

CORPORATE RESPONSIBILITY REPORT
OF THE ACS GROUP
2012





An aerial photograph showing a multi-lane highway bridge with concrete pillars, crossing a deep valley filled with dense green forest. The bridge curves to the right, and the surrounding landscape is a mix of natural greenery and some cleared areas near the road.

CORPORATE RESPONSIBILITY REPORT OF THE ACS GROUP

“This leadership is present in our Corporate Responsibility strategy, which is shaped around our commitments to creating value, integrity, technological development and the natural and social environment”

Florentino Pérez, Chairman of the ACS Group

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1. LETTER FROM THE CHAIRMAN

Dear Shareholder



We present you with the ACS Group's Corporate Responsibility Report for another year. This document summarises the policies and actions for 2012 in the ethical, social and environmental fields for the various companies that make up the Group around the world.

The ACS Group is a world leader in infrastructure development and is involved in the majority of developed markets through companies with high operational, technical and organisational sophistication. With turnover in 2012 of €38,396 million and 162,471 employees in over 60 countries, ACS is a reference company in the infrastructure sector, a key industry for social and economic development of the world economy. This leadership is present in our Corporate Responsibility strategy, which is shaped around our commitments to creating value, integrity, technological development and the natural and social environment.

By virtue of these commitments, the various ACS companies autonomously develop economic, social and environmental initiatives which are aligned with a single strategy guided and coordinated by the Group, but which are at the same time specific to the markets, areas of activity and stakeholders to which they are aimed. We present this common strategic line in this document, based on the Group's corporate values, i.e. the decentralisation, client service, results orientation and strict risk control, which make up our corporate culture.

The ACS Group's main achievements in 2012 related to Sustainability focus on the operation of the Ethical Channel, improvements in environmental efficiency and continuing efforts to reinforce health and safety in the workplace.



Related to our commitment to ethics and integrity, in 2012, the first full year of operation of our Ethical Channel, 11 communications were reported through the means made available for the purpose. All the proceedings opened as a result of these communications were analysed and resolved satisfactorily.

In terms of our commitment to environmental efficiency, we reinforced our greenhouse gas emission saving and control policy, enabling us to improve our carbon intensity ratio to 41 tonnes CO₂ per million euros of turnover, 33.0% less than in 2011.

Finally, I want to highlight again our firm commitment to health and safety at work, where we have dedicated funds totalling €39 million in all our business areas – 2.5% of Net Operating Profit – aimed at safety-related functions and the promotion of an effective risk prevention culture.

We also developed active policies to expand OSHAS 18001 certification coverage to reach 88.9% of our employees, meaning more effective risk control.

We will continue with the strategy of global leadership over the coming year, without forgetting the Sustainability facet, which results in greater value creation for our shareholders, employees and clients and for all the Stakeholders with whom we relate.

Florentino Pérez
Chairman of the ACS Group

2. THE ACS GROUP

2.1. Company Profile

2.1.1. Corporate Strategy

The ACS Group¹ is a worldwide reference in the infrastructure development industry, participating in sectors which are fundamental to the economy. It defines itself as a company committed to economic and social progress in the countries where it is present.

ACS is positioned as a world leader in the infrastructure development industry, with a clear and defined mission:

**TO PURSUE GLOBAL LEADERSHIP,
OPTIMISING THE PROFITABILITY OF THE
RESOURCES EMPLOYED AND PROMOTING
SUSTAINABLE DEVELOPMENT**

¹ The parent company of which is ACS, Actividades de Construcción y Servicios S.A., with registered offices in Madrid, Spain.



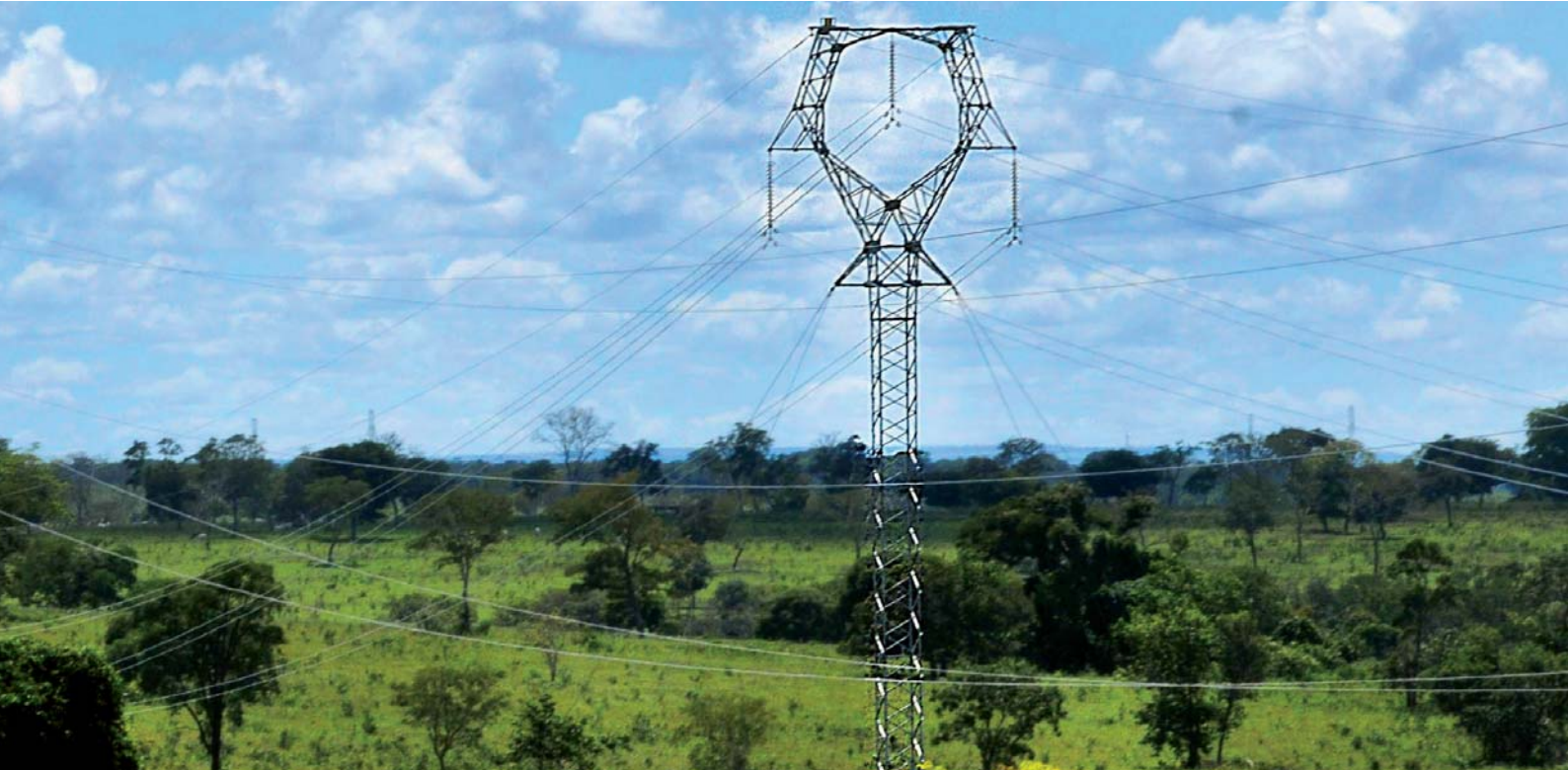
PROFITABILITY AND INTEGRITY, TOGETHER WITH COMMITMENT TO STAKEHOLDERS, ESPECIALLY COMMITMENT TO CLIENTS, AND OPERATIONAL EXCELLENCE, ARE THE ACS GROUP'S IDENTIFYING FEATURES

Improving society, generating wealth to guarantee the well-being of the citizens it serves, in the final analysis, is a primordial part of the ACS Group's mission.

The ACS Group's commitment to society is summarised in three fields of action:

- 1. RESPECT FOR THE SOCIAL, ECONOMIC AND ENVIRONMENTAL SETTING**
- 2. PROMOTION OF INNOVATION AND RESEARCH IN ITS APPLICATION TO INFRASTRUCTURE DEVELOPMENT**
- 3. CREATION OF EMPLOYMENT AND WELL-BEING, AS AN ECONOMIC MOTOR FOR ITS STAKEHOLDERS**

This performance and all the Group's activities are impregnated with the corporate values ACS has developed over its nearly 30 years of history and form the basis of the actions of all the Group's employees:



2. THE ACS GROUP

2.1.2. Description of the ACS Group's Activities

The ACS Group is a worldwide leader in the infrastructure development industry. The company operates in over 60 countries and employs a total of 162,471 employees. Of these, 49,967 work in Spain and the other 112,504 abroad. The five countries with the highest levels of activity are Spain, Australia, the United States, Germany and Mexico.

In 2012, the year to which this report refers, ACS had turnover of €38,396 million, a sales figure which makes the company one of the largest listed companies in the world² by revenue in the construction and infrastructure sector. It recorded a recurring net profit of €705 million and ended the year with an order book of €65,626 million, equivalent to 21 months' activity. At 31 December 2012, the ACS Group recognised equity of €5,712 million and net balance sheet debt of €4,952 million, 46.9% lower than recorded in 2011.

In the construction area, ACS mainly carries out projects in the fields of civil works, residential and non-residential building, development and management of infrastructure concessions and mining operations. The ACS Group's construction

activity is based on the provision of services to third parties, both private and public clients, in countries where ACS has a consolidated local presence or where it carries out infrastructure concession projects. The Construction area had turnover of €29,683 million in 2012 and employed 94,392 people, 58.1% of the total workforce.

In turn, the Industrial Services area provides maintenance and support services to industrial clients, electricity, oil, gas and telecommunications companies. In addition, it carries out turnkey energy and industrial projects for its clients worldwide. This area had turnover of €7,050 million in 2012 and employed 39,140 people, 24.1% of the total employees.

The Environment area focuses its activity on the carrying out of municipal solid waste collection, cleaning and gardening services, as well as the management of large infrastructures for waste treatment and recycling, incinerating and biomethanisation plants and also dumps. Additionally, it offers facility management services for buildings and infrastructures. Net sales totalled €1,691 million in 2012. A total of 28,886 employees participated in its activities, 17.8% of the Group total.

² According to ENR in its August publication Top Global Contractors 2012.



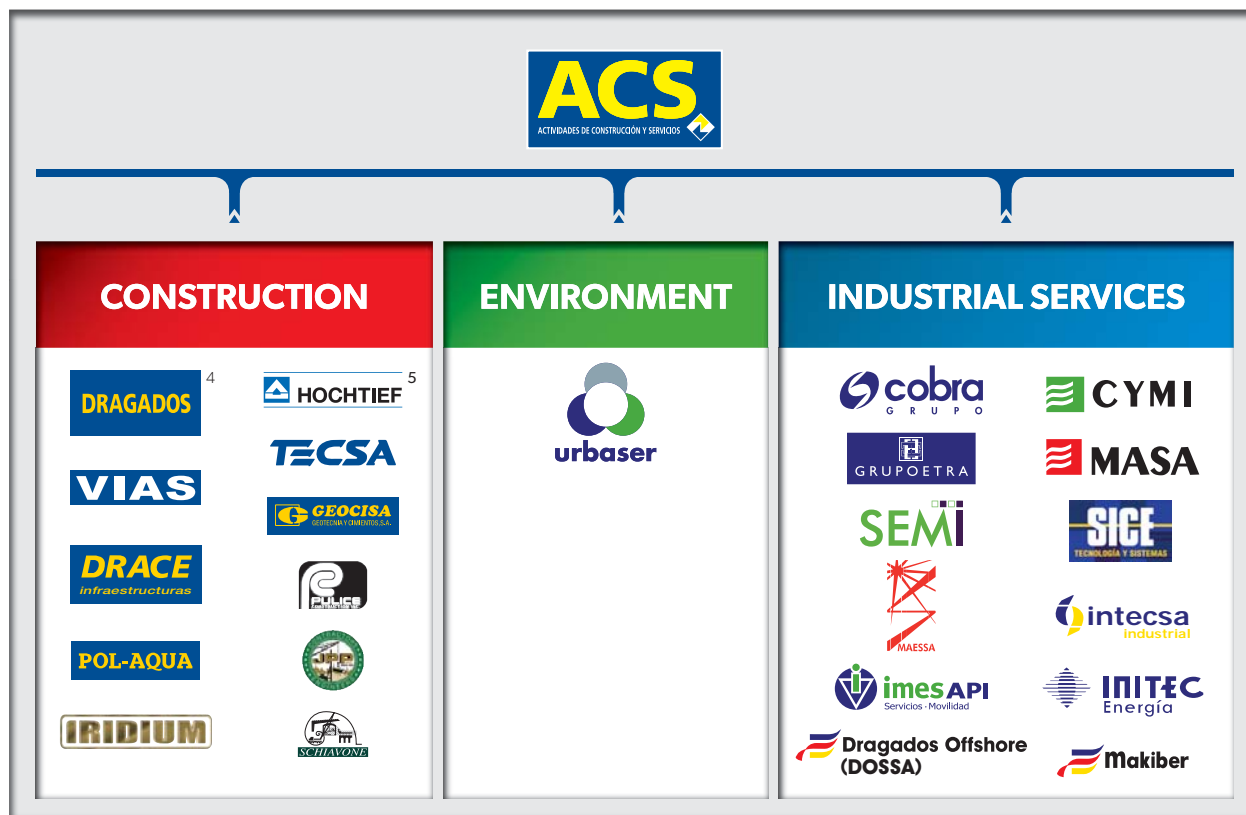
2.2. The ACS Group and Corporate Responsibility

The ACS Group has a decentralised structure³ based around its three areas:

Construction,
Environment and
Industrial Services,

and it carries out its activities through dozens of different companies. This complex but highly efficient organisation encourages the Group's companies to compete and carry out their work independently, at the same time sharing common guidelines which add value for their clients. Included in this report are the data for the following companies:

**THE ACS GROUP IS
ONE OF THE LARGEST
COMPANIES ON ITS
INDUSTRY**



³ It is important to emphasise that:

- Clece, ACS's Integral Maintenance Company, which had turnover of €1,175 million in 2010, with 49,503 employees, was deconsolidated in 2011. Information for it is not included in 2012.
- HOCHTIEF, the German construction company acquired by ACS in 2011, has fully consolidated its accounts in ACS since June 2011.

The effect of this change makes comparison between the years 2009-2010, 2011 and 2012 difficult due to HOCHTIEF's weight in terms of sales, which were much higher than those of Clece, and the change in the number of employees. Furthermore, Clece was included in the Environment section and Hochtief is now a company in the Construction area.

⁴ Dragados, Dragados USA & Canada & Dragados Poland.

⁵ HOCHTIEF Americas, HOCHTIEF Europe & Leighton.

2. THE ACS GROUP

Each of the ACS Group's companies is managed autonomously, with independent functional managements and flexible and sovereign executive bodies. The aim of this type of organisation is to promote:

- **Profitability.**
- **Decentralisation.**
- **Reduced bureaucracy.**
- **Entrepreneurship.**
- **Competitiveness.**
- **Flexibility and ability to adapt.**
- **Diversity.**
- **Subcontracting of activities.**

The objective is for all the ACS Group's companies to share the Group's values and culture, at the same time as each operates in a standalone manner, individually contributing numerous valid and profitable management formulas, thanks to the multiple factors involved in their decision making and generating know-how and good practices which are also independent.

Therefore, contributions from a multitude of companies come together in the ACS Group's Sustainability effort, defining its policies for action

autonomously and managing their resources in the most efficient manner possible, always covered by a common objective.

To tackle the immense challenge presented by the coordination of the ACS Group's sustainability, the company's Corporate Responsibility area carries out thorough data collection, with contributions from over one hundred functional directors from key areas for sustainability: Environment, Human Resources, Quality, R&D+i, Clients, Suppliers and Health and Safety.

From the analysis of the information a series of strategies and good practices become clear, resulting from the Group's strategic vision and in line with the aforementioned company values.

This process is supported by independent external consultants who incorporate improvements periodically, both at the functional and procedural levels. Furthermore, the ACS Group's Corporate Responsibility Report is prepared according to the GRI's A+ standard and is verified annually. The ACS Group was selected in the Dow Jones Sustainability Europe Index in 2012.



2.3. ACS Group Governance

2.3.1. Ownership Structure

ACS, Actividades de Construcción y Servicios, S.A., (ACS), the ACS Group's parent company, is a Spanish quoted limited company, the share capital of which totalled €157,332,297 at 31 December 2012, represented by 314,664,594 shares, with a face value of €0.50 per share, fully subscribed and paid up, all of a single class and with the same rights.

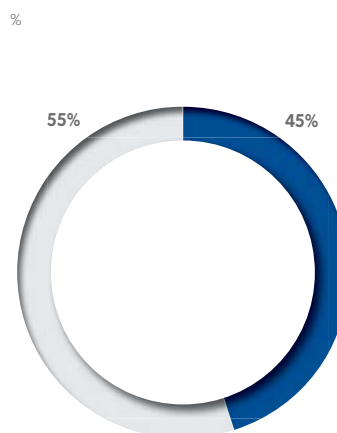
ACS's shares are represented by means of book entries and admitted to trading in all Spain's Stock Exchanges (Madrid, Barcelona, Bilbao and Valencia). You can access the main data relating to the company's ownership structure in real time through the company's corporate website, www.grupoacs.com, and that of the Spanish Stock Market Commission (C.N.M.V.), www.cnmv.es, as reflected in the following table as at 31 December 2012:

| Shareholder's name or corporate name | Number of shares | Percentage of the total number of shares |
|--------------------------------------|------------------|--|
| Corporación Financiera Alba, S.A. | 57,599,232 | 18.305% |
| Inversiones Vesán, S.A | 39,397,625 | 12.521% |
| Southeastern Asset Mananagement, Inc | 29,027.35 | 9.225% |
| Sayglo Holding, S.L. | 17,741,012 | 5.638% |
| Mr. Alberto Cortina Alcocer | 13,858,091 | 4.404% |
| Mr. Alberto Alcocer Torra | 13,803,134 | 4.387% |

The information obtained from IBERCLEAR, the Spanish Central Securities Depository, for the call to the company's most recent General Shareholders' Meeting, held on 31 May 2012, showed a total of 48,280 shareholders. There were 43,789 resident minority shareholders who held 46,971,879 million shares between them. There were 4,491 non-resident shareholders and domestic institutional shareholders with a stake of 268,612,770 million shares.

According to the stated data and bearing in mind those shareholders who, with a share of over 4% of the capital, also have representation on the board of directors, the distribution of capital ownership is as follows:

CAPITAL OWNERSHIP DISTRIBUTION



■ REFERENCE SHAREOLDERS*
■ FREE FLOAT

* Share of over 4% and representation on the board.

2. THE ACS GROUP

2.3.2. Company Administration

2.3.2.1. ACS Governance Structure

It is laid down in the Company' Articles of Association and the Rules of the Board of Directors that ACS will be governed by a Board of Directors made up of a minimum of eleven (11) and a maximum of twenty-one members (21). ACS's Board Members are named according to a procedure to assess their competences, knowledge, experience and dedication to proper fulfilment of their task, carried out by the Board of Directors' Appointments and Remuneration Committee.

As ACS's decision-making body, it falls to the Shareholders' Meeting, at the proposal of the Board of Directors, both to set the exact number of members of the Board, within these limits, and to name the people to occupy these posts.

The composition of the Board of Directors is based on a proportional principle, by means of which the interests of all ACS's groups of shareholders are represented on the Board. In this way, at 31 December 2012, ACS's Board of Directors was made up of 17 Board Members⁶: 4 executive members, 8 members representing major shareholders, 4 independent members and 1 external member. There is one woman board member representing major shareholders, Sabina Fluxà Thienemann. The mission of these independent and external board members is to represent the interests of the free-float capital on the Board of Directors. The Chairman of the Board of Directors, Florentino Pérez, is also the CEO of ACS.

| Board Member | Year of birth |
|---|---------------|
| Florentino Pérez Rodríguez | 1947 |
| Antonio García Ferrer | 1945 |
| Pablo Vallbona Vadell | 1942 |
| Agustín Batuecas Torrego | 1949 |
| José Álvaro Cuervo García | 1942 |
| Manuel Delgado Solís | 1948 |
| Javier Echenique Landiribar | 1951 |
| Sabina Fluxà Thienemann | 1980 |
| Joan-David Grimà i Terré | 1953 |
| José María Loizaga Viguri | 1936 |
| Pedro López Jiménez | 1942 |
| Juan March de la Lastra | 1973 |
| Santos Martínez-Conde Gutiérrez-Barquín | 1955 |
| Javier Monzón de Cáceres | 1956 |
| Miquel Roca i Junyent | 1940 |
| Julio Sacristán Fidalgo | 1940 |
| José Luis del Valle Pérez | 1950 |

2.3.2.2. Governance Procedures in ACS

As regards the function of the Board of Directors, this acts jointly and is granted the broadest of powers to represent and govern the company as the body supervising and controlling its activity, but also with the capacity to assume the responsibilities and decision-making powers directly on the management of the businesses.

In particular, the Board of Directors fully reserves the authority to approve the following general policies and strategies:

- Investment and financing policy.
- Definition of the corporate group structure.
- Corporate governance policy.
- Policy for Corporate Responsibility.
- The Strategic or Business Plan, as well as management targets and annual budgets.
- Senior executive management assessment and remuneration policies.
- The risk control and management policy, in addition to the periodic monitoring of internal information and control systems.
- The policy on dividends, as well as on treasury stock and its limits.
- Related-party transactions, except in those cases anticipated by the Regulations.

For greater efficiency in its functions, a series of Commissions are constituted within the Board of Directors, the task of which consists of controlling and monitoring those areas of greatest importance for good governance of the company. The Board of Directors is currently made up of three commissions: the Executive Commission, the Audit Committee and the Appointments and Remuneration Committee.

The Executive Committee is a delegated committee which can exercise all the Board of Directors' powers except those which cannot be delegated or which the Board reserves as its competence.

⁶ Personal information on ACS's board members can be found on the ACS Group's website: http://www.grupoacs.com/index.php/es/c/gobiernocorporativo_consejodeadministracion.

The Audit Committee has 11 main functions, which are detailed in the ACS Group's Corporate Governance Report (Section B.2.4), outstanding among which are the accounting control functions, supervision of compliance with the ACS Group Code of Conduct and risk management.

Finally, the Appointments and Remuneration Committee has eight main functions, which are detailed in the ACS Group's Corporate Governance Report (Section B.2.4), outstanding among which are control of board member and senior management remuneration and performance, proposals for their appointments and matters relating to gender diversity on the Board of Directors.

The Board Members' remuneration is defined by a general policy approved by the full Board, heeding the recommendations of the Appointments and Remuneration Committee. The total remuneration of the ACS Group's Board Members in 2012 was €10,482 million, 1.48% of the company's ordinary net profit. Within the ACS Group's transparency and information policy, the remuneration received by both the members of the Board of Directors and the Senior Executives during the financial year is shown in the Annual Corporate Governance Report (Section B.1.11).

Assessment of the Board of Directors quality and efficiency of performance is a task which falls to the Board itself and cannot be delegated. It is carried out after receiving a report from the Appointments and Remuneration Committee. Furthermore, the General Shareholders' Meeting submits approval of the Board of Directors' management to a vote every year.

Finally, the ACS Group, through the Rules of the ACS Board of Directors, has detailed rules on the mechanisms laid down for detecting, determining

and resolving possible conflicts of interest between the company and/or its group and its board members, managers or significant shareholders, as detailed in point C.6 of the ACS Group's Corporate Governance Report.

2.3.2.3. Shareholders Rights and the General Shareholders' Meeting

The operation of the Shareholders' Meeting and the rights of the shareholders are regulated in ACS's Company Articles of Association and in the Rules of the Shareholders' Meeting. According to Article 1 of the latter, the Shareholders' Meeting is the supreme body for the expression of the will of the company and its decision making.

As such, according to these Rules, the Group's shareholders represented in the General Shareholders' Meeting will decide all matters within the Meeting's powers by majority. This meeting will be made up of those holders of at least one hundred shares present or represented, such that holders of less than one hundred shares can group together to reach this number.

In addition, shareholders' attendance and voting rights are laid down in these Rules, by means of which egalitarian treatment is guaranteed for all and a series of measures aimed at encouraging shareholders' participation in the General Meeting are included. As such, not only is delegation or representation of votes permitted during the Meeting, but the possibility of shareholders casting their vote remotely is also expressly established. Furthermore, since the Ordinary General Shareholders' Meeting of 19 May 2005, the necessary procedures have been articulated for exercising the right to vote in advance remotely. The measures adopted by the Group to encourage attendance of the Meeting are positively reflected in their attendance percentages.

| Attendance at Shareholders' Meetings | 2009 Ordinary | 2010 Ordinary | 2010 Extraordinary | 2011 Ordinary | 2012 Ordinary |
|--------------------------------------|---------------|---------------|--------------------|---------------|---------------|
| Shareholders Present | 208 | 213 | 115 | 179 | 216 |
| Quorum Shareholders Present | 7.66% | 19.44% | 19.93% | 20.55% | 20.05% |
| Shareholders Represented | 2,763 | 2,776 | 2,183 | 2,792 | 2,368 |
| Quorum Shareholders Represented | 70.88% | 58.22% | 57.11% | 54.41% | 51.40% |
| Quorum Total | 78.54% | 77.66% | 77.04% | 74.96% | 71.45% |

2. THE ACS GROUP

Likewise, the shareholders' and investors' rights to information are detailed in several parts of the Rules of the Shareholders' Meeting. Indeed, all the necessary information is made available to the shareholders prior to holding each Meeting, in that, in addition to the standard information provided by the company in the annual, half-yearly or quarterly reports, the Group maintains a website with all the fundamental data on it. Periodic meetings are also held with analysts for this information to reach both shareholders and the general market in the fairest, most symmetrical and efficient way possible.

The ACS Group not only sets up permanent communications channels with its shareholders and investors, but also ensures that all the information made available to them is truthful and rigorous. The Audit Commission reviews this information before it is transmitted to confirm that it is prepared in accordance with the professional principles, criteria and practices with which the accounts are prepared.

ACS's Board of Directors has, over a number of years, also been promoting measures to guarantee the transparency of the company's action in the financial markets and to exercise as many functions as result from its position as a listed company on the stock exchanges. To this effect, we try to ensure that knowledge of relevant facts is restricted, until made public, to the minimum number of identified people.

2.3.3. Risk Control Systems

The ACS Group's risk control system is based on a range of strategic and operational actions which seek to mitigate risks in addition to fulfilling the objectives set by the Board of Directors.

The diversity and complexity of the sectors in which the Group carries out its activities involve a great variety of risks and the Corporation is responsible for defining the basic guidelines to homogenise operating criteria in each of the divisions and so guarantee an appropriate level of internal control. The companies and divisions of which ACS is made up are responsible for developing the necessary internal regulations so as to implement appropriate internal control according to the particular nature of their activity.

In order to be able to respond in the face of global and homogeneous risk, the Corporation has established a risk management model which includes the identification, assessment, classification, valuation, management and monitoring of risks at the Group and Operating Area levels. Once risks have been located, a risk map is prepared which is systematically updated periodically.



In accordance with that explained above, the following risks have been identified:

- Operational risks, stemming from the Group's different businesses and which vary depending on the area of activity, but which, in short, are related to entering into contracts, planning and control of the execution of the works and projects, quality-related risks, environmental impact and risks related to international activities.
- Non-operational risks, which also stem from the different activities the Group carries out, but which in this case relate to image, human resources, legal or regulatory matters, tax, financial matters and insurance coverage.

As indicated previously, the Group's risk control systems are common to all the Group's areas of activity, but organised according to a decentralised model, which enables each business unit to exercise its risk control and assessment policies in accordance with certain basic principles. These basic principles are the following:

- Definition of the maximum risk limits that may be assumed by each business in accordance with its characteristics and its profitability expectations and which are implemented at the time contracts are entered into.
- Establishment of procedures to identify, approve, analyse, control and report the different risks for each business area.
- Coordination and communication to ensure that each business area's risk policies are consistent with the Group's overall risk strategy.

The systems provide the necessary information to supervise and evaluate the risk exposure of each business area and develop the corresponding management reports for decision making with monitoring of the appropriate indicators.

The control systems developed in each business area may be classified into the following categories:

- Management systems for entering into contracts and bidding processes for works and projects.
- Management systems for planning and execution of works and projects.
- Quality management systems.
- Human resources management systems.
- Financial risk control systems.
- Environmental management systems.
 - Incorporation of the most advanced technologies as regards environmental matters, such as:
 - Conservation of energy and raw materials.
 - Using recyclable and biodegradable materials.
 - Minimising waste production and environmentally-friendly treatment.
 - Promoting the reforestation and landscaping of construction sites.
 - Carrying out specific actions for activities that require them, depending on the effect of the impact and the setting.
 - Informing the client continuously on the environmental risks and possible preventive measures.
- Other systems: For risks of a legal or fiscal type, ACS has appropriate departments in each company, division or at a corporate level and with prestigious external support in each specific field of action. Additionally, the signing of contracts is supervised by each company's legal adviser and, depending on its relevance, by the legal counsel of the different divisions or of the Group.

The Group has a strategy for covering accidental risks which could affect Group assets and activities that involves the underwriting of various insurance policies for any coverable risks. The characteristics of these policies are reviewed periodically to adapt them to the current and specific status of the risk covered.

2. THE ACS GROUP

2.4. The ACS Group and its Stakeholders

2.4.1. Stakeholders

The ACS Group defines stakeholders as groups with the capacity to have an influence on the achievement of the organisation's objectives. Outstanding among them are shareholders, employees, clients, suppliers, infrastructure users and society in general, who benefit from its policies in quality, R&D+i, philanthropy and the environment.

To generate trust and identify these groups, a priority is to keep channels open for honest, plural and transparent dialogue in the ACS Group's various companies, as well as in its fields of action and functional areas, something the ACS Group carries out regularly and in a sustained manner and has done for years.

- Shareholders relate to the company daily through the communications channels established, such as the permanently open website, the shareholder services forum, the Investor Relations Department and the Shareholders' Meeting itself, which is held at least once per year. This relationship is detailed in the Creating Value for Shareholders section.
- The employees are key to carrying out the ACS Group's activities, as a company mainly intensive in human resources. The employees' relationship with the company is continuous, but it is especially intense over the performance assessment period, which usually takes place annually. Personnel policies and management are detailed in the corresponding section of this report. They also have the ACS Group's Ethical Channel available, as detailed in the Ethics and Professionalism section of the Corporate Responsibility Report.
- The relationship with clients and suppliers and how ACS deals with their management is part of the section on Creating Value for clients and suppliers. However, the frequency of the ACS Group's relationships with its clients is practically daily, meaning that there are numerous meetings each year. The relationship with suppliers is also fluid as the Group's purchasing directors and works managers hold frequent meetings, even having weekly contact in large accounts. As with the employees, suppliers have the ACS Group's Ethical Channel available to them.
- The ACS Group's relationship with society in general and in particular with infrastructure users is detailed in the chapters on quality, philanthropy and the respect the Group holds for the Environment. It should be emphasised that the ACS Foundation holds several meetings each month with organisations in the civil field with the aim of defining its philanthropic activities. Furthermore, the ACS Group's various Environment departments analyse the environmental needs and risks affecting society several times each year and, especially, every time that general plans are dealt with in this subject within the company or Environmental Impact Studies are undertaken.



ACS has defined its form of committing itself to its stakeholders through its five commitments to sustainability.

- Commitment to creating value:**
 Laying out ACS's efforts to **distribute the wealth created** among its shareholders, clients, employees, suppliers and among society as a whole.
- Commitment to integrity:**
 In order to demonstrate the ACS Group's **ethical and professional conduct with complete transparency**, as well as the self-imposed demands in this field through its employees and the relationship with its clients and suppliers.
- Commitment to technological development:** Detailing the ACS Group's contributions to **technical and technological development** as a means to promote the sustainability of the ACS Group's activities and hence improve its contribution to society.
- Commitment to the natural environment:** As a set of programmes contributing to minimising the impact of the ACS Group's activities and promoting a commitment around the fight against climate change, respect for biodiversity and efficient use of energy and water resources.
- Commitment to the social setting:** Embodied in ACS's efforts to **generate well-paid, high-quality work based on equal opportunities**. Work which contributes to **creating wealth** and **contributing to the well-being** and prosperity of the societies in which it operates.

The ACS Group sets its Corporate Responsibility activities and its relationship with its Stakeholders in context in accordance with these commitments which the company adopts voluntarily and responsibly.



2. THE ACS GROUP

2.4.2. Transparency in Institutional Relationships

The ACS Group is an organisation with a very significant impact on social, labour, economic and political fields in those countries in which it operates. This impact is managed directly by ACS's Chairman, Florentino Pérez, and his team. In this respect, it is important to highlight the influence that ACS has on the decision making or behaviour of those levels and clients with whom it habitually relates.

ACS incorporates responsibility into its whole organisation and its daily practices, sharing knowledge, information and experience. It also carries out projects in collaboration, promotes fair practices, builds alliances with organisations, associations and other sector members, working in a responsible manner and open to dialogue and attending to calls from Government and from the industrial institutions representing its sector.

In short, through its businesses, ACS intervenes in its environment with the intention of contributing voluntarily and actively to social improvement, complying with the law and additionally developing policies and initiatives which boost the excellence and quality of its activities. The ACS Group Chairman is the leading exponent of this policy.

The nature of ACS's political and institutional relationships is augmented by the presence of its Chairman in the most important political and business meetings⁷, as well as in various public functions, always guided by the ethical principles of social responsibility and the intention to improve competitiveness and general and added value.

⁷ The ACS Group made no financial or in-kind contributions to political parties during 2012.

The Subsidies received by the ACS Group in 2012, as shown in the Group's Consolidated Balance Sheet, included in the Economic/Financial Report published together with this Report, totalled €54 million.



3. CORPORATE RESPONSIBILITY AND THE ACS GROUP

3.1. The ACS Group's Main Indicators in CR

| | 2011 ⁸ | 2012 | 2015 forecast |
|--|-------------------|--------|---------------|
| Recurring earnings per share (euros) | 2.49 | 2.24 | 2015e>2012 |
| Gross dividend per share (euros) ⁹ | 2.05 | 1.97 | 2015e≥2012 |
| Clients satisfied or very satisfied | 84.5% | 86.1% | 2015e≥88% |
| Production certified under ISO 9001 | 77.14% | 72.47% | 2015e≥75% |
| Production certified under ISO 14001 | 72.56% | 67.96% | 2015e≥70% |
| Economic value generated (millions of euros) ¹⁰ | 55,940 | 73,744 | 2015e≥75,000 |
| Investment in training (euros/employee) | 114.71 | 163.43 | 2015e≥170€ |
| Rate of construction and demolition waste recovery | 61.55% | 63.87% | 2015e≥65% |
| Investment in R&D+i / recurring net profit | 5.87% | 6.96% | 2015e≥7% |
| CO ₂ emissions (t) / Production (millions of euros) | 61 | 41 | 2015e≤35 |
| Water Consumption / Production (m ³ /million euros) | 196 | 174 | 2015e<180 |
| Frequency Rate ¹¹ | 24.43 | 27.84 | 2015e≤30 |
| Investment in social initiatives / recurring net profit | 0.40% | 0.55% | 2015e≥0,5% |

The development of these indicators between 2011 and 2012 is based to a great extent on the increased scope of the data, as a result of the inclusion of HOCHTIEF Europe, Americas and Leighton. These companies have different sustainability policies, which are still in the process of converging with the ACS Group's traditional policies.

⁸ Includes information for Hochtief in 2011 and 2012, but not for 2010 and 2009. Clece is not included in 2011 and 2012, as it was reclassified as an asset available for sale. For further information on the scope of the data, see section 11 of this document.

⁹ Referring to the dividend paid in the year.

¹⁰ The target has been reformulated to make it coincide with the datum for the economic value generated defined as relevant for the ACS Group.

¹¹ See point 8.2.3



4. COMMITMENT TO CREATING VALUE

4.1. The Value of our Businesses

ACS is committed to creating value for all its stakeholders. Providing growing and sustained profitability is one of the company's main objectives.

| | 2011 | 2012 |
|--|--------|--------|
| Net revenue (millions of euros) | 28,472 | 38,396 |
| Gross operating profit. EBITDA (millions of euros) | 2,318 | 3,088 |
| Total gross investments (millions of euros) | 4,755 | 2,496 |
| Recurring net profit (millions of euros) | 782 | 705 |
| Net debt (millions of euros) | 9,334 | 4,952 |

ECONOMIC VALUE GENERATED

€ MILLION

| | 2011 | 2012 |
|---|--------|--------|
| Net revenue | 28,472 | 38,396 |
| Operating costs | 20,355 | 27,031 |
| Staff costs | 6,319 | 8,681 |
| Payments of direct remuneration to shareholders (Dividends) | 614 | 639 |
| Taxes | 181 | -1,003 |



4.2. Shareholders

Milestones 2012

Servicing of 364 shareholder questions and/or problems, of which the shareholders declared themselves unsatisfied in only 5 cases.

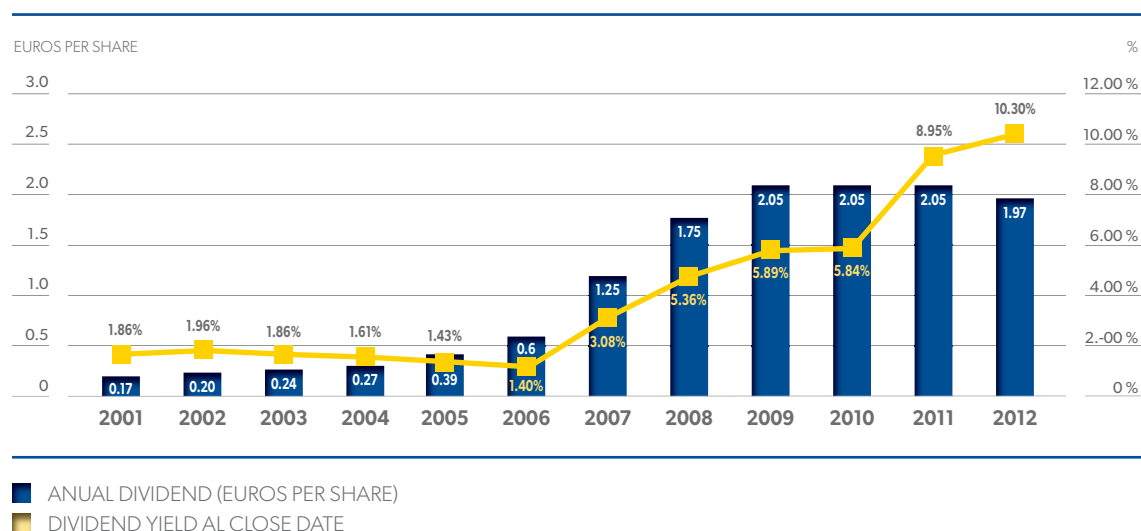
Approval of a remuneration system using optional dividends in cash or shares, which came into effect in July 2012 and complemented the February 2012 interim dividend.

Challenges for 2013

To develop the ACS Group's business strategy based on three main objectives: promoting the global growth of the company, increasing profitability and reducing net debt.

| ACS stock | 2010 | 2011 | 2012 |
|--|----------------|----------------|----------------|
| Closing Price | € 35.08 | € 22.90 | € 19.04 |
| Appreciation of ACS shares | 0.76% | -34.71% | -16.86% |
| Appreciation of the IBEX35 | -17.43% | -13.11% | -4.66% |
| Maximum closing price | € 38.38 | € 37.94 | € 25.10 |
| Minimum closing price | € 28.91 | € 21.75 | € 10.38 |
| Average price over the period | € 33.58 | € 29.67 | € 16.77 |
| Total volume (thousands) | 193,764 | 220,147 | 227,383 |
| Average daily volume of shares (thousands) | 757 | 857 | 888 |
| Turnover (€ million) | 6,507 | 6,531 | 3,812 |
| Average daily turnover (€ million) | 25.42 | 25.41 | 14.89 |
| Number of shares (millions) | 314.66 | 314.66 | 314.66 |
| Capitalisation at the end of the period (million) | 11,037 | 7,206 | 5,991 |

ACS as a company is highly committed to shareholder returns and dedicates a significant amount of funds to the annual payment of dividends.



Likewise, considering the concept of total return for shareholders, an investor who purchased an ACS share on 31 December 2000 would have obtained an annual yield of 14.30% at the end of 2012. If the shareholder had invested €100 on that

day, he or she would have had €497.17 at the end of 2012, hence his or her investment would have appreciated 4.97 times. Total shareholder return includes market appreciation and the dividends paid by the ACS Group.

4. COMMITMENT TO CREATING VALUE



4.2.1. Communication with Shareholders

The Group's commitment to the markets, shareholders and investors is upheld in its information transparency. As such, and in order to offer them the best service, the company has specific communications procedures, as detailed in the section on transparency in this document. As a summary, the following stand out among these:

- **Relationship with investors.**

A total of 116 meetings were held in different places worldwide. These meetings enable the Group to pass information on its prospects and on relevant events which may affect the company or its sector. Specific events are also held regularly, of which 7 took place in 2012.

- **Shareholder service.**

Service is provided from the Investor Relations Department to numerous minority shareholders seeking to resolve doubts and obtain detailed information on their investment. In 2012, 364 problems raised by the shareholders were dealt with, of which 98.6% received a satisfactory solution to the problem (as stated by the shareholders) and only 1.4% expressed dissatisfaction.

- **Communications with financial analysts and institutional investors.**

Regular sending of information of interest to those analysts and investors who follow the Group most closely.

- **Participation in conferences and seminars of interest.**

- **Corporate Website and start-up of the Shareholder Services Web Forum.**

4.3. Clients

2012 Milestones

DRAGADOS

Obtaining of Approvals and Classifications as regular Suppliers for executing civil works for large Energy companies (Spanish grid operator - REE, Endesa, Repsol, Enagás, Gas Natural, etc.) corresponding to its strategic Generating, Supply and Distribution activities.



Collection of over 90% of the debt contracted with Public Bodies up to December 2011, thanks to the Supplier Payment Plan established by the Government in early 2012.



Formalising of the filtering of "A" clients based on the economic/financial criteria of the contracts signed and linking to the high-end client satisfaction analysis. Follow up with "A" clients to improve loyalty.

VIAS

Consolidation of VÍAS' entry into the international market with the awarding of two works in Poland. Outstanding among these is the project for "Modernisation of Siedlce, Łuków and Międzyrzecz stations on the E20/CE20 line, Phase II", awarded with a budget of €127.5 million.



Successful completion and delivery of the Navoi 478 MW combined cycle power plant, the first combined cycle facility to go into operation in Uzbekistan.

Dragados Offshore

Contracting for the Mariner Project in Spain to design and build the largest steel jacket built by the company.



Consolidation and expansion of the implemented Document Management System. Updating of this system with client financial risk data and operations with these clients.

Challenges for 2013

DRAGADOS

Increased market penetration in Restoration of Institutional Buildings, Shopping Centres, Office Buildings and Hotels by contributing technical Sustainable architecture and Energy efficiency solutions in Project preparation.



Thorough analysis of cash flows, with the aim of continuing to improve the company's Working Capital. Its exhaustiveness will involve analysis at work order level, examining the evolution of net margins for each of them.



Review of "B" client contractual conditions. Analysis of improvements in "Perceived quality" by "A" clients. Portfolio consolidation according to economic/financial variables and sector situation.

TECSA

Classification renewal with ADIF.

POL-AQUA

Consolidation of the Dragados brand in the market and support to Polaqua.

DRAGADOS POLAND

Strengthening of relations with two of the company's main clients; GDDKiA (Roads Department) and the PKP (Railways Department).



Implementation, through the Quality Management System, of a new procedure to measure client satisfaction by avoiding surveys and focusing on certificates of good execution of works.



Adaptation of the methodology for measuring client satisfaction.

4.3.1. Strategy

The commitment to clients is one of the ACS Group's most important corporate values. Not for nothing is there a high level of trust between the client and the Group, thanks to the high added value services the company offers throughout time, promoting this close relationship.

This commitment to its clients is tackled from a clear strategy based around the following points:

- Problem-solving orientation.
- Client relationship feedback.
- Information on the ACS Group's capabilities.
- Identification of future needs and opportunities for collaboration.

In addition, the ACS Group seeks appropriate solutions to improve its approach to the client, particularly in technological matters of importance. This leads to the search for collaboration with detail engineering companies, specialised in the specific field required for each project. The most suitable alliances are created for each case in this way and, as such, the final client can be offered the best technical and economic solution.

Another important value for the Group's businesses is confidentiality. ACS Group companies' contracting and client relationship departments carry out periodic initiatives to promote responsible use of information, so guaranteeing client confidentiality.

4. COMMITMENT TO CREATING VALUE

4.3.2. Management Principles

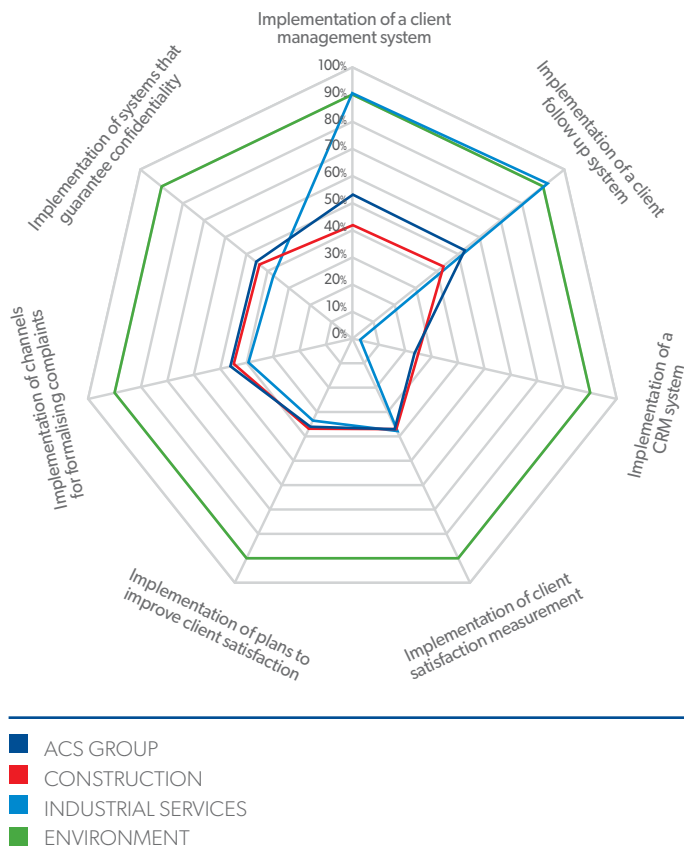
Given the characteristics of ACS's business, where large infrastructure projects are carried out or general agreements are entered into for the provision of services (such as the cleaning of a city or maintenance of an electricity grid), the number of clients with whom ACS deals is very limited or they are large corporations or public institutions from around the world.

In 2012, companies representing 52.8% of ACS Group¹² sales reported the existence of a client management system, managed by each company's contracting department. The management aspects common to the whole ACS Group are as follows:

- Monitoring of client needs.
- Periodic measurement of client satisfaction.
- Guarantee of confidentiality.

¹² The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2012.

THE ADOPTION LEVEL OF THE MAIN MANAGEMENT PRINCIPLES IN THE GROUP IS SUMMARIZED IN THAT CHART:



Level of implementation as reported by ACS Group companies and according to the level of sales of each of them.

4.3.2.1. Monitoring and Communication

Formally, companies representing 55.6% of ACS Group sales hold regular meetings with clients, through those responsible for each project, or continuously if, as occurs in exceptional projects, the client dedicates resources to production control.

This is how objectives, monitoring systems and client information plans are defined for each project and in line with the specific aspects of each company. Control points for important phases of production are established in these plans, along with certification meetings to manage the partial payments for the work and partial monitoring points which may come to mean daily contact between the supervisor and the client in order to reinforce the latter's confidence.

Similarly, computerised CRM systems are being implemented to collect information relating to clients, in order to facilitate analysis and the carrying out of actions to improve satisfaction. In 2012, companies representing 24.3% of ACS Group sales had a system of this type in operation.



4. COMMITMENT TO CREATING VALUE

4.3.2.2. Client Satisfaction

ACS's second key client relationship management policy is the measurement of their satisfaction. Companies representing 37.2% of ACS Group sales carry out this type of process, either in a standalone form or within the framework of quality management systems. These vary according to the characteristics of the services provided by each company, but they share some common elements:

- Companies representing 17.5% of ACS Group sales identify the worst and best rated aspects of the service provided.
- Similarly, Group companies representing 36.3% of sales implement measures and plans to improve client satisfaction.
- The great majority of the Group's companies, those representing 45.0% of sales, include a system for managing complaints and penalties in contracts.

A reflection of the quality of client service is shown in the fact that no fines were received for failure to comply with the standards the ACS Group received in 2012.

A study was carried out on the aspects rated best and worst by the clients. Worthy of highlighting among the best rated are:

- The proactivity shown by Group companies to resolve problems and unforeseen events.
- The qualifications, experience and technical quality of the Group's teams.
- The existence of a detailed, structured and exhaustive client needs monitoring process.

Outstanding among the worst rated are:

- The works delivery periods and the delays which occur on occasions.
- The difficulty in controlling the agents involved in the project, such as subcontractors and suppliers.
- The perception of price against the quality of the products.

| Client Satisfaction | 2010 | 2011 | 2012 |
|---|---------|---------|-------|
| Number of satisfaction surveys carried out | 1,211.0 | 1,042.0 | 997.0 |
| Percentage of "satisfied" or "highly satisfied" responses | 85.6% | 84.5% | 86.1% |

| Complaints | 2010 | 2011 | 2012 |
|--|---------|---------|---------|
| Number of complaints received | 1,491.0 | 2,683.0 | 2,815.0 |
| Percentage of complaints dealt with | 88.3% | 97.5% | 98.8% |
| Porcentaje de reclamaciones solventadas satisfactoriamente | 75.7% | 74.1% | 84.9% |

4.3.2.3. Guarantee of confidentiality

A key aspect in the ACS Group's relationship with its clients is the guarantee of confidentiality in the Group's management system. From the analysis carried out, it was found that companies representing 39.8% of ACS Group sales have implemented systems guaranteeing client confidentiality.

In this regard, a study was carried out on the percentage of complaints received in 2012 of the total related to confidentiality problems and it was determined that none came from this cause.

4.4. Quality

2012 Milestones

DRAGADOS Development of a guide for improving the installation, commissioning and start up process for auxiliary installations on site.

cobra GRUPO Expansion of certification scope in order to be more competitive in the bid presentation phase. (Obtaining certification under DIN 18800, EN 1090, EN ISO 3834, among others).

HOCHTIEF EUROPE HOCHTIEF Europe obtained numerous "Sustainable building" certifications in 2012.

urbaser Expansion of ISO 9001 certification scope to sports facility management, hydrocarbonated water treatment and out of service tyre storage activities.

DRACE Infraestructuras Certification of all company activities after the merger process between DRACE Medio Ambiente and Flota Proyectos Singulares.

POL-AQUA Obtaining quality certifications and introduction of a new quality control system.

SIGE Improvement in percentage of project delivery on schedule by the company.

Challenges for 2013

DRAGADOS Implementation of the computer tools for optimising works activity monitoring and control processes.



ISO 9001 certification:

- The Urbaser-Interjardín joint venture (Santa Cruz de Tenerife gardens),
- For integral water management activity in SOCAMEX, S.A.
- KDM Energía (Chile).
- For Urbaser Environnement (France) street cleaning activity.



Expansion of certification scope in order to be more competitive in the bid presentation phase.



Development of a common procedure for generating tender proposals in the company.



Improvements in the client satisfaction survey monitoring and control process.



Implementation of the MANTIS tool for managing non-conformities and incidents in all ETRA GROUP companies



Preparation of a balanced scorecard.

4.4.1. Strategy

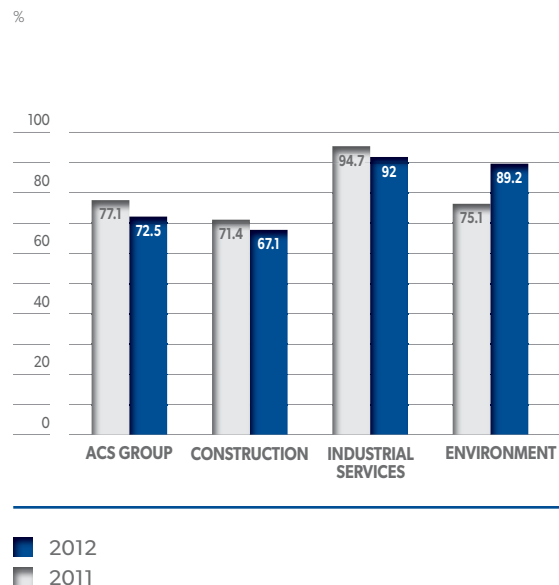
Quality is a determining factor for the ACS Group, as it represents the factor distinguishing it from the competition in the infrastructure and services industry, with high technical sophistication.

The Quality Department in the Group's different companies is the entity responsible for implementing their own Quality Management Systems. Companies representing 76.1% of ACS Group sales¹³ had some form of quality management system in 2012. In this period and as a consequence of these systems, the ACS Group invested a total of €13.37 million in promoting quality.

These quality systems are audited regularly in order to certify Group activities, mainly according to the ISO 9001 standard, held by companies representing 72.5% of the Group's sales. In 2012, companies representing 36.2% of the Group's sales carried out independent audits. A total of 1,556 quality audits were carried out in the year.

¹³ The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2012.

PERCENTAGE OF PRODUCTION CERTIFIED UNDER ISO 9001



4. COMMITMENT TO CREATING VALUE

4.4.2. Management Principles

Each company in the group adapts its needs to the specific characteristics of its type of production, but a series of common lines of action have been identified within their Quality Management Systems:

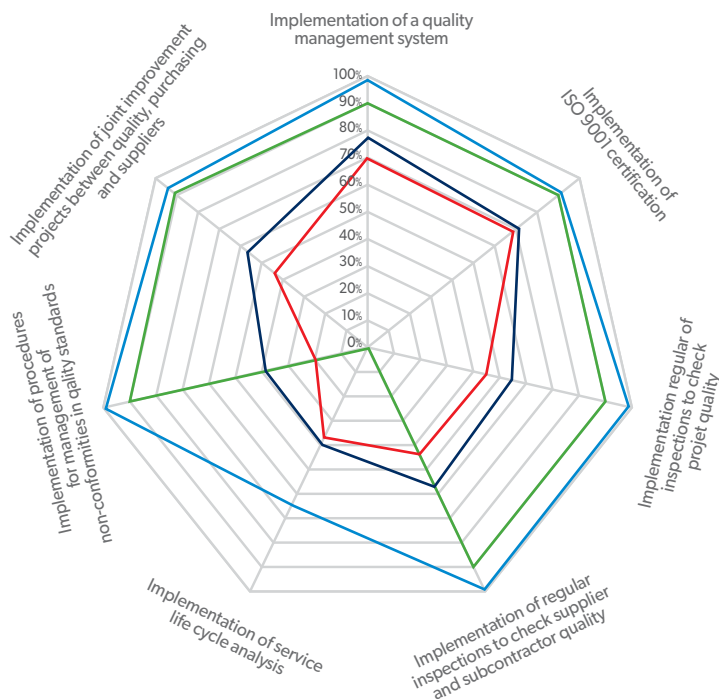
- **Objectives** are set periodically as regards quality and their fulfilment is assessed.
- **Initiatives and actions** are carried out aimed at improving the quality of the services provided.
- Specific actions are carried out in **collaboration with suppliers and subcontractors** to improve quality.

- Systems are implemented for analysis of **Product and Service Life Cycle** when necessary.

Deriving from continuous improvement of processes is the control and management of non-compliances as regards quality, an important characteristic of the ACS Group companies' management system, present in companies representing 36.8% of total turnover in 2012.

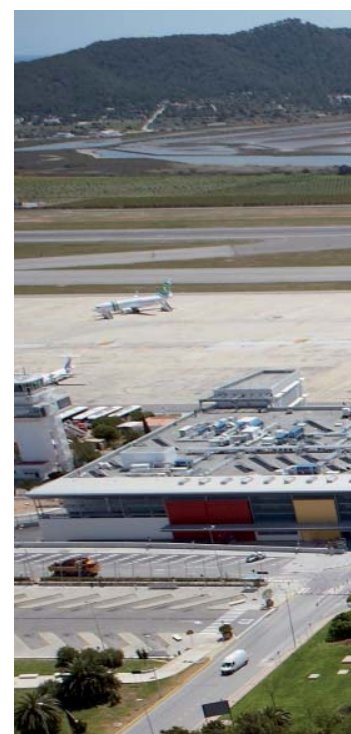
Adoption of the main Quality Management parameters in the ACS Group is summarised in the following graph:

THE ADOPTION LEVEL OF THE MAIN MANAGEMENT PRINCIPLES IN THE GROUP IS SUMMARIZED IN THAT CHART:



- ACS GROUP
- CONSTRUCTION
- INDUSTRIAL SERVICES
- ENVIRONMENT

Level of implementation as reported by ACS Group companies and according to the level of sales of each of them.



4.4.2.1. Objectives

The quality management for the ACS Group's various companies sets general quality objectives for the following financial year. In 2012, companies representing 36.4% of ACS Group sales defined formal objectives in this respect.

According to its characteristics, each project or work adopts the general objectives applicable to it, which generally focus on obtaining, renewing or expanding quality certifications, especially when a Group company develops a new technique or expands its activity into a new geographical area.

At the same time, another common aspiration is to minimise incidents through quantifiable improvement activities, as well as to obtain information relating to clients.

In this aspect, the processes in this area are improved as a consequence of management of non-compliances as regards quality, an important characteristic present in companies representing 36.8% of total turnover in 2012.

The most important objectives reported by the ACS Group's companies can be summarised in the following overall framework:

- Obtaining and expanding the scope of certifications.
- Implementation of tools to improve quality.
- Improvement of specific performance indicators.
- Improving the process of installation, start-up and operation of on-site manufacturing plants in Dragados.
- Improving the training of supervisors, operators and works managers.
- Increasing client satisfaction indices, reducing complaints due to problems in execution.
- Meeting delivery schedules globally and with maximum quality.
- Increasing the number and capacity of internal quality auditors.



4. COMMITMENT TO CREATING VALUE

4.4.2.2. Improvement Initiatives and Actions

The concern with quality in all the group's companies reflects not only the effort to achieve the objectives set, but also the specific actions by the companies. A significant percentage of the Group's companies carry out quality improvement actions. According to the reported data, companies representing 42.5% of ACS Group sales carried out at least one initiative of this type in 2012.

4.4.2.3. Collaboration with Contractors and Suppliers

To a great extent, ACS Group companies carry out a large part of their activities by means of the use of services from suppliers and subcontractors, who collaborate to a significant degree in project execution. In order to guarantee an appropriate level of quality in the provision of services from suppliers and contractors, companies representing 56.1% of ACS Group sales include clauses in contracts demanding a guarantee of a minimum level of quality, which generally depends on the supplier or subcontractor having certification to ISO 9001, among other measures.

Furthermore, as will be seen later in the section on suppliers, the purchasing and supplier contracting departments, together with quality departments, carry out monitoring and audits of performance in terms of supplier quality once the works or contracts for service provision are complete. This permits the proposal of corrective measures if areas for improvement are found or may even lead to cessation of collaboration with the supplier or subcontractor in future projects. In 2012, companies representing 56.1% of ACS Group sales reported making such checks. Some of these include reviews of various environmental criteria in projects.

In line with this control initiative, corrective measures have been implemented in the supplier quality processes in companies representing 33.0% of ACS's sales, and it was seen that in the case of a clear breach in relation to supplier performance, companies representing 33.0% of Group sales have mechanisms for cancelling contracts or rescinding relationship agreements.

In Group companies where collaboration with third parties is relevant, joint procedures are promoted between the quality department and its equivalent in the suppliers and the purchasing department and those of the suppliers to identify projects for collaboration to improve quality. In 2012, companies representing 54.7% of ACS Group sales carried out such joint improvement processes, among which traditionally were included the integration of optimisation and improvement processes, inspections and various collaborations with companies and universities. Corrective measures were implemented in supplier's quality processes in companies representing 33.0% of ACS Group sales.

4.4.2.4. Life Cycle Analysis

Life cycle analysis is an innovative tool which permits improvement opportunities to be identified in industrial processes, in harmony with the reduction in the impact of the services on the environment and on health and safety.

Various Group companies are making progress with the adoption of this approach. In 2012, companies representing 38.5% of sales reported these types of practices.

From the start of the project itself, periodic inspections are carried out to check compliance with quality standards, as shown by the fact that companies representing 56.1% of the ACS Group sales carry out regular inspections to check quality. In such inspections, 36.3% of the total projects accounted for in the 2012 study were audited. Last year 124 incidents of non-compliance with the regulations as regards quality resulting in a warning or fine were recorded.

Likewise, the life cycle analysis of products and services to improve quality extends to supplier's and subcontractor's activities, a procedure implemented in 19.7% of the ACS Group.

4.5. Suppliers¹⁴

2012 Milestones

DRAGADOS Purchases made from suppliers with ISO 9001 certification increased to 20% and those from suppliers with ISO 14001 to 15% and the clause on monitoring human rights was included as a general clause.

cobra GRUPO Change to the subcontractor and material supplier payment system. These payments started to be made from the central offices, whereas they were previously made from the local offices. Improved control over Working Capital is sought with this for each works order.

HOCHTIEF EUROPE Renewal and improvement of agreements with local suppliers in Germany, among others with Arcelor Mittal

Leighton Holdings The purchasing and provisioning function was centralised at Leighton Group level for the first time in 2012. To this end, a central department head was designated and a purchasing and provisioning plan developed, which was published in August 2012.

Turner Start up of the new subcontractor prequalification system
Renewal and improvement of agreements with local suppliers in the US.

urbaser The application for comprehensive machinery management (GIM) was partially developed to provide a solution for managing the Urbaser group's fixed machinery (basically considering fixed machinery in treatment plants).

VIAS Included in the automatic data collection process are data corresponding to PVC consumption and to the percentage of recycled materials used in works.

IRIDIUM An initial and continuous general assessment of all suppliers has been carried out, with satisfactory results.

SEMI Implementation of the purchasing management process through the NAVISION tool in all local offices in Spain.

Challenges for 2013

DRAGADOS To increase purchase from suppliers with ISO 9001 certification to 25% of the total, to 15 - 20% from suppliers with ISO 14001 certification and implementation of purchasing application in 100% of joint ventures.

cobra GRUPO Implementation of a digital payment approval system, consisting of accepting all orders for payment and purchasing from those in charge by computer, abandoning paper and handwritten signatures. This system will enable a purchase to be made from anywhere in the world.

HOCHTIEF EUROPE Development of the computerised system for supplier management, with the aim of improving processes such as supplier prequalification, their assessment and developing relationships To improve the relationships with critical partners and suppliers in the industry.

Leighton Holdings To improve the relationships with critical partners and suppliers in the industry. Making cost savings by aggregation of orders and costs. Development of a training programme in purchasing and provisioning for works managers to improve their capabilities in this regard

Turner Development of training programmes for the new computer system. To adapt company policy to the new computer system and the procedures related to it.

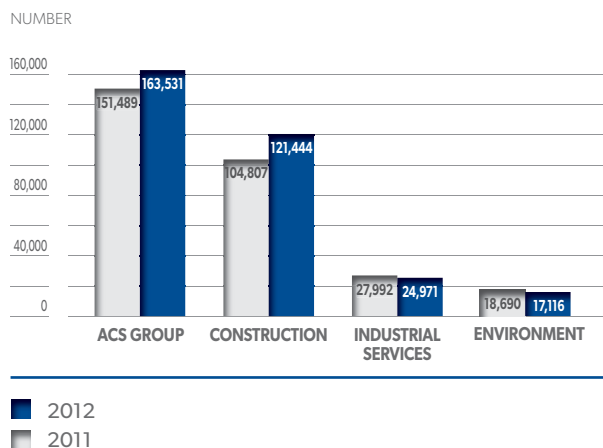
urbaser Development of a spares purchasing portal for the group's mobile machinery.

POL-AQUA Centralisation of Polaqua's purchasing service.

MASA Process for reviewing all local contracts and integrating Corporate Policy into those contracts. Project to maximise synergies with main suppliers

imesAPI Reduction of the timescales for checking supplies and compliance of invoices by the local offices.

NUMBER OF SUPPLIERS BROKEN DOWN BY BUSINESS LINE



¹⁴ The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2012.

4. COMMITMENT TO CREATING VALUE

4.5.1. Strategy

In Group companies, the purchasing department manages the relationship with suppliers and contractors by means of specific systems for managing, classifying and approving them.

In carrying out this activity, ACS manages three types of suppliers:

- Suppliers of materials and/or services defined by the client.
- Suppliers of services or subcontractors contracted by the ACS Group.
- Materials suppliers contracted by the ACS Group.

In the first case, in which an ACS Group company carries out a project in which the client defines the type of suppliers contractually, as well as the quantity and characteristics of the materials to be used, the Group companies, in general, obey these requirements. Even so, the ACS Group's purchasing and suppliers departments have a control procedure established to verify the efficiency of the supplier designated by the client.

This contracting format, in which ACS has very little capability for managing the suppliers, is not watertight as, as mentioned in the section on clients in this report, the Company carries out feedback actions with the client. This means that, in cases in which the suppliers defined by the client have given problems or presented areas



for improvement, the client will be notified of these and corrective measures will be promoted.

It is worth highlighting that, once the special features of the different markets in which the ACS Group is present have been considered, specific purchasing procedures are developed when necessary to increase competitiveness.

For the suppliers of services and materials which the ACS Group contracts, detailed management and control processes are defined. These have the following points in common in all the Group's companies:

- There are specific standards and a system for management, classification and approval of suppliers and subcontractors.

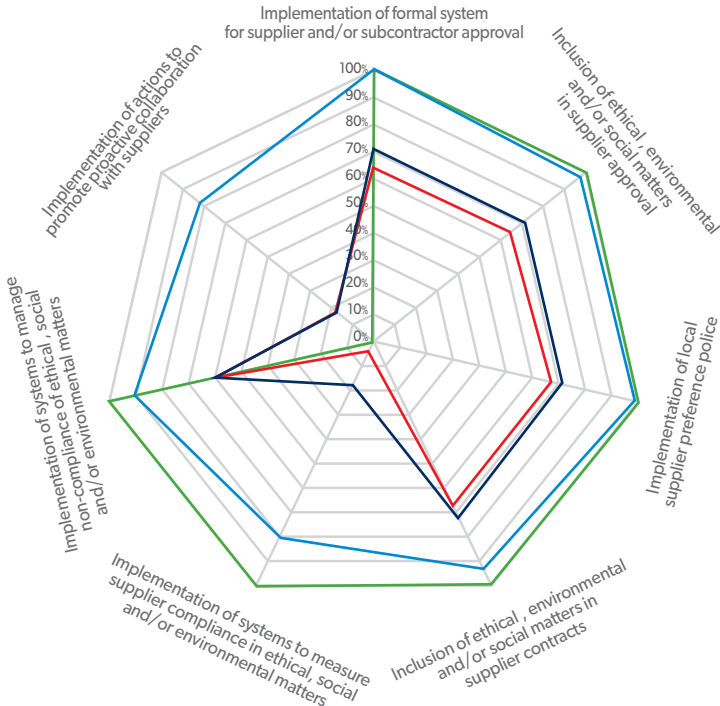
- The level of compliance with these systems is assessed.
- Collaboration with suppliers and transparency in contractual relationships are promoted.

4.5.2. Management Principles

The adoption of the main Supplier Management parameters in the ACS Group is summarised in the following graph:



THE ADOPTION OF THE MAIN SUPPLIER MANAGEMENT PARAMETERS IN THE ACS GROUP



- ACS GROUP
- CONSTRUCTION
- INDUSTRIAL SERVICES
- ENVIRONMENT

Level of implementation as reported by ACS Group companies and according to the level of sales of each of them.

4. COMMITMENT TO CREATING VALUE

4.5.2.1. Contract Approval and Management

According to the data analysed, companies representing 72.9% of ACS Group sales have a formal system for approving suppliers and subcontractors. In these processes, ACS Group companies classify suppliers as critical (or essential) or circumstantial, according to the following concepts:

- Experience, professional prestige and technical capability.
- History of fulfilment of contractual clauses in their prior relationship with ACS.
- Proximity to the work centre, giving preference to local suppliers (89.2% of suppliers were from the local community in 2012, these being suppliers which do not receive international payment).
- Additional financial criteria or labour, ethics, health and safety and environmental matters.

With respect to the latter criterion, companies representing 73.2% of ACS Group sales formally include matters of an ethical, environmental and/or social type in their approval processes.

Likewise, there are procedures, policies or regulations which formalise and standardise commitments in matters of a social, environmental and/or ethical nature with suppliers, in companies representing 72.2% of ACS Group sales.

Furthermore, companies representing 73.0% of ACS Group sales give preference in their supplier and subcontractor selection processes to local companies. This is an initiative which also promotes the development of new enterprises.

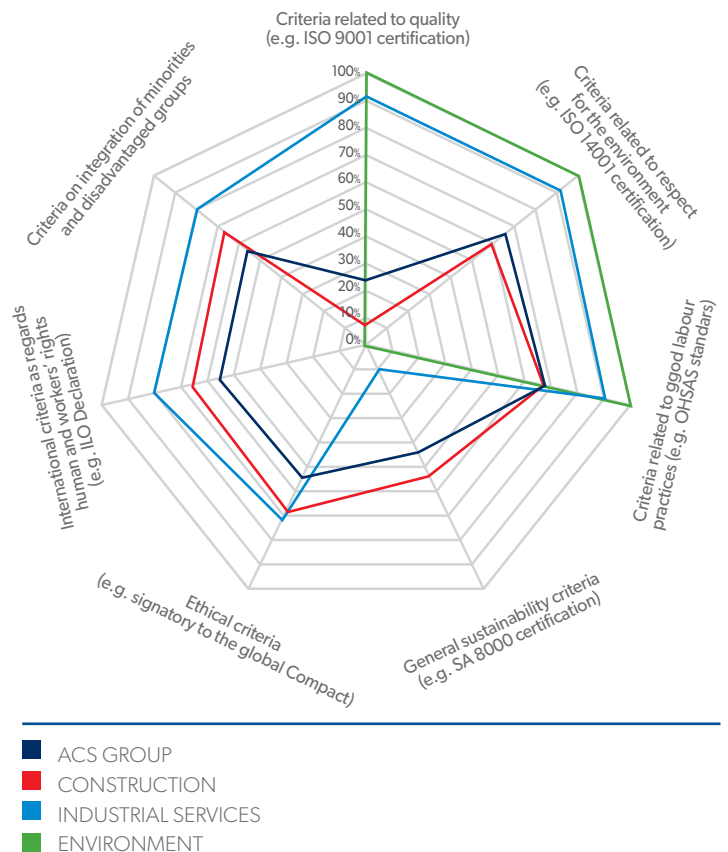
Additionally, there is solid implementation of good practices in the ACS Group when drawing up contracts with non-financial/economic clauses, as shown by the fact that companies representing 73.1% of ACS Group sales already include some type of clause of an ethical, social or environmental nature.

Specifically, the most widely used clauses are environmental ones, which are included in 100.0% of contracts with these characteristics, followed by social clauses, present in 84.6% of contracts with these characteristics and lastly ethical clauses, included in 19.8% of all contracts with these characteristics.

In 2012, likewise, 40.0% of contracts signed included clauses or criteria on human rights.

En concreto, y en relación con cuestiones no económicas, se han detectado los siguientes grados de implantación de buenas prácticas en la homologación de proveedores y subcontratistas:

SPECIFICALLY, AND IN RELATION TO NON-ECONOMIC MATTERS, THE FOLLOWING LEVELS OF IMPLEMENTATION OF GOOD PRACTICES IN SUPPLIER AND SUBCONTRACTOR APPROVAL WERE DETECTED



4.5.2.2. Compliance

The system for guaranteeing compliance with contractual clauses and agreements with suppliers to the Group's companies is based fundamentally on detection and on corrective measures or management of non-compliance.

In the case of the initiatives for detection and control, the policy is based on regular audits, both internal and independent. In this case, companies representing 18.8% of ACS Group sales report that they carry out internal supplier audits and those representing 17.8% report that they carry out independent audits.

Furthermore, it was reported that there are self-assessment systems for suppliers in companies representing 20.0% of sales for 2012. The intention with these processes is to update and optimise the supplier selection systems.

The corrective measures taken in cases of poor performance are adapted taking the following circumstances into account:

- If it is a critical supplier for the company, the reasons for the negative assessment are analysed and initiatives proposed to strengthen the identified areas for improvement including, among others, training and collaboration activities.
- If the company is not critical for the company, it is deleted from the database.

In addition, companies representing 59.4% of ACS Group sales reported the existence of procedures for managing non-compliances in relation to contractual commitments of an ethical, social and/or environmental nature. Only 0.9% of contracts rejected or modified in 2012 failed to comply with environmental, quality and/or human rights matters and/or the ACS Group's ethical standards.

In these cases, collaboration initiatives are also promoted and the cancellation of the contracts can result.

4.5.2.3. Collaboration and Transparency

Companies representing 15.9% of Group sales report proactive collaboration initiatives with suppliers.

The main activities for collaboration are based on training which, generally, is made up of courses in various subjects such as quality, the environment, safety and the execution of works.

Another central aspect in the Group's supplier management is transparency. Along these lines, various Group companies are standardising general contracting and purchasing terms and conditions for all services, equipment and materials contracted. These are used in all processes, hence the same high standards and determining factors are maintained for all the company's suppliers and also within each tendering process.

4.5.2.4. Analysis of Critical Suppliers

The ACS Group carries out detailed analysis of its critical suppliers in order to quantify the risk related to provisioning and to analyse reciprocal importance between supplier and client, without forgetting aspects related to sustainability in the process. Fifty-seven per cent of costs in the last three years, including 2012, have been subject to this analysis.

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For 15% of these, ACS Group companies are preferential clients as they represent 30% or more of their annual turnover.

The following results derive from the detailed analysis of the risks related to these critical suppliers:

Analysis of Critical Supplier Risks

| | |
|--|-----|
| Critical suppliers included in the risk analysis carried out | 28% |
| Suppliers with a high level of risk for the company | 7% |
| Percentage of high-risk suppliers audited in 2012 | 25% |

5. ETHICS, INTEGRITY AND TRANSPARENCY IN THE ACS GROUP

5.1. Ethics and Integrity: Summary, Objectives and General Principles

The ACS Group and the companies which make it up are fully committed to promotion, reinforcement and control in matters related to ethics and integrity, through measures which enable them to prevent, detect and eradicate bad practices.

The ACS Group promotes knowledge of the general principles of conduct, ethics and integrity by all employees, clients, suppliers and contractors.

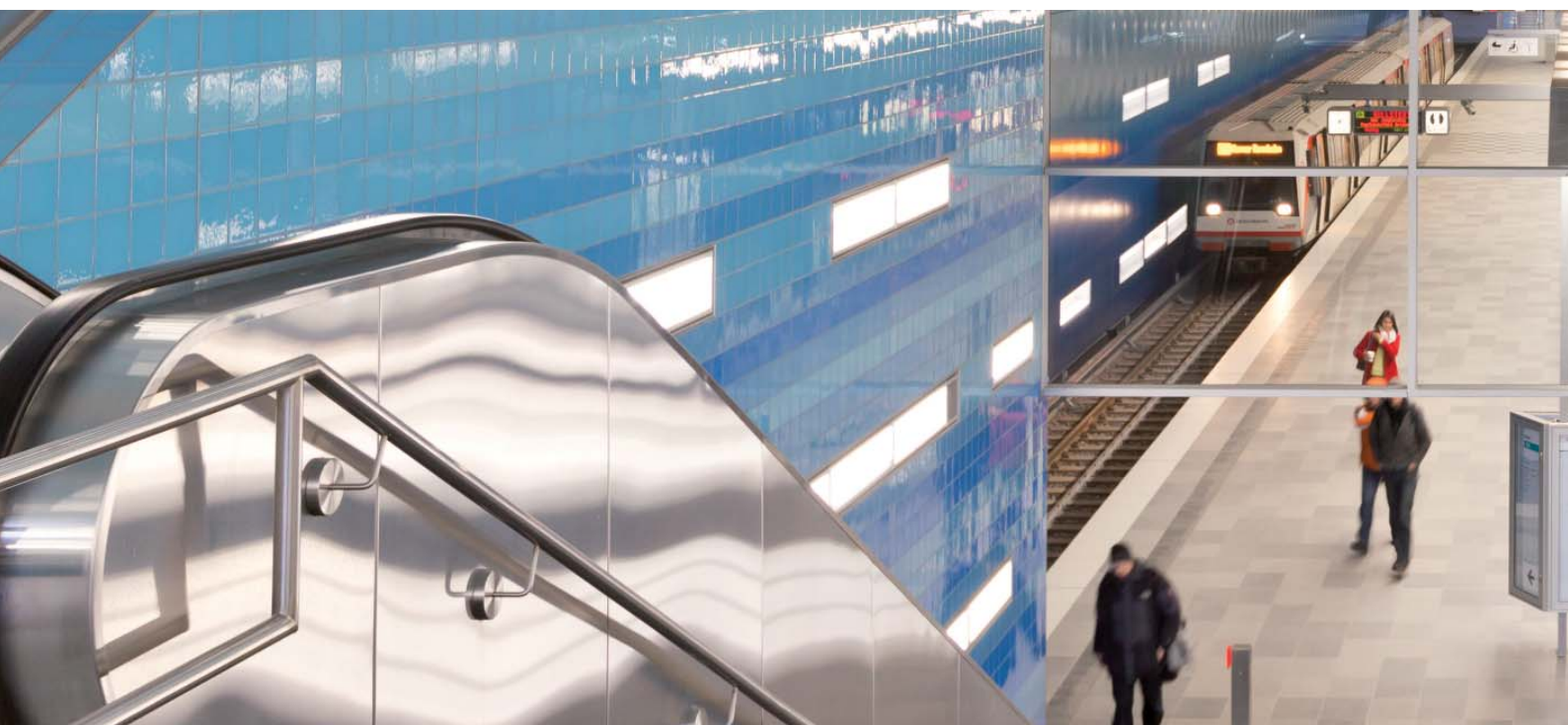
Integrity is a very important aspect in the ACS Group. In 2011, important measures were promoted from the Board of Directors' Executive Committee to advance these values included in the ACS Group's Code of Conduct. Among these were the development of the Ethical Channel and the powers of a Monitoring Committee for the Code of Conduct. The members of this Monitoring Committee were named in 2012 by the ACS Group's Board of Directors. A priority objective for the Group is the complete dissemination of the current ethical rules and proper and efficient management of the ethical incidents which may occur in the company.

5.2. Ethics and Integrity: 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 company or its employees. This commitment is based on the ethical principles governing the ACS Group's operations, which shape its corporate culture.

ACS's General Code of Conduct¹⁵ constitutes a guide for the professional performance of all the Group's employees and managers in relation to their daily work, the resources used and the business environment, as well as for all the investee companies in which the ACS Group has control of management.

¹⁵The ACS Group's Code of Conduct can be seen at http://www.grupoacs.com/index.php/es/c/responsabilidadcorporativ_etica_y_profesionalidad



The basic performance principles of the General Code of Conduct are as follows:

- **Integrity:**

the ACS Group promotes recognition of behaviour in accordance with loyalty and good faith, and against corruption and bribery, among its employees.

- **Professionalism:**

the ACS Group's employees and management should be recognised for their high professionalism based on proactive and efficient performance focused on excellence, quality and willingness to provide service.

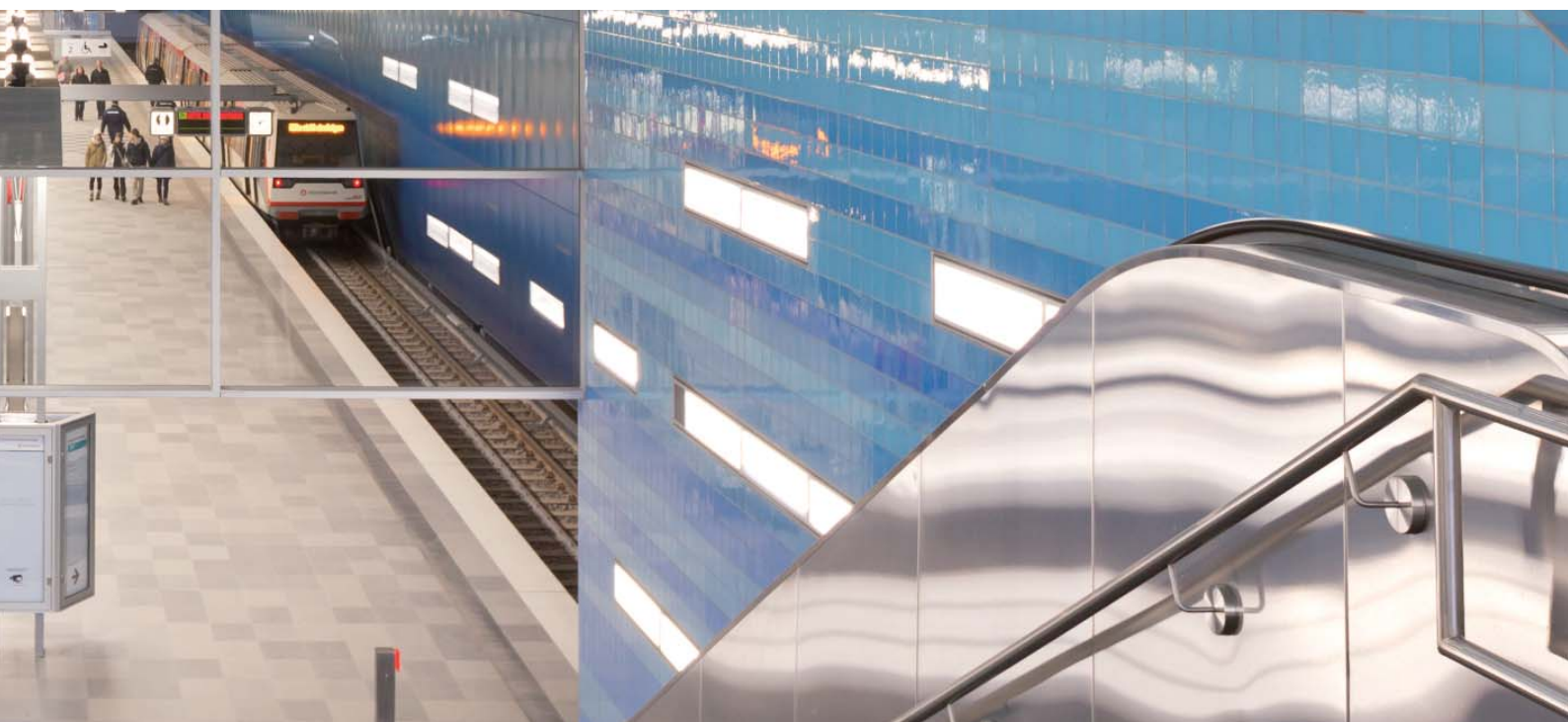
- **Respect for Others and the Environment:**

ACS undertakes the commitment to act at all times in accordance with the United Nations Global Compact, to which it has been a signatory since its foundation, the objective of which is the adoption of universal principles in the areas of human and labour rights and the protection of the environment.

All actions taken by the ACS Group and its employees shall maintain scrupulous respect for the Human Rights and Civil Liberties included in the Universal Declaration of Human Rights. The relationship of the Group with its employees, as well as the relationship among employees, therefore, shall be based on the following commitments:

- Equal opportunities.
- Non-discrimination.
- Promotion of training and professional and personal development.
- Occupational health and safety.
- Eradication of child labour.
- Reduction of negative impacts on local and indigenous communities.

The General Code of Conduct was approved by the ACS Group's Board of Directors in its meeting of 15 March 2007 and modified by agreement of the Board of Directors' Executive Committee of 30 August 2011.



5. ETHICS, INTEGRITY AND TRANSPARENCY IN THE ACS GROUP

5.2.1. Due Diligence in Ethics and Integrity

The ACS Group understands due diligence as the set of activities carried out and aimed at minimising the possibility of bad practices arising in the Group as regards ethics and integrity. The ACS Group understands that the following are necessary for this:

- Analysis of the main risks as regards ethics and integrity.
- Establishing commitments which make clear the behaviour expected of the people who make up the company.
- Allocation of responsibilities as regards supervision of the company's performance in this field.
- The knowledge and understanding by the company's people of what is expected of them in relation to ethics and integrity.
- Supervision and monitoring of practices.
- Establishing procedures which enable the prevention, detection and eradication of bad practices in this field.

The final aim of ACS's actions with regards to ethics and integrity is the establishment of a framework for action which stimulates everyone to execute their responsibilities in an upright, responsible and transparent manner.

The ultimate responsibility for transmitting and overseeing the Group's commitment to integrity falls to its governing bodies, which are charged with driving the development of rules and procedures and the implementation of good practices.

The General Code of Conduct and the procedures laid down for disseminating and safeguarding it are basic elements in the Group's integrity framework. In this respect, the General Code of Conduct has been extended to the whole organisation:

- The Code applies to all members of management bodies and to all employees of Group companies, regardless of the contractual form determining their labour relationship, the post

they occupy or the place in which they carry out their work. They are all obliged to know and comply with the General Code of Conduct and collaborate in its implementation in the Group.

- The scope of application of the Code may be extended contractually to any other individual or legal entity with commercial or business relations with the ACS Group when, due to the nature of that relationship, its activities could affect the ACS Group's image and reputation. Details on these policies have been included in this document in the section on suppliers and clients.
- The scopes of application contained in this Code affect all companies which form a part of the ACS Group due to the latter having control over their management.
- Additionally, the ACS Group's management team shall make the necessary means available to such companies to fulfil the regulations contained in the General Code of Conduct.

5.2.2. The ACS Group's Code of Conduct in Day-to-Day Work

The Code applies to all investee companies in which the ACS Group has control over management.

Although the Hochtief Group became fully consolidated in the ACS Group as of 1 June 2011, both the Hochtief Group's parent company, Hochtief AG, and the parent company of its Leighton subgroup, Leighton Holdings Limited, are companies quoted on the German and Sydney stock exchanges, respectively, hence they are subject to their own regulatory bodies' rules and have both their own Codes of Conduct and their own internal channels for complaints and control, under similar terms to those of the ACS Group. For this reason, the ACS Group's General Code of Conduct does not apply to investee companies belonging to the Hochtief Group and the Leighton Group¹⁶.

¹⁶ For further information:
HOCHTIEF: http://www.hochtief.com/hochtief_en/4300.jhtml
Leighton: http://www.leighton.com.au/_data/assets/pdf_file/0018/3429/Leighton-Group-Code-of-Business-Conduct.pdf

On 5 September 2011, the ACS Group's General Secretary sent a communication to all the heads of the Group's various divisions notifying them both of the creation of a new internal system for denouncing breaches called the Ethical Channel, canaletico@grupoacs.com, and of modifications to the General Code of Conduct approved by the Board of Directors at its meeting on 30 August 2011, by reason of which the new Reworded Text of this General Code of Conduct was sent to the Spanish Stock Market Commission (CNMV). This General Code of Conduct has appeared since that date on the company's website, in both Spanish and English¹⁷.

Since 5 September 2011 and throughout 2012, the Group's various divisions have proceeded to set up the necessary channels and means to enable delivery of the new reworded text of the General Code of Conduct to all ACS Group employees and executives who provide their services in companies which are within their area of responsibility.

In accordance with Article 6 of the General Code of Conduct, the Company's Board of Directors, at the proposal of the Appointments and Remuneration Committee, created the Monitoring Committee for the Code of Conduct, the purpose of which is to ensure compliance and settle incidents or doubts on its interpretation by adopting all the necessary measures for this. In accordance with the aforementioned ACS Group General Code of Conduct, the Monitoring Committee is responsible for the following functions:

- Promoting the dissemination, knowledge of and compliance with the code in each and every Group company.
- Establishing the appropriate communications channels to ensure that any employee can seek or provide information regarding compliance with this code, ensuring the confidentiality of complaints processed at all times.
- Interpreting the regulations derived from the Code and supervising their implementation.
- Ensuring the accuracy and fairness of any proceedings commenced, as well as the rights of persons allegedly involved in possible breaches.

- Defining the cases in which the scope of the Code should be extended to third parties that are to have business or trade relations or with the ACS Group.
- Gathering data on levels of compliance with the Code and disclosing the specific related indicators.
- Preparing an annual report on its actions, making the recommendations it deems appropriate to the Board of Directors through the Audit Committee.

The main tool available to the Monitoring Committee is the Ethical Channel, created in September 2011, enabling notification of irregular conduct in any of the companies making up the ACS Group or any non-compliance with the standards included in the General Code of Conduct, through:

- the e-mail address: canaletico@grupoacs.com
- or the postal address: Canal Ético, Grupo ACS, Avenida Pío XII, 102. 28036 Madrid, Spain.

The Ethical Channel is both a route for denouncing breaches of the rules in the ACS Group's General Code of Conduct and a means for resolving doubts which may be raised on applying the General Code of Conduct.

Based on Opinion 1/2006 issued by the Working Party created by Article 29 of Directive 95/46/EC – on the application of EU data protection rules to internal whistleblowing schemes in the fields of accounting, internal accounting controls, auditing matters, fight against bribery, banking and financial crime – the Spanish Data Protection Agency (AEPD) laid down, by means of Legal Report 0128/2007, the characteristics with which all internal whistleblowing systems must comply in accordance with that set forth in Spanish Organic Law 15/1999, of 13 December, concerning the Protection of Data of a Personal Nature and the regulations which develop it.

¹⁷ http://www.grupoacs.com/index.php/es/c/gobiernocorporativo_codigo_deconducta

5. ETHICS, INTEGRITY AND TRANSPARENCY IN THE ACS GROUP

Following the AEPD guidelines, the Monitoring Committee laid down the regulation for the internal system for denouncing breaches, implemented by the ACS Group through the Ethical Channel:

- Accusations will only be accepted in which the whistle blower is identified, so preventing the existence of anonymous accusations.
- The whistle blowers and accused parties who use the internal whistleblowing system shall be people with a link to the company under employment, civil or commercial law, thus the internal whistleblowing system cannot be made available to third parties, even if they have a legitimate interest.
- Users - potential whistle blowers and accused parties - shall be expressly informed of the existence and operation of an internal whistleblowing system and its existence shall be incorporated in the contractual relationship.
- The accusations shall refer to internal or external matters or standards which involve non-compliance with the employment or contractual duties of the accused party or events which could result in criminal liability for the accused party or the company, based on regulations on money laundering and the reform to the criminal code which establishes criminal liability for legal entities.
- The accusation system will guarantee that the identity of the whistle blower remains confidential throughout all the stages of processing, making it impossible for it to be revealed to the accused party, and the whistle blower must be informed of the following circumstances:
 - His or her identity will be kept confidential throughout all the stages of the process.
 - His or her identity will not be disclosed to third parties, nor the accused person, nor the employee's managers, except if its disclosure to the relevant people involved is necessary in any subsequent investigation or legal proceedings initiated as a result of the investigation carried out by the internal whistleblowing system.
- The internal whistleblowing system must set a maximum period for holding the data related to the accusations, this being limited to that needed for the processing of the necessary internal auditing measures and, as a maximum, to the processing of the legal procedures resulting from the investigation carried out.
- The accused party shall be notified, as soon as possible, of the following circumstances:
 - The body responsible for the whistleblowing system.
 - Of what he or she is accused.
 - The departments and offices which may receive the report within the company.
 - How the accused party can exercise his or her rights of access and correction.

Only in cases where the company's capacity may be put at risk may the duty of informing the accused party be delayed. This delay may not, under any circumstances, exceed three months to be counted from the time that the accusation was made.

- The high level file shall be registered in the General Data Protection Register.
- The high level security measures laid down in Spanish Royal Decree 1720/2007, of 21 December, approving the Regulations developing the Organic Law on Data Protection must be implemented.

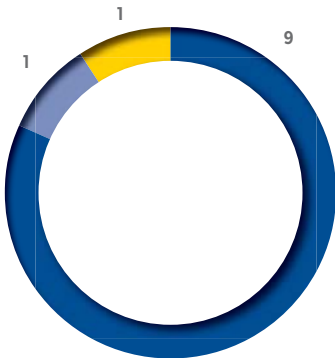
In adherence to all the above, the appropriate registration in the Spanish Data Protection Agency was requested and the latter registered the handling in the General Data Protection Register on 16 February 2012.

In turn, a total of 11 communications were received via the Ethical Channel in 2012, leading to the opening of 10 proceedings. In all except one of the communications, the means used was the digital channel.¹⁸

All but one of the processed accusations corresponded to the Industrial Area. However, the only accusation which led the Committee to initiate an investigation process, which ended with the discovery of irregularities as regards ethics and integrity and the issuing of a report with Recommendations, was in the Construction Area.

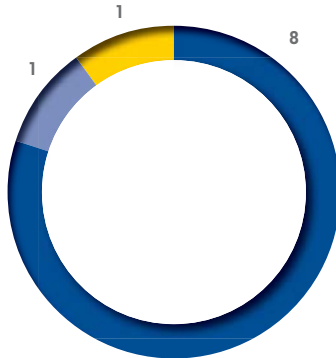
¹⁸ Eleven communications were received, generating 10 proceedings. One of the communications was anonymous and therefore, obeying the criteria set by the Spanish Data Protection Agency, this was not processed.

SOURCE OF COMMUNICATIONS



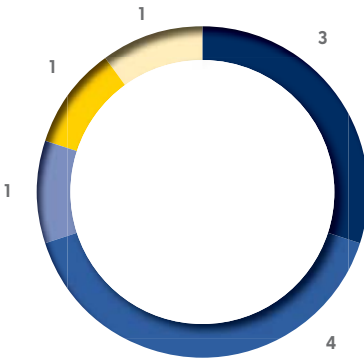
- WORKER
- THIRD PARTY
- ANONYMOUS

COUNTRY OF ORIGIN



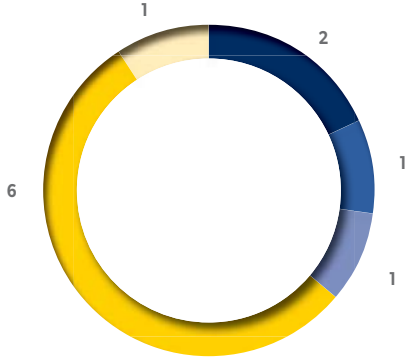
- SPAIN
- MÉXICO
- ARGENTINA

REASON FOR COMMUNICATION



- LABOUR DISPUTE
- DISCRIMINATION
- REQUEST OF INFORMATION
- HARASSMENT
- IRREGULARITIES IN MANAGEMENT

METHOD OF RESOLUTION



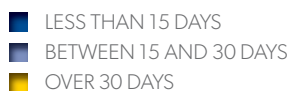
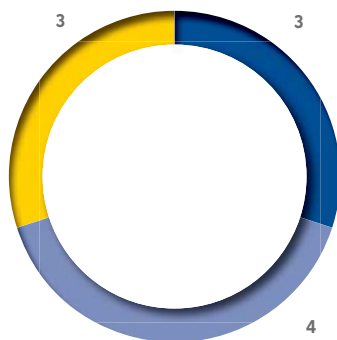
- REFERRED COMPETENT JURISDICTION
- SUB JUDICE
- REPORTED
- INADMISSIBLE
- RECOMMENDATION TO THE PARENT COM

5. ETHICS, INTEGRITY AND TRANSPARENCY IN THE ACS GROUP

Worthy of note among the communications received is one that occurred with the purpose of denouncing irregularities in management by the Group's executives. This accusation was considered relevant and led to a procedure investigating the facts that ended with a report with conclusions and recommendations which was submitted to the management of the corresponding area of business's parent company.

The average period for resolving the communications was 45.4 days, although this average was strongly affected by one of the communications, which required a much longer period for resolution than the average. The communications were resolved according to the following distribution:

PROCESSING PERIOD



The Monitoring Committee for the Code of Conduct indicated, in the conclusions to its annual report presented to ACS, Actividades de Construcción y Servicios S.A.'s Board of Directors, that the Group's companies had made noteworthy efforts in 2012 to disseminate the tools as regards ethics and integrity and in complying with the rules of the General Code of Conduct.

The above is shown both in the activity of the Ethical Channel and the high level of compliance, at Group level, with a series of fundamental obligations, noteworthy among which are:

- Disseminating among its employees what is expected of them as regards ethics and integrity and in supervising and monitoring compliance with the practices laid down as regards ethics and integrity.
- Prevention, detection and eradication of bad practices.
- Spreading among its employees and executives of the prohibition of bribes to public authorities and officials and the prohibition of its employees giving to third parties or receiving from third parties undue payments of any type.
- Promotion among the employees of the duty to make responsible, efficient and appropriate use of company resources, in accordance with the environment corresponding to their professional activities.
- Training of Group employees who participate in the selection processes for suppliers, subcontractors and external collaborators so that they act impartially, transparently and objectively, applying quality and price criteria to obtain the most appropriate offer for the ACS Group.
- Heeding of the UN Global Compact as regards the adoption of universal principles in the fields of human and labour rights and the protection of the environment. As indicated later in this report, companies representing 81.3% of

5.3. Commitment to Information Transparency

ACS Group sales formally apply these good practices.

- The promotion of professional and personal development for all employees, so ensuring both equality of opportunity and the setting of objective criteria of merit and capability in selecting and promoting Group employees and in eradicating discrimination or any other behaviour which involves personal harassment.
- Fulfilment of the obligation to eradicate child labour and complying with the provisions set forth by the International Labour Organisation (ILO) with respect to under age workers.
- Compliance with regulations as regards donations, sponsorship and patronage through the ACS Foundation.

Over the next few financial years and as continuous improvement in order to continue to fulfil the obligations deriving from the General Code of Conduct, the following initiatives will be carried out:

- Continuous identification of risks as regards ethics and integrity and allocation of responsibilities for supervision.
- Dissemination of the duty to permanent confidentiality with respect to any information they know of in the course of their work, which if disclosed or publicised, could affect the Group's interests.
- Adoption of measures so that the company's actions are socially responsible, with special emphasis on respect for cultural diversity and the principles and customs of the communities where it carries out its activities.

An essential requirement for the ACS Group to be able to fulfil its mission of generating 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 the company's other stakeholders are respected. The ACS Group is committed to total rigour in the information transmitted, especially with respect to the media.

5.3.1. The Value of Information Transparency

This general objective of transparency is stated by means of the following 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 so that the Group's different stakeholders recognise it as being sound and well-managed in Spain and abroad.
- Contributing to the make-up of a positive corporate image which aids in the achievement of business objectives and in commercial activity.
- Maintaining a fluent relationship with external agents, particularly with representatives of the media.
- All of the above leads to an increase in the value of the ACS brand and of its different companies and businesses.

The ACS Group manages its commitment to transparency towards its stakeholders by three main means:

- The ACS Group's Communications Department.
- The ACS Group Website.
- Shareholder and investor information activities.

5. ETHICS, INTEGRITY AND TRANSPARENCY IN THE ACS GROUP

The ACS Group's relationship with all forms of media is fluently and transparently led by the **Group's Communications Department** and involves interviews, press releases and contact on the corporate website, as well as meetings with journalists.

Numerous communications took place with journalists in 2012: 8 press releases were published, several press conferences were held and many individual interviews were given by the Chairman and Corporate General Manager.

The website, www.grupoacs.com, is a commitment from the Group to clarity, accessibility and information. Its objectives are specified below:

- To open a "window" to society through which the company may be analysed with greater transparency and ease.

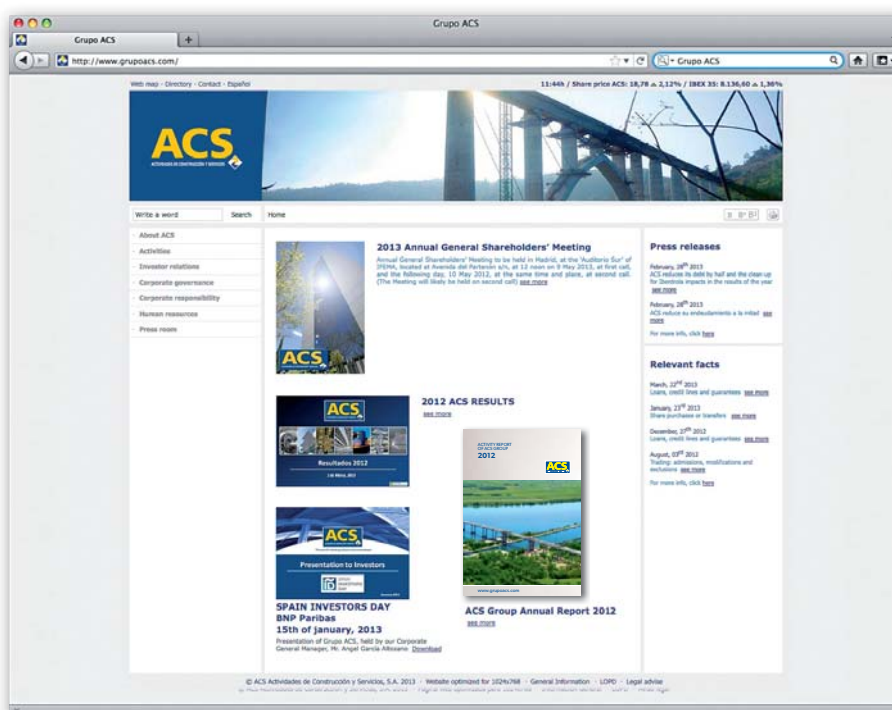
- To maintain a permanently open communication channel both with the Group's priority stakeholders and with any individual or company needing any type of information on the Group.

- To offer, completely transparently, the company's economic and financial information, information on its systems of governance and management and the activities it undertakes.

- To enable searches for historical information on the company for more in-depth analysis of trends and performance.

- To maintain up-to-date information on the performance of the company and the criteria behind its management at all times.

| www.grupoacs.com | 2009 | 2010 | 2011 | 2012 | 2012 daily average | Change 11/12 |
|------------------|-----------|------------|------------|------------|--------------------|--------------|
| Website visits | 890,441 | 1,028,874 | 1,131,448 | 1,141,147 | 3,126 | +0.86% |
| Pages viewed | 8,677,863 | 10,598,226 | 14,583,027 | 13,607,471 | 37,281 | -6.69% |



Similarly, to aid in their commercial and informational activity, the ACS Group's lead companies and large subsidiaries own and promote a large number of complementary websites and information portals, intranets, on-line tools and remote reporting and training systems.

On the other hand, the shareholders' right to information is detailed in several rules in the regulations of the Shareholders' Meeting. Hence, in order for the Company Shareholders' Meeting to properly serve the function for which it was designed, prior to each Shareholders' Meeting, the Board of Directors makes all the information which is legally required to be provided to shareholders available to them all, in addition to information that is not legally required to be provided, but that reasonably should 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 various channels to fulfil this commitment to communication and transparency. Its objective is to promote flexibility, fairness and immediacy and to achieve greater reach with the published information by means of:

1. The Group's website.
2. The shareholder service office (+34 91 343 9200).
3. The shareholder information e-mail address (irgrupoacs@grupoacs.com).
4. The shareholder service web forum.
5. Fluid communication with the Spanish Stock Market Commission (CNMV).
6. The information offered by the Investor Relations Department.

Furthermore, a Shareholder Service Web Forum has been operating since October 2010 to attend to requests for information resulting from the General Shareholders' Meetings. This tool acts as a support in each period leading up to the General Shareholders' Meeting and will be available to all the Group's shareholders.

In addition, the Spanish Stock Market Commission (CNMV) is the main means through which the ACS Group communicates and announces its development and its main actions. Forty-two "Relevant Facts" were communicated through the Commission during 2012.

The ACS Group publishes standardised financial information and information on the development of its businesses annually and quarterly. Similarly, the company attends to requests for information from other market agents through meetings. These meetings are intended to complement the Group's reporting efforts and the objective thereof is to clarify information already published in accordance with investors' and shareholders' needs.

During 2012, the Group gave 4 corporate presentations, held 1 General Shareholders' Meeting, attended 7 seminars and events in specialised forums in Europe and the US and organised 116 planned meetings with institutional investors.

The measures aimed at promoting information transparency affect the Company's reputation and the dissemination of its corporate values, its technical capacities and its business successes.

| Activity with institutional investors | 2008 | 2009 | 2010 | 2011 | 2012 |
|---------------------------------------|------|------|------|------|------|
| Investors attended | 174 | 180 | 167 | 191 | 116 |
| Events | 7 | 10 | 8 | 9 | 7 |

6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

6.1. R&D+i in the ACS Group

2012 Milestones

DRAGADOS

Dragados leadership in the ECTP's reFINE initiative (research for Future Infrastructure Networks in Europe) to promote European R&D in transport infrastructures. Inclusion of reFINE in the Joint Task Force promoted by the EC to prepare the road map in this field together with the ERRAC, ERTRAC, ACARE and Waterborne technological platforms. Increase in the portfolio of R&D projects, especially in the civil works area. Participation in FP7.



Carrying out of various projects in the energy and transport fields:

- new thermal storage systems,
- equipment optimisation,
- new heat collection fluids,
- new hybrid BioSolar systems,
- improvements in direct current electricity transmission systems,
- development of electric vehicle charging infrastructure; and
- development of means of magnetic levitation transport.



Bolstering the initiatives to identify innovation activities in projects.

Turner

Setting up of an R&D+i management system.



Implementation of the R&D+i platform and the knowledge management tool in Urbaser. Increased investments in R&D+i activities. Excellence in research in the "Alfonso Maíllo" Waste Technology Centre, enabling the position of leadership in the environmental sector to be maintained. Implementation of energy saving and efficiency measures in several group facilities.



Creation of the post of Innovation Coordinator to boost the application of innovative solutions to production problems. Organisation of an International Workshop, in collaboration with CEDEX and Delft University, on the SKIDSAFE R&D project.



Development of working systems and methods for improved work quality, as well as effectiveness and efficiency. Nearly 3,000 hours were invested in this work in 2012 at a cost of over €73,000, representing 0.9% of profit after tax.



Carrying out of several significant projects, outstanding among which are:

- EfISAE: Equipment for optimising energy consumption and reduction of emissions from public transport buses.
- MOLECULES: Development of services which promote the use of electric vehicles in cities.
- SIRCI: Implementation of the Integrated Fare Collection, Control and Information System for public transport in the city of Bogotá.
- PRECYSE: Protection of critical infrastructure management systems - e.g. those related to mobility, power, etc. - against cyber attacks.

Challenges for 2013

DRAGADOS

Internationalisation of R&D+i with the launch of R&D+i projects in growing countries, maintenance of the portfolio of European FP7 projects and consolidation of reFINE projects in the JTF road map on transport infrastructures and inclusion in Horizon 2020 work programmes for 2014.



To complete the implementation of the R&D+i Management system being developed in accordance with the UNE 166000:2006 standard. Obtaining finance for the 5 European projects proposed to the European Commission and continuing with the lines of development and innovation in renewable energies, HVDC, electric vehicles and transport systems.



Reinforcing and executing projects for offshore and onshore wind power.

VIAS

Continue with the internationalisation of VIAS' R&D+i by participating in at least one international project apart from OPTIRAIL.

Turner

Development of communications policies to reinforce the perceived importance of R&D+i among employees. Development of a system for identifying viable projects and what the scale of their impact may be if carried out.

DRAGADOS POLAND

Support to Dragados España and Polaqua in the IBDIM and FEHRL (Forum of European National Highway Research Laboratories) programmes started in 2012.



Carrying out of R&D+i projects in order to increase company know-how and hence entry to other markets (particularly the renewable energy market).



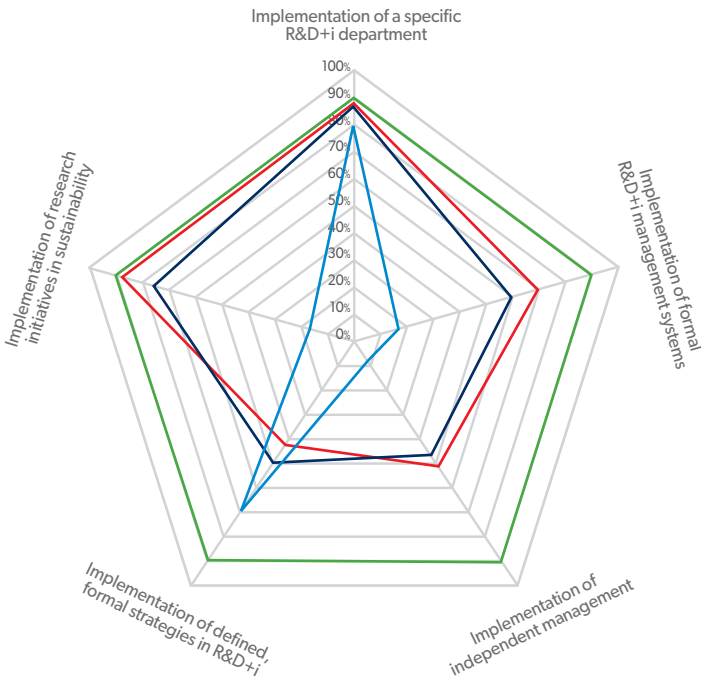
Obtaining of support funds to boost the line of research related to the Cloud Computing paradigm, Smart Cities, LTE (4G) over SICE Tecnología y Sistemas' business lines (automatic water information - SAIH - and water quality - SAICA - systems, ITS systems for urban, inter-urban, railway and inter-modal traffic).

6.1.1. Strategic Priorities

The ACS Group is an organisation which is continually evolving, adapting to the needs of its clients and demands from society. The diversification process through which the ACS Group is passing during these years has led it to undertake a wide range of activities which approach innovation and development differently, but resolutely. Through this commitment to technological development, the ACS Group responds to the growing demand for improvements in processes, technological progress and quality of service from its clients and from society.

Its involvement in research, development and innovation are clear in its increased investment and the R&D+i efforts the ACS Group makes year after year. This effort leads to tangible improvements in productivity, quality, client satisfaction, occupational safety, the obtaining of new and better materials and products and the design of more efficient production processes and systems, among others.

THE ADOPTION OF THE MAIN R&D+i PARAMETERS IN THE ACS GROUP IS SUMMARISED IN THE FOLLOWING GRAPH¹⁹



- ACS GROUP
- CONSTRUCTION
- INDUSTRIAL SERVICES
- ENVIRONMENT

Level of implementation as reported by ACS Group companies and according to the level of sales of each of them.

¹⁹ The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2012.

6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

The ACS Group's largest companies have governing bodies for technology, which are usually the Technological Development Committee, which leads the development of research activities in each company. The existence of this governing body or committee was reported by companies representing 87.0% of ACS Group sales in 2012.

R&D management takes place through a system which, in the largest companies and in general, follows the guidelines in the UNE 166002:2006 standard and is audited by independent specialists. There is a formal management system in companies representing 60.4% of Group sales. Furthermore, independent audits are carried out in companies representing 46.8% of sales.

This management system serves the general research strategy of each of the companies

which, whatever their specific features, share the following lines of action:

- Development of strategic lines of research individualised by company.
- Strategic collaboration with external organisations.
- Growing and responsible investment in order to promote research and generate patents and operational techniques constantly and efficiently.

There is a defined and formal strategy for R&D+i in companies representing 49.6% of ACS Group sales.

Each Group company's strategic decisions on the execution of R&D projects seek to maximise the positive impact of ACS's technical and



technological progress. The companies have analysis and discrimination procedures to decide which projects to undertake

In December 2012, the ACS Group had 337 projects in progress and had registered 12 patents in the year.

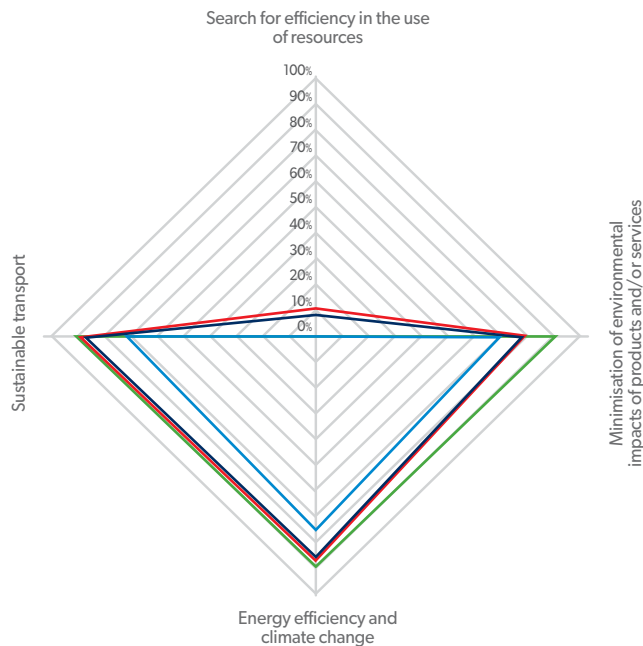
Furthermore, collaboration with external organisations is crucial for the success of the projects tackled. Hence, during 2012, ACS Group companies collaborated with 158 research and technological centres and with 151 universities, as well as with 145 other diverse centres, institutes or institutions related to R&D+i. These prestigious research institutions, both domestic and international, complement the ACS Group's own research capabilities.

The ACS Group invested a total of €49.04 million in research, development and innovation in 2012, which represents a reduction of around 12.3% relative to 2011. In 2012, the Group received €7.00 million in subsidies for R&D+i, 8.5% more than in 2010.

The ACS Group's activities as regards R&D+i also represent substantial support to the promotion of sustainability. The large number of projects which have the aim of increasing efficiency in the use of resources, minimising the impact of the services provided to clients and carrying out eco-design activities is noteworthy. At least one of these activities is carried out in companies representing 76.0% of ACS Group sales.



MAIN AREAS FOR DEVELOPMENT OF RESEARCH IN SUSTAINABILITY



- ACS GROUP
- CONSTRUCTION
- INDUSTRIAL SERVICES
- ENVIRONMENT

Level of implementation as reported by ACS Group companies and according to the level of sales of each of them.

6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

6.2. Construction

The majority of the ACS Group's Construction companies²⁰ have a system for management of research, development and innovation, specifically eight of them, representing 68.9% of ACS Group sales in this area. Generally, these management systems are implemented around the UNE 166002:2006 standard.

Although decentralised, management is coordinated by Dragados' departments and, on the other hand, independently in HOCHTIEF's companies. To meet the objectives set by their respective lead companies, the ACS Group's construction companies had 205 projects in progress at the end of 2012, managed by the various R&D+i governing bodies. ACS's Construction companies invested €24.95 million in R&D+i during the financial year, nearly 22.9% less than that spent in 2011.

²⁰The data referring to the ACS Group's Construction companies included in this section were calculated by analysing the information supplied by the different companies in this area of activity, weighted by level of turnover. The data is expressed in terms of percentage of total Construction area sales.

In their R&D+i activities, the ACS Group's construction companies collaborated with a total of 302 research institutions, including 98 research and technological centres, 96 universities and another 108 institutions promoting innovation or research of differing natures.



THE OBJECTIVE OF THE LINEO PROJECT IS TO ASSESS AND DEVELOP A FULLY FUNCTIONING SYSTEM FOR LOCATING PERSONNEL IN REAL TIME IN UNCONTROLLED SETTINGS, SUCH AS CONSTRUCTION ENVIRONMENTS

LINEO PROJECT

(Locating System based on Interactive Technologies for application in Construction Environments)



One of DRAGADOS' objectives in carrying out its activities is the continuing reduction of workplace accident rates in its works. After analysing accident rate case studies, the decision was taken to tackle a specific type of accident which has particularly serious consequences due to its nature. This type is collisions and operators being knocked down by heavy machinery.

The LINEO (Locating System based on Interactive Technologies for application in Construction Environments) R&D project, which is currently in progress, originated with the aim of reducing these types of accidents by developing a location system that provides knowledge, in real time, at certain times and in certain works areas, of the exact position of both the operators and the possible objects in the environment that are critical to their safety.

Of the various technological solutions analysed, taking the characteristics of the works environments into account, priority is being given to developing a centralised location system in which the objects identified as critical, in this case machines, are equipped with a series of detection devices which enable the detection and location of anything that moves around them (operators, machines, etc.), without the need for the latter to carry a specific device (passive subject model). There is no technological solution currently available that can resolve this particular problem in a works environment.

In spite of the difficulties the environment where it will be used presents, very ambitious operating requirements have been set to ensure the system's robustness (high percentage of corrective measures in any situation) and reliability (minimisation of false positives and negatives). As such, the target set is for the system to offer measurements in real time (updating times of less than one second) and high precision (around 1 metre).

The LINEO project is divided into three main areas of work:

- The construction of a series of standalone modules which include sensors of different types and technologies with the capability to detect and locate moving objects and to transmit this information in real time.
- The development of a response protocol based on processing and learning which enables continuous improvement in differentiating sensitive information from what is not.
- The design and construction of a unobtrusive driver warning device meeting ergonomic, usability and self-installation criteria, which shows the information clearly and efficiently and offers various options for interacting with it.

Finally, the three developments will be integrated into a single system to be packaged for use in the works environment.

To carry out this project, which is due to be complete in December 2013, a consortium was formed made up of DRAGADOS (project leader), SICE as the technological industrial partner and the ARTEC Group from the University of Valencia and the Polytechnic University of Madrid's Higher Technical School of Telecommunications Engineering as hardware and software developer partners.

The LINEO project, approved under the INNFACTO 2011 call, is co-financed by the Spanish Ministry of Economy and Competitiveness within the National Scientific Research and Technological Development and Innovation Plan 2008-11.



6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

SICURA PROJECT



The SICURA Project is co-financed by the Spanish Ministry of Industry, Tourism and Trade and led by DRAGADOS with the collaboration of the University of Valencia. The objective of SICURA is to apply Augmented Reality (AR) to construction activities. Among the numerous possibilities this technology offers, the two applications developed within the project focus on offering the company's technical team support in two specific processes: monitoring and control of works execution and maintenance of the machinery operating in it.

From a general perspective, AR enables real information (e.g. images captured by a camera) to be merged with computer-generated information to offer additional information to the user in text, audio or image format. The devices that can be used to take advantage of this technology range from a smartphone, PDA or Tablet (for use on site) to a conventional PC (desktop application for remote use).

APPLICATION OF AUGMENTED REALITY TO ASSIST IN CONTROLLING WORKS EXECUTION

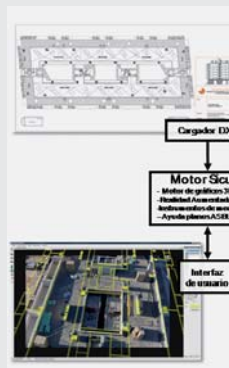
The first software application developed in the SICURA project offers support to the works technical team in tasks such as checking setting out or execution, rebar placement, assistance on generating As Built drawings, making measurements, etc.

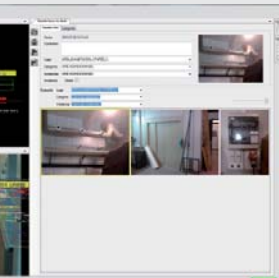
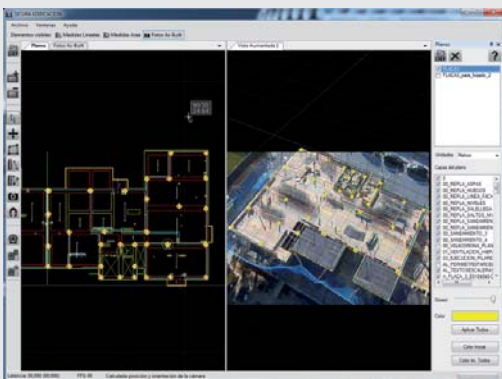
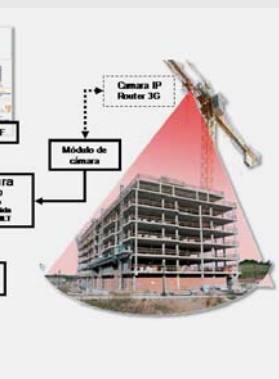
The application uses superimposition of works drawings (architecture, structure, installations, etc.) onto an image of the works in question, creating what is known as an Augmented Image or View. This augmented view enables immediate visual checking of the differences between what was planned and what has been executed or is expected to be executed. Superimposition is possible through a simple process of calibration of the drawing and image so that the software adapts the arrangement of the drawing to fit the real works image.

Some aspects of the software features are detailed below:

- **Operation with drawings:** the application enables various drawings to be loaded, the changing of units of measurement, movement of drawings and the modification of drawing layers (activation, deactivation, change of line colours and thicknesses, etc.).
- **Image capture modes:** to configure different augmented views, the image sources can be still images (loading the image from a file on the PC), from a webcam (real time images obtained from a webcam or cameras built into laptops, tablets or UMPCs) or from an IP camera (real time images from an IP camera using the MJPEG format). Currently, the IP camera enables changes to orientation and zoom in real time with precision of a few centimetres.
- **Calibration:** is a necessary process to find the correct relationship between drawings and images.
- **Measurement:** several tools have been implemented to make linear and area measurements both on the 2D plans and on the augmented view.

The application also allows photographs of the works from any device (camera, smartphone, etc.) to be stored and indexed automatically to their position on the drawings (once these places have been defined). Comments, such as incidents related to what has been photographed, actions to be carried out, etc. can also be linked to the photographs. Photographs with outstanding incidents appear marked with a red bar for ease of identification. The application also permits a historical progression of photos taken of a certain place in the works or a given incident to be viewed.





6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

CUTTING-EDGE DEEP-SEA ENERGY STORAGE FACILITIES



DEVELOPING INNOVATIONS, SETTING TECHNOLOGICAL BENCHMARKS, QUESTIONING AS WELL AS OPTIMIZING AVAILABLE TECHNOLOGIES AND PROCESSES. THESE ARE THE EXCITING CHALLENGES IN RESEARCH AND DEVELOPMENT OF HOCHTIEF

HOCHTIEF'S INNOVATION MANAGERS ARE CURRENTLY WORKING WITH PARTNERS ON A CUTTING-EDGE CONCEPT FOR DEEP-SEA ENERGY STORAGE FACILITIES BASED ON HOLLOW SPHERES

Energy from renewable sources like wind turbines and photovoltaic systems is not permanently available. When it comes to fluctuating energy sources like these, storage technologies play a key role. Efficient storage of large amounts of energy is of vital strategic importance for future energy supply. Worldwide storage capacity for renewable energies is projected to treble by 2030.

That's why HOCHTIEF is working with the Fraunhofer Institute for Wind Energy and Energy System Technology and other partners to develop a new concept for storing energy.* The development and research project "STENSEA" (Stored Energy in the Sea) is investigating the installation of large storage facilities on the sea floor, in combination with offshore wind farms.

The physical principle on which the energy storage facility operates is similar to that of conventional pumped storage power plants, but based not on two reservoirs, but a hollow sphere. When electricity is needed, the sphere is opened. The inflowing water drives a turbine to generate electricity. When there is a surplus of electricity in the grid, part or all of the water is pumped out of the sphere. The energy is stored and only re-released when water streams in again during the next filling cycle.

The STENSEA pumped storage facility can be used worldwide in suitable waters and water depths. The energy potential depends on the depth of the water and the size of the sphere. For example, a sphere with a diameter of roughly 30 meters and a capacity of 12,000 cubic meters located in 700-meter deep water will store 20 megawatt hours of energy. The capacity calculations are based on a charge/discharge efficiency of 85%. The construction of deep-sea storage facilities is subject to fewer geographical restrictions than pumped storage power plants on land. The new concept could therefore provide relatively large additional storage capacities with little environmental impact and without the need for massive further grid expansion.

The new technology for storing energy on the ocean floor would supplement HOCHTIEF's capabilities in offshore energy production. In addition, HOCHTIEF could handle the construction, logistics, and operation of the hollow spheres.



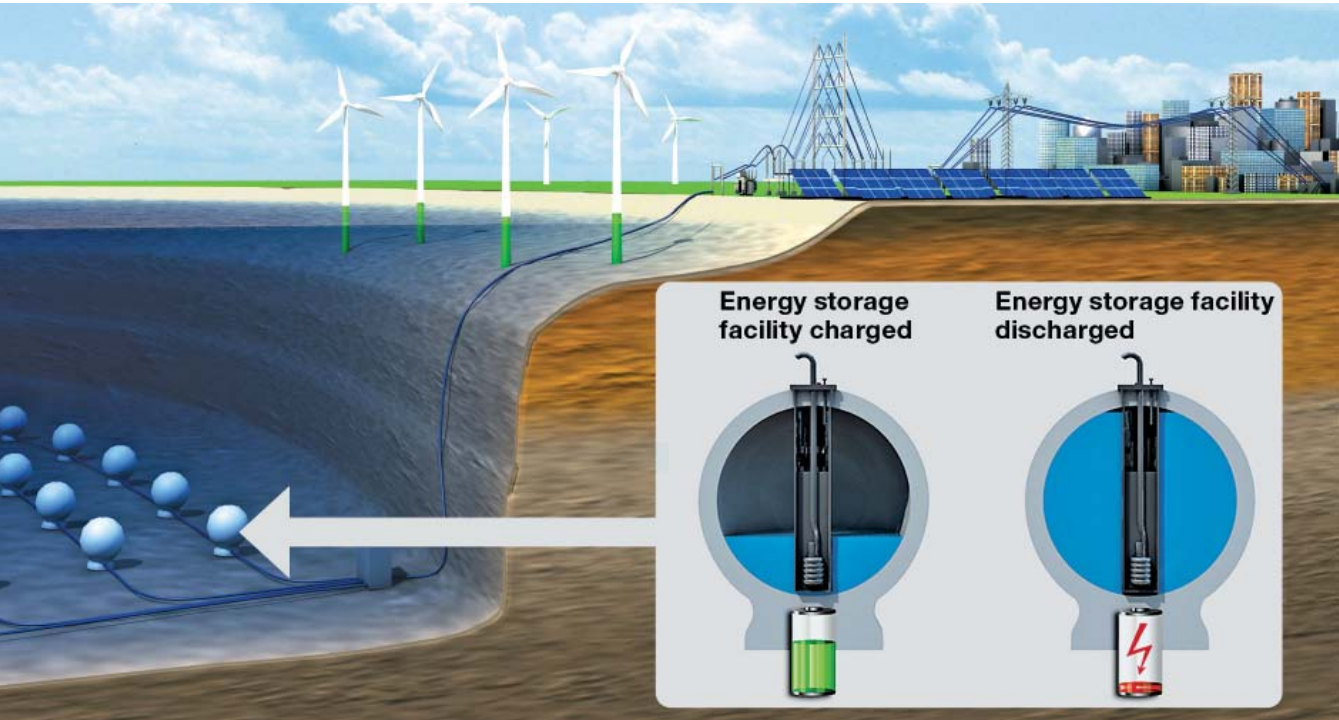
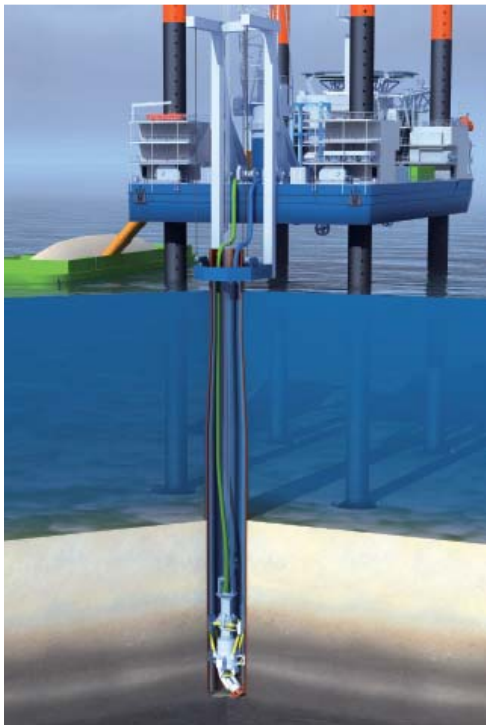
INNOVATIVE FOUNDATION DRILLING METHOD



Offshore wind power projects call for the use of highly specialized techniques to seat the supporting piles for turbines in the sea floor. Not least among the challenges is the need to significantly reduce noise from foundation work to protect fauna and flora. Marine mammals particularly are affected by the noise produced.

HOCHTIEF's answer, developed together with a partner, is the offshore foundation drilling (OFD®) technique. Instead of ramming, this approach for erecting offshore wind farms uses quieter vertical drilling to insert piles into the sea floor. In addition, OFD can be used in almost any underground location and enables piles with a larger diameter than previously to be erected.

HOCHTIEF has also joined with partners in developing a mortar that will further simplify the installation of piles. We plan to carry out final tests on the procedure in the fourth quarter of 2013 and to offer it to customers, who have already shown strong interest, in 2014.



6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

6.3. Environment

In the ACS Group's Environment business²¹, innovation constitutes a basic principle both in management and in processes for recovery, reuse and reclamation of wastes. To carry out this task, Urbaser has its own specific R&D+i department with a formal management system certified under the UNE 166002:2006 standard and audited by an independent third party.

A Strategic Plan for R&D+i is determined annually or biannually, setting the priority lines in R&D+i for the company and framing the projects to be carried out. At 31 December 2012 there were 26 research and development

projects in progress, in which €8.07 million were invested, 43.6% more than in 2011.

As a significant part of its activity, Urbaser's R&D+i area collaborated with a total of 64 research institutions, including 14 research and technological centres, 13 universities and another 37 institutions promoting innovation or research of other types.

²¹ The data referring to Environment included in this section were calculated by analysing the information provided by Urbaser.



AUTOMATING RECOVERY OF GLASS CONTAINED IN THE MSW REJECT FRACTION (VRESTO) – ECOPARC, BARCELONA – URBASER



At Barcelona's Ecoparc facility, the average percentage of glass contained in the reject, "RESTO", fraction is approximately 5%. This led us to raise the question of how to recover not only this material to give it value, but also likewise to increase the percentage of recoverable materials.

The glass fraction, as well as making various production processes more complex and difficult, causes wear in belts and machines, with resulting losses in productivity and additional costs.

Thanks to the application of innovative concepts, significant improvements – for which patentability is being assessed – have been introduced to the process, resulting in increased efficiency and effectiveness in recovering reclaimable materials and giving better quality compost.

1. Project objectives

The project objective lies in the recovery from the reject fraction firstly of metallic materials (aluminium and iron) and then glass in a second step. Specifically,

- Recovering glass contained in the "RESTO" fraction.
- Improving compost quality by minimising the flow of contaminants to composting.
- Recovering more reclaimable materials (ferrous metals and aluminium).
- Recovering a good quality Solid Recovered Fuel (SRF).

2. Description

The project focuses on the "RESTO" or reject fraction from the grey municipal solid waste collection container. In general, the amount of so-called "contaminants" in this fraction is high and a mixture of plastic, paper, cardboard, glass, metal, organic material, etc. fractions are generated in the end.

Given the ECOPARC plant's unusual configuration, significant synergies have been created between the various waste pre-treatment stages which make it possible to bring this innovative project to fruition.

Firstly, a biological pre-fermentation of the "RESTO" fraction takes place. The result of

this is a fine, sandy material, due mainly to the reduction in size of the organic material and paper by biological break down and the glass content by means of erosion in the equipment.

The fact that the glass is broken up by the mechanical tumbling action (not grinding) into fractions of a smaller size makes the design of a new automatic recovery process for it possible and lays the foundations for the recovery of a good quality SRF, i.e. all the necessary conditions come together in this type of plant to promote the development of an innovative activity.

Once the pre-fermentation is complete, the objective is to recover the fine fraction containing the majority of the glass for recycling. However, for proper glass recovery and to increase process efficiency, the material needs to be conditioned by extracting the metals and the light materials from it.

As such, the process is set out in two stages: the first stage for the recovery of ferrous and non-ferrous metals and the second where the glass is recovered, a good quality SRF prepared and the organic fraction prepared for composting.

It is important to emphasize that the re-engineering was carried out with the plant operating and without causing alterations to the facility's normal production.

The critical points in the process are defined by the nature of the material (very heterogeneous), proper separation of the fractions to optimise reclaimable material recovery and the moisture in the flow.

3. Results

After implementation of the first stage, aluminium recovery has been doubled and ferrous metal recovery increased.

With the second phase, the objectives set are being optimised to achieve the following recovery amounts:

- Glass: 4,700 tonnes/year.
- High quality SRF: 7,500 tonnes/year.
- Potential SRF: 2,500 tonnes/year.

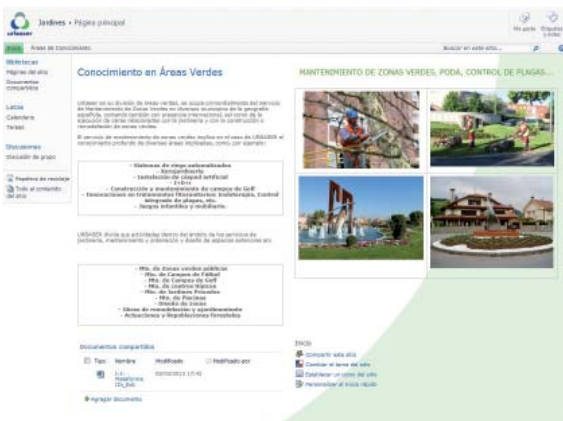


6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

RDI PLATFORM

Monitoring of R&D projects is currently being carried out through the RDi platform, developed in house using the SharePoint 2010 environment and consisting of a shared working environment through which all the R&D+i projects are managed, involving both the R&D+i coordinators and the projects' technical heads.

This is a powerful document manager with calendar and task allocation (which can be synchronised with Outlook) and timetable, as well as discussion forums inherent in each project.



Knowledge Management

With the fundamental aim of transforming implicit knowledge in the organisation into explicit knowledge, the knowledge management platform is set out as follows:

- Establishing a "Panel of experts" who can be identified by areas of knowledge from among the organisation's experts, available to the whole company.
- Creating "Knowledge communities" consisting of private areas for experts and expert FORUMS. The basic aim is to tackle operational problems and find solutions.
- Creating a "Library", which will be a public part, open to the whole company.
- Creating a space for events, through which you can find out about the timetable of the most significant events in which you wish to take part.
- Creating a space dedicated to Technological Vigilance, containing the regular technological vigilance bulletins.
- Creating spaces where workers join in.

Basically, this is a powerful document management system which makes the information in it available to the organisation. It is completed by discussion tools which enable the structuring of the most suitable environment for experts to be able to tackle day-to-day operational problems, eliminating company relocation difficulties.

In parallel, and always as part of knowledge management, an INNOMARKET will be created, presenting the results of the R&D+i projects currently being developed and in turn enabling them to contact different stakeholders.

6.4. Industrial Services

The ACS Group's Industrial Services area²² carries out significant work in promoting research, development and innovation through the various R&D+i departments in several of the companies in this line of business. Companies representing 78.9% of Industrial Services' sales reported the existence of an R&D+i department or management in their structure.

Total investment of €16.02 million was allocated to the execution of the more than 106 projects managed by the different departments, 10.7% less than in 2011. These projects are carried out by virtue of a formal research and development management system, which is implemented in companies representing 15.7% of Industrial Services' sales.

The R&D+i areas in the various companies collaborated with a total of 88 research institutions, of which 46 were research and technology centres and 42 universities.

The R&D+i strategy of many of the companies in this area is based on an external focus, aimed at its stakeholders, and an internal focus, aimed at process modernisation and improvement.

²² The data referring to the ACS Group's Industrial Services companies included in this section were calculated by analysing the information supplied by the different companies in this area of activity, weighted by level of turnover. The data are expressed in terms of percentage of total Industrial Services area sales.



6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

TONOPAH



The Crescent Dunes project at Tonopah, Nevada is a clear example of technological innovation with a commercial purpose. ACS's industrial arm, the COBRA group, set out on an adventure innovating in the thermal solar power field around 2008 when it commissioned the first parabolic trough power plant in the world with storage. Since that time, the group has carried out a number of projects at the leading edge of technology, making us leaders in the sector. In 2011, as the leader of the construction joint venture, the group helped develop Gemasolar, the first tower thermal solar power plant with storage, a small scale (less than 20 MWe) commercial demonstration project. Thanks to the know-how developed on that project, the industrial group considered itself qualified to tackle the Tonopah project, which will be the world's largest tower solar plant.

This project has the support of the US Department of Energy and consists of a 200-m high central concrete tower with a receiver at the top. Over 10,000 flat mirrors, each of 120 m², are being installed in a circle around the tower. These will reflect and concentrate the sunlight onto the receiver at the top of the tower. Molten salt flows through the receiver and this is heated by the solar radiation concentrated on it. This heat is then used to produce steam and generate electricity. The plant also has 10 hours of thermal storage to be able to produce electricity after the sun goes down.

The plant has a 125 MWe steam turbine which will generate 500 GWe per year; enough power to supply 75,000 homes and avoid the emission of 350,000 tonnes of CO₂ per year. There will be peaks of up to 800 workers during construction and the project will generate around 4,300 jobs, among direct and indirect jobs and those generated throughout the supply chain, with 50 permanent workers once the plant is in operation.

This project combines the efforts of ACS's Services, Communication and Energy industrial group in innovation and cost reduction, enabling us to achieve the following technological milestones: building the biggest power plant of this type ever, to develop a thermal system for 10 hours of storage, thanks to the experience acquired in its previous projects, to implement operating and maintenance experience in the project, to develop the first plant with a hybrid cooling system to reduce water consumption and to eliminate the use of natural gas as a fuel in case of emergency. All these factors make the project the most innovative to date in the thermal solar industry and in the field of renewable energy.



HNPS PROJECT



“HNPS - Heterogeneous network for European public safety” is a EUREKA project co-financed from the Spanish Ministry of de Industry, Tourism and Trade’s AVANZA I+D programme.

The project develops the concept of a heterogeneous network to establish communications that help to manage a safety crisis. This concept is based on the integration of various communications networks, including ad hoc rapid deployment systems. The project focuses on the integration of existing communication systems, including private mobile radio systems such as TETRA and TETRAPOL, and the latest developments in the area of next generation network architectures and management are considered.

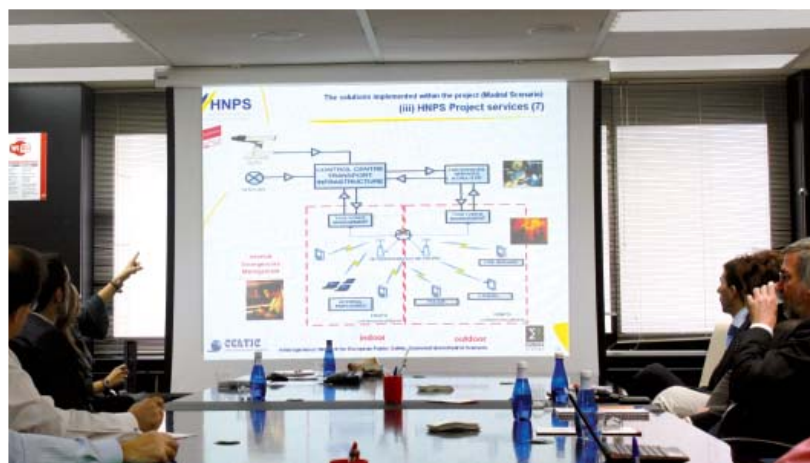
The heterogeneous network concept enables rapid integration of available communication resources in case of crisis or disaster and allows optimisation of resource allocation to support the daily operations of emergency services. Furthermore, it will provide these agencies with a series of advanced digital services to facilitate their daily operations. The heterogeneous network concept enables the authorities responsible for public safety to use public communications networks for more efficient and reliable emergency management.

SICE has been the technical coordinator for the pilot installed at the Moncloa, Madrid transport interchange, which consists of the following applications:

- An analytical video application: used on the video surveillance system for automatic recognition of “possible risk situations” inside one of the toilets (suspicious package left, risk of mugging, head count).
- An Emergency Resource Management application which makes semi-automatic allocation of the available resources closest to the incident depending on their closeness to the incident, professional profile, time and the incident to be resolved. The resources are

notified in real time by receiving an e-mail to their roaming telephones.

- A Wireless Communications application which locates the resources and enables rapid deployment in the case of lack of coverage.
- The HNPS, “Heterogeneous Networks for Public Safety” project was awarded the Bronze CELTIC Excellence Award 2012 at an event held in Stockholm on 22 February last year. This recognises teamwork and the results obtained.



6. COMMITMENT TO TECHNOLOGICAL DEVELOPMENT

FOTSIS PROJECT

To improve road safety associated with a motorway, ITS systems have been implemented for traffic control and management, also allowing optimisation of levels of comfort and service. The current systems are designed so that those responsible for traffic management have appropriate information enabling them to manage it efficiently. Interaction with drivers on their route, though, is minimal and is managed, basically, through Variable Message Signs.

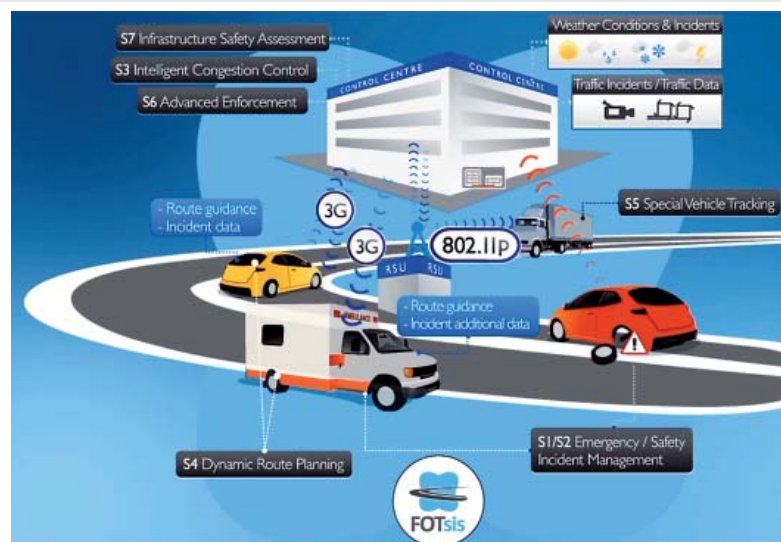
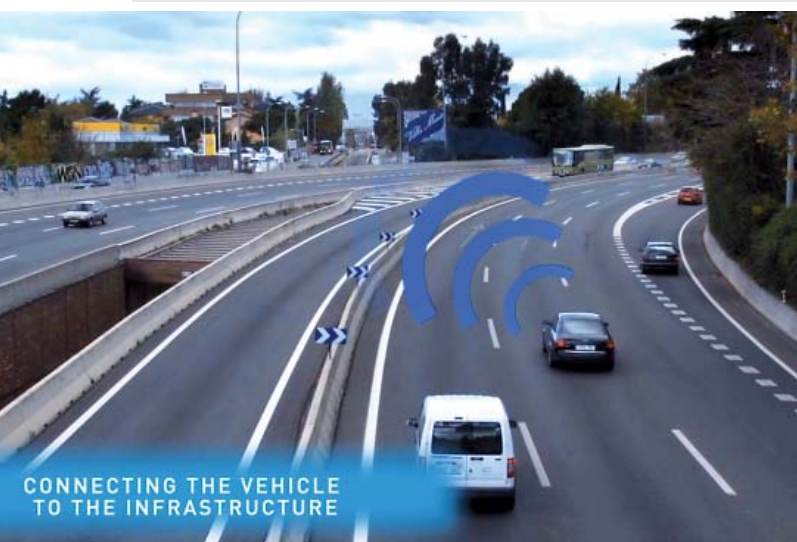
However, through the deployment of I2V - V2I (Infrastructure - Vehicle, Vehicle - Infrastructure) cooperative services, the aim is to manage to connect the vehicle to the infrastructure so that the different drivers can be better informed and make safer, better coordinated and "smarter" use of motorways on their journeys.

The potential of this technology is being shown to be effective thanks to the "controlled deployment" of projects known as FOTs (Field Operational Tests) in real scenarios. This is being made possible as a result of the technological development supported by ambitious research programmes.

As such, FOTs is one of the two Integrated Projects (IPs) co-financed by the European Commission through the Framework Programme (FP7) and, therefore is a European reference "technological showcase" in the field of cooperative systems. The project is led by Iridium Concesiones de Infraestructuras and SICE plays a technological role in it as the leader of the cooperative services to be deployed in the field of road safety. This deployment is planned for 2013 on controlled motorway stretches.

One of the services consists of being able to supply information en route to drivers through smartphones and tablets. As such, there is a module in the control centre which transforms the information collected by the ITSs into useful information for drivers.

This information is structured by means of pre-configured templates for each type of information event, in a similar way to the information which appears on Variable Message Signs (VMSs). That is, pictograms representing the incident are shown with colours indicating the hazard level and a short message (text to speech) which can be read in the language of the user's device.





Furthermore, the user can configure the level of criticality or the route he or she is to take in order to be able to customise the information he or she wishes to receive. This information can also be broadcast through channels such as Twitter.

The other service developed is intended to offer useful information in real time to Emergency Centres (112) when a traffic accident occurs. This information is collected by the infrastructure's own ITS equipment or the traffic control centre's operators with the intention of offering additional useful information which is not currently supplied to the emergency services.

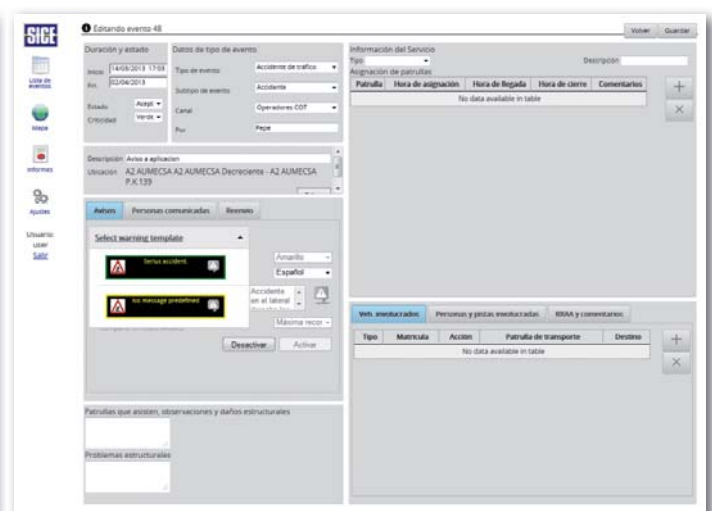
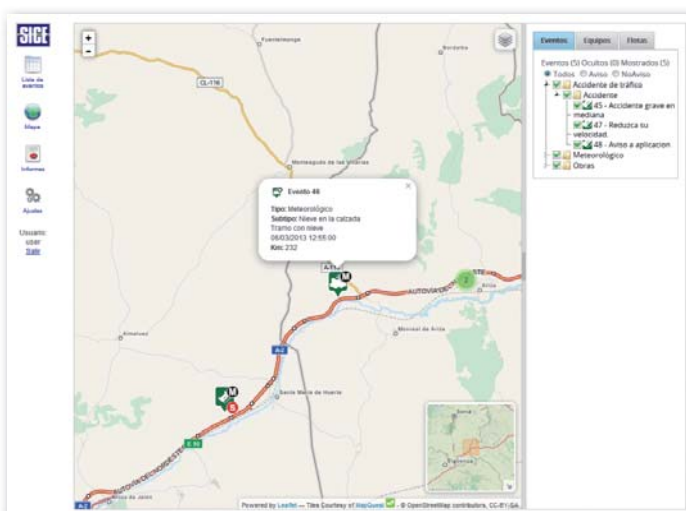
So, for example, if the concession holder has captured the accident with a camera, the emergency centre operator will have the chance to display an image of the accident, giving the possibility of getting a real, objective idea of the situation (and avoiding relying on a subjective oral description from the operator by phone).

On the other hand, an application has been developed which allows information to be collected in situ using tablets so that this information can also be provided to the control centres and the emergency services.

This application would be carried by the concession operator's or civil guard's fleets of vehicles which travel to help and/or signal the accident.

Finally, critical factors such as the appropriate dimensioning of the communications networks used (3G and Mobile WiFi) and establishing and developing mechanisms to ensure broadcasting, service continuity and the quality and expiry of the information will be analysed. It is also fundamental to make progress in standardisation and in defining interoperability requirements, which means working with technical standardising committees such as ISO TC 204 to achieve standardisation of the CALM (Communications, Air Interface, Long and Medium Range) wireless communications framework.

The future impact that widespread deployment of these services could have is such that in the ITS Directive itself, approved in July 2010, connection of the vehicle to the transport infrastructures was indicated as a priority field and this recommended free provision of road safety related information services to all users.



7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.1. The Protection of the Environment in the ACS Group

2012 Milestones

DRAGADOS

Recovery of construction and demolition waste (CDW) reached 75.5%, surpassing the annual target set. BREEAM Certification was obtained for the head office building, becoming the first BREEAM ES "In Use" sustainability certificate for offices awarded in Spain. Production certified under ISO 14001 reached 100%.



Implementation of the Energy Management System in Cobra Instalaciones y Servicios, S.A.'s head office building, in accordance with the ISO 50001:2011 standard.



ISO 14001 certification for Eyrega, Trecisa, Rinza, Axil 3 Ingenieros and Urbaser Environnement's Marseilles incinerator plant.

UNE-EN-ISO 50001 energy management standard certification for the Southern Zone Municipal Waste Treatment joint venture and adaptation of URBASER's certification to this.

Expansion of Urbaser's ISO 14001 scope to sports facility management.

Expansion of Sertego's ISO 14001 certification to treatment of hydrocarbonated water and out of service tyre storage.



Carrying out of two projects with great environmental impacts; the Calaveras Dam and the ILM high voltage line.



Leighton has worked closely with the Australian government. In the "Analyses of diesel use for mine haul and transport operations", for example, there was close cooperation with the Department of Resources, Energy and Tourism. Leighton Contractors' contribution consisted of developing a reference ratio for evaluating the energy consumption of all the trucks operating in a mine.



Review and updating of the company's Management Manual and the Environmental Management Plan for Works. Increase in the percentage of works visited to monitor implementation of the Management System for Environmental aspects in relation to the amount of work executed.



Environmental management (waste management, materials purchasing, supplier distances, slope controls, etc.) according to LEED criteria in the year's most emblematic works.



Start of numerous programmes in the equipment purchasing area, including emissions control systems installation, preventive maintenance and alternative fuel sources.



Reduction of fuel consumption in the maintenance vehicle fleet and hence also CO₂ emissions. Awarding of the @ asLAN Prize for Public Authorities and Bodies to Madrid's EMT with ETRA's EfSAE System, recognising it as an outstanding success story due to the cost reductions and efficiency improvements generated.

Challenges for 2013



Gradual incorporation of the IFC (International Finance Corporation) performance standards.

Approval of some processes affecting Cobra Instalaciones México's Comprehensive Management System, with the Occupational Risk Prevention System from Spain and Cobra Proyectos Integrados México's Quality Management System.

DRAGADOS

To achieve a construction and demolition waste (CDW) recovery ratio of over 78%.



ISO 14001 certification for the Urbaser-Interjardín joint venture (Santa Cruz de Tenerife gardens).

ISO 14001 certification for KDM Energía (Chile).



Development of CO₂ emission saving policies.

POL-AQUA

To increase waste management supervision by increasing the frequency of the internal audits carried out, based on an environmental management system.

Developing methods for monitoring the impact of construction processes on the environment.



Implementation and certification of an Energy Management System.

Dragados Offshore

Reduction of Wastes (Hazardous and Non-Hazardous) by 20%.

Putting the environmental auditing tool into service.

Replacement of the current hazardous waste store.



Receipt of the "Socially Responsible Company 2013 Logo" in SICE Mexico; including implementation of processes, improvements and achievements in environmental protection matters, quality of working life, ethics and links to the community.



To maintain the target of zero environmental incidents in projects being executed.

7.1.1. Strategic Priorities

The ACS Group²³ combines its business objectives with protection of the environment and appropriate management of its stakeholders' expectations in this regard. ACS's environmental policy is intended to be a framework in which, on the one hand, it defines the general lines (principles) to be followed and, on the other hand, it collects the particular features of each business line and each project (articulation).

The principles are the ACS Group's general environmental commitments. These are sufficiently flexible as to accommodate the elements of policy and planning developed by the companies in the different business areas. In addition, these commitments need to keep within the requirements of the ISO 14001 Standard:

- Commitment to complying with the legislation.
- Commitment to preventing pollution.
- Commitment to continuous improvement.
- Commitment to transparency, communication and the training of Group employees, suppliers, clients and other stakeholders.

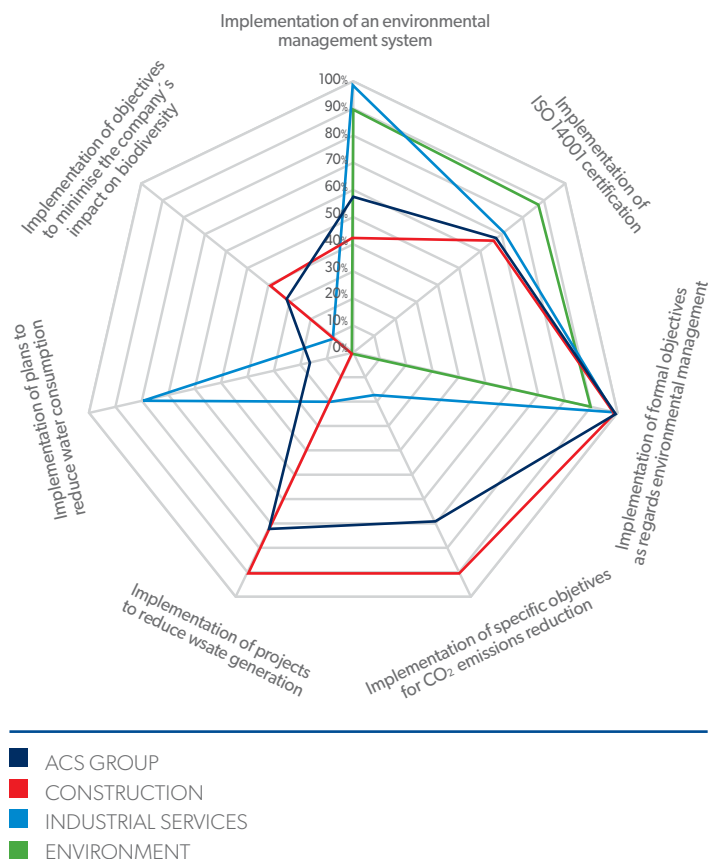
To be able articulate and deploy a policy on these environmental commitments, the most significant are identified at corporate level and are compared with each company's management system and the environmental priorities for each business. For each of these common priorities, which later become common to the majority of the ACS Group, objectives are set and improvement programmes are established individually from company to company.

THE ENVIRONMENTAL COMMITMENT FROM THE ACS GROUP IS GUIDED BY THE ISO 14001 AND IS ADAPTED TO THE MANAGEMENT SYSTEMS OF THE DIFFERENT BUSINESSES TO FACE THE SPECIFIC NEEDS OF EACH COMPANY

7.1.2. Management Model

The following is a map outlining the main common features of ACS Group company management models and summarising their initiatives and degree of implementation:

POLICY MAP AND IMPLEMENTATION LEVEL



²³ The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by level of turnover. The data are expressed in terms of percentage of total Group sales in 2012.

Level of implementation as reported by ACS Group companies and according to the level of sales of each of them.

7. COMMITMENT TO THE NATURAL ENVIRONMENT

The significant level of implementation of an environmental management system, present in companies representing 55.8% of Group sales, is based on the objective of seeking adoption of the ISO 14001 standard in the majority of the Group's activities, which is already implemented in 68.0% of ACS Group sales²⁴.

The responsibility of overseeing the ACS Group's environmental performance falls to the Environmental Department in each company. In general, the following common, general and most significant characteristics were found in ACS Group companies' management of environmental impacts:

- They themselves, in a decentralised and autonomous manner, develop their own policies and action plans (in ACS, companies representing 96.0% of its sales define formal environmental objectives periodically and, furthermore, 25.0% reward their workers according to fulfilment of these objectives).
- They also implement certification schemes and external independent audits (55.8% of the ACS Group's production was audited in 2012).
- They carry out environmental audits (724 in 2012).
- Companies representing 71.6% of ACS Group sales have some kind of centralised database to collect environmental data.
- Companies representing 33.0% of ACS Group sales have an incident reporting system for detailing near misses relating to environmental matters. A total of 967 environmental incidents occurred in 2012, which involved the origination of a total of 20 sanctioning administrative proceedings.

SPECIFICALLY AND OPERATIONALLY, THE MAIN ENVIRONMENTAL MEASURES REVOLVE AROUND FOUR KEY AREAS, ON WHICH THE ACS GROUP'S COMPANIES POSITION THEMSELVES EXPLICITLY:

- **THE FIGHT AGAINST CLIMATE CHANGE,**
- **PROMOTION OF ECO-EFFICIENCY,**
- **WATER SAVING AND**
- **RESPECT FOR BIODIVERSITY**

²⁴ Although this is not the only certification, as companies representing 78.13% of ACS Group sales reported having obtained another type of certification, many of them in addition to ISO 14001.

| Sanctions due to breaches of environmental regulations | 2010 | 2011 | 2012 |
|---|-----------|-----------|----------|
| Number of environmental incidents | 1,219 | 1,601 | 967 |
| Number of environmental incidents with sanctioning administrative proceedings | 32 | 33 | 20 |
| Cost of fines due to sanctioning administrative proceedings (€) | 196,469.7 | 154,600.0 | 38,847.6 |

7.1.3. Main Environmental Indicators

| The ACS Group's main environmental indicators | 2010 | 2011 | 2012 |
|---|-------------|-------------|--------------|
| Water consumption (m ³) | 6,772,361.0 | 5,577,931.0 | 10,067,651.8 |
| Production certified under ISO 14001 (%) | 71.7% | 72.6% | 68.0% |
| Direct emissions (Scope 1) (tCO ₂ eq) | 1,998,929.4 | 1,742,344.1 | 1,569,460.3 |
| Indirect emissions (Scope 2) (tCO ₂ eq) | 108,948.8 | 151,738.3 | 246,757.7 |
| Indirect emissions (Scope 3)* (tCO ₂ eq) | 4,391.8 | 13,620.2 | 93,781.8 |
| Non-hazardous waste sent for management (t) | 824,735.0 | 1,168,706.0 | 1,274,105.8 |
| Hazardous waste sent for management (t) | 200,949.0 | 186,989.5 | 88,182.4 |

* Due to employee travel.

- The increase in water consumption is to a great extent due to the inclusion of water for industrial use, data on which was not collected in previous years. Detail on these data is given later in this report.
- The change in CO₂ emissions occurred as a result of the reduction experienced in Urbaser, the Group's main emissions generator.
- Indirect Scope 3 emissions increased significantly given that the scope of measurement has increased to a larger number of ACS Group companies.



7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.1.4. Climate Change

The ACS Group shares with society the growing concern over climate change, hence it has an active policy for reducing its greenhouse gas emissions in companies representing 71.3% of ACS Group sales.

According to data obtained from ACS Group companies and turnover accounted for in 2012, total Scope 1 emissions over sales (Carbon Intensity) was 41 tonnes of CO₂ per million euros of turnover, 33.0% less than in 2011 as a result of the reduction of Urbaser's emissions and the increase in turnover resulting from the integration of HOCHTIEF, with its activities having low CO₂ emission intensity. In comparable terms, including all of HOCHTIEF's sales for 2011 and not just those recorded since June, the reduction seen in the ratio is 13.5%.

The main challenge is to understand and quantify all the ACS Group's emissions. Each company is responsible for maintaining an inventory of emissions, in which the main sources of these are identified. This enables custom action plans to be developed for each company. Companies representing 73.3% of ACS Group sales have already defined a method for measuring the carbon footprint of their activities²⁵.

The ACS Group's strategy in the fight against climate change is based on proper management of fossil fuels, on renewable energies, on energy efficiency and saving and on sustainable travel. The results expected as a consequence of active policies for containing climate change are:

- Reduction of direct emissions by means, for example, of the implementation of new production processes.
- Reduction of indirect emissions by moderating fuel consumption, for example, and promoting energy efficiency.
- Analysis of the possibility of implementing Energy Management Systems (in accordance with UNE-EN ISO 16001 certification, where appropriate).
- Training of employees, raising client awareness and monitoring of suppliers.

- The financial consequences of climate change for each company's business has begun to be measured. Indeed, companies representing 19.3% of Group sales already carry out this type of analysis.

Another key aspect lies in the promotion of the use of renewable energy or sources less intensive in carbon, as well as the use of the best technologies in the combustion of fossil fuels as two fundamental aspects to reduce CO₂ emissions.

The ACS Group has extensive experience in the development of and participation in renewable energy projects. The ACS Group participates in the operation of renewable energy plants (mainly wind and thermal solar), specifically:

- At 31/12/2012, the total wind power installed in Spain was 936 MW. These farms produced a total of 1,335 GWh during 2012²⁶.
- Outside Spain at 31/12/2012, there were 128 MW in Portugal that generated 296 GWh and 102 MW in Mexico which produced 146.3 GWh.
- In turn, at 31/12/2012 the ACS Group had an installed power in Spain in thermal solar plants of 249.5 MW, which produced a total of 671.7 GWh in 2012²⁷.

This represents a total of 2,449.1 GWh.

²⁵ Emissions inventories will not be limited solely to the ACS Group's operational scope, but will also cover the activities associated with the life cycle of its services and products. ACS is developing a database to measure the emissions from its supply chain. Once this database is sufficiently extensive, the results will be published.

²⁶ This figure is made up of electricity production which obtained the guarantee of renewable origin from the Spanish National Energy Commission (CNE), totalling 845.9 GWh, and another 489.1 GWh which did not obtain the CNE's guarantee of renewable origin.

²⁷ This figure is made up of electricity production which obtained the guarantee of renewable origin from the Spanish National Energy Commission (CNE), totalling 531.8 GWh, and another 139.9 GWh which did not obtain the CNE's guarantee of renewable origin.

PROTECTION AGAINST CLIMATE CHANGE IN LEIGHTON



As the reality of climate change continues to drive global transformation toward a more resource-efficient and lowcarbon economy, many governments and regulators around the world have sought to address these issues through mechanisms such as usage restrictions, taxes and other market-based pricing mechanisms, adding pressure to business to act.

The Leighton Group, as large energy users and operating in some tight regulatory environments, such as Australia where a price on carbon was introduced July 1, 2012, recognize the need to develop and implement cleantech and sustainability strategies to mitigate the risks and seize the opportunities of climate change and associated regulations.

One area where the Leighton Group, HOCHTIEF's Australian majority shareholding, is focused is optimizing fuel consumption and emissions released by mining vehicles and equipment fleets. To this end, the Leighton Group works closely with the Australian government. In the case of the "Analyses of Diesel Use for Mine Haul and Transport Operations" study, for instance, this cooperation was with the Department of Resources, Energy and Tourism. Leighton Contractors' contribution was to develop the "Best Truck Ratio" model, which serves as a benchmark for assessing the energy consumption of all trucks in operation on a mine site. Actual energy use is then compared with the theoretical best performance for those machines. As a result, this tool serves as a yardstick not only for a fleet's efficiency but also the remaining margin for improvement. Since the model relies on a ratio, a single benchmark can be applied to different mining projects.

With a view to achieving a better energy balance, Leighton Group subsidiary Thiess has, among other things, introduced to its projects trucks with an optimized load bed shape and size so as to reduce the quantity of vehicles required and the number of trips undertaken. As part of the "Hunter Expressway Alliance" road building project in the Australian state of New South Wales, Thiess tested hybrid excavators for the first time. The aim was to ascertain whether hybrids were in fact lighter on fuel by directly comparing them and conventional high-performance excavators when performing the same work.

The outcome? While keeping pace with the standard excavators' productivity rates, the hybrids burned on average eleven liters of gasoline per hour—30 percent less than their counterparts. During the trial phase of the project alone, the hybrids saved roughly 4,500 liters of fuel and ten metric tons of CO₂.



7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.1.4.1. Direct GHG Emissions (tCO₂eqv.)²⁸

| Direct (Scope 1) greenhouse gas emissions (tCO ₂ equivalent) | 2010 | 2011 | 2012 |
|---|--------------------|--------------------|--------------------|
| Construction | 57,597.6 | 80,737.0 | 143,868.2 |
| Industrial Services | 125,578.0 | 43,173.6 | 43,153.5 |
| Environment | 1,815,753.8 | 1,618,433.4 | 1,382,438.7 |
| Group Total | 1,998,929.3 | 1,742,344.1 | 1,569,460.3 |

7.1.4.2. Indirect GHG Emissions. Group Total (tCO₂eqv.)

| Indirect greenhouse gas emissions (tCO ₂ eqv.) | 2010 | 2011 | 2012 |
|---|-----------|-----------|-----------|
| Emissions derived from electricity consumption (Scope 2) | 108,948.8 | 151,738.3 | 246,757.7 |
| Emissions derived from employees' travel (Scope 3) | 4,391.8 | 13,620.2 | 93,781.8 |

7.1.5. Eco-Efficiency

The ACS Group attaches a priority to efficiency in resource consumption and reduction of waste generation, as an effective strategy in these aspects implies benefits from two angles. On the one hand, it reduces the environmental impacts on the surroundings and, on the other, it cuts the costs needed for their purchase or treatment.

To this effect, the ACS Group strategy is based on two fundamental aspects:

- The implementation of projects to reduce waste generation, an exercise which takes place in companies representing 73.2% of ACS's sales.
- The carrying out of projects to reduce material and/or raw material consumption, which takes place already in companies representing 75.5% of ACS Group sales.

In addition, there is notable implementation of policies in relation to the application of sustainable building standards²⁹. These are applied in those cases in which the client accepts them, given that the ACS Group in the great majority of cases works for third parties in building development. These sustainable construction policies apply to the companies' main activities, representing 40.5% of ACS's sales.

²⁸ For the preparation of this report, Urbaser, the company with the greatest impact on this aspect in the ACS Group, adopted a method for calculating emissions in which the emission factors were obtained from calculations carried out by Urbaser's personnel based on a pre-established mass balance and on the emission factors and formulas which appear in the E-PRTR methodology (European Pollutant Release and Transfer Register) and on the 3rd edition of Solid Waste Management and Greenhouse Gases: A Life-Cycle Assessment of Emissions and Sinks, published by the US EPA.

The data on emissions to dumps refers to the emissions equivalent to CO₂ which the wastes deposited in the corresponding financial year will produce over a period of 26 years.

To calculate the emissions for the rest of ACS's areas, the IPCC's emission factors were used, which were applied to the data for activity obtained using the GHG Protocol guidelines.

²⁹ For example, systems for sustainable building certification LEED – Leadership in Energy & Environmental Design, BREEAM – BRE Environmental Assessment Method, LCC – Life Cycle Cost Results, etc.

SUSTAINABLE BUILDING STANDARDS



HOCHTIEF, through Turner in the United States and Leighton in Australia, carries out building activities in accordance with sustainable building standards.

- Since the year 2000, over 500 Turner projects have been registered and certified under LEED. In addition, Turner has adopted many of the sustainable practices which are characteristic of these types of certification in the carrying out of its normal business.
- Leighton Properties, Leighton’s company specialised in property development, uses the GBCA’s –Green Building Council of Australia– Australian Green Star Methodology in carrying out its building activities.



7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.1.5.1. Waste Treatment

Special importance is attached to the wastes section, as the provisioning part depends predominantly on the client's needs and requests. Hence, more resources, efforts and policies are dedicated to the handling of wastes than to any other discipline in eco-efficiency.

In this respect, the ACS Group segregates, stores and appropriately manages its wastes. Its management is always aimed at minimising the wastes generated, both in terms of quantity and of their hazards, on giving priority to recycling and reuse above other management options and in energy recovery as the preferred choice as against dumping.

Waste is managed in accordance with the regulations in force in each country. The facilities have the corresponding authorisations for

producers of hazardous waste, which allow for their recording, inventory taking, storage and management. The non-hazardous wastes generated or managed are sent to dumps, collected by an authorised handling company, reused, recycled or recovered.

The ACS Group also generates other hazardous wastes or wastes with specific regulation which need to be treated respectively by an authorised hazardous waste handling company or Integrated Waste Management System. Hazardous waste is, in general, delivered to authorised handling companies in accordance with the legislation in force.

³⁰ Up to 2010, the ACS Group only measured the tonnage of wastes treated in its CSR report. Since 2011, we have presented the total waste generated and, of these, those reclaimed (sent for management: composting, reuse, recycling or recovery). The figure for the ACS Group's Total Generated Waste does not include soil from excavations in the Construction activity, the data for which can be found in section 7.2.3 of this document.

| ACS Group's Total Generated Waste | 2011 | 2012 |
|---|-------------|-------------|
| Total non-hazardous waste generated (t) | 1,168,706.0 | 1,274,105.8 |
| Total hazardous waste generated (t) | 186,989.5 | 88,182.4 |

| Waste treatment | 2010 | 2011 | 2012 |
|---|-----------|-----------|-------------|
| Total non-hazardous waste sent for management (t) | 824,735.0 | 858,738.7 | 1,274,105.8 |
| Total hazardous waste sent for management (t) | 200,949.0 | 186,989.5 | 88,182.4 |



7.1.5.2. Rationalisation of Energy and Material Resource Consumption

A large portion of the natural resources consumed by ACS Group companies is used efficiently. To achieve this, the best available technologies are used as regards efficiency and reduction of material and energy resource consumption.

According to reports from Group companies, 4,246.2 MWh of energy were saved in 2012 thanks to conservation and improvements in energy efficiency.

The main use of petrol and diesel in ACS Group companies is transport of materials, personnel, earth movement and the use of certain machinery necessary for the company's operational activities.

| ACS Group provisioning. Main items | 2011 | 2012 |
|--|-------------|-------------|
| Total wood purchased (t) | 19,551.0 | 11,111.0 |
| <i>Certified wood (%)</i> | 20.3% | 33.4% |
| Total steel purchased (t) | 388,560.0 | 663,781.1 |
| <i>Steel manufactured with recycled materials (%)</i> | 29.7% | 46.7% |
| Total cement / concrete purchased (t) | 3,048,316.0 | 4,977,600.8 |
| <i>Cement / concrete which includes recycled aggregates (%)</i> | 0.1% | 0.0% |
| Total aggregates purchased (t) | 7,905,170.0 | 6,878,754.4 |
| <i>Recycled aggregates (%)</i> | 23.6% | 0.8% |
| Total glass purchased (t) | 1,408.0 | 159.0 |
| <i>Recycled glass (%)</i> | 0.0% | 0.0% |
| Total pipes / insulation (generally PVC) purchased (t) | 779.0 | 4,137.0 |
| <i>Recycled pipes / insulation (generally PVC) purchased (%)</i> | 0.0% | 0.1% |

| Direct and indirect energy consumption, by source | 2010 | 2011 | 2012 |
|---|-----------|-------------|--------------|
| Petrol + diesel consumed (million litres) | 94.6 | 114.2 | 104.2 |
| Natural gas consumption (m ³) | 897,866.0 | 1,184,488.3 | 2,136,012.7 |
| Natural gas consumption (kWh) | n.d. | n.d. | 35,137,353.7 |
| Electricity consumption (MWh) | 390,497.6 | 466,720.3 | 811,970.1 |

7.1.5.3. Other Emissions

Ozone-depleting substances have disappeared from almost all areas, except for a very small amount in Industrial Services. Specifically, these are leaks of refrigerant gases which can no longer be commercialised and have progressively

disappeared from the facilities. The most important change in this indicator comes from Environment, where they report the use of other gases with no impact on the ozone layer, but which do have a greenhouse gas effect, and which are included in Scope 1 emissions.

| Other emissions, Group total (t) | 2010 | 2011 | 2012 |
|--|---------|---------|---------|
| Emissions of Oxides of Nitrogen (NO _x) | 2,115.0 | 1,077.2 | 5,224.9 |
| Emissions of Oxides of Sulphur (SO _x) | 447.0 | 193.0 | 274.0 |
| Emissions of solid particles | 153.0 | 9.9 | 31.2 |
| Emissions of substances that deplete the ozone layer | n.d. | 5,105.5 | 0.0 |

7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.1.6. Water

The activities carried out by the ACS Group involve considerable water consumption, especially in the construction field. As such, the company recognises the need to reduce consumption of this natural resource, especially in zones where there is water stress. As far as possible, and whenever the projects' characteristics so permit, recycled water which is unfit for human use is employed.

The keys to the ACS Group's strategy for reduction of water consumption are summarised in three points:

- Implementing appropriate measurement systems (at project, company and corporate level), permitting detailed knowledge of the main sources for consumption. Companies representing 55.6% of ACS Group sales reported these data in a detailed form.
- Carrying out actions which promote reduction of water consumption or which encourage the consumption of recycled water. Companies representing 15.1% of ACS Group sales have established plans for reducing water consumption in their activities.

Driving and developing operational policies for water management and desalination. The ACS Group currently builds and operates desalinating plants in Spain and Algeria.

The ACS Group has numerous measures aimed at reducing water consumption, such as raising employee awareness, reuse of cleaning water and the use of rainwater.

The ACS Group pays attention to improving its management and use of water, with special consideration for those works located in geographical zones with water stress. As such, ACS has been making efforts for many years in the south-east part of the Iberian Peninsula and on the Canary Islands, these being locations which have frequent water deficits. The Environmental Management System considers water stress as an additional variable in the evaluation criteria for the "water consumption" parameter, which leads to the initiation of preventive measures to optimise water consumption and the monitoring of the effectiveness of these measures.

Lastly it is worth emphasising that the ACS Group carries out exhaustive monitoring of the quality of water discharged to the natural environment. In this regard, all monitoring carried out meets legal demands, such that significant effects do not occur in the natural environment³¹.

| Water consumption (m ³) | 2010 | 2011 | 2012 |
|---|-------------|-------------|--------------|
| Obtained from the public mains | 2,744,035.1 | 2,873,426.8 | 3,766,705.6 |
| Obtained from other sources | 4,028,325.9 | 2,704,504.2 | 2,911,139.7 |
| Unfit for human consumption (obtained from purifiers, recycled water, etc.) | n.d. | n.d. | 3,389,806.4 |
| Total | 6,772,361.0 | 5,577,931.0 | 10,067,651.8 |

| Total waste water discharges (m ³) | 2010 | 2011 | 2012 |
|---|-------------|-------------|-------------|
| To the public network | 1,490,209.5 | 2,706,544.7 | 2,221,489.7 |
| Discharges to the sea or rivers/lakes | 6,524,886.8 | 1,429,681.0 | 1,080,671.4 |
| Waste water discharges to specific water receiving facilities | n.d. | n.d. | 986,324.9 |
| Total | 8,015,096.2 | 4,136,225.7 | 4,288,486.0 |

³¹ Accidental water spills totalling 92.37 m³ occurred in 2012.

7.1.7. Biodiversity

The ACS Group's activities generate impacts on the natural environment where the works are executed. The implementation of measures to conserve the flora and fauna is one of the environmental principles applied in planning operations. These measures are based on physical protection, transplanting or transfer, as well as on respect for the life cycles of the plant and animal species affected.

The ACS Group tries to minimise the environmental effect of its activities, especially when these take place in areas of high ecological value. Companies representing 32.8% of sales have set targets for minimising the impact of their activities on biodiversity. Projects are planned with the objective of minimising their environmental impact and, as far as possible, are carried out under the methodology which causes least damage in the setting.

The ACS Group prepares environmental impact studies, which attempt to minimise the possible adverse effects of projects on the natural environment. Public participation in procedures to approve these projects is guaranteed by the national and regional legislation in each of the countries where they are carried out.

At the end of 2012, a large number of Group companies, representing 39.4% of sales, were carrying out projects located in areas of high biological value, or in their vicinity.

The company also has supervision plans which guarantee the fulfilment of the preventive measures and reduce the impact of projects and processes not subject to environmental impact assessments. Furthermore, various initiatives or specific activities for restoration of habitats affected by the activities of various of the Group's companies were carried out during 2012.³²

- In all its civil engineering works, Dragados develops a Restoration Plan for the areas affected after completion of the works.
- Replanting on completing projects in Vías.
- Restoration activities in various animal species habitats.
- Leighton is one of the world's most important mining contractors and, after completing its activity in the mines, it restores the land affected to recover the conditions of the local ecosystems.
- Urbaser carries out projects to seal and replant dumps, when necessary.

For example, control and monitoring was reported of Group companies' impact on 21 species threatened with extinction in areas influenced by Group companies' projects or activities.

In short, the ACS Group includes the commitment to conservation of biodiversity in its environmental management systems, to meet the following objectives:

- To assess the impacts of the activities on the environment.
- To research, develop and offer its clients innovations which improve environmental conditions.
- To manage the impact and minimise its consequences.

³² The existence of these activities was reported by companies representing 33.4% of ACS Group sales.

7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.2. Construction

Construction activity can, on occasions, have a powerful impact on the environment. Although this effect is usually temporary, the ACS Group's Construction companies³³ attempt in various ways to identify these impacts beforehand in order to minimise or completely avoid their effects on the environment.

One of the Group's most active companies is Dragados, which positions itself as the reference company in developing environmentally friendly initiatives and policies.

The main environmental impacts of construction projects are related to consumption of water and materials and their origin, waste generation, earth movements and with effects on biodiversity.

³³ The data referring to the ACS Group's Construction companies included in this section were calculated by analysing the information supplied by the different companies in this area of activity, weighted by level of turnover. The data is expressed in terms of percentage of total Construction area sales.

Level of implementation of good environmental practices as percentage of sales in the **CONSTRUCTION** area

2012

| | |
|---|-------|
| Implementation of an environmental management system | 44.1% |
| Implementation of ISO 14001 certification | 66.3% |
| Implementation of formal objectives in environmental management matters | 95.9% |
| Implementation of specific targets for reducing CO ₂ emissions | 88.0% |
| Implementation of projects for reducing waste generation | 89.5% |
| Implementation of plans to reduce water consumption | 1.6% |
| Implementation of objectives to minimise the company's impact on biodiversity | 40.7% |



A4 MOTORWAY: WIERZCHOSŁAWICE-KRZYŻ STRETCH

The A4 motorway runs through the Małopolska region, in the provinces of Wieliczka, Bochnia, Brzesko and Tarnów. Specifically, the works start before the Wierzchosławice junction and end after the Krzyż interchange.

Fundamental environmental aspects had already been considered in the motorway project. Noteworthy among these are:

- The construction of 15 km of acoustic panels in order to protect houses close to the highway from excessive noise.
- The construction of preliminary purification facilities for water from precipitation.
- The construction of waste water purification plant in the MOP II Rudka and MOP III Komorów rest areas.
- Landscaping plantations to perform protective and aesthetic functions, as well as forming biotic communities in their own right, in the form of strips, rows or groups of trees and shrubs, as well as to fill the edge of forest groupings separated by the road (strip 8 - 15 m wide).
- The construction of passes for fauna allowing them to migrate through significant ecological routes and ensuring ecological connection of lands separated by the motorway.
- The execution of a fence on both sides of the road and together with openings and passes for animals (approx. 100 m each side).
- The maintenance areas are located outside the defined exclusion zones:
 - Natura 2000 European Ecological Network.
 - Zones of particular environmental value, such as the floodable lands of the river Dunajec.
 - Nature reserves: Dębina and Debrza.
 - Forest areas or neighbouring inhabited areas.

During construction, both in planning the works and their execution, particular attention was paid to the environment, with various preventive measures adopted.

The amount and type of fuel used (ecodiesel) was taken into consideration and monitoring carried out to detect possible peaks in consumption. Similarly, monitoring was carried out on equipment technical condition, combustion gas emission composition measurements and measurements of the noise and vibration levels caused. The aim of all the above was to reduce the works' impact on the environment and surroundings as far as possible.

The storage and maintenance areas, as well as the works roads, were organised so as to make possible economic use of the land and minimal surface alteration.

- To achieve this, the roads from the borrow pits to the works execution area were laid out based on the network of service roads to be executed in the project.
- Restoration plans were implemented in the exploited borrow pits to result in artificial lakes, which were profiled, recovered and finished in excellent condition after exploitation to obtain approval from the mining authority.

To optimise natural resource consumption, the possibility of reusing by-products from the works or from other industrial processes in the area was considered.

- Due to the characteristics of the materials in the area, the embankment was made by stabilising local material, extracted almost entirely from below the water table. Among other materials, blast furnace slag and ash were used in this stabilisation, so reusing waste from the local thermal power station and considerably reducing the dumps of this sort of waste located around the city of Tarnów.
- Similarly, the filler resulting from the manufacture of the asphalt mixtures was used as a binder to stabilise the embankments, so reducing the external consumption of binder and eliminating the need to remove this waste for dumping.

Additionally, the product resulting from the milling carried out during execution was used to make the access routes from the service roads to private plots or houses.

The waste it was not possible to use was sorted and stored in appropriate containers, located in an area set aside for the purpose and was then collected and transported to recycling facilities.

The trees and shrubs located within the site or nearby, which were at risk of damage and which it was not planned to remove, were protected against mechanical damage and soil pollution.

All vegetation losses were compensated for by introducing new plantations, taking the requirements of their habitat into account.

Alterations or limitations to the flows of surface streams and underground waters were reduced as far as possible, as were alterations to the directions of water flows.

The earth works in water courses were carried out outside the period of mass migration of amphibians and special care was taken not to cover oxbow lakes and ponds with material during execution and if this was necessary, the pond or stream was checked first, before covering it, to check for the possible presence of amphibians. The specimens found were recovered and transported to another place, far enough away to prevent them returning to the covered pond.

- In order to protect and ensure the safety of the animals along the highway, fences were placed on either side of the execution area, which prevented the entry of animals to the area.

The A4 motorway works were a priority stretch on the road network planned for building in the light of the organising of the Euro 2012 football championships in Poland. However, care and protection of the environment was ever present in this race against time.



7. COMMITMENT TO THE NATURAL ENVIRONMENT



7.2.1. Initiatives to Reduce Water Consumption

- Good environmental practices are applied to minimise consumption, especially of water.
- Reuse of water from machinery cleaning in works.
- Awareness campaigns were organised with guidelines to reduce water consumption.
- Use of rainwater.

Water consumption (m³). CONSTRUCTION

| | 2010 | 2011 | 2012 |
|---|-------------|-------------|-------------|
| Obtained from the public mains | 1,088,140.3 | 1,384,831.4 | 1,355,908.8 |
| Obtained from other sources | 1,461,023.0 | 1,264,255.3 | 1,670,810.3 |
| Unfit for human consumption (obtained from purifiers, recycled water, etc.) | n.d. | n.d. | 1,125,737.0 |
| Total | 2,549,163.3 | 2,649,086.7 | 4,152,456.1 |

7.2.2. Material Consumption

CONSTRUCTION provisioning. Main items

| | 2011 | 2012 |
|---|-------------|-------------|
| Total wood purchased (t) | 18,579.0 | 10,473.0 |
| Certified wood (%) | 22.5% | 36.3% |
| Total steel purchased (t) | 248,683.0 | 635,987.1 |
| Steel manufactured with recycled materials (%) | 46.4% | 48.7% |
| Total cement / concrete purchased (t) | 2,991,658.0 | 4,945,677.8 |
| Cement / concrete which includes recycled aggregates (%) | 0.1% | 0.0% |
| Total aggregates purchased (t) | 7,890,311.0 | 6,809,315.4 |
| Recycled aggregates (%) | 23.7% | 0.8% |
| Total glass purchased (t) | 351.0 | 155.0 |
| Recycled glass (%) | 0.0% | 0.0% |
| Total pipes / insulation (generally PVC) purchased (t) | 706.0 | 1,082.0 |
| Recycled pipes / insulation (generally PVC) purchased (%) | 0.0% | 0.0% |
| Bitumen and asphalt (t) | 546,708.0 | 357,911.0 |
| Chemical products (€ million) | n.d. | 3,199.4 |

7.2.3. Waste Treatment

The main waste treatment methods for the Construction area's different companies are reclamation (including reuse, recycling and/or recovery) and incineration. The great majority of the remaining waste is sent to dumps. Construction wastes are analysed to separate out hazardous substances. This process results in part of the hazardous waste reported in this document, which in turn is reclaimed in accordance with the percentages reported.

Other treatment methods are not detailed as they are not considered material by the ACS Group.

| CONSTRUCTION wastes. Main items | 2012 | Reclaimed (%) | Incineration (%) |
|---|--------------|---------------|------------------|
| Surplus soil from excavation (t) | 16,650,447.6 | 63.9% | n.a. |
| Rubble (t) | 490,006.2 | 82.3% | n.a. |
| Wood (t) | 57,015.7 | 95.3% | 0.0% |
| Plastics (t) | 973.5 | 82.4% | 0.0% |
| Paper and Card (t) | 8,027.6 | 96.2% | 0.0% |
| Metals (t) | 218,061.6 | 100.0% | n.a. |
| Others (t) | 369,808.5 | 89.0% | 0.2% |

The remainder to total 100% is sent to dumps or other destinations.

7.2.4. Initiatives for Reducing Impacts on Biodiversity

- Annual targets are set for identifying sensitive areas and species and adopting prevention and protection measures.
- Protection plans are developed for native species.
- The possibility of incorporating or replacing polluting chemical products with other biodegradable products is being studied.
- Strict and rigorous compliance with environmental law.
- Carrying out of some activities with lightweight machinery.
- Activities for replanting and relocating species in similar habitats.

Impact on Biodiversity.

CONSTRUCTION

| | |
|---|-------|
| Implementation of objectives to minimise the company's impact on biodiversity | 40.7% |
| Companies with projects located in areas of high biological value; % of sales | 42.6% |
| Companies which have carried out specific restoration activities; % of sales | 40.7% |
| Number of species threatened by the activities of Construction companies | 19 |



7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.3. Environmental Services

Urbaser, the lead company in the ACS Group's Environmental Services area, applies strict environmental criteria and sets both corporate objectives and objectives by contract or project.

The main impacts on the environment generated by the ACS Group's Environmental Services area are related to emissions of greenhouse gases produced by waste transport vehicles and the

gases generated in the company's dumps and treatment plants themselves. Other significant impacts on the environment result from the lixiviates produced in the dumps and from the management of the wastes generated.

Level of implementation of good environmental practices in the ENVIRONMENTAL SERVICES area

| | |
|---|-------|
| Implementation of an environmental management system | 90.1% |
| Implementation of ISO 14001 certification | 85.3% |
| Implementation of formal objectives in environmental management matters | 90.1% |
| Implementation of specific targets for reducing CO ₂ emissions | 0.0% |
| Implementation of projects for reducing waste generation | 0.0% |
| Implementation of plans to reduce water consumption | 0.0% |
| Implementation of objectives to minimise the company's impact on biodiversity | 0.0% |

7.3.1. Emission of Greenhouse Gases³⁴

Greenhouse gas emissions. (tCO₂eqv.) ENVIRONMENTAL SERVICES

| | 2010 | 2011 | 2012 |
|---------|-------------|-------------|-------------|
| Scope 1 | 1,815,753.8 | 1,618,433.4 | 1,382,438.7 |
| Scope 2 | 76,916.9 | 81,856.9 | 28,546.9 |
| Scope 3 | 2,488.9 | 2,162.5 | 926.7 |

7.3.2. Total Waste Water Discharges

Total waste water discharges (m³) ENVIRONMENTAL SERVICES

| | 2010 | 2011 | 2012 |
|---|-------------|-------------|-------------|
| To the public network | 1,063,835.0 | 2,057,846.9 | 1,362,303.6 |
| Discharges to the sea or rivers/lakes | 6,605,013.0 | 55,153.0 | 47,402.0 |
| Waste water discharges to specific water receiving facilities | N/A | N/A | 939,962.3 |
| Total | 7,668,848.0 | 2,112,999.9 | 2,349,667.8 |

³⁴ In relation to Scope 1 emissions, 1,244,789 tonnes of these emissions were generated in waste treatment and waste water purification centres belonging to the Authorities and operated by Urbaser. Given that the company has no control over the design of these centres and, therefore, over the volume of the emissions associated with their operation, they need to be considered separately, although in this report, to maintain consistency with earlier years, they continue to be considered as Scope 1.

These emissions originate in processes associated with waste treatment (composting, biomethanisation, incineration and anaerobic decomposition in dumps) and waste water treatment (denitrification during purification). Methane emissions are not included in waste water treatment, as these are plants with aerobic treatment with an appropriate level of operation.





7. COMMITMENT TO THE NATURAL ENVIRONMENT

7.4. Industrial Services

Industrial Services' activity mainly affects the environment through the use of materials and the generation of wastes. In this respect, the concern of managers in the environmental management departments of each of the ACS Group companies is not only focused on reducing waste, but also the appropriate treatment and recycling of that inevitably produced.

Each company in the Industrial Services area develops its own plans to improve its energy efficiency and minimise its consumption of materials and its generation of wastes.

Level of implementation of good environmental practices in the INDUSTRIAL SERVICES area

| | |
|---|-------|
| Implementation of an environmental management system | 98.1% |
| Implementation of ISO 14001 certification | 71.5% |
| Implementation of formal objectives in environmental management matters | 98.1% |
| Implementation of specific targets for reducing CO ₂ emissions | 16.4% |
| Implementation of projects for reducing waste generation | 20.3% |
| Implementation of plans to reduce water consumption | 77.4% |
| Implementation of objectives to minimise the company's impact on biodiversity | 6.7% |



7.4.1. Material Consumption

INDUSTRIAL SERVICES' provisioning. Main items

| | 2011 | 2012 |
|---|-----------|----------|
| Total wood purchased (t) | 972.0 | 638.0 |
| Certified wood (%) | 0.0% | 9.3% |
| Total steel purchased (t) | 139,877.0 | 27,794.0 |
| Steel manufactured with recycled materials (%) | 0.0% | 0.1% |
| Total cement / concrete purchased (t) | 56,658.0 | 31,923.0 |
| Cement / concrete which includes recycled aggregates (%) | 0.0% | 0.0% |
| Total aggregates purchased (t) | 14,859.0 | 69,439.0 |
| Recycled aggregates (%) | 0.0% | 0.0% |
| Total glass purchased (t) | 1,057.0 | 4.0 |
| Recycled glass (%) | 0.0% | 0.0% |
| Total pipes / insulation (generally PVC) purchased (t) | 73.0 | 3,055.0 |
| Recycled pipes / insulation (generally PVC) purchased (%) | 0.0% | 0.2% |
| Cables (t) | 5,849.0 | 2,507.0 |
| Iron (t) | 4,313.0 | 3,960.0 |
| Gases (t) | 1,361.0 | 3,114.0 |
| Lights (t) | 563.0 | 418.0 |
| Bitumen and asphalt (t) | 776.0 | 380.0 |
| Aluminium (t) | 218.0 | 320.0 |
| Copper (t) | 857.0 | 839.0 |
| Electronic and electrical items (t) | 376.0 | 270.0 |
| Plastics (t) | 24.0 | 11.0 |

7.4.2. Generation of waste

INDUSTRIAL SERVICES' wastes.

| Main items | 2012 | Reclaimed (%) | Incineration (%) |
|----------------------|----------|---------------|------------------|
| Paper and Card (t) | 706.9 | 84.3% | 0.1% |
| Wood (t) | 4,047.1 | 80.8% | 0.0% |
| Electronic Waste (t) | 2,168.7 | 99.7% | n.a. |
| Scrap (t) | 3,254.2 | 79.5% | 17.7% |
| Urban Waste (t) | 5,071.3 | 19.5% | 0.0% |
| Others (t) | 53,217.4 | 67.8% | 0.0% |
| Total (t) | 68,465.5 | 66.8% | 0.8% |

The remainder to total 100% is sent to dumps or other destinations.



8. COMMITMENT TO THE SOCIAL SETTING

8.1. The ACS Group's People

2012 Milestones

DRAGADOS

Carrying out of custom training actions on line, adapting the contents to the sector and the company's real needs.

Training, development and culture programme for the sector and company to unify HR procedures internationally.

Inclusion of new training actions in skills aimed at tackling the changes which have occurred in the social and employment environment and in the sector.

Dissemination of a culture of values and behaviours in equal opportunities, training plan and harassment protocol through training in the Equality Law for all the company's workers.



Action plan for local offices in Cobra's international business.



Installation of a human resources database which is currently used in all HR departments. Hiring of 278 people.



Focusing on developing talented employees.



Development of programmes to promote employee satisfaction.

Development of programmes to improve training for middle managers.

Development of policies for retaining talent.



Actions for implementation and for training employees on Leighton's Code of Conduct.



Promotion of collaboration with the Integra Foundation for work placement of workers at risk of social exclusion, which managed to pass 500 hires of people from this group included in the workforces since collaboration began, which has been recognised by the Foundation.



Giving specific training on-line on railways through the training action: "Railways course. Superstructure Planning and Construction".

Collaboration with the IAESTE Organisation: Call for scholars (countries of origin: Poland and the USA).



Adaptation of workforces to new working systems and production levels.

Preparation of a talent map for the Local Offices group.

Specific Training Plan for the Works Managers group.



Implementation of a balanced scorecard based on management of indicators relating to HR management, both domestically and internationally.

Challenges for 2013



Reduction of labour costs.

Increasing the perception in the market as an "attractive employer".

Recruitment of specialised personnel: Works managers, specialists, middle managers.

Implementation of measures related to the "People Index 2012" campaign.

DRAGADOS

Integrating, homogenising and standardising common procedures in the domestic and international HR field.



Improving working conditions for employees in terms of work post location and mobility.



Improvement to operational management of employees, reduction of labour cost and increasing the talent retention ratio.



Improving employee capabilities in terms of: Professionalism, diversity and inclusion, health and safety, leadership, performance and remuneration. Increasing training actions for implementation of the Code of Conduc.



Implementing and automating the performance assessment process for all Technical/Administrative personnel.

DRAGADOS USA

Inclusion of retirement programmes and continuous reviewing of the risk prevention plan in all companies. Hiring and development of talent in the organisation. Relocating existing talent in other projects. Continuing to build a positive image of the company through recruitment in universities. Gaining the involvement of managers and employees in the new Taleo management systems (Time & Attendance module).



Continuing with efforts to maintain the percentage hires of women as laid down by the OFCCP, as well as federal contractors and to reach DBE targets.



Implementation of a Flexible Remuneration Plan.

Preparation of profiles by job post.

Implementation of a training database available to all authorised personnel.

Abiding by the principles of the UN Global Compact for the empowerment of women.



Working environment survey and development of an equality plan.

THE CAPACITY OF ACS'S HUMAN CAPITAL IS KEY FOR ITS SUCCESS. THAT IS WHY THE COMPANY PROMOTES THE PROFESSIONAL DEVELOPMENT OF ITS EMPLOYEES AND GUARANTEES EQUALITY OF OPPORTUNITIES AND TREATMENT

8.1.1. Strategic Priorities

The ACS Group's business success comes from its team. Hence the company maintains its commitment to continuously improving their skills, capabilities and level of responsibility and motivation, at the same time as it attends to working and safety conditions with the greatest dedication.

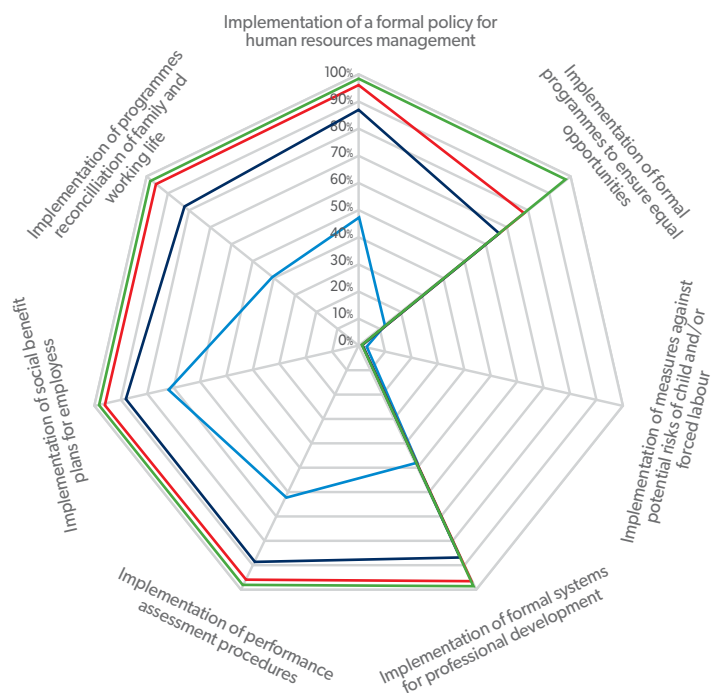
The ACS Group applies modern and efficient human resource management tools with the objective of retaining the best professionals. Companies representing 80.8% of the ACS Group's employees state that they set formal objectives for Human Resource management. Some of the fundamental principles governing the companies' corporate human resources policies are based on the following common actions:

- Attracting, retaining and motivating talented individuals.
- Promoting teamwork and quality control as tools to drive excellence as work well do.
- Acting quickly, promoting the assumption of responsibilities and minimising bureaucracy.
- Supporting and increasing training and learning.
- Innovating to improve processes, products and services.

The ACS Group is an active defender of the human and labour rights recognised by various international organisations. The company promotes, respects and protects the forming of labour unions and employees' rights to freedom of association and guarantees equal opportunities and treatment, without discriminating on the basis of sex, ideology, religion or any other social or individual circumstance or condition.

Likewise, the Group promotes the professional development of its workers. With this aim, it has an employment policy which generates wealth in the zones where it operates and produces links which create positive synergies for the environment. Furthermore, it shows special interest in ensuring dignified working conditions, subject to the most advanced measures for health and safety at work. It promotes management by competences, performance assessment and management of the professional careers of its workers.

STRATEGIC PRIORITIES



- ACS GROUP
- CONSTRUCTION
- INDUSTRIAL SERVICES
- ENVIRONMENT

Level of implementation as reported by ACS Group companies and according to the number of employees in each of them.

³⁵ The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by number of employees. The data is expressed in terms of percentage of total Group employees at 31 December 2012.

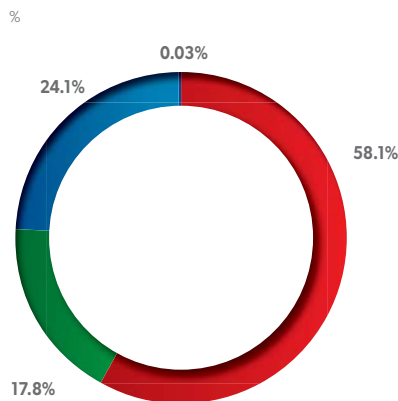
8. COMMITMENT TO THE SOCIAL SETTING

8.1.2. Main Figures

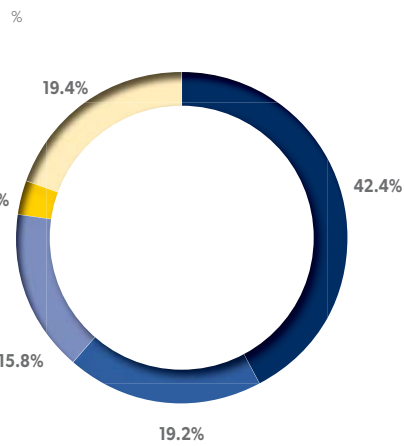
The ACS Group employs a total of 162,471 people, of whom 49,967 work in Spain and 112,504 abroad. Of all the employees, 53,217 people are of a different nationality to that of their company's

head office. The ACS Group has employees in more than 54 countries, in which it promotes its workers' economic and social development.

PERSONNEL BY AREA OF ACTIVITY



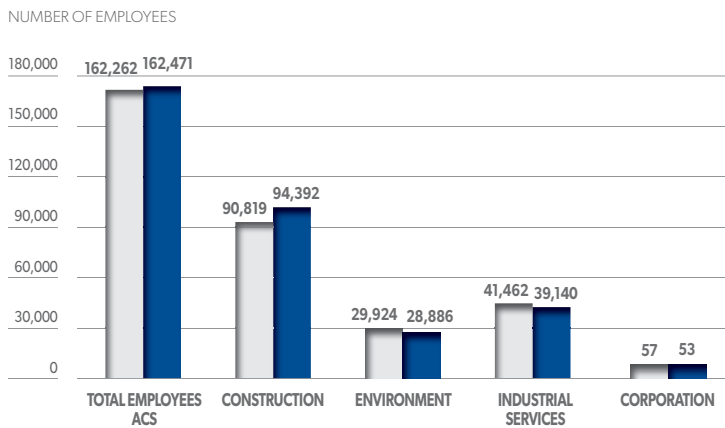
PERSONNEL BY GEOGRAPHICAL AREA



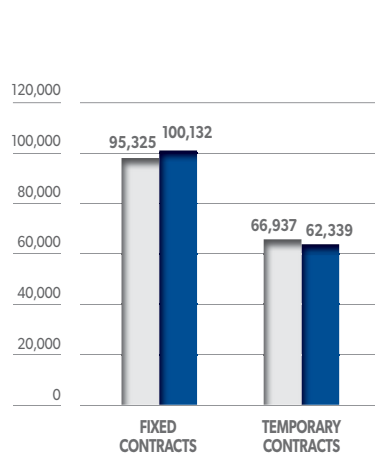
- CONSTRUCTION
- ENVIRONMENT
- INDUSTRIAL SERVICES
- CORPORATION

- EUROPE
- AMERICA
- ASIA
- AFRICA
- OCEANIA

NUMBER OF EMPLOYEES BY LINE OF BUSINESS



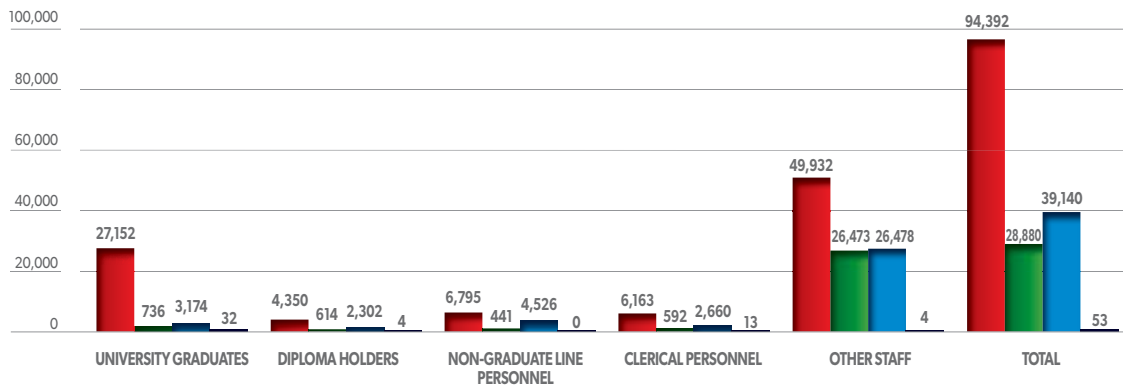
TYPES OF CONTRACT



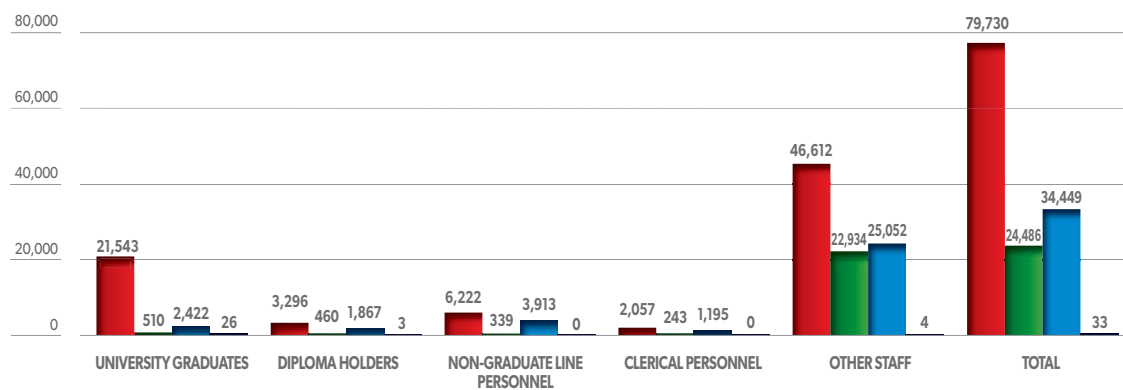
- 2012
- 2011

- 2012
- 2011

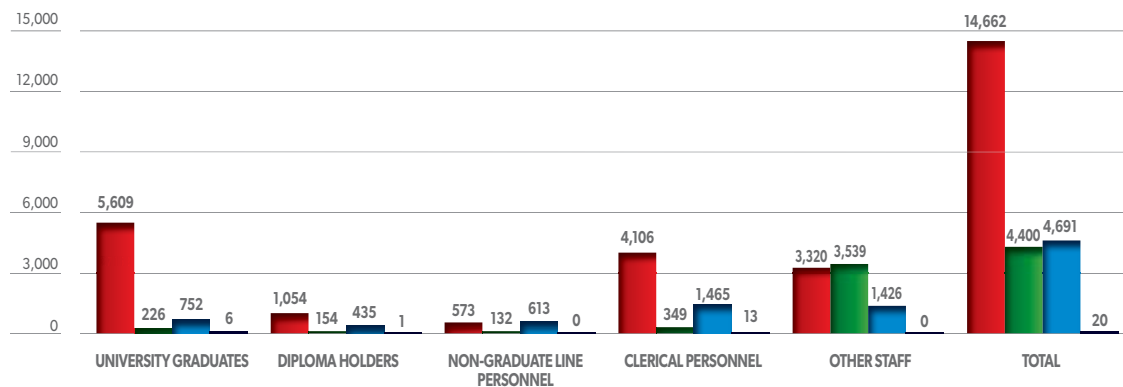
PERSONNEL BY PROFESSIONAL CATEGORY AND AREA OF ACTIVITY



MEN BY PROFESSIONAL CATEGORY AND AREA OF ACTIVITY



WOMEN BY PROFESSIONAL CATEGORY AND AREA OF ACTIVITY



8. COMMITMENT TO THE SOCIAL SETTING

8.1.3. Sustainable Management of the ACS Group's People

8.1.3.1. Equality, Diversity, Integration, Rights

Equality of opportunity, lack of discrimination and respect for human rights, which are basic principles included in the Group's Code of Conduct, are also determining factors when advancing the professional and personal development of all the ACS Group's employees.

The ACS Group rejects any type of discrimination, in particular that due to age, sex, religion, race, sexual orientation, nationality or disability. This commitment extends to selection and promotion processes, which are based on assessment of the person's capabilities, on the analysis of the requirements of the job post and on individual performance.

Currently, companies representing 66.6% of ACS Group employees have formal programmes to ensure equality of opportunities. These Equality Plans have adopted specific actions in companies representing 79.1% of ACS's employees, as regards selection and hiring of personnel, salary, training, working days, professional promotion, assistance, bonuses and social, health and occupational risk prevention policies, as well as in matters of gender violence.

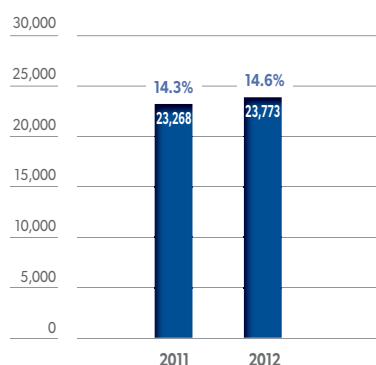
Good practices in sustainable HR management.

(SCOPE EXPRESSED IN PERCENTAGE OF ACS GROUP EMPLOYEES)

2012

| | |
|--|-------|
| Formal commitment to the Universal Declaration of Human Rights | 81.3% |
| Formal commitment to the OECD guidelines for multinational enterprises | 76.0% |
| Implementation of formal programmes to ensure equal opportunities | 66.6% |
| Potential risks of child and/or forced labour | 0.8% |
| Potential threats to rights of association | 0.1% |

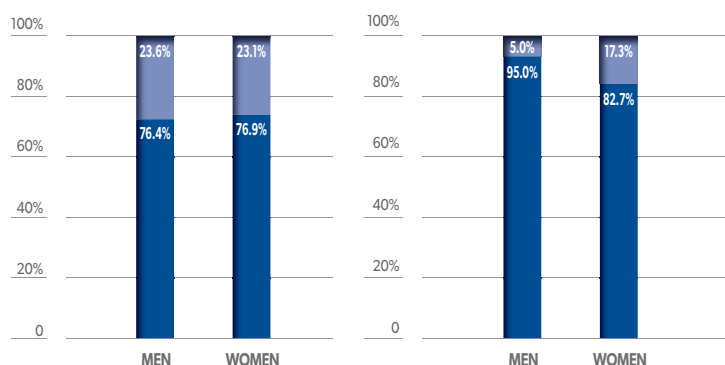
NUMBER OF WOMEN IN THE ACS GROUP



■ WOMEN
■ % OF TOTAL WORKFORCE

TYPES OF CONTRACT BY GENDER

%



■ OPEN-ENDED CONTRACT
■ PARTIAL CONTRACT
■ FULL TIME WORKING
■ PART TIME WORKING

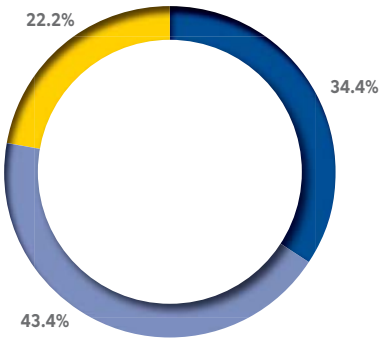
The ACS Group also promotes the hiring of people with disabilities and offers them a working environment which enables them to develop under conditions of equality. In this regard, 1,362 disabled people were working in the ACS Group at 31 December 2012.

The ACS Group also understands the relevance that having local roots and being sensitive to each place's particular nature has in the company's success. For that reason, it promotes direct

hiring of local employees and managers. The number of executives from the local community totalled 1,169 in 2012.

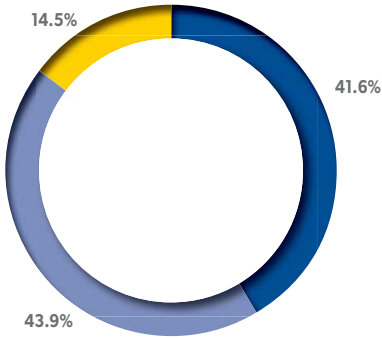
Through the channels available to the company, three incidents related to discrimination were reported, of which two were rejected in court and the other is in progress.

PERSONNEL BY AGE - MEN



- 35 OR UNDER
- BETWEEN 36 AND 50
- 51 OR OVER

PERSONNEL BY AGE - WOMEN



- 35 OR UNDER
- BETWEEN 36 AND 50
- 51 OR OVER



8. COMMITMENT TO THE SOCIAL SETTING

8.1.3.2. Labour Relations

All the ACS Group's employees, including expatriate Spanish workers, are subject to the collective agreements in force applicable to the sector in which they work, as well as the regulations relating to management personnel and, in all cases, the labour legislation in the countries where they work. For example, collective agreements on matters of notice period(s) regarding organisational changes are rigorously respected.

In the field of labour relations, the ACS Group considers dialogue to be an essential element. For this reason, it holds regular meetings with union representatives for all its companies. Of Group employees, 21.0% are members of trade unions or union organisations.

Furthermore, only in companies representing 0.1% of ACS Group employees were activities detected in countries where rights of association and union representation are threatened, it being ACS Group policy to promote good labour practices and respect for the legislation in force.

8.1.3.3. Turnover and Absenteeism Rate

According to that reported in 2012, average employee turnover rate in the ACS Group was 15.1%, at 15.7% for men and 14.8% for women.

The absenteeism rate³⁶ for Group employees in 2012 was 8,223.

³⁶ Absenteeism rate: Total number of days lost (due to absence) during the period over the total number of days worked by the group of workers during the same period, times 200,000.

8.1.4. Employee Remuneration and Benefits

8.1.4.1. Services for Employees

Companies representing 90.3% of ACS Group employees offer their employees social benefits of a variety of natures. Worthy of note among these services, going under various names, with differing content and scope of application, are the following:

- Life and accident, travel and health insurance.
- Salary advances.
- Annual medical checks and medical care.
- Assistance for those with children with disabilities.
- Help with schooling for children and workers taking courses in official centres.
- Economic assistance for food or company canteens.
- Company bus service.
- Company Welfare programmes.
- Agreements with banks.
- Commercial discounts in affiliated establishments.
- Cultural and social activities.

With respect to retirement plans, companies representing 72.1% of employees reported the existence of retirement plans. The rest of the companies located in Spain rely on the public pension systems. In addition, some of them promote partial retirement.

Some companies located outside Spain, such as Schiavone, Pulice, Picone and HOCHTIEF in Europe, offer retirement plans to their employees.

HOCHTIEF AMERICAS



The companies belonging to the HOCHTIEF Americas division are attractive and popular employers in the USA and Canada, as indicated by numerous studies conducted among various stakeholder groups.

Turner was ranked among the top 100 most popular US employers in the reporting period in the "Ideal Employer" study conducted by Universum Communications. The study surveyed more than 60,000 students nearing graduation.

Turner was also recognized in the area of diversity in 2012. For the fourth year in a row, business owners named the HOCHTIEF subsidiary one of the top 50 organizations for multicultural business opportunities.

According to a survey, employees at Turner have a strong sense of loyalty to the company, and gave high favorability ratings for a range of topics including career development and benefit programs.

In 2012, Flatiron was voted one of the 50 best large employers in the country by the "Great Place to Work Institute Canada." The ranking was based on a survey of Flatiron's own employees and included some 60 factors as well as a detailed examination of corporate culture, personnel policy, and human resources operations. Eighty-two percent of employees said Flatiron was a "great place to work." A total of 49,000 employees from more than 230 companies in Canada took part in the study.



8. COMMITMENT TO THE SOCIAL SETTING

8.1.4.2. Flexibility and Reconciliation

Companies representing 84.5% of Group employees have programmes promoting balance between family life and work available to them.

The following are noteworthy among the different initiatives applied by ACS Group companies to promote balance between family life and work:

- Flexible working time: the workforce can take up the offer of flexible working time schemes, with a margin of one hour, to accommodate their periods for entering or leaving work to their personal needs.
- Reduction of the working day: there are people in ACS who have a working day without a break or who have a reduced day.
- Accumulation of breast-feeding periods.
- Time off or part-time working for fathers and mothers after childbirth.
- Change of work centre due to change of residence.
- Management of shift changes between workers in services.

8.1.4.3. Remuneration

The remuneration model of ACS Group companies includes numerous specific details and characteristics which, in many cases, even convey competitive and operational advantages in sectors such as engineering and works management.

From among these disparate remuneration systems, in the section on commitment to people it is important to analyse whether the use of variable remuneration is common and what the main factors are which influence such remuneration, especially whether these factors are related to sustainability.

In 2012, companies representing 90.4% of Group employees reported the existence of variable remuneration in their payment plans. These remunerations are calculated in all cases based on operational and economic factors. A small part of the remuneration also depends on targets set as regards sustainability (four Group companies, representing 47.4% of its employees, state that they include sustainability targets in the calculation of variable remuneration).

8.1.5. Professional Development

Companies representing 84.7% of ACS Group employees offer their employees some form of professional development system.

8.1.5.1. Competences

Each ACS Group company manages its professionals' development independently, adapting this to its needs and the specific nature of its activities. Companies representing 75.5% of ACS Group employees adopt competence management models to improve personal knowledge and skills and use training as a tool to achieve ideal performance of the work.

Competence maps, prepared in ACS Group companies, are aligned with the strategy and particular features of each one. These maps, which are reviewed regularly, define the basic and specific competences of each work post which are essential for its effective performance.

8.1.5.2. Assessment and Development

The performance assessment models in ACS companies are based on the competences and parameters for each work post, as described in the management systems.

Although the companies manage the professional development of their workforces independently, they all share some common elements, namely:

- They allow the worker to talk about their job situation, express their interests and motivations, both personal and professional, their geographic flexibility, their training interests and their idea of their professional future in the company.
- They enable the company to show a receptive attitude to the information obtained from its workers, in order to be able to deal with their concerns, as far as possible, by implementing corrective actions.
- They allow decision making to be accelerated when selecting appropriate personnel for specific posts, as well as in determining professional promotion or increasing worker employability.
- They enable fair and equitable metrics to be established for setting variable remuneration.

These methodologies are consolidated and functioning fully in various ACS Group companies. In fact, companies representing 87.4% of Group employees reported their use. Of these, the number of employees involved in performance assessment processes was 63,482 in 2012, reaching 39.1% of the total workforce.

One of the most significant employee motivation and satisfaction initiatives is the possibility of promotion. The turnover of the ACS Group and its continuous growth generate a significant number of annual promotions among employees who, due to their efforts and effectiveness, are nominated for positions of greater responsibility. A total of 1,503 employees were promoted in 2012.

8.1.5.3. Employee Satisfaction

Companies representing 76.0% of Group workers stated that they have formal processes for measuring employee satisfaction. Of these, those which had carried out satisfaction surveys in 2012 reported that, on average, 77.2% of employees responded that they were "satisfied" or "very satisfied"³⁷.

Additionally, other types of tools have been used to assess this aspect:

- Exit interviews carried out when employees leave voluntarily. Frequent in many ACS companies, their aim is to go into the reasons for the worker leaving the company in greater depth and into those aspects they would highlight as negative and as positive.
- Regular interviews with the employee's supervisor, enabling the employee's situation to be known.
- Suggestions box. Collecting workers' ideas, initiatives and complaints.

³⁷ Surveys were carried out in 2012 in companies representing 82.0% of ACS Group employees.



8. COMMITMENT TO THE SOCIAL SETTING

8.1.6. Training Plans

The ACS Group has programmes for continuous training and skills development, aimed at covering the employees' training wants and needs, as identified during the year and in line with the competences established in the management models. The aim of the training

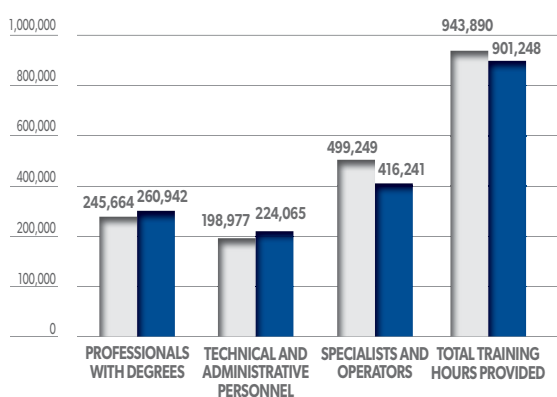
plans is to meet the employees' training needs for correct execution of their work and for their personal and professional development.

The training plans for the different companies are updated regularly to adapt them to the needs of each business and, in the end, of each person. Companies representing 84.7% of Group employees report the existence of tools for managing development of human resources such as training platforms, on-line training (77.8% of courses given were non-attendance) or even agreements with training centres. Indeed, tools are available which are adapted to the different competence profiles to analyse training needs. Specifically, in ACS Group companies, courses are given in areas related to the following aspects, among others:

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

TRAINING GIVEN BY PROFESSIONAL CATEGORY

Hours



■ 2012
■ 2011

Average number of training hours by professional category (*)

| | 2010 | 2011 | 2012 |
|--|-------|------|-------|
| Management, professionals with degrees | 17.38 | 6.71 | 6.80 |
| Technical and administrative personnel | 6.00 | 7.02 | 10.56 |
| Specialists and operators | 4.2 | 5.1 | 4.0 |

(*) Average number of training hours = (Total hours of training per professional category) / (Total employees per professional category)

Participants in training courses

| | 2010 | 2011 | 2012 |
|------------------------|--------|--------|--------|
| Number of participants | 72,152 | 55,613 | 63,450 |

Investment in training

| | 2010 | 2011 | 2012 |
|------------------------------------|-------|--------|--------|
| Investment in training (€ million) | 11.50 | 18.61 | 26.55 |
| Training per employee (€/employee) | 87.66 | 114.57 | 163.43 |

8.2. Safety in the Workplace in the ACS Group

2012 Milestones

DRAGADOS

Reduction in the serious accident rate by 56.4% in the company's own workers. Reduction of the serious/fatal accident rate in subcontractor company employees by 47.37%.

Zero fatal accidents among own and subcontracted personnel.

Implementation of the 2012 "Distraction is a risk" campaign (focused on carrying out the necessary actions to prevent distractions as a psycho-social risk).

First Asepeyo Prize for "Best Risk Prevention Practices" in the field of "Best prevention action for risk control" for the action: "Innovations in the design of tunnelling machines for cutting wheel maintenance work".



Attainment of good results in terms of accident indices, with 80.1% of local offices with zero accidents.



Carrying out of numerous occupational risk prevention programmes, above all in countries such as Venezuela, Mexico, Chile, Argentina and Morocco.



Extension of OSHAS18001 certification coverage.



OSHAS18001 certification and achievement of highly satisfactory results in Health and Safety terms, with a greatly reduced number of incidents.



Integration of Health and Safety and sustainable construction policies into the company's policies.



Carrying out of various initiatives in the company, noteworthy among which are the inclusion of factors related to health and safety in executives' remuneration, increasing the number of management indicators in the balanced scorecard for health and safety and the increase in the information provided to managers and the Board of Directors.

DRAGADOS POLAND

Carrying out of actions to increase health and safety in works by promoting training, safe access systems, coordination in safety management and defining processes in Dragados Poland.



Continuation of the information campaign on prevention of musculo-skeletal disorders in works and offices and improvement of functions and identification of Risk Prevention Resources for works.

Challenges for 2013



Plan for risk prevention service standardisation in the international area.

Plan for integration of Occupational Risk Prevention at all hierarchical levels through field safety inspections.

Special campaign for prevention of electrical accidents: "5 golden rules".

DRAGADOS

2013 campaign "This is your equipment too, protect it".

Definition and Preparation of a Global Policy and Guide in Health and Safety; and Implementation of improvements in risk prevention systems in the international area.



Carrying out of a general inspection of equipment in treatment plants in Spain.



Development of policies which promote an occupational risk prevention-oriented culture.

DRAGADOS USA

Carrying out of specific actions in relation to machinery safety, especially cranes, noteworthy among which are audits carried out throughout the year.



Completing the OSHAS18001 certification processes in several companies, with Vias (International), Dragados Canada, Schiavone and Picone being worthy of note in the construction area.



Review of the whole Risk Prevention Management System and its specific procedures by integrating them with the Quality and Environment Management System.

Certification of Safety Management Systems in Spain, Mexico and Brazil.

Development of a management control application.



Maintenance of indicators of unsafe conditions/acts reported associated with particularly hazardous activities at below 15% of the total: Work at Height and Use of Equipment and Tools.

8. COMMITMENT TO THE SOCIAL SETTING

8.2.1. Strategic Priorities

The prevention of occupational risks³⁸ is one of the strategic pillars of all ACS Group companies. Each of these companies and the Group in general maintain the commitment to reach the most demanding standards in this area and so become a reference in health and safety protection, not only for its own employees, but also for its suppliers, contractors and collaborating companies.

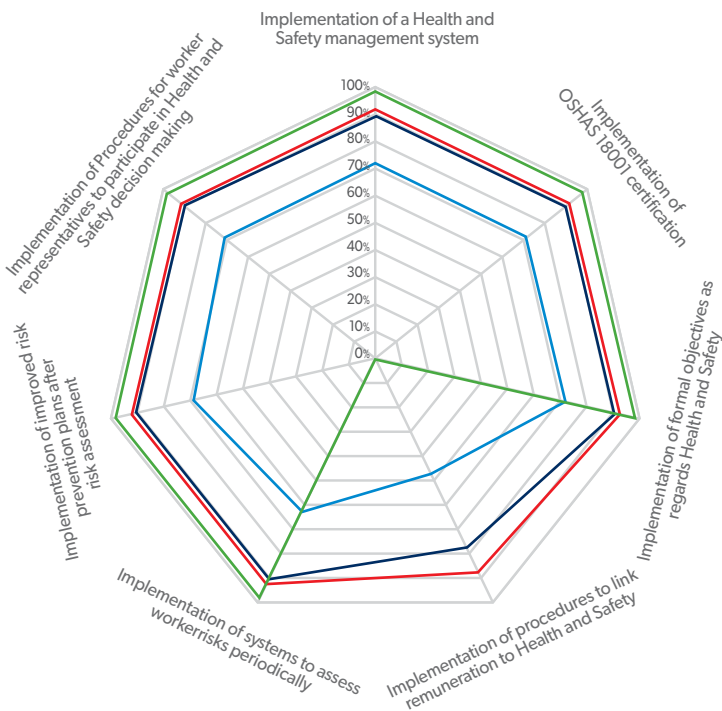
The main challenge lies in designing and implementing, in all its operating fields, a risk prevention service which meets expectations. Furthermore, the company considers it fundamental to reinforce its commitment to a risk prevention culture and to optimising resources.

Thanks to the individual commitment of all its employees and the involvement of suppliers, contractors and collaborating companies, the ACS Group continues to advance in building the desired risk prevention culture, approaching its ultimate objective of achieving an accident rate of zero.

³⁸ The data referring to the ACS Group included in this section were calculated by analysing the information supplied by the Group's different companies, weighted by number of employees. The data is expressed in terms of percentage of total Group employees at 31 December 2012.

The concepts of occupational risk prevention and health and safety at work are used indistinctly.

STRATEGIC PRIORITIES OF ACS GROUP COMPANIES



- ACS GROUP
- CONSTRUCTION
- INDUSTRIAL SERVICES
- ENVIRONMENT

Level of implementation as reported by ACS Group companies and according to the number of employees in each of them.

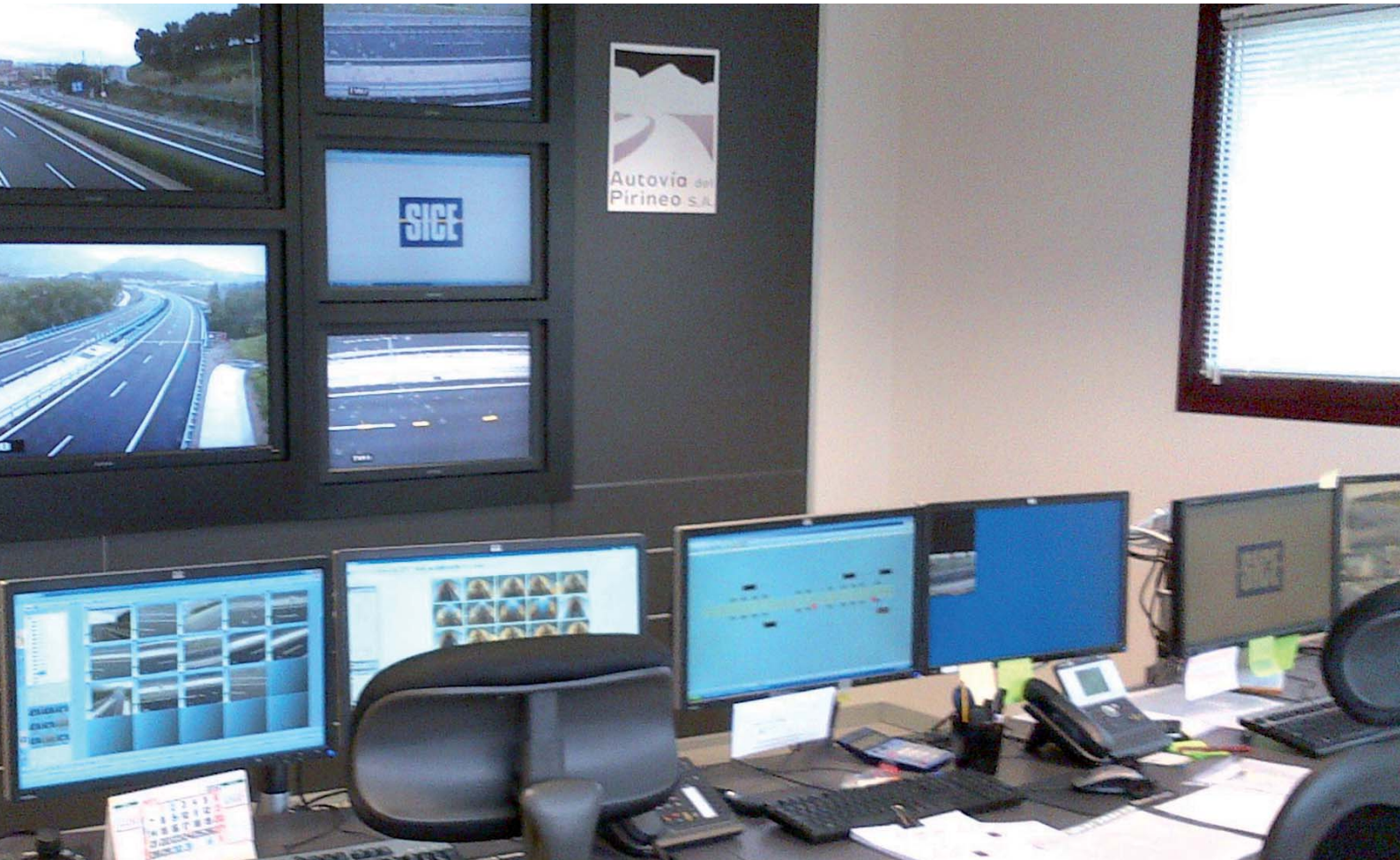


8.2.2. Management Model

The ACS Group's risk prevention policy complies with the various Occupational Health and Safety regulations which govern the area in the countries where it is operates, at the same time as promoting integration of occupational risks into the company strategy by means of advanced practices, training and information.

Despite the fact that they operate independently, the great majority of the Group's companies share common principles in the management of their employees' health and safety. These principles are the following:

- Compliance with current legislation on occupational risk prevention and other requirements voluntarily observed.
- Integration of occupational risk prevention into the set of initiatives and at all levels, implemented through correct planning and its putting into practice.
- Adoption of all those measures necessary to ensure employees' protection and well-being.
- Achieving continuous improvement of the system by means of appropriate training and information as regards risk prevention.
- Qualification of staff and application of technological innovations.



8. COMMITMENT TO THE SOCIAL SETTING

8.2.2.1. Systems

Group companies representing 88.9% of its employees report that they have a health and safety system which deals with the implementation of the policy and of the action plans developed in accordance with the priorities identified. In general, all ACS Group companies share a series of characteristics in risk prevention management:

- Implementation of systems for management of health and safety risk prevention, developed according to the OHSAS 18001 reference standard. This policy was reported by companies representing 88.9% of Group employees.
- The existence of internally and/or externally audited systems (81.1% of Group employees).
- Definition of objectives and planning of preventive actions in the framework of the policy and particular nature of each company, an aspect which affects 88.9% of the Group's employees.
- There are systems for regular assessment of the risks to which workers are exposed in companies representing 88.9% of ACS Group employees.
- Risk prevention plans are defined which take in the improvements detected in these assessment procedures (88.1% of Group employees).
- Systems which could have resulted in an incident are identified and recorded (analysis of near misses) in companies representing 86.9% of ACS's employees.
- Workers' and managers' remuneration are referenced to fulfilment of formal targets as regards health and safety in 75.0% of the ACS Group.
- There are integrated computerised systems in companies representing 72.8% of Group employees, which are used to monitor data related to employee and subcontractor health and safety.

8.2.2.2. Health and Safety Policies

In line with the risk prevention policy, and within these Group companies' management systems, these are the main common characteristics:

The supervision and optimisation of these systems involves setting and monitoring objectives, which are generally annual, approved by senior management and transferred to the company's various levels to be fulfilled.



8.2.2.3. Investment

INVESTMENT AND COSTS FOR HEALTH AND SAFETY IN THE WORKPLACE

| MILLION EURO | 2010 | 2011 | 2012 |
|---------------------|------|------|------|
| Construction | 11.2 | 8.3 | 21.6 |
| Environment | 5.8 | 6.1 | 5.1 |
| Industrial Services | 17.4 | 12.2 | 12.5 |
| Total | 34.4 | 26.6 | 39.2 |

INVESTMENT AND COSTS PER EMPLOYEE FOR HEALTH AND SAFETY IN THE WORKPLACE

| EURO PER EMPLOYEE | 2010 | 2011 | 2012 |
|---------------------|-------|-------|-------|
| Construction | 621.5 | 522.0 | 732.6 |
| Environment | 72.5 | 210.8 | 176.4 |
| Industrial Services | 416.8 | 311.4 | 319.5 |
| Total | 244.0 | 163.7 | 241.7 |

8.2.2.4. Risk Prevention Plans

The Risk Prevention Plans prepared in the Group companies include the conclusions from the regular risk assessments and guidelines for action are laid down for achieving the objectives set. Likewise, in many of the Group's companies, specific assessments are carried out for activities and centres, leading to Specific Risk Prevention Plans.

Along these lines, certain groups of workers, who, due to their occupation, are at high risk of contracting specific diseases, are given special consideration.

EMPLOYEES WITH OCCUPATIONS WITH RISKS OF CONTRACTING SPECIFIC DISEASES

| NUMBER OF EMPLOYEES | 2010 | 2011 | 2012 |
|---------------------|-------|-------|-------|
| Construction | 60 | 558 | 358 |
| Environment | 1,568 | 1,789 | 1,921 |
| Industrial Services | 816 | 666 | 839 |
| Total | 2,444 | 3,013 | 3,118 |



8. COMMITMENT TO THE SOCIAL SETTING



8.2.2.5. Participation of Workers' Representatives

The consolidation of a risk prevention culture in the Group requires the participation of all the employees and, especially, of the workers' representatives, given that they are the communication channel between the workers and the company management. Representatives of 88.9% of the Group's workers take decisions in the health and safety field.

In Spain, this participation takes place, basically, through risk prevention representatives and, where applicable, the occupational risk prevention committees. Companies or work centres with 50 workers or more have a Health and Safety Committee set up. These Committees are the peer and professional body for participation dedicated to regular and periodic consultation on company actions as regards risk prevention.

The committees are made up of risk prevention representatives, on the one hand and, on the other hand by the employer and/or his or her representatives in an equal number to the prevention representatives. These committees hold quarterly meetings, for which minutes are taken on the matters discussed and the decisions taken. These minutes must be written within the period of one month after the meeting and be presented to the parties for their consultation and comments.

8.2.2.6. Training and Information

Training and information are fundamental to the development of the ACS Group's risk prevention policy and are the most effective medium for sensitising the company's people to health and safety. Companies representing 88.9% of ACS Group workers offer safety training.

NUMBER OF HOURS TRAINING GIVEN AS REGARDS HEALTH AND SAFETY

| NUMBER OF HOURS | 2011 | 2012 |
|---------------------|---------|---------|
| Construction | 202,392 | 221,934 |
| Environment | 153,433 | 203,502 |
| Industrial Services | 277,001 | 206,166 |
| Total | 632,826 | 631,602 |

8.2.2.7. Other Initiatives Related to Health and Safety

Several common characteristics which are worthy of highlighting were found in the study of the Group's different companies:

- Companies representing 89.7% of the workers have developed measures to guarantee the safety of third parties when they visit the companies' facilities.
- It should be highlighted that, as a general guideline and for companies which contract safety personnel, it is the contracted company which is responsible for providing the corresponding training to ensure the appropriate actions of its employees. In some cases, this training includes specific content

on human rights. If any Group company contracts a company which does not meet this requirement, the inclusion is suggested of this human rights training in the recycling courses they carry out with their personnel periodically.

- Companies representing 87.5% of the workers offer programmes and benefits related to health to their employees.

The ACS Group collaborates with organisations specialised in matters of health, safety and risk prevention and actively participates in the main conferences, congresses and forums organised domestically and internationally. This is a way of offering its experience and updating itself on the latest trends and best practices.

The main organisations of which ACS Group companies are part, either as members of their health and safety commissions or committees or by participating through some kind of collaboration are:

| COUNTRY | ORGANISATION |
|---------|--|
| SPA | CNC |
| SPA | AESPLA |
| SPA | SEOPAN |
| CAN | Infrastructure Health & Safety Association |
| US | Associated General Contractors |
| US | ASSE |
| US | National Safety Council |
| US | General Contractor Association |
| US | NY Safety Committee |
| UK | NISO |
| POR | IEFP |
| SPA | Fundacion Laboral de la Construcción |
| SPA | PESI |
| POL | Polish Labour Inspectorate |
| US | Construction Users Roundtable |
| US | American National Standards Committee |
| EU | ENCORD |
| AUS | Australian Constructors Association |
| AUS | Safety Institute of Australia |
| AUS | National Safety Council of Australia |
| AUS | Federal Safety Commission Accreditation |



8. COMMITMENT TO THE SOCIAL SETTING

8.2.3. Accident Rate

The ACS Group carries out detailed measurement of the main accident rate indices.

Faithful to its commitment to achieve its final objective of an accident rate of zero, ACS will continue to prepare specific plans for activities with the greatest risk and worst accident rates, which consider improvement actions in the management of this area, not only internally, but also among its business partners.

8.2.3.1. Employee Accident Rate Indices³⁹

³⁹ The information from Leighton is not included in the Frequency or Absenteeism rates in 2011 or 2012.

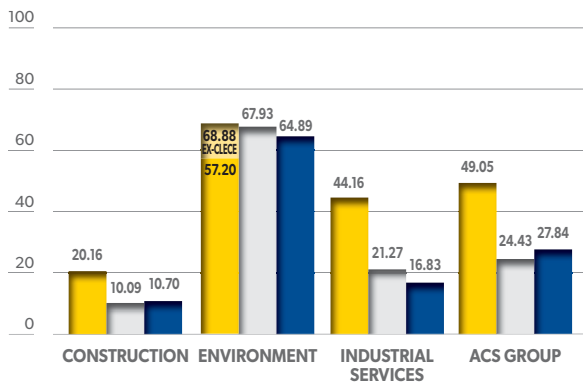
The indices for Environment in 2011 have been recalculated to make them homogeneous with the rest of the areas of activity, which only include in the calculations those accidents which involve the person involved in the accident being off work.

In the graphs for this section, data is included in Environment for Clece for 2010, but not for 2011 or 2012, as the company was consolidated as an asset prepared for sale. If Clece is discounted for 2010, the Environment accident rate indices would be:

Frequency rate: 2010 = 68.88
 Severity rate: 2010 = 1.87
 Incident rate: 2010 = 98.67
 TEP: 2010 = 0.05

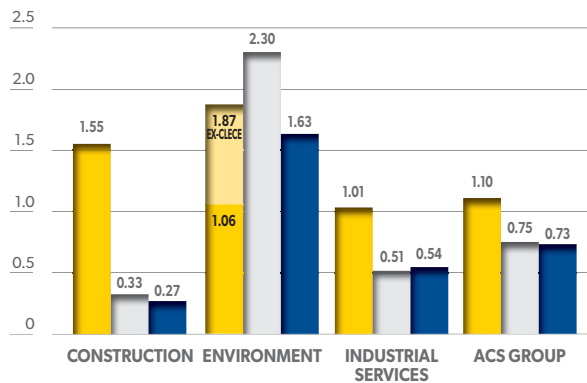
FREQUENCY RATE

NUMBER OF ACCIDENTS THAT OCCURRED DURING THE WORKING DAY FOR EVERY MILLION HOURS WORKED



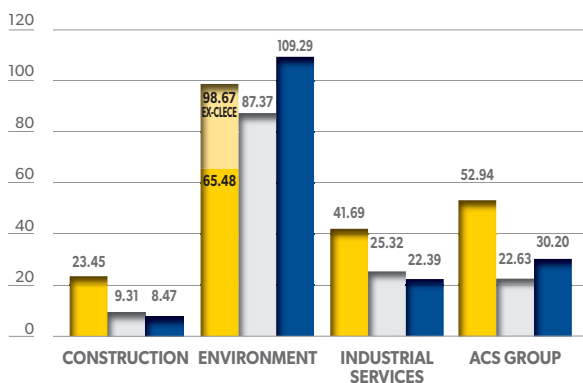
SEVERITY RATE

NUMBER OF WORKING DAYS LOST DUE TO ACCIDENTS PER THOUSAND HOUR WORKED



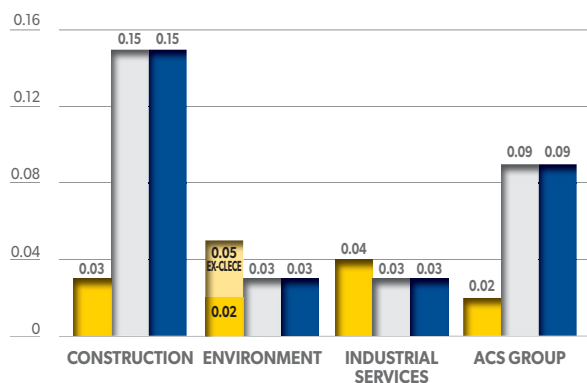
INCIDENT RATE

NUMBER OF ACCIDENTS WITH SICK LEAVE PER THOUSAND WORKERS



PROFESSIONAL DISEASE RATE

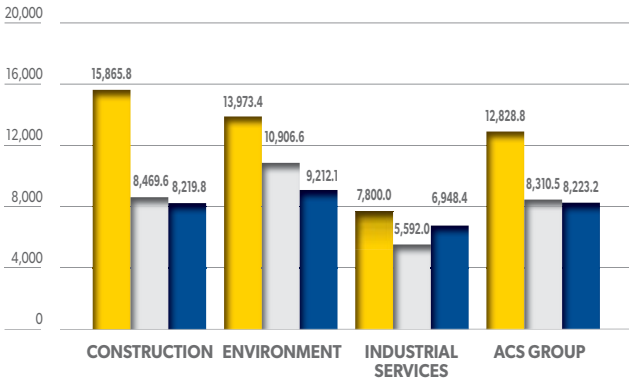
TOTAL NUMBER OF CASES OF OCCUPATIONAL DISEASES OVER THE TOTAL HOURS WORKED TIMES 200,000



■ 2012
 ■ 2011
 ■ 2010

ABSENTEEISM RATE

TOTAL NUMBER OF DAYS LOST (DUE TO ABSENCE) DURING THE PERIOD OVER THE TOTAL NUMBER OF DAYS WORKED BY THE GROUP OF WORKERS DURING THE SAME PERIOD.



■ 2012
■ 2011
■ 2010

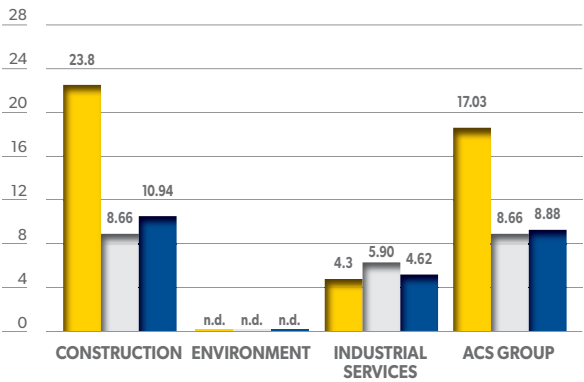
8.2.3.2. Accident Indicators for Subcontractors

The spreading of the risk prevention culture among suppliers, contractors and collaborating companies is another of the Group’s basic lines of action in this subject. Details on the control and management efforts in this area are included in this document in the Suppliers section.



FREQUENCY RATE

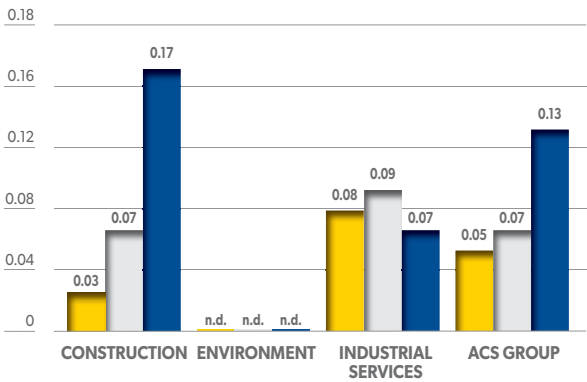
NUMBER OF ACCIDENTS THAT OCCURRED DURING THE WORKING DAY FOR EVERY MILLION HOURS WORKED



■ 2012
■ 2011
■ 2010

SEVERITY RATE

NUMBER OF WORKING DAYS LOST DUE TO ACCIDENTS PER THOUSAND HOURS WORKED



8. COMMITMENT TO THE SOCIAL SETTING



8.3. Social Action in the ACS Group

2012 Milestones

Outstanding among the ACS Foundation's actions executed this year are:

- The completion of the accessible opening of the Convent of Santa Clara in Tordesillas and the Las Huelgas Monastery in Burgos and execution of the accessibility project for the Yuste Monastery.
- Active participation in the Spanish National Environment Conference, CONAMA 12, held under the slogan "Let's reinvent ourselves".

Challenges for 2013

Carrying out of the accessibility project for the Royal Palace of La Almudaina and completion of the accessibility for the Yuste Monastery, jointly with Spanish National Heritage and the Spanish Royal Board on Disability.

Environmental Education Programme to instil values of respect for the environment.

Publishing of the book on the restoration of the Colegio de Infantes, to be converted into the Permanent Museum of Tapestries of Toledo.

The ACS Group channels its social action through the ACS Foundation, the formal social action policy of which is stated in its foundation charters and which is guided by several principles for action:

- Philanthropic action by means of donations and contributions to specialised institutions.
- Actions in various fields of work: accessibility, assistance to development, environment, cultural and educational promotion, dissemination and restoration of Spanish national heritage, collaboration with scientific institutions and sponsorship and patronage of philanthropic institutions, universities, technical schools and other learning centres.
- Selection of projects which provide the greatest social benefit – carried out with prestigious bodies, leaders in their field – and of great general interest.
- Setting up of mixed monitoring committees, between donor and beneficiary, to monitor the execution of significant projects.

Annually, the ACS Foundation prepares its Action Plan, in which it explains in detail the activities planned for the following year. This report shows the most significant projects with the investment allocated for each area of action.

In 2012, the ACS Foundation spent €3,898 million, equivalent to 92.84% of its budget and similar to the amount in the previous year.

A budget of €4.201 million has been approved for 2013, slightly higher than the previous year.

8.3.1. Impact and Monitoring of Social Actions

Before each philanthropic project is carried out, the ACS Foundation identifies the social impact it may have. For example, before carrying out the accessibility project for the El Escorial Monastery in 2010, or the projects at Las Huelgas and Tordesillas in 2011 and the Yuste Monastery in 2012, and as a preliminary measure to gauge their benefit to society, the number of complaints recorded due to problems with accessibility to the monument was analysed, as well as the number of visits annually people with disabilities have been able to make on guided visits after the ACS Foundation's action, and their level of satisfaction.

Once the projects have been completed, the ACS Foundation carries out monitoring of the social benefit generated and continuance of investment actions is defined for the most successful initiatives.⁴⁰

⁴⁰ An investment of €400,000 has been to improve the specified monuments: €200,000 in the case of the 2010 El Escorial Monastery project, €200,000 on the two projects in 2011 (Las Huelgas and Tordesillas) and €165,000 on the Yuste Monastery in 2012.

8.3.2. Activities in 2012

During 2012, the ACS Foundation carried out activities in the framework of its action plans, with growth in all fields, especially in scientific, technological and social research.

The programmes carried out by the ACS Foundation relate to:

- Elimination of barriers and full accessibility in favour of people with disabilities and reduced mobility.
- Education on and defence of the environment.
- Restoration of monumental historical heritage.
- Scientific and technical research.
- Sponsorship of other foundations and institutions.
- Support for cultural activities.
- Support for sporting activities.
- Cooperation for development.
- Various support actions and donations.

In 2012, on the initiative of the ACS Foundation and in the framework of the collaboration agreement with Spanish National Heritage and the Spanish Royal Board on Disability, the Convent of Santa Clara in Tordesillas and the Las Huelgas Monastery in Burgos were made accessible, achieving 100% accessibility for people with reduced mobility, and the latter was opened by Her Majesty Queen Sofia in September of last year. The accessibility project for the Yuste Monastery was prepared, the works for which will be complete in June 2013. From that time, the Monastery will be fully accessible to people with reduced mobility.

With regards to the programme to eliminate barriers for people with disabilities, the actions carried out in previous years have been expanded, relating to training professionals who head technical projects for building, town planning and transport, "universal design", as well as the holding of seminars on accessibility in Spanish monumental architectural heritage and on research relating to accessible sports facility design, with the Spanish Paralympic Committee, publication of which will take place in the coming months. The Accessibility Manual for Municipal Specialists, as written together with the ONCE Foundation, with widespread effects in Spain and internationally, was published.



8. COMMITMENT TO THE SOCIAL SETTING

Collaboration continued in the Queen Sofia Prizes 2012 for Universal Accessibility to Spanish and Latin American Municipalities, jointly with the Spanish Royal Board on Disability and the Spanish Cooperation Agency for Development (AECID). In 2012, the prizes went to the Local Councils of Carranque (Toledo), Cáceres and Burgos and Valladolid (ex-aequo) and the Council of Miraflores, Lima (Peru) and Medellín (Colombia).

In the field of dissemination and restoration of national architectural heritage, the ACS Foundation published a book on the restoration of the old Banco de España building in Santiago de Compostela, which has become the Museum of Pilgrimages, and another on the restoration of the Courthouse in Burgos.

Similarly, there was involvement in various publications related to the historical heritage programme, outstanding among which is the publishing of the book "Spanish Architecture 1975-2010. 35+ Building in Democracy", for which the ACS Foundation received the prize from the Official Architects' Association of Madrid.

Se ha incrementado notablemente el apoyo a Support increased notably to research activities, especially in the field of medicine, to accessibility to architectural heritage and in the socio-economic area, through sponsorship of institutions with these purposes.

Particularly significant within the environment programme was the support to the **"CONAMA 12" SPANISH NATIONAL ENVIRONMENT CONFERENCE**, which, under the slogan "Let's reinvent ourselves" called professionals, businesspeople, heads of departments of various authorities, researchers and teaching staff and representatives of social institutions involved with the environment in one way or another, from Spain and abroad, to a meeting.

The ACS Group's different areas – Construction, Industrial Services and Services and Concessions – took part actively in the Conference.

Activities related to International Technical Cooperation were consolidated through the actions carried out in the framework of the public-private strategic alliance, made with the Secretary of State for International Cooperation, anticipating that the ACS Foundation, with support from the Founder, will be able to carry out technical support and training activities in various subjects and co-sponsor the programmes deriving from it. In 2012, the Foundation collaborated in the Ibero-American Meeting on Universal Accessibility, attended by representatives from 16 Ibero-American countries and in the Queen Sofia Prizes to Latin American local councils.

The ACS Foundation and the United Nation's specialised agency, the World Tourism Organization (UNWTO), made up of 202 countries, signed a Memorandum of Understanding setting a framework for cooperation for preparing the UNWTO's first report on good public-private practices to promote universal accessibility to the benefit of all.

A result of this cooperation was the preparation of a report inspired by and gathering together the experience accumulated over years by the ACS Foundation in good practices in restoring historical and natural heritage in significant tourist destinations, in the training of specialists and in technical cooperation in the area of universal accessibility, as well as in research and development of products to make Universal Accessibility (UA) a reality.

This report will be released at the next General Assembly of the World Tourism Organization, to the 202 countries it comprises.

9. AWARDS, RECOGNITIONS, MEMBERSHIPS

- The ACS Group has been recognised for its work in the field of sustainability by being included in the Dow Jones Sustainability Index for 2012 and 2013.
- The ACS Group is a signatory to the United Nations Global Compact.
- ACS is a world leader in the development of infrastructure concessions, according to Public Works Financing magazine.
- ACS is the sixth largest company in the world by sales figures, according to the ENR magazine ranking published in August 2012.
 - The second largest quoted company in that list.
 - The company with the greatest amount of international activity in the world.
- ACS is the 240th largest company in the world by turnover, according to the ranking in the magazine Fortune for 2012.
- The ACS Group is one of Spain's most reputable companies according to the monitor Merco.



10. PRINCIPLES FOR THE PREPARATION OF THE 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

The report considers all the ACS Group's activities as a global operator, in all the countries where it is present. To this effect, the information published includes the operations carried out in the Environment, Construction, Industrial Services and Concessions areas.

The ACS Group has developed tools for the collection and consolidation of both quantitative and qualitative information on sustainability to align the management of all the companies with the ACS Group's strategic priorities. This tool has increased its scope considerably.

The information gathered in this report refers, basically, to the 2012 financial year. It also includes information from previous years, depending on its relevance and availability, to enable the readers to be able to form a more complete opinion on the company's development. The quantitative indicators present the ACS Group's evolution in 2012 and, generally, the two previous years

The 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. Those cases where the scope is other than 100% are specified clearly 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 recommendations of the G3 guidelines 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.



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 has developed management tools to facilitate operational control of sustainability management and its integration into the businesses. The contents of this tool are aligned with GRI requirements, to the request for information from the selective sustainability stock market indices and by institutional investors and ratings agencies which take matters related to sustainability into account.

Context of Sustainability

The objective of this report is to express the actions 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 2012, without omitting information of relevance to our stakeholders. The coverage of the Report was determined in parallel with its content.

In the case that there were 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 2012 Corporate Responsibility Report offer a complete view of the significant impacts in the economic, social and environmental fields.

Comparability

As far as possible, the information included in this report has been organised in such a manner that the stakeholders 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 actions.

Accuracy and Clarity

This report contains numerous tables, graphs and outlines, 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 ACS Group's actions. 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 actions in 2012 in the economic, social and environmental fields.

Reliability

The reliability of the information included in this 2012 Corporate Responsibility Report was checked by KPMG, the firm responsible for its verification.

11. SCOPE OF THE DATA

| CLIENTS | Scope (over total ACS Group Sales) |
|--|--|
| Number of client satisfaction surveys carried out | 44.16% |
| Percentage of client responses of "satisfied" or "very satisfied" over the total number of surveys carried out (%) | 17.26% |
| Number of complaints received from clients | 17.26% |
| Number of complaints dealt with | 16.96% |
| Number of complaints resolved satisfactorily | 16.54% |
| Make an estimate of the percentage of client claims / complaints referring to problems related to confidentiality | 17.13% |
| Total value of significant fines resulting from breaches of rules relating to the organisations supply of services (€ million) | 36.53% |

| QUALITY | Scope (over total ACS Group Sales) |
|---|--|
| Percentage of sales from activities certified under the ISO 9001 standard (%) | 76.48% |
| Investments made in quality improvements (€ million) | 48.63% |
| Number of quality audits carried out | 36.83% |
| Make an estimate of the percentage of your company's projects which have been audited for quality in the last year | 48.63% |
| Total number of incidents involving failure to comply with regulations in terms of quality which have resulted in warnings or fines | 48.63% |

| SUPPLIERS | Scope (over total ACS Group Sales) |
|--|--|
| Number of suppliers and subcontractors contracted in the indicated period | 95.11% |
| Estimate of the percentage of contracts which include criteria on human rights or which are subject to analysis in this respect (%) | 92.03% |
| Estimate of the percentage of contracts rejected or those on which conditions have been imposed as a consequence of failures to comply in environmental, quality, human rights or ethics and professionalism areas | 41.77% |
| Number of suppliers from the local community | 95.11% |
| Percentage of certified wood purchased (t) | 10.95% |
| Total wood purchased (t) | 18.41% |
| Steel manufactured with recycled materials (t) | 50.61% |
| Total steel purchased (t) | 58.63% |
| Cement / concrete including recycled aggregates purchased (t) | 10.95% |
| Total cement / concrete purchased (t) | 58.63% |
| Recycled aggregates purchased (t) | 10.95% |
| Total aggregates purchased (t) | 10.42% |
| Recycled glass purchased (t) | 10.95% |
| Total glass purchased (t) | 10.95% |
| Recycled pipes / insulation (generally PVC) purchased (t) | 10.95% |
| Total pipes / insulation (generally PVC) purchased (t) | 11.51% |

| R&D+I | Scope (over total ACS Group Sales) |
|--|--|
| Investment in R&D+i (€ million) | 34.26% |
| Number of R&D+i projects in progress at 31 December | 93.18% |
| Estimate the number of patents registered in the year | 93.04% |
| Number of awards received | 93.04% |
| Number of research/technology centres with which your company collaborates | 46.10% |
| Number of universities with which your company collaborates | 46.10% |
| Others | 11.97% |

| ENVIRONMENT | Scope (over total ACS Group Sales) |
|--|--|
| Group production under environmental certification (ISO 14001) (%) | 95.74% |
| Number of environmental audits carried out in your company | 69.02% |
| Number of environmental incidents which occurred in the year | 95.74% |
| Number of environmental incidents with sanctioning administrative proceedings in the year | 36.83% |
| Total value of fines due to sanctioning administrative proceedings (€ million) | 27.75% |
| Number of significant accidental spills | 29.37% |
| Significant accidental spills (m3) | 25.12% |
| Total water consumption (m3) | 55.60% |
| Consumption of water from the public mains (m3) | 55.60% |
| Consumption of water from other sources (m3) | 28.26% |
| Total waste water discharged (m3) | 27.39% |
| Discharges of waste water to the public sewers (m3) | 28.73% |
| Discharges of waste water to the sea/rivers/lakes (m3) | 28.13% |
| Discharges of waste water to specific water receiving facilities (m3) | 28.13% |
| Hazardous waste generated (t) | 35.91% |
| Composting, reuse, recycling, recovery (exploitation) (%) | 34.57% |
| Dumping or other destinations (%) | 35.91% |
| Non-hazardous waste generated (t) | 54.89% |
| Composting, reuse, recycling, recovery (exploitation) (%) | 54.25% |
| Dumping or other destinations (%) | 55.60% |
| Petrol consumed (million litres) | 35.37% |
| Diesel consumed (million litres) | 35.37% |
| Petrol + diesel consumed (million litres) | 6.76% |
| Natural gas consumption (m3) | 28.76% |
| Electricity consumption (MWh) | 19.78% |
| Energy savings due to conservation and efficiency improvements (MWh) | 24.59% |
| Direct emissions of greenhouse gases not associated with the use of fuels (Scope 1 process emissions) (tCO ₂ e) | 76.85% |
| Indirect emissions (Scope 3): Business Travel | |
| Air: total km travelled on short-haul flights (< 500 km) | 74.40% |
| Indirect emissions (Scope 3): Business Travel | |
| Air: total km travelled on medium-haul flights (500 km < X < 1,600 km) | 27.29% |
| Indirect emissions (Scope 3): Business Travel | |
| Air: total km travelled on long-haul flights (> 1,600 km) | 25.92% |

11. SCOPE OF THE DATA

| ENVIRONMENT | Scope (over total ACS Group Sales) |
|---|--|
| Other indirect emissions (Scope 3): Business Travel Total km travelled in private vehicles for business purposes | 33.01% |
| Other indirect emissions (Scope 3): Business Travel Total km travelled by train | 34.86% |
| Other indirect emissions (Scope 3): Business Travel Total km travelled by boat | 23.21% |
| Other indirect greenhouse gas emissions (Scope 3). Others (tCO ₂ e) | 24.88% |
| Emissions of Oxides of Nitrogen (NO _x) (t) | 10.19% |
| Emissions of Oxides of Sulphur (SO _x) (t) | 10.19% |
| Emissions of solid particles (t) | 20.80% |
| Other gases (t) | 20.80% |
| Emissions of substances that deplete the ozone layer (t) | 11.26% |

| HUMAN RESOURCES | Scope (over total no. of employees) |
|--|---|
| Number of employees with part-time working days | 52.63% |
| Number of employees of nationality different to that of your company's head office | 92.29% |
| Number of senior managers from the local community | 92.29% |
| Number of incidents which occurred due to discrimination | 45.17% |
| Number of employees affiliated to a trade union organisation | 92.29% |
| Training given by professional category (hours): University graduates | 33.37% |
| Training given by professional category (hours): Diploma holders | 33.37% |
| Training given by professional category (hours): Non-graduate line personnel | 33.37% |
| Training given by professional category (hours): Clerical personnel | 33.37% |
| Training given by professional category (hours): Other staff | 33.37% |
| Training given: Total number of teaching hours | 33.37% |
| Total number of courses given | 52.63% |
| Number of attendance courses | 52.63% |
| Number of non-attendance courses | 52.63% |
| Number of courses given with Production content | 52.63% |
| Number of courses given with Safety in the Workplace content | 92.29% |
| Number of courses given with Environmental content | 52.63% |
| Number of courses given with Human Rights, Ethics, Integrity or Conduct content | 92.29% |
| Total number of participants in training activities in the year | 52.63% |
| Investment in training (€ million) | 52.63% |
| Number of employees subject to performance assessment processes | 92.29% |
| Number of employees promoted during the year | 51.94% |
| Make an estimate of the percentage of university graduates affected by a formal competence management system in your company | 90.94% |
| Make an estimate of the percentage of diploma holders affected by a formal competence management system in your company | 90.94% |
| Number of people hired during the year | 92.29% |
| Total staff turnover (%) | 92.29% |
| Turnover of men (%) | 92.29% |
| Turnover of women (%) | 92.29% |

| HUMAN RESOURCES | Scope (over total no. of employees) |
|--|---|
| Total number of days lost (due to absenteeism) (employees) | 52.63% |
| Total number of days worked by employees of your company | 52.52% |
| Total number of days lost (due to absenteeism) (contractors) | 27.66% |
| Total number of days worked by subcontractors contracted by your company | 69.79% |
| If a working environment survey has been carried out in your company during the current year, report the percentage of "satisfied" or "very satisfied" responses from employees over the total number of surveys (%) | 82.02% |
| Number of disabled people | 52.33% |
| Percentage of MEN in the company | 92.29% |
| Percentage of MEN of 35 or younger | 92.29% |
| Percentage of MEN with ages between 36 and 50 years | 92.29% |
| Percentage of MEN of 51 or older | 92.29% |
| Percentage of MEN with an open-ended contract | 92.29% |
| Percentage of MEN with a partial contract | 92.29% |
| Percentage of MEN with full-time working days | 52.63% |
| Percentage of MEN with part-time working days | 52.63% |
| Percentage of WOMEN in the company | 92.29% |
| Percentage of WOMEN of 35 or younger | 92.29% |
| Percentage of WOMEN with ages between 36 and 50 years | 92.29% |
| Percentage of WOMEN of 51 or older | 92.29% |
| Percentage of WOMEN with an open-ended contract | 92.29% |
| Percentage of WOMEN with a partial contract | 92.29% |
| Percentage of WOMEN with full-time working days | 52.63% |
| Percentage of WOMEN with part-time working days | 52.63% |

| HEALTH AND SAFETY | Scope (over total no. of employees) |
|--|---|
| Investment in health and safety in the workplace (€ million) | 33.60% |
| Total number of hours worked by employees of your company | 52.86% |
| Total number of hours worked by contractors | 50.84% |
| Total number of accidents suffered by the company's own employees | 52.86% |
| Total number of accidents suffered (by contractors) | 45.90% |
| Total number of working days lost by own employees | 52.86% |
| Total number of working days lost (by contractors) | 45.90% |
| Total number of accidents with employee time off | 52.86% |
| Total number of accidents with time off (contractors) | 45.90% |
| Total number of cases of occupational diseases (own employees) | 33.60% |
| Total number of cases of occupational diseases (contractors) | 24.23% |
| Number of hours of training in occupational health and safety received by your company's employees during the year | 52.38% |
| Total number of employees with occupations with risks of contracting specific diseases | 24.79% |

12. VERIFICATION REPORT



KPMG Asesores S.L.
Edificio Torre Europa
Paseo de la Castellana, 95
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 the Corporate Responsibility Report of Actividades de Construcción y Servicios, S.A. (hereinafter ACS) for the year ended 31 December 2012 (hereinafter "the Report").

ACS management is responsible for the preparation and presentation of the Report in accordance with the Sustainability Reporting Guidelines version 3.1 (G3.1) of the Global Reporting Initiative as described in section 10 of the Report, entitled Principles for the Preparation of the Report. This section details the self-declared application level, which has been confirmed by Global Reporting Initiative. Management is also responsible for the information and assertions contained within the Report; 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, based on the work performed, to issue a report. 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 (IAASB) of the International Federation of Accountants (IFAC) and with the Performance Guide on the revision of Corporate Responsibility Reports of the Instituto de Censores Jurados de Cuentas de España (ICJCE). These standards require 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 ethical requirements, including those of independence that form part of the International Ethics Standards Board for Accountants Code of Ethics.

The extent of evidence gathering procedures performed in a limited assurance engagement is less than that for a reasonable assurance engagement, and therefore also the level of assurance provided. This report should by no means be considered as an audit report.

Our limited assurance engagement work has consisted of making inquiries to Management, primarily to the persons responsible for the preparation of information presented in the Report, and applying the following analytical and other evidence gathering 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.
- Visit to a waste treatment plant (La Paloma recycling, composting and biomethanisation plant), selected based on a risk analysis considering quantitative and qualitative criteria.
- 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 Cooperative ("KPMG International"), a Swiss entity.

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N.I.F. B-82498650

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 2012 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 (G3.1) of the Global Reporting Initiative as described in the section 10 of the Report, entitled Principles for the Preparation 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 on original in Spanish)

José Luis Blasco Vázquez

11 April 2013

13. GRI INDEX



Statement GRI Application Level Check

GRI hereby states that **Grupo ACS** has presented its report “Corporate Social Responsibility Report” to GRI’s Report Services which have concluded that the report fulfills the requirement of Application Level A+.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines. For methodology, see www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 20 February 2013

Nelmara Arbex
Deputy Chief Executive
Global Reporting Initiative



The “+” has been added to this Application Level because Grupo ACS has submitted (part of) this report for external assurance. GRI accepts the reporter’s own criteria for choosing the relevant assurance provider.

The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world’s most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. www.globalreporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 15 February 2013. GRI explicitly excludes the statement being applied to any later changes to such material.

14. WE WOULD LIKE TO HEAR 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 our 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 count on the opinion of the different stakeholders. Hence, we would be grateful to receive any opinion you may have on this report at:

ACS Group

Avda. Pío XII, 102

Madrid 28036, Spain

Phone: +34 91 343 92 39

E-mail: info@grupoacs.com

 For further information, see the website,
www.grupoacs.com



MAIN PERFORMANCE INDICATORS

PROFILE

STRATEGY AND ANALYSIS

Cross-reference/Direct answer

| | | |
|-----|--|---------------------------------------|
| 1.1 | Statement from the most senior decision-maker of the organization. | Paragraph 1. Letter from the Chairman |
| 1.2 | Description of key impacts, risks, and opportunities. | 1; 2.3.2: 3.1 |

ORGANIZATIONAL PROFILE

Cross-reference/Direct answer

| | | |
|------|--|--------------|
| 2.1 | Name of the organization. | 2.1.1 |
| 2.2 | Primary brands, products, and/or services. | 2.2 |
| 2.3 | Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures. | 2.2 |
| 2.4 | Location of organization's headquarters. | 2.1.1 |
| 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. | 2.1.2 |
| 2.6 | Nature of ownership and legal form. | 2.3.1 |
| 2.7 | Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries). | 2.1.2; 4.3.2 |
| 2.8 | Scale of the reporting organization. | 2.1.2 |
| 2.9 | Significant changes during the reporting period regarding size, structure, or ownership. | 2.2; 2.3.1 |
| 2.10 | Awards received in the reporting period. | Paragraph 9 |

REPORT PARAMETERS

Cross-reference/Direct answer

| | | |
|------|---|---|
| 3.1 | Reporting period (e.g., fiscal/calendar year) for information provided. | 2.1.2 |
| 3.2 | Date of most recent previous report (if any). | Año 2011 |
| 3.3 | Reporting cycle (annual, biennial, etc.) | Anual |
| 3.4 | Contact point for questions regarding the report or its contents. | infogrupoacs@grupoacs.com |
| 3.5 | Process for defining report content. | 2.2; 2.4.1; 10 The company has not developed a specific materiality study, but has made an internal exercise involving all business considering the priority issues for ACS that are aligned to GRI requirements. It has improved and increased the request for information not only to meet GRI questions but also for selective sustainability indexes, institutional investors and rating agencies that consider sustainability issues. |
| 3.6 | Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance. | Paragraph 11 |
| 3.7 | State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope). | Paragraph 11 |
| 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. | Paragraph 11 |
| 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. | 2.2 |
| 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). | 3.1 |
| 3.11 | Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report. | No changes |
| 3.12 | Table identifying the location of the Standard Disclosures in the report. | Paragraph 12 |
| 3.13 | Policy and current practice with regard to seeking external assurance for the report. | Paragraph 12 |

| GOVERNANCE, COMMITMENTS, AND ENGAGEMENT | | Cross-reference/Direct answer |
|---|--|-------------------------------|
| 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. | 2.3.2 |
| 4.2 | Indicate whether the Chair of the highest governance body is also an executive officer. | 2.3.2.1 |
| 4.3 | For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members. | 2.3.2.1 |
| 4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body. | 5.2.2; 5.3.1 |
| 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). | 2.3.2.2 |
| 4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided. | 2.3.2.2; 2.3.3 |
| 4.7 | Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity. | 2.3.2.2 |
| 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. | 2.1; 5.2 |
| 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. | 2.3.2.2; 2.3.3; 5.2 |
| 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance. | 2.3.2.2 |
| 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organization. | 2.3.3 |
| 4.12 | Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses. | 5.2 |
| 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. | 8.2.2.7 |
| 4.14 | List of stakeholder groups engaged by the organization. | 2.4.1 |
| 4.15 | Basis for identification and selection of stakeholders with whom to engage. | 2.4.1 |
| 4.16 | Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group. | 2.4.1 |
| 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. | 2.4.1 |

MAIN PERFORMANCE INDICATORS

DISCLOSURES ON MANAGEMENT APPROACH (DMAs)

| DISCLOSURE ON MANAGEMENT APPROACH EC | Cross-reference/Direct answer |
|--------------------------------------|-------------------------------|
| Economic Performance. | 4.1 |
| Market presence. | 2.1.2 |
| Indirect Economic Impacts. | 4.1 |

| DISCLOSURE ON MANAGEMENT APPROACH EN | Cross-reference/Direct answer |
|--|--|
| Materials. | 7.1.5.2 |
| Energy. | 7.1.5.2 |
| Water. | 7.1.6 |
| Biodiversity. | 7.1.7 |
| Emissions, effluents and waste. | 7.1.5.1 |
| Land Degradation, Contamination and Remediation. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |
| Products and Services. | 4.4 |
| Compliance. | 7.1.2 |
| Transport. | 7.1.3 |
| Overall. | 7.1.1 |

| DISCLOSURE ON MANAGEMENT APPROACH LA | Cross-reference/Direct answer |
|---------------------------------------|--|
| Employment. | 8.1.1; 8.1.2 |
| Labor/management relations. | 8.1.1; 8.1.2 |
| Occupational Health and Safety. | 8.2.1; 8.2.2; 8.2.3 |
| Training and Education. | 8.1.6 |
| Diversity and equal opportunity. | 8.1.3 |
| Equal remuneration for women and men. | All the information related to salaries is considered confidential. The salaries in contracting activities are an operating key aspect and are treated as a competitive advantage. |

| DISCLOSURE ON MANAGEMENT APPROACH HR | Cross-reference/Direct answer |
|---|-------------------------------|
| Investment and procurement practices. | 4.5.2 |
| Non-discrimination. | 8.1.3.1 |
| Freedom of association and collective bargaining. | 4.5.2.2; 8.1.1 |
| Child labor. | 4.5.2.2; 8.1.1 |
| Prevention of forced and compulsory labor. | 4.5.2.2; 8.1.1 |
| Security Practices. | 8.2.2.7 |
| Indigenous rights. | 5.2; 5.2.2 |
| Assessment. | 4.4.2.3; 4.5.2.1 |
| Remediation. | 4.5.2.2; 5.2.2 |

| DISCLOSURE ON MANAGEMENT APPROACH SO | Cross-reference/Direct answer |
|--------------------------------------|-------------------------------|
| Local communities. | 7.1.7; 8.3.1 |
| Corruption. | 5.2.2 |
| Public policy. | 2.4.2 |
| Anti-competitive behavior. | 2.4.2 |
| Compliance. | 4.3.2.2; 4.3.2.3; 7.1.2 |

| DISCLOSURE ON MANAGEMENT APPROACH PR | Cross-reference/Direct answer |
|--------------------------------------|-------------------------------|
| Customer health and safety. | 4.4.2.4 |
| Product and service labelling. | n/a |
| Marketing communications. | n/a |
| Customer privacy. | 4.3.2.3 |
| Compliance. | 4.3.2.3 |

PERFORMANCE INDICATORS

| ECONOMIC | | Cross-reference/Direct answer |
|---------------------------|---|--|
| Economic performance | | |
| 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. | 4.1; 8.3 |
| EC2 | Financial implications and other risks and opportunities for the organization's activities due to climate change and other sustainability issues. | 7.1.4 |
| EC3 | Coverage of the organization's defined benefit plan obligations. | 8.1.4.1 |
| EC4 | Significant financial assistance received from government. | 2.4.2 |
| Market presence | | |
| EC5 | Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation. | n/a |
| EC6 | Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation. | 4.5.2.1 |
| EC7 | Procedures for local hiring and proportion of senior management and all direct employees, contractors and sub-contractors hired from the local community at significant locations of operation. | 8.1.2; 8.1.3.1 |
| Indirect economic impacts | | |
| EC8 | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement. | 2.4.2; 8.3 |
| EC9 | Understanding and describing significant indirect economic impacts, including the extent of impacts. | n/a |
| ENVIRONMENTAL | | Cross-reference/Direct answer |
| Materials | | |
| EN1 | Materials used by weight, value or volume. | 7.1.5.2; 7.2.2; 7.4.1 |
| EN2 | Percentage of materials used that are recycled and reused input materials. | 7.1.5.2; 7.2.2; 7.4.1 |
| Energy | | |
| EN3 | Direct energy consumption by primary energy source. | 7.1.4; 7.1.5.2 |
| EN4 | Indirect energy consumption by primary source.. | 7.1.5.2 |
| CRE1 | Building energy intensity. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |
| EN5 | Energy saved due to conservation and efficiency improvements. | 7.1.5.2 |
| EN6 | Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives. | 7.1.4; 7.1.5.2 |
| EN7 | Initiatives to reduce indirect energy consumption and reductions achieved. | n/a |
| Water | | |
| EN8 | Total water withdrawal by source. | 7.1.6; 7.2.1 |
| EN9 | Water sources significantly affected by withdrawal of water. | n/a |
| EN10 | Percentage and total volume of water recycled and reused. | n/a |
| CRE2 | Building water intensity. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |

MAIN PERFORMANCE INDICATORS

PERFORMANCE INDICATORS

ENVIRONMENTAL

Cross-reference/Direct answer

Biodiversity

| | | |
|------|---|--------------|
| EN11 | Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas. | 7.1.7; 7.2.4 |
| EN12 | Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas. | 7.1.7; 7.2.4 |
| EN13 | Habitats protected or restored. | 7.1.7 |
| EN14 | Strategies, current actions, and future plans for managing impacts on biodiversity. | 7.1.7 |
| EN15 | Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk. | 7.1.7 |

Emissions, Effluents and waste

| | | |
|------|---|--|
| EN16 | Total direct and indirect greenhouse gas emissions by weight. | 7.1.4.1; 7.1.4.2 |
| EN17 | Other relevant indirect greenhouse gas emissions by weight. | 7.1.4.2 |
| CRE3 | Greenhouse gas emissions intensity from buildings. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |
| CRE4 | Greenhouse gas emissions intensity from new construction and redevelopment activity. | 7.1.4.1 |
| EN18 | Initiatives to reduce greenhouse gas emissions and reductions achieved. | 7.1.4 |
| EN19 | Emissions of ozone-depleting substances by weight. | 7.1.5.3 |
| EN20 | NOx, SOx, and other significant air emissions by type and weight | 7.1.5.3 |
| EN21 | Total water discharge by quality and destination. | 7.1.6; 7.3.2 |
| EN22 | Total weight of waste by type and disposal method. | 7.1.5.1; 7.2.3 |
| EN23 | Total number and volume of significant spills. | 7.1.6 |
| EN24 | Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally. | n/a |
| EN25 | Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff. | n/a |

Land Degradation, Contamination and Remediation

| | | |
|------|---|--|
| CRE5 | Land and other assets remediated and in need of remediation for the existing or intended land use according to applicable legal designations. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |
|------|---|--|

Products and services

| | | |
|------|---|---------------------|
| EN26 | Initiatives to enhance efficiency and mitigate environmental impacts of products and services, and extent of impact mitigation. | 7.1.5; 7.1.6; 7.2.3 |
| EN27 | Percentage of products sold and their packaging materials that are reclaimed by category. | n/a |

Compliance

| | | |
|------|--|-------|
| EN28 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations. | 7.1.2 |
|------|--|-------|

Transport

| | | |
|------|---|------------------|
| EN29 | Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce. | 7.1.4.2; 7.1.5.2 |
|------|---|------------------|

Overall

| | | |
|------|--|-----|
| EN30 | Total environmental protection expenditures and investments by type. | n/a |
|------|--|-----|

PERFORMANCE INDICATORS

SOCIAL: LABOR PRACTICES AND DECENT WORK

Cross-reference/Direct answer

Employment

| | | |
|------|--|--|
| LA1 | Total workforce by employment type, employment contract, and region, broken down by gender. | 8.1.2 |
| LA2 | Total number and rate of new employee hires and employee turnover by age group, gender, and region. | 8.1.3.3 |
| LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations. | 8.1.4.1; 8.1.4.2 |
| LA15 | Return to work and retention rates after parental leave, by gender. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |

Labor/management relations

| | | |
|-----|---|---------|
| LA4 | Percentage of employees covered by collective bargaining agreements. | 8.1.3.2 |
| LA5 | Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements. | 8.1.3.2 |

Occupational health and safety

| | | |
|------|---|---------|
| LA6 | Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. | 8.2.2.5 |
| LA7 | Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender. | 8.2.3 |
| CRE6 | Percentage of the organization operating in verified compliance with an internationally recognized health and safety management system. | 8.2.2.1 |
| LA8 | Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases. | 8.2.2.7 |
| LA9 | Health and safety topics covered in formal agreements with trade unions. | 8.2.2.5 |

Training and education

| | | |
|------|--|---------|
| LA10 | Average hours of training per year per employee by gender, and by employee category. | 8.1.6 |
| LA11 | Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings. | n/a |
| LA12 | Percentage of employees receiving regular performance and career development reviews, by gender. | 8.1.5.2 |

Diversity and equal opportunity

| | | |
|------|---|------------------|
| LA13 | Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity. | 2.3.2.1; 8.1.3.1 |
|------|---|------------------|

Equal remuneration for women and men

| | | |
|------|---|--|
| LA14 | Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation. | All the information related to salaries is considered confidential. The salaries in contracting activities are an operating key aspect and are treated as a competitive advantage. |
|------|---|--|

MAIN PERFORMANCE INDICATORS

PERFORMANCE INDICATORS

SOCIAL: HUMAN RIGHTS

Cross-reference/Direct answer

Investment and procurement practices

| | | |
|-----|---|---------|
| HR1 | Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening. | 4.5.2.1 |
| HR2 | Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken. | 4.5.2 |
| HR3 | Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained. | 8.1.6 |

Non-discrimination

| | | |
|-----|--|---------|
| HR4 | Total number of incidents of discrimination and corrective actions taken | 8.1.3.1 |
|-----|--|---------|

Freedom of association and collective bargaining

| | | |
|-----|--|----------------|
| HR5 | Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights. | 4.5.2.2; 8.1.1 |
|-----|--|----------------|

Child labor

| | | |
|-----|--|----------------|
| HR6 | Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor. | 4.5.2.2; 8.1.1 |
|-----|--|----------------|

Forced and compulsory labor

| | | |
|-----|---|----------------|
| HR7 | Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of all forms of forced or compulsory labor. | 4.5.2.2; 8.1.1 |
|-----|---|----------------|

Security practices

| | | |
|-----|---|---------|
| HR8 | Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations. | 8.2.2.7 |
|-----|---|---------|

Indigenous rights

| | | |
|-----|--|-----|
| HR9 | Total number of incidents of violations involving rights of indigenous people and actions taken. | n/a |
|-----|--|-----|

Assessment

| | | |
|------|---|------------------|
| HR10 | Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments. | 4.4.2.3; 4.5.2.1 |
|------|---|------------------|

Remediation

| | | |
|------|---|----------------|
| HR11 | Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms. | 4.5.2.2; 5.2.2 |
|------|---|----------------|

PERFORMANCE INDICATORS

SOCIAL: SOCIETY

Cross-reference/Direct answer

Local communities

| | | |
|------|--|--|
| SO1 | Percentage of operations with implemented local community engagement, impact assessments, and development programs. | 7.1.7; 8.3.1 |
| SO9 | Operations with significant potential or actual negative and positive impacts on local communities. | 7.1.7; 8.3.1 |
| SO10 | Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities. | 7.1.7; 8.3.1 |
| CRE7 | Number of persons voluntarily and involuntarily displaced and/or resettled by development, broken down by project. | Current ACS systems do not measure this indicator. A procedure to start measuring this data will be developed in the future. |

Corruption

| | | |
|-----|--|--------------|
| SO2 | Percentage and total number of business units analyzed for risks related to corruption. | 100% |
| SO3 | Percentage of employees trained in organization's anti-corruption policies and procedures. | 5.2.2; 8.1.6 |
| SO4 | Actions taken in response to incidents of corruption. | 5.2.2 |

Public policy

| | | |
|-----|--|-------|
| SO5 | Public policy positions and participation in public policy development and lobbying. | 2.4.2 |
| SO6 | Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country. | 2.4.2 |

Anti-competitive behavior

| | | |
|-----|---|-------|
| SO7 | Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes. | 2.4.2 |
|-----|---|-------|

Compliance

| | | |
|-----|--|----------------|
| SO8 | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations. | 4.3.2.2; 7.1.2 |
|-----|--|----------------|

MAIN PERFORMANCE INDICATORS

PERFORMANCE INDICATORS

SOCIAL: PRODUCT RESPONSIBILITY

Cross-reference/Direct answer

Customer health and safety

| | | |
|-----|--|---------|
| 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. | 4.4.2.4 |
| PR2 | Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes. | n/a |

Product and service labelling

| | | |
|------|--|-------------------|
| PR3 | Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements. | n/a |
| CRE8 | Type and number of sustainability certification, rating and labeling schemes for new construction, management, occupation and redevelopment. | 4.4.1; 7.1.2; 7.2 |
| PR4 | Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes. | n/a |
| PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction. | 4.3.2.2 |

Marketing communications

| | | |
|-----|---|-----|
| PR6 | Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship. | n/a |
| PR7 | Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes | n/a |

Customer privacy

| | | |
|-----|--|---------|
| PR8 | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data. | 4.3.2.3 |
|-----|--|---------|

Compliance

| | | |
|-----|---|---------|
| PR9 | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. | 4.3.2.2 |
|-----|---|---------|





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