

Sustainability policy

Approved by FCC's Board of Directors on 26 April 2022

1. Fundamentals

FCC aims to be recognised as a citizen services company committed to the development of the societies it serves and through the activities, goods or services it provides.

A one-hundred-year-old corporate culture with solid values have made it possible for FCC's businesses to grow on the basis of long-lasting, transparent and mutually-beneficial relationships with those stakeholders with which the Group interacts.

The Board of Directors approved the Corporate Social Responsibility Policy on 28 July 2016.

FCC's Board of Directors decided to reformulate the first policy for several reasons, such as the drift of the CSR concept towards sustainability, the impulse given by the European and national legislator on these matter, the new environmental, social and governance requirements set forth by customers, investors and analysts, together with the demand for sustainable criteria for financing and the Group's reformulation of its values and principles of action.

The new policy also brings an update of the FCC Group companies' commitments associated with the framework of integrity and business ethics, respect for the environment and in relation to the contribution of value to society.

Its framework of action presides over the development of the FCC Group's business activities in the markets in which it operates.

FCC's Sustainability Policy is an integral part of the commitment and actions of all of the Group's professionals, in line with the demands of customers and society as a whole.

II. Principles of action of the FCC Group

The shared values of the FCC Group aim to transmit and instil the principles of action to all of the company's employees. These are our company's most important signs of identity, aimed at offering global and innovative solutions for the efficient management of resources and the improvement of infrastructures, contributing to increase the quality of life of citizens and the sustainable progress of society.

The principles of action are aimed at encouraging everyone working for and collaborating with any FCC Group company to follow the guidelines for behaviour with the highest possible levels of excellence and thoroughness, showing the commitment to observe the laws, regulations, contract terms and conditions, and ethical procedures and principles.

The company's values, which guide the principles of action and which all Group employees connected to the common goals, are as follows:

Honesty and respect

We want to be acknowledged for being honest and trustworthy, deserving of the trust of our employees, customers and suppliers as reliable and long-term partners.

Rigour and professionalism

We work with exemplariness and vocation to serve our customers, developing the capabilities of our teams to search for efficient and innovative solutions.

Loyalty and commitment

We foster diversity, promote professional development and acknowledge merit and creativity as drivers for productivity and progress.

Results-driven

Our actions are aimed at improvement and the achievement of goals, with a view to making the FCC Group a benchmark in profitability and competitiveness.

Well-being and community development

We are aware of the value that our services bring to society and we are committed to the protection of the natural environment, development and the well-being of communities.

III. Priorities of sustainability

FCC's Sustainability Policy establishes the company's main strategic lines for sustainable development and for the response to the main challenges that the Group faces in relation to environmental, social and governance (ESG) matters.

This policy establishes the general principles and the framework for the company's ESG strategy, as well as for all other specific sustainability plans and policies of the FCC Group and its business areas.

According to structure and to the ESG model, FCC wants to provide a response to the sustainable requirements of its stakeholders, while contributing to the achievement of the 2030 Agenda's goals, helping achieve the Sustainable Development Goals (SDGs) and respecting the United Nations' Global Compact, maintaining and consolidating the sustainable development of the societies in which it operates.

Our commitment to sustainability as a Group will be based on three strategic ESG pillars:

1. Preservation and protection of the environment

With regards to its environmental actions, these must be particularly respectful, since we believe that the role of FCC, as a citizen services company, is to be part of the solution, in terms of mitigation and adaptation to global warming, water supply and sanitation, waste management and the preservation of biodiversity.

The following strategic lines have been defined to ensure the environmental sustainability of our activities:

- Drive FCC's leadership in the response to climate change, moving towards a competitive low-carbon economy and promoting energy efficiency and the responsible use of energy.
- Apply the principles of the circular economy to increase ensure resources are used more efficiently, assess the waste management processes and increase the service life of materials.
- Promote the responsible use and management of water resources, reducing the degree of water stress in the regions in which we are present.
- Help preserve our natural capital, promoting the preservation of biodiversity and helping restore and recover ecosystems.

2. Positive social impact and development

With a view to becoming a key player in sustainable progress, the FCC Group incorporates social action into its business strategy, contributing to social, cultural, economic and labour development and well-being, promoting the creation of jobs and improving the quality of life of the people and communities in which it operates.

The company is aware of its prominent role in fostering the transformation of cities into inclusive, distinctive and innovative environments, based on management practices that place people at the centre of its lines of action.

The framework for promoting the social sustainability of our activities integrates the following:

- Guarantee the protection of Human Rights internally and across the value chain
- Contribute to the development of the communities in which we are present, by means of promoting charity actions, education and social investment.
- Drive talent and empower human capital, creating opportunities for personal and professional growth.
- Ensure the safety, health and well-being of all people and work environments.
- Promote equal opportunities, diversity and inclusion, creating a culture of respect, tolerance and equity.

3. Good governance, exemplary performance:

In its commitment to Good Governance, the FCC Group aligns its guidelines with the main applicable recommendations and, particularly, those that include sustainability among the duties of the Board of Directors.

We work with our own standards of ethical behaviour, which are stricter than those in force in the jurisdictions in which we operate. This commitment is reinforced by our Code of Ethics and Conduct, which guides FCC's actions within a framework of integrity and business ethics, and which is strengthened with a control and supervision system to turn it into the benchmark for exemplary action.

We have set forth the following strategic lines to contribute to sustainability from FCC's corporate governance area:

- Maintain a robust model of compliance, ethics and integrity to guarantee responsible behaviour.
- Prevent and detect risks associated with non-compliance, paying special attention to illegal and illicit conduct.

- Adapt to the best good governance practices and recommendations, to the extent deemed appropriate to FCC's shareholding structure.

IV. Dialogue with stakeholders

Our activities must understand and connect with the real needs of citizens better, while driving changes that promote cleaner, smarter and more inclusive development. To do so, we maintain a constant dialogue that helps us understand the different expectations of all stakeholders.

The FCC Group has several channels to communicate with stakeholders and through which they can become an active part of the process, allowing them to interact in a transparent, honest, truthful and consistent manner, and as a means to learn and improve our business performance.

We build relationships based on trust, partnerships and alliances with our stakeholders to strengthen their involvement, which allow us to allocate and exchange knowledge and resources. This allows us to continue to make progress and join efforts in the common goal of sustainable development.

V. Policy governance

The FCC Group's sustainability actions are led by the Group's highest governing bodies, the Board of Directors, through the Audit and Control Committee, to which the Sustainability Committee reports, which is made up of different business areas and the Compliance and Sustainability Department.

Board of Directors and Audit and Control Committee

FCC's Board of Directors will supervise and ensure compliance with this policy through the Audit and Control Committee.

The Audit and Control Committee will approve, monitor and assess the Company's sustainability strategy and practices, which will be established in a master plan prepared and approved at regular intervals.

The progress will be reported by the Company once a year through its sustainability report, which will also be made available to shareholders at the General Shareholders' Meeting.

FCC Group's Sustainability Committee

The Sustainability Committee is the axis that connects the businesses and the corporation together in this area, proposing initiatives and reporting the results to the Board. It is made up

of the different business areas of the FCC Group and of the corporate units associated with sustainability, with representation at the highest hierarchical level.

This management body is responsible for implementing the Sustainability Policy approved by the Board of Directors through the regular master plan proposed by this committee, and which will be subject to the approval of the Audit and Control Committee.

The sustainability master plans will be designed to support the Company's strategic plans.

FCC's Compliance and Sustainability Department and the Sustainability Committee, as well as other different internal and external stakeholders, will participate in the master plan proposal to be submitted to the Audit and Control Committee for its approval.

Sustainability Committee of the business areas

These committees are responsible for developing, implementing and ensuring compliance with the Group's Sustainability Policy in each business unit, in addition to rolling out the corresponding master plan within their division.

Compliance and Sustainability Department.

The Compliance and Sustainability Department, which is part of the General Secretary's Office, shall develop the systems used to monitor the results associated with the Company's sustainability practices. In addition, it will identify the risks associated with sustainability and establish how they are managed, and will coordinate the FCC Sustainability Committee, as well as other duties assigned in the Company's internal regulations.

Review and updates

This policy may be reviewed and updated regularly, at the proposal of the Audit and Control Committee.

Madrid, 26 April 2022.