DRAGADOS

-TAX STRATEGY-

Introduction

Dragados UK Limited is part of the Dragados Group—a worldwide group with unmatched experience in infrastructure, bridge, highway, tunnel, dam and marine projects —and a key construction arm of the world-leading ACS Group, which operates in 68 countries.

This UK tax strategy for Dragados UK Limited (the Company) is published in accordance with the requirements set out in Schedule 19 of Finance Act 2016. This tax strategy, which has been approved by the Board of Directors, is effective for the year ending 31 December 2024.

Managing tax risks

The Board of Directors, in accordance with the regulations governing its functioning and powers, is responsible for the Company's risk control and management policy and periodic monitoring of internal information and control systems.

Tax risk can arise due to the complexity of tax legislation, potential differences in interpretation, and in relation to our business operating model. In order to manage this, management-approved policies and processes have been established to ensure the integrity of our tax filings and other tax compliance obligations in the UK and worldwide, and our tax processes are subject to the same level of internal controls, review and external audit as the rest of the business.

The Board of Directors approved this document containing the tax policy/strategy for the Company following these principles:

1.- The tax policy of Dragados UK, and the ACS Group where it belongs, is based on due compliance by the Company with the applicable tax regulations and accordingly compliance by all persons involved not only in tax management but also execution of transactions with a tax impact. This constitutes an essential aspect of the principle of integrity contained in the ACS Group Company's Code of Conduct, according to which all employees and management staff must comply with the general regulations in force in countries where it carries out its activity and act ethically at all times.

2.- Dragados UK, and the ACS Group where it belongs, must ensure a cooperative relationship with tax authorities based on mutual confidence and transparency. Efforts must be made to reduce litigation deriving from different interpretations of the applicable regulations using the dispute resolution procedures established for this purpose by the law, without preventing the Company from bringing claims to defend its legitimate interests where this is not possible.

3. Any business decision that may have tax implications must be adopted with full knowledge of such implications. In particular, in the case of transactions that must be submitted for approval by the Board of Directors, the Board must be informed of the tax consequences of the transaction when this may constitute a relevant factor to make the decision. In any event, any transactions which due to their amount or special characteristics or due to the possibility of different interpretations of the applicable law may in due course give rise to a relevant tax dispute must be submitted for approval by the Board.

The Board of Directors delegate the day-to-day management of tax affairs to the Head of Finance in addition to its own Managing Director, who the Head of Finance ultimately reports to.

The Head of Finance is responsible for ensuring their company's tax submissions are prepared in accordance with company policies and tax legislation. To ensure the organisation is effective and responsive, Head of Finance and Managing Director are authorised and responsible for making decisions as each company strives to be fully compliant with UK tax legislation.

Tax Planning

In order to ensure the Company fully comply with new and existing tax legislation; the Company occasionally seeks external tax advice to help us correctly interpret new technical and complex laws as well as confirming we are complying with all relevant statutes.

The Company makes operating decisions purely on a commercial basis and only after this consider how these transactions can be implemented in a way which maximises shareholder value whilst adhering to the Group's overall low-risk tax policies.

The Company sometimes seeks external views, especially with complex transactions as to whether our interpretation of legislation is correct, or if there are other considerations which will help increase shareholder value whilst achieving our commercial aims in a low-risk manner.

Management practices

1.- The Company's tax management is based on a reasonable interpretation of the tax regulations, taking into account both their literal terms and their spirit and purpose.

2.- The relevant tax implications of any Company transaction must be notified to the management bodies or levels that must give their approval. In particular, no restructuring transaction will be performed with the sole purpose of achieving a tax advantage.

3.- The Company is committed to not acquiring any entities which have registered offices in territories which are considered to be tax havens, and nor will it enter into transactions (within the group) where the economic purpose could be deemed to be base erosion or artificial profit shifting to low or no-tax locations.

4.- The Company will also refrain from creating artificial company structures not related to the Company's business activity with the sole purpose of reducing its tax liability, nor will it enter into transactions between its subsidiaries without any economic purpose other than base erosion and artificial profit shifting to low or no-tax locations.

5.- The Company will not constitute company structures for the purpose of concealment or which may reduce the transparency of the Group where it belongs (ACS Group).

6.- The Company will not accept nor pay invoices that do not correspond to supply of actual goods or services necessary for its activity.