



Anti-corruption policy

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0. VERSIONS

Version	Date	Amendments
01	27 June 2018	Initial version. Approved by the Board of Directors
02	29 July 2024	New complete version.

1. OBJECTIVE AND SCOPE OF APPLICATION

The Board of Directors of **FOMENTO DE CONSTRUCCIONES Y CONTRATAS, S.A.** ("**FCC**" or the "**Company**") has the power to determine the general policies and strategies of both the Company and those companies that form part of the group whose controlling entity is, within the meaning established by law, the Company (hereinafter, the "**FCC Group**" or the "**Group**"), including this anti-corruption policy (hereinafter, the "**Policy**"). The purpose of this Policy is to reiterate the FCC Group's commitment to compliance with the rules and the development of ethical behavior in its business activities, in accordance with the principles set out herein.

This Policy supplements and develops the provisions of the Code of Ethics and Conduct and the Compliance Policy, and is based on FCC's commitment to the values and principles set out in said Code, through which they project to their employees, directors and officers and any other persons linked to any company of the FCC Group a firm message of rejection and "zero tolerance" of bribery and corruption practices and, in general, of any conduct that involves an illegal act or contravenes FCC's policies, rules, values and principles.

The Policy shall apply to FCC as well as to other companies that form part of the FCC Group in relation to which FCC exercises direct or indirect control over their management, where such companies do not have their own anti-corruption or equivalent policies which have been approved by their respective management bodies and which are in line with the basic principles established in this Policy and in FCC's Compliance Policy, notwithstanding any special features resulting from the applicable regulations in each case.

This Policy shall be mandatory for members of the Board of Directors, directors and all employees of FCC and the other companies that form part of the FCC group, regardless of their position, responsibility or geographical location.

In the companies in which FCC holds a stake and to which this Policy does not apply because they do not form part of the FCC Group, the Company or the corresponding Group company shall promote, through its representatives on the management bodies of such companies, the alignment of their approach with this Policy.

2. APPLICABLE PRINCIPLES

In order to prevent corruption, the FCC Group will carry out all its activities in accordance with current legislation governing all areas of activity and in all the countries in which it operates, and is committed to compliance with the following principles set out in the Code of Ethics and Conduct of the Group.

1. **Compliance with legislation and ethical values.** Comply with current legislation and internal regulations, acting in accordance with the values and the Code of Ethics and Conduct of the FCC Group.
2. **Zero tolerance to bribery and corruption.**
 - a. Zero tolerance: Promote a culture that is opposed to both bribery and corruption, where 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.

- b. Giving and receiving of gifts and invitations: Avoid the undue delivery and/or receipt, directly or indirectly, of commissions, payments or gifts that will benefit the operations of the Group.
- 3. **Prevention of money laundering and transparent communication.** Avoid payments and collections in cash, monitoring the origin and purpose of the funds in order to comply with regulations on money laundering and/or financing of terrorism.
- 4. **Transparent relationship with the community.** Avoid undue payments such as facilitation payments to public officials, undue payments under the guise of donations, or direct or indirect financing of political parties, representatives or candidates.
- 5. **Conflicts of interest.** Act with loyalty and defend the interests of the FCC Group, avoiding any situations that could give rise to a conflict between personal interests and those of the Group, whether through activities or operations outside the group or as a result of personal or economic interests associated with Group transactions. Any conflict of interest should be reported through the Channels set up for this purpose.
- 6. **Monitoring of the ownership and confidentiality of data.** Comply with all regulations regarding Information Security and Data Protection in force, following and respecting the Group's measures for preventing outside parties and employees from gaining unauthorized access to information and/or data.
- 7. **We are diligent in terms of control, reliability and transparency.** Reflect faithfully and adequately all actions, operations and transactions of the Company in its books and records, in accordance with the principle of control, reliability and transparency of the Group's information.
- 8. **Extension of our commitment to our business partners.** Guarantee that the FCC Group establishes commercial relationships with partners that demonstrate ethical behavior and a high level of commitment that guarantees stable commercial relationships, thus avoiding a lack of integrity of the persons or entities with which business is conducted.
- 9. **Promotion of continuous training on ethics and compliance** for all employees of the FCC Group, paying special attention to the fight against fraud and corruption, as well as providing the necessary human and material resources for this policy to be disseminated efficiently, as well as implementing measures for the prevention and detection of criminal activities.

In the event that any employee has knowledge or suspicions of any form of fraud or corruption, he or she must immediately inform the FCC Group via the Whistle-blowing Channel so that the procedure is carried out in accordance with the provisions of FCC's Internal Reporting System Policy and that System's Procedure.

The FCC Group will not tolerate any retaliation against anyone who, in good faith, communicates events that could constitute a breach of this policy or the Code of Ethics and Conduct. Employees who violate these provisions will be subject to the corresponding disciplinary measures, including termination of their contract, as well as other possible actions and/or legal penalties.

3. IMPLEMENTATION

The FCC Group has various mechanisms to ensure adequate implementation of the Anti-Corruption Policy, as well as to prevent, detect, investigate and penalize cases of fraud and corruption, including:

- **Compliance Committee**, which will ensure the proper functioning of the Compliance Model, monitoring the applicable regulations, the risks and the effectiveness of the controls, as well as fostering a compliance culture, in accordance with the provisions of FCC's Compliance Policy, its Compliance Committee Rules and the Crime Prevention Manual.
- **Code of Ethics and Conduct** made available to all Group employees, which includes the principles and rules of conduct applicable that are mandatory for all employees of the FCC Group.
- **Whistleblowing Channel**, which forms part of the Group's Internal Reporting System and is the preferred mechanism made available to all employees, managers and directors of FCC Group companies, as well as to third parties that have dealings with those companies and, in particular, to suppliers and contractors, shareholders, volunteers, interns and trainees to enable them to report any irregularities or acts that may be contrary to the provisions of the Code of Ethics and Conduct, the law or any internal regulations and, in particular, that may constitute serious or very serious criminal offences or administrative violations, or an infringement of European Union law, , if applicable, of which they are aware. FCC's Board of Directors designates the Compliance Committee as being responsible for the System, and it shall delegate the powers to manage the System and process investigation files to the Compliance Officer. The general principles governing the regulation of this reporting system are set out in FCC's Code of Ethics and Conduct, in FCC's Internal Reporting System Policy and in the Internal Reporting System Procedure.
- **Policies and procedures.** Identification of the risks and controls aimed at preventing criminal activity, which, if necessary, will enable the Group to free the legal entity from liability.
- **Manifestation of acceptance.** The Group will periodically require employees, as determined by the Compliance Committee, to formally state that they have knowledge of and comply with the principles established in the Code of Ethics and Conduct and will provide the necessary training for the policies to be understood and complied with.