,444 significant suppliers with regard to ESG.

11.2.1. G1-3 Prevention and detection of corruption and bribery

In the specific area of criminal and anti-bribery compliance, the Code of Conduct, the General Compliance Policy and the Code of Conduct for Business Partners are supplemented by the Criminal and Anti-Bribery Compliance Policy, the Policy on Compliance with International Sanctions imposed on third parties, the Policy on Gifts and Hospitality as well as the Policy on Relations with Public Officials and Equivalents, revised by the Board on 19 December 2024, to incorporate certain principles relating primarily to regulatory developments in the areas of sustainability, data, information security, cybersecurity and artificial intelligence.

This entire set of regulations is aligned with national standard UNE 19601:2017 on criminal compliance management systems, and international standard ISO 37001:2021 on anti-bribery management systems.

 **Criminal Compliance and Anti-Bribery Policy**

 **AENOR certificates at www.grupoacs.com**

In addition, the specific risk matrices for criminal compliance and anti-bribery risks and controls were updated and reassessed in 2024.

ACS's Criminal and Anti-Bribery Compliance Policy provides for a specific mechanism for reporting conduct and incidents that may involve a risk of corruption and bribery, specifically through ACS's Whistleblowing Channel. Reports received through the Whistleblowing Channel will be handled in accordance with ACS's Whistleblowing Channel Operating Policy and the specific Procedure for managing reports received through the Whistleblowing Channel.

Under the internal regulations governing the operation of the ACS Whistleblowing Channel, during the report processing and investigation phase, conflicts of interest must be avoided, among other rules, to ensure the investigation is conducted independently from those involved or implicated in the report of the incident or, the case being, the breach. These regulations stipulate that reports will be processed and investigated at the direction of the Compliance Committee, in accordance with criteria of impartiality, specialisation and knowledge of the matter, without prejudice to the participation, where appropriate, of a third party expert in the investigation, provided that this is considered relevant and there are no conflicts of interest.

The Procedure for managing reports received through the ACS Whistleblowing Channel calls, depending on the types and classifications of the reports, for the investigation report and the conclusions on it to be submitted to Senior Management or, where appropriate, depending on the type of report, to the Board, for its assessment and proposed action.

The Governance and Compliance Committee is responsible for autonomously promoting the implementation of the various measures that make up ACS's criminal and anti-bribery Compliance Management System and, therefore, for adopting the dissemination the measures deemed appropriate.

ACS's Criminal and Anti-Bribery Compliance Policy, like its other corporate policies, is available to all Members of the Organisation on the corporate intranet, as well as to all relevant groups through its public dissemination on the corporate website www.grupoacs.com. In addition, in the cases provided for by these internal regulations, ACS's business partners must confirm that they understand and even expressly assent to the values of the Criminal and Anti-Bribery Compliance Policy.

Training

Compliance training is a key factor in fostering and maintaining a culture of ethics and respect for the law that permeates the Organisation.

The Governance and Compliance Committee is responsible for promoting scheduled training cycles on Compliance in each of the various compliance areas defined for the members of the Organisation, ensuring that those who, due to their position or because they carry out an activity in the Organisation that is exposed to Compliance Risks rated higher than low in their assessment, receive adequate training to help them prevent, detect and manage these risks appropriately.

In this sense, and since the training needs may vary depending on the occupations and professional categories of the members of the Organisation, differentiated contents are defined for those who are subject to special Compliance obligations, leaving a documentary record of (i) the materials used; (ii) the people who took the courses; (iii) the qualifications obtained; (iv) the attendance and/or achievement certificates provided to each attendee/participant in the training; and (v) the minutes signed by those responsible for providing the training (for face-to-face training).

Annually, the Governance and Compliance Committee will approve the training matrix covering the various areas of Compliance. That matrix reflects the common training structure for all Members of the Organisation as well as the allocation of specific modules to Members of the Organisation who, due to their activity or position in the Organisation, are exposed to specific Compliance Risks. The Governance and Compliance Committee will be responsible for keeping this matrix up to date, taking into account the periodic Compliance Risk Assessments, the personnel in particularly exposed positions and the Compliance targets of the Organisation.

In addition to the scheduled training, ACS will offer ad hoc courses to members of the Organisation who are affected by any internal changes (e.g., promotion or change of department, incorporation of new lines of

business or other operational/structural changes) or external changes (e.g., changes in legislation), or in the event of any breaches of the Global Compliance Management System that trigger the need for additional training actions.

Specifically, this training was aimed at, among other areas, knowledge of the requirements of the UNE 19601 (criminal compliance) and UNE-ISO 37001 (Anti-bribery) standards, through an advanced course which, including the completion of two real case studies, was aimed at those in charge of the controls.

In addition to the compliance training courses, the Governance and Compliance Committee will promote activities aimed at raising Compliance awareness among the Organisation's members, as well as, to the extent possible due to the nature of the business relationship, among the business partners.

Likewise, the Governance and Compliance Committee will be responsible for promoting communication activities to publicise, in a general or selective manner, aspects related to compliance (new obligations, changes in procedures, appointments, etc.). These communications may be both internal and external and, in any case, will use the appropriate communication channel, language and idiom to ensure that their messages are fully understood by their recipients.

100% of employees with responsibility for compliance, including those in positions at risk of corruption and bribery, are covered by training programmes.

In 2024, ACS reinforced its Compliance training programme with the aim of consolidating its culture in all its divisions on key current topics such as sustainability, cybersecurity and governance, prepared with the collaboration of independent external experts.

The training strategy has been aligned with the Training Matrices unanimously approved by the Governance and Compliance Committee on 16 April 2024, which establish the need for structured and segmented training according to the various organisational levels. The milestones that bear mention in these matrices include: (i) Training matrix for the Full Board in person and on video; (ii) Training matrix on the criminal and anti-bribery compliance system; (iii) Training matrix on information security; (iv) Training matrix on corporate due diligence in sustainability; (v) Training matrix on compliance culture in the organisation; (vi) Training matrix on the Whistleblower Protection Act 2/2023, of 20 February, in the context of the new whistleblowing channel management platform; (vii) Training matrix on the tax compliance management system; (viii) Training matrix on Workiva; (ix) Training matrix for new hires in the organisation.

As a result of these specialised training matrices for the various groups, the training activities consisted of a combination of online sessions, in-person presentations and internal training given by experts on key current topics in compliance such as sustainability, cybersecurity and governance, prepared with the collaboration of independent external experts.

11.3. Metrics and Targets

11.3.1. G1-4 Confirmed incidents of corruption and bribery

In 2024, no relevant non-conformities or breaches were identified in the area of compliance and, therefore, also in the area of corruption and bribery; therefore, there are no cases in this area.

11.3.2. G1-5 Political influence and lobbying activities

The ACS Group is committed to the fight against bribery and, as stated in its Code of Conduct, ACS Group companies must avoid any transaction that could be interpreted as a donation to political parties or individual politicians, whether in cash or in kind. Donations or sponsorships to entities that appear not related to political parties or public officials must be prevented from fundamentally violating this Code of Conduct.

In 2024, the ACS Group did not make any financial or in-kind contributions to political parties, as stipulated in its Group Code of Conduct.

11.3.3. G1-6 Payment practices

Since the ACS Group operates in various legal jurisdictions and in various business segments, there are no standard payment terms across the ACS Group. However, as reflected in the commitments of the Sustainable Procurement Policy, with regard to payments to suppliers, regardless of the type of supplier, the payment deadlines established in the applicable legislation will be complied with as applicable in each country.

In addition, in 2024, the Group has made a global calculation of the average time that ACS Group companies take to pay their invoices. Thus, on a consolidated level, the Group takes an average of 23 days to pay an invoice from the date on which the contractual or statutory payment period starts to be calculated. This total figure reflects the number of days each Group company takes to pay, weighted by the companies' respective shares of Group sales. The figure for CIMIC and Turner is based on an extrapolation using representative sampling. The average payment period in Spain can be consulted in the ACS Group's Consolidated Annual Financial Statements.

By region and using the same calculation criteria as described above, the average payment period in North America is 17 days, in Asia Pacific it is 35 days and in Europe it is 32 days.

As at 31 December 2024, there are no legal proceedings pending for late payments.