
Code of Ethics and Conduct

Approved by Board of
Directors of the FCC Group
on February 27th 2018



FCC's vision defines the future to which we aspire and brings purpose to our actions. We all share the same culture and support the same project: one FCC.

Vision

Be a benchmark international Group in the Citizen Services field, offering comprehensive and innovative solutions for efficient management of resources and to improve infrastructure, while helping to enhance citizens' quality of life and contributing to the sustainable progression of society.

Mission

Design, implement and manage, in an efficient and sustainable manner, environmental services, end-to-end water management and major infrastructure construction works, to improve the lives of citizens.

Values

Results-orientated approach

We pursue improvement and endeavour to achieve goals, seeking to position the FCC Group as a benchmark for profitability and competitiveness.

Honesty and Respect

We want to be recognised as acting with honesty and integrity, earning the trust of our collaborators, clients and providers as preferential long-term partners.

Diligence and Professionalism

We are scrupulous in our work and orientated towards customer service, nurturing our teams' capacity to seek efficient and innovative solutions.

Loyalty and Commitment

We favour diversity, advocate professional development and acknowledge achievement and creativity as a driver of productivity and progress.

Community welfare and development

We are aware of the value our services bring to society and are committed to protecting the natural environment, and to the development and welfare of the communities in which we operate.

Our Code of Ethics and Conduct provides practical examples of the shared values across the FCC Group, encourages a stronger culture of compliance and supports the creation of long-term value for our project.

Application of the content of the Code may under no circumstances breach applicable legislation. Were such a situation to arise, the content of the Code would be adapted in line with the legal provisions.

The Code shall prevail over any local internal rules and codes of conduct that may be contradictory to it, except where such regulations impose more stringent conduct requirements. Specific adaptations shall be allowed for countries in which the FCC Group operates, subject to consultation with and authorisation by the Response Committee.



The FCC Group Code of Ethics and Conduct

The purpose of the Code of Ethics and Conduct is to encourage all persons having links with any FCC Group company to observe the most stringent conduct guidelines in their commitment to complying with laws, legislation, contracts, procedures and ethical principles.

Compliance with this Code is mandatory for all persons related to any FCC Group company, irrespective of the type of contract or agreement that defines their labour relationship, the position they hold or the geographical location in which they carry out their work.

The conduct guidelines contained in this Code of Ethics and Conduct also apply to all investees and entities over which FCC exercises control in their management. Furthermore, the FCC Group will encourage its investees, even those it does not control, and its providers, contractors, collaborators and other partners to adopt principles and values similar to those set forth in this Code.

Ethics and compliance model

The FCC Group's ethics and compliance model is aimed at preventing and detecting risks associated with non-compliance, including those relating to criminal offences, and minimising the potential impact of such risks. This Code constitutes the highest level guideline of this model and is expressed through policies, procedures and internal controls that are regularly reviewed and updated.

For the purpose of rolling out this model to the Group's activities, risks are analysed periodically, responsibilities and expected conduct are defined and employee training resources are assigned. Processes are also in place to assess compliance and ethical corporate culture, and to detect, report and address potential irregularities.

The Board of Directors is responsible for approving both the Code of Ethics and Conduct and the Compliance Model and, ultimately, for ensuring an ethical corporate culture, with the assistance of the Audit and Control Committee. Overseeing compliance with this Code, and application of the Compliance Model in general, will be the remit of the Compliance function, which will report to the Audit and Control Committee and be supported by the Response Committee and Internal Audit.

The FCC Group applies the principle of oversight to drive compliance with applicable internal and external regulations and to prevent, detect and eradicate conduct that is irregular, inappropriate or contradicts such regulations.





Principles of ethics and compliance

- You are required to know the legislation in force and apply this in your work.
- You are required to apply the Code's guidelines to your individual conduct, encourage their application throughout the organisation, contribute to generating a culture of compliance, and prevent and correct any conduct that contravenes the Code.
- You are required to report to the Whistle-blowing Channel any conduct that comes to your attention that you believe to be contrary to the Code.



Principles of compliance

We respect the legislation in force and abide by the rules

We are committed to carrying out our business and professional activities in accordance with the legislation in force, wherever we engage in such activities.

We display exemplary conduct

Our practices safeguard the reputation of the FCC Group and exemplify ethics, diligence, professionalism and honesty.

We are diligent and accountable for our actions

We apply a standard model of ethics and compliance based on oversight, with a view to preventing, detecting and eradicating irregular conduct.

Within the FCC Group we understand that applying the principle of oversight as regards ethics and compliance includes assessing the ethics and compliance models of the third parties with which we have links.

We report irregularities

We bring any incidents or irregularities of which we are aware to the attention of the organisation using the channels in place for this purpose.

Honesty and respect

1. We respect legislation and ethical values
2. We observe a zero tolerance policy with respect to bribery and corruption
3. We prevent money laundering and the financing of terrorism
4. We safeguard free competition and best market practices
5. We exemplify ethical conduct in the securities market
6. We avoid conflicts of interest

Diligence and professionalism

7. We are diligent in terms of control, reliability and transparency
8. We safeguard the reputation and image of the Group
9. We use the company's resources and assets efficiently and safely
10. We oversee the ownership and confidentiality of data and information

Loyalty and commitment

11. Our clients are the focal point
12. The health and safety of people are paramount
13. We promote diversity and fair treatment
14. We are committed to our environment
15. We are transparent in our relations with the community
16. We extend our commitment to our business partners



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We respect legislation and ethical values

1

Regulatory compliance is always our starting point

At the FCC Group we are committed to carrying out our business and professional activities in accordance with the legislation in force and the company's rules and procedures, wherever we operate.

Respect for the dignity of individuals and their basic rights is a cornerstone of the FCC Group's conduct

All FCC Group employees are required to support this principle, carrying out our professional activities with absolute respect for, and guaranteeing, human and civil rights.

Honesty and respect for legislation and the rules of the company must be a permanent feature in the day-to-day conduct of all Group employees, and particularly of Group management

Conduct that is concordant with the company's values is one of the criteria used in the recruitment and appraisal of Group employees and when applying disciplinary measures, should the need arise.

Be mindful of the following in particular

The FCC Group fosters a relationship of reciprocal cooperation with the authorities of the countries in which it operates. All of the FCC Group's activities must satisfactorily meet their requirements, including tax and social protection obligations, ensuring that state grants, subsidies, and other funds extended to the Group are used solely for the purpose for which they were awarded, and are applied diligently.

In addition to complying with the legislation in force, compliance with the FCC Group's policies and rules is also mandatory. These incorporate the requirements of the voluntary principles to which the Group has committed, such as the United Nations Global Compact or the Declaration on Fundamental Principles and Rights at Work and other Conventions of the International Labour Organisation.

We observe a zero tolerance policy with respect to bribery and corruption

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Zero tolerance

The FCC Group does not tolerate corruption, the giving or receiving of bribes, or any form of extortion. It is prohibited to influence the will of third parties in order to gain an advantage, preferential treatment or a guarantee of obtaining benefits for the company, yourself or others, through any type of payment or consideration, whether monetary or in kind, either directly or via third parties.

Relations with clients, providers, partners, collaborators and persons or entities that have, have had or could have business in common with the FCC Group, must be conducted by authorised persons and respect the limits stipulated in this Code.

Giving and receiving of gifts and invitations

No gifts other than the customary business courtesies or token offerings may be given, and under no circumstances may the purpose of any such gift be to receive preferential treatment in any activity that may be linked to the FCC Group.

The requesting or acceptance of gifts, payments, commissions or any other items for personal benefit is not permitted, whether from current or prospective clients, or from providers or persons related, or seeking to be related, with the Group, or from those acting on their behalf. This encompasses the rendering of personal services, offers of work, travel, preferential treatment, special discounts and any other item of value.

Be mindful of the following in particular

Gifts and invitations

The rules laid down in this Code aim to be flexible so as to take into account the different customs and practices of the various locations worldwide in which the company carries out its business, and sufficiently objective to provide useful guidance. This approach allows for the acceptance or giving of promotional gifts, customary business courtesies and token offerings provided all of the following circumstances are present:

- They are not prohibited by law.
- They cannot be considered inappropriate or unprofessional.
- They must be given or received in a transparent manner and only occasionally, and must respect commercial practices and generally accepted social courtesy norms.
- They must have a fair value. Generally speaking, gifts that do not exceed 150 euros in value, or the equivalent in the relevant currency, are deemed to have a fair value. When calculating the amount, all gifts and courtesies received from or given to a third party in a six-month period shall be taken into account.
- They may not be in the form of monetary amounts, securities or items that are readily convertible to cash.
- They must not be accepted or given if they may be perceived as intended to influence professional decisions, in view of the timing or for other reasons.
- They must not have been requested.

Lunch invitations and invitations to sporting, cultural or training events

In general, invitations to lunches and events are acceptable if they are reasonable. Those not exceeding 75 euros per person are generally considered reasonable, taking into account the location, context and nature of the event, and provided they are consistent with the guiding principles.

Attendance at seminars and activities of a purely training-orientated nature are not deemed to be personal benefits, unless the cost, location, context or extras are not suitable for purpose.

We are always on the alert to prevent unlawful activity

At the FCC Group we are especially diligent as regards compliance with legislation relating to money laundering and/or the financing of terrorism.

As a rule, the FCC Group does not allow cash payments and receipts. Any exception must be duly documented and authorised, be for a small amount, which must in any case be less than 2,500 euros for payments to third parties, and respect local legislation in force on the matter.

For those jurisdictions and activities in which the FCC Group is subject to supervisory and reporting requirements, the due diligence measures implemented must comply with legal provisions on the matter.

Pay particular attention to the following

- The effective identity of the third party we will be working with: client, partner, provider, ONG, etc.
- The origin of the funds we receive as payment.
- Payments received in instalments or structured to avoid any of the registers or systematic reporting in place under the applicable legislation on the prevention of money laundering and terrorist financing.
- Payments that may directly or indirectly be used, in part or in their entirety, to engage in terrorist activities.
- Payments that may not have a commercial purpose or for which there may be no reasonable explanation.
- Payments to and receipts from bank accounts, persons or entities resident in tax havens.

We safeguard free competition and best market practices

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Our aim of being a point of reference in the market is a responsibility, not just an advantage

We abide by the rules and principles of free competition in all of the markets in which we operate. We act with loyalty, avoiding any conduct that constitutes or could constitute collusion, abuse or restriction of that freedom.

The FCC Group prohibits conduct that could hinder the development and continuity of effective competition.

We avoid any conduct that could entail price abuse or manipulation.

Under all circumstances avoid the following

- Abuse of power or a dominant market position.
- Conversations and agreements with competitors who are seeking to coordinate their market activity.
- Fraud in tenders, including the decision as to which parties should be invited to submit a tender and which should be excluded, the terms and conditions of their proposals, price-setting, and any exchange of information regarding the foregoing terms which takes place in conditions that exclude third parties.
- The use of advertising that is misleading or could place the products of competitors and the companies that manufacture them in unfounded disrepute is expressly rebuked.

Access to information having market impact entails restrictions and responsibilities that you must be aware of and respect

The FCC Group has internal regulations that are consistent with the obligations laid down in securities market legislation. Employees and other persons related to the FCC Group who are subject to such internal regulations must conform to the restrictions on the use of privileged information to which they have access through their professional activity.

Privileged information is understood to be any specific information that has not been made public and which, had it been publicised, could have, or would have had, a significant influence on the listed price of marketable securities or financial instruments that fall within the scope of application of the Securities Market Law, or on the issuers thereof.

Pay particular attention to the following

- When liaising with third parties, safeguard any information that could affect the listed price of any of the FCC Group companies or other firms.
- Safeguard sensitive information and do not share with third parties any material information that is not publicly available, either for your own personal benefit or for the benefit of related persons or third parties, or with the intention of changing the markets.
- Do not operate with assets and securities on which you have privileged information.

Duty of loyalty

In carrying out our professional duties, we must act with loyalty and defend the interests of the FCC Group, avoiding any situations that could give rise to a conflict between our own personal interests and those of the Group. FCC employees are not permitted to act in the interests of personal benefit, either present or future, whether their own or that of related persons, when executing their remit or responsibilities.

Board Members and Administrators must also know and apply the commercial legislation and the Regulations of the Board of Directors in terms of conflicts of interest and in the application of the duty of loyalty in relation to related transactions.

The following cases could give rise to conflicts of interest and require you to consult via the whistle-blowing channel:

- The employee is involved, either directly or through a related person, in any financial transaction or operation with Group companies.
- The employee has the capacity to make decisions on, negotiate or execute contracts on behalf of any of the Group companies with related persons or legal persons in which the employee, either directly or through a related person, has financial or personal interests.
- The employee is a significant shareholder, director, board member, executive, etc., whether directly or through a related person, of a client, provider or competitor, either direct or indirect, of any of the Group companies.
- The employee is required to supervise the work or performance of related persons.
- The decision-maker in a tender is a related person.

- In an audit or a review by a regulator or supervisor, the team leader or a team member is a related person.
- Persons related to an employee of the FCC Group are not permitted to apply for a position that reports, either hierarchically or from a functional perspective, to a member of their family.
- Access to hierarchically or functionally dependent positions of a family member is subject to the employment policy of family members in the company and must be authorized by the Human Resources Department.

The following are related persons:

- The employee's spouse or domestic partner.
- The parents, children and siblings of the employee or of their spouse (or domestic partner).
- The spouses or domestic partner of the employee's parents, children and siblings.



Diligence and professionalism

7. We are diligent in terms of control, reliability and transparency
8. We safeguard the reputation and image of the Group
9. We use the company's resources and assets efficiently and safely
10. We oversee the ownership and confidentiality of data and information

We are diligent in terms of control, reliability and transparency

7

The FCC Group's information must be as reliable as possible, it must comply with applicable legislation and company rules, and must be diligently safeguarded and archived

We are responsible for carrying out our duties in accordance with the rules and procedures of the company, so that we can be accountable for our actions at any given time.

Transparency is a fundamental principle for the FCC Group. All of our employees are required to collaborate with internal and external control areas, supervisors, regulators, and administrative or legal authorities, addressing their requests and requirements, and quickly and accurately providing the information they need on aspects within our remit.

Pay particular attention to the following

All transactions, income and expenses are to be appropriately accounted for, recognised and documented in their entirety as and when they arise, without omitting, concealing or altering any data or information, such that the accounting and operating records give a true and fair view of the actual situation and can be verified by the control areas and by the internal and external auditors.

Failure to follow these guidelines could be considered fraud.

Evading the company's internal controls will result in a penalty.

We safeguard the reputation and image of the Group

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We are all responsible for safeguarding the image and reputation of the FCC Group

Media relations with the FCC Group and its employees are to be conducted solely by the Communications, Corporate Marketing and Brands department.

Employees must refer any calls, requests for information, questionnaires or similar approaches from the media to this department.

Should you need to contact the media during the course of your work, you must inform Communications, Corporate Marketing and Brands so that this department can make the appropriate arrangements.

Pay particular attention to the following

- Information on the FCC Group's results and business performance must always be managed by the areas and bodies charged with investor relations.
- No information published via the FCC Group's internal channels may be published in external media without the authorisation of the Communications, Corporate Marketing and Brands department.
- Only the Communications, Corporate Marketing and Brands department is authorised to set up social media accounts - websites, blogs, etc.- for FCC.
- Only those employees who have been granted express authorisation may post information or opinions via the FCC Group's social media accounts, and they must apply the internal rules of conduct and act respectfully when doing so, using good judgement and common sense, choosing the information they share carefully (*).
- In your own personal use of social media, you must not refer to your employee status or make any other reference whereby the published content could be attributed to the FCC Group.
- Only use the corporate identity (logo, brand) and the FCC Group's name to enable you to carry out your professional activity satisfactorily, and in accordance with the internal guidelines on brand usage (*).

(*) Where there is no specific rule, consult the Communications, Corporate Marketing and Brands department

The company's assets must be safeguarded and used responsibly and efficiently

The FCC Group provides its employees with the necessary means and resources to enable them to carry out their professional activity. These must be used efficiently and in accordance with internal regulations, and the necessary measures must be taken to prevent their loss or theft, or any damage or deterioration thereto.

The FCC Group has a [Code for the Use of Technology Resources](#). All employees are required to consult this Code to ensure they are making appropriate, lawful and responsible use of such resources, which include IT tools and e-mail.

We are all accountable and are responsible for acting with due diligence. We cooperate with the Administration and Audit departments in their monitoring and control of the use of these resources when they so require.

Pay particular attention to the following

- Safeguard the company's assets and reputation.
- Comply with the regulations on physical and information security, immediately reporting any security breach, suspected attack, manipulation or unlawful use you may observe.
- Note that any information created, received, sent, downloaded, stored or processed by any means may be accessed, reviewed, copied, recorded or deleted by the FCC Group in accordance with the approved internal procedures.

We oversee the ownership and confidentiality of data and information

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We are all obliged to safeguard information and data to prevent unauthorised access

As employees of the FCC Group, we often handle confidential information of an economic, financial, technical, personal, business or administrative nature (hard copies or in digital format), which is of great value to the Group and is subject to intellectual property and data protection laws in the jurisdictions in which we operate.

Anyone working for the FCC Group is required to comply with the company's current rules on Information Security and Data Protection, and to respect the measures in place within the Group to prevent external parties and employees from accessing such information and/or data without authorisation.

Remember that the duty of confidentiality remains in force even after your relationship with the FCC Group has ended.

Pay particular attention to the following

Information that is the property of the company must only be used for work-related purposes.

Software usage must always be in accordance with the licence terms and conditions and must not infringe third-party rights.

All passwords are the property of the company.



Loyalty and commitment

11. Our clients are the focal point
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Our clients are at the heart of our activity. We therefore endeavour to forge long-lasting relationships that are based on mutual trust, honesty and professional responsibility, and which bring added value to our clients

We focus our efforts on getting to know our clients, offering products and services that meet their needs, pursuing excellence and prioritising customer satisfaction in our service offering.

We devise, design and market products and services of the highest quality, bringing value to our clients that sets us apart with respect to other market offerings.

We encourage commitment to innovation.

We are fair in our client relations

We describe the characteristics of our products and services transparently, providing information that is thorough, true, complete and easy to understand.

We respect the commitments undertaken and act with integrity.

Achieving our goal of zero accidents is everyone's responsibility

Occupational health and safety is a distinguishing factor for the FCC Group, and an essential requirement in protecting the health and safety of our employees and collaborators. The FCC Group has a strategy and specific occupational health and safety action plans in place for each of its businesses that are consistent with the legislation in force in each country.

All employees are required to comply and ensure compliance with the health and safety regulations and the rules regarding the use of personal protective equipment.

Pay particular attention to the following

Do not take risks that could jeopardise anyone's physical integrity or their health. Strictly comply with the health and safety regulations for your own protection and that of other employees and third parties.

Use the equipment assigned to you responsibly, especially when carrying out high-risk activities, and encourage compliance with risk prevention practices.

Working under the influence of alcohol or drugs is prohibited. Consult the medical service if you are taking medication that could affect your safety as you carry out your work.

The FCC Group is committed to generating a healthy living culture through initiatives aimed at promoting physical exercise and healthy eating, prompting employees to look after their health and well-being, and encouraging adoption of healthy habits, thereby reducing accident rates and absenteeism.

We aim to create a fair and diverse working environment that fosters professional and personal development

Fair treatment is a guiding principle. The Group devises programmes, internal procedures and initiatives aimed at creating an enriching working environment that is free from discrimination of any kind and favours diversity.

When hiring and promoting employees, the FCC Group always bases its decisions on achievement, and on objective and transparent appraisals.

We do not tolerate

- Direct or indirect discrimination in view of gender, race, age, nationality, religion, sexual orientation, disability, family origin, language, political ideology, membership of a political party or trade union, or any other factor that bears no objective relationship to working conditions, whether or not this is provided for in applicable legislation in the pertinent jurisdiction;
- Mobbing or sexual harassment.

Our mission includes working towards sustainable development, and we therefore endeavour to make efficient use of resources and minimise our environmental impact

The FCC Group operates under the following premises:

- Efficient use of resources.
- Prevention of negative environmental impacts, and protection of ecosystems and historical, cultural and archaeological heritage.
- Reduction of greenhouse gas emissions.

We strictly comply with environmental legislation and act according to a principle of prevention

The FCC Group cooperates with the regulatory authorities to develop and foster laws and fair regulations to protect the environment. It also executes and collaborates on environmental protection projects. Employees may not liaise with any agency, civil servant or government representative, the media or the authorities without the authorisation of the pertinent Group department.

Be mindful of the following in particular

Familiarise yourself with the FCC Group's Environmental Policy and encourage its application within the scope of your functions, and demonstrate your commitment to the criteria of respect and sustainability it embodies. Adopt best practices to make a positive and effective contribution to the achievement of objectives. Endeavour to minimise the environmental impact of your activities and of the use of the facilities, equipment and work resources at your disposal, and seek to use them efficiently.

Help to promote best practices in the companies with which we collaborate, sharing your knowledge, being constantly vigilant, and enhancing the implementation of the different activities in which they take part. Insist on compliance with the environmental requirements that are applicable in each case.

When in doubt, be cautious

Conserve natural areas

If your work at the FCC Group involves you in urban development, building or land transformation projects, be sure that these respect the cultural, historical, artistic and natural heritage that could be affected.

Seek efficiency

As a guideline, minimise waste and pollution, conserve natural resources, and promote energy savings and emissions reduction.

Investments in the community must be transparent and adequately documented

The FCC Group invests in the development of society and citizens, transparently promoting and financing a range of initiatives and projects to meet relevant social needs through our Corporate Social Responsibility Policy.

The sponsorships, collaborations and donations undertaken by the FCC Group will be extended, observing objective criteria associated with its activities, to prestigious and ethically minded entities that have a suitable organisational structure to guarantee the correct administration of such resources.

Any collaboration or sponsorship, including those accorded in kind, must be duly authorised, documented and, wherever possible, monitored to ascertain the ultimate purpose or the use made of the contribution.

Making donations to political parties or candidates is not permitted

It is strictly prohibited for Group companies to make donations or extend loans or advances, either directly or indirectly, whether in their own name or through intermediaries, to public officials or candidates, or to political parties, including federations, coalitions, temporary electoral formations, foundations and entities related thereto.

All sponsorships and donations must be authorised

Investments in the company: sponsorships, collaborations, donations and voluntary work must be authorised by the Communications, Corporate Marketing and Brands department.

This includes any services rendered as well as the granting of facilities, services or products to clients or providers.

We extend our commitment to our business partners

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In our relations with providers, contractors, partners and collaborators, we seek to establish a balanced and transparent collaboration framework that fosters stable, long-lasting business relationships which maximise the benefits for all parties

At the FCC Group we share our commitment to ethics and compliance by promoting up-to-date workplace health and safety practices and encouraging collaborations with those who conform to advanced social, environmental and ethical standards. They may do this by adhering to this Code, including specific clauses in contracts or having compliance models in place that are compatible with that of the FCC Group.

Our partners, collaborators and providers are required to

Demonstrate ethical conduct in their business relations and openly reject corruption, bribery and fraud.

Protect human rights and the fundamental labour rights acknowledged worldwide in the Universal Declaration of Human Rights and in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and its other Conventions.

Display a high level of commitment as regards meeting workplace health and safety standards, guaranteeing a safe and healthy working environment and proactively implementing measures that help to minimise workers' exposure to risk.

Respect the environment in all of their activities, not only by complying with legislation, but also by undertaking their activity in such a way as to minimise the negative environmental impact and engaging in sustainable environmental management. Specifically, when providers conduct their activity at the FCC Group's premises, they should ensure their employees are aware of and comply with the applicable internal and external environmental regulations.

We will undertake due diligence procedures for the purpose of complying with these principles, taking into account ethical aspects, as well as the professional and financial suitability of the parties with whom we do business.



What we expect of everyone working at the FCC Group

The FCC Group will not tolerate any manner of non-compliance with the Code of Ethics and Conduct. No employee, no matter what their grade or position, has the authorisation to request that another employee breach the guidelines set forth in the Code.

Failure to comply with this Code could give rise to disciplinary measures in accordance with labour legislation, in addition to any legal liabilities that may apply.

Know, understand and apply the conduct guidelines laid down in this Code, as well as the policies and procedures that develop and expand on those guidelines

This Code does not encompass all situations that may arise, but it does lay down clear conduct guidelines. Your obligation is to apply the principles that gave rise to the Code in every decision you make. If you are in doubt over any particular case, you should consult the Response Committee and/or the Compliance function.

Consider the following before making any decisions:

Does it infringe any laws or regulations?

Does it go against the values and policies of the FCC Group?

If my conduct were made public, would it be considered inappropriate or unprofessional?

Always be cooperative and responsible with regard to identifying situations of actual or potential non-compliance with the ethical principles and rules of conduct contained in this Code.

Prevent misconduct. It is your obligation to report through the Whistle-blowing Channel any inappropriate conduct you hear of or witness

Whistle-blowing Channel

The Whistle-blowing Channel is a tool available to all employees, to assist in identifying potential non-compliance with or breaches of the Code of Ethics and Conduct and the associated regulations, and to anticipate potential weaknesses with a view to reinforcing the culture of compliance within the FCC Group. You may also use it for consultations and to make suggestions aimed at improving internal control.

Communications through the Whistle-blowing Channel are received and processed by the Response Committee and confidentiality is guaranteed.

The Response Committee is formed by corporate directors from Human Resources, Internal Audit, Compliance, Legal Services and Corporate Responsibility.

Investigation

The Response Committee investigates all reports promptly and diligently, recommending the appropriate measures to resolve the issue. Information is analysed applying objective and unbiased criteria.

Anti-retaliation measures

It is strictly forbidden to take any measures whatsoever against a Group employee as retaliation for having reported an irregularity.

False reports

Appropriate disciplinary measures will be adopted when internal investigation finds that an irregularity has been reported falsely and in bad faith.

You may report any potential infringement of the Code of Ethics and Conduct or the associated regulations using the following channels:

E-form: This channel is available on the corporate Intranet and allows for attachments to be uploaded. Confidentiality is guaranteed from the outset.

Click here to access:

<http://fccone.fcc.es/web/fccone/canal-etico-fcc>

E-mail: canaletico@fcc.es
denunciaacoso@fcc.es

Click here to access:

Harassment Prevention and Eradication Protocol

Post:

Apartado de correos 19312
28080 Madrid
Spain

Solemn declaration Informed and in agreement

The employees are periodically required to sign a solemn declaration undertaking to abide by the Code of Ethics and Conduct of the FCC Group.

By signing this declaration, I hereby certify that:

I am aware of and have read the FCC Group Code of Ethics and Conduct.

I understand the obligations, prohibitions and conduct guidelines set forth therein.

In my professional duties, I act in accordance with its principles and values, and comply with the provisions thereof.

I collaborate with the Compliance function in applying the Code of Ethics and Conduct.

I am aware that the FCC Group has a procedure in place for reporting non-compliance and that it is my obligation to report through this procedure any instances of non-compliance that come to my attention.

I collaborate to instil a culture of compliance, I lead by example and I encourage the channelling and resolution of doubts regarding the Code of Ethics and Conduct.

NAME

SIGNATURE

DATE



The Code of Ethics and Conduct is updated periodically to take into account new regulatory requirements, improvements arising from compliance reviews and best practices. Visit the FCC Group's website (www.fcc.es) and Intranet to consult the current version.

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