Corporate Social Responsibility Policy

Approved by the FCC Board of Directors on 28 July 2016

This policy sets out the commitments of the companies in the FCC Group regarding the business ethics and integrity framework, respect for the environment and with regards to adding value to the society where the company operates.

Its framework for action governs the business activity carried out by the FCC Group in all markets where it operates.
I. Basis

FCC would like to be a citizen services company that is renowned for its commitment to developing the societies it serves and through the activities, goods or services it provides.

Its hundred-year-old corporate culture and solid values have enabled FCC businesses to develop on the basis of long-lasting, transparent and mutually-beneficial relationships with the stakeholders the Group interacts with.

II. FCC Group principles of responsible action

Quality and innovation

- We strive to identify, satisfy and even anticipate the needs of our clients (internal and external).

- We are always looking for new ways to improve and innovate, remaining open to new ideas that go beyond our comfort zone.

- We always take into consideration all consequences and implications of our actions and decisions.

Integrity in our actions

- We carry out our activity in accordance with the legislation in force in the different settings or countries where the company operates, respecting our code of ethics.

- We faithfully fulfil our commitments, respect the rights and dignity of people and do not tolerate discrimination due to ethnic origin, religion or gender.

- We aim to promote the professional and personal development of our employees.
• We do not tolerate unethical practices for either personal or company benefit.

• We are loyal to FCC as regards any personal interests; we maintain an attitude of political neutrality in our activities; we respect free competition and we manage our contractors and suppliers with impartiality and objectivity.

• We are committed to respect for the environment and carry out our activity under precautionary and efficiency principles regarding the use of natural resources and biodiversity.

• We maintain a service-oriented attitude and act responsibly in communities affected by our activities.

**Efficiency in management**

• We systematically seek austerity and simplicity in everything we do, providing the services that our clients really want and removing any aspects deemed to be superfluous.

• Our work is geared towards facilitating the attainment of business and Group objectives.

• We strive to obtain the best results through optimum use of resources and cash flow.

• We also protect and strive to make the best possible use of other less measurable resources such as the FCC structure and management systems, our knowledge and experience, our brand and the relationships that we maintain with external stakeholders (clients, suppliers, etc.)

**Proximity and commitment**

• We regard our social responsibility as a way of managing the company which seeks not only to create value for shareholders, but also to work alongside communities in which we carry out our activity in order to promote their well-being and development.

• We believe that the value of people and the human relationships they generate are an intrinsic part of the services we provide and the goods we produce.

• We prioritise the objective of achieving well-being in the workplace and the professional development of those who work for the Group.

• We understand that in order to be leaders, we have to provide solutions that can transform urban communities into more intelligent, inclusive and clean environments.
III. Priorities in corporate responsibility

We would like to form part of the solution to the challenge posed by the 2030 Agenda for Sustainable Development Goals (SDG), approved by the United Nations in 2015, and therefore make better use of the opportunities in our markets.

Consequently, our responsible commitment is based on three priorities:

1. Connection with citizens:
   
   Our activities must better understand and connect with the real needs of citizens, and drive changes that promote cleaner, more intelligent and inclusive development. In order to do so, we will remain in constant dialogue to help us understand the different expectations of all stakeholders at all times.

   We work to maximise the positive impact of FCC activities on communities, promoting actions among citizens that improve the development of cleaner cities, and in dialogue with the public authorities in order to understand and respond to the current and future needs of urban centres.

   We carry out our activity under the precautionary principle, previously establishing systems that enable us to assess and mitigate the impacts that our activities may have on people or the environment.

2. Smart Services:

   We work to create new capacities in the organisation that enable us to design better sustainable solutions.

   Therefore, we include innovative and quality initiatives that promote more sustainable environments in the design, implementation, operation and maintenance phases in construction projects and services, with the aim of amplifying the positive social impacts and those regarding contribution to local development.

   In the environmental field, any actions we carry out must be particularly respectful given that we believe the role of FCC, as a citizen services company, is to be part of the solution regarding global warming mitigation and adaptation, water supply and sanitation, waste management and biodiversity conservation.

3. Exemplary performance:

   We work with our own ethical behaviour standards which are more demanding than those enforced in the jurisdictions where we operate.
This commitment is reinforced by our code of ethics that guides FCC activity within a framework of business ethics and integrity.

We are constantly strengthening the control and supervision system of this exemplary framework of action within which we work, so that it is a reference point in terms of integrity and business ethics.

We protect our employees here at FCC. Their health and safety are a priority above anything else.

We include commitment requirements in our value chain, and especially in relationships with partners, suppliers and contractors, that are in line with ours regarding ethical, social and environmental matters.

IV. Dialogue with stakeholders

The FCC Group maintains different channels of communication, dialogue and participation with its stakeholders so as to engage with them in a transparent, honest, true and consistent manner, and as a means of learning and improving our business performance.

V. Governance of this policy

Board of Directors and Executive Committee

The FCC Board of Directors will oversee compliance of this policy through its Executive Committee.

The Executive Committee will approve, monitor and assess the corporate social responsibility strategy and practices in the Company, which shall be set out in a master plan that is periodically drawn up and approved.

Progress is to be reported by the Company in its annual social responsibility report, and made available to the General Shareholders Meeting.

FCC Group Corporate Social Responsibility Committee.

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1 In compliance with Article 529 ter of the Capital Companies Act currently in force, and following principles 23 and 24, recommendations 6, 52, 54 and 55 of the Good Governance Code of Listed Companies produced by the Spanish National Securities Market Commission (CNMV).
The Corporate Social Responsibility Committee is the meeting point between the businesses and the corporation in this field, proposing initiatives and reporting results to the Board. It is made up of the different business areas in the FCC Group and any corporate units linked to corporate responsibility, with representation at the highest level.

This management body is responsible for developing the Corporate Social Responsibility Policy, approved by the Board of Directors, by means of the periodic master plan proposed by this committee, and approved by the Executive Committee.

The corporate social responsibility master plans will be designed to support the Company’s strategic plans. FCC Corporate Responsibility Management, the Corporate Social Responsibility Committee and other internal and external stakeholders will all play a role in drawing up the master plan proposal to be submitted to the Executive Committee for approval.

**Corporate Responsibility Committee in the business areas**

These committees are responsible for developing, implementing and overseeing, in each business unit, compliance with the Group's Corporate Social Responsibility Policy, as well as rolling out the relevant master plan within their area.

**Corporate Responsibility Management.**

Corporate Responsibility Management, part of Corporate Communication Management, will develop results monitoring systems relating to Company social responsibility practices. Additionally, it will identify the risks associated with this area and how they are to be managed, and coordinate FCC's Corporate Social Responsibility Committee along with other functions assigned by the Company's internal regulations.

**Review and update**

This policy will be periodically reviewed and updated at the request of FCC’s Corporate Social Responsibility Committee or Executive Committee.