

SUPPLIERS CODE OF ETHICS

ferrovial

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INTRODUCTION

Ferrovial's values, reflected in its Corporate Code of Ethics, reflects environmental, social and good governance commitments. In line with this, Ferrovial promotes responsible behavior in its supply chain, in accordance with the highest standards of ethics and integrity, respect for the Law, transparency, health and safety, environmental responsibility and respect for human rights. Ferrovial encourages its suppliers to carry out their activities responsibly while respecting all national and international laws that are applicable at any given time.

PURPOSE

The purpose of the Suppliers Code of Ethics is to establish the ethical principles that should govern the activity of Ferrovial's suppliers. The Suppliers Code of Ethics is therefore a basic element of the due diligence process designed to ensure the ethical integrity of Suppliers and for the prevention of unethical behaviour.

Ferrovial encourages and expects these principles to be shared by its suppliers, who should follow them and in turn to pass them onto their own Suppliers and subcontractors in their commercial relations with Ferrovial.

In line with these principles, Ferrovial requires its Suppliers to absolutely reject any act that could be considered corruption or bribery of any kind and requires strict compliance with the anti-corruption legislation applicable at any time in the countries in which Ferrovial operates.

The provisions of this Code of Ethics are without prejudice to the additional conditions and requirements that may be established in the relevant applicable legislation, the practices and rules of the country that apply in each case, and the different contracts entered into with each Supplier.

Ferrovial reserves the right to carry out checks on the integrity of its Suppliers, who must cooperate in the due diligence process. In addition, Ferrovial may terminate the contractual relationship with those suppliers who fail to comply with any of the principles established in this Supplier Code of Ethics.

Likewise, Ferrovial will control and monitor the performance of its suppliers, and may, when it deems necessary, carry out evaluations of compliance with the requirements established in the orders/contracts signed with them.

SCOPE OF APPLICATION

This Code of Ethics applies to all suppliers of Ferrovial SE and the companies that make up its Group, regardless of their business sector, geographical location or activity. For the purposes of this Code, Group is defined as the group of companies controlled, directly or indirectly, by Ferrovial SE (hereinafter, Ferrovial SE and its Group will be referred to as "Ferrovial").

"Supplier" is understood to be a natural or legal person, unrelated to Ferrovial, that supplies products and materials, or executes works or services (with its own or subcontracted staff) for Ferrovial.

ETHICAL PRINCIPLES OF CONDUCT

The business and professional behaviour of Ferrovial's Suppliers must comply with the following basic principles and the fulfilment of the following commitments:

1. RESPECT FOR LEGALITY

Compliance with applicable laws

The Supplier's activities must be carried out in compliance with the legislation that is applicable at all times in the countries in which Ferrovial operates. It must avoid any conduct that could damage Ferrovial's reputation.

Fair competition

The Supplier shall avoid any action that may involve an unfair competition practice, and assumes the commitment to ensure compliance with the applicable antitrust laws.

Anti-Corruption Laws

The Supplier expressly assumes compliance with applicable anti-corruption laws, in particular those prohibiting bribery, and especially bribery of officials, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act ("UKBA") or other equivalent applicable anti-corruption legislation that may apply.

Rejection of insider trading

In the event that the Supplier possesses non-public information which, if published, could have an appreciable influence on the price of the other issuer to which such inside information relates, it must strictly comply with the provisions of the applicable regulations.

Relationship with the Authorities

The Supplier will at all times maintain an attitude of collaboration and transparency with public authorities or supervisory bodies with regard to any requirement, inspection or supervision that they may conduct in relation to the supplies, works or services they provide to Ferrovial. In addition, any relationship that the Supplier maintains with a representative of a Public Administration in undertaking its activity for Ferrovial will be guided by institutional respect and transparency.

Anti-money laundering laws

The Supplier must comply with applicable anti-money laundering laws, conduct business only with ethically responsible partners and receive funds only from legitimate sources. The Supplier must take the necessary measures to detect and prevent illicit or suspicious forms of payment and inform and/or report through the established channels if it has any suspicion or concern in this regard.

Accuracy in books and records

The Supplier must have accounting practices in place that help ensure the accuracy of its books and records and compliance with applicable laws.

2. ETHICAL INTEGRITY

Integrity

The Supplier and its employees must undertake their activities and business relationships based on the values of integrity, transparency and avoidance of all forms of corruption.

Anti-Corruption Policy

The Supplier shall maintain a policy of "zero tolerance" of any practice that may be deemed to be corruption, either active or passive, in the relations between the Supplier and any person, and especially those held with public officials.

Unacceptable conduct includes, but is not limited to, non-compliance with anti-corruption laws and, in particular, directly or indirectly offering, promising, hiring or authorizing payments in cash or in kind to any Ferrovial employee, public official or any other person or entity, with the intention of illegally obtaining or maintaining business or other unjustified advantages or benefits based on the decisions of these employees, public officials or third parties in general.

Professionalism and transparency

Relations with Ferrovial and in general with third parties shall be based on principles of professionalism and transparency.

The commercial, financial and/or business information provided by the Supplier to Ferrovial's interlocutors shall be truthful, complete and without any intention of deception.

Conflicts of Interest

The Supplier must immediately inform Ferrovial of any situation of actual or potential conflict of interest, due to its personal or professional relationships with customers, suppliers, competitors or employees of Ferrovial, that may affect its professional objectivity in decisionmaking during any contracting process that it intends to carry out with Ferrovial.

3. COMMITMENTS TO THE COMMUNITY

The Supplier undertakes to act in a socially responsible manner, in compliance with the law of the countries in which it operates and, in particular, assumes responsibility for respecting the cultural diversity and customs in force among the people and communities affected by its activities.

4. COMMITMENTS ON HUMAN RIGHTS AND LABOR PRACTICES

Respect for human rights

The Supplier shall scrupulously respect the human rights and public freedoms included in the Universal Declaration of Human Rights, in any other applicable human rights legislation and in the resolutions of the International Labor Organization (ILO), in particular the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

Abolition of child labor

The Supplier shall not use child labor or incorporate into its business activity any product or service coming from child labor, and shall ensure compliance with the provisions of the International Labor Organization (ILO) in relation to child labor.

Health and safety at work

The Supplier must ensure the protection of its employees and provide them with a safe and stable environment, keep its occupational risk prevention measures updated and scrupulously respect the applicable regulations in this area wherever it carries out its business activities.

Likewise, the Supplier must provide its personnel with the necessary training, material and equipment to carry out their work as contracted and it will be liable for any damage or harm for which it is responsible by action or omission, especially as a result of not having adopted the appropriate health and safety measures.

Equal opportunities

All Supplier's employees shall enjoy equal opportunity for career development regardless of age, gender, disability, marital status, race, nationality and creed. The Supplier assumes responsibility for maintaining a work environment free from discrimination and harassing conduct.

Rejection of forced labor

The Supplier shall take the necessary measures within its organization to eliminate all forms of forced or compulsory labour, understood as any work or service required from a person under the threat of any negative consequence if it is not performed.

Respect for freedom of association and collective bargaining

The Supplier shall facilitate the exercise of the rights of association and collective bargaining as set forth in the ILO Declaration on Fundamental Principles and Rights at Work.

Working conditions

The Supplier shall guarantee its employees fair working conditions in accordance with applicable law.

5. COMMERCIAL AND MARKET COMMITMENTS

Quality

All products supplied and services rendered by the Supplier to Ferrovial shall comply with the quality and safety standards and parameters required both by applicable laws and by Ferrovial, and shall comply with the agreed conditions.

Confidentiality and respect for third parties' information and personal data

With regard to access and storage of information, the provisions of the legislation in force at any given time in the geographical area in which is being operated must be followed. The Supplier must respect principles of confidentiality and must not use or share the confidential information that it has received during its business relationship with Ferrovial, except if it is already public domain, when expressly authorized by the latter, or for reasons of legal obligation or compliance with judicial or administrative decisions. Likewise, it will respect the confidentiality and privacy of the personal data in its possession in accordance with the applicable legislation.

6. ENVIRONMENT

Environmental requirements

The Supplier undertakes to comply with applicable environmental legislation, as well as to comply with in force regulations regarding the sourcing of conflict materials (some minerals and tropical woods) and from risk areas. In the case of site subcontractors, it shall ensure compliance with the regulatory environmental permits prior to commencement of work.

Pollution and greenhouse gas emissions prevention

In the development of its production activities, the Supplier will ensure that it has the appropriate mechanisms in place to prevent incidents that could result in environmental pollution. Likewise, it shall consider energy consumption in the development of its activities with the aim of minimizing greenhouse gas emissions.

Efficient use of natural resources

The Supplier shall make reasonable and efficient use of the natural resources it employs. Thus, Ferrovial recommends that its suppliers have Quality and Environmental Policies that guarantee sustainable and respectful performance.

Waste management

The Supplier shall have the appropriate mechanisms in place to allow proper waste management to facilitate its correct treatment according to the applicable regulations.

Biodiversity

The Supplier shall respect the environment in which it carries out its activities and shall minimize any negative effects that these activities may have on biodiversity.

ETHICS LINE

The Supplier may report any irregular practice related to non-compliance or violation of the principles contained in this Code of Ethics through the Ethics Line available on the Ferrovial website <https://www.ferrovial.com>, as well as through the P.O. Box 2160 (28080 Madrid, (Spain) and the toll-free telephone numbers described in the "Telephone line" section of the digital channel.

Ferrovial ensures confidentiality of all communications and, if desired, anonymity of those who use the Ethics Line, and will not tolerate any form of retaliation against them.