

9. ESRS S-3. Affected Communities

9.1. Strategy

As a result of its business model, the ACS Group has a direct and continuous relationship with local communities and indigenous populations. These stakeholders are considered highly relevant due to the coexistence arising during the Group's activities, particularly in the Turner, Cimic, Engineering and Construction segments, where stakeholders adjacent to the construction sites are affected, as well as in Other Businesses (Services), with the local communities close to the companies' activities having the closest relationship. These local communities are differentiated into two groups:

- **Affected communities:** This refers to the local populations living in the vicinity of the areas where the Group operates and who are affected positively or negatively, directly or indirectly.
- **Indigenous peoples:** Indigenous peoples are communities with their own social, cultural and economic identity, closely linked to their ancestral territories, whose traditions, rights and ways of life must be respected and protected.

Honouring human rights and respecting local and indigenous communities is a priority for the ACS Group, which promotes the implementation of measures aimed at minimising the negative impacts associated with its activities, ensuring constant dialogue with local stakeholders and creating shared value in the settings in which it operates, and acting as a driver of economic and social development through the generation of jobs, training and support for social initiatives.

In 2025, no firm convictions were reported in relation to violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises involving affected communities.

9.1.1. *ESRS 2 SBM-2 Interests and views of stakeholders*

In the ACS Group, local communities represent a highly relevant stakeholder group, given the direct influence that the Group's activities have on the territories in which it operates. The nature of ACS's business model involves constant interaction with local communities, through the channels detailed in section [0.2.2. SBM-2: Interests and views of stakeholders](#).

9.1.2. *SBM-3 Material Impacts, Risks and Opportunities and their interaction with strategy and business model*

The material impacts identified in relation to the organisation's own workers are explained in section [0.2.3. SBM-3: Material Impacts, Risks and Opportunities and their interaction with strategy and business model](#).

9.2. Management of Impacts, Risks and Opportunities

9.2.1. *S3-1: Policies related to affected communities*

To carry out its strategy, the ACS Group has various policies aimed at promoting respect for human rights and access to information for local communities, and at preventing and managing impacts on indigenous peoples, through which material IROs are managed.

Among the most significant are the Code of Conduct, the General Sustainability Policy, the Human Rights Policy, and the Sustainability Due Diligence Protocol, all of which are set out in section [0.5.1. MDR - P: Policies adopted to manage material sustainability matters](#) of this report.

9.2.2. S3-2 Processes for engaging with affected communities about impacts; and S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns

The ACS Group recognises the importance of local communities as key stakeholders in the territories in which it operates, promoting a sustainable and respectful approach to the environment and the people affected. To this end, the Group has set up processes of active engagement, listening and remediation of negative impacts.

The relationship with local communities starts at the initial phase of the projects. ACS's customer is responsible for conducting the Environmental Impact Assessment (EIA) and obtaining the necessary permits. During this phase, a process of active listening to stakeholders takes place, allowing the communities to express their needs, concerns and expectations. The aim is to identify any potential impacts in the engineering, construction, operation or maintenance phases.

ACS works closely with the customer at this stage, proposing alternative solutions to minimise the environmental and social impacts, favouring a positive resolution of the EIA and providing added value to local communities.

The Group's Sustainability Department is responsible for overseeing these processes and coordinating with the various Group companies to manage the identified impacts and implement preventive and corrective measures.

During the construction phase, local communities, including indigenous peoples and other stakeholders, can voice their concerns through the ACS Group's Ethical Channel, as explained in section [11.2.2. G1-1 Corporate culture and business conduct policies and corporate culture](#) of this report. The submissions received are assessed in detail and, where necessary, specific measures are taken to address and remedy any negative impacts. If a proven current material negative impact is identified, the ACS Group takes the measures set out in its Corporate Sustainability Due Diligence Protocol.

The information gathered through these mechanisms is analysed to identify areas for improvement and assess the effectiveness of the measures taken, and is incorporated into the internal processes on impact management and continuous improvement.

The Corporate Sustainability Due Diligence Protocol, updated in 2024, also states that local communities must be consulted in the phases of reporting, definition of indicators, development of preventive and corrective action plans, decision-making and adoption of remedial measures. Where direct collaboration is not possible, independent experts, such as civil society organisations or human rights and environmental advocates, are used.

In regions with indigenous populations, the ACS Group's guiding principles include respecting the rights of indigenous peoples, in accordance with local legislation and corporate values, all of which are guided by international standards. If indigenous communities hold rights over the land on which a project's activities are to be carried out, that indigenous community's right to free, prior and informed consultation and consent must be honoured. The application of this commitment will follow the guidance offered by the United Nations Office of the Commissioner of Human Rights. Where any of our Group entities are the direct owner of applicable land or where it is asked to assist with the FPIC processes by our clients, it will be encouraged and supported that appropriate consultation processes are followed. In all other cases, appropriate actions will be taken to support client-led efforts for free, prior and informed consent, obtained through consultation and applicable legal processes. This is alongside various other community engagement initiatives. For Indigenous communities, consultation will be conducted in good faith, with the goal of cooperative development as an indication of consent

In short, the ACS Group promotes active collaboration, attentive listening and effective restitution of negative impacts, consolidating its commitment to sustainable development and respect for the rights of the communities affected by its activities.

9.2.3. S3-4 Taking action on material impacts on affected communities

The ACS Group has various actions and resources to manage material IROs with local communities and indigenous populations. By implementing these actions, the Group seeks to mitigate the negative impacts while also maximising the creation of shared value. The main initiatives implemented are included. ACS generates value for local communities, not only through the following actions, but also through its social action initiatives that go beyond those that are mandatory, and that are discussed in detail in chapter [13. Donations and Foundations](#).

The ACS Group has adequate resources to manage the affected communities. The main resources, both in terms of personnel and financial resources, are focused on respecting their rights, actively listening to their needs and expectations, and incorporating their considerations into the Group's strategy. All these measures are carried out on an ongoing basis and are expected to continue to be implemented over the coming years (in the medium and long term). Furthermore, they are linked to the targets of the 2025 Sustainability Master Plan.

Generating Value through Active Listening to Local Communities

Link to policies	General Sustainability Policy.
Scope of the action	Own operations and downstream in the value chain
Progress on the actions	In 2025, the ACS Group's funds allocated to Social Action amounted to EUR 15.9 million (including Thiess and Dornan).

Description of the action

The ACS Group maintains a firm commitment to active listening and continuous dialogue with the local communities in the areas where it operates.

In addition, ACS collaborates with local associations, NGOs, public and private organisations, as well as companies that promote social action. Through these sources of information, both direct and indirect, the Group identifies and assesses the needs and expectations of local communities, and integrates them into its social action strategy. Specific examples of these projects are provided in chapter 13 of this report.

Encouraging companies to buy local

Link to policies	Code of Conduct
Scope of the action	Own operations and upstream in the value chain
Progress on the actions	In 2025 the percentage of local workers was 98.5%, with 82.9% local suppliers (including Thiess and Dornan).

Description of the action

The Group companies have commitments to remain in most of the regions where they operate, actively contributing to the economic and social development of these settings. Because of this, the Group's companies favour the local hiring of employees and suppliers in the local settings where they operate, to generate social and economic value wherever the Group is present. Likewise, the ACS Group promotes not only the hiring of local personnel, but also encourages keeping the value chain in the place of origin, generating value in the communities, while reducing the environmental impact of transport. Thus, in 2025, 82.9% of the Group's suppliers were local (including Thiess and Dornan). In this regard, in using building materials, one of the Group's main inputs, the use of local suppliers or suppliers whose facilities are located in the immediate vicinity of the projects is actively encouraged. This not only creates shared value in the community, but also helps reduce transport costs and emissions.

Protecting and promoting the development of indigenous communities

Link to policies	Code of Conduct and Human Rights Policy
Scope of the action	Own operations and upstream in the value chain

Description of the action

The ACS Group respects the rights of indigenous communities, while promoting their development through direct or indirect hiring and specific training programmes for these communities.

Thus, for example, the ACS Group's companies, especially those operating in Australia and North America, maintain a constant and active focus on effective communication and engagement with indigenous groups. The actions with a short to medium-term time horizon include:

- Partnerships with Indigenous communities that support indigenous peoples' participation in employment and business opportunities, such as CareerTrackers, the Clontarf Foundation, Supply Nation, Kinaway Victoria – Indigenous Chamber of Commerce and the New South Wales Indigenous Chamber of Commerce at CIMIC.
- Using tools such as CPB Contractors' Aboriginal and Social Enterprise Playbook and indigenous peoples' supplier forums to share knowledge about procurement practices and improve engagement.
- Promoting the procurement from suppliers from indigenous communities
- At Cimic, the involvement of Indigenous communities is ensured through Reconciliation Action Plans, which encourage indigenous peoples to participate in and benefit from local training, employment and business opportunities.
- In Canada, Clark Builders employs inclusive procurement practices to build the capacity of subcontractors and suppliers from indigenous communities. The company is a member of the Aboriginal Procurement Champions Group of the Canadian Council for Indigenous Business (CCIB), which awarded it its Bronze Partnership Accreditation in Indigenous Relations.

In addition to these initiatives, the ACS Group works to generate shared value in these communities through its Social Action programme, as described in chapter [13. Donations and Foundations](#) of this report.

9.3. Metrics and Targets

9.3.1. S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

To measure the effectiveness of the actions described above and to adequately monitor them, the ACS Group has set various targets in relation to the affected communities.

The targets and actions set by the ACS Group are identified through a process of listening to and collaborating with affected communities, considering them in the identification and management of IROs, policies and strategy, as explained throughout the chapter. In addition, the Group's performance is tracked against targets, specifying the progress toward each target.

The priority targets in relation to this topic are:

Keeping the proportion of employees from the local community above 90%

Link to policies	General Sustainability Policy, and Human Rights Policy
Baseline value and year	There is no baseline, as the target is to maintain a ratio of employees. The target was implemented in 2021.
Performance	The target is monitored annually. By 2025, 98.5% of the employees were local employees (excluding Thiess and Dornan)

Keep local suppliers above 75%

Link to policies	Code of Conduct for Business Partners
Baseline value and year	There is no baseline, as the target is to maintain a ratio of employees. The target was implemented in 2021.
Performance	The target is monitored annually. By 2025, 88.2% of the suppliers were local suppliers (excluding Thiess and Dornan)

Increasing the number of employees from vulnerable groups by 7% compared to 2020

Link to policies	General Sustainability Policy, and Human Rights Policy
Baseline value and year	The baseline is 9,819, with a base year of 2020. The target was implemented in 2021.
Performance	In 2025, the number of employees from vulnerable groups, including people with disabilities (which in Clece includes people at risk of social exclusion, women victims of gender-based violence and the long-term unemployed; and in Cimic includes employees from Cimic's indigenous communities) was 12,476: a 27.1% increase versus 2020 (excluding Thiess and Dornan).