

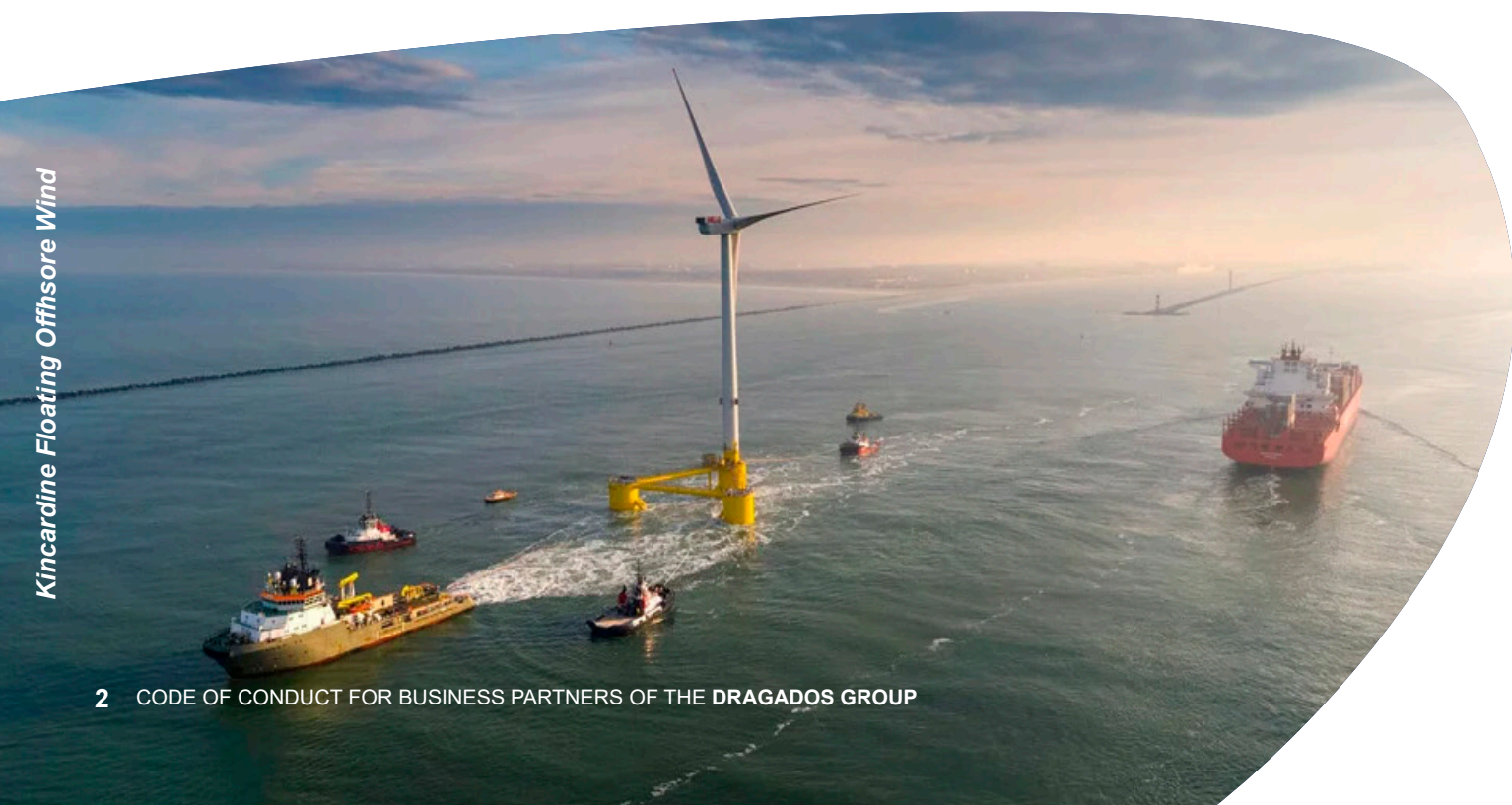


CODE OF CONDUCT FOR BUSINESS PARTNERS

DRAGADOS

CONTENTS

1. PURPOSE	04
2. SCOPE OF APPLICATION	04
3. BASIC PRINCIPLES OF CONDUCT	05
3.1 Compliance with the Law	05
3.2 Conflict of Interest	05
3.3 Zero Tolerance for Corruption and Prevention of Money Laundering	06
3.4 Competition Law Compliance	06
3.5 Accounting and Tax Integrity	07
3.6 Information Security, Data Protection and Confidentiality	07
3.7 Respect for Human and Labour Rights	08
3.8 Professionalism	09
3.9 Customer Orientation	09
3.10 Professional Development. Training	09
3.11 Health and Safety at Work	10
3.12 Transparency	10
3.13 Quality Management and Respect for the Environment	10
4. ETHICS CHANNEL	11
5. NON-COMPLIANCE	11
6. APPROVAL, DISSEMINATION AND ENTRY INTO FORCE	12
7. ADDITIONAL CONSIDERATIONS	12



1. PURPOSE

In order to ensure the effectiveness of the commitments made by the DRAGADOS Group (hereinafter referred to as the "**the Organisation**" o "**the Company**") related to ethics, regulatory compliance, respect and protection of Human Rights and protection of the Environment, the purpose of this Code of Conduct for DRAGADOS Group Business Partners is to establish the parameters of behaviour expected of Business Partners. And in this sense, it is intended that they make their best efforts to implement the basic principles of conduct established in this Code in their activities, regardless of the fact that they must also observe other DRAGADOS Group Rules that may be applicable to them.

2. SCOPE OF APPLICATION

The content of this Code is part of the DRAGADOS Group's Code of Conduct, and is mandatory for all its Business Partners, regardless of their geographical location.

Business Partners must expressly accept, through their signature and compliance commitment, the content of this Code and, where necessary, if circumstances so require, the Criminal Risk Prevention Policy, the Anti-Corruption Policy, the Competition Policy, and the Human Rights Policy.

The DRAGADOS Group promotes constructive collaboration with stakeholders or interested parties who may affect or be affected by the activities of the Group and its Business Partners, with the aim of establishing channels of communication, consultation, and engagement that contribute to improving the performance of the Group and its Business Partners in the field of sustainability (hereinafter "**Stakeholders**" or "**Interested Parties**").



N-260 Road. Huesca, Spain

3. BASIC PRINCIPLES OF CONDUCT

Business Partners shall ensure that all their actions are in line with the values advocated by the DRAGADOS Group in its Code of Conduct and, in particular, with the basic principles of conduct set out in this Code.

Whenever there are differences between the provisions of this Code and the local rules applicable to the Business Partner, the local rules shall be complied with, without prejudice to the Basic Business Principles set out in this Code.

In any case, Business Partners must carry out their activities in accordance with the Principles set forth in this Code and with any other DRAGADOS Group Policies that may apply to them, extending these to all entities or individuals that are part of the DRAGADOS Group's value chain, establishing mechanisms to communicate them and adopting reasonable measures for their verification.

Likewise, Business Partners must have a Purchasing Policy with sustainable criteria for their chain of activities, or have criteria for action with regard to the same, similar to those defined in this Code, or adhere to the Sustainable Purchasing Policy in force in the DRAGADOS Group. They shall also report on this if requested to do so by the Organisation.

3.1 Compliance With Legality

Business Partners are responsible for ensuring that all their decisions and actions are made in full compliance with the applicable laws and regulations in each of the countries or territories in which they operate. Consequently, they shall have supervision and control mechanisms in place to enable them to cover this commitment and shall inform the DRAGADOS Group thereof, if required by the Organisation.

3.2 Conflict of Interest

As a consequence of the principle of ethical conduct and zero tolerance for any act of corruption under which the DRAGADOS Group operates, our Business Partners are required to behave in a manner consistent with these principles in matters where there may be any type of conflict of interest—direct or indirect, actual or potential—that could undermine their independence of action or proper adherence to applicable regulations, and must therefore take the necessary measures to avoid decision-making being affected by a possible conflict of interest.

A conflict of interest is understood as any situation in which business, financial, economic, family, or personal interests could interfere with the judgement of a natural or legal person in the performance of their duties toward the organisation for which they work or provide services.

3.3 Zero Tolerance for Acts of Corruption and Prevention of Money Laundering

The DRAGADOS Group prohibits all forms of corruption, especially bribery in both the public and private sectors. In this regard, Business Partners must comply with both national and international regulations applicable to them in this area. In particular, Business Partners are strictly prohibited from making, promising, offering, accepting, or requesting any type of payment to authorities, public officials, executives, or employees of public or private entities or organisations, whether national or international, whether made directly or indirectly, through agents, intermediaries, advisors, or any other third parties.

In particular, Business Partners are prohibited from giving or receiving undue payments of any kind, gifts, handouts, gratuitous benefits or favours from public officials or third parties which are outside the legal market practice or which, due to their value, characteristics or circumstances, could reasonably lead to a disruption of the conduct of business, administrative or professional relations. They shall take appropriate measures to avoid such practices and, if requested by the Company, shall inform the Company accordingly.

Business Partners are expected to have organisational and management models aligned with international best practices and standards that enable them to comply with the principles of this Code, such as ISO 37001 on Anti-Bribery Management Systems.

In compliance with the relevant national and international provisions, the Organisation is fully committed to the prevention of money laundering and the fight against terrorist financing. Accordingly, Business Partners must take special care to avoid any activity or relationship that poses such a risk by taking the necessary measures to avoid them and to report them to the Company, if required to do so by the Company.

3.4 Defence of Competition

The DRAGADOS Group respects and encourages free, fair and honest competition. Therefore, Business Partners, within the framework of their relationship with the Group, may under no circumstances engage in practices contrary to the principles of free competition law. In this context, by way of example and without limitation, Business Partners must avoid:

- Collusive behaviour with competitors;
- Practices aimed at manipulating the outcome of public tenders;
- Exchanges of commercially sensitive or confidential information with competitors;
- Provisions excluding persons or groups of persons;
- Use of their companies' market power to exert unfair pressures on competitors and contractors.
- Fraudulent or misleading practices directed against competitors.

Business Partners shall put in place measures to avoid breaching national and international regulations on competition law and shall inform the Company about them, if so required.

3.5 Accounting and Fiscal Integrity

Business Partners must ensure compliance with the tax regulations in force in each country or territory where they operate, avoiding the concealment of relevant information, illegal evasion of tax payments, obtaining of undue tax benefits, obstruction of the oversight actions of the authorities, or the falsification of accounting or financial information. Likewise, the Business Partners shall collaborate with the Tax Authorities to provide the required tax information in accordance with the legislation in force.



Torres de Colón. Madrid, Spain

3.6 Information Security, Data Protection and Confidentiality

The activity of the DRAGADOS Group is framed within a sector in which maintaining the confidentiality of the information with which it works is fundamental to the success of the organisation's activities, especially with regard to tenders, bids and strategic guidelines. In this regard, maintaining the secrecy and confidentiality of such information is considered a priority for the Company.

Therefore, the Business Partners shall comply with their duty of confidentiality with regard to all information that they become aware of as a result of the present or future business relationship they maintain with the DRAGADOS Group, and the disclosure or transfer of confidential or non-public information is strictly prohibited, except with the express written authorisation of the person with authority to do so in the Organisation, or due to compliance with a court order or regulatory provision.

In order to fulfil this duty, it is the responsibility of the Business Partners to comply with national and international regulations on the protection of industrial and intellectual property rights, trade secrets and the protection of personal data.

In this regard, they must guarantee the adoption of sufficient security and cybersecurity measures to protect this information and ensure that all their members, within the framework of the relations they maintain with the DRAGADOS Group, comply with this duty. They shall also inform the Company of the measures taken for all the above purposes, if requested to do so by the Company.

Business Partners are expected to have organisational and management models aligned with international best practices and standards that enable them to comply with the principles of this Code such as ISO 27001 on Information Security Management Systems.

3.7 Respect for Human and Labour Rights

The DRAGADOS Group undertakes to act at all times in accordance with the UN Global Compact, to which it has adhered since its inception, and whose objective is the adoption of universal principles, including those relating to the protection of Human Rights.

It is imperative that Business Partners, regardless of the country in which they operate or the sector in which they operate, act diligently, responsibly and take appropriate human rights due diligence measures, including nationally or internationally recognised labour rights.

Trading Partners are also expected to comply with the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. They are also expected to demonstrate behaviours aligned with the UN Global Compact guidelines, the Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization Resolutions.

In particular, the Business Partners shall maintain mechanisms that enable them to reasonably ensure the effectiveness of their commitment with respect to:

The establishment of appropriate measures for the correct identification, assessment, prioritisation, prevention and mitigation of actual and potential adverse human rights impacts arising from its operations, products and services, as well as, where appropriate, the remediation of those that do materialise.

- The establishment of appropriate measures for the correct identification, assessment, prioritisation, prevention and mitigation of actual and potential adverse human rights impacts arising from its operations, products and services, as well as, where appropriate, the remediation of those that do materialise.
- The establishment of fair pay and acceptable working conditions.
- The guarantee of non-discrimination, direct or indirect, on grounds of sex, age, race, religion, sexual orientation, work style or talent, among others.
- Prevention of any kind of harassment.
- Occupational health and safety, as well as respect for workers' rights, in strict compliance with the labour regulations applicable in the jurisdictions where they operate.
- Promoting equity through equal opportunities.
- The eradication of both child labour and forced labour.
- Reject any activity linked to human trafficking or any kind of slavery.
- Freedom of association and guaranteeing the right to collective bargaining.

They shall inform the DRAGADOS Group of the measures provided for all the above purposes, in the event that they are required to do so by the Organisation.

3.8 Professionalism

The DRAGADOS Group's Business Partners must be characterised by their high level of professionalism based on integrity and focused on excellence in the provision of services.

3.9 Customer Orientation

The DRAGADOS Group seeks excellence in the provision of services to its clients, striving to satisfy their expectations as a key factor for the continuity of operations.

All the DRAGADOS Group's Commercial Partners will contribute their utmost collaboration, professionalism and service mentality to seek the greatest customer satisfaction. They will also strive to better meet the expectations of their customers and develop a proactive approach to understanding their needs. However, the achievement of such objectives shall never justify non-compliance with the law, the Culture of Compliance and the values and ethical principles of the DRAGADOS Group.

3.10 Professional Development. Training

Business Partners undertake to maintain a training policy for the learning and personal and professional development of their members in order to achieve the highest performance, quality and satisfaction in the performance of their duties, as well as the observance of the provisions of this Code. In particular, Business Partners undertake to train their members in the values and respect for the law set out in this Code.



3.11 Occupational Health and Safety

Respect for the health and safety of people is a primary objective for the DRAGADOS Group. Therefore, Business Partners must undertake to comply with the applicable regulations in this area, ensuring a safe and healthy working environment for its members, as well as the utmost respect for occupational health and safety regulations, in strict compliance with the applicable occupational risk prevention regulations.

Business Partners shall have procedures in place for the identification and assessment of safety and health related risks in the context of their activities, as well as for the prevention, detection and mitigation of such risks. They shall inform the Company of the measures taken for this purpose, if requested to do so by the Company.

Business Partners are expected to have organisational and management models aligned with international best practices and standards that enable them to comply with the principles of this Code, such as ISO 45001 on Occupational Health and Safety Management Systems.



HS2 Euston Station, London, UK

3.12 Transparency

In all their communications, Business Partners, regardless of the form in which they are made, must provide truthful, necessary, complete and timely information about the progress of the activities related to their performance, both to the Organisation and to third parties entitled to do so.

3.13 Management Quality and Respect for the Environment

The work and quality management of the DRAGADOS GROUP's projects generates confidence and an appropriate corporate image in the market. Quality management will be based, among other things, on respect for the environment and for people.

The DRAGADOS Group promotes, in accordance with its Environmental Policy, the application of best practices in environmental matters, such as the conservation of natural resources and environmental protection, the fight against climate change or respect for biodiversity, focusing especially on the protection of sites of ecological, scenic, scientific or cultural interest, committing itself to strict compliance with the applicable environmental regulations.

Therefore, Business Partners shall ensure compliance with the environmental regulations applicable to their activities and undertake to adopt appropriate measures to ensure the utmost respect for the environment, to combat climate change in the conduct of their activities and to minimise potential adverse environmental impacts.

In particular, the Business Partners shall maintain mechanisms that enable them to reasonably and proportionately ensure the effectiveness of their commitment with respect to:

- The establishment of appropriate measures for the correct identification, assessment, prioritisation, prevention and mitigation of actual and potential adverse impacts on the environment arising from its operations, products and services, as well as, where appropriate, the remediation of those that do occur.
- The fight against climate change, avoiding or minimising energy consumption and the emission of greenhouse gases generated by its activities.
- The promotion of the circular economy in its activities.
- Efficient and responsible use of water resources.
- Promoting pollution prevention by encouraging the reuse and recycling of materials, adjusting production processes, as well as using material substitutes
- The correct and safe handling, transport, storage, reuse or recycling of wastewater and waste generated on the construction site prior to reuse, recovery, discharge or disposal, as well as the correct treatment of substances as appropriate.
- The extension of good practices in matters of sustainability and care for the environment to entities or persons forming part of the DRAGADOS Group's chain of activities.
- To carry out its activities with respect for the cultural and social environment, as well as for the stakeholders affected by the development of its activity.

They shall inform the DRAGADOS Group of the measures taken for all the above purposes, in the event that they are required to do so by the Organisation.

4. ETHICS CHANNEL

The DRAGADOS Group provides all its Business Partners with an ethical channel through which they can make queries or report, denounce and communicate conduct or facts related to the actions of Members of the Organisation, of the Company or of its subcontractors or suppliers, which are not in line with the DRAGADOS Group Code of Conduct, with this Code or the rest of the DRAGADOS Group Standards and, in particular, those which may have criminal or competition implications or relevance in relation to Human Rights and the Environment. All of the above is in accordance with the provisions of the DRAGADOS Group's Ethics Channel Operating Policy.

5. NON-COMPLIANCE

Failure to comply with the provisions of this Code of Conduct for Business Partners puts the DRAGADOS Group at risk and may be subject to legal action.

In this regard, Business Partners are explicitly required to immediately inform the Company of any indications of non-compliance or violation of the principles of this Code and, where applicable, of the DRAGADOS Group Policies of which they become aware.

In the event of a breach of the provisions of this Code, the DRAGADOS Group shall react immediately on the basis of the provisions of the applicable regulations, promoting the measures legally available to it. The response will be proportional to the seriousness of the facts, and may include a request for the implementation of preventive or corrective plans or actions or, where appropriate, the suspension or termination of the contractual relationship, a complaint to the authorities and a request for compensation for damages caused.

6. APPROVAL, DISSEMINATION AND ENTRY INTO FORCE

This Code shall be applicable after its approval by the DRAGADOS Board of Directors on the date indicated.

The Code will be available on the Company's corporate website (www.dragados.com) and will be communicated to all Business Partners and all Group companies.

7. ADDITIONAL CONSIDERATIONS

Although this Code may be translated into different languages, the authentic version of the Code, for interpretative purposes, shall be the Spanish version.

Approved by the Board of Directors on 22 September 2025

DRAGADOS