

# FCC Group Code of Tax Conduct

## Introduction

This Code of Tax Conduct is compulsory to any person engaged with any company of the FCC Group regardless the type of contractual relationship determining his/her labor relationship, his/her position or the geographical area where that person develops his/her work, and its objective is to determine the policies, principles and values which must guide the behavior with regard to tax matters within the FCC Group.

This Code of Tax Conduct is aligned with:

(i) The values set in our Code of Ethics and Conduct: orientation to results, honesty and respect, accuracy and professionalism, loyalty and commitment, wellness and development of communities.

(ii) The mission of our Group, consisting of the design, accomplishment and management of infrastructure services, aimed to satisfying the requirements and needs of our clients and contributing to the sustainable development of the communities where we settle in.

(iii) The vision of the FCC Group, which aims to become an international group of reference in the provision of citizen services contributing to the wellness and sustainable progress of the society.

(iv) The corporate social responsibility policy of the Group.

The FCC Group is aware that the taxes paid in each jurisdiction where it is present, contribute essentially to people's development and progress. Consequently, when defining its tax policy, the FCC Group will aspire to create value for its shareholders and for the rest of stakeholders in a sustainable way. To this aim, the envisaged transactions will be made for business reasons, according to the applicable law, and taking into account the potential impact of its tax decisions in the different communities where the services are rendered.

Finally, the FCC Group will behave in a transparent way in tax matters, so that the markets and people recognize its contribution to society.

Based on the above mentioned, the principles of conduct which must follow all the employees of the FCC Group regarding the tax practice are defined below.

## Obligations in tax matters

### 1. Obligations for all the employees

All the employees of the FCC Group must comply with, insomuch as, in this case, it is applicable according to their activity and assumed functions within the Group, the procedures relating to the management of the tax matters as defined in the “Tax Control Framework of the FCC Group”.

### 2. Obligations for the tax department employees

The employees responsible for the tax practice of the FCC Group must fulfill the following duties:

- a. To observe the tax law applicable in each jurisdiction, following reasoned and sufficiently reasonable interpretations, and based on sufficiently verified facts.
- b. To respect the “Tax Control Framework of the FCC Group”, as well as the specific procedures of communication, performance and review related to the tax practice.
- c. To ensure that the relevant decisions concerning tax matters are supervised by the high management of the Group and they are duly justified, following a global and integrating approach which considers both the different business drivers and the potential risks assumed.
- d. To develop and promote a transparent and mutual trust relationship with the tax authorities in each country.
- e. To actively participate in the tax forums of those business associations and international organizations of which the FCC Group is a member, aimed to proposing specific tax measures intended to gather a fairer and more harmonized tax system, both for the FCC Group’s interests and for the interests of the society as a whole.