



ENVIRONMENTAL POLICY

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CONTENTS

| | | |
|------------|--|-----------|
| 1. | <i>INTRODUCTION</i> | 2 |
| 2. | <i>DEFINITIONS</i> | 2 |
| 3. | <i>SCOPE OF APPLICATION</i> | 4 |
| 4. | <i>PRINCIPLES AND COMMITMENTS TO THE ENVIRONMENT</i> | 5 |
| 5. | <i>MAIN AREAS OF ACTION</i> | 6 |
| 6. | <i>POLICY IMPLEMENTATION</i> | 10 |
| 7. | <i>GOVERNANCE</i> | 12 |
| 8. | <i>WHISTLE-BLOWING AND COMPLAINTS CHANNELS</i> | 12 |
| 9. | <i>APPROVAL, DISSEMINATION, ENTRY INTO FORCE AND VALIDITY</i> | 12 |
| 10. | <i>ADDITIONAL CONSIDERATIONS</i> | 12 |

1. INTRODUCTION

This Environmental Policy responds to the commitment of ACS Actividades de Construcción y Servicios, S.A. (hereinafter "**ACS**" or the "**Organization**"), which projects onto the companies of the group of companies of which ACS is the parent company (hereinafter the "**ACS Group**" or the "**Group**") to protect the environment and to ensure the proper management of legitimate expectations regarding those groups that may affect or be affected by the ACS Group's activities (hereinafter the "**Stakeholders**"), in accordance with the strategic lines defined in the Code of Conduct and the General Sustainability Policy.

ACS's sustainability strategy is focused on decarbonising our operations, expanding our work in sustainable infrastructure, the energy transition and acting responsibly to support our employees and the communities in which we operate.

By means of this Environmental Policy (hereinafter the "**Policy**"), ACS undertakes the formalization of a due diligence process through a proactive approach that enables the effective adoption of appropriate measures to identify, evaluate, prioritise, prevent, mitigate, and, where appropriate, repair actual or potential adverse impacts on the environment related to its products, services and operations and those of natural or legal persons with whom the Group companies maintain a commercial or business agreement (hereinafter the "**Business Partners**") along the Chain of Activities.

The principles established in this Policy must be interpreted and complemented by different internal policies and Standards that make up the ACS Governance System which project onto the ACS Group; these include, among others, the Code of Conduct, the Sustainability Policy, the Human Rights Policy, the Code of Conduct for Business Partners, the Corporate Sustainability Due Diligence Protocol and the General Risk Control and Management Policy.

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.
- **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.

- **Code of Conduct:** The ACS Group's Code of Conduct.
- **Code of Conduct for Business Partners:** The Code of Conduct for Business Partners of the ACS Group.
- **Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859:** the Corporate Sustainability Due Diligence Directive.
- **Human Rights:** Human rights.
- **ACS Group/Group:** ACS and the group 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 organizations whose purposes include the protection of the environment and the legitimate representatives of such persons, groupings, communities or entities.
- **IROs:** 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.
- **OECD:** Organization for Economic Cooperation and Development.
- **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:** The ACS Group's General Sustainability Policy.
- **Due Diligence Protocol/Protocol:** The Corporate Due Diligence Protocol on sustainability.
- **Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation:** Regulation on marketing and export associated with deforestation.
- **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. 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 those covered by 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 national 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 contacts that contribute to the better performance of the Group and its business Partners in matters of sustainability.

4. PRINCIPLES AND COMMITMENTS TO THE ENVIRONMENT

ACS and the companies forming part of the Group combine their business objectives with the protection of the environment and the appropriate management of the legitimate expectations of their stakeholders in this area.

To this end, the ACS Group has defined an environmental management framework governed by the Sustainability Policy.

In this sense, the general principles of this Policy are sufficiently flexible to accommodate the policy and planning elements developed by the Group companies in the different business areas, and to comply with the commitments acquired by them. In accordance with the aforementioned premises, this Policy establishes the following commitments:

- **Compliance with generally applicable legislation and regulations**, as well as other commitments voluntarily acquired in each of the offices, delegations, projects, works and services managed and developed by the ACS Group companies.
- **Protection of the environment and the sustainable use of air, soil and water** in the areas where the activities are carried out to guarantee the conservation of natural resources and habitats, including the prevention of pollution, based on the evaluation of potential impacts to the environment in each phase of the project, work or service, with the aim of designing processes that allow the environmental impact to be minimised as far as possible.
- **Continuous improvement in environmental performance management** by establishing and monitoring environmental objectives.
- **Information transparency**, through the periodic and complete dissemination and communication of information on the procedures used to manage and supervise environmental IROs and on the general environmental performance of the Group, all in accordance with the applicable regulations.
- **Training and awareness-raising** through training and awareness-raising activities for employees, business partners and other stakeholders.

The ACS Group companies will use all reasonable means available to them to ensure compliance with the aforementioned commitments to ensure that they are reflected in the operational standards and procedures necessary for the projection of this Policy onto the Group.

5. MAIN AREAS OF ACTION

The nature of the activities that form part of the business model of ACS and the Group companies involves direct interaction with the environment. In this sense, the main environmental risks and impacts resulting from these activities are related to the consumption of resources (including the consumption of materials, energy consumption and water consumption), the generation of waste and the possible impact on the natural environment and biodiversity.

To ensure the effectiveness of these environmental commitments, relevant environmental IROs are identified, evaluated and compared with the management systems of each Group company and the priority areas in environmental matters established for each business. In this regard, key objectives and indicators are established for each of these priority areas to monitor environmental performance, as well as improvement programmes and action plans by company or group of companies.

Taking into account the identified material environmental IROs, the main environmental measures of the ACS Group companies will focus specifically and operationally on, among others, the following areas of action: circular economy, energy and emissions, efficient and responsible use of water resources, water and soil pollution and biodiversity.

The commitments established in each area are projected onto the ACS Group companies, taking into account the materiality of the issue addressed and the technical and economic viability for each company in particular.

1. Circular economy

The circular economy responds to the global trend of striving to create value with fewer resources. The ACS Group aims to advance and proactively contribute to the transition towards the Circular Economy and has consequently developed commitments that project onto the companies of the Group for the implementation, to the extent possible, of a new non-linear economy, based on the principle of life-cycle analysis of products, services, waste, materials, water and energy, thereby involving, as far as reasonable, all stakeholders in order to proactively offer sustainable solutions. To this end, consideration

will be given at all times to solutions that have been consolidated over the last few decades, such as eco-design or waste prevention, management and recycling, as well as all new solutions that are developed.

The ACS Group's activity in this area will be governed by the following basic principles of action, adapted to the specific circumstances of each company:

- Consider and evaluate the main risks and impacts regarding the use of materials and waste management, taking into account the life cycle of projects and services.
- Promote the use of environmentally-responsible materials.
- Prioritise operational models that reduce resource consumption and waste generation, both in terms of quantity and hazard.
- Contribute to extending the usefulness of resources, by-products and waste through repair, reuse and recycling.
- Identify business opportunities to contribute to the circular economy through activities, products and services.

2. Energy and emissions.

Climate change entails the need to update production and consumption models in order to mitigate the physical and transition risks arising from it. This requires the involvement of the public and private sectors, which must work together and in a harmonised manner. In this sense, the ACS Group aims to contribute to the transition towards a low-carbon economy by promoting climate change adaptation and mitigation measures within its different business activities.

Furthermore, local pollution control is particularly important to ensure the well-being of the communities where the Group operates.

The ACS Group's activity in this area will be governed by the following basic principles of action, which will be adapted by the Group companies to their specific circumstances:

- Consider and evaluate the climate change impacts of their activities, products, services and operations.
- Avoid or minimise energy consumption and emissions of greenhouse gases generated by their activities.

- Establish greenhouse gas emission reduction targets aligned with the latest recommendations and standards.
- Avoid or minimise pollution generated by their activities, consisting of emissions into the atmosphere, noise and vibrations or light pollution.
- Establish energy use and emissions management mechanisms that enable the objective measurement of performance developments and facilitate decision-making.
- Identify opportunities to promote environmentally-friendly products and services that are adapted to the potential impacts of climate change and contribute to the transition towards a low-carbon economy.

3. Efficient and responsible use of water resources

The ACS Group is aware of the importance of water in its activities and is committed to using water resources efficiently and sparingly, increasing water recycling and reuse, and making a positive contribution by implementing measures for efficient water use and protection.

The ACS Group's activity in this area will be governed by the following basic principles of action, which the Group companies will adapt to their specific circumstances:

- Consider and evaluate the main risks and impacts regarding the use of water resources.
- Apply measures to optimise water consumption and reduce the volume and risk of discharges in the development of its activities and services.
- Identify business opportunities that contribute to the efficient use of water resources, the reduction of water stress and the reduction of discharges.
- Proactively offer sustainable solutions and involve Business Partners in the Supply Chain, to the extent possible, in the development and implementation of these solutions.

4. Biodiversity

The development of the Group's business inevitably gives rise to interactions with ecosystems that may alter their initial value. For this reason, the ACS Group seeks in its operations to achieve a balance between development and conservation of biodiversity

and natural capital, as well as to respect the commitment to non-deforestation in the terms set out below, focusing in particular on the protection of enclaves that have ecological, scenic, scientific or cultural interest, in accordance with the following basic principles of action, which the different Group companies will adapt according to their particular circumstances:

- Consider the initial value of ecosystems that may be significantly affected by activities, products and services.
- Assess the risks and impacts of activities, products and services on ecosystems, including those in the chain of activities, focusing especially on direct and indirect suppliers whenever the contracted activity is critical for biodiversity.
- Apply ecosystem impact mitigation hierarchy through prevention, reduction, restoration and compensation actions, especially in protected areas or areas of high biodiversity value.
- Implement management plans to preserve or restore biodiversity in those activities or services that have a significant impact on ecosystems.
- Establish non-action criteria to prevent the development of activities or services in certain areas based on criteria such as their intrinsic value, vulnerability, importance or criticality.
- Strengthen measures to preserve/restore biodiversity in environmentally-sensitive area projects.
- Prevent deforestation arising from their activities and also from those of Business Partners whose contracted activity is critical to avoiding deforestation, through actions focused on compensation, restoration and reforestation, as well as promoting the use of certified and recycled wood.

The ACS Group has adequate measures for flora and fauna conservation based on:

- Physical protection, transplantation or transfer, as well as respect for the life cycles of the affected plant and animal species.
- Environmental impact studies, which identify the main risks and impacts of projects on the natural environment and establish actions to minimise them. Public participation in the approval procedures for these projects is guaranteed

by the national and regional legislation of each country in which they are developed.

- Surveillance plans, ensuring compliance not only with mandatory biodiversity and forest conservation regulations and standards, but also with the preventive measures envisaged therein, and reducing the impact of projects and processes that are not subject to environmental impact assessments.
- Promote the compensation of impacts caused by activities on biodiversity and forest mass through restoration, recovery and reforestation actions.

6. POLICY IMPLEMENTATION

The responsibility for managing and supervising the environmental performance of the ACS Group based on the strategic guidelines established by ACS with projection onto the Group falls on the responsible environmental body of each subgroup of companies; this will be achieved through appropriate action plans and improvement programmes, as well as the adoption of appropriate measures to reduce and mitigate the environmental impacts related to the Group's activities.

To this end, the Group's companies will encourage the establishment of mechanisms and procedures to promote compliance with the principles of this Policy, including the following:

- **Carry out activities in accordance with current legislation** in this area.
- **Pursue continuous improvement in environmental matters**, implementing an environmental management system that ensures compliance with the Standards, the establishment and monitoring of measurable objectives in this area that enable the evaluation of the evolution of performance and its consideration in decision-making processes.
- **Monitor the environmental impact in their respective Chains of activities.**
- **Promote and encourage their Business Partners to have their own environmental policy and to comply with the provisions established in the Code of Conduct for Business Partners.** If they do not have their own policy on the matter, they should subscribe to the Environmental Policy of the ACS Group or of the Group company in question, extending best sustainability practices to their entire Chain of activities.

- **Incorporate non-financial criteria, including sustainability criteria, in the approval of Business Partners** and implement mechanisms to detect bad practices in this area.
- **Consider, in contracting processes with third parties, evaluation criteria that take into account environmental performance**, as well as the implementation of contractual clauses that guarantee the alignment of their operations with the commitments assumed by the ACS Group in environmental matters, whenever necessary.
- **Promote training and awareness** of employees regarding environmental aspects through specific programmes, both in person and remotely, as a method to raise awareness and instil the principles established in this Policy.
- **Promote actions aimed at raising awareness among customers and business partners** regarding the aspects covered under this Policy.
- **Encourage participation or association** with external organizations of recognised prestige that promote compliance with the principles of this Policy.
- **In the case of corporate operations**, analyse the impact thereof in accordance with the principles established in this Policy.

In order to ensure that the commitments undertaken in this Policy govern the activity throughout its Chain of Activities, the ACS Group has established certain procedures that project onto the Group in its Due Diligence Protocol.

In turn, ACS will adopt the appropriate measures necessary to identify, evaluate, prioritise, prevent, mitigate or, where appropriate, repair the adverse impacts on the environment identified, which will be adjusted to the specific circumstances in each case and the degree of influence of the ACS Group companies on them, always complying with the provisions established in the Due Diligence Protocol.

These procedures and their results are monitored and reviewed periodically to ensure their correct functioning and results, including, to the extent possible and reasonable, the participation of the stakeholders, in accordance with the provisions established in the Protocol.

The different companies in the ACS Group will be responsible for carrying out environmental due diligence processes in the development of their activities, in accordance with the guidelines established in the Protocol.

The Protocol will be publicly accessible on the ACS corporate website (www.grupoacs.com).

7. GOVERNANCE

This Policy includes the bases of ACS's governance in sustainability matters as established in the ACS General Sustainability Policy with projection onto the Group. In this regard, consideration is given to the competences and functions attributed to, on the one hand, the Board of Directors and the Audit and Sustainability Committee, and on the other hand, the Sustainability Directorate and the Governance and Compliance Committee.

8. WHISTLE-BLOWING AND COMPLAINTS CHANNELS

All Members of the Organization and, in general, authorised 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 Operating Policy of the Ethical Channel of ACS.

9. APPROVAL, DISSEMINATION, ENTRY INTO FORCE AND VALIDITY

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 sustainability due diligence obligations.

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

10. 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.