

DRAGADOS

Modern Slavery Act 2015 slavery and human trafficking statement

Dragados is a construction business involved in developments such as highways, railways, maritime and airport works. We operate in a number of countries, with our UK contracting entity being Dragados SA (UK Branch). These entities are part of Dragados SA, headquartered in Madrid, Spain. Dragados SA is a fully owned subsidiary of the ACS Group (ACS), also based in Madrid, Spain. Consequently, both Dragados' policies and those of ACS apply to Dragados (UK Branch). Further details about what we do can be found on our [corporate website](#).

Dragados has a varied and extensive supply chain, working with a range of entities, including large corporations, small and medium-sized enterprises, and consultancies, across multiple construction projects throughout the United Kingdom. Our primary area of potential risk lies within the tiered supply chain structure involved in the delivery of our construction projects.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Dragados and the other ACS companies are committed to acting ethically and with integrity in all our business relationships and we expect the same high standards from all of our contractors, suppliers and other business partners.

Our policies on modern slavery and human trafficking are as follows:

- ACS Code of Conduct
- DRAGADOS Code of Conduct
- ACS Code of Conduct for Business Partners
- DRAGADOS Code of Conduct for Business Partners
- ACS Human Rights Policy
- ACS Sustainability Policy
- ACS Corporate Sustainability Due Diligence Protocol
- ACS Sustainable Procurement Policy
- DRAGADOS Policy on the Operation of the Ethical Channel

These policies can be found in [ACS's](#) and [Dragados's](#) respective corporate websites

DUE DILIGENCE PROCESS

In line with ACS's Corporate Sustainability Due Diligence Protocol, we implement robust due diligence measures across our operations and supply chain to ensure respect for and protection of human rights and the environment. This includes incorporating contractual obligations to ensure our business partners comply with the requirements of the Modern Slavery Act 2015.

To identify and mitigate the risks of slavery and human trafficking in our operations, we make informed decisions when selecting business partners. During procurement activities, we use prequalification tools to assess suppliers and subcontractors against the Common Assessment Standard selection questionnaire. This questionnaire evaluates key areas such as business ethics, health and safety and includes exclusionary criteria specifically addressing modern slavery risks.

Additionally, as part of our due diligence process, we use Modern Slavery Questionnaires to ensure that any organisations engaged in the provision of workforce sourcing and recruitment services have robust controls and measures in place to prevent modern slavery within their supply chain.

DRAGADOS

RISK ASSESSMENT AND MANAGEMENT

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Protect whistle blowers

To encourage compliance with its Code of Conduct and other policies, Dragados maintains an Ethical Channel open to all staff, contractors, suppliers, business partners and other third parties where concerns can be raised anonymously.

ACS's Board of Directors, through its Audit Committee, is responsible for supervising compliance with all its policies and internal Codes of Conduct. This information is available on ACS's Annual Corporate Sustainability Report, available [here](#).

In addition, Dragados's Board of Directors, in conjunction with Dragados's Compliance Committee, ensures these policies and procedures are regularly reviewed to ensure its adequacy and compliance, avoiding, at all times, any situations that may affect the company's credit and reputation. This information is available on Dragados's Sustainability Report, available [here](#).

EFFECTIVENESS

As part of our ongoing commitment to complying with the Modern Slavery Act 2015, we will continue strengthening our systems to identify and mitigate the risks of slavery and human trafficking within our supply chain. We will ensure that agreements with our supply chain and business partners include clear compliance obligations outlining our expectations as set out in our policies. Furthermore, we will continue to promote internal awareness campaigns to reinforce relevant regulations and policies, while actively promoting the use of our Ethical Channel and whistleblowing procedures.

TRAINING

All new employees benefit from an extensive induction programme which includes thorough training and development across Dragados's ethics and compliance programme, including the content of the organisation's policies and emphasises the importance of our zero-tolerance attitude towards any conduct that acts contrary to the organisation's policies and values.

Throughout the course of employment, Dragados continues to further arrange a series of regular compulsory training modules, including mandatory training for all of its staff on ethical and compliance matters, along with more specialised training sessions on modern slavery and human trafficking aimed at promoting a high level of awareness of the risks of modern slavery and human trafficking in our supply chains and our business as well as ensuring thorough understanding of the applicable regulations. All employees must complete specialised, tailored training in Human Rights during their induction.

ABOUT THIS POLICY STATEMENT

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year 2024.



Steve Holmes, UK Managing Director

DRAGADOS S.A. UK BRANCH

Regina House, 2nd Floor, 1-5 Queen Street, London, EC4N 1SW Tel: +44 (0) 207 651 0900

VAT No.: GB 110.8593.31 Company Registration No. FC 030098