

Annual Report of ACS Group 2009



www.grupoacs.com



Cover photo: Works for an oil storage facility (Bahamas).

Corporate Responsibility Report of ACS Group 2009

Main figures of ACS Group

Area of Activity	Construction	Environment	Industrial Services & Energy	ACS Group
% of total sales 2009	25%	17%	42%	84%
Main environment indicators				
Materials used	Cement, steel, aggregates, bitumen, chemical products, wood	Solid urban waste, industrial waste, hospital waste, mineral oil, gas neutralization products, acids, water	Cables, concrete, iron, steel, gas, diesel, wood, lighting, paper, computer equipment, floated concrete, aluminum, reflective materials, copper, aggregates, electronic equipment, electrical and plastics	
Consumption of energy broken down by primary source				
Petrol + diesel consumption (million litres)	16.2	35.8	23.0	75.1
Natural gas consumption (m ³)	213,620	5,111,096	38,870	5,363,585
Electricity consumption (GWh)	51	110	30	191
Other consumptions (toe)	369	1,621	0	1,991
Total (toe)	21,754	53,303	26,496	101,553
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Water consumption				
Obtained from the public mains (m ³)	808,101	1,833,736	108,684	2,750,521
Obtenida de otras fuentes (m ³)	632,391	420,588	3,951	1,056,930
Total (m³)	1,440,492	2,254,324	112,636	3,807,451
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Waste water dumped ⁽¹⁾				
To the public network (m ³)	Not available	1,039,150	93,622	1,132,772
Drainage to the sea or rivers/lakes (m ³)	Not available	14,491	1,568	16,059
Total (m³)	Not available	1,053,641	95,190	1,148,831
<i>% of total ACS Group sales represented by the data obtained</i>	<i>0%</i>	<i>12%</i>	<i>34%</i>	<i>46%</i>
Greenhouse gas emissions				
Total direct greenhouse gas emissions (t CO ₂)	37,000	8,002,123	31,137	8,070,259
Total indirect greenhouse gas emissions (t CO ₂)	15,008	32,707	8,996	56,712
Total direct and indirect greenhouse gas emissions (t CO₂)	52,008	8,034,830	40,133	8,126,971
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Other significant emissions to the air (already included in direct emissions)				
NO _x (t)	0.10	360.3	0.00	360.3
SO _x (t)	0.20	0.6	0.00	0.8
Particles (t)	0.00	2.4	0.00	2.4
Other gases (t)	0.40	0.0	0.00	0.4
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>8%</i>	<i>28%</i>	<i>61%</i>
Savings of greenhouse gas emissions (t)				
	0	4,095,935	2,414,034	6,509,969
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Non-hazardous waste managed				
	Surplus land excavation and CDR (rubble, wood, plastics, paper and cardboard and metals)	Waste from treatment of urban waste	Paper, cardboard, electronic waste, scrap, municipal waste	
Total (t)	1,099,375	29,209	33,104	1,161,688
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Hazardous waste managed (t)				
	2,251	8,501	7,436	18,188
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Percentage of projects which are rated non-financial, such as environmental (%)				
	77%	0%	7%	27%
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>

(1) Not included treated water in the sewage treatment plants

Area of Activity	Construction	Environment	Industrial Services & Energy	ACS Group
Quality and creation of value for clients				
Investments dedicated to quality improvements (million of euros)	Not available	1.7	1.9	3.7
Percentage of the total production certified by the quality systems based on the ISO 9001 standard	100%	68%	88%	87%
Number of audits of quality carried out	198	44	287	525
Number of satisfaction surveys carried out	531	350	1,284	2,165
Percentage of the total answers of clients saying that they were "Satisfied" or "Very Satisfied"	87%	85%	80%	83%
Investments carried out in R+D+i (million of euros)	21	5	14	40
Commitment to the Natural Environment				
Percentage of the total production of the Group environmentally certified in accordance with the ISO 14001 standard	80%	70%	82%	79%
Number of environmental audits carried out	198	50	196	444
Number of significant environmental incidents registered	1,397	1	0	1,398
Number of environmental fines	26	1	1	28
Employees				
Total number of employees at 31th of December of 2009 (377 employees in the corporation and other subsidiaries of the Group)	20,014	83,317	38,468	142,176
Employees contracted directly and permanently	47%	3%	25%	15%
Employees contracted in relation to a specific project, work or temporary production joint venture.	53%	97%	75%	85%
Training				
Number of hours of study	181,072	765,681	371,027	1,317,780
Number of courses	892	3,131	2,721	6,744
Number of participants	11,524	32,143	12,544	56,211
Total investment (million of euros)	1.8	4.9	6.5	13.2
Courses by type of content: Production	524	772	1,509	2,805
Courses by type of content: Job Safety	288	2,280	1,045	3,613
Courses by type of content: Environment	80	79	167	326
Labour risk prevention and job safety				
Frequency rate (Represents the number of accidents that occurred during the working day per million hours worked)	26.7	42.8	25.9	36.1
Severity rate (Represents the number of working days lost due to accidents per 1,000 hours worked)	0.79	1.0	0.6	0.9
Incidence rate (Represents the number of accidents in relation to which sick leave was taken per 1,000 employees)	50.1	74.9	46.6	63.9

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Commitment



1. The ACS Group and Corporate Responsibility

The ACS Group is a worldwide reference in construction, services and energy activities. It is a group which participates in the development of sectors related to infrastructures, which are fundamental for the economy. A company committed to economic and social progress in the countries where it is present.

ACS' success rests on three basic pillars:

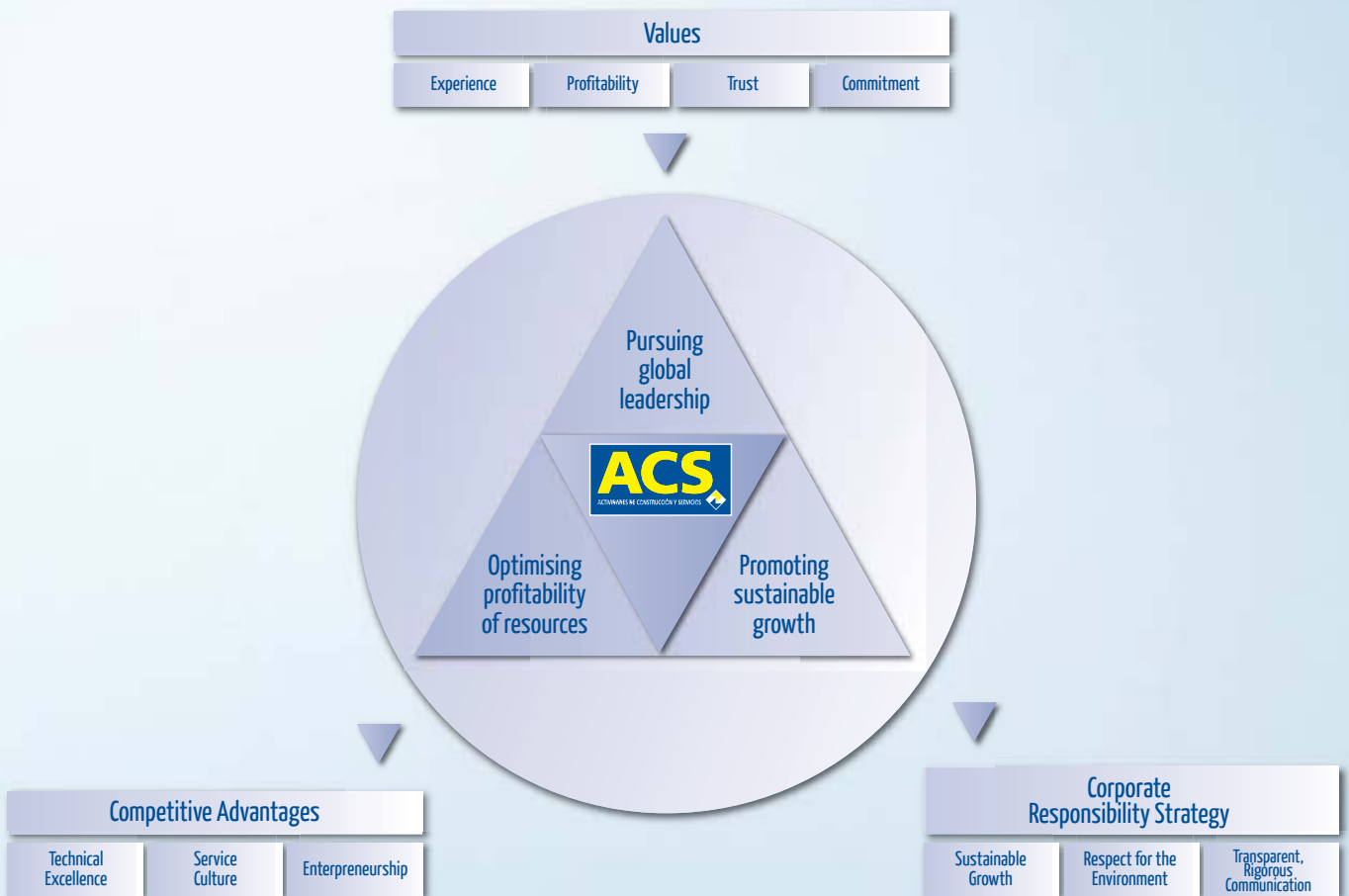
Values which form part of the organisation, experience, the quest for profitability, its clients' trust and the ability to make a commitment.

A **Strategy for Sustainable Development**, which improves social well-being, respects the environment and is based on a policy of transparency.

Competitive Advantages acquired through experience in the execution of a countless number of projects: technical excellence, a culture of service and an enterprising character.

These factors are key to the achievement of the ACS Group's mission, which is to pursue global *leadership*, *optimising the profitability of the resources managed for this purpose, while improving the society in which we live.*

The ACS Group is a worldwide reference in construction, services and energy activities.



1. The ACS Group and Corporate Responsibility

Therefore, the ACS Group provides its services and engages in its activities by means of the following:

- The development of infrastructures, civil engineering works, industrial facilities, energy plants, telecommunications systems and waste treatment and purification plants.
- The provision of services in the fields of integral management of urban, logistic and industrial infrastructures.
- Active participation in sectors essential to the economic and social development of any developed country such as infrastructures and energy.

Corporate responsibility is part of the ACS Group's vision and strategy; the sustained growth and responsible development of not only the Group but also the society of which it forms part is an intrinsic element of each of the activities it promotes and carries out.

With the objective of supporting this statement of principles, the ACS Group has worked over recent years on developing a culture based around sustainable development and corporate responsibility.

Over the last few years, the ACS Group has equipped itself with the corporate tools to enable it to put this strategy into practice in the company. This was firstly through the publication of the Commitment to Corporate Responsibility, then through the formalisation of the Code of Conduct, which was already in use but not regulated formally, and finally the declaration of commitment to combating Climate Change. These documents were approved by the ACS Group's Board of Directors and their regular supervision is one of the responsibilities of the Board's Audit and Control Committee.

These initiatives seek to standardise the ACS Group's procedures and to provide a whole series of uses and customs which had no formal institutional support until recent years with the status of rules.

The application of these initiatives, which are now fully in force, is monitored by the Secretary of the Board of Directors. There were no reports of significant incidents in 2009 deriving from the monitoring of the procedures brought together in the ACS Group's Code of Conduct.

Since its foundation, the ACS Group and its companies have made a commitment to the various parties forming part of its operations and interacting with the Group or its employees. This commitment is based on the ethical principles guiding the ACS Group's operations, which form part of its corporate culture.



The following outstanding initiatives were carried out during 2009 as a consequence of the ACS Group's Commitment to combating Climate Change:

- The ACS Group allocated a high level of resources to the development of Research, Development and Innovation initiatives and dedicated over €988 million to projects which reduce emissions of greenhouse gases in its operations.
 - Wind farms with a total installed power of 74 MW were developed in Spain in 2009.
 - Two thermal solar power plants for electricity generation with heat storage devices were developed and put into service, representing a total installed power of 150 MW at the end of 2009. These plants include very advanced technology and are a leap forward in the development of manageable thermal solar technology.
- Initiatives were undertaken in the ACS Group's Environment area to reduce emissions of greenhouse gases, which resulted in an 18.8% reduction of these emissions.

This link to corporate responsibility is part of the ACS Group's continual effort to work in accordance with the five commitments to sustainability it has assumed to define its relationship with the environment, society and the agents and stakeholders with which it relates. This is the ACS Group's response to the challenge of Corporate Responsibility.

Commitment to Sustainability is an inherent part of the ACS Group's corporate and business strategy.



1. The ACS Group and Corporate Responsibility

Five commitments of the Group ACS



Commitment to the creation of value, distributing the wealth created among its shareholders, clients, employees, suppliers and throughout the society as a whole.

Commitment to information transparency, so that those who have a relationship with the Company have accurate, reliable and accessible information available to them and are able to form an exact opinion of ACS.

Commitment to research, development and innovation with a view to the future, profitable growth and the quality of its products and services.

Commitment to the natural environment, implementing programmes and procedures which contribute to minimising the impact of the ACS Group's activities.

Commitment to individuals and the social environment through the creation of employment, wealth and the contribution to the wellbeing and prosperity of the societies in which it operates.

ACS and its Stakeholders

Stakeholders are defined as groups with the capacity to have an influence on the achievement of the organisation's objectives.



The ACS Group aspires to be recognised for its capacity to generate confidence among its stakeholders. Accordingly, providing channels to allow for honest, open and transparent dialogue is a priority.

2. Milestones from 2009 and Challenges for 2010



“(...) the decade beginning presents us with the challenge of beating the one just finished. With this objective we are going to keep working with the same effort and enthusiasm to maintain our leadership and continue creating value in a sustainable manner.”

Florentino Pérez Rodríguez
Chairman of the ACS Group

Main Milestones in 2009

Investment of over €988 million in renewable energy generation projects, to develop 74 MW of wind farms and 100 MW of thermal solar plants with heat storage.

Reduction of CO₂ emissions either directly or through the savings arising from the ACS Group's operating activity.

Inclusion of the ACS Group in the Dow Jones Sustainability World Index.

Investment of €40.0 million in research, development and innovation. This investment is equivalent to 4.8% of ordinary net profit (€842 million in 2009).

Recycling and reuse of 58.5% of construction and demolition waste.

Savings of 4,095,935 tons of CO₂ as a result of waste treatment activity.

The proportion of women in the ACS Group rose by two percentage points relative to 2008 figures, to 38% of the total staff.

A total of 2,165 satisfaction surveys were carried out in 2009, with 82.9% of replies being satisfactory or very satisfactory.

12% increase in the ACS Foundation's investment in social works.

Improvement in accident frequency and incident rate at a Group level, with a 5.5% reduction in accidents.

Objectives and Challenges for 2010

Investment of over €700 million in renewable energy. International expansion.

In accordance with the objectives for 2008, the ACS Group continues to work to increase certified activity according to ISO standards in relation to quality and the environment.

To increase investment in R+D+i to 2008 levels (around €50 million).

To begin measurement of Scope 3 CO₂ emissions, mainly produced by travel, the supply chain and internal logistics.

Reductions in electricity, water and gas consumption and in waste generation.

Continued promotion of equal opportunity practices in all of the Group's activities.

Reinforcement of the ACS Group's labour risk prevention systems in all activity areas, in order to improve the work-related accident rate as compared to 2009.

An increase of over 10% in the budget of the Grupo ACS Foundation.

3. Commitment to the Creation of Value

87.4%

of the production of the ACS Group took place under quality systems based on the ISO 9001 standard.

40.0

million euros were invested in Research, Development and Innovation in 2009.

ACS

is one of the companies which created most value for its shareholders in the first decade of the 21st century.



As part of its commitment to sustainable growth, the ACS Group aims to ensure that its investments are profitable while guaranteeing high quality operations and financial soundness and efficiency. This simultaneously generates value for three large groups of agents directly or indirectly related to ACS:

- Value is generated for clients to which projects and services related to infrastructures and energy are provided;
- Value is generated for shareholders through the financial profitability of the investments made; and
- Value is generated for the whole of society by fostering sustainable economic growth in the countries in which the Group operates.

The ACS Group's activity, which is committed to sustainable growth, directly or indirectly generates value not only for its clients and shareholders, but also for the whole of society.

Creation of value for clients of the ACS Group



In view of the nature of its clients, the ACS Group must constantly strive for excellence in order to guarantee their satisfaction. This objective is achieved through quality and a clear service vocation.

3. Commitment to the Creation of Value

Each year the ACS Group dedicates significant resources and effort to hiring and retaining the talent of its human capital, as well as to investments in research, development and technological innovation, in order to guarantee excellence in the provision of services to its clients.

The ACS Group defines Service Vocation as the appropriate management of its relationship with clients: providing solutions to their problems with a high degree of quality, excellence and flexibility, responding to incidents quickly and efficiently and guaranteeing a long lasting and profitable relationship.

One of the main characteristics of the ACS Group is its high level of decentralisation, which is evidenced in all the activity areas in which it competes. This structure allows for a lower level of control and degree of supervision, only affecting decisions which are truly of significance. The objective is to immediately ascertain the client's opinion and perception of the work performed, detect problems and share possible improvements.

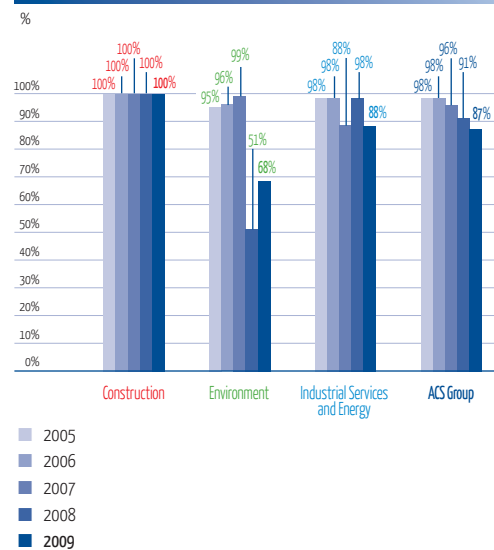
Special emphasis is placed on quality and resources are dedicated to the undertaking of activities which allow for the application of the most appropriate and advanced techniques in all areas. Investing in innovation, efficiency and the improvement of work systems and prioritising the adaptation of the entire organisation to clients is the path which has always been followed by the ACS Group since its creation.

In 2009, 87.4% of the production of the ACS Group took place under quality systems based on the ISO 9001 standard and certified by acknowledged external organisations.

The main goal of the search for quality undertaken by the ACS Group has always been to be the leading company in the sectors in which it operates.



Production certified according to the ISO 9001 standard



This chart includes the information on quality with reference to 87% of the ACS Group's turnover.

Professional Team: hiring and retaining of talent

To foster this Service and Quality Vocation, the ACS Group relies on the best of professional teams, as well as on technical expertise.

Each and every one of the Group's 142,176 employees contributes their experience and dedication to improving the quality of the services provided to clients. Given the Group's commitment to excellence, employees assume this responsibility which is part of ACS' idiosyncrasy.



Its employees are a genuine asset for the company and, accordingly, it is necessary to continuously and efficiently invest in training, professional development support and, mainly, occupational risk prevention policies. Considered within the numerous training initiatives are 1,317,780 hours of study in courses and studies relating to all its activities.

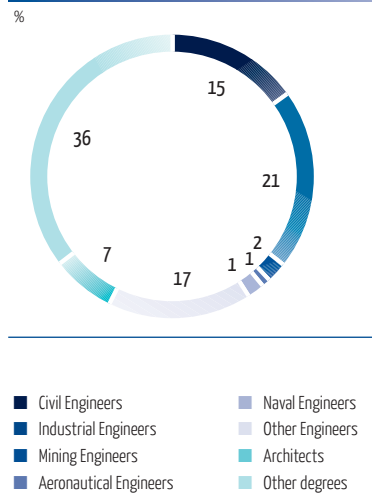
Of all the ACS Group's employees, 12,475 were directors or professionals with university and advanced degrees, 16,841 were technical and clerical staff and the remaining 112,860 were specialists and operatives.

This policy, in addition to motivation initiatives relating to hiring, remuneration and development, encourages the loyalty of professionals with talent.

The ACS Group and the companies it comprises have implemented measures aimed at retaining and motivating their employees, especially those displaying high potential.

Of the professionals with degrees, at the end of 2009 the ACS Group employed 6,610 engineers with more than 7 different specialities.

University graduates by type of training



One of the most significant employee motivation and satisfaction initiatives is the possibility of promotion. The turnover of the ACS Group and the continuous development of the company generate a significant number of annual promotions among the employees who, due to their efforts and efficiency, are nominated for positions of greater responsibility.

3. Commitment to the Creation of Value

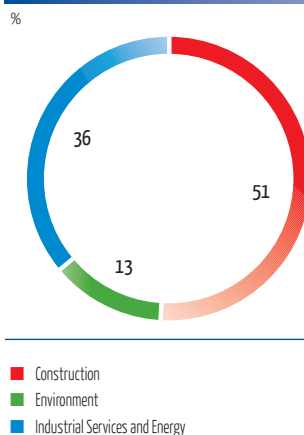
Technical Resources: Investment and fostering of R+D+i

The activities of the ACS Group are highly technical and require all the operating areas to develop projects and programmes enabling the most modern techniques to be employed in relation to the products and services offered to clients.



In this regard, the ACS Group continually invests in Research, Development and Innovation. Specifically, in 2009, such investments amounted to €40.0 million, 4.8% of the Group's ordinary net profit for continuing activities. These investments are dedicated to the carrying out of projects leading to tangible improvements in productivity, quality, client satisfaction, work safety, the obtaining of new and better materials and products and the design of more efficient production processes and systems.

Investment in R+D+i by area of activity



This activity is executed through projects performed in collaboration with universities and public and private research bodies, as well as members of consortiums of companies.

Without doubt, this is one of the facets which show that the ACS Group is among the top companies in R+D+i investment through its companies heading each activity area. Through numerous Construction projects, their leadership in various environmental research areas and the Group's presence at dozens of universities and in leading projects in Industrial Services are proof of this.

Creation of value for shareholders

At 31 December 2009, the share capital of the ACS Group amounted to €157,332,297, made up of 314,664,594 ordinary shares with a face value of €0.50 each, all of the same class and series. ACS' shares are listed on the Madrid, Barcelona, Bilbao and Valencia stock exchanges.



The ACS stock	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Closing price	8.37 €	9.13 €	10.22 €	12.90 €	16.80 €	27.21 €	42.71 €	40.65 €	32.65 €	34.81 €
Revaluation of ACS shares	6.58%	9.16%	11.86%	26.26%	30.23%	61.96%	56.96%	-4.82%	-19.68%	6.62%
Revaluation of the IBEX 35	-21.75%	-7.82%	-28.11%	28.27%	17.37%	18.20%	31.79%	7.32%	-39.43%	29.84%
Maximum closing price	10.73 €	11.15 €	12.33 €	13.13 €	17.03 €	27.23 €	43.62 €	50.95 €	40.99 €	38.75 €
Minimum closing price	5.70 €	7.08 €	8.86 €	9.88 €	12.68 €	16.98 €	26.96 €	32.10 €	24.03 €	27.67 €
Average in the period	8.88 €	9.64 €	10.20 €	11.80 €	14.16 €	22.22 €	34.21 €	43.08 €	32.66 €	34.61 €
Total volume of shares (thousands)	187,860	155,171	190,174	238,933	312,483	401,440	279,966	417,896	382,506	196,115
Average daily volume of shares (thousands)	751	621	761	956	1,245	1,568	1,098	1,652	1,506	769
Total effective traded (€ million)	2,661	1,496	1,949	2,847	4,563	8,989	9,386	18,003	12,492	6,759
Daily average effective (€ million)	10.64	5.99	7.80	11.39	18.18	35.11	36.81	71.16	49.18	26.50
Daily average effective (€ million)	192.18	192.18	192.18	355.58	352.87	352.87	352.87	352.87	335.39	314.66
Number of shares (millions)	1,608	1,755	1,963	4,587	5,928	9,602	15,071	14,344	10,950	10,953

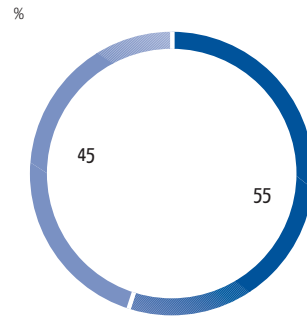


3. Commitment to the Creation of Value

The value of ACS Group shares rose 6.62% in 2009 to €34.81 per share.

Since the ACS Group's stock is in the form of bearer shares, there is no register of company shareholders. According to the most recent data available, there were 53,980 ACS shareholders at the time of the General Shareholders' Meeting held in May 2009. There were 48,874 resident minority shareholders who held 59.36 million shares between them. There were 5,106 non-resident shareholders and domestic institutional shareholders with a stake of 259.8 million shares.

Breakdown of holders of capital by type of investor



■ Reference shareholders*
■ Free Float

* Shareholding of over 5% and representation on the board

If an ACS shareholder had invested €100 on 31 December 1999, he or she would have had €619.17 at the end of 2009, meaning the investment had risen 6.19 times, including the re-rating of the share during this period and the dividends paid by the ACS Group.

The capitalisation of ACS has risen at a rate of 23.8% annually since 1999 and has given a shareholder total rate of return of 20%. Over the same period, the IBEX35 went from 11,641 points to 11,940, the value at which it closed on 31 December 2009, an annual rate of increase of 0.3%.

In the first decade of the 21st century, the current net value at present prices for all the flows for ACS Group shareholders, that is dividends, capital increases and decreases and appreciation in value, totals €6,841 million, which places the ACS Group among the Spanish companies which have created most value for their shareholders over the last decade (according to the report published in January 2010 by Professor López Lubián of the Instituto de Empresa).



Stock exchange evolution



ACS: leading value creation between 2000 and 2009

Creation of value for the shareholder of ACS

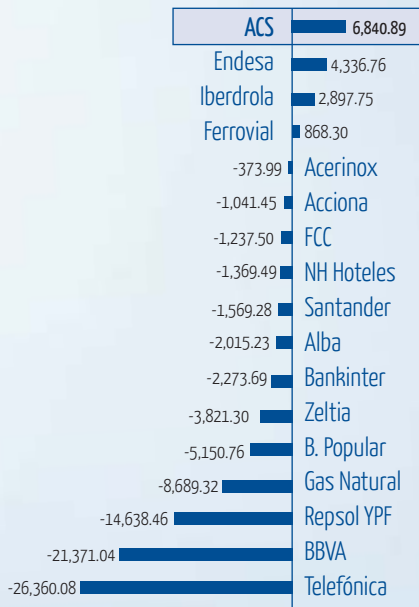
IBEX with Dividends
Millions of euros

Capitalization and ACS's dividends



Value creation between 2000 and 2009 according to the Instituto de Empresa Business School (IE)

Thousands of millions of euros



Average annual ACS profitability = 20%

The net present value of all ACS shareholder's flows between 2000 and 2009 accounts for € 6,841 million euros.



3. Commitment to the Creation of Value

During 2009 the ACS Group cancelled 20,725,833 shares, close to 6% of the capital, which means the total number of shares was reduced to 314.66 million. The objective of these measures is to increase profitability for all the ACS Group's shareholders.

ACS' inclusion in the Dow Jones Sustainability Index represents an acknowledgement of the Group's effort in recent years in relation to sustainable development and its significance in the company's business strategy.

The Dow Jones Sustainability World Index (DJSI World) includes the 300 leading companies in terms of corporate sustainability from twenty leading countries worldwide and accounts for 10% of the 2,500 largest companies listed on the Dow Jones World Index. Membership in this index is taken into account by the asset managers of 15 countries and has an influence on decisions taken in regard to investments, since the DJSI indices are used as a reference for the composition of portfolios focused on sustainability.

In 2009 the ACS Group was again selected as a member of the Dow Jones Sustainability Index, the most prestigious and important selective stock exchange index, assessing the effort made with respect to sustainability policies, as well as the commitment made to the general public and to the environment. The ACS Group was admitted to the world category (DJSI World).



Creation of Value for the societies in which the ACS Group operates

The ACS Group carries out projects for the construction, improvement, maintenance and operation of civil, industrial, environmental and energy infrastructures, including as an investor, employing its own resources in financing these assets for public use. It cannot be doubted that the use and enjoyment of these infrastructures unequivocally benefits the state of well-being of the societies where they are executed. Hundreds of kilometres of roads and railways were built in Spain, Greece, Ireland and the United States in 2009. Waste treatment plants were put into operation at several locations within the Iberian Peninsula, Morocco, France and Latin America and industrial and energy installations are maintained and developed in over 20 countries.

The ACS Group is one of the main direct and indirect employment generating companies. The Group's workforce grew by 0.8% during 2009, reaffirming ACS as an important driver in the generation of wealth for society, its employees, subcontractors and raw material and support services suppliers.

Several of its operating activities also lead to improvements in the environment, contributing a significant benefit to the society receiving these services. ACS treats over 11.5 million tons of rubbish generated by millions of inhabitants; provides water treatment services to over 8.5 million people; and generates sufficient clean electricity through the use of renewable energy sources to save over 2.4 million tons of CO₂ per year.



The ACS Group's mission includes a concept which is part of our commitment to the creation of value: "The search for profitability while improving the society in which we live".

All of the ACS Group's activities decisively contribute with economic and social benefits, in addition to forming part of the wealth of the societies they serve.

4. Commitment to Information Transparency

[www.
grupoacs.com](http://www.grupoacs.com)

ACS



ACS' website is visited by an average of 2,440 users daily, with 23,775 pages viewed.

Worldwide leader in the promotion of transport infrastructure projects by number of concessions, according to a survey by the specialised US publication Public Works Financing.

The ACS Group is a member of the Dow Jones Sustainability World Index.



One of the key elements of the ACS Group's strategy to fulfil its mission to satisfy its clients and to generate profitability for its shareholders and the society in which it operates is information transparency. The objective of this strategy is to ensure that its activity is as open as possible and that the interests of its clients and other stakeholders are respected. The ACS Group is committed to total rigour in the information transmitted, especially with respect to the media.

The transparency and rigour in the information transmitted, are the pillars of the ACS Group's communication strategy.

The value of information transparency

This general objective of transparency is achieved by following these guidelines:

- Transmitting the Company's overall corporate strategies, as well as those specific to each of the Company's business areas, to the outside world.
- Projecting the Group's business reality and ensuring that the Group is recognised as being sound and well-managed inside and outside of Spain.
- Contributing to the makeup of a positive umbrella corporate image which aids in the achievement of business objectives and commercial activity.
- Maintaining a fluent relationship with external agents, particularly with representatives of the media.

All of the above contributes to an increase in the value of the ACS brand and of its different companies and businesses.

The ACS Group's relationship with all forms of media is fluently and transparently framed thanks to the relations set up through the Communications Department, the various media windows established for interviews, press releases and contacts on the corporate website, as well as via the Chairman and General Manager's meetings with journalists.



4. Commitment to Information Transparency

The definitive information tool: the ACS Website

The www.grupoacs.com website is a Group commitment to communication and transparency. It represents a pledge to clarity, accessibility and information.

The Group's website fulfils a series of objectives:

- Opening a "window" to society through which the company may be analysed with greater transparency and ease.
- Maintaining a permanent channel of communication with the Group's priority collectives and with any individual or company seeking any type of information on the Group.
- Openly offering all economic and financial information on the Group, its systems of governance and management and the activities it undertakes.

- Allowing the search for historical information on the Group for more thorough analysis of trends and performance.

- Maintaining up-to-date information on the performance of the Group and the criteria behind its management.

ACS' website is visited by an average of 2,440 users daily, with 23,775 pages viewed.

Similarly, to aid in their commercial and informational activity, the heads and subsidiaries of the ACS Group own and promote a large number of complementary web pages and information portals, intranets, online tools and remote reporting and training systems.

	Total 2005	Total 2006	Total 2007	Total 2008	Total 2009	Daily average 2009
Visits to the www.grupoacs.com portal	262,699	355,543	767,039	901,375	890,441	2,440
Pages viewed	5,396,472	5,569,879	4,772,895	9,694,451	8,677,863	23,775



Information transparency, the pillar of the ACS Group's excellent reputation

The measures aimed at promoting information transparency affect the Company's reputation, the extension of its corporate values and technical capacities and the broadcasting of its business success. In 2009, this was reflected in the numerous mentions and acknowledgements of the ACS Group in different forms of domestic and international media, of which most noteworthy were the following:

- Forbes magazine ranked ACS as the 182nd largest company in the world in its annual analysis listing the top 2,000 companies. ACS is the second largest company in the construction industry worldwide in this ranking.
- One of the largest contractors worldwide and one of the twenty most internationalised companies in the industry, according to the Top Global Contractors 2009 ranking published by the prestigious US engineering and construction magazine Engineering News Record (ENR).
- World leader in the development of infrastructure concessions according to Public Works Financing magazine.
- Member of the Dow Jones Sustainability World Index, placing the ACS Group among the worldwide leaders in sustainable development.
- Florentino Pérez, ACS Group Chairman, was selected among the 50 best chief executive officers in the world by Harvard Business Review magazine, in its September 2009 edition. Included in this ranking are the heads of the companies which have created most value for their shareholders worldwide.
- ACS Infrastructure Development was presented with the Developer of the Year prize in the United States in 2009 by Project Finance Magazine. It was also awarded Best Project of 2009 by ARTBA (American Roads and Transportations Builders Association) for the I-595 interstate expressway in Florida. Furthermore, Euromoney Project Finance magazine adjudged the expressway's financing as the winner of the "North America Transport Deal of the Year 2009".

Communication and transparency of information reported to markets

The shareholders' right to information is detailed in several parts of the Shareholders' General Meeting By-laws. Hence, in order for the Shareholders' Meeting to properly serve the function for which it was designed, the Board of Directors of the Group makes available to all shareholders, prior to each Shareholders' Meeting, all the information which is legally required to be provided to them, in addition to information that is not legally required to be provided, but that should reasonably be made available, given the interests of the company and of the shareholders for them to form their opinion. In this regard, the Group makes every effort to respond duly to requests formulated by shareholders for the purpose of the General Shareholders' Meeting, regardless of whether these requests are formulated before or after Shareholders' Meetings, provided that the Company's interests are not jeopardised.

The ACS Group uses different channels to meet its commitments on communication and transparency in order to foster flexibility, fairness, immediacy and increased scope in the information published.

Information reported to the market

The ACS Group uses the Spanish Stock Market Commission as the main channel by which to communicate and announce its performance and principal undertakings.

Nineteen "Relevant Facts" were communicated through the Commission during 2009. Additionally, in 2009, the Group made 11 corporate presentations at specialised events held in Europe and the USA, and held 180 meetings with institutional investors.

Financial information

The ACS Group makes annual and quarterly standardised financial reports and reports on the Group's performance available and also responds to requests for information by holding meetings with other market agents. These meetings are meant to complement the Group's reporting efforts and the objective thereof is to clarify information already published in accordance with investors' and shareholders' needs.

 For further information, see the web page www.grupoacs.com or contact info@grupoacs.com

5. Commitment to Research, Development and Innovation

20.60

*million euros
invested in R+D+i in
the Construction area*

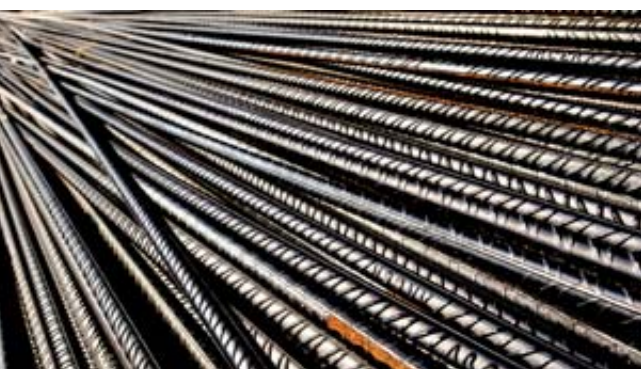
5.17

*million euros invested
in R+D+i in the
Environment area*

14.27

*million euros invested in
R+D+i in the Industrial
Services and Energy area*

*The ACS Group invested 40.0 million euros in R+D+i in 2009,
representing 4.8% of ordinary net profit for continuing activities.*



The ACS Group is a company which evolves each year and adapts to the needs of its clients. The diversification process undergone by the ACS Group over the years has led it to undertake a wide range of activities, each of which has its own features and approaches innovation and development in a different but decided manner. This commitment to innovation is the ACS Group's response to the growing demand for process improvements, technological advances and service quality by clients and the society which the Group serves.

Each year, the investment and effort made in research, development and innovation is increased, resulting in tangible improvements in productivity, quality, client satisfaction, workplace safety, the obtaining of new and better materials and products and the design of more efficient production processes and systems.



The ACS Group leads its sector in terms of R+D+i efforts.

5. Commitment to Research, Development and Innovation

Main areas of investment in R+D+i by the ACS Group

Construction

New construction processes and improvement of facilities.

Occupational Safety and Prevention.

Railway infrastructure, high speed and track mounting.

Monitoring and control of civil works using lasers.

Environmental restoration systems.

Decontamination of soil and underground water.

Environment

Technological Observatory for Solid Urban Waste Treatment for maximum exploitation and minimum dumping. OTERSU+-Project.

Waste treatment.

Water treatment.

Innovations in rubbish collection vehicles and systems.

Optimisation of sludge treatment in waste water purification plants.

Industrial Services and Energy

Industrial services and energy.

Thermal solar energy with heat storage and manageability.

Road safety.

Off-shore wind power.

Advanced systems for mobility management and winter road administration.

Techniques for carrying out highly complex industrial assembly operations.

The ACS Group is among the leaders in its sector in terms of R+D+i efforts. For each area of activity, the Group has assigned a Technological Development Committee, whose function is to promote and analyse the Group's technological development and innovation initiatives in the field of technology, machinery and equipment, and in the improvement of procedures within the company's different activities.

In 2009 the ACS Group invested €40 million in projects relating to research, development and innovation.

Construction

R+D+i activity continued in 2009 in the Construction companies, with improvement being made to the management systems for R+D+i certified by the Spanish Standardisation and Certification Association (AENOR). Work was carried out in 2009 with the objective of:

- Promoting interaction between R+D projects and the companies' production and with their clients.
- To drive the coordinated strategy of the ACS Group's construction companies through the Committee for the coordination of R+D+i, promoting:
 1. The visibility of the companies' R+D+i.
 2. The pooling of information on R+D+i.
 3. Coordinated work on R+D projects.

Investments in R+D+i in the construction area exceeded €20.6 million in 2009.

In the ACS Group's Construction area, work is being carried out on a large number of R+D projects, many of them with partial public financing. Collaborative work was carried out with clients such as the Administrator of Railway Infrastructures (ADIF), the Spanish Port System, port authorities, the Municipal Housing and Land Enterprise of Madrid (EMVS), etc and with research organisations, outstanding among which were:

- Research centres (CEDEX, IETcc, Jaume Almera, Ciemat).
- Universities (Politécnica de Madrid, Politécnica de Cataluña, Cantabria, Valencia, Carlos III de Madrid, Granada).
- Technology centres (Cartif, Aitemín, Aidico, Labein).

The company continued with its participation in research forums, among which are:

- Construction Technology Platforms (European and Spanish), leading the Spanish Platform.
- ENCORD European Group.
- Advisory Council to the European Commission's Seventh Framework Programme (NMP area).
- Spain's CEOE employers' association Technological Innovation Commission, the SEOPAN export group R+D+I Commission and the Roadway Engineers' Association R+D+I Commission.

The main European and domestic R+D projects in which the company took part during 2009 were:



Underground construction

- Tunconstruct: tunnel planning, construction and maintenance.
- Multidimensional City.
- Explotun: recognition and reinforcement of terrain in front of the tunnel borer.

Hydraulic works

- ALIVESCA: Spillways without side walls in roll compacted concrete dams.

Infrastructures for surface transport

- OASIS: Optimisation of motorway use.
- CLEAM: Sustainability in transport infrastructures.
- SKIDSAFE: Enhanced Driver Safety due to improved Skid Resistance.
- VIADENTEL: Modelling and monitoring of railway structures.
- Elimination of expansion joints in old bridges.
- Device and method for direct rail unloading on bearing plates in parallel lines.
- New composite materials for state-of-the-art railway lines.
- Conservation of infrastructures based on computational intelligence.
- Photogrammetric system for follow-up on linear works.

¹ Data referring to all the construction area companies except for Dravosa and Cogesa.

5. Commitment to Research, Development and Innovation

Marine works

- SAYOM: Prediction of swell and interaction with marine works.
- CLIMAR: Effect of climate on port works.
- DYNAPORT: Durability of port works.
- DILAPE: Vertical breakwaters with pendulum plates to deaden the incident swell and extract energy.

Building

- ManuBuild: Open building industrialisation.
- I3CON: Industrialised, intelligent and integrated construction of buildings.
- INVISO: Industrialisation and sustainability of buildings.
- ARFRISOL: Bioclimatic architecture.

ICTs

- ALOE: Laser monitoring of roads and buildings.
- SICURA: Augmented reality applied to the maintenance of tunnel borers and to construction in building works.
- SAMCI: Advanced sensors and continuous monitoring of structures.
- MAPLA: Platform for preventive maintenance of machinery.

Environment

- Elimination of boron by natural filtration in sea water desalination plants.
- System for the detection of contaminating volatile compounds for waste water purification plants.
- CICLOPE: Environmental impact of buildings throughout their life cycle - energy consumption and associated greenhouse gas emissions.
- PROMARES: Environmental protection of the coast and marine habitat.
- UPSOIL: Sustainable Soil Upgrading by developing Cost Effective Biochemical Remediation Approaches.
- Environmental restoration of coastal zones by means of dredging characterisation and assessment of muds and sediments with organic and inorganic contaminants.
- Diffusion of pollutants in urban waste dump barriers and their trends over time.

Others

- TailorCrete: Elements in concrete with complex shapes.
- Robot@CWE: Robot/human interaction.
- PATRAC: Accessible cultural heritage. A no-barriers culture.
- New materials and their behaviour in GRC.



Outstanding among these activities are the underground construction projects, with two large projects completed in 2009:

The **Multidimensional City** project financed by the Ministries of Education and Science and Science and Innovation. This four-year project was led by Dragados and 22 organisations took part, both companies (FPS and Geocisa, among others) as well as research institutions. The objectives of the project were:

- Innovation in ground treatment techniques and construction techniques.
- Development of new materials and structural elements for tunnels.
- Communications systems which reduce the necessary distributed antenna infrastructure for wireless communication.
- Improved fire safety in tunnels through understanding of the behaviour of fires inside a tunnel.
- The development of an integral management system for all the information generated by the works for an overview of the construction process.
- Improved training of personnel involved in guiding tunnel borers and jumbo drills by means of new immersive entertainment simulators.
- Modelling by means of numerical methods of physical phenomena which take place in underground works, based on the combination of finite element and particle techniques, as well as discrete element methods.

The **Tunconstruct** project within the European Union's 6th Framework Programme, with the participation of 41 partners from 11 European countries, with major involvement from Spanish organisations (Dragados and Geocisa, among others). Dragados led one of the four subprojects which made up the project, the objectives of which were:

- Planning: economic and safe design of underground works by means of virtual simulation of its construction.
- Construction: developments in the field of the machinery (tunnel borers, shearers, etc) and the materials (vault linings, shotcrete, etc) which enable productivity and safety to be improved and environmental impacts to be reduced.
- Processes: ground exploration methods and tools for continuous monitoring of the ground during excavation, as well as machine automation.
- Maintenance and repair: monitoring and inspection techniques which enable the characterisation of the structural condition of underground works. Models for the prediction of the service life of structures to optimise repairs. New repair materials and automation of the application process.



5. Commitment to Research, Development and Innovation

Among the developments made in these two projects, it is worth mentioning the following with the involvement of ACS companies:

Geophysical probes for ground exploration

Insufficient knowledge of the ground through which a tunnel is to be made, such as crossing formations which were not considered or failure to exactly locate faults and contacts between formations, generates lost time, economical loss and safety hazards during construction.

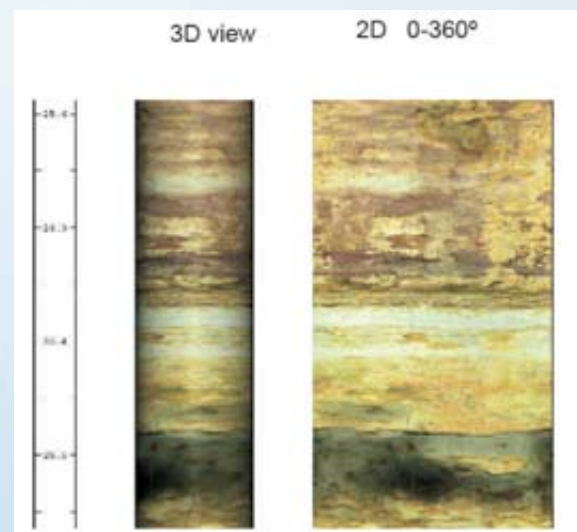
To understand the ground, detect heterogeneities, discontinuities, the presence of water, etc, a new method was developed for geotechnical characterisation which is also valid at great depths, based on

technologies in existence in the oil drilling industry. The new methodology is capable of providing direct and continuous in-situ measurements, necessary for characterising the structural, compositional and geomechanical properties of the ground at depths of up to several thousand metres by means of boreholes.

This methodology uses a modular probe which in turn combines different probes to enable complete tests to be carried out in a single operation, as it is capable of making an in-situ and continuous record of oriented images and petrophysical and geomechanical properties. Depending on the type of borehole from which data is to be taken, with or without casing, whether it has water or not, different combinations of geophysical probes are used (optical or acoustic televiewer, gamma rays, radar, etc).



Assembled probes and the connection system.



An example of the result obtained on passing the optical probe through a sedimentary rock with alternating layers with different properties.

4D visual

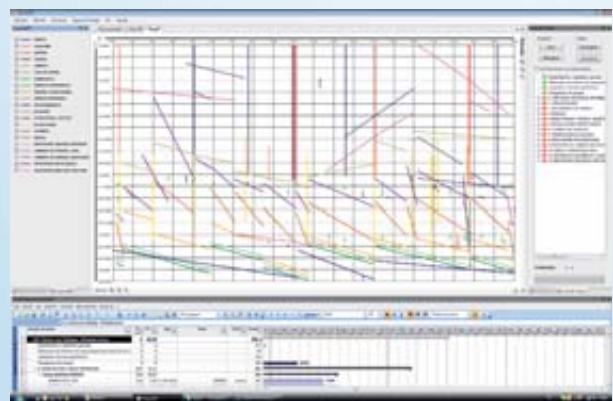
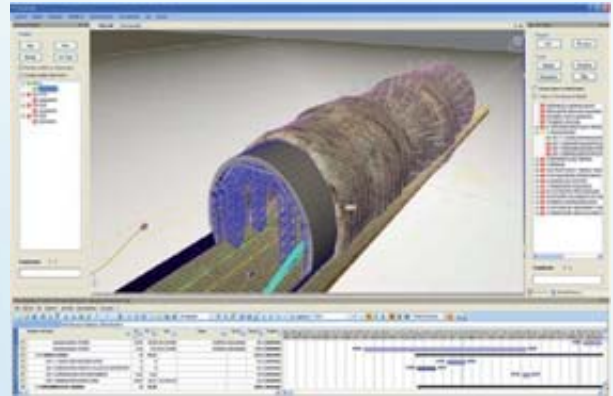
For planning of linear works by means of the use of space-time diagrams, a program has been developed which feeds bar charts created from MS Project and enables simulations of work to be made in 4D, i.e. 3D displays for different work scenarios and their variation over time. The production of the space-time diagrams from the bar charts takes place instantly and automatically, greatly reducing the time needed to prepare them.

This system offers the advantage of being able to plan directly on the space-time diagram, seeing in real time how the modification of one of the planned activities affects the whole work. This allows the redesign of the activities in real time and organisation of the resources to enable the optimisation of the execution period of the work, with the consequent economic savings this can represent.

Fire resistant dual layer voussoir

The construction of tunnels with tunnelling machines is associated with the use of prefabricated concrete segments as structural support for the tunnel, and new requirements relating to the behaviour of these segments arise every day. Among these requirements is resistance to fire. Current solutions to resist the action of fire consist of the manufacture of a single layer segment resistant to fire or the in-situ application of a protective layer on a conventional segment.

As an alternative solution, a segment has been developed which is made up of two layers - a thick first structural layer to meet the requirements for resistance to the loads and for durability and a thin second finishing layer to complement its behaviour against fire. The manufacture of the two layers takes place in the factory, with the introduction of some modifications to the production process with respect to that used for the conventional segment.

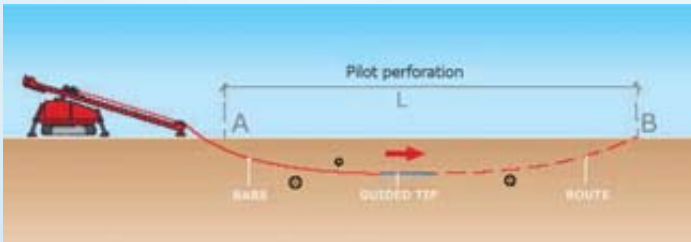


4D planning system.



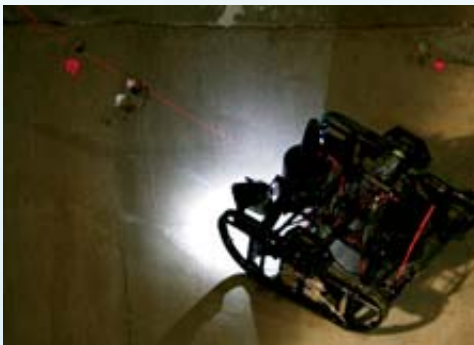
Dual layer segment during one of the project tests.

5. Commitment to Research, Development and Innovation



Injection in tunnels with installed sleeve tubes with directional drilling

The construction of underground works generates vertical movements of the ground at the surface which can affect subsequent construction. One of the techniques employed to minimise this effect is to inject the ground from vertical shafts in a controlled manner with a material in a fluid form, usually cement slurry, so improving the mechanical properties of the ground and correcting settling. However, there are problems in the application of this method when the work is carried out in urban areas, hence horizontal directional drilling has been developed along with injection of the ground with sleeve tubes so that it is not necessary to excavate shafts.



Robot inspecting the lining segments of a tunnel and examples of the images recorded by the cameras.

Introduction of robots for tunnel inspection and maintenance

Tunnels are planned and built with service lives which sometimes reach 100 years. However, their life cycle can be reduced for various reasons. Inspection and maintenance operations in tunnels need to be carried out in short periods of time (during the night), in limited spaces and under difficult working conditions for the workers who perform them. To facilitate the carrying out of inspections, a robot guided by remote control was developed to perform rapid inspections in real time of surface defects in the structure in areas where access is difficult. The robot is capable of being moved in any direction, included on inverted surfaces, and thanks to the system of lights and cameras with which it is equipped, it can carry out visual inspection of the tunnel surface.

Once damage has been detected, it needs to be repaired. For this purpose, a robot has been developed, mounted on a small flat bed lorry in order to optimise some repair operations within the tunnel while minimising disturbance to traffic. The system of cameras with which it is equipped send images in real time to the control post, from where the operator controls all the necessary operations. The system is equipped with control software to enable the operator to mark the repair zone such that the robot automatically follows the path indicated.



Preparation of the robot inside the tunnel and operating with traffic.

Environment

Within the Environment area, R+D+i investment for the year was focused on improving techniques for treating waste and water, promoting the technology observatory for Urban Solid Waste with maximum exploitation and minimum dumping (OTERSU +- Project) and developing innovations in rubbish collection vehicles and systems, as well as projects on the optimisation of sludge treatment in waste water treatment stations.

In the field of Industrial Research and Technology Development, numerous projects are being carried out, among which the Technology Observatory for Urban Solid Waste with maximum exploitation and minimum dumping (OTERSU+- Project).

From 2006 to 2009, the objective of this €20 million project backed by the Spanish Centre for the Development of Industrial Technology (CDTI) is to increase the amount of recoverable by-products arising from the waste delivered to the treatment centre. For this purpose, processes which will include all possible treatment alternatives are subject to research.

This is a project for which a consortium of 9 organisations was formed. The consortium is led by Urbaser, the head of the ACS Group's Environment area, and each of the organisations has entered into a cooperation agreement with Public Research Bodies for a term of four years in relation to the following lines of research: pre-treatment, biomethanization, recovery, composting, control system, environmental control and diffusion.

A total of €5.17 million were invested in R+D+i projects in the Environment area in 2009.



5. Commitment to Research, Development and Innovation

Industrial Services and Energy

Within the Industrial Services and Energy area, R+D+i investment focuses on the development of thermal solar energy with heat storage and manageability, on creating solutions for improving road safety, on developing off-shore wind power, on research in the area of advanced systems for mobility management and winter road administration and finally on improving current techniques for carrying out highly complex industrial assembly operations.

The most noteworthy projects in 2009 were the following:

The total investment in R+D+i in Industrial Services and Energy amounted to €14.27 million in 2009.



Thermal Solar Energy

This is centred on the development of two projects for the capture, transformation, testing and monitoring of thermal solar energy and on the development of new technological solutions for thermal solar power plants.

In both cases the final objective of the project is to develop the technical and operational capability of the ACS Group's thermal solar power plants, where the Group is currently a world leader in technology development, with total investment of over €1,400 million.

In the case of the project to develop new technological solutions for thermal solar power plants, the main objective is to equip a thermal solar plant, with an additional thermal storage system, with the advanced technology to make its electricity generation more efficient. This innovation is also an ecological and sustainable alternative aimed at offering resources for electricity production on a large scale from solar energy, without depending on other non-renewable sources such as natural gas or other types of fossil fuels, so contributing to reducing CO₂ emissions.

The intention in this project is to design and develop a new molten salt tank system, which is completely new, combining in a single tank the two housings for the molten salts for thermal energy storage – hot and cold – enabling the period for energy production from thermal solar plants to be extended. On the other hand, the aim is to analyse the performance of a 50 MW parabolic trough collector (PTC) solar plant by means of a complex study replacing, in one case, the boiler with a gas turbine and, in another, implementing a biomass boiler as thermal support taking into account various possible configurations for this with its respective uses and functional objectives. In parallel is the assessment of the basic configuration and functional evaluation of the installation of a biomass boiler within a thermal solar plant, creating a hybrid solar-biomass plant, unique in the renewable energies sector, which fits within the limits laid down in Spanish Royal Decree 661/2007 of 25 May which regulates electricity production activities under the special regime.

In the case of the project for development of the technical and operational capacity of the thermal solar power plants, its main objective is the technological development of a new system for capture, transformation, testing and monitoring of thermal solar energy. On one hand, a new parabolic trough collector, the Senertrough, has been designed, developed and tested. This provides substantial structural

and performance improvements to the solar field. On the other hand, a mobile unit has been developed, not available on the market, to permit monitoring and testing of any loop made up of parabolic trough collectors in a position to be operated.

Parabolic trough collector technology basically consists of a field made up of solar collectors which focus the solar radiation received onto an absorber tube located at the focal point of the parabola. A heat transfer fluid is made to pass through this tube, where it is heated until it reaches the operating temperature. The heat collected in this fluid can be used for various purposes: to generate steam for a conventional Rankine cycle and so produce electricity, for direct generation of steam to support industrial processes, to supply sanitary hot water, etc.

It is worth pointing out that the solar field (made up of the parabolic trough collectors) for a 50 MW plant represent approximately 60% of the total cost of the power plant and can have 510,120 m² of mirrors, 92,000 m of absorber tubes and 20,000 tons of steel. This is the case for the Andasol 1 plant which has been operating in Granada since 2008.

So, the design and development of a new parabolic trough collector system through the application of the scientific and technical knowledge acquired from Andasol I will enable the economic impact of the solar field on the project to be reduced thanks, mainly, to a substantial increase in solar field performance. This fact shows the commitment of Cobra and the ACS Group to sustainable development, contributing to this with strategic policies such as those initiated with Andasol, helping, by means of research in this area of renewable energies, to reduce CO₂ emissions to the atmosphere by millions of tons. It needs to be borne in mind that a single 50 MW plant will prevent the emission of tens of thousands of tons of carbon dioxide per year, supplying the grid with electricity without fluctuations or interruptions.

From the technical point of view, the main objective of this project is to validate the design of the Senertrough parabolic trough collector by means of the development, in collaboration with Sener, of a first, non-commercial prototype, the main aim of which will be to confirm and improve these new technologies for installation in future commercial plants to produce electricity from solar energy.

5. Commitment to Research, Development and Innovation



Also related with renewable energies, Dragados Offshore has carried out a project to study the viability of designing, building and installing wind farms off-shore, with the main objective of defining a new line of business considering the production of future wind farms in the sea, bearing in mind the technical, environmental, financial and operational characteristics from design to commissioning.

In the area of urban mobility, covered by the Etra Group, the project for management of advanced mobility systems stands out. This is a new system which integrates and improves the means of capturing data on road network status, as well as those which permit interaction between the vehicles and the infrastructure, which have led to the transcending of old ideas of mere traffic or transport control, replacing them with integral management of mobility, in which the key lies not so much in achieving rapid movement of vehicles as in obtaining safe movement of people which is sustainable from the environmental viewpoint.

The Etra Group carries out projects in the field of self-guided vehicles –with driver support systems which can even replace the driver if necessary– cooperative sensors which, for example, interact with each other intelligently to assess the traffic situation more precisely, or integral systems for mobility management, in which the interaction between the vehicles and the intelligent infrastructure is used to manage the flow of vehicles and travellers over the road network in a more efficient manner.

In turn, SICE carries out projects combining information technology with road safety, such as with the Guide Project for example –automatic guiding of public transport vehicles by means of multimodal perception to improve efficiency– the purpose of which is to construct a system for positioning and automated driving of public



transport vehicles. This is based on multimodal perception of the environment, covering both information provided by the infrastructure and the data collected by the vehicles themselves. The final objective is to optimise their efficiency, with this being understood to mean its various facets of energy consumption, environmental impact, safety and quality of service of public transport.





6. Commitment to the Natural Environment

79%

of the Group's production takes place in companies certified in accordance with ISO 14001

58.5%

recovery rate for Construction waste in 2009, 20.9 percentage points higher than in 2008

150 MW

of power installed in 2009. The ACS Group is pioneering the development of thermal solar plants.



The ACS Group has an impact on the environment which is inherent in the characteristics of its activity. The development of infrastructures leads to changes resulting from the use of materials, fuels and energy (both at the time of construction and over the life of the various infrastructures) or from the generation of waste. It may also give rise to visual effects and effects on the landscape and all of these impacts may be either positive or negative.



Given the commitment of ACS to the natural environment, it undertakes specific measures in relation to each of the Group's activities in order to improve overall results, decrease risks and preserve, reuse and reduce the resources employed.

"Everyone has the right to enjoy an environment appropriate for the development of the person, and the duty to preserve it".

The axiom above is the point of departure for ACS Group activities. To monitor these activities, an environmental policy has been established, the criteria for which are understood, shared and put into practice by all the Group companies.

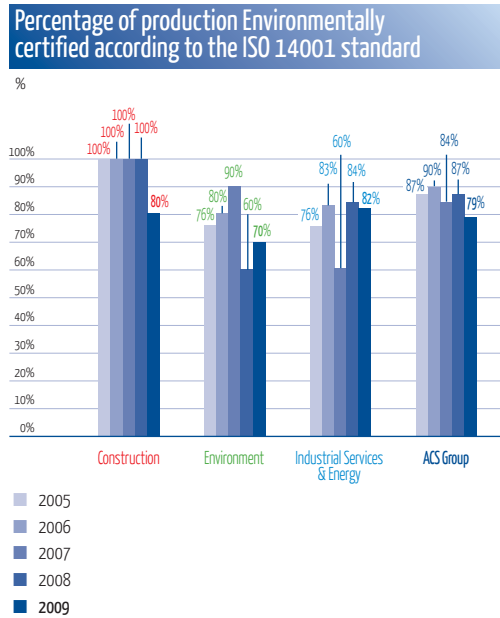
At the different work centres, the ACS Group's objectives are laid down in the Environmental Management Programme, which includes the goals to be met, the measures required, the resources necessary, the responsible parties and the deadlines.

The ACS Group carried out 444 environmental audits during 2009, complementing its continuous process for certification and control. During the year 1,398 environmental incidents occurred with different impact levels, but only 28 of these involved the origination of minor sanctioning administrative proceedings, resulting in a total value of sanctions of €106,931.

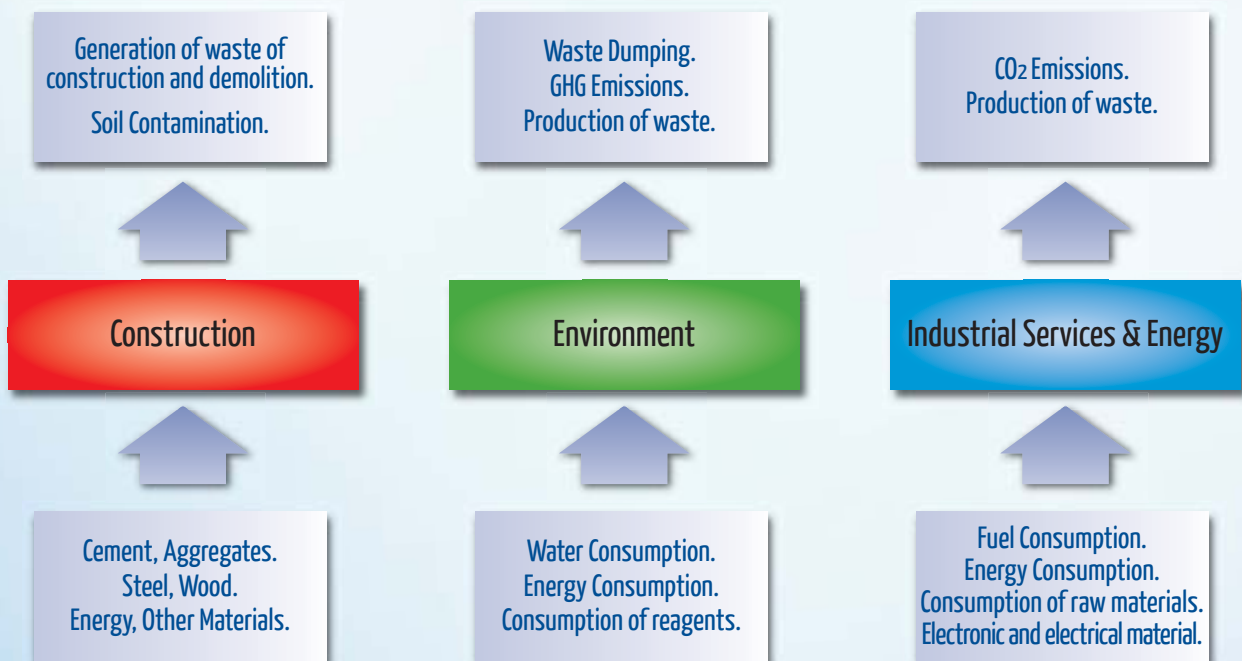


Currently, 79% of the Group's production takes place in companies that are environmentally certified in accordance with the ISO 14001 standard.

6. Commitment to the Natural Environment



Main impacts of ACS Group activities



The results of the combined analysis of the different activities and an aggregated summary of the environmental indicators corresponding to 2009 are as follows:

Area of Activity	Construction	Environment	Industrial Services & Energy	ACS Group
% of total sales 2009	25%	17%	42%	84%
Materials used	Cement, steel, aggregates, bitumen, chemical products, wood	Solid urban waste, industrial waste, hospital waste, mineral oil, gas neutralization products, acids, water	Cables, concrete, iron, steel, gas, diesel, wood, lighting, paper, computer equipment, floated concrete, aluminum, reflective materials, copper, aggregates, electronic equipment, electrical and plastics	
Consumption of energy broken down by primary source				
Petrol + diesel consumption (million litres)	16.2	35.8	23.0	75.1
Natural gas consumption (m ³)	213,620	5,111,096	38,870	5,363,585
Electricity consumption (GWh)	51	110	30	191
Other consumptions (toe)	369	1,621	0	1,991
Total (toe)	21,754	53,303	26,496	101,553
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Water consumption				
Obtained from the public mains (m ³)	808,101	1,833,736	108,684	2,750,521
Obtenida de otras fuentes (m ³)	632,391	420,588	3,951	1,056,930
Total (m³)	1,440,492	2,254,324	112,636	3,807,451
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Waste water dumped ⁽¹⁾				
To the public network (m ³)	Not available	1,039,150	93,622	1,132,772
Drainage to the sea or rivers/lakes (m ³)	Not available	14,491	1,568	16,059
Total (m³)	Not available	1,053,641	95,190	1,148,831
<i>% of total ACS Group sales represented by the data obtained</i>	<i>0%</i>	<i>12%</i>	<i>34%</i>	<i>46%</i>
Total direct greenhouse gas emissions (t CO ₂)	37,000	8,002,123	31,137	8,070,259
Total indirect greenhouse gas emissions (t CO ₂)	15,008	32,707	8,996	56,712
Total direct and indirect greenhouse gas emissions (t CO₂)	52,008	8,034,830	40,133	8,126,971
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Other significant emissions to the air (already included in direct emissions)				
NO _x (t)	0.10	360.3	0.00	360.3
SO _x (t)	0.20	0.6	0.00	0.8
Particles (t)	0.00	2.4	0.00	2.4
Other gases (t)	0.40	0.0	0.00	0.4
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>8%</i>	<i>28%</i>	<i>61%</i>
Savings of greenhouse gas emissions (t)	0	4,095,935	2,414,034	6,509,969
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Non-hazardous waste managed	Surplus land excavation and CDR (rubble, wood, plastics, paper and cardboard and metals)	Waste from treatment of urban waste	Paper, cardboard, electronic waste, scrap, municipal waste	
Total (t)	1,099,375	29,209	33,104	1,161,688
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Hazardous waste managed (t)	2,251	8,501	7,436	18,188
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>
Percentage of projects which are rated non-financial, such as environmental (%)	77%	0%	7%	27%
<i>% of total ACS Group sales represented by the data obtained</i>	<i>25%</i>	<i>17%</i>	<i>42%</i>	<i>84%</i>

(1) Not included treated water in the sewage treatment plants

6. Commitment to the Natural Environment

Construction

The ACS Group actively complies with its environmental protection obligations in all its construction activity projects. For this reason, the conservation of natural resources and proceeding in an environmentally responsible manner are considered to be an integral part of its activity.

It is aware of the effect construction activity has on the natural environment. Although this effect is temporary in nature, it can affect its different elements: water, atmosphere, soil, natural setting, biodiversity, etc.

For Dragados, ACS' lead company in the construction area and the subject of this report, the main objective is to identify the environmental impacts of its projects and activities at an early stage and to eliminate or minimise their effects. To do this, its companies have environmental management systems built into their general management systems. Consequently, a set of preventive measures or Good Practices are implemented, aimed at the sustainability of the environment and compliance with legal requirements.

Among the main effects from the sector, it is worth highlighting the following:

Use of natural resources

Construction activity faces the challenge of optimising consumption of resources, avoiding inefficiency. In addition, through appropriate recovery of the waste generated in the work, the contribution of new resources can be reduced.

Atmospheric emissions

In addition to emissions of dust and particles originating in the works as a consequence of a series of activities, amongst which the use of machinery and demolition stand out, there are the greenhouse gas emissions resulting from the combustion of energy resources, so closely linked to climate change. In this regard, a series of actions are being taken to measure and control both direct and indirect emissions in the interests of setting measures for their reduction.

Generation of waste

The ACS Group's companies have been effectively developing policies aimed at reducing and correctly managing waste originating in the work.

Biodiversity

Construction activity also has an impact on biotic factors such as the flora or fauna present in the setting of the work. For this reason, the conservation of the flora and fauna is another of the environmental principles in the planning and preventive measures adopted in the work. These measures are based on physical protection, transplanting or transfer, as well as considering life cycles in activity planning.



Environmental performance Main environmental indicators²

Environmental indicators provide information which enables quantitative assessment of the main parameters which reflect the effects of construction activity, showing the repercussions of the measures implemented, as well as their evolution over time.

The main environmental indicators are: Consumption of natural resources (water and energy according to its different sources: electricity, fossil fuels, LPG, natural gas, etc), as well as associated greenhouse gas emissions and waste management.

² The data referred to in this section correspond to Dragados S.A. The data for Construction in the aggregate table of environmental indicators, which heads ACS's Commitment to the Natural Environment, include figures from Dragados, Geocisa and Vías y Construcciones S.A.



6. Commitment to the Natural Environment

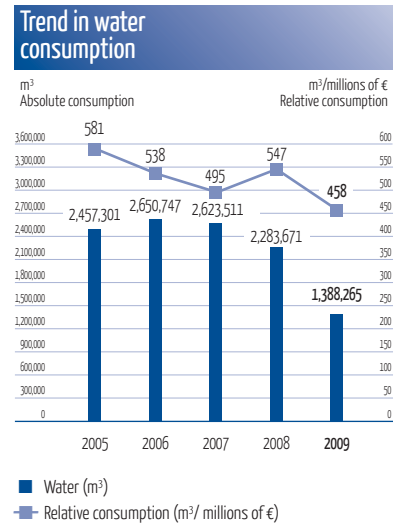
Consumption indicators

Water consumption

In the case of water, and to analyse the trends, relative consumption was obtained based on total annual production.

Trend in water consumption	2005	2006	2007	2008	2009
Water (m ³)	2,457,301	2,650,747	2,623,511	2,283,671	1,388,265
Relative consumption (m ³ / millions of €)	581	538	495	547	458

As can be seen, the ratio or relative consumption continues on a downward trend.

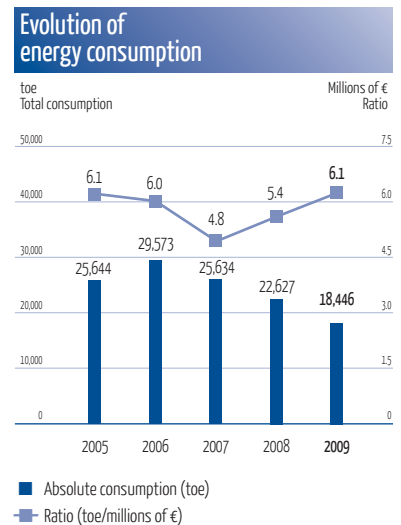


Energy consumption

To analyse energy consumption, the amounts consumed from different energy sources have been converted into a common unit so that it is possible to compare the trends based on total annual production. The conversion factors employed are those normally used by both national and regional public authorities in energy plans.

Trend in energy consumption	2005	2006	2007	2008	2009
Totals (toe)	25,644	29,573	25,634	22,627	18,446
Ratio (toe/ millions of €)	6.1	6.0	4.8	5.4	6.1

As can be seen, total consumption fell, as a consequence of the reduction in construction activity.



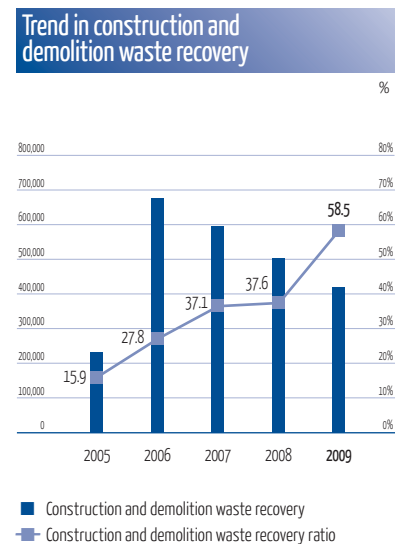
Waste indicators

Below is a table of the indicators corresponding to the types of waste which are most common in construction (construction and demolition waste, surplus soils from excavation) in which the results of the measures taken can be appreciated, as can the trends over time.

The favourable trend in the management of construction and demolition waste has continued, reaching a recovery rate of over 58%.

Construction and demolition waste	2005	2006	2007	2008	2009
Recovery (Reuse + Recycled)	15.9%	27.8%	37.1%	37.6%	58.5%
Reuse relative to total produced	7.8%	17.2%	20.6%	14.1%	20.2%
Recycling relative to total produced	8.2%	10.6%	16.6%	23.5%	38.3%
Deposited at dump sites	84.1%	72.2%	62.9%	62.4%	41.5%

Excavated soil	2005	2006	2007	2008	2009
Reuse relative to total produced	72.0%	68.6%	79.6%	69.2%	70.5%
At own site	86.3%	63.8%	54.3%	64.9%	64.8%
At other sites	7.8%	12.3%	19.5%	10.3%	5.6%
Restoration of degraded areas	5.9%	23.9%	26.2%	24.9%	29.6%
Deposited at dump sites	28.4%	31.4%	20.4%	30.8%	29.5%
Reduction relative to projected amounts	5.8%	3.6%	2.3%	4.5%	0.3%



As can be seen, the favourable trend in optimising the management of construction and demolition waste has been maintained, with a continuing increase year on year in the recovery rate.

In accordance with applicable environmental law, the management of waste is completed with the separation, storage and treatment by an authorised manager or Integrated Waste Management System of the remaining hazardous or specifically regulated waste produced at the various work centres.

In 2009 the amount of hazardous waste managed amounted to 1,889.24 tons.



6. Commitment to the Natural Environment

Emissions indicators

CO₂ emissions

The calculation of equivalent CO₂ emissions was carried out by following the criteria laid down by WRI/WBSCD, by means of the GHG Protocol: "Indirect CO₂ Emissions from the Consumption of Purchased Electricity, Heat, and/or Steam". Calculation worksheets (January 2007) v 1.2.

As a consequence they have been divided into:

Scope 1: Direct GHG emissions

Direct emissions are associated with sources belonging to or controlled by the company. For example, emissions from combustion in machinery, vehicles, boilers, etc belonging to or controlled by the company.

Direct GHG Emissions (Scope 1)	2005	2006	2007	2008	2009
Total (t CO ₂)	56,469	73,880	59,097	50,844	36,999
Ratio (t CO ₂ /millions of €)	13.3	15.0	11.2	12.2	12.2

Scope 2: Indirect GHG emissions associated with electricity

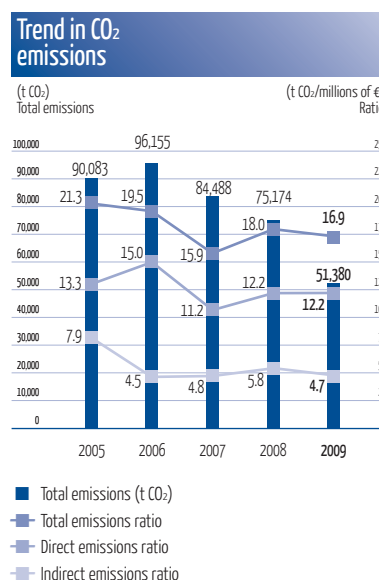
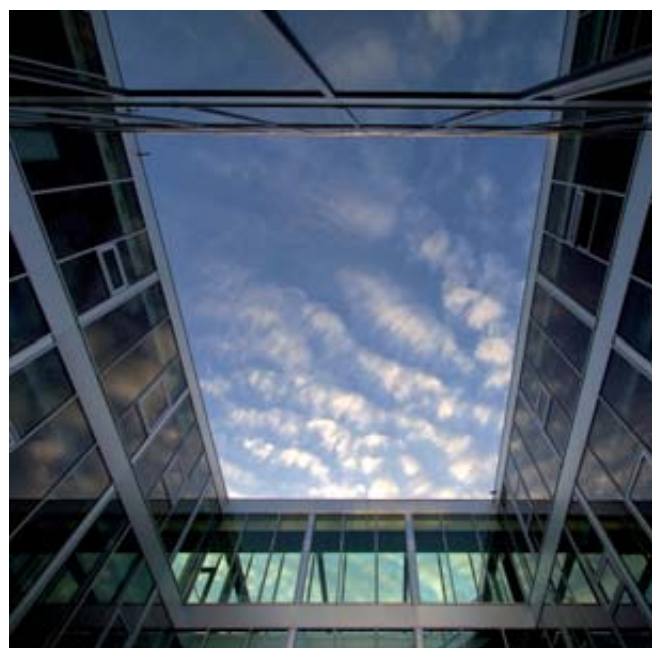
Included in indirect emissions are those corresponding to the generation of electricity purchased and consumed by the company.

Purchased electricity is defined as electricity bought or brought into the organisational limits of the company. Scope 2 emissions take place physically in the plant where the electricity is generated.

Indirect GHG emissions (Scope 2)	2005	2006	2007	2008	2009
Total (t CO ₂)	33,614	22,274	25,392	24,329	14,380
Ratio (t CO ₂ /millions of €)	7.9	4.5	4.8	5.8	4.7

Total GHG Emissions (Scope 1+ Scope 2)	2005	2006	2007	2008	2009
Total (t CO ₂)	90,083	96,155	84,488	75,174	51,380
Ratio (t CO ₂ /millions of €)	21.3	19.5	15.9	18.0	16.9

It can be seen that total emissions fell. This was as a consequence of decreased construction activity. However, the ratio of emissions continues the downward trend.



Scope 3: Other indirect emissions

Scope 3 emissions are the consequence of the company's activities, but they occur in sources which neither belong to the company nor are controlled by it.

Work started in 2009 to establish a methodology for data collection to calculate Scope 3 emissions in the future.

Noteworthy initiatives in 2009

- Actions aimed at recycling construction and demolition wastes resulted in a level of 58.56 % being achieved.
- The adoption of preventive actions in works to reduce the impacts in the urban environment.
- Environmental training, as regards construction and demolition waste, for middle managers (Heads and Supervisors).

The following awards and acknowledgements were also received in the environmental field in 2009:

Finalist in the "Best company environmental performance 2009" contest, organised by AENA in Madrid-Barajas airport.



Monitoring of the achievement of 2008 Objectives in 2009	2008 data	2009 data	Outcome
To increase recovery of construction and demolition waste to above 45% of the total	37.6%	58.5%	Achieved
Campaign to minimise or prevent effects on the urban environment	A variety of initiatives are being implemented, such as the establishment of alternative routes when pavements or roads are occupied, protection and signing of occupied zones and preventing dirt on roads and pavements.		Achieved

Note: It has been noted that 1,718,810 tons of non-hazardous waste were produced in 2008 and this figure corrects the 43,479 tons reported.

Objectives for 2010

- Recovery of construction and demolition waste over 60 %.
- Begin calculation of Scope 3 GHG emissions. First phase: Emissions from travel for work and entry to the work site.

Case Study, Construction: La Breña II Dam



The La Breña II reservoir, with storage capacity of 823 hm³, was created to meet a key need in the development of the Guadalquivir river basin: security of water supply.

The objective of the hydraulic complex for the new La Breña dam, known as La Breña II, is to complete the regulation of the river Guadiato and to increase that of the middle to lower stretch of the river Guadalquivir by means of the diversion of its waters and pumping of these to the new dam using a future pumping station.

This approach is due to the impossibility of building new large dams in the Guadalquivir itself due to the enormous effects which would be caused. On the other hand, the regulating effect of small dams is not close to being sufficient to adequately regulate the aforementioned stretch of river. The sole remaining alternative was the possibility of using its tributaries and creating dams close to the confluence to which to pump the Guadalquivir's surplus winter water for release during periods of drought, when the greatest demands for supply and irrigation occur in the lower basin.

Hence, the La Breña II dam has the clear objective of providing a guarantee of flow, which cannot be subject to the ups and downs in the climate.

As such, the works were carried out near Almodóvar del Río in the province of Cordova to create the La Breña II reservoir which, with somewhat more than 1,400,000 m³ of compacted concrete and at 119 m high, is the dam with the greatest volume and height of its type to date in Europe.

The action not only considered the construction of a very important hydraulic structure for storage and regulation, but also **included an extremely full set of compensatory and corrective measures with the objective of strengthening the natural system for it to absorb the impacts from the construction of the dam.**

The construction of the La Breña II dam represented a challenge to man's ability to surpass himself, in that 70 years after the first La Breña dam was built, the height has been doubled and storage capacity multiplied by 8, **incorporating the environmental aspects which are of absolute value in the 21st century with the compensatory measures.**

Considered by the specialised press as **one of the most important works in the last quarter century**, the La Breña II dam will guarantee the water needed in Andalusia, so that its fertile fields bear fruit and its towns are supplied, permitting sustainable development and a heritage of progress.

Description of the project

Exploitation of the reservoir required the following actions:

Dam: of roll compacted concrete (RCC). With its 119 m in height and volume of 1.4×10^9 m³, it is the largest RCC dam in Europe.

Reservoir: with a capacity of 823 hm³ and an occupied surface area of 2,020 hectares. The current reservoir occupies a surface area of 600 hectares and has a volume of stored water of 103 hm³.

Weir in the Guadalquivir and pumping station required for filling the new dam: this weir will have its sill at a height of 71 metres.

The pumping station will be located at the confluence of the two rivers and will lift a flow rate of 50 m³/s through pressure pipe line.

New roads and subsidiary works: The access road to the new dam is based on the existing road. It starts from the current crossing with the C-431 and runs along the left bank until it reaches the new crest elevation. Other replaced roads were:

- The road around the reservoir, which needed a new bridge over the river Cabrilla. The extension of this road also required a new bridge over the river Guadiato.
- Road for access to the weir on the Guadalquivir, which runs along the left bank, taking advantage of the existing road network.

Summary of the environmental impact study

The reservoir is located on lands catalogued as the **Sierra de Hornachuelos Natural Park**. The status of these valleys as a Natural Park imposes some limitations on the uses to be made of these zones. Several habitats and species covered by European Directive 92/43/EEC, of 21 May 1992, concerning the conservation of natural habitats and of wild fauna and flora, are located in the area.



Author: Ex-Situ Iberian Lynx Conservation Programme.

The vegetation is made up of evergreen formations, dominated by wild **olive trees, with kermes oaks and holm oaks**. In the zones with a high thermicity index, formations of **mastics** are found, whilst on the slopes of the reservoir with better water balance the presence of **gall-oaks and hackberries** is seen. The upper slopes of the future tail, in the valley of the river Guadiato, have stands of **stone pine and chestnut**. As scrubland vegetation there are **rock roses** (white-leaved and gum rock roses) and **viburnum and strawberry tree scrub**.

Outstanding as regards the fauna are the **Iberian lynx, wild cat, ichneumon, otter, Bonelli's eagle, loach and linnet**. There is high hunting interest in the area.

It is included a set of compensatory and corrective measures in order to strengthen the natural system.



Case Study, Construction: La Breña II Dam

Description of environmental actions

Great efforts were made related to environmental actions in the execution of the La Breña II Dam. These were focused on **three different aspects**:

- Firstly, to limit the environmental impact of the works **during the construction** of the La Breña II Dam, **a wide range of corrective and preventive measures** were taken, under strict control and vigilance of the environmental determining factors indicated in the Environmental Impact Statement. As such, aspects related with the following were covered:

Protection of natural values



Air quality



Water quality



Soil protection



Waste management



Protection of vegetation



Protection of fauna



Historic/cultural heritage



- On the other hand, following the specifications in the Environmental Impact Statement, a **Land Compensation and Corrective Measure Project** was carried out. This covered over 2,000 hectares, with actions related to the fauna, the flora and the infrastructures, **including a thorough scientific follow up with 17 studies** to ensure rigour in the measures implemented. These will continue for a period of 20 years to guarantee the success of the actions.
- Finally, actions of **a more general scope** were undertaken, some of these related to the specifications imposed by the European Union, which checks their fulfilment periodically through a Technical Monitoring Group. These cover aspects of management for the whole river basin, such as water saving and modernisation of irrigation.

Also noteworthy within these environmental actions are the efforts undertaken in **environmental and social dissemination actions**, both at the time and permanent, in the form of content within the scope of the work involving education, an aspect which increases the effectiveness of the measures carried out and gives them greater meaning.

Compensatory measures for La Breña II

The project for compensation for land affected and corrective measures for La Breña II was prepared to fulfil the requirements imposed in the Environmental Impact Statement and so comply with the EU Directives 79/409 (HABITATS) and 92/43 (Special Protection Zones for Birds).

For land compensation a Compensatory Measures project was drawn up, endorsed by scientific teams, in which a broad range of measures were laid out, aimed at the undertaking of environmental studies and actions in the setting of the new reservoir. The **Strategy for the Conservation of the Iberian Lynx** was particularly taken into account in the preparation of the project.

To ensure the technical rigour and the effectiveness of the actions taken in the framework of the compensatory measures, scientific groups were involved, such as those from the universities of Cordova, Seville, Pablo Olavide and the Institute of Marine Sciences. On the other hand, the Doñana Biological Station and the Spanish Research Council (CSIC) coordinated and carried out studies related to mammals, amphibians and birds.

The decision was taken to design the compensatory measures in independent portions in the La Breña II project, instead of choosing a single plot of a larger size. This enables a wider diversity of habitats to be covered as well as obtaining an indirect positive effect on the neighbouring zones. The final result is a set of islands which will act as an ecological corridor for many species and cover a total area of 2,134 hectares, much more than the 625 hectares of the Natural Park which may come to be covered by the waters at the maximum levels of the reservoir.

The objectives of the actions have focused on the fauna identified as highest priority, as well as improvement of the environment and of the cover of vegetation in the selected plots. This priority was defined according to the intrinsic ecological value of these species, as well as due to their value as “umbrella species”, the latter being understood as those whose preservation promotes the conservation of the remaining species in the ecosystem. In addition to these actions, other types of specific works were undertaken, such as research projects, the creation of a botanical garden and an interpretation centre, the restoration of a 14th century flour mill and the adaption of an abandoned stretch of road as part of the Soriana Royal drovers’ road.



Actions with the vegetation

The plant communities present in a habitat are directly related with the fauna in it, as they serve as a refuge and for sustenance, for this reason the work with the vegetation is fundamental to work on the other elements of the environment which depend on it.

In this regard, the main objective was to increase the plant diversity of the plots, not only by increasing the number of species and their distribution, but also by means of improving the structural diversity of the plant formations.

As such over 300,000 plants were planted and protected with stakes and with 68,000 m of fences to preserve them from pressure from cattle and game animals, so setting up a system of wooded islands, fenced along the roads and with groves along the banks of the streams and water courses. As a complement, the existing covering of vegetation was improved by means of forestry works and the creation of fire break areas to prevent the spread of fire should this break out.



Case Study, Construction: La Breña II Dam

Actions with the fauna

Wild rabbit

The wild rabbit can be considered to be the central species in the compensatory measures project for the La Breña II dam due to its role as the base of the food chain for large predators such as the birds of prey and the Iberian lynx. The actions on the rabbits are such that, when the number of lynx reared in captivity rises, they can have an appropriate environment available for possible reintroduction.

For this reason, the final objective of this action was to boost the population of the wild rabbit subspecies called *cuniculus algirus*, native to this zone, so reproductive groups were established in the compensation plots.

Amphibians

On the other hand, actions were taken to improve the habitat for amphibians, based on the creation of new systems of ponds and the adaptation of the existing ones. Since the fencing off of the ponds for protection prevents access to the water by other animals, drinking troughs have been made for these and the cattle present on the farms.



Other species

Actions have also been carried out aimed at otters, birds and bats. The work for otters, which are considered an excellent bio-indicator for the health of river ecosystems, were focused on the construction of zones of refuge and the restoration of the banks of the rivers Guadiatillo and Cabrillas. Over 8,000 nesting boxes for insectivorous birds and nests for birds of prey have been installed, together with signing of wire fences to prevent collisions. For the bats, which play a fundamental role in the control of pests in the cases of insectivorous bats and in the dispersion of seeds in the case of fruit-eating bats- the actions undertaken involved the placement of nest boxes and the making of an artificial tunnel close to the new dam.

Actions to improve infrastructures and management elements

It was essential to intervene and improve the management works, for which auxiliary infrastructures are required, among which are: the installation of drinking troughs and feeding troughs for vertebrates, the placement of headlight reflectors to prevent wild animals being run over, the adaption of passages for amphibians on the roads, the installation of lookout stations for taking censuses of the fauna and for control, dovecots and the construction of cattle grids to prevent livestock from entering the most reserved areas.



Actions in the river Guadiato

In the search for an overall improvement in the environment, cleaning of waste was also carried out in the river course and the banks of the river Guadiato, removing over 20,000 kg of rubbish. Furthermore the banks of the rivers Cabrillas and Guadiatillo, both tributaries of the river Guadiato, were restored, repopulating the most deteriorated stretches with trees and bushes, forming irregular copses and so naturalising their banks.



Laguna de Medina

As a demonstration that the rivers are delimited by basins, but nature is not, environmental restoration was carried out on the banks of the lake known as the Laguna de Medina, consisting of the planting of indigenous species.



Botanical Garden and Interpretation Centre

As a complement to the work carried out in the Sierra de Hornachuelos, a magnificent and welcoming Botanical Garden of almost three hectares has been created on the banks of the river Guadiato, downstream of the new dam. In exploiting the potential of the Botanical Garden, the pre-existing plant formations were reinforced by planting new plants and treating the vegetation in order to create a mosaic divided into themed zones, making it possible to see and appreciate each of the typical plant formation of the Sierra Morena Mediterranean region. But in this space the concept of a traditional botanical garden has been expanded, creating an interpretation centre for the compensatory measures implemented which, due to their location, sensitivity and access, cannot easily be visited by the general public.

As such, a whole infrastructure and contents have been developed to present, approach and lead to the understanding of the various works carried out and the wonderful environmental richness of the region.

Furthermore, a space has been installed for welcoming and informing the public, which functions as an exhibition zone and an outdoor classroom for environmental education.



Flour mill

Within the converted space of the Botanical Garden, completely surrounded by the vegetation, is a wonderful flour mill dating back to the 14th century. It has been fully restored based on a thorough historical and archaeological study. This restoration has even enabled it to be operated as it would have been originally, allowing the visitor to appreciate the historical, archaeological, anthropological and hydraulic values of the whole.

Soriana Royal drovers' road.

Finally, the stretch Soriana Royal drovers' road has been restored. This is one of the Iberian Peninsula's main seasonal migration routes and this stretch connects the La Breña Botanical Garden to the Royal Drovers' Road Park in Almodóvar del Río, bringing the population closer to the new hydraulic and environmental infrastructures so that better knowledge can lead to greater understanding of the efforts required to provide everyone with a standard of living which does not compromise the environment.



6. Commitment to the Natural Environment

Environment

Main environmental performance indicators

The main impacts of this activity are related to the emission of greenhouse gases produced by the fleet of vehicles used for different services, as well as their fuel consumption, to the emission of CO₂ from dumps and to waste generation.

The Environment area is working hard to reduce the consumption of fuel by company or subcontracted fleets of vehicles in the collection of urban solid waste, street cleaning, the transport of passengers and integral maintenance services.

	2005	2006	2007	2008	2009
Number of vehicles	6,066	6,509	5,635	5,481	5,455
Consumption of fuel (millions of litres)	91.1	96.5	96.6	51.8	35.8
CO ₂ Emissions (t)	250,222	264,920	265,147	142,348	98,381

In order to reduce these impacts, policies have been implemented in all areas, from the reduction of fuel consumption and the use of biodiesel fuel in transport, to the reduction of emissions by treating urban solid waste instead of dumping it. On the other hand, it aims to treat the waste generated safely, both for the environment and for individuals.

The ACS Group, through its company Urbaser S.A., is the leader in the management of urban solid waste treatment plants in Spain and has undertaken significant actions abroad. It currently manages the following:

- 44 Urban Solid Waste Pre-Treatment Plants with an installed capacity of 7,026,436 tons/year.
- 8 Energy Recovery Plants with a treatment capacity of 2,076,000 tons/year.
- 19 Plants for the Biomethanization of organic fractions with an installed capacity of 1,361,260 tons/year.
- 50 Composting Plants with an installed capacity of 2,584,568 tons/year.
- 78 Transfer Plants with an installed capacity of 7,004,008 tons/year.
- 48 Controlled Landfills with an installed capacity of 9,179,439 tons/year.
- 14 Waste Dump Degasification Installations which produce 421 Hm³ per year of biogas.

The electrical power installed in the various processes which generate energy from Urban Waste is 205 MW.

The electrical power installed in the various processes which generate energy from Urban Waste is 205 MW.

One of the ACS Group's environmental activities is the treatment and integral management of water as a scarce resource. The ACS Group is responsible for the supply of drinking water to several million people in Spain, Latin America and Morocco and its treatment, and focuses on maximum efficiency and savings in the use of this extremely valuable resource.

It treats over 354 million m³ of water, supplies over 835 million m³ and purifies over 90 million m³ for the equivalent of over 8.8 million inhabitants. For the ACS Group, the sustainable management of water is a key resource in its commitment to the environment and to sustainability.

In total, the Water Section managed:

- 82 Waste Water Purification Plants for 970,000 m³ per day for the equivalent of 5,300,000 inhabitants.
- 17 Sewage operations for the equivalent of 985,000 inhabitants.
- 14 Water Supply facilities for 2,290,000 m³ per day for the equivalent of 910,000 inhabitants.
- 7 Drinking Water Treatment Plants at 250,000 m³ per day for the equivalent of 290,000 inhabitants.
- 7 Analysis and Monitoring Laboratories for the equivalent of 1,400,000 inhabitants.


Monitoring of the achievement of 2008 Objectives in 2009

Objective set in the 2008 report	2008 data	2009 data	Outcome
Increase in savings of equivalent CO ₂ emissions with respect to the baseline solution of dumping	4,090,000 tons.	4,095,935 tons.	Achieved
To reduce electricity consumption by 10%	129 GWh	110.3 GWh	Achieved
Reduction of 5% in non-hazardous waste generated	30,401 tons.	29,209 tons.	Not Achieved (3.9% reduction)

Note: For the preparation of this 2009 Report, the procedures have been revised for the consideration of the scope of the data for waste management attributable to the company. Consequently, and to facilitate the traceability of the data over time, the data provided in the 2008 Report on waste generation and emissions of greenhouse gases generated and prevented as a consequence of waste management activities have been recalculated. The 2008 data, using the new procedure, are: 9.72 million tons of CO₂ emitted; 4.09 million tons of CO₂ saved; 30,401 tons of waste generated by the Environment Area.

Objectives for 2010

- To increase savings of equivalent CO₂ emissions with respect to the baseline solution of dumping.
- To reduce fuel consumption.
- Reduction of 5% in non-hazardous waste generated.



The combination of materials recovery and electricity generation in treatment plants, plus the landfill de-gasification, gave rise to CO₂ savings equivalent to approximately 4,095,935 million tons in 2009.

6. Commitment to the Natural Environment

Industrial Services and Energy

Main environmental performance indicators

The Industrial Services and Energy area has two main areas of impact on the environment: CO₂ emissions and the production of waste. To minimise these impacts, a great deal of effort is dedicated to environmental management year after year. In this respect, managers are not only concerned with the reduction of waste, but also the appropriate treatment and recycling of the waste inevitably produced by the environmental management departments of each of the Group companies.

Industrial Services and Energy continues to make significant efforts to maintain or obtain ISO 14001:2004 environmental certifications in all its companies and carried out 196 environmental audits in 2009.

Among the companies forming part of the Industrial Services and Energy area, the effort made by Dragados Offshore and INITEC in EPC, turnkey and maintenance projects is noteworthy, as is that of the ETRA Group in the area of Control Systems and Semi-Maessa in Specialised Installations and industrial maintenance.

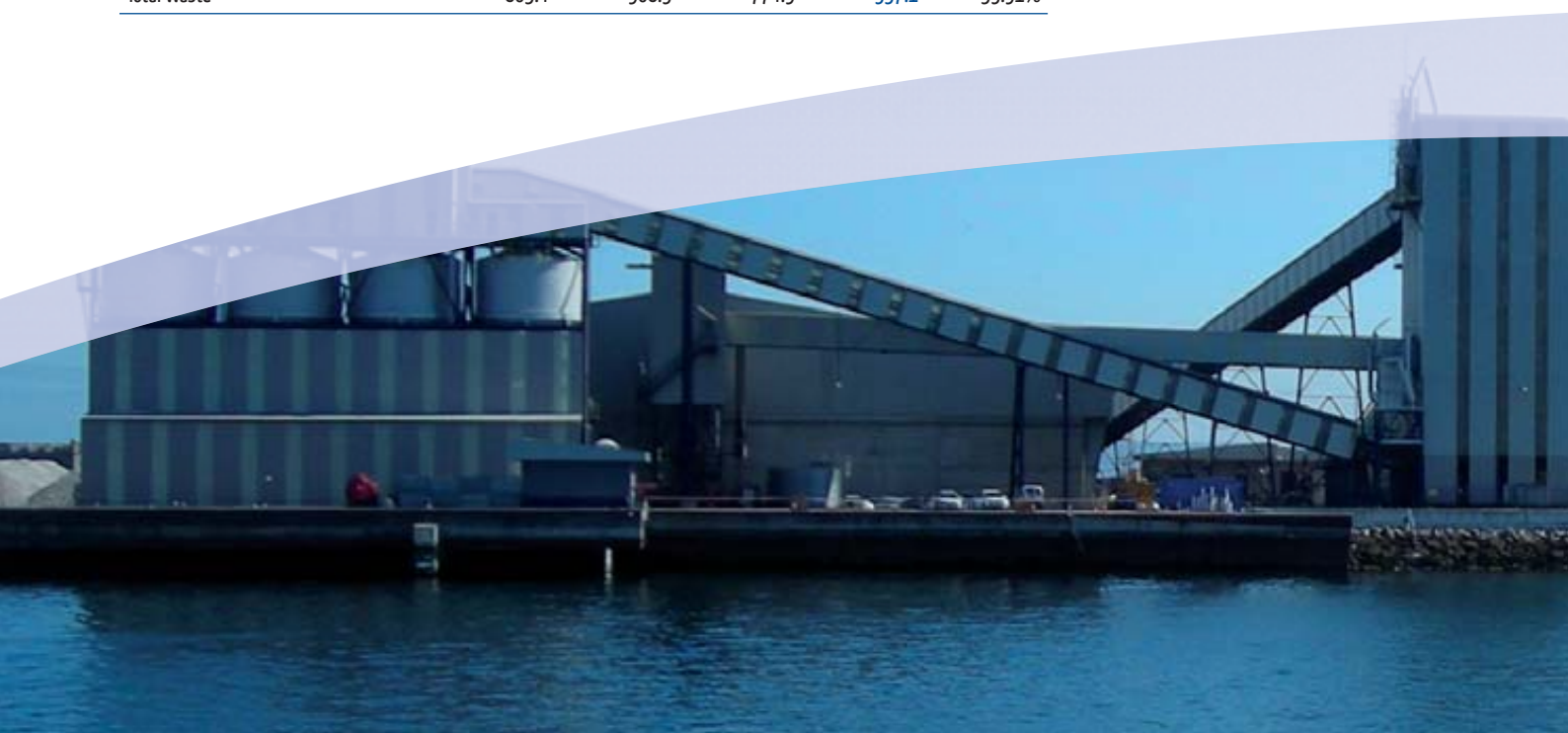
Below are details of the hazardous and non-hazardous waste managed in 2009 in comparison to previous years.

Dragados Offshore	2006	2007	2008	2009	Trend
<small>mt</small>					
Hazardous Waste	43.6	12.8	37.0	1.1	-97.03%
Non-Hazardous Waste	761.9	895.6	737.9	356.0	-51.75%
Total Waste	805.4	908.3	774.9	357.1	-53.91%

Dragados Offshore has an Integrated Quality, Safety and Environmental Management System, the latter following the ISO 14001 standard, all certified by the external organisation Lloyd's Register QA. This system is also implemented in the Tampico (Mexico) plant, being integrated into the Puerto Real plant system.

The current plans as regards the environment during 2009 are:

- Contingency plan for accidental marine contamination, setting out guidelines to be followed in the case of the dumping of hydrocarbons into the sea, as well as the necessary technical and human resources.
- Environment Plan for the "Bay of Cadiz Bridge" Project and the "Castor" Project.
- Emergency plan, identifying possible environmental emergencies within Dragados Offshore S.A.'s facilities.
- Port Installation Protection Plan, approved by the Port Authority.



INITEC Energia establishes an Environmental and Health and Safety Policy shared with its Client and Partners for each turnkey project in progress, with the idea of protecting and spreading concern for conservation of the environment.

The Health and Safety Plans and the Environmental Management Plans are defined, when applicable, in accordance with the regulations, fulfilling the requirements laid down in the Project's Environmental Impact Statement and develop the Environmental Vigilance Programmes for the Project's construction phase, the phase in which INITEC Energia participates.

These Plans comprise the definition and description of the applicable requirements as regards safety and environmental protection, both for INITEC Energia itself and for all the subcontractors, during the carrying out of the activities and provision of the services necessary for the execution of the construction and assembly project.

The Health and Safety Plan and the Environmental Management Plan for each project in progress in 2009 were approved by the Client and were drawn up to their full scope:

- Environmental management plan and health and safety plan for works for desulphurisation for the Los Barrios Thermal Power Station (Cadiz).
- Environmental management plan and health and safety plan for works for desulphurisation for the Litoral Thermal Power Station (Almería).
- Environmental management and health and safety plans for various works for thermal power stations in Egypt; El Tebbin, Nubaria III, Kureimat III and Cairo West 6 and 7.

Requirements have been defined for subcontractors, from the bid phase, enabling raising of awareness, involvement, management and the delimiting of responsibilities as regards safety and environmental aspects relating to the construction phase of the works.

Awareness raising actions were carried out aimed at the aspects related to rational consumption of resources and the need to establish criteria for environmental sustainability. Likewise, measures have been adopted to improve the environmental aspects identified in the head office, involving:

- Improvements related to lighting, electricity consumption and acoustic impact, improvement of environmental conditions in the head office.
- The definition of a model which has enabled quantification of environmental aspects and impacts to be avoided in each of the works being carried out.

Ninety-five percent of INITEC's production is certified according to the ISO 14001 standard and no non-conformities were identified during the audits of environmental management carried out by AENOR in 2009.

In the case of Semi-Maessa, the efforts made to account for Scope 3 CO₂ emissions are noteworthy, as the inferred emissions for business trips are published in its sustainability report. This is an initiative which is being taken up in various ACS Group companies.

Similarly, the ETRA Group has defined a Management System which enables it to ensure that its policy and commitment to the Natural Environment is a reference in the provision of services.



6. Commitment to the Natural Environment

The Environmental Management System established defines the organisational structure, planning of activities, responsibilities, practices, procedures, processes and resources required to do the following:

- Evaluate the impacts of its activity on the environment and minimise them.
- Research, develop and offer its clients innovations which improve environmental conditions.
- Heighten the awareness of its own staff and of those working on its behalf.
- Manage waste correctly and foster the reuse and recycling thereof.

Also, it aims for people and organizations unrelated to the company to have knowledge of its structure, operation and action guidelines based on the criteria and procedures required to guarantee the fulfilment of environmental principles.

The main actions carried out by the ETRA Group in 2009 were aimed at achieving reductions of the company's impact on the environment and increasing staff awareness.

- Actions to reinforce the measures for reducing fuel consumption. Taking into account the problems with fuels and the necessity for their use, an

ambitious objective is to reduce their consumption through more efficient use of vehicles. Already framed within this objective in 2008 and continued in 2009 at other work centres, so exploiting corporate synergies, is the "Efficient Driving" course, carried out in collaboration with AVEN. Work has now been carried out on computer tools to permit monitoring of the results and provide reliable information on consumption independent of the volume of work carried out.

- Reduced consumption of resources (water, electricity): repairs and adaptations have been carried out to the installations in the work centres with the aim of saving energy and eliminating leaks. In the specific case of Electronic Trafic, S.A., water consumption was reduced by 92.17% with the replacement of the air conditioning system installed in the building and a 0.96% reduction in electricity consumption was also achieved.
- Reduced paper consumption: purchase of printers to encourage the production of double-sided documents, reuse of office paper, setting of targets for each work post, staff awareness raising.
- Writing of Manuals of "Good practices for the environment" and their distribution to all personnel. A brief description of each of the environmental aspects is given in this manual, along with how they affect the environment, with data and percentages to raise awareness, and the procedures for correct handling and separation of waste.



ACS takes part in the development of renewable energy. In Spain is the pioneer in the development of thermal solar electricity plants with heat storage decives.

Renewable energy, main figures

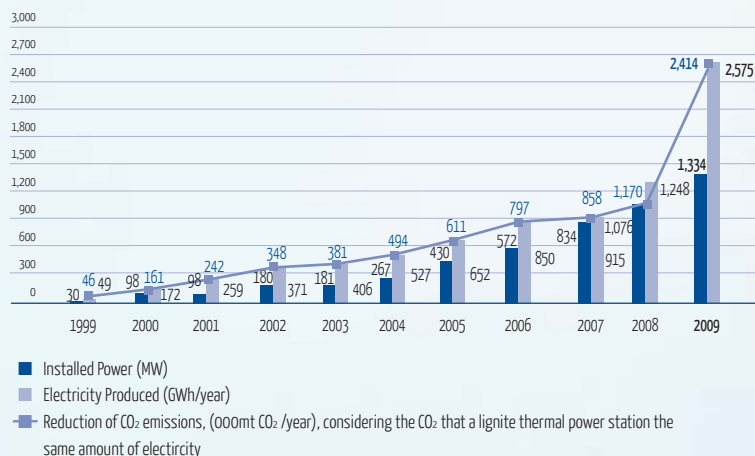
The ACS Group takes part in the operation of 35 wind farms with total installed power of 1,175 MW that generated over 2,465 GWh in 2009 from this renewable energy source.

In addition, the ACS Group is a pioneer in the development of thermal solar electricity generating plants, as it has 150 MW in operation, which generated 110 GWh in 2009.

If this electricity had been produced by a coal-fired power station (e.g. lignite), 2,414,063 tons of CO₂ would have been emitted as a result of the combustion of this mineral.

Four projects are also in the financing or development phase within the area of solar energy: Extresol II and III and Manchasol I and II, with a total installed power of 200 MW.

Renewable energy, main figures



Monitoring of the achievement of 2008 Objectives in 2009:

Objective set in the 2008 report	2008 data	2009 data	Outcome
To reduce consumption of electricity, water and fuels by 3%	46 GWh 145,401 m ³ 21.1 million litres	30.3 GWh 112,636 m ³ 23.0 million litres	Partially Achieved
To make progress in the accounting and control of greenhouse gases	Companies such as SEMI-MAESSA are already accounting for Scope 3 emissions		Achieved
To increase savings in CO ₂ emissions through the development of renewable energies	1,170,000 tons of CO ₂ saved	2,414,034 tons of CO ₂ saved	Achieved

Objectives for 2010

- To reduce consumption of electricity, water and fuels by 3%.
- To make progress in the accounting and control of greenhouse gases.
- To increase savings in CO₂ emissions through the development of renewable energies.

7. Commitment to the Social Environment

38%

proportion of women in the total workforce, 2 percentage points higher than in 2008, that means 54,055 women working in ACS.

82.9%


of clients were satisfied according to the surveys carried out in 2009.

3.7

million euros in investment in social action through the ACS Foundation during 2009.



The ACS Group understands that the respect for the employees is one of the values that excellent companies promote.



*The quality and skills
of the professional
team of the ACS Group
is one of its main
competitive advantages.*

Commitment to ACS Group employees

Principles of ACS' relationship with its employees

Part of the ACS Group's success is based on the skills and quality of its professional team and this is one of its main competitive advantages. Accordingly, the ACS Group maintains its commitment to continually improving their skills, capacities, commitment and motivation, always with the highest attention to work and safety conditions.

For this purpose, the most modern and efficient human resource management techniques are applied in order to retain the best professionals and to foster work safety, in accordance with the following principles:

1. Attracting, retaining and motivating talented individuals.
2. Promoting teamwork and quality control as tools to reinforce the concept of excellence through work well done.
3. Acting quickly, promoting the assumption of responsibilities and minimising bureaucracy.
4. Supporting and increasing training and learning.
5. Innovating with ideas that enable improvement of processes, products and services.

The ACS Group works toward fostering social justice and internationally proclaimed human and labour rights, respecting and protecting the forming of

The ACS Group has a firm commitment to underprivileged groups and particularly the disabled.

labour unions and employees' rights to freedom of association and granting equal opportunities and treatment, without discriminating on the basis of sex, ideology, religion, etc or any other social or individual circumstance or condition.

Additionally, it provides assistance in the training and retraining of employees. It has an employment policy which generates wealth in the areas where it is established and produces links giving rise to positive synergies for the environment. Furthermore, it shows special interest in assuring decent working conditions, promoting health and safety at work.

The ACS group employees 12,010 people who are not Spanish in Spain and carries out its activities in more than 40 countries, in which it promotes the economic and social development of its employees.

Each year the ACS Group's Foundation introduces initiatives, courses and activities in support of reducing architectural barriers and of integrating people with disabilities.

Currently, 2,318 people with disabilities work in ACS. This is an increase of 14.3% compared to the year before and represents over 1.6% of the company's total workforce.

7. Commitment to the Social Environment

Clece's social responsibility activity: towards effective equality

In the framework of the ACS Groups commitment to equality of opportunities and treatment for all, Clece is an excellent example of what it means to put these principles into practice.

In 2009, a particularly difficult year for employment in Spain, Clece increased its workforce by 9.33% to 48,945 employees, as a reflection of the positive trends in its activities. As in previous years, when tackling this growth it gave precedence to those groups in greatest need of assistance in order to make access to the labour market possible: women, people with disabilities and people at risk of social exclusion.

Specifically, the number of people with disabilities who work in the organisation rose to 1,364, as against 1,142 in 2008. The increase was, then, 19.44%, a percentage which is exactly double that for the total workforce.

As regards the number of women employed by the company, this reached 40,686, representing 83% of the total workforce.

As for people at risk of social exclusion, agreements and understandings with public and private bodies throughout the country proliferated in the last year with the aim of channelling their entry to the labour market. One example is the agreement signed with the León provincial council, by means of which unemployed people who take a course as a home help assistant will be able to accompany Clece's social services personnel throughout their day and so acquire the work experience necessary in a sector with such potential for the future.

There are other particular examples of Clece's open attitude to Spain's current sociological reality. For example, there are the 93 countries – apart from Spain – from the five continents from which its workers originate. Or the fact that among those with university degrees, women make up the majority: 51% of the total. This phenomenon is even clearer if we look at diploma holders, a segment in which women hold a percentage of 69%.

Behind these figures there is a firm and wholehearted commitment which, always in harmony with the ACS Groups Corporate Responsibility policies, means a more ambitious response than that derived from mere compliance with legal obligations (Equality Act, collective agreements, etc), as it implies providing a specific solution to problems and circumstances which only real life is capable of producing. We have many practical examples of this as regards reconciliation of family and professional life. As such, the cleaning service contract for Avilés (Asturias) is worthy of mention, where Clece has included measures such as the extension of maternity and paternity leave by one week in relation to that laid down in the Collective Agreement, the provision of a crèche for children under 6 years of age and flexible working hours.

Another interesting example comes from the field of education. The Early Childhood Education Agreement does not make it mandatory for the private companies who manage these centres to finance the places occupied by their workers' children. Clece, on the other hand, has taken a lead and has already covered the cost of 9 pupils in Castile and León, 2 in La Rioja and 1 in Galicia.

A special issue is that of women who are victims of gender-based violence. Clece acts in two broad senses in this area. Firstly, it favours the hiring of women who suffer from this type of situation. One example is the various cases within the team which provides social services for San Sebastián City Council. Another is the agreement signed for the same service with the Castile and León Regional Government. Secondly, Clece offers all the personalised alternatives possible to those employees who need to distance themselves from situations of mistreatment: flexible hours, geographical mobility, etc.

Other circumstances which lead to the adaptation of working conditions for women are divorces or the need to take care of relatives due to accidents, illness or dependency.

As regards people with disabilities, Clece provides not only experience as a company which is very active in hiring for its own organisation, it also acts as a facilitator for entering the labour market in other companies. This latter task is channelled through its special employment centre, Integra, which had a workforce of 259 in 2009 after recruiting 117 new members during the year. This represented growth of 59%, a really striking number in a year in which levels of hiring for these types of workers fell by 15% in Spain, meaning that their unemployment rate is four times the average in the labour market.

With this policy of care, respect and egalitarian treatment of people who, whatever their personal circumstances, wish to develop a professional career, Clece shows that its true speciality is understanding people and managing their expectations and needs. Not by accident has one of its great transformations over recent years been its entry into the social services field, in which the ability of its professionals to relate to the people attended (old people, children or people with disabilities) is critical.

It is an effort which, in addition, has merited numerous acknowledgements from public and private bodies. One of these was its winning in June 2009 of one of the most prestigious awards in this field: the Incorpora award from the "La Caixa" Foundation, granted to Clece in the Great Company category for "its special sensitivity in the introduction to the labour market of groups of people at risk of exclusion".

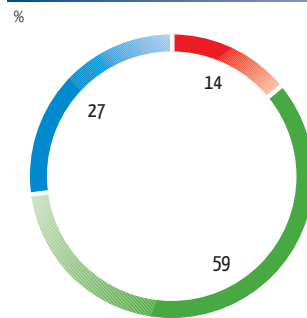


Hiring and Retaining policies

The ACS Group is made up of a total of 142,176 people, 0.8% more than last year. In 2009, the ACS Group created 1,174 net jobs.

Of the employees, 15% were contracted directly and permanently and 85% were contracted in relation to a specific project, work or temporary production joint venture.

Distribution of employees by area of activity



- Construction
- Environment
- Industrial Services and Energy

Furthermore, 32,201 people work outside of Spain. Of these, 25% work in the Construction area, 43% in Environment, 31% in Industrial Services and Energy and 1% in Concessions.

At the end of 2009, there were 54,055 women employees in the ACS Group, accounting for a total 38% of its staff. This percentage increased by 5.8% with respect to the figure for 2008. The proportion of women was two percentage points higher than in 2008.

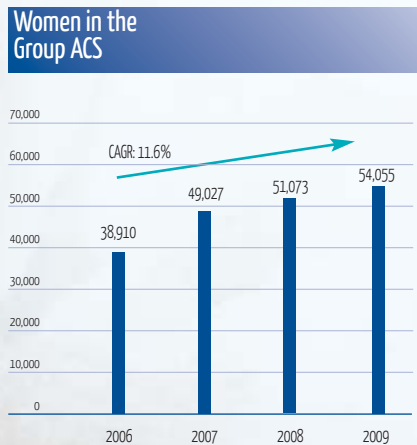
7. Commitment to the Social Environment



Women in the ACS Group

ACS' commitment to incorporating more women into the job market in the infrastructures sector manifested itself in the last year in a substantial increase in the female workforce in our Group. Specifically, there were 54,055 members of female personnel in 2009, up 5.8% with respect to 2008, women being the base of the company's growth in personnel. Hence women now account for 38% of the Group's total workforce and 29% of management and professionals with university degrees, a total of 3,652 women. Indeed, 6 out of every 10 net people joining in this category are women. Furthermore, during 2009, Mrs. Sabina Fluxá Thienemann joined the Company's Board of Directors, becoming the first woman Board Member in the Group's history.

A significant increase in female personnel has taken place over the last few years, with an annual rate of growth of over 11.6%.





In short, the ACS Group always tries to recruit and retain the best professionals in the market and so the growing recruitment of women in our company, in parallel with the incorporation of women in the job market, is a reality which fits our objective of excellence.

Equality of opportunities and non-discrimination, which are basic ACS principles written into the company's Code of Conduct, are determining factors when promoting professional and personal development for all ACS' employees and equality of opportunity is ensured through policies for action. The effectiveness of this equality policy is guaranteed as it is accompanied by objectives tending to eliminate entry barriers in sectors historically considered to be masculine and measures for reconciling professional and personal life, which have enabled the number of women with executive responsibility in the Group to increase.

Women in the ACS Group have evermore significant weight, both in terms of numbers and in the posts they occupy. Likewise, they are present, with an increasing trend, on the boards of directors of our main divisions, on the boards of directors of the companies in which ACS has a holding, in the Group's senior management and in innumerable technical, financial, human resources and legal advice offices, among others.

An illustrative example of these practices can be found in the Environment area, which has the greatest female representation in the Group at over 44,000 employees and which is one of the companies with the highest proportion of feminine employment in Spain. In carrying out daily activity, working time needs are analysed individually to be able to organise working days which enable work and personal life to be reconciled. In addition, the company offers workers who suffer mistreatment the possibility of transferring to another city where they maintain an equal or similar post to that in the original city.



7. Commitment to the Social Environment



The ACS Group follows an equal-opportunities policy that prohibits all types of discrimination against individuals in hiring or assuming positions. This policy is defined by basic principles which can be summarised under the following headings:

- A commitment to providing staff with a context and prospects in which professionals can deploy their talent and perceive their professional development as something valuable and desirable.
- A rigorous hiring process that enables the Group to rely on the best professionals in each sector.
- Promotion of gender diversity and equal opportunities.

The ACS Group's strategy involves an approach of ongoing training in the workplace, in classes or by distance learning. In terms of training in 2009, 1,317,780 hours of study were given in courses and studies relating to all its activities.

Training and career development policies

The technical excellence of the ACS Group, one of its competitive advantages, is not only based on the skills of the employees hired by the Group in view of their experience and background. Subsequent training and development are also of importance, not only in line with the Group's culture, but also the project needs that ACS' professionals confront in their professional career.

The objective is to make full use of and integrate the personal and professional diversity of its work groups in order to improve its capacity to respond to the growing needs of its clients. The Group seeks to continuously involve its entire staff in corporate objectives and philosophy, allowing employees to simultaneously develop their professional potential and skills.

Specifically, courses are given in areas related to:

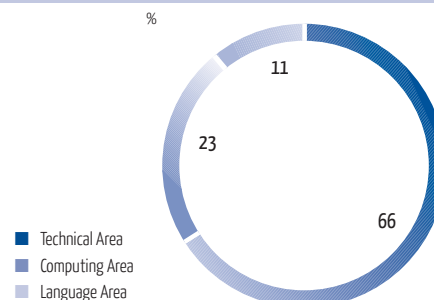
- Training of management.
- Technological specialisation in management and production systems.
- Knowledge of products and services developed.
- Policies on quality and the environment.
- Job safety.

In detail, the number of new training actions given by means of e-learning increased significantly in Dragados in 2009. The agreements reached with the School of Roadways, Canals and Ports at Santander continue to be extended for courses on Formwork and Waterproofing, the plan being to expand them to new training actions.



Distribution of hours of e-learning by areas

	Hours
Technical Area	20,980
Computing Area	7,340
Language Area	3,672
Total Hours	31,992



Telematic training projects

Technical Area	Group	Participants	Study Hours	Total
Código Técnico de la Edificación (Building Regulation)	1	54	30	1,620
Formwork	3	191	40	7,640
Nueva Ehe-08 (Regulation)	7	293	40	11,720
Total	11	538		20,980

Computing Area	Group	Participants	Study Hours	Total
Autocad 2009	1	25	10	250
Excel 2007 Basic	2	27	20	540
Excel 2007 Advanced	2	99	30	2,970
Power Point	2	49	20	980
Presto	2	56	40	2,240
Word 2007	2	18	20	360
Total	11	274		7,340

Languages Area	Group	Participants	Study Hours	Total
English	5	53	40	2,120
Spanish	3	99	80	1,552
Total	8	152		3,672



7. Commitment to the Social Environment



Furthermore, given the company's growing internationalisation, language courses have increased both for personnel in Spain and for local personnel in the reference countries (Ireland, Greece and Poland).

In the ACS Group, the prevention of workplace hazards is the most important training subject and the one in which the greatest effort and investment is made.

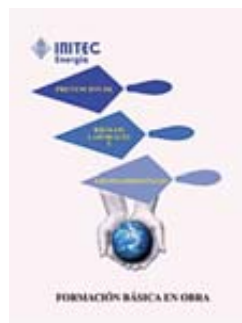
Training initiatives in 2009	Study Hours	Number of courses	Participants	Investment (million of euros)
Construction	181,072	892	11,524	1.8
Environment	765,681	3,131	32,143	4.9
Industrial Services and Energy	371,027	2,721	12,544	6.5
Total	1,317,780	6,744	56,211	13.2

Training initiatives by type of content in 2009	Production	Safety	Environment
Construction	524	288	80
Environment	772	2,280	79
Industrial Services and Energy	1,509	1,045	167
Total	2,805	3,613	326

The scope of this table is 84% of the ACS Group's workforce.

Training in safety in the ACS Group has always played an important role and numerous courses have been held over the years in order to train personnel both in general concepts and in sector-specific risks.

A total of 3,613 courses on safety and workplace hazard prevention were given in the ACS Group in 2009, 53.6% of the total courses.



7. Commitment to the Social Environment

Map of competences

In Dragados, as the lead company in the ACS Group's Construction area, a series of basic and fundamental competences which take in the company's philosophy and culture and other types of specific competences by work post, essential for effectively carrying out the work, were defined in 2009.

The advantages of aligning this business strategy with the implementation of a Map of Competences are many and varied. This practice permits the development of a group culture; facilitates the achievement of results, in the regard that the characteristics which contribute to achieving them can be identified; drives change management, as changes can be promoted and disseminated through it; facilitates the identification of professionals with potential and, finally; gives a clear, objective and complete view of the functional requirements of a work post to select the person who best fits these characteristics.

Dragados has classified all the companies work posts and divided them into three categories: Works, Machinery Fleet and Zone/Local Office. This classification is due to the particularity of each of these areas which impact directly on the performance of the work post catalogued in each of them. Each work post has an explanatory sheet containing the following data:

- Area and Address of the work post.
- Position within the functional organisation diagram.
- Objective: Description of the main mission of the work post as regards its carrying out.

- Functions: Description of each of the work post's specific activities and tasks.
- Degree of Autonomy: The main interest groups are laid down, i.e. to whom does it provide and from whom does it receive information mainly.
- Knowledge/Qualifications: Differentiates between the regulated academic knowledge demanded for the post (engineering degrees, undergraduate degrees, diplomas, etc), other sector-specific knowledge and knowledge of the company's internal programmes.
- Minimum experience required.
- Auxiliary knowledge: Other types of knowledge which facilitate, improve and assist suitability for the post.
- Salary range.
- Main risks associated with the post: Together with Prevention Management, a catalogue of specific risks for each work post has been established, where the main risks to which a worker is subject are shown depending on the tasks he or she carries out. These risks have been identified and assessed according to exposure to risk (medium, high and low). We have worked especially on this section because we understand that prevention in Dragados is not for statistics, but rather for workers, attempting to pass on the idea of the relevance and importance with which we tackle prevention in Dragados.
- Finally, and as a fundamental factor, the competence profile desirable for filling the post.

The competence profile of Dragados' employees is made up of nine basic and specific competences included in all work posts: communication, initiative, adaptability and flexibility to change, teamwork, planning and organisation, business orientation, interpersonal relationships, decision-making and discipline.

The differentiation of each work post is established by the range of levels of development and demand for each competence. Each competence has been divided in turn into 10 levels of development, which set the optimum range required for each competence for effective accomplishment in the work post.

The ideal situation is that the worker who takes up a work post is within the levels established beforehand as important to ensure appropriate skills. That is, that he or she has the required competence level to ensure good performance in the work post.



However, Dragados, with its philosophy, recognises that people are its most important “asset” and has special sensitivity for recruiting, identification of potential and professional development. Hence, all the means possible are made available to be able to rectify any deficiency as regards knowledge or personal skills through training to achieve ideal performance in the work post.

This project was internally audited in January and October of 2009 in order to check that the description of the posts fits the new economic situation and the social and professional changes and to ensure that they are up to date and effective, being understood as a dynamic project clearly evolving and adapting.

Safety and risk prevention policies

The prevention of labour risks is one of the areas of greatest importance to the ACS Group and its efforts have led to satisfactory results according to the data on accidents that occurred during the year. They represent one more step in the ongoing interest to continue being one of the companies in the sector which pays the greatest attention to safety.

The ACS Group is guided by its prevention policy, which is based on the following principles:

- *Compliance* with current legislation on labour risk prevention and other requirements voluntarily observed.
- *Integration* of labour risk prevention in all initiatives at all *hierarchical levels*, implemented through correct planning and practices.
- Adoption of any measures necessary to *ensure* the protection and well-being of staff.
- Development of human potential through appropriate *training and information* regarding labour risk prevention, fostering initiative and participation in order to achieve continuous improvement of the system.
- Ensuring the correct *control* and quality of *monitoring* of staff health.
- Qualification of staff and application of technological *innovations*.



7. Commitment to the Social Environment

As a complement to the labour risk prevention management systems in each activity area in 2009, numerous labour risk prevention campaigns were conducted, the purpose of which is to make the employees aware of these risks, reduce accidents and improve working conditions.

In 2009, heads of health and safety were added to the organisation in the different countries in which the company was set up and expanding its activity. Health and Safety Policy outside of Spain is based on the global understanding of safety adapted to the legal requirements of each country and in harmony with the respect for the differences which can become established as a function of different identities and realities.

Furthermore, this policy involves its collaborators in achieving a healthy working environment by sharing with them the values which govern the organisation. The necessary principles for collaboration and coordination are agreed with the local subcontractors, along with the health and safety standards applicable in the work centre.

The training and labour risk prevention campaign conducted by the ACS Group, as well as all the safety initiatives and protocols implemented, contributed to reducing the accidents suffered by Group employees by over 5.5% in 2009.

The ACS Group actively participates in the most important conferences, symposiums and organised events in general on labour risk prevention taking place in Spain and abroad, contributing its experience in this area.

Evolution of Prevention Rates	Frequency rate ⁽¹⁾					Severity rate ⁽²⁾					Incidence rate ⁽³⁾				
	2005	2006	2007	2008	2009	2005	2006	2007	2008	2009	2005	2006	2007	2008	2009
Construction	36	36	35	30	27	0.95	0.97	1.03	0.84	0.79	66	69	61	52	50
Environment	50	51	48	42	43	0.94	1.17	1.01	1.03	1.01	76	91	86	159	75
Industrial Services and Energy	41	26	34	32	26	1.00	0.49	0.63	0.56	0.63	74	47	61	46	47
ACS Group	45	41	39	37	36	0.96	0.94	0.85	0.78	0.87	74	73	70	71	64

The scope of this table is 82% of the ACS Groups workforce.

(1) Represents the number of accidents that occurred during the working day per million hours worked.

(2) Represents the number of working days lost due to accidents per 1,000 hours worked.

(3) Represents the number of accidents in relation to which sick leave was taken per 1,000 employees.



Initiatives for the reconciliation of family life and employment

Although contracts are awarded throughout Spain and the rest of the world, and consequently, transfers and travel of staff are inevitable, the Group makes every effort to form work teams for jobs and projects with employees that live relatively nearby, in order to avoid the displacement of families.

Among the main initiatives which have been implemented generally in numerous ACS Group companies for adaptation of working conditions in order to assist the consolidation of working and family life, the following are outstanding:

- Flexible hours. In ACS 7.9% of the workforce can take up the offer of flexible working time schemes, with a margin of one hour to change their periods for entering or leaving work.
- Reduction of the working day. There are 43,441 people in ACS who have a continuous working day or a reduced day.
- Accumulation of breast-feeding periods.
- Time off or part-time working for fathers and mothers after childbirth, which 3,096 took up in 2009.
- Change of work centre due to change of residence.
- Management of shift changes between workers in services.

One of the ACS Group's firmest commitments in the Human Resources area is to adopt effective policies for the reconciliation of family life and employment.

Trade Union representation

All employees who work in Spain, as well as expatriated Spanish ACS Group employees, are protected under collective labour agreements applicable in the sectors in which they perform their work and, in any case, by the Spanish General Workers' Statute, in addition to the labour regulations commonly applicable in all countries in which they carry out their work.

The ACS Group considers social dialogue to be very important and holds periodic meetings with the trade union representatives of each of its companies. Of ACS Group employees, 40.1% are members of or are represented by trade unions.



7. Commitment to the Social Environment



Commitment to ACS Group clients

Given the specific nature of ACS' business and the small number of clients to which it provides services, client satisfaction is measured on the basis of an organisational management model in which a very close relationship with the client prevails. Continuous contact is maintained with clients and feedback is obtained regarding their opinion of the quality of the work carried out and possible areas for improvement.

All the Group's companies and areas of activity carry out periodic client satisfaction consultations or mediations.

As a general rule, the procedures adopted by the ACS Group for the integration of client feedback are based on closeness and continual management of relations. In view of the characteristics of the clients and of the businesses in which ACS operates, technological solutions such as databases are not the best system for managing relations with clients. Finally, it is important to state that all regulations are respected to guarantee client confidentiality in all those actions where it is necessary.

A total of 2,165 satisfaction surveys were carried out in 2009, with 82.9% of replies being satisfactory or very satisfactory.

Finally, it is important to state that all regulations are respected to guarantee client confidentiality in all those actions where it is necessary..

 *Additionally, ACS Group clients can send any complaints to info@grupoacs.com*

Commitment to ACS Group suppliers and contractors

Management of Suppliers

The ACS Group relies on the systems implemented to appropriately manage its relationship with suppliers. It has centralised purchasing management systems developed for all areas, as well as various procedures which are followed by each of the Group companies and included in their quality management systems.

For example, suppliers are required to meet a series of requirements relating to health and safety. The system implemented makes it possible for the documentation sent by the supplier to be audited. With respect to contractors, compliance with requirements is audited.

Certificates and approvals are demanded and visits and audits are carried out in order to evaluate supplier quality in relation to different criteria. These criteria are established independently by each of the ACS Group's companies.

Likewise, supplier practices are monitored in accordance with the procedures implemented. In the case that non-compliance by a supplier is detected, the purchasing department is informed so that the measures deemed appropriate can be taken. If possible, it is pursued by the manager or agent him- or herself who is charged with taking the appropriate measures.

A significant number of the contracts signed by the ACS Group with suppliers have a fixed section including general specifications and a variable section detailing the requirements demanded of the suppliers. For example, in accordance with Dragados' purchasing rules, the supervisor is responsible for evaluating each contract, taking into account both environmental and prevention criteria.

The conditions stipulated for projects and agreements entered into in Spain and abroad are adapted to the laws in force in terms of collective bargaining agreements or legal regulations in relation to employees. The employment of children and the exploitation both of employees directly hired by the Group and employees of suppliers and subcontractors within the scope of the control of the work being carried out are specifically avoided. In this regard, in the event that activities outside of or contrary to law are detected, there are clauses stipulating the termination of the agreement.



7. Commitment to the Social Environment

Commitment to Society



In 2002, the ACS Group became one of the Spanish Companies adhering to the United Nations Global Compact. The Group's commitment is to include the principles of the Global Compact in its strategy and operations.

Each year the ACS Group devotes notable effort to collaboration for the development of initiatives of community interest. These are focused on undertaking measures to improve integration, cultural promotion and the generation of knowledge. The ACS Group considers that these activities serve to demonstrate the social commitment of one of the most important companies worldwide to society.

Additionally, ACS Group operations are based on the provisions contained in the OECD Guidelines for Multinational Enterprises. The ACS Group has committed to implementing measures aimed at integrating these principles of conduct into the whole of its operations.

Social Initiatives

The ACS Group and Foundation monitor the philanthropic initiatives in which the group collaborates with third parties and the impact these might have on the reputation of the ACS Group.

The ACS Group is extremely diverse and extensive and due to its very nature spontaneous philanthropic initiatives are carried out with the support of groups of people who help society in an unselfish manner, without this help necessarily being carried out as a corporate action. Philanthropic activities are carried out in ACS which, over and above corporate responsibility, represent a true commitment to individual social responsibility. Among the most significant examples in 2009 are the collaborations with NGOs such as Madre Coraje, the increase in some companies in the amounts dedicated to aid to collective agreements for workers with family members with physical or mental disabilities in their care and the collaboration with the Manuel Broseta Foundation, with the objective of promoting basic values for living together.



Philanthropy in Dragados

In Dragados we are convinced that we can enhance the competitive context and bring social and economic objectives together through philanthropy. We believe that in this way it is also possible to improve the long-term prospects for the business.

Concerning ourselves about society requires not simply the donation of money, but rather leveraging Dragados' capabilities and relationships in support of beneficial causes.

We believe that this produces social benefits. We consider that philanthropic investments can improve education and quality of life in the society.

2009 Initiatives:

1) Dragados carried out two works in the La Mina area of Sant Adrià del Besós in Barcelona, specifically the construction of 61 housing units and a car park. La Mina is one of Barcelona's most run-down and troubled areas. In carrying out this work, 5 people at risk of social exclusion were hired, either directly or via subcontractors, as social and occupational integration. The project was coordinated and supervised by an assistant from the La Mina area Consortium who carried out the follow ups and met with our Head of Works to comment on these workers' progress.

2) The ACS Group, through Dragados, Clece and other large companies, participates in the Integra Foundation. This is a non-profit organisation which works for the reintroduction to work of socially excluded groups, acting as an intermediary between NGOs and companies.

Victims of mistreatment, the homeless, immigrants, people recently released from jail, victims of drugs and prostitution, people with family difficulties, the long-term unemployed, etc are the socially excluded groups with which the Foundation works, people with family and personal difficulties from which they can begin to recover thanks to this organisation bridging the gap between NGOs and companies.

The Foundation deals on the one hand with obtaining the collaboration of companies ready to provide a second chance to people with difficult pasts and, on the other hand, with contacting collaborating NGOs for the latter to send candidates selected not only based on their technical profile, but also on their psychological and motivational profile.

Once in the company, confidentiality is ensured in the selection process which takes place like in any other hiring. Only the person responsible for selection is aware of their link to the Foundation, enabling the selected candidate to start from zero and recover their dignity.

Dragados interviewed 12 people from this Foundation in 2009 and at 31 December 2009, 6 people selected through Integra were still with the company. A follow-up is carried out with the people hired, basically during the 6 to 12 months after hiring, to monitor their process of adaptation and either correct attitudes causing negative assessment of their work or congratulate them if everything is going well to encourage their efforts.

The year 2009 was very important for us as the Integra Foundation awarded ACS a special mention for having exceeded 150 recruitments. Clecés Human Resources Director, Purificación González, received the prize.

3) Collaboration with the School of Roadways, Canals and Ports at Santander

As in previous years, Dragados collaborated in the organisation of the trip for final year students of the University of Santander's School of Roadways, Canals and Ports.

This year the trip was to a hydraulic works site the company is carrying out in Navarre, the heightening of the Yesa dam. The trip took place in April 2009 and 21 students from the ICyP and 17 from the School of Civil Works Technical Engineers took part.

In the words of the students themselves:

Several weeks after the visit we still remember it with special fondness: the type of work is without a doubt very attractive and the project for heightening the dam is undoubtedly interesting, without ignoring the controversy and great disputes. But there is something else; the enormous interest shown by all the people who received us during the visit, who responded attentively to all the inquiries posed by the students and who explained the work from the in-depth knowledge they have of it. For all these reasons, we wish to offer our most sincere thanks to everyone.



7. Commitment to the Social Environment

To maximise the effectiveness of its philanthropic and corporate citizenship initiatives, the ACS Group attempts to transfer its technical knowledge to the area of philanthropic actions. So the Board of the ACS Foundation replicates the ACS Group Board of Directors. For example, the General Secretary and Board Member of the ACS Group is also the Secretary of the ACS Foundation.

The Foundation's aims include, inter alia, transferring the ACS Group's technical knowledge in areas such as the following to maximise the impact of the resources allocated:

- I. Accessibility.
- II. Environment .
- III. Cultural and educational promotion.
- IV. The spreading and renovating of Spain's historical heritage.
- V. Sponsorship of foundations and institutions.

In 2009 the Foundation diversified its activities relating to basic support programmes and expanded its relations with public and private institutions relating to these.

In this regard, the public-private strategic alliance entered into by the ACS Foundation and the Secretary of State for International Cooperation is noteworthy, as under this the ACS Foundation, backed by the Founder, will carry out activities for technical assistance and training relating to safety, occupational health and the environment. In this same framework, the first prize for Architectural and Urban Accessibility was put into effect for Latin American Local Councils, which went to two town councils in Ecuador and Colombia.

The programmes directly executed by the ACS Foundation were consolidated: elimination of physical and architectural barriers to physically handicapped

The objective of the ACS Foundation is to integrate, coordinate and manage all the ACS Group's efforts relating to patronage of the arts and cultural, institutional, sporting or environmental sponsorship as well as the granting of awards and scholarships, promotion of training and research, charity and all similar activities at a domestic and international level.



people; promotion, upkeep and spreading of Spain's historical heritage assets; environmental defence; cooperation for development; sponsorship of research activities and sponsorship of artistic and cultural activities. Additionally, the Foundation has continued its policy of backing universities and other foundations and institutions so they are able to fulfil their own aims on the basis of their relationship with the aims of the ACS Foundation.

	Number of projects	Number of beneficiaries/participants	Investment (thousand of euros)
Accessability	35	> 1,000,000 (*)	780
Environment	9	> 40,000	210
Cultural and Educational Promotion	40	> 850,000	800
Spreading and Renovating of Spain's Historical Heritage	5	> 175,000	200
Scientific and Technical Investigation	9	n.a.	400
Sponsorship of Foundations and Institutions	n.a.	75 institutions and/or foundations	1,355
Total	98	> 2,000,000	3,745

(*) The number of impacts cannot be quantified, but during the whole of 2009 (and up to 2012) ACS sponsored the Paralympic Sport Support plan for the Vancouver and London games (Spanish Paralympic Committee) which has been continually covered on the television, in the significant press (Marca, As, La Vanguardia, El País, La Razón. etc), digital newspapers, specialised magazines, etc.

Noteworthy in 2009 were activities which took place related to cooperation for carrying out and sponsoring research. The main activities in cooperation were the sponsorship of the Seminar on Health and Safety Conditions in Building Works, held in Montevideo (Uruguay) from 24 to 28 August 2009, in cooperation with the Spanish Agency for International Cooperation for Development (AECID). The seminar was mainly given by experts in Labour Risk Prevention belonging to Dragados, the ACS Group's main construction company. Students from the Mercosur countries attended. The Spanish Agency for International Cooperation for Development congratulated the ACS Foundation for the quality of the technical support provided by Dragados and the extremely high assessment level received by the company's instructors from the students.

Likewise, an assessment was made of the accessibility of the project carried out by the Spanish Agency for International Cooperation (AECI) for the new Spanish cultural centre to be built in Bogotá. The ACS Foundation made an assessment in this regard and reformulated the original project to make the Cultural Centre fully accessible, also taking into account that this project from Spain in Colombia needs to be exemplary as regards accessibility.

Finally, the sponsorship of the Carolina Foundation Scholarship Programme for the 2009/10 course, for high level studies in Spain for people from Latin America, was boosted. The ACS Foundation's contribution was applied by the Carolina Foundation to scholarships for master's programmes at important Spanish universities.

Noteworthy as regards the sponsorship of research are the activities of the Pasqual Maragall Private Foundation for research into Alzheimer's and related Neurodegenerative Diseases, sponsorship of the African Medical and Research Foundation (AMREF) Flying Doctors, for the carrying out of activities and projects aimed at cooperation in development on the African continent, particularly the promotion of sustainability by means of the creation of infrastructures for drinking water supply and drainage respectful of the environment and promotion of health through education on the subject at various schools in Uganda.

Furthermore, a collaboration agreement was fostered between Briviesca Town Council, the Aspanias Foundation and the ACS Foundation to carry out a research project to identify inhabitants with disabilities in the La Bureba administrative division and to analyse their situation and needs. Among the objectives of the project are the carrying out of a quantitative and qualitative analysis of the population with disabilities who live in or come from the La Bureba administrative area, to identify and analyse the needs of the population and their coverage by the services set up in the area and progress, as conclusions, to a proposal for future lines of intervention which will need to be taken on to cover the population's as yet unfulfilled needs.

Finally the collaboration with the Spanish Amyotrophic Lateral Sclerosis Association (ADELA) is worthy of note. The objective of this association is to fight in all its aspects against amyotrophic lateral sclerosis and other motor neurone diseases by carrying out research and providing support for all the problems derived from this disease and its consequences.

Furthermore, sponsorship agreements have been entered into for the fulfilment of the foundation's own purposes with the following Foundations and Institutions:

Spanish Association of Foundations
Museo Nacional Centro de Arte Reina Sofía
Amigos del Museo del Prado Foundation
Casa Asia
COTEC Foundation
Príncipe de Asturias Foundation
Príncipe de Girona Foundation
Victims of Terrorism Foundation
Hispania Nostra
Foundation for Analysis and Social Studies
Ideas for Progress Foundation
Spanish Anti-Cancer Association
Amigos en Marcha Foundation
Association of Neurofibromatosis Sufferers
Adapta2 Foundation
Afim Foundation
Betesda Foundation
Charitable Construction Foundation
Dales la Palabra Foundation
Emalaikat Foundation
Hospitalitat Mare de Deu de Lourdes Foundation
G3 Private Foundation
Spanish Red Cross


7. Commitment to the Social Environment

Principles governing this report

For the ACS Group, the preparation of this Corporate Responsibility Report implies the formalisation of a policy focused on understanding the main dilemmas and challenges faced by the infrastructure development and energy sector and society as a whole.

This report was prepared following the G3 guidelines from the Global Reporting Initiative (GRI). In this manner, all issues of relevance to the Company's stakeholders were taken into account. The data and headings explained in this report apply to the Group's companies in accordance with that reported in terms of percentage of total sales. In those cases where the scope is other than 100%, this is clearly specified in the text and tables.

With respect to the levels of application defined by the GRI, the ACS Group has given this report an A+ rating. Accordingly, the principles and guidelines of the G3 Guide were applied and each chapter details both the organisation's profile and its management approach. Additionally, all performance indicators considered to be of principal importance are contained in this report.

		2002 In Accordance	C	C+	B	B+	A	A+
Mandatory	Selfdeclared							✓
Optional	Checked by third party							✓
Optional	Checked by GRI							

The ACS Group has applied the following GRI G3 principles for defining the contents and guaranteeing the quality of the information included in this report:



Principle of materiality

The ACS Group carried out a materiality study based on the AA1000 Standard of Accountability, the purpose of which was to identify the items of most relevance to the stakeholders and the company itself. The following aspects were studied:

The maturity of issues, determined by the attention paid to them by the companies in the industry in which ACS operates.

The attention paid to the different aspects of corporate responsibility by industry associations considered to be of significance.

The relevance of corporate responsibility issues based on the attention paid to them by the media and social organisations.

Context of sustainability

The objective of this report is to express the performance of the ACS Group in each of the three sustainability areas: economic, social and environmental. Throughout this report, information is supplied in relation to the context of each of these.

Exhaustiveness

In the preparation process, the coverage and scope of this report was clearly defined, giving priority to information considered to be material and including all significant events that took place in 2009, without omitting information of relevance to the Group's stakeholders.

The coverage of the report was determined in parallel with its content. In the case that there were no changes in the chapters with respect to coverage, these have been indicated.

Additionally, the relevant issues, the indicators included herein and the matters covered by the 2009 Corporate Responsibility Report offer an overview of the significant impacts in the economic, social and environmental fields.

Comparability

As far as possible, the information included in this report was organised in such a manner that the stakeholder may interpret the changes undergone by the ACS Group with respect to previous years.

Balance

This report includes both positive and negative aspects, in order to present an unbiased image and to enable stakeholders to reasonably assess the Company's performance.

Accuracy and clarity

This report contains numerous tables, graphs and diagrams, the purpose of which is to make the report easier to understand. The information included in the report is meant to be clear and accurate in order to be able to assess the performance of the ACS Group. Additionally, as far as possible, the use of technical terms whose meaning may be unknown to stakeholders has been avoided.

Reporting frequency

The ACS Group has the commitment to report its corporate responsibility actions annually. This report relates to the Group's performance in 2009 in the economic, social and environmental fields.

Reliability

The reliability of the information included in this 2009 Corporate Responsibility report was checked by KPMG, the firm responsible for its verification.

 *Further information on Accountability at*
<http://www.accountability21.net/>

7. Commitment to the Social Environment

Associations to which the ACS Group belongs

The ACS Group, through the employers' organizations to which it belongs, participates, supports and collaborates with the competent regulatory bodies in the definition and implementation of the most appropriate public policies related to infrastructure development and energy in the markets in which it operates.

ACS Group

CEOE-CEIM

Circle of Entrepreneurs

Internal Auditors' Institute

COTEC Foundation for Technological Innovation

Association for the Progress of Management

Construction

SEOPAN

National Construction Federation (CNC)

Association of Spanish Road, Tunnel, Bridge and Toll Road Concession Companies (ASETA)

Association of Infrastructure Maintenance and Operation Companies (ACEX)

Technical Association of Ports and Coasts (ATPYC)

Spanish Association of Workplace Prevention Services (AESPLA)

Madrid Foundation of Excellence

Spanish Standardisation and Certification Association (AENOR)

Spanish Tunnel and Underground Work Association (AETOS)

Environment

Association of Public Cleaning Companies (ASELIP)

Association of Landscape and Environment Restorers (ASERPUMA)

Spanish Association of Gardening Companies (ASEJA)

Madrid Logistics Platform

USW Energy Recovery Business Association (AEVERSU)

Spanish Facility Management Association (SEFM)

Industrial Services and Energy

Confemetal

Conseil International des Grands Réseaux Électriques (CIGRE)

Spanish Association of Assembly and Industrial Maintenance Companies (ADEMI)

Spanish Association for the Promotion of the Thermal Solar Energy Industry (PROTERMOSOLAR)

Solar Thermal Electricity Association (ESTELA)

Spanish Energy Club

Association of Metal Companies of Madrid (AECIM)

Association of Renewable Energy Promoters (APA)

Association of Wind Farm Developers and Producers (APREAM)

Spanish Association of Desalination and Reuse (AEDYR)

A tall, modern building with a glass facade and a stone-clad section. The ACS logo is visible at the top. The building is partially obscured by a large, curved, light blue graphic element on the left side of the page.

ACS
GRUPO ACS

We would like to know your opinion

As you have been able to read from the previous pages of this report, at the ACS Group we understand corporate responsibility as a commitment which determines the Company's relationship with the environment and with each of its stakeholders. This Corporate Responsibility Report aims to include the main milestones and programmes carried out by the ACS Group aimed at improving relationships with its different stakeholders.

The ACS Group considers the assumption of corporate responsibility principles to be a continual improvement process, in which it is crucial to rely on the opinion of the different stakeholders. Hence, we would be grateful to receive any opinion you may have on this report at:

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E-mail: rsc@grupoacs.com

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www.grupoacs.com



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28046 Madrid

Independent Assurance Report to the Management of Actividades de Construcción y Servicios, S.A.

(Free translation from the original in Spanish.
In case of discrepancy, the Spanish language version prevails.)

We performed a limited assurance review on the non-financial information contained in Actividades de Construcción y Servicios, S.A., (hereinafter ACS) Corporate Responsibility Report for the year ended 31 December 2009 (hereinafter “the Report”). The information reviewed corresponds to the economic, environmental and social indicators referred to in the chapter entitled “Main performance indicators”.

ACS management is responsible for the preparation and presentation of the Report in accordance with the Sustainability Reporting Guidelines version 3.0 (G3) of the Global Reporting Initiative as described in the section entitled “Principles governing this report”. The self-declared application level, which has been confirmed by Global Reporting Initiative, is detailed in the above-mentioned section. ACS management is also responsible for determining its objectives in respect of the selection and presentation of sustainable development performance; and for establishing and maintaining appropriate performance management and internal control systems from which the reported performance information is derived.

Our responsibility is to carry out a limited assurance engagement and to issue an independent report based on the work performed, which refers exclusively to the information corresponding to the year 2009. Data corresponding to previous years have not been the object of review. We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000, “Assurance Engagements other than Audits or Reviews of Historical Financial Information”, issued by the International Auditing and Assurance Standards Board. This standard requires that we plan and perform the engagement to obtain limited assurance about whether the Report is free from material misstatement and that we comply with the independence requirements included in the International Federation of Accountants Code of Ethics which outlines detailed requirements regarding integrity, objectivity, confidentiality and professional qualifications and conduct.

A limited assurance engagement on a sustainability report consists of making inquiries to Management, primarily to the persons responsible for the preparation of information presented in the Report, and applying analytical and other evidence gathering procedures, as appropriate through the following procedures:

- Interviews with relevant ACS staff concerning the application of sustainability strategy and policies.
- Interviews with relevant ACS staff responsible for providing the information contained in the Report.
- Analysing the processes of compiling and internal control over quantitative data reflected in the Report, regarding the reliability of the information, by using analytical procedures and review testing based on sampling.
- Reading the information presented in the Report to determine whether it is in line with our overall knowledge of, and experience with, the sustainability performance of ACS.
- Verifying that the financial information reflected in the Report was taken from the annual accounts of ACS, which were audited by independent third parties.

KPMG Asesores, S.L., a limited liability Spanish company, is a subsidiary of KPMG Europe LLP and a member firm of the KPMG network of independent member firms affiliated with KPMG International, a Swiss cooperative.

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The extent of evidence gathering procedures performed in a limited assurance engagement is less than that for a reasonable assurance engagement, and therefore a lower level of assurance is provided. Also, this report should not be considered an audit report.

Our multidisciplinary team included specialists in social, environmental and economic business performance.

Based on the procedures performed, as described above, nothing has come to our attention that causes us to believe that the data included in the Corporate Responsibility Report of Actividades de Construcción y Servicios, S.A. for the year ended 31 December 2009 have not been reliably obtained, that the information has not been fairly presented, or that significant discrepancies or omissions exist, nor that the Report is not prepared, in all material respects, in accordance with the Sustainability Reporting Guidelines (G3) of the Global Reporting Initiative as described in the "Principles governing this report" section of the Report.

Under separate cover, we will provide ACS management with an internal report outlining our complete findings and areas for improvement.

KPMG Asesores, S.L.

(Signed)

José Luis Blasco Vázquez
Partner

26 March 2010

Main Performance Indicators

Profile Disclosure

Strategy and Analysis

	Cross-Reference
1.1 Statement from the most senior decision-maker of the organization.	AR. 4,5
1.2 Description of key impacts, risks, and opportunities.	CSRR. 6,7, 11

Organizational Profile

	Cross-Reference
2.1 Name of the organization.	CSRR. Cover
2.2 Primary brands, products, and/or services.	AR. 33, 61 y 87
2.3 Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	AR. 33, 61 y 87
2.4 Location of organization's headquarters.	CSRR. 85
2.5 Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	AR. Jacket, 29, 59, 83
2.6 Nature of ownership and legal form.	IGC. Cover
2.7 Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	AR. Jacket, 29, 59, 83
2.8 Scale of the reporting organization.	CSRR. 17
2.9 Significant changes during the reporting period regarding size, structure, or ownership.	FER. 5
2.10 Awards received in the reporting period.	CSRR. 49

Report Parameters

	Cross-Reference
3.1 Reporting period (e.g., fiscal/calendar year) for information provided.	CSRR. Cover, 83
3.2 Date of most recent previous report (if any).	2008
3.3 Reporting cycle (annual, biennial, etc.)	CSRR. 83
3.4 Contact point for questions regarding the report or its contents.	CSRR. 85
3.5 Process for defining report content.	CSRR. 83
3.6 Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	CSRR. 83
3.7 State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	CSRR. 83

AR: Activity Report of ACS Group 2009.
 FER: Financial and Economical Report of ACS Group 2009.
 CSRR: Corporate Social Responsibility Report of ACS Group 2009.
 CGR: Corporate Governance Report of ACS Group 2009.

Cross-Reference

3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	For the data collection, the company has followed a financial control criteria, informing on the data relative to those companies financially controlled, accounting data by 100%.
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	CSRR. 83
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	CSRR. 49, 57. Improvements in the accounting systems have been adopted, regarding the range of the data in the report. The company has used this new calculation base to express 2008 data. The changes adopted are included in the appropriate pages of the report.
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	CSRR. 49, 57. Improvements in the accounting systems have been adopted, regarding the range of the data in the report. The company has used this new calculation base to express 2008 data. The changes adopted are included in the appropriate pages of the report.
3.12	Table identifying the location of the Standard Disclosures in the report.	CSRR. 88
3.13	Policy and current practice with regard to seeking external assurance for the report.	CSRR. 83, 86

Governance, Commitments, and Engagement

Cross-Reference

4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	CGR. 10, 31
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	CGR. 10, 13, 22
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	IGC. 11, 12
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	IGC. 47
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	IGC. 17
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	IGC. 29
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	IGC. 31
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	CSRR. 4-8
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	CGR. 38-40, 43, 60

AR: Activity Report of ACS Group 2009.

FER: Financial and Economical Report of ACS Group 2009.

CSRR: Corporate Social Responsibility Report of ACS Group 2009.

CGR: Corporate Governance Report of ACS Group 2009.

Main Performance Indicators

		Cross-Reference
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	CGR. 64
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	CGR. 42, 43
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	CSRR. 78
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	CSRR. 84
4.14	List of stakeholder groups engaged by the organization.	CSRR. 9
4.15	Basis for identification and selection of stakeholders with whom to engage.	CSRR. 9, 83
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	CSRR. 9
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	CSRR. 83, 8, 9

Economic

		Cross-Reference
	Disclosure on Management Approach EC.	CSRR. 13, 25
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	FER. 6
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	CSRR. 7
EC3	Coverage of the organization's defined benefit plan obligations.	CSRR. 75
EC4	Significant financial assistance received from government.	FER. 10
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	The company has not developed specific tools to promote engagement with local providers. The company's approach to this policies will be defined in the long term.
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	The company has not developed specific tools to promote local management hiring. The company's approach to this policies will be defined in the long term.
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	CSRR. 80

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 FER: Financial and Economical Report of ACS Group 2009.
 CSRR: Corporate Social Responsibility Report of ACS Group 2009.
 CGR: Corporate Governance Report of ACS Group 2009.

Environmental

	Cross-Reference
Disclosure on Management Approach EN.	CSRR. 42, 44, 56, 58
EN1 Materials used by weight or volume.	CSRR. 43
EN2 Percentage of materials used that are recycled input materials.	CSRR. 47. Partial data is provided for Construction area. The decentralization of the activities and IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.
EN3 Direct energy consumption by primary energy source.	CSRR. 43, 46
EN4 Indirect energy consumption by primary source.	CSRR. 43
EN8 Total water withdrawal by source.	CSRR. 43
EN11 Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Current IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.
EN12 Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	CSRR. 50
EN16 Total direct and indirect greenhouse gas emissions by weight.	CSRR. 43, 48, 56
EN17 Other relevant indirect greenhouse gas emissions by weight.	Current IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.
EN19 Emissions of ozone-depleting substances by weight.	Current IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.
EN20 NOx, SOx, and other significant air emissions by type and weight.	CSRR. 43
EN21 Total water discharge by quality and destination.	CSRR. 43
EN22 Total weight of waste by type and disposal method.	CSRR. 43, 58
EN23 Total number and volume of significant spills.	Data available for Construction and Environmental Services Activities. The data collecting systems have registered 1,398 non significant incidents and non conformities.
EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	CSRR. 49, 57, 61. Example in CSRR. 50
EN27 Percentage of products sold and their packaging materials that are reclaimed by category.	No activity of the company markets any product nor packaging capable of being reclaimed.
EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	28 sanctions totalling fines for 106,931 euros.

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Main Performance Indicators

Social

Labor Practices and Decent Work		Cross-Reference
	Disclosure on Management Approach LA.	CSRR. 63, 64, 68, 73
LA1	Total workforce by employment type, employment contract, and region.	CSRR. 65
LA2	Total number and rate of employee turnover by age group, gender, and region.	Current IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	CSRR. 75
LA4	Percentage of employees covered by collective bargaining agreements.	CSRR. 75
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	CSRR. 57
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	CSRR. 74
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	CSRR. 68
LA10	Average hours of training per year per employee by employee category.	CSRR. 68
LA12	Percentage of employees receiving regular performance and career development reviews.	CSRR. 71
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	CSRR. 65, 66
LA14	Ratio of basic salary of men to women by employee category.	Current IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.

Human Rights		Cross-Reference
	Disclosure on Management Approach HR.	CSRR. 4-6, 77, 78
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	CSRR. 78
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	CSRR. 78
HR4	Total number of incidents of discrimination and actions taken.	CSRR. 6
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	CSRR. 75
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	CSRR. 6
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor.	CSRR. 6

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Society		Cross-Reference
	Disclosure on Management Approach SO.	CSRR. 4-6, 61, 78, 80
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	CSRR. 78, 80
SO2	Percentage and total number of business units analyzed for risks related to corruption.	No activity-specific analysis on corruption has been performed by the company. This analysis is scheduled to be performed in the long term.
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Current IT systems make difficult the data gathering relative to all the company. The company will develop, in the long term, IT systems prepared to obtain this information.
SO4	Actions taken in response to incidents of corruption.	CSRR. 6
SO5	Public policy positions and participation in public policy development and lobbying.	CSRR. 6
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Legal departments in the company have not registered any significative sanction derived from any law default, apart from those expressed in indicators PR) and EN28.

Product Responsibility		Cross-Reference
	Disclosure on Management Approach PR.	CSRR. 13, 14
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	CSRR. 31
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	CSRR. 14, 15
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	This indicator is not applicable to the company as ACS does not perform any marketing, promotion or sponsorship communication.
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	The legal departments of the company have not registered any significative sanction related to the provision or usage of their products and services.

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