



Human Rights Policy

Approved by the Board of Directors on July 28, 2022

Translation originally issued in Spanish and prepared in accordance with the regulatory applicable to the Group. In the event of a discrepancy, the Spanish-language version prevails.

TABLE OF CONTENTS

- 1 INTRODUCTION**
- 2 SCOPE AND APPLICATION**
- 3 COMMITMENTS TO HUMAN RIGHTS**
 - 3.1 Commitments to workers in the value chain**
 - 3.2 Commitments to consumers and end-users**
 - 3.3 Commitments relating to the environment and local communities**
- 4 IMPLEMENTATION AND MONITORING OF THE POLICY**
- 5 WHISTLEBLOWING AND COMPLAINTS CHANNELS**
- 6 ENFORCEMENT AND UPDATING OF THE POLICY**

1 INTRODUCTION

ACS Actividades de Construcción y Servicios S.A. and its Group companies (“ACS Group” or “the Group”) has been committed as a business, throughout its history, to respecting human rights in accordance with the ethical principles and the corporate culture that guide the performance of its activities and the achievement of its goals.

By means of this Human Rights Policy, the ACS Group assumes its responsibility to respect internationally recognised human rights, formalising a due diligence process for identifying, preventing, mitigating and reporting on the adverse impacts of its activity on human rights in the scope of its activity and the global value chain, and to be accountable for the effectiveness of this process.

The definition of this Policy, and in general, all of the Group's actions in its procedures, activities and operations with regard to human rights, is based on the international reference standards established by the United Nations (UN), listed below:

- The United Nations International Bill of Human Rights, consisting of: the Universal Declaration of Human Rights (UN, 1948), the International Covenant on Economic, Social and Cultural Rights (UN, 1966), and the International Covenant on Civil and Political Rights (UN, 1966) and the two protocols to it.
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO, 1998), the eight fundamental conventions that complement it, and the Convention concerning Indigenous and Tribal Peoples in Independent Countries.
- The Convention on the Rights of the Child (UN, 1999).
- The Convention on the Prevention and Punishment of the Crime of Genocide (UN, 1948).
- The Convention Against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (UN, 1984).
- The Convention on the Rights of Persons with Disabilities (UN, 2006).
- The Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities (UN, 1992)
- The Declaration on the Rights of Indigenous Peoples (UN; 2007).
- The UN Convention against Transnational Organised Crime and the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UN Convention against Transnational Organised Crime (UN, 2000).
- The Convention on the Elimination of All Forms of Discrimination against Women (UN, 1979).
- The International Convention on the Elimination of All Forms of Racial Discrimination (UN 1969).

- UN Human Rights Council Resolution 48/13 on the human right to a safe, clean, healthy and sustainable environment.
- The African Charter on Human and Peoples' Rights (OAU 1981).
- The American Convention on Human Rights (OAS, 1969).
- The European Convention on Human Rights (Council of Europe, 1953).
- The European Social Charter (Council of Europe, 1965).
- The Charter of Fundamental Rights of the European Union (Parliament, Council and European Commission, 2000).
- National constitutions and laws that recognise or implement human rights.

The ACS Group is committed to avoid causing or actively contributing to any form of adverse impact on the human rights of people engaged in its direct operations and global value chain, as well as to their remediation, by adhering to the following international guidelines:

- The UN Guiding Principles on Business and Human Rights (UN, 2011).
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (OECD, 2011)
- The International Labour Organisation's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

The following internal rules and policies complement this Policy in the Group's commitment to promoting the freedoms and dignity of the people who make up the Group, the environment in which it operates, and its value chain:

- Code of Conduct.
- Code of Conduct for Business Partners.
- Sustainability Policy.
- Corporate Protocol on Due Diligence in regard to Human Rights.
- Risk Control And Management Policy
- Building Materials Policy.
- Environmental Policy.
- Policy for Communication of economic-financial, non-financial and corporate information, and regarding Contacts and Relations with Shareholders and Other Stakeholders.
- Social Action Policy.

- Talent Promotion and Evaluation Policy.
- Occupational Safety and Health Policy

2 SCOPE AND APPLICATION

The ACS Group's Human Rights Policy is directly applicable to all the Group's activities and to all investees in which ACS has management control, and to all its directors, executives and employees.

The ACS Group's management team will make every effort to ensure compliance with the commitments contained in this Policy, and ensure that it is reflected in the policies and operational procedures necessary to instil the commitment assumed throughout the entire Group.

All employees of the Group and its subsidiaries are required to comply with the commitments of this Policy, encouraging staff to act collectively under the same human rights model, thus integrating these principles across the entire value chain.

All suppliers, subcontractors and, in general, all commercial dealings (business partners) are required to comply with the same commitments under this policy and to respect internationally recognised human and labour rights, through the application of the Code of Conduct for Business Partners, as well as the means deployed to supervise compliance. The Group will make every effort to promote the dissemination and adoption of the values set out in this document throughout the global value chain.

The ACS Group acknowledges its human rights obligations alongside its commitment to strictly comply with the regulations and laws of the various territories in which it operates. However, in jurisdictions where this Policy conflicts with applicable law, the highest human rights principles and standards must be applied in each case.

3 COMMITMENTS TO HUMAN RIGHTS

This Policy is fundamentally aimed at promoting and respecting all human rights as recognised in international treaties and applicable law. However, the ACS Group has fixed its priority areas of action in this area in keeping with the United Nations Guiding Principles.

The basic principles of action detailed below represent the ACS Group's areas of greatest impact, based on the potential effects of its global activity on the groups involved: workers throughout the value chain, consumers and end users, local communities and society.

In implementing the provisions of the following commitments, special consideration will be given to the circumstances of particularly vulnerable groups, including migrant workers, indigenous peoples and other minorities, young people, children, the LGBTI community, people with functional, physical and intellectual diversity, and any person or community at risk of social exclusion.

3.1. Commitments to workers in the value chain

Value chain workers include all the ACS Group's own employees, temporary employees and trainees, as well as the employees, temporary employees and trainees of its business partners and their respective value chains. The ACS Group expects all its business partners to strictly comply with core ILO conventions, and with other standards and norms which set out the following commitments to workers' rights:

- Eradication of child labour: promoting safe adolescence and childhood, and ensuring compliance with the provisions of Convention 138 of the International Labour Organisation (ILO) on child labour, always and in all cases rejecting all forms of child labour and slavery.
- Eradication of all forms of forced labour, slavery and human trafficking: rejecting forced or coerced labour, slavery (including practices associated with modern slavery), servitude and human trafficking, and minimising any risks in all operations and the global value chain.
- Decent work: supporting, encouraging and promoting decent work and a living wage that meets workers' and their families' basic needs, with remuneration in line with the duties performed and the number of hours worked, while respecting national minimum wage legislation, and ensuring that payments are made regularly, on time, and directly. ILO standards on working hours and social security, as well as national legislation on working hours and overtime, must be respected. Workers should be provided with accessible and clear rules on working hours, breaks and remuneration.
- Diversity, inclusion and non-discrimination: recruitment processes and working environments must be inclusive, promoting diversity based on a cross-cutting, global, social and committed agenda, and free from discrimination and any abusive or hostile conduct involving personal harassment. The company has a zero-tolerance policy towards discrimination on the grounds of race, nationality, social origin, age, gender, marital status, sexual orientation, ideology, political or trade union opinions, beliefs,

cognitive and/or physical ability, religion or any other personal, physical or social factor; as well as workplace harassment, whether sexual or of any other kind.

- Recruitment and labour migration practices: based on the commitment to respect and monitor the human rights of the particularly vulnerable group of migrant workers, the necessary measures must be taken for their protection, ensuring: absence of recruitment fees of any kind throughout the recruitment process or employment relationship between workers and recruitment agents, absence of any form of deception, coercion or omission in the contracts and recruitment process, ensuring at all times that workers understand the contracts and their terms and conditions, as well as making sure that workers have access to their visas and identity documents at all times, without withholding these documents more than strictly necessary. Workers should be free to terminate the employment relationship at any time without being subject to any kind of penalty.
- Occupational health and safety: workers must be equipped with the necessary personal protective devices and have a safe working environment to carry out their tasks in optimal health and safety conditions. The occupational risk prevention measures and policies at all operational levels must be constantly updated, comprehensively managed and understood by the workers, while the applicable regulations must be rigorously complied with. Health insurance schemes should also be implemented if they are unavailable or inoperative in the territories of activity, together with occupational accident coverage for workers. A zero-accident rate target should also be set.
- Accommodation and living conditions: where workers are provided with accommodation, they must be guaranteed decent living conditions, safe and clean facilities, access to safe drinking water and personal hygiene, communications, electricity and sanitation services, always ensuring they have sufficient personal space and privacy, as well as freedom of movement.
- Freedom of association, assembly, the right to organise and collective bargaining: the unhindered exercise of freedom of association and the right of association of workers must be promoted, respected and protected, recognising their freedom to establish, join, organise, or belong to trade unions. The right to strike, which must be guaranteed in countries where legislation does not provide for it, and the right to collective bargaining must be promoted and defended, protecting, without

interference, the freedom of operation of workers' organisations based on their statutes and rules.

- Promoting work-life balance: the right to holidays, rest and work-life balance must be respected, as well as implementing actions focused on the physical and emotional wellbeing of all employees.
- Equal opportunities: the professional and personal development of all employees must be promoted, ensuring equal opportunities through its policies for action. The selection and promotion of employees must be based on the objective criteria of merit and abilities, ensuring equal pay for work of equal value.
- Education and training: training initiatives must be pursued to train and upskill employees so that they can perform their jobs safely, grow and adapt to different needs in the course of their duties, and be aware of their rights and obligations in terms of human rights in the workplace.

3.2 Commitments to consumers and end-users

Consumers and end-users are defined as any individual who uses the Group's products and services to meet their own needs.

The ACS Group endeavours to conduct its business in a professional and efficient manner, addressing the needs of consumers and end users, and focusing on excellence and quality of service, by strictly applying the following principles and commitments:

- Protection of data privacy and confidentiality of information: adequate processing of consumers' and users' personal data must be ensured, particularly the right to personal data protection, as well as the right to secrecy of all confidential, privileged, personal and reserved information held by the company, in accordance with current law.
- Quality, accessibility and safety of services: services must be safe and accessible for everyone, including people with functional diversity, both in terms of how and where they provided, always responding to the needs of society. Accident and emergency response plans must also be prepared to guarantee the safety of users and the community, ensuring that these plans are duly explained to the various users who have access to these services and guaranteeing adequate information and signage arrangements.

- Responsible development of products and services: the design of products and services must be based on sustainable criteria, prioritising social or environmental contributions, integrating the needs of consumers, users and society in general, taking into account diversity and inclusion criteria, and considering the product or service's life cycle as a whole, applying control and due diligence processes from conception to supply and delivery.
- Non-discrimination: any kind of discriminatory treatment in relations with consumers and users must be rejected, particularly on the grounds of race, nationality, ethnic origin, religion, gender, sexual identity and/or orientation, marital status, age or disability. End users must also be guaranteed access to the company's services through access to services and facilities for people with functional diversity.

3.3. Commitments relating to the environment and local communities

The ACS Group embraces the commitment to protect local communities and the environment, contributing to preserving resources and habitats in all its operations and respecting communities' rights to live in a clean and healthy environment with decent quality of life. Local communities are defined as individuals and groups within society who are likely to be affected by the Group's activities.

The ACS Group therefore undertakes to carry out its activities in accordance with:

- Respect for the rights of minorities and indigenous peoples: the rights of indigenous peoples, ethnic, religious and linguistic minorities, persons with disabilities and migrant workers and their families must be respected beyond what is required by local laws, in compliance with corporate values and international standards. Likewise, cultural, historical and religious heritage sites must be protected, avoiding any involvement in damaging or destroying them or interfering with their free access by local or indigenous groups. Similarly, local and indigenous communities must have unhindered access their means of livelihood If there are local or indigenous peoples in the area (including informal settlements), before engaging in activities on a property, it is important to ensure that their right to free, prior and informed consultation (and consent, at least in the case of indigenous peoples) has been respected, avoiding any occupation and/or exploitation of land that would require the eviction/displacement of the communities traditionally residing there; and when unavoidable, measures should be implemented for fair and prompt consultation, settlement and compensation agreements.

- Right to a clean and healthy environment: pollution prevention measures must be in place, especially for the protection and sustainable use of air, soil and water in the areas where the business operates, avoiding impact on the health of the community or reducing living standards. This will ensure the conservation of natural resources and habitats while respecting the communities' right to live in a clean and healthy environment with a decent standard of living. To this end, the company's policies are geared towards improving quality of life and health of the societies where it operates, as well as combating climate change and promoting the circular economy.
- Tax accountability and rejection of corrupt practices and bribery: there should be processes in place to identify and resolve cases of corruption, fraud, bribery and conflicts of interest, repudiating any such practices in the course of operations. Business must also be conducted with fiscal and financial integrity, in an open and transparent manner, protecting the public budget and the interests of users, consumers and society, and rejecting all forms of money laundering. Likewise, any practices aimed at unduly interfering with anyone's free access to a fair legal process in the course of business are also unacceptable..

4 IMPLEMENTATION AND MONITORING OF THE POLICY

To ensure that the commitments adopted in this Policy are applied throughout the global value chain, the ACS Group is committed to following the procedures defined in its Corporate Protocol on Due Diligence in regard to Human Rights, which is publicly accessible on the Group's website.

The protocol continuously implements measures and processes based on criteria of proportionality and probability to identify, prevent and mitigate actual and potential adverse human rights impacts throughout the business and global value chain, delivering, where appropriate, effective redress in cooperation with affected stakeholders. These procedures and their results are regularly monitored and audited to ensure their correct functioning and results, engaging interest groups by encouraging their participation in the continuous review and adaptation of the procedures.

To ensure compliance with these commitments across the value chain, business partners will be given contractual guarantees to ensure that these procedures are established and deployed.

The Group is committed to assigning human rights due diligence responsibilities for cross-cutting integration in all its direct operations and value chain, as well as promoting

due diligence by providing human rights training plans for employees throughout the global value chain.

This Policy is clearly communicated and disseminated internally and externally to all stakeholders, in particular employees and business partners, and also made publicly available on the Group's website.

5 WHISTLEBLOWING AND COMPLAINTS CHANNELS

All members of the ACS Group and its global value chain who have knowledge or well-founded suspicion of any breach of the commitments acquired in this Policy must report it through the channels provided for this purpose.

Besides the ordinary channels, the ACS Group also allows this kind of reporting through alternative means, including access to straightforward technological platforms or by telephone. The ACS Group has dedicated channels for this purpose throughout its various divisions.

Any queries that may arise from the practical application of the conduct guidelines can be addressed through any of the ACS Group's channels. In any case, they are handled under the principles of trust, impartiality and protection of the reporter. ACS Group companies must promote awareness and use of these channels, protecting bona fide whistleblowers against negative consequences from using them.

Any complaint included in the ACS Whistleblowing Channel Operating Policy may be submitted through one of the channels detailed below:

- Ordinary channels:
 1. Direct supervisor or a member of ACS management;
 2. Compliance Committee member;
 3. Regulatory Compliance Department.
 4. Whistleblowing Channel.

This last channel is publicly available to express concerns or address, report, complain, and voice any conduct or facts relating to breaches of the human rights principles contained in this Policy, as well as in other internal and external regulations in any of the Group's companies and its global value chain. Complaints submitted through this channel are handled by the Compliance Committee.

ACS Group's Whistleblowing Channel can be contacted:

- By post:

ACS Group Whistleblowing Channel

Avda. Pío XII 102, 28036 Madrid, Spain.

- Through the corporate website
<https://www.grupoacs.com/compliance/canal-etico/> .
- Through a 24/7 telephone service, at the following numbers:

<u>Country</u>	<u>Telephone number</u>
Spain	900 876 841
United States of America	833 7781 528
Canada	833 7781 528
France	0 800 99 08 46
United Kingdom	0 800 077 3019

This Channel is governed by principles of confidentiality, respect and substantiated grounds, with full respect for the rights and guarantees in the process, both in the analysis and verification of reports received and in the resolution and, where appropriate, adoption of corrective measures when necessary.

The ACS Group guarantees that no retaliation will be taken against the whistleblower by line superiors or any other person involved in the alleged facts, together with the confidentiality of the complaint and the right to privacy, reputation and self-image of all those who participate or are directly or indirectly involved in the actions established in the procedure.

- Alternative channels:

The online channels accessible through the website and mobile application, as well as the 24/7 telephone channel, which are listed on the website www.grupoacs.com.

6 ENFORCEMENT AND UPDATING OF THE POLICY

The Audit Committee will oversee compliance with the Company's policies and rules on environmental, social and corporate governance matters, as well as with the internal codes of conduct, including this policy.

The various ACS Group companies will be responsible for carrying out due diligence processes in the performance of their activities in accordance with the guidelines of the Corporate Protocol on Due Diligence in regard to Human Rights.

The Organisation has developed the following tools and procedures for monitoring and evaluating the Human Rights Policy:

1. The Corporate Protocol on Due Diligence in regard to Human Rights.
2. The Corporate Guidelines for the Protection of Human Rights.
3. The ACS Group's Positioning Framework on Human Rights.
4. The Human Rights Risk Analysis based on infringement potential.

Likewise, the ACS Group will review and update this Policy, incorporating the results of the assessments envisaged in the ongoing due diligence and stakeholder feedback processes, as well as ensuring the improvement and reinforcement of its human rights strategy throughout the Group's sphere of influence.