
Code of Ethics and Conduct

Version Approved by the **Board of
Directors of the FCC Group** on July
29th, 2024



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 Citizen Services offering comprehensive and innovative solutions for efficiently managing resources and improving infrastructures while contributing to improve citizen quality of life and the sustainable progress of society.

Mission

Efficiently and sustainably design, implement and manage environmental services, end-to-end water management and major infrastructure construction works to improve the lives of citizens.

Values

Results-oriented approach

We pursue improvement and endeavour to achieve goals with a view to making the FCC Group a benchmark in 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 oriented 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 the driving force of productivity and progress.

Community well-being and development

We are aware of the value that our services bring to society and are committed to environmental protection and the development and well-being of the communities where we work.

Our Code of Ethics and Conduct provides practical insight into the values shared across the FCC Group for enabling a more robust culture of compliance and supporting the creation of long-term value for our project.

Adherence to the content of the Code may under no circumstances contravene applicable legislation, though should such a situation arise, the content of the Code would be adapted in line with the legal provisions.

The Code shall prevail over any conflicting local internal rules and codes of conduct, 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 Compliance 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 anyone related to any FCC Group company, regardless of the type of contract or agreement defining their labour relationship, job position or geographical location in which they carry out their work.

The conduct guidelines in the present Code of Ethics and Conduct also apply to all investees and entities in which the FCC Group exercises control over management. The FCC Group will also encourage its investees, even when not under the group's control, providers, contractors, collaborators and other partners to adopt principles and values similar to the ones set forth herein.

Ethics and compliance model

The FCC Group's ethics and compliance model was created to forestall and detect compliance-related risks, including risks related to criminal offences, and minimise the potential impact thereof. The present Code constitutes the highest level guideline of this model, implemented through policies, procedures and internal controls that are regularly reviewed and updated.

This model is adapted to the Group's activities by regularly analysing risks, defining responsibilities and expected conduct, and allocating resources to train employees. Processes are also in place to assess the organisation's level of compliance and ethical corporate culture, and to detect, report and address potential irregularities.

The Board of Directors is responsible for approving the Compliance Model and the Code of Ethics and Conduct, and, ultimately, for ensuring an ethical corporate culture with the assistance of the Audit and Control Committee. Overseeing compliance with this Code in particular 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 Compliance Committee and Internal Audit. All of the foregoing is without prejudice to the responsibilities corresponding to the management bodies of the other Group companies and to the bodies responsible for the compliance function in those companies, in accordance with the provisions of FCC's Compliance Policy.

Each of the head of business areas companies in charge of managing FCC's main businesses shall have a compliance committee with responsibility for that company's compliance function, supported by its own compliance officer.

The FCC Group applies the principle of due control to promote compliance with applicable internal and external regulations, and to prevent, detect and eradicate conduct that is irregular, inappropriate or contravening these regulations.





Ethics and compliance principles

- You must know and observe the pertinent legislation in force in your work.
- You must apply the Code's guidelines to your individual conduct, encourage application thereof throughout the organisation, contribute to generating a culture of compliance, and prevent and correct any conduct that contravenes the Code.
- You must inform the Whistleblowing Channel of any conduct that comes to your attention that you believe to be in violation of the Code.



Compliance principles

We observe 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 due control with a view to preventing, detecting and eradicating irregular conduct.

Throughout the FCC Group, we believe that applying the principle of due control in ethics and compliance includes assessing the ethics and compliance models of our related third parties.

We report irregularities

We bring any incidents or irregularities of which we are aware to the attention of the organisation through the channels in place to do so.

Honesty and Respect

1. We observe legislation and ethical values.
2. Zero tolerance for 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. Health and safety are paramount.
13. We promote diversity and fair treatment.
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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 pertinent legislation in force and the company's rules and procedures, wherever we operate, including regulations related to international sanctions or restrictive measures, export or import control and dual-use products, as well as the company's rules and procedures.

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 compliance with 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 part of the criteria used for recruiting and evaluating Group employees, and when necessary, applying disciplinary measures.

The FCC Group's policies are available [here](#)

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 FCC Group 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 and diligently for the purpose for which they were awarded.

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

You should specially consider

Sanctions and International Embargoes

In general, international sanctions and embargoes are coercive measures applied against States, non-state actors or individuals who pose a threat to international peace and security. The most frequent measures are prohibitions of conducting trade or financial activities and bans on visas or travel restrictions imposed by a multilateral agency or state.

The sanctioned countries can be consulted in the following information links:

<https://sanctionssearch.ofac.treas.gov/>

<https://www.sanctionsmap.eu/#/main>

Dual Use Products are defined as products, including software and technology, that can be used for both civil and military or nuclear purposes.

You should be particularly watchful and in any case follow the policies and procedures on due diligence in relations with third parties, including those concerning partners and agents. In the event of doubt, check with the Compliance Officer:

- Trade, financial, import and export operations with sanctioned countries, persons or entities.
- Any operations related to Dual Use Products.

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-oriented 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 payment or collection. Exceptions in this regard must be duly documented and authorised, be for a small amount, which must in any case be less than 1,000 euros for payments to third parties and observe the pertinent local legislation in force.

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

Pay particular attention to the following

- The effective identity of the third party with whom we will be working: client, partner, provider, NGO, 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 collections from bank accounts, persons or entities residing in tax havens.

We safeguard free competition and best market practices

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Our goal of becoming a benchmark in the market is a responsibility, not just an advantage

We abide by the rules and principles of free competition of all 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.

Avoid the following under all circumstances

- 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 with market impact entails restrictions and responsibilities that you must be aware of and observe

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

In this regard, insider information is construed as 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 Act, 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 make transactions with assets and securities on which you have insider 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. In the discharge of their duties, FCC employees may not act in the interests of personal benefit, either present or future, whether their own or that of related persons.

Board members and directors must also know and apply commercial legislation and 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-party transactions.

Consult the Whistleblowing Channel for the following cases, which could entail a conflict of interest

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

- In an audit or a review by a regulator or supervisor, the team leader or a team member is a related party.
- 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.

Related parties are

- The employee's spouse or domestic partner.
- The parents, children and siblings of the employee or spouse (or domestic partner) thereof.
- The spouses or domestic partner of the employee's parents, children and siblings.
- Friendly relationships that may affect professional objectivity and the duty to act in the best interest of the Group.



Diligence and Professionalism

7. We are diligent in terms of control, reliability and transparency
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We are diligent in terms of control, reliability and transparency

7

Information on the FCC Group must be drawn up with maximum reliability, complying with applicable legislation and company rules, and 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 our employees must 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, first notify the Communications, Corporate Marketing and Brands Department to 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 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 with 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 carry out their professional activities. 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 responsible for acting with due diligence. We cooperate with the administration and audit divisions 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 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

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Our clients are at the core of our activities. 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 performance evaluations.

- Direct or indirect discrimination regarding 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 bearing no objective relationship to working conditions, regardless of whether contemplated or not in the applicable legislation of 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 the 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 use of the facilities, equipment and work resources at your disposal, seeking to use them efficiently.

Help in promoting best practices in the companies with which we collaborate by 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 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.

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. Exceptionally, with the express authorization by the highest ranking executive or head of the business, and in accordance with the procedure provided by the Group, donations may be made to political parties in countries in which it is expressly regulated by the Law and in the terms established by the Law, without under any circumstances having to object to obtain an undue advantage in business.

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

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

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 the FCC Group model.

Our partners, collaborators and providers must

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 other ILO Conventions.

Display a high level of commitment insofar as 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 their activities not only by complying with legislation but also by undertaking their activities so as to minimise negative environmental impacts and engaging in sustainable environmental management. Specifically, when providers conduct their activities at FCC Group premises, they should ensure that 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, considering ethical aspects and the professional and financial suitability of the parties with whom we do business.



What we expect of everyone working at the FCC Group

Know, understand and apply the conduct guidelines laid down in this Code and its implementing and complementary policies and procedures

The FCC Group will not tolerate any manner of noncompliance with the Code of Ethics and Conduct. No employee, no matter what their category or position, is authorised to request that other employees 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 and applicable legal liabilities.

While this Code does not encompass all the situations that could arise, it nevertheless establishes 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 Compliance Committee and/or the Compliance function.

Consider the following before making any decisions:

Does it contravene 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 noncompliance with the ethical principles and rules of conduct contained in this Code.

Prevent undue conduct from occurring. If you observe or are made aware of inappropriate behaviour, it is your duty to report it immediately through the Whistleblowing Channel.

Whistleblowing Channel

The Whistleblowing 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, the Criminal Prevention Model and other breaches or violations of the rest of the FCC Group's internal regulations, in order to prevent potential weaknesses and to strengthen the FCC Group's culture of compliance. You can also make enquiries and suggestions to improve internal control.

The Whistleblowing Channel forms part of the Group's Internal Reporting System, which guarantees the effective treatment of all notifications received through it, with full respect for the rights of the whistleblower, as well as the rights to the presumption of innocence and defence, honour and privacy of the persons affected by such notifications. It is governed by the provisions of the Internal Reporting System Policy and Procedure established by the Board of Directors.

The Compliance Committee receives and processes communications to the Whistleblowing Channel, which guarantees their confidentiality. Communications may also be submitted anonymously.

The Compliance Committee comprises the corporate directors of Compliance, the Legal Department and the Human Resources.

Investigation

The Compliance Committee investigates all notifications 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.

Any potential infringement of the Code of Ethics and Conduct or the associated regulations can be reported using the following channels:

By post P.O. Box 19312, 28080 Madrid. Spain

Via the FCC website and, where appropriate, the websites of other Group companies.

Through the FCC Group intranet or the FCC360 app.

By e-mail, to the address canaletico@fcc.es

Additionally, verbally:

By telephone/voice messaging through the telephone number provided, where applicable, in each country.

By face-to-face meeting, within a maximum period of seven days from the informant's request.

Complaints can also be communicated through the different accesses to the Whistleblowing Channel set up in the different countries, where applicable.

Solemn declaration Informed and in agreement

All employees and people linked to any company within the FCC Group must know and comply with the Code of Ethics and Conduct and FCC must make it available to us and make it known.

The Compliance Committee will determine the scenarios and frequency in which employees of any company within the FCC Group must reaffirm their commitment to complying with this Code.



The Code of Ethics and Conduct is regularly updated to incorporate new regulatory requirements, improvements arising from compliance reviews and best practices. Visit the FCC Group's website (www.fcc.es) and Intranet to view the valid version.

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