

DRAGADOS

Sustainability
Report

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1. DRAGADOS GROUP

1. DRAGADOS GROUP

Dragados is a leading construction company founded in the early 20th century, whose activity is oriented toward the development of Civil Works infrastructure (highways, railways, maritime, hydraulic, and airport works) and both residential and non-residential Building construction. Dragados is a global leader in the Construction sector, having participated in the creation of more than 7450 km of highways, 3642 km of roads, 1500 bridges, 1480 km of tunnels, 545 maritime works, 250 dams and hydroelectric plants, 1700 km of railways, rail transportation and numerous railway facilities, and 70 million sq. km of different buildings types, such as airports, hospitals, museums, high-rise buildings, and residential buildings.

DRAGADOS embodies a robust business vision, forged over more than 70 years of activity. During this time, thousands of individuals have contributed to making it one of the most prominent and forward-thinking companies in the construction sector, both in Europe and globally. It specialises in studying, designing and constructing any civil infrastructure and building, with special attention to those that are most unique due to their technical complexity, construction procedure or high degree of specialisation. The numerous milestones achieved over the years stand as a testament to the company's professional track record, with particularly notable accomplishments in transport infrastructure, hydraulic works, and underground projects within the civil engineering sector. In the building sector,

our specialisation is evident in the execution of large-scale non-residential construction projects.

DRAGADOS possesses the scale, financial capacity, and technological innovation required to manage infrastructure projects comprehensively, including conception, financing, design, construction, operation, and maintenance.

Dragados is the leading construction company in Spain, with a number of national subsidiaries specialising in different areas. Dragados is also a global leader in construction, in addition to being one of the world's largest contractors in public-private partnerships (PPP), having designed and built more than 100 concession projects worldwide. Dragados is developing major infrastructure projects in other European countries, such as the United Kingdom and Poland, where it is established through its subsidiary, Polaqua. Over the past few years, the United States and Canada have become the main business area of Dragados, thanks to the position and solid growth of its activity through its North American subsidiaries, Schiavone, Pulice, John P. Picone, Prince Contracting, and J.F.White Contracting, and its head companies on the North American continent, Dragados USA and Dragados Canada. Dragados also has extensive experience in the execution of projects in Latin America, with a presence spanning over thirty-five years, especially in Chile.

OUR COMPANIES



1. DRAGADOS GROUP

BOOSTING GLOBAL SUSTAINABILITY OF INFRASTRUCTURES

One of the cornerstones of the Dragados Group's corporate strategy is its commitment to carrying out its activity in a sustainable and responsible way, based on the ACS Group's Sustainability Policy.

This Sustainability Policy, which has been updated and approved by the Board of Directors, establishes the following actions to be taken by the ACS Group and its companies in the following areas, as well as in the Group's relationship with its surroundings:

- Respect of ethics, integrity and professionalism within the Group's relationship with its Stakeholders.
- Respect of the economic, social and environmental context.
- Promotion of research and innovation in the implementation of infrastructure development.
- Generating employment and welfare, as an economic motor for society.

- Developing an adequate and rigorous non-financial risks management, that may affect the Group, maximising the positive impacts and minimising the negative ones of its activities.

Therefore, in terms of Sustainability, the contributions of the Group's different companies converge to define their own action policies and manage their resources as efficiently as possible. This is always protected by the common principles defined in the ACS Group's Sustainability Policy, while pursuing the common objectives defined in the 2025 Director Plan for Sustainability approved by the Board of Directors on 16th of December 2021.

Based on this plan, the Dragados Group has established the 2025 Sustainability Plan.

This Plan sets out the Group's three strategic priorities and the twelve Sustainability commitments that the Dragados Group has set itself in order to continue promoting Sustainability regarding.

E SUSTAINABLE INFRASTRUCTURE

PROMOTING THE GLOBAL TRANSITION TO SUSTAINABLE INFRASTRUCTURE

- Climate Neutrality to 2045
- Circularity in our activities
- Lead infrastructures construction with sustainable certificates
- Protection of the environment

S TALENT AND DIVERSITY

INTEGRATING SPECIALIZED, DIVERSE AND COMMITTED TALENT

- Prioritize the occupational health and safety
- Development of specialized and diverse talent
- Economic and social development to support the local community

G COMMITTED GOVERNANCE

COMMITTED TO GOOD BUSINESS PRACTICES AND SUSTAINABLE GOVERNANCE

- Sustainability in the governance model
- Ethical and responsible culture
- Adapt the Group's financing to new sustainable financing models
- Responsible management of the supply chain
- Quality and reliability of sustainability information

SMP2025
Sustainability Master Plan
DRAGADOS

BUILDING A SUSTAINABLE FUTURE: Driving global sustainability in infrastructure

Within these 3 commitments, 33 objectives are defined for the year 2025 aiming to continue creating shared values and maintaining the Dragados Group's position as a global leader in the infrastructure sector.

Considering the requirements of stakeholders in terms of Sustainability and the identified construction material topics, the Dragados Group has established 16 of these objectives as priorities for 2025:

1. DRAGADOS GROUP



SMP2025
Sustainability Master Plan
DRAGADOS

SMP2025 With 16 priority objectives for 2025

The Dragados Group's Sustainability Plan is in line with:

- the goals and ACS Group corporate strategy,
- fighting against climate change,
- the wishes and requirements of stakeholders
- and the Sustainable Development Goals of the United Nations.

Thus, the new 2025 Sustainability Plan contributes substantially to the 6 priority Sustainable Development Goals.

The Plan will enable the Dragados Group to increase its contribution to the Sustainable Development Goals, generating a positive impact for society.

The new Sustainability Master Plan 2025 contributes substantially to the achievement of **6 Sustainable Development Goals** linked to the Group's activities.



1. DRAGADOS GROUP



RISKS

The Dragados Group carries out its activities in different countries and socio-economic and legal environments that entail exposure to different levels of risk inherent to the businesses in which it deals.

In this regard, the ACS Group has a General Risk Map that is updated periodically, and is a fundamental tool of its Integral Risks Control and Management System, the latest version of which was approved in December 2023. On the construction business side of things, this risk map is applicable to Dragados Group companies and is used to manage them, implementing the appropriate mitigation measures in each case.

In relation to non-financial risks, and in accordance with the ACS Group's general risk map, the main risks that have been detected in relation to the issues dealt with in this Sustainability Report that may have an impact on the development of the company's activity are as follows:

Natural disasters and pandemics: they refer to potential risks that could negatively impact the Group's strategic plan due to extraordinary natural phenomena or pandemics, beyond or in addition to short-term operational effects (such as COVID-19).

Health, safety, and occupational risk prevention: due to the activity of the Dragados Group, incidents or accidents affecting the health and safety of employees, whether in-house or sub-contracted, are a material aspect for the company as it works towards the goal of achieving "zero accidents".

Labour relations: inadequate management of key aspects of human resources, such as collective bargaining agreements, remuneration models, resource planning, absenteeism, training and labour disputes, which can have a negative impact on the achievement of business objectives.

Talent attraction and retention: lack of availability of skilled and trained human resources necessary for the performance of the Group's activities. This risk takes into account the entire recruitment process, i.e. training, career development, and satisfaction.

Ineffective internal communication: lack of communication between management and the teams, which may negatively affect human resources management and labour relations, and may pose a risk to the achievement of objectives, individual development, and the working environment.

1. DRAGADOS GROUP

Procurement and outsourcing processes: the contracting of external services has associated risks arising from the unavailability of suitable companies or professionals, inadequate selection or lack of capacity to meet the obligations undertaken, which may lead to delays, cost overruns, or quality failures.

Impact on the economic and social environment: the risk of generating a negative economic and social effect on local communities and responsible supply chain as a consequence of the Group's activity.

Customer relationship: inadequate customer relationship management can have a number of negative impacts on revenues as well as on the reputation of the business. In addition, there are risks associated with market conditions beyond the Dragados Group's control.

Infringement of human rights: the risk arising from non-compliance with the Dragados Group's corporate commitment to the United Nations Global Compact on human rights and labour, as well as the regulations in force in the countries in which the Group operates.

Management and Transparency in communicating relevant information to stakeholders (financial and non-financial): potential risks associated with the reliability and integrity of financial and non-financial information presented internally and externally, which is used in decision-making and subject to statutory or similar requirements. Inadequate communication of this information to the ACS Group's main stakeholders (such as investors, shareholders and proxy advisors).

Information security and cyber-attacks: cyber threats could lead to a loss of tenders, prolonged operation downtime, uncontrolled access, and information and data leaks.

Environment and circular economy: the inappropriate use, or lack of use of the natural resources necessary for the development of activities that do not contribute to a circular economy model can lead to their scarcity and depletion, as well as the generation of negative impacts in protected areas or areas of high ecological value, as well as the implementation of activities in already affected areas, which can lead to a limitation of resources and opposition from local communities.

Climate change and energy efficiency: the occurrence of natural disasters or other climate change events, as well as non-compliance with new environmental and energy efficiency rules and regulations may impact the Group's activities and the cost of these activities.

Loss of Market Competitiveness and Innovation Capacity: potential risks arising from difficulties in developing competitive offers with profitability appropriate to the activity's risk, due to market maturity, the entry of new competitors, or inadequate investment in R&D&I.

The description of the main non-financial risks, the detection, prevention, management, and mitigation measures, as well as the applicable management indicators and policies, are detailed in each of the relevant chapters of this report.



2. ENVIRONMENT

2. ENVIRONMENT

The Dragados Group combines efficient resource management and protection of the environment, operating under the principles of precaution and conservation of the natural environment in order to minimise the impact of its operations. Similarly, due to the climate emergency, the Dragados Group aims to contribute to the transition towards a low-carbon economy by improving process efficiency within its activities, resulting in products and services with a lower environmental impact.

As a result of these commitments, the Dragados Group has defined an environmental management framework defined by the ACS Group's Environmental Policy, approved by the Board of Directors on 14 November 2018, and updated on 28 July 2022, articulated through the different management systems implemented in the Group's companies.

For this reason, the main environmental measures implemented by the Dragados Group are in accordance with the basic operating principles outlined in said policy. These guidelines are flexible enough to accommodate the specific procedures and mechanisms of each of the Group's companies. In this sense, the commitments set out in the Dragados Environmental Policy are:

1. Compliance with applicable legislation and regulations, as well as with other commitments made voluntarily in each of the Offices, Branches, Projects, Construction Works and Services carried out by the Dragados Group.
2. Pollution prevention, based on the evaluation of the potential risks to the environment at each stage of the project, construction work or service, with the aim of designing processes to minimise the environmental impact as much as possible.

3. Continuous improvement of environmental performance management by setting and monitoring environmental objectives.
4. Transparency of external communications, through the regular publication of information on environmental performance to all stakeholders, meeting their requirements and expectations, whether due to regulatory compliance or on a voluntary basis.
5. Training and awareness-raising, through coaching and consciousness-raising activities for employees, suppliers, customers and other stakeholders.

Dragados' Environmental Policy is embodied in the companies of the Group through the Environmental Management Systems, which guarantees the correct management of environmental risks and opportunities, as well as the continuous improvement of their performances.

A total of 95.2% of the Group's operations are related to companies that have management systems certified under ISO 14001 standard or other similar certifications. Through these certifications, the Group implements the precautionary principle. In addition, environmental management systems are verified by an external third party and 474 environmental audits have been carried out during 2023.

Thanks to this environmental management and control framework, the Dragados Group identifies the main impacts on the environment. Therefore, due to the Group's activity, the consumption of natural resources, the emission of greenhouse gases, the production of waste and the possible impact on biodiversity are identified as key areas in the company's management.

Level of implementation of the environmental management systems in Dragados Group companies (expressed as % of turnover)	2019 (1)	2022 (1)	2023
Implementation of ISO 14001 certification	74.4%	83.8%	86.7%
Implementation of other environment certifications	13.0%	9.4%	8.5%

(1) Data recalculated retroactively to make them comparable with the methodology used in 2023. Data on assets from the Industrial Services sector have been included.

2. ENVIRONMENT



2.1. FIGHT AGAINST CLIMATE CHANGE

Concerns about the risks resulting from climate change require the involvement of governments and businesses to contribute to a less carbon-intensive production and consumption model.

The Dragados Group is aware of the important role it can play in the fight against climate change, as the construction sector is considered to be one of the most carbon-intensive sectors. Therefore, one of the general objectives of the Dragados Group is to promote energy efficiency and the reduction of emissions in the different areas of its business.

The basic principles governing the actions of the Dragados Group in this area are set out in the Environmental Policy of the ACS Group and are focused on:

- Considering and assessing the climate change impacts of its activities, products and services.
- Minimising energy consumption and the emission of greenhouse gases generated by its activities.
- Establishing greenhouse gas emission reduction targets aligned with the latest trends and standards.
- Establishing mechanisms to manage the use of Energy and emissions, to objectively measure performance and decision-making.
- Identifying opportunities to promote environmentally-friendly products and services, adapted to the potential impacts of climate change and that contribute to the transition to a low-carbon economy.

To face climate emergency challenges, the Dragados Group has prioritised these issues in the Group's governance and management model. In addition to the basic action principles set out in the aforementioned Environmental Policy, the ACS Group also has a Sustainability Policy that defines the fight against climate change as one of its main action priorities. The Dragados 2025 Sustainability Plan has been approved to structure the priorities, commitments, strategic lines, and objectives of all Dragados Group companies regarding climate change. The objective is to anticipate and manage the risks arising from climate change, as well as identifying new opportunities through the development of new sustainable and environmentally friendly solutions.

Consequently, in the 2025 Sustainability Plan as it relates to its commitment to "Anticipate climate neutrality by 2045", the Dragados Group has set three basic strategic lines for itself:

- Implement a climate strategy to anticipate climate neutrality by 2045.
- Progress in measuring the carbon footprint and reduce Scope 1 and 2 emissions by 2025.
- Strengthen climate change risk management through the implementation of international methodologies.

Each of the Dragados Group companies is working on different initiatives and measures to help the Group follow this strategy and achieve the global objectives set out in the 2025 Sustainability Plan and following the guidelines set out in the Environmental Policy of the ACS Group.

2. ENVIRONMENT



MANAGING CLIMATE CHANGE-RELATED RISKS AND OPPORTUNITIES

In order to respond to the need for global and homogeneous risk management, ACS Corporation has established a model that includes the identification, evaluation, classification, assessment, valuation, management, and monitoring of risks at the Group level and in the operating divisions, including Dragados Group companies. These identified risks are used to draw up a risk map, which is regularly updated according to the different variables that make up the map.

Below is a summary of the methodology, as well as the identification and assessment of the main risks and opportunities identified for the Dragados Group in relation to climate change. For the reporting of risks and opportunities related to climate change, the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) have been followed.

Definitions

Climate change risks can be classified into physical risks and transition:

- Physical risks emerge from the physical effects of climate change. They are considered acute if they arise from specific weather and climate events, and punctual or chronic if they arise from more progressive changes in weather patterns.
- Transition risks are the risks associated with adapting business models to a decarbonised economy. These risks are interconnected and their identification is important for stakeholders, as inaction on these risks can have operational and financial consequences. These risks include legal, technological, market, and reputational risks.

Climate opportunities arise from both the transition to a low-carbon economy and adaptation to physical risks. These opportunities can be classified into five categories: opportunities related to energy efficiency, adoption of low-carbon energy sources, new product development, access to new markets, and resilience through the supply chain.

2. ENVIRONMENT

Scenarios and time horizons

As indicated in the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), different climate scenarios and time horizons have been used to assess climate risks and opportunities.

For assessing physical risks, the SSP2-RCP4.5 and SSP5-RCP8.5 scenarios have been used as references, alongside high-resolution CORDEX data from AR5. This approach evaluates historical (1986-2015) and projected climate impact drivers over short-term (< 5 years), medium-term (2020-2049), and long-term (2036-2065) time horizons.

For assessing transition risks, the International Energy Agency's Declared Policy Scenarios and Net Zero Emissions by 2050 have been used as references, focusing on the time horizons 2022-2035 and 2035-2050.

Methodology

A risk analysis methodology has been developed, tailored to the potential significance of the risks and founded on a solid scientific and technical basis. This methodology thoroughly outlines its scope, time horizons, calculation methods, underlying assumptions, parameters, indicators, and potential limitations, as stipulated by EFRAG requirements. This positions the ACS Group, and consequently all its subsidiaries, as leaders in the sector. The methodology is built upon the general risk analysis framework of the Intergovernmental Panel on Climate Change (IPCC) and other international organisations. It is structured around the ISO 14090 and ISO 14091 standards and aligns with the latest recommendations from the European Commission, the European Financial Reporting Advisory Group (EFRAG), and the Task Force on Climate-related Financial Disclosures (TCFD). This framework enables the quantification of economic and financial impacts and facilitates the analysis of compliance with the substantial contribution criteria and the Do No Significant Harm (DNSH) principle for adaptation at the project level.

The methodology enables the analysis of risks and opportunities across any time horizon and emission scenario, drawing on the best available climate data.

Significant advancements compared to those used in 2022 include enhanced spatial granularity, enabling analysis at the asset or project level for any activity within the Group and across any geographic location. It is also applicable to the supply chain or markets. Risk and its consequences are quantified using indicators or KPIs that reflect economic and financial impacts, such as changes in CAPEX, OPEX, loss of income, and increases in insurance costs.

The methodology also supports the application of the DNSH criterion and helps identify and assess adaptation measures that reduce risk for the Group, enabling the

development and implementation of adaptation plans in line with Taxonomy specifications. On the other hand, it also allows the identification of climate-related risks for the client, which generates opportunities for the ACS Group right from the initial stages of the negotiation.

The identification and assessment of climate risks and opportunities was carried out on a global level for ACS's three main business divisions, including the Dragados Group.

The main risks faced by the Dragados Group are outlined below in two categories: physical risks and transition risks. An analysis of the opportunities available to the Group is also carried out.

Physical risks

During 2023, a quantitative physical risk analysis was carried out by type of asset or project and geolocated for the Group's areas of activity. This is a substantial improvement on the previous year's analysis.

With the new methodology, risk analysis can identify specific projects or taxonomic activities linked to a set of geolocated assets or operations, providing insights into expected changes across various scenarios and time horizons. This, combined with the sensitivity of individual assets to these changes, enables a comprehensive risk assessment. This increased granularity in the analysis significantly enhances the available risk information.

The physical risks are analysed based on the type and geolocation of projects within Dragados Group's areas of activity, leading to the following conclusions:

- One of the primary physical risks to be analysed is that associated with extreme weather events, which are closely tied to the Group's activities.
- Regarding the exploitation and extraction of natural resources, the Group has put measures in place to manage and mitigate the risks posed by flooding and storms. Therefore, this can be considered a low-level risk.
- Regarding the risk associated with the diversity of activities, projects, and geographical locations, it has been determined that the risk is categorised as absent due to factors that mitigate its impact. Among these factors are: a low relative exposure concentration compared to the number of projects executed, as they are spread across multiple geographic locations; the risk analysis for RCP4.5 and RCP8.5 scenarios indicates no significant changes in the near future; and the Group has measures in place to address climate risks, including incorporating these measures into project bids and budgets, thereby avoiding material impacts from climate.

2. ENVIRONMENT

- In terms of construction, the risk analysis has determined that:
 - Projects with a lifespan of 3 to 5 years are assessed to have low or minimal risk in the near future (5 to 15 years).
 - In the long term (2050), these projects are also expected to face a low level of risk.

Transition risks

Transition risks are analysed using the International Energy Agency's Declared Policy Scenarios and Net Zero Emissions for 2050, considering both short- and medium-term horizons (2022 to 2035) and long-term horizons (2035 to 2050).

It is concluded that the Group has adequate measures in place—such as decarbonisation plans, communication and awareness initiatives, and actions for swift adaptation to new regulations or market changes—to address potential transition risks in the analysed horizons and scenarios.



2. ENVIRONMENT

Assessment of the main transition risks		
Risks	Overview	Internal risk mitigation initiatives
Reputational damage from climate change (reputational)	The growing awareness and involvement in society towards climate change may lead to a bad public opinion of the company and the sector: - As decarbonisation proceeds, the focus of public opinion may shift towards the construction sector. - The building sector still has great potential to reduce its emissions. In particular buildings that play an important role in climate change mitigation. - The financial sector could penalise carbon-intensive sectors that do not show adequate ambition on climate change or do not meet their climate targets.	The Dragados Group has a decarbonisation plan that aims to reach net zero by 2045. Such a target is aligned with the objectives of the Paris Agreement and generates significant co-benefits. - The Group has, and is developing projects and strategies to achieve adaptation, as well as adapting and building new infrastructures with the appropriate characteristics to achieve the global objective of net zero. - Promote internal and external awareness. - Encouraging diversification, research and progressive substitution of raw materials by alternative materials with a lower impact.
Increase in the cost of financing (market)	The ecological transition can significantly influence the cost of financing: - Funders are under increasing regulatory and reputational pressure to decarbonise their investment portfolios, and are passing this pressure on to the companies in which they invest. - The EU Taxonomy framework can drive shifts in private investment portfolios towards activities that contribute substantially to environmental objectives. - Climate aspects have a major influence on redirecting investment flows or securing better credit conditions.	The decarbonisation plan will play a key role in ensuring that there is no pressure on investors. - Over the course of this year, the Group's eligible activities have been shown to meet the DNSH criteria for adaptation. In addition, some of them also contribute to meeting mitigation and adaptation objectives, which could involve public, private or green finance and increase the number of PPP projects.
Price increase or decrease in insurance coverage (market)	As extreme weather events increase in frequency, they are likely to have a greater impact on insurers: - There is a growing risk that insurance does not cover natural catastrophes and extreme weather events related to climate change. - Damage caused by weather events is an obstacle to the profitability of the policies offered.	The risk analysis capability allows for risk analysis per project and over the lifetime of the project, thus enabling anticipatory climate risk management.

2. ENVIRONMENT

Assessment of the main transition risks		
Risks	Overview	Internal risk mitigation initiatives
Increase in the price of greenhouse gas emissions (regulatory)	Emissions trading schemes or carbon taxes are tools increasingly used by regulators to decarbonise the economy: - Existing trading schemes could be extended to other sectors indirectly affecting the Group, as has been the case with the European trading scheme with fuel suppliers in the building and transport sectors. - Emissions trading schemes or carbon taxes could be applied in the construction sector that directly affect the Group's operations. - Emissions trading schemes lead to a progressive rise in the price of carbon. This rise is higher in a global decarbonisation scenario.	The decarbonisation plan is a key element in reducing and anticipating possible effects of the increase in the price of emissions.
Project and service specification regulations (regulatory)	The energy transition may involve changes in project specifications, derived directly from regulation or indirectly through the decarbonisation needs of end-customers: - Public procurement can integrate climate change criteria, such as emission reductions and carbon footprints, into its service portfolio. - The administration can require its contractors to publicly disclose climate-related information, such as their decarbonisation targets and climate risks.	Progress is being made in disseminating information related to climate and environmental impacts. Throughout 2023, EFRAG requirements have been applied and the methodologies and tools used by the Group have been standardised. - These actions make it easier and quicker to respond to possible changes in regulation/standards. Any regulation requiring greater climate resilience of newly built infrastructure is considered to be in the Group's interest because of its advantageous position in this area.
Increase in the cost of raw materials (market)	Effective climate change policies as well as investments in low-carbon technologies could lead to higher commodity prices: - In a global decarbonisation scenario there is an increased risk of higher fossil fuel prices. - Higher energy costs or increased efforts to decarbonise production processes could increase the prices of building materials such as cement and steel. - The introduction of low-carbon substitutes for building materials on the market could make them more expensive.	- The risk analysis capability allows for risk analysis per project and throughout its lifetime, thus facilitating anticipatory climate risk management, which facilitates the transfer of costs to the customer. - Due to its large size and geographical spread, it has an extensive supply chain, which is an advantage when it comes to having low-carbon raw materials and maintaining the profitability of its projects. - The portfolio of projects linked to climate resilience and the transition to net zero is expected to increase exponentially in the short and medium term, compensating for the possible exit of customers from the market.

2. ENVIRONMENT

Opportunities

Key emerging climate-related opportunities for reaching zero emission targets, advancing the energy transition, or adapting to climate change include:

- Projects related to energy transition,
- Renovating buildings to meet energy efficiency regulations.
- Sustainable mobility.
- Infrastructure to facilitate economic transition.
- Clean energy.
- Energy storage.
- Charging infrastructure.

Understanding these opportunities will give the Group a competitive edge in designing, building, retrofitting, and operating sustainable and climate-resilient infrastructure. This involves continuously utilising measures, technologies, and materials that support activity development

while applying environmental mitigation and adaptation strategies, ultimately enhancing the long-term climate resilience of the projects. The analysis of activity alignment with the EU Taxonomy reveals that the Group undertakes projects recognised by the European Commission as advancing the transition to a more sustainable economy and society.

The costs of implementing these measures must also be considered. Various studies estimate that climate adaptation of existing infrastructure could cost USD 56 billion annually until 2050 (World Bank) or USD 415 billion per year until 2030 according to the United Nations, with the majority of this expenditure directed towards infrastructure, river flood protection, and coastal defences. Additionally, adapting transport infrastructure alone is projected to cost over USD 2 trillion per year until 2040. Additionally, the development of Nationally Determined Contributions (NDCs) and National Adaptation Plans (NAPs).

On the other hand, it's crucial to consider the implications of achieving net-zero emissions targets, which also impact supply chains and suppliers, particularly concerning raw materials like metals and other resources. They are also integral to the transition toward a more sustainable model.



2. ENVIRONMENT

EXAMPLES OF CLIMATE CHANGE OPPORTUNITIES FOR THE DRAGADOS GROUP

CLIMATE RESILIENCE PROJECTS

BAY PARK CONVEYANCE

The Bay Park Conveyance Project in Nassau County, New York, aims to enhance water quality by reducing nitrogen loading by 90%, bolster storm resilience in Long Island's western bays, and support the ecological recovery of the bays and marshes through improvements to existing wastewater management infrastructure.

The actions include constructing a new pumping station, rehabilitating an aqueduct, installing rising mains between the treatment plants and the aqueduct, and building a connection to the receiving tank at the pumping station.

ENERGY TRANSITION PROJECTS

KINCARDINE OFFSHORE WIND FARM (SCOTLAND), OAXACA WIND ENERGY PROJECT (MEXICO), AND PROGRESO WIND FARMS (MEXICO)

The Kincardine Offshore Wind Farm is located 15 km off the coast of Aberdeen, Scotland. This pioneering project involves installing wind turbines on floating platforms—five units with five turbines of 9.5MW each and one turbine of 2MW. The generated power is estimated to supply green energy to approximately 55,000 homes, saving 94,000 tons of CO₂ per year.

"33 CE Oaxaca I" (Oaxaca) and "Progreso" (Yucatan) are two wind farms located in Mexico. Oaxaca has an installed capacity of 102 MW, comprising 51 wind turbines, each with an individual capacity of 2 MW. The electricity generated, estimated at 250 GWh per year, will be fed into Mexico's National Grid, supporting green energy production and reducing CO₂ emissions by 240,159 tons annually.

Progreso has a capacity of 90 MW, consisting of 36 wind turbines, each with an individual capacity of 2.5 MW. This project is estimated to generate a total of 290 GWh of green energy.

SUSTAINABLE CONSTRUCTION

Among the most relevant impacts during the life cycle of the projects is mainly the operation of buildings and the infrastructures delivered to our customers. That is why the Dragados Group has become a benchmark within the sector in the construction of these types of projects.

Since 2015, Dragados has aimed to obtain certification for different LEED and BREEAM certified building projects, and in recent years has continued to extend this objective to additional infrastructure projects.

In 2023, the percentage of projects with sustainable certification as a percentage of sales within the Dragados Group reached 19.2%

The construction of sustainable buildings classified as Green Buildings enables a reduction of emissions throughout their life cycle, both during the execution phase of the project (which is carried out using sustainable materials, work contracts at regional level, etc.) and during the use and maintenance of the buildings. According to a study carried out by the US Department of Energy, LEED-certified buildings consume 25% less energy and 11% less water than conventional buildings, while the Australian Green Building Council's study indicates that Green Star-certified buildings reduce greenhouse gas emissions by 62% and water consumption by 51%. Thus, greenhouse gas emissions avoided by our customers during the use of these constructions with sustainable certification in 2023 has been 89,645 tons of CO₂eq.

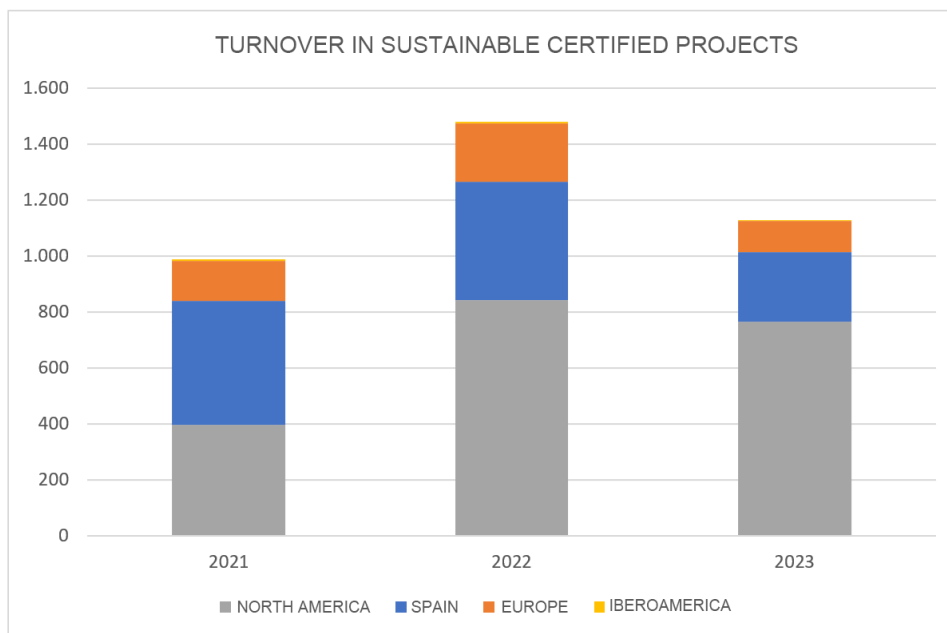


2. ENVIRONMENT

SUSTAINABLE CONSTRUCTION IN THE DRAGADOS GROUP

The number of projects, both building and civil works, with some type of sustainable certification continues to trend positively, with 2022 being an exceptionally strong year. In 2023, the Dragados Group had a total of 52 works in progress with LEED, BREEAM, WELL, ENVISION, BREEAM

INSTRASTRUCTURE or VERDE certification, the sales figure of which represented 20% of the Group's total sales. Furthermore, since 2017, Dragados Group companies have executed a total of 101 projects with sustainable certification.



In addition, one of the main elements of the R&D departments of Dragados Group construction companies, is the development of new projects for more efficient materials and construction use.



2. ENVIRONMENT

MONITORING INDICATORS AND TARGETS

To ensure compliance with the commitments established by the Dragados Group in relation to climate change, GHG emissions are monitored at all Group companies.

The methodology for calculating the carbon footprint is in the process of continuous improvement and the Dragados Group, adhering to its 2025 Sustainability Master Plan, is improving the scope and quality of the data reported, especially in emissions of scope 3. In 2023, there has been a notable improvement in this area, with emissions reported for the years 2019, 2022, and 2023 across all application categories defined by the Greenhouse Gas Protocol (GHG Protocol).

During 2023, despite the increase in the Dragados Group's activity, Scope 1 and 2 emissions have been reduced in absolute terms by 13.4%. In relative terms, comparing emissions to sales levels, the intensity of Scope 1 and 2 emissions is 20.0 tCO₂eq per million euros in 2023, down from 27.9 tCO₂eq per million euros in 2019. This represents a 28.2% reduction using a market-based approach for Scope 2 emissions (and a 25.9% reduction with a location-based approach).

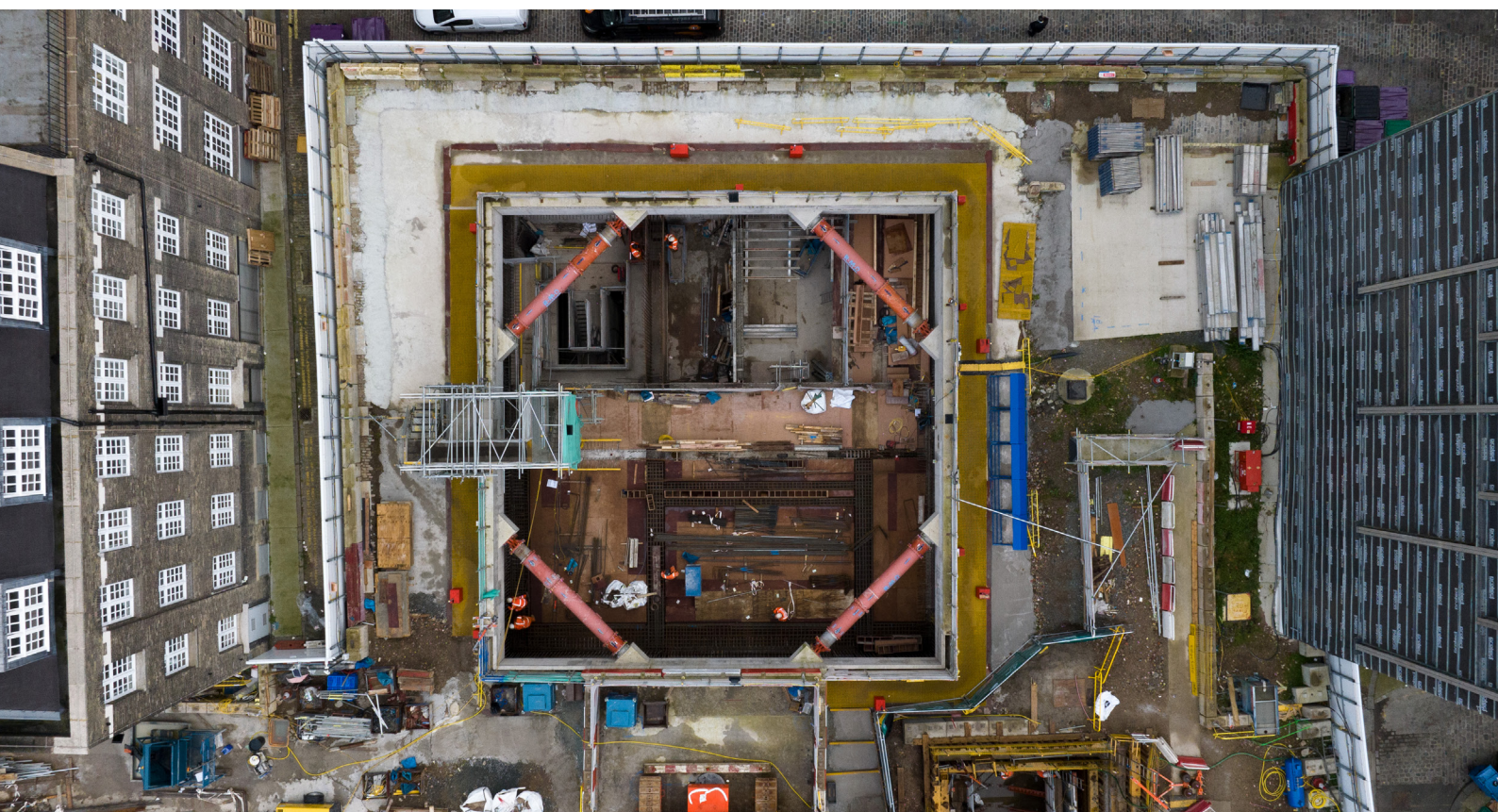
It is crucial to consider that, due to the size and diversification of the Dragados Group, the evolution of its activities, the types of projects undertaken throughout

the year, and the stages of major projects can significantly impact the year-on-year changes in emissions in absolute terms.

Nevertheless, all Dragados Group companies are actively working on initiatives to maintain the trend of reducing emissions across various activities. Despite the inherent variations in activity, they are striving to meet the objectives outlined in the Group's Sustainability Master Plan for the short, medium, and long term. This effort is evidenced by the 13% reduction in absolute Scope 1 and 2 emissions compared to 2019.

Regarding Scope 3, there is also a reduction in emissions in 2023 compared to 2022. This decrease is primarily due to lower material consumption, the adoption of best available techniques, and improvements in the calculation methodology, which enable more accurate analysis of data based on its origin, among other factors.

For comparison purposes, the data for years 2019 and 2022 have been presented once again using the same consolidation perimeter as in 2023. The data for 2022 has also been adjusted with information received after the publication of last year's report. Below is the evolution of the Dragados Group's emissions over the past two years, along with values for 2019 for comparison.



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CO ₂ EMISSIONS (t CO ₂ eq) (1)	2019 (2)	2022 (2)	2023
Scope 1: Direct emissions	94,486	91,874	90,129
Scope 2: Indirect emissions (3)			
Scope 2: Location based	41,683	29,900	31,638
Scope 2: Market based	41,141	26,313	27,285
Scope 3: Other indirect emissions (4)	3,464,229	2,362,970	2,223,721
3.1. Goods and services purchased (Materials)	2,905,380	1,457,569	1,377,572
3.2. Capital goods	33,376	27,802	54,814
3.3. Activities related to fuel and energy consumption.	22,836	26,714	24,888
3.4. Transport and distribution (upstream)	135,565	97,450	81,448
3.5. Waste generated during operations.	13,065	23,969	14,768
3.6. Business travel	11,120	6,810	7,759
3.7. Commuting to work	14,007	12,257	14,415
3.8. Leased assets (upstream)	10,129	360,402	343,367
3.11. Use of sold products	195,373	145,594	114,888
3.12. Final disposal of sold products	25,734	11,721	10,368
3.13. Leased assets (downstream)	5,730	5,772	5,943
3.15. Investments	91,915	186,908	173,491
TOTAL CO₂ EMISSIONS (SCOPE 2 MARKET BASED)	3,599,856	2,481,157	2,341,136
TOTAL CO₂ EMISSIONS (SCOPE 2 LOCATION BASED)	3,600,398	2,484,744	2,345,488
OFFSETTING CO ₂ EMISSIONS	0	-1,612	-2,469
NET CO₂ EMISSIONS (SCOPE 2 MARKET BASED)	3,599,856	2,479,545	2,338,667
NET CO₂ EMISSIONS (SCOPE 2 LOCATION BASED)	3,600,398	2,483,132	2,343,019

(1) For the calculation of Scope 1 emissions, the conversion factors provided by DEFRA (Department for Environment, Food, & Rural Affairs) for the different types of fuels reported in the report have been taken as a general reference. For the calculation of Scope 2 emissions, a market-based approach is utilised. In Spain, emission factors from the MITERD (Ministry for Ecological Transition and the Demographic Challenge) are used, including those from Guarantee of Origin (GoO) companies. For other regions, a location-based approach is applied, using emission factors reported by Carbon Footprint Ltd. Additionally, subsidiaries of Dragados in Canada, the USA, and North America use specific emission factors based on their respective provinces and states. 3.3., 3.4., 3.5., 3.6., 3.7. and 3.12. for the calculation of emissions in Scope 3, the emission factors given by DEFRA have been used. For category 3.1., specific emission factors related to the manufacturing processes of the construction materials acquired by Dragados have been used. However, for cement, the emission factor applied is the DAP CEM I SECTORIAL. For category 3.8., in addition to DEFRA emission factors, those reported by MITERD and IPPC have been considered, depending on the source of consumption. For category 3.11., the emissions have been calculated based on the square meters built, differentiated by construction type (residential and non-residential) and their energy consumption, assuming a useful life of 60 years to estimate the emissions associated with their activity. For the remaining categories, emission factors have been derived from various studies, reports, or data sources specific to each category.

When actual data for the last month of the year is not available, the figures from the previous year have been used as an estimate.

Scope 1 and 2 emissions are calculated as 100% of sales for the years 2019, 2022, and 2023, including emissions generated by Industrial Services assets.

(2) Emission data for Scope 1, 2, and 3 for the year 2022 has been updated with newly received information. Additionally, the emission values for 2019 and 2022 have been recalculated using the same methodology applied for the 2023 emissions, ensuring comparability.

(3) For the years 2019, 2022, and 2023, Scope 2 emissions have been categorized based on their approach, either market-based or location-based.

(4) For the calculation of Scope 3 emissions, the following categories have been considered: Purchased goods and services, Capital goods, Activities related to fuel and energy consumption, Transport and distribution (upstream), Waste generated in operations, Business travel, Travel to work, Leased assets (downstream), and Investments. The value has been recalculated for the years 2019 and 2022 using the same methodology as in 2023.

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CO2 EMISSIONS INTENSITY (t CO ₂ eq / million euros in sales) (1)	2019	2022 (2)	2023
Scope 1: Direct emissions	19.4	16.9	15.4
Scope 2: Indirect emissions (Market based)	8.5	4.8	4.7
Scope 2: Indirect emissions (Location based)	8.6	5.5	5.4
EMISSIONS INTENSITY SCOPE 1 + SCOPE 2 (MARKET BASED)	27.9	21.8	20.0
EMISSIONS INTENSITY SCOPE 1 + SCOPE 2 (LOCATION BASED)	28.0	22.4	20.8

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Emissions generated by industrial services assets are included.

(2) Scope 1 and 2 data for 2022 have been adjusted with new information received subsequently. Additionally, the emission values for 2019 and 2022 have been recalculated using the same methodology applied for the 2023 emissions, ensuring comparability.

EMISSIONS SCOPE 1 (tCO ₂ eq) (1)	2019 (2)	2022 (2)	2023
Fuel Consumption	94,486	91,874	90,129
North America	62,594	64,032	59,653
South America	2,931	3,384	2,102
Europe	28,962	24,042	27,362
Other	0	416	1,012
Scope 1 Emissions Intensity (t CO ₂ eq / m€ Sales)	19.4	16.9	15.4
Scope Data (% of Sales Level)	100	100	100

(1) For the calculation of Scope 1 emissions, the conversion factors provided by DEFRA (Department for Environment, Food & Rural Affairs) and MITERD (Ministry for Ecological Transition and the Demographic Challenge) have been used as a general reference. Emissions generated by industrial services assets are included.

(2) Data for 2022 have been adjusted with new information received subsequently. Additionally, the emission values for 2019 and 2022 have been recalculated using the same methodology applied for the 2023 emissions, ensuring comparability.

When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate..

SCOPE 2 EMISSIONS (tCO ₂ eq) (market-based) (1)	2019 (2)	2022 (2)	2023
Electricity consumption	41,141	26,313	27,285
North America	21,535	15,514	17,560
South America	8,526	4,194	3,958
Europe	11,080	6,605	5,767
Other	0	0	0
Scope 2 Emissions Intensity (t CO ₂ eq / mn € Sales)	8.5	4.8	4.7
Scope Data (% of Sales Level)	100	100	100

(1) For the calculation of Scope 2 emissions, a market-based approach is utilised. In Spain, emission factors from the MITERD (Ministry for Ecological Transition and the Demographic Challenge) are used, including those from Guarantee of Origin (GoO) companies. For other regions, a location-based approach is applied, using emission factors reported by Carbon Footprint Ltd. Additionally, subsidiaries of Dragados in Canada, the USA, and North America use specific emission factors based on their respective provinces and states. Emissions generated by industrial services assets are included.

When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate..

(2) Data for 2022 have been adjusted with new information received subsequently. Additionally, the emission values for 2019 and 2022 have been recalculated using the same methodology applied for the 2023 emissions, ensuring comparability.

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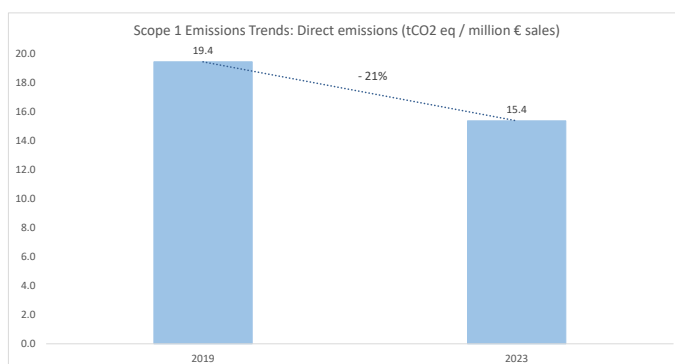
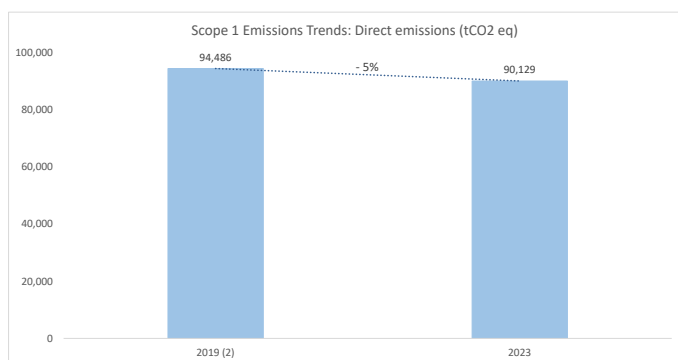
The Dragados Group will continue to work to improve the reporting of Scope 3 emissions, including improvements in measurement in order to be able to set quantitative reduction targets for 2030 as soon as possible.

During 2023, the different companies of the Dragados Group have worked on different initiatives adapted to their activity in order to achieve the rest of the objectives set by the Group in relation to climate change in the Sustainability Master Plan 2025 related to:

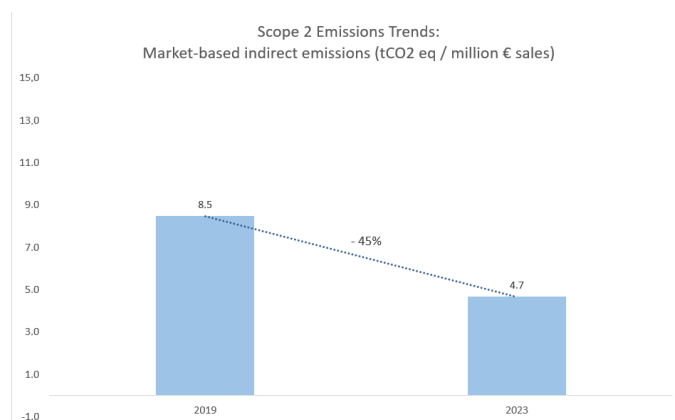
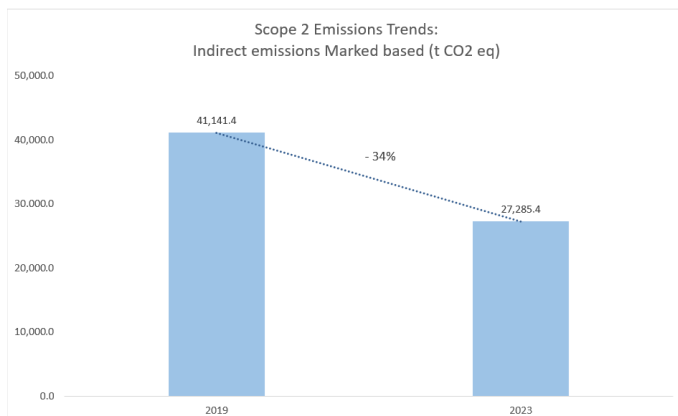
- Implementing a climate strategy to anticipate carbon neutrality by 2045.

- Reduction of Scope 1 emissions by 30% by 2030, with an intermediate reduction target of at least 8% by 2025.
- Reduction of Scope 2 emissions by 60% by 2030, with an intermediate reduction target of at least 25% by 2025.

The evolution of the emissions of Scopes 1, 2 and 3 compared to the 2019 baseline is shown below:

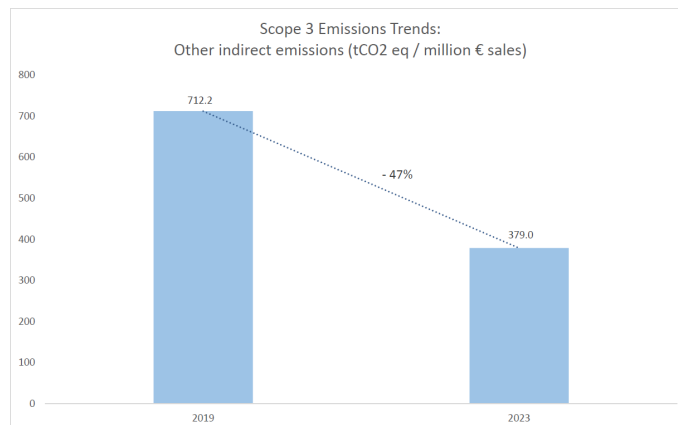
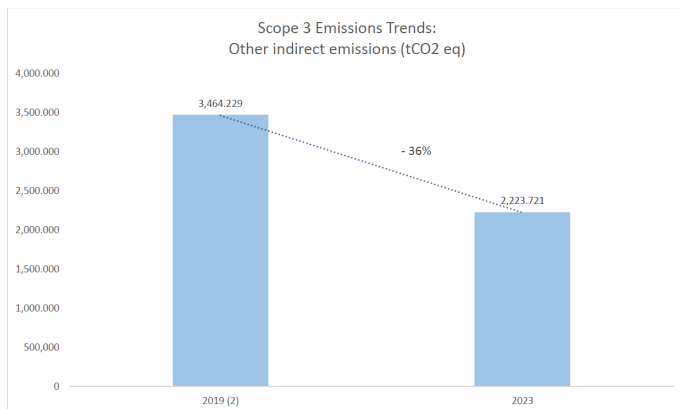


A 5% reduction in absolute Scope 1 emissions is seen from 2019 to 2023. However, the reduction in intensity is noticeably more significant. The primary measures implemented by the Dragados Group to reduce emissions from fuel use include improving energy efficiency and promoting the use of fuels and energy sources with lower environmental impact, among other initiatives.

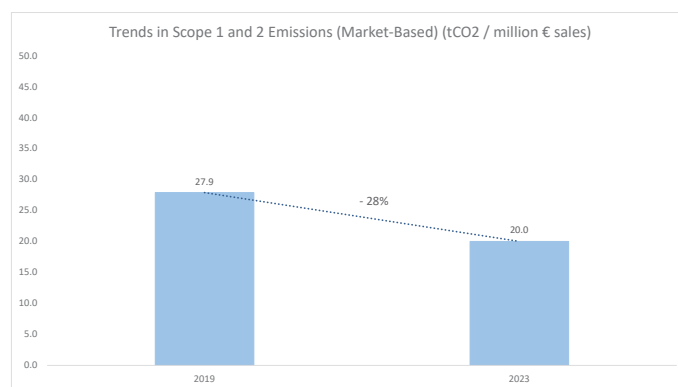
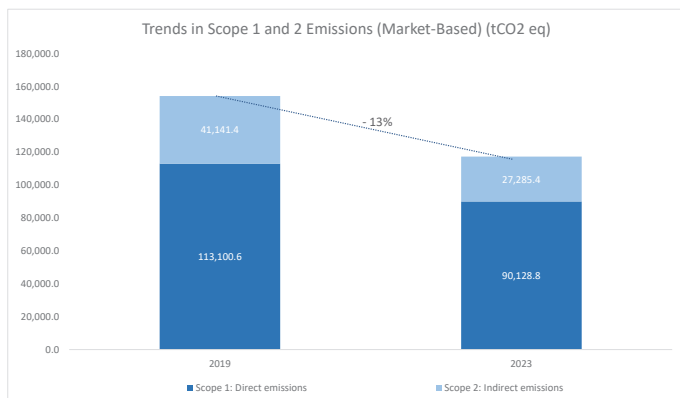


For Scope 2 emissions, a significant reduction is observed from 2019 to 2023. Additionally, the reduction in intensity is much more pronounced. Some of the measures implemented by the Dragados Group to reduce emissions associated with electricity consumption include promoting the use of electricity from guaranteed-origin sources and reducing energy demand through initiatives such as adopting LED technology.

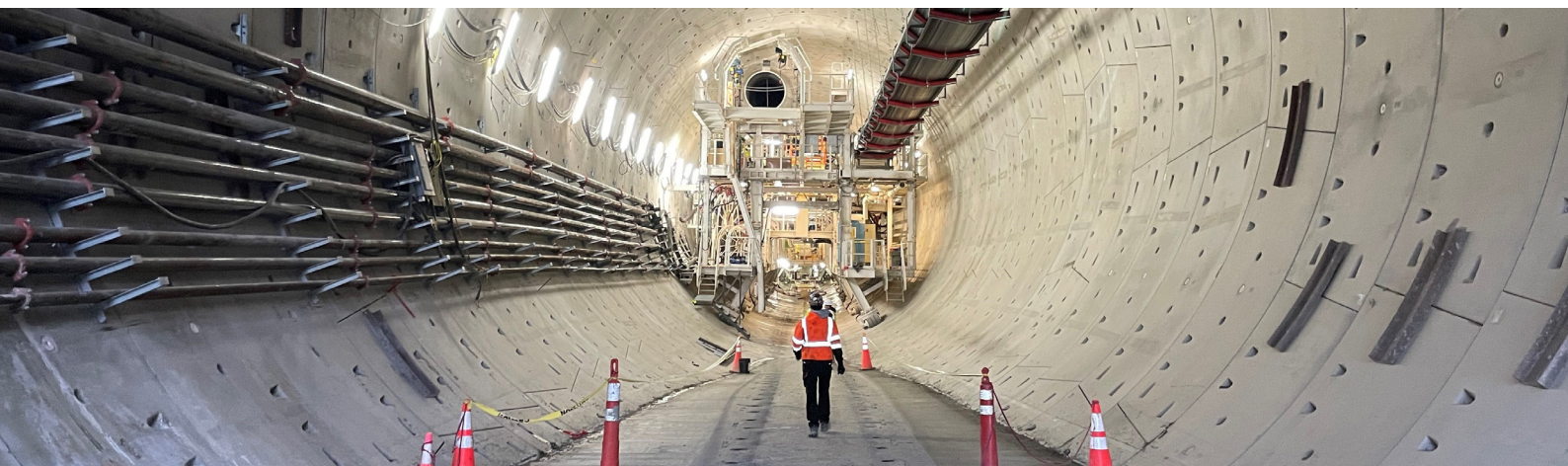
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For Scope 3 emissions, there has been a 36% reduction in absolute terms from 2019 to 2023. The primary measures implemented by the Dragados Group to reduce Scope 3 emissions focus on decreasing material consumption, which is crucial given its significance in category 3.1. Procurement of goods and services (the largest source of emissions in both years), implementation of best available techniques, and selection of local suppliers, among other measures.



Overall, there is a clear trend of emission reductions across all scopes, with a particularly notable decrease in Scope 3. The Dragados Group continues to implement measures in this ongoing effort to reduce emissions and achieve decarbonisation targets.



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In 2023, Dragados Group companies undertook actions to reduce GHG emissions, achieving an estimated reduction of 21,329 tonnes of CO₂. This was accomplished through initiatives such as sourcing guaranteed renewable electricity, reusing materials on site, and implementing other sustainability measures.

Furthermore, the Dragados Group is committed to minimising other emissions besides Greenhouse Gas (GHG), taking into account other polluting gases (NO_x, SO_x or Ozone-depleting substances), noise pollution and other possible nuisances deriving from the activity, such as light pollution.

OTHER AIR EMISSIONS (Kg) (1)	2019 (2)	2022 (2)	2023
NO _x	310,393	304,813	273,621
SO _x	384	235	77,025
VOC (without methane)	44,749	56,096	55,611

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Emissions generated by industrial services assets are included.

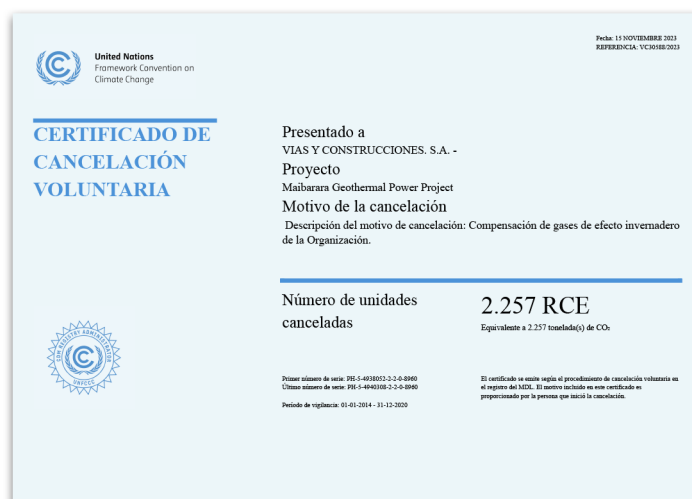
(2) Data for 2019 and 2022 have been updated with new information received later and recalculated using the methodology applied for the 2023 emissions calculation, ensuring comparability.

CALCULATING, REDUCING AND OFFSETTING THE CARBON FOOTPRINT OF VIAS

In 2023, VIAS calculated and verified its greenhouse gas (GHG) emissions for 2022, with verification conducted by an accredited external entity. These emissions were registered in the Ministry for Ecological Transition and the Demographic Challenge's Registry of Carbon Footprint, Compensation, and CO₂ Absorption Projects.

To help mitigate climate change, VIAS offset 100% of the carbon footprint from its own operations in scopes 1 and 2. This was achieved through 2.30% offsetting in a national reforestation project and 97.70% in an international hydropower project.

In this way, VIAS has achieved zero net emissions for its own operations, reaching carbon neutrality for both its direct and indirect GHG emissions from imported energy.



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ENERGY CONSUMPTION

Energy is one of the main resources used by the Dragados Group companies and, as part of the fight against climate change, the Group promotes energy efficiency and the use of renewable energy.

In this regard, 24.9% of the Group's sales have an energy management system according to the international standard ISO 50001 certified by an external entity. Likewise, 28.7% of the surface area of the buildings used by the companies of the Dragados Group are certified as energy efficient, either by ISO 50001 certification or by other sustainable building certifications (LEED, BREEAM, etc.).

Each year, the Group's energy consumption is determined predominantly by the amount of work carried out during the year with some activities being more energy-intensive, given the Group's high degree of diversity.

In this sense, energy consumption in 2023 has decreased by 12% compared to the previous year on comparable terms, essentially due to reduced fossil fuel consumption.

During 2023, Dragados Group companies have consumed 28,316 MWh of electricity from renewable energies sources, which represents 21.4% of the total electricity consumed.

Energy consumption (GJ) (1)	2022 (2)	2023
Fossil fuel consumption	1,371,700	1,354,111
Electricity consumption	427,965	476,501
TOTAL	1,799,665	1,830,612
ENERGY INTENSITY (GJ / million euro sales)	367.1	322.3

(1) For this calculation, the energy consumption by source reported in the table 'Energy Consumption by Source' is included and converted to GJ. Energy consumption from Industrial Services assets is included.

When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate..

(2) Data for 2022 have been adjusted with new information received subsequently.

The breakdown of energy consumption by source can be seen in the following table.

Energy consumption by source (1)	2022 (2)	2023
Petrol + Diesel (million litres)	34.91	34.64
Liquefied Petroleum Gas (million litres)	0.99	0.13
Natural Gas (kWh)	26,351,296	18,094,623
Biofuel (million litres)	0.01	0.99
Electricity (MWh)	118,880	132,363
Electricity from renewable sources (MWh)	29,764	28,316

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Energy consumption from Industrial Services assets is included.

(2) Data for 2022 have been adjusted with new information received subsequently.

The different companies that form the Dragados Group are implementing measures to reduce energy consumption by installing LED lighting on construction sites, implementing systems to control and optimise energy consumption, or replacing equipment with those that require less energy.

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USE OF RENEWABLE DIESEL FUEL IN THE USA IN THE CALIFORNIA HIGH SPEED RAIL AND THE LOS ANGELES OUTFALL PROJECT

As part of its efforts to meet the goals outlined in the 2025 Sustainability Plan, Dragados is exploring more efficient and less polluting alternatives for its projects, including the use of alternative fuels.

Among these alternatives, HVO (known as R99 in North America) is a renewable diesel made primarily from used cooking oil. This oil is catalysed with hydrogen to produce hydrocarbons. This type of fuel, being free of sulphur and oxygen, offers numerous benefits over traditional diesel.

It can reduce greenhouse gas emissions by up to 90% and significantly decrease particulate matter emissions.

Thus, in two projects located in California (USA), renewable diesel (R99) is being used for machinery and fleet operations. In 2023, a total of 983,506 litres of this biofuel were consumed across the two projects, preventing the emission of 2,436 tonnes of CO₂ equivalent into the atmosphere.

ENERGY EFFICIENCY IN GENERATOR SETS SALTO DE CHIRA HYDROELECTRIC POWER PLANT

For this project, where Dragados, S.A. holds a 45% stake, three electricity generation systems have been procured to supply power for tunnel construction.

These systems consist of three generator sets each, operating in tandem, with each unit having a capacity of approximately half of the maximum power demand. As a result, one system of 3 x 500 kVA and two systems of 3 x 400 kVA have been purchased. A SCADA control system will manage the operation by determining when to run a single unit or switch to two units based on increased demand. The third unit in each system remains on standby

as a backup for potential breakdowns and maintenance operations.

This cascade configuration, in contrast to the traditional single-generator setup designed to handle maximum electrical demand, is expected to save approximately 370,000 litres of fuel and reduce CO₂ emissions by more than 1,000 tonnes during the tunnel construction period. This translates to a reduction of approximately 56 tonnes of CO₂ per month.



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2.2. CIRCULAR ECONOMY: SUSTAINABLE USE OF RESOURCES AND WASTE MANAGEMENT

The promotion of a circular model that prioritises reducing and optimising the use of materials and efficient waste management is another one of the priority action areas of the Dragados Group. As such, in line with the ACS Group guidelines, the Dragados Group works to:

- Minimise the impact in regard to use of materials and waste management, taking into account the life cycle of projects
- Promote the use of environmentally responsible materials in accordance with the best practices outlined in the ACS Group's Building Materials Policy.
- Give priority procedures to reduce resource consumption and waste generation, in terms of both quantity and hazardousness. Contribute to extending the life cycle of resources, secondary products and waste through The reuse and recycling.
- Identify business opportunities that positively impact the circular economy through various activities, products, or services.

RECOVERY OF THE LAVA FLOW AT THE LA PALMA CONSTRUCTION SITE (DRAGADOS)

Following the volcanic eruption in 2021 on the island of La Palma, which disrupted mobility between various municipalities, the Ministry of Transport, Mobility and Urban Agenda (MITMA) responded with an emergency declaration. This led to the construction of a new 5.5 km road, LP-213, between Puerto Naos and Tazacorte, traversing the volcanic lava flows.

Due to the high temperatures of the lava flow over which the road was constructed, the new road was designed with a raised gradient to avoid the hottest areas. The excavated material from the site met 43% of the project's requirements, with no natural material excavated going to waste. This material, combined with reclaimed stone waste from nearby construction sites, was utilised to create levelled areas, gravel, asphalt mixtures, and concrete.

A total of approximately 306,940 m³ of stone material was used in the project, all of which was recovered. This contributed to a significant reduction in the project's carbon footprint for two main reasons:

- Production of materials on-site through the installation of aggregate and concrete plants, which eliminated the need for transporting raw materials and finished products.
- Eliminating the need to transport and treat waste at landfills.



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CONSUMPTION OF MATERIALS

The Dragados Group encourages the use of recycled and/or certified construction materials, offering the client these types of options at the time a decision is made as to the materials to be used, in accordance with the Construction Materials Policy of the ACS Group that stipulates the guidelines and good practices in this matter.

MATERIALS POLICY

The ACS Group seeks to implement the following best practices in the process of recommending construction materials to clients in tendering processes in which it is applicable:

1. Propose a traceability analysis of 100% of products used.
2. Keep a record of suppliers who offer recycled/certified products.
3. Stress the importance of aspects such as durability and maintenance when selecting construction materials.
4. Provide information about the characteristics of products which give off gases or contain harmful substances and also about the products' life cycles.
5. When making an offer or taking part in a bid to tender, always include the option of certified timber, and offer information on the environmental benefits of its use.
6. When making an offer or taking part in a bid to tender, always include the option of cement made from recycled aggregates, and offer information on the environmental benefits of its use.
7. Provide environmental details of the proposed construction materials, such as energy used by machinery during extraction or treatment, greenhouse gas emissions, etc.
8. Report on the corporate waste management policy.
9. Provide information on waste management plans in projects, including design phases.
10. Give information on specific targets to reduce, recycle and reuse waste.
11. Report on procedures in place for the recovery and recycling of construction materials by subcontractors.
12. Give details of staff and subcontractor training processes in waste management techniques.
13. Provide details of waste separation processes in project facilities and works.
14. Actively promote the purchase and sale of recycled by-products.

In recent years, the Dragados Group has made an effort to compile and report the consumption of the main materials used by its constituent companies.

Concrete, steel, wood and glass are the main materials used by the Dragados Group. Although the consumption of these materials largely depends on the level of activity, it is also influenced by the stage of the projects. However, the Group continues implementing measures to ensure efficient use of its activities as well as the development of R&D projects focused on this goal.

Similarly, one of the commitments defined in the Sustainability Plan is to promote the optimisation of resources by promoting the durability of construction materials. To this end, Dragados Group companies are advancing life cycle analysis for infrastructure and building projects by leveraging digitalisation and new technologies. This approach aims to enhance material efficiency and extend the useful life of their projects.

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Total materials used and percentage of materials recycled (1)	2022 (2)	2023
Total wood purchased (m ³)	13,772	22,369
Percentage of certified wood	4.2%	9.7%
Total steel purchased (t)	242,691	225,845
Percentage of recycled steel	46.2%	48.0%
Total concrete purchased (m ³)	2,119,931	1,767,353
Percentage of cement/concrete with recycled aggregate	3.9%	2.6%
Total glass purchased (m ²)	3,671	4,906
Percentage of recycled glass	0.8%	0.5%

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Includes data reported by Industrial Services assets relating to material consumption.

(2) Data for 2022 have been adjusted with new information received subsequently.

WASTE PREVENTION AND MANAGEMENT

Waste management in the Dragados Group promotes recycling, reuse, or other recovery processes rather than landfill use in order to minimise the waste generated during its operations as much as possible. In particular, the Group works to recover the waste generated during the production process so that it can be reused as raw materials, minimising the impact of the activity on the environment.

Waste is managed by each of the Group's companies in accordance with the regulations in force in each country. The facilities have the corresponding hazardous and non-hazardous waste production authorisations, which allow their registration, inventory, storage and appropriate management.

On the basis of the above waste management prioritisation, the waste is handed over to authorised waste processors.

As with energy consumption, the 2022 waste data has been recalculated to make it comparable to that of 2023 due to the increased scope of indicators.

As such, over the course of 2023, a total of 4,530,617 tonnes of hazardous and non-hazardous waste were generated, which represents a 8% decrease compared to the 2022 financial year.

Volume of waste (t) (1)	2022 (2)	2023
Hazardous waste	6,614	3,214
Non-hazardous waste	4,920,774	4,527,403
TOTAL WASTE	4,927,389	4,530,617

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Includes data reported by Industrial Services assets relating to waste generation.

(2) Data for 2022 have been adjusted with new information received subsequently.

It should be mentioned that the total volume of waste generated annually is directly related to the type of projects carried out. The large variations occurring happens despite waste minimisation measures promoted year on year by the Group.

The Dragados Group maintains a strong commitment to the circular economy, setting it out as a strategic line of the 2025 Sustainability Plan by prioritising recovery operations and minimising waste that is destined for landfills, with the goal of achieving 80% of waste being reused or

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recycled. During 2023, 88% of hazardous and non-hazardous waste are intended for recovery operations.

Finally, during 2023, an effort was made in the waste-related report information in accordance with the highest

international standards, presenting the data broken down by method of disposal, whether it is carried out in- side or outside of the facilities and presenting for the first time a breakdown of the main types of waste generated.

Breakdown of waste by operations (t) (1)	2022 (2)			2023		
	On the premises	Outside the premises	Total	On the premises	Outside the premises	Total
Hazardous waste (t)	26	6,588	6,614	38	3,176	3,214
Waste not destined for disposal by operation	25	463	488	33	1,150	1,183
Reuse	17	120	136	23	656	679
Recycling	7	58	65	9	131	140
Other recovery operations	1	285	286	1	363	364
Waste destined for disposal by operation	1	6,125	6,127	5	2,026	2,031
Incineration with energy recovery	0	0	0	5	22	27
Incineration without energy recovery	0	0	0	0	5	5
Landfill	0	4,809	4,809	0	545	545
Other disposal operations	1	1,316	1,318	0	1,454	1,454
Non-hazardous waste (t)	750,720	4,170,054	4,920,774	936,806	3,590,597	4,527,403
Waste not destined for disposal by operation	517,193	3,257,628	3,774,820	822,125	3,151,997	3,974,122
Reuse	159,803	2,070,445	2,230,248	51,752	986,673	1,038,425
Recycling	312,480	912,093	1,224,572	270,129	1,459,272	1,729,401
Other recovery operations	44,909	275,090	320,000	500,244	706,052	1,206,296
Waste destined for disposal by operation	233,528	912,426	1,145,954	114,681	438,600	553,281
Incineration with energy recovery	0	70	70	0	481	481
Incineration without energy recovery	0	0	0	0	0	0
Landfill	233,522	910,094	1,143,616	114,681	437,056	551,736
Other disposal operations	6	2,262	2,267	0	1,063	1,063

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Includes data reported by Industrial Services assets relating to waste generation and treatment.

(2) Data for 2022 have been adjusted with new information received subsequently.

2. ENVIRONMENT

In 2023, the Dragados Group is beginning to collect the information on waste by composition. Separate data is provided for Soil, Mineral Waste, Construction Waste, and other types of waste for the years 2022 and 2023.

Total waste breakdown by composition (t) (1)	2022 (2)			2023		
	Waste not destined for recovery	Waste for recovery	Waste generated	Waste not destined for recovery	Waste for recovery	Waste generated
TOTAL	1,145,954	3,774,829	4,920,783	553,281	3,974,122	4,527,403
Soil	822,277	3,284,873	4,107,150	284,750	2,552,843	2,837,593
Mineral waste	76,292	326,445	402,738	4,811	957,349	962,161
Construction waste	161,002	120,882	281,884	195,168	246,794	441,963
Other	86,383	42,628	129,011	68,552	217,135	285,687

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Includes data reported by Industrial Services assets relating to waste generation and composition.

(2) Data for 2022 have been adjusted with new information received subsequently.

EXAMPLES OF WASTE PREVENTION AND MANAGEMENT INITIATIVES BY DRAGADOS GROUP COMPANIES

RECOVERY OF ASPHALT MILLING WASTE IN THE AUTONOMOUS CITY OF CEUTA

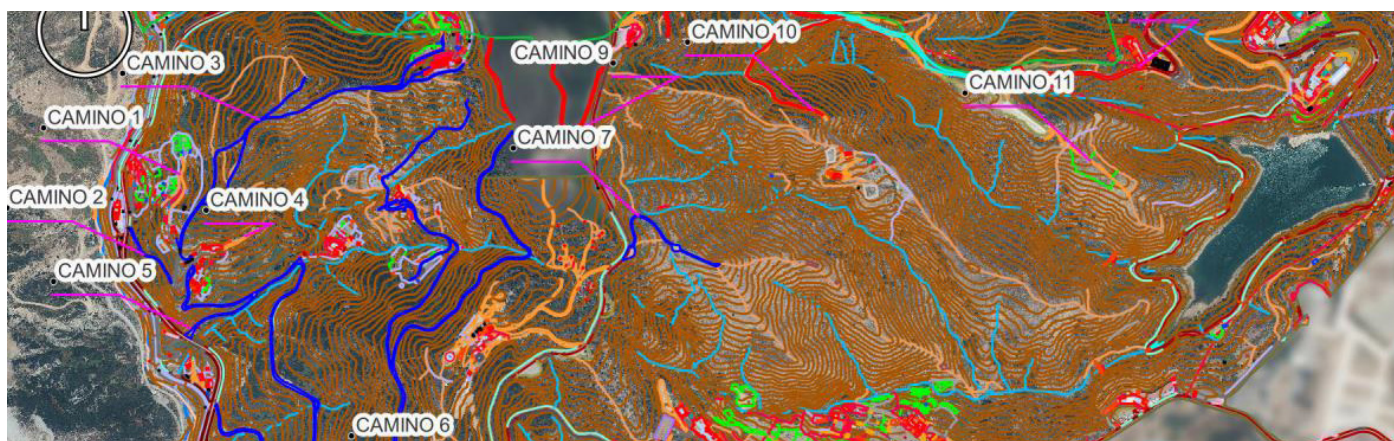
In the Dragados-Manuel Alba joint venture, which focuses on rehabilitating pavement and improving various roads in the autonomous city of Ceuta, challenges were identified in handling the waste generated from pavement milling.

- Initially, it was necessary to characterise the hazardous nature of the waste due to its origin from old pavements.

- Secondly, the challenge of managing milling waste was identified, as there are no hazardous waste handlers in Ceuta and a shortage of non-hazardous waste managers.

After characterising the milling WASTE AS NON-HAZARDOUS, discussions were held with the Autonomous City to explore potential uses for the material. It was agreed to utilise it for the periodic maintenance of forest roads and unpaved tracks, which are used by firefighting service vehicles, surveillance teams, and vehicles from nearby farms. For the on-site application, the materials were mixed in a 30/70 ratio, with 30% of the selected material sourced from stockpiles and 70% derived from milling waste.

Ultimately, all of the waste generated from the milling process—over 6,400 tonnes—was reused. This approach prevented the need for waste transportation to a waste manager, reduced landfill congestion, and minimised the use of natural materials for road restoration.



2. ENVIRONMENT

2.3. EFFICIENT AND RESPONSIBLE USE OF WATER RESOURCES

Aware of the significant role water plays in its activities, the Dragados Group promotes the rational use of water resources and develops desalination, drinking water treatment and purification infrastructures that contributes to guaranteeing access to drinking water and to improving the quality of water discharged.

The management and monitoring of key indicators—such as water abstraction, discharge, and consumption—enable the Group's companies to pinpoint projects or facilities with significant environmental impacts from water use. This approach underscores our commitment to conducting operations in a sustainable and environmentally responsible manner.

Additionally, the Dragados Group has broadened its data collection on water resources by gathering information

from our value chain regarding the water consumption involved in the production of two key construction materials: steel and concrete. In 2023, water consumption associated with the steel and concrete manufacturing process within the value chain is projected to total 1,174,511 m³.

The activities carried out by the Dragados Group are associated with significant water consumption, and in 2023, total water consumption reached 995.240 m³. The variations in water consumption experienced by the Dragados Group in recent years are attributed to the diversity of projects undertaken, making year-on-year comparisons in absolute terms challenging. This issue is also observed in other environmental indicators.

Water breakdown (abstraction/discharge) (1)	2022 (2)	2023
TOTAL WATER WITHDRAWN (m³)	6,749,942	5,540,205
Volume of water withdrawn from surface water (rivers, wetlands, lakes)	455,634	602,401
Volume of water withdrawn from groundwater	4,684,382	2,941,107
Volume of water withdrawn from third parties (municipal network, processing plant, or public or private service)	1,607,717	1,996,550
Volume of water withdrawn from marine waters	2,209	147
Total water withdrawn in water stress areas (m³)	2,087,432	2,228,454
Volume of water withdrawn from surface water (rivers, wetlands, lakes) in water stress areas	42,233	108,568
Volume of water withdrawn from groundwater in water stress areas	994,659	944,208
Volume of water withdrawn from third parties (municipal network, processing plant, etc.) in water stress areas	1,050,416	1,175,678
Volume of water withdrawn from marine waters in water stress areas	124	0
TOTAL WATER DISCHARGED (m³)	5,985,659	4,544,965
Volume of water discharged into surface water (rivers, wetlands, lakes)	4,785,750	2,496,156
Volume of water discharged into groundwater	363,056	12,006
Volume of water discharged into third-party waters (municipal network, processing plant, or public and private services)	737,556	1,925,883
Volume of water discharged into marine waters	99,297	110,920
Total water discharged in water stress areas (m³)	1,724,204	1,677,800
Consumption (m³)	764,283	995,240
Ratio: m ³ of water consumed/turnover (millions of euros)	140.8	169.6
Water withdrawal in water stress areas (m³)	363,228	550,654

(1) When actual data for the last month of the year is not available the figures from the previous year have been used as an estimate. Includes data reported by Industrial Services assets relating to water abstraction/discharge.

(2) Data for 2022 have been adjusted with new information received subsequently.

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In this sense, the Dragados Group companies have adequate measurement systems that provide detailed knowledge of the main sources of consumption. This information allows to develop the most appropriate efficiency measures in each case.

The Dragados Group recognises the need to optimise and reduce the consumption of this natural resource, especially in water-stressed areas. As a result, the Group began monitoring water consumption in these areas in 2019,

with total water consumption in these areas amounting to 550,654 m³ in 2023

It should also be noted that the Dragados Group carries out an exhaustive control of the quality of the water it discharges into the natural environment to ensure that the discharges do not produce significant effects on the environment, always complying with the provisions of local legislation as a minimum.

EXAMPLES OF INITIATIVES DREDGING GROUP COMPANIES CONSERVATION WATER RESOURCES: WASTE PREVENTION AND MANAGEMENT:

DRACE GEOCISA operates across a diverse range of areas, with significant variability among them. However, the majority of consumption needs are associated with operations and maintenance activities and specific fixed centres, such as factories. The primary sources of water consumption are industrial water used in various treatment processes, and water for irrigating green areas, roads, and facilities.

Considering these needs, the following groups of actions have been implemented:

- **Reclaimed Water:** Utilising untreated water entering the plants by installing or optimising existing systems to treat this wastewater, making it suitable for reuse.
 - as irrigation water and for cleaning installations through the required treatment processes.
 - in the preparation of polyelectrolyte, thereby eliminating the need for external supplies.

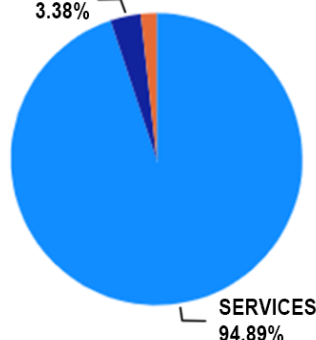
- **Reused Water:** At fixed centres, such as the Sagunto Factory, facilities have been upgraded to recover and treat process water, which is then used for cleaning and washing down roads and precast concrete storage areas.

The successful implementation of these measures has led to over 93% of the water "extracted" by the company coming from these sources, as illustrated in the following graph.

It is important to note that the uses described involve a high degree of water discharge in good condition to the environment (sometimes even better than at the point of collection). Consequently, the actual consumption (water withdrawn minus water discharged) is very low, especially when considering the water withdrawal and supply needs for the indicated activities.

WATER EXTRACTED

FIXED CENTRES
3.38%



WATER CONSUMPTION DATA 2023

Sources of supply

19,969,279.00

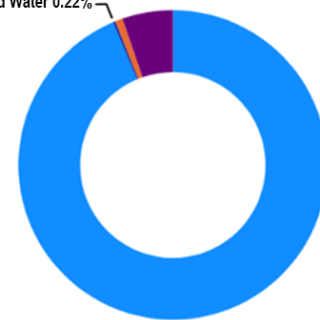
Total Drinking Water (I)

357,338,978.00

Total Non-Potable Water (II)

3,025,098.00	0.00
Surface Water...	Marine Water (I)
353,481,880...	832,000.00
Regenerated Water...	Reused Water (I)

Reused Water 0.22%



2. ENVIRONMENT

2.4. BIODIVERSITY PROTECTION

The Dragados Group's activities are likely to affect the natural environment as it operates in all types of locations and settings where a multitude of ecosystems may coexist. In this context, the company always tries to minimise the impact of its activities on biodiversity, paying special attention to protected natural areas and high environmental valued areas.

As a result of this commitment, the Group carries out its activity according to the following basic principles of action in the area of biodiversity:

- Apply the hierarchy of mitigation of impact on ecosystems by means of prevention, reduction, restoration and compensation actions, according to its clients.
- Implement management plans to preserve or restore biodiversity in activities or services that have a significant impact on ecosystems.

In this sense, during 2023, the Group carried out activities on 605 hectares of land considered to be of high biological value, activities that have specific plans and objectives to minimise their impact.

The Dragados Group has proven measures that ensure the conservation of plants and wildlife from the start of planning of the operations to the end.

These measures are based on:

- a. Physical protection, transplanting or transfer, and respect for the life cycles of the plant and animal species affected.
- b. Environmental impact studies, which identify the main effects on the natural environment of the projects and establish actions to minimise them. Public participation in procedures to approve these projects is guaranteed by the national and regional legislation in each of the countries where they are carried out.
- c. Supervision plans which guarantee compliance with the preventive measures and reduce the impact of projects and processes not subject to environmental impact assessments.
- d. Compensation, restoration, recovery and reforestation activities. During 2023, the Dragados Group carried out restoration work on 54.5 hectares.



2. ENVIRONMENT

2.5. RISK MANAGEMENT IN ENVIRONMENTAL ISSUES

Dragados supervises environmental performance and carries out appropriate action plans and improvement programmes, as well as the adoption of the necessary measures to reduce the environmental impacts related to the Group's activities, always following the principles established in the Dragados and ACS Group's Environmental Policy.

This takes into account the results of the risk map and the materiality analysis, which was reviewed in 2023, prioritising risks according to their relevance and the impact they may have on the company's business activity and applying the measures set out therein.

The environmental issues, their associated risks and opportunities, and the measures for their appropriate management are detailed below:

MATERIAL ISSUES	RISKS	DETECTION, PREVENTION, MANAGEMENT, AND MITIGATION MEASURES	MANAGEMENT INDICATORS
Climate change: transition to a low-carbon partner model	Businesses are faced with the need to devise appropriate strategies to tackle climate change. The ACS risk map identifies the specific risks related to climate change (physical and transition risks) according to the relevance they may have for the development of the company's activity. Risks: - Increased cost overruns - Reputational risk - Regulatory restrictions and sanctions	The Group's Environmental Policy and Sustainability Plan define commitments and targets for reducing emissions and resource use. In 2021, the ACS Group established targets linked to the variable remuneration of Executive Directors in relation to Climate Change performance. Each company is responsible for maintaining an Emission Inventory, identifying major sources and developing Emission Reduction Initiatives. The Group also offers its customers building products and services that contribute to the transition to a low-carbon economy.	Scope 1 + Scope 2 emissions reduction of 13% compared to the base year of the Sustainability Master Plan (2019) in absolute terms. Increased calculation and reporting of Scope 3 emissions, emissions related to consumption of building materials, waste, and travel. Renewable energy consumption: 21.4% of the total. Development of business opportunities as Green Building projects. During 2023, the Group continued to evolve its reporting model in order to be able to disclose information on climate change-related risks and opportunities in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), and to implement measures and initiatives to achieve the objectives set out in the 2025 Sustainability Master Plan in relation to climate change mitigation.
Environmental management	Companies have a dual relationship of dependence and impact on the natural environment. Therefore, the mitigation of impacts on biodiversity and natural resources is essential during the development of the Group's projects and operations, establishing a valuation of the ecosystem services that affect the company. The conservation and protection of biodiversity has become one of the main environmental challenges facing companies. The natural environment is one of the main allies in the fight against climate change, as well as being a mainstay of the economy, providing the natural resources on which the company's activity is based. Risks: - Loss of ecosystem services - Reduced economic growth - Regulatory non-compliance - Environmental litigation and penalties	Pursue continuous improvement in environmental matters, implementing an environmental management system that ensures compliance with policies and the setting and monitoring of objectives. - Evaluate the potential risks to the environment in each of the phases of the project, work or service, with the aim of designing processes to minimise the environmental impact as far as possible. - Promote the training and awareness of employees in environmental issues. - Promote actions aimed at raising awareness among clients, the value chain and society in general. - To carry out all Dragados Group activities in accordance with current environmental legislation. B3	By 2023, 86.7% of the Dragados Group's operations will be certified under the ISO 14001 standard. The environmental management systems are verified by an external third party and 474 environmental audits have been carried out during 2023. - During the year 2023 no significant infringements of environmental legislation and regulations have been recorded, understanding as such the non-compliances that entail a fine of more than 10,000 euros. - The Dragados Group manages environmental risk coverage through different systems depending on its activity and geographical area and in accordance with its own environmental management systems.

2. ENVIRONMENT

MATERIAL ISSUES	RISKS	DETECTION, PREVENTION, MANAGEMENT, AND MITIGATION MEASURES	MANAGEMENT INDICATORS
Circularity in the sourcing of construction materials in waste management	The incorporation of the concepts of circularity in the production model makes it possible to reduce the intensive use of natural resources and the high pressure on the environment. In addition, the optimisation of resources increases operational and financial efficiency, as well as reducing the waste generated. Risks: - Non-compliance with Dragados' environmental policy. - Reputational risk. - Regulatory non-compliance. - Efficient use of raw materials or conflict minerals. - Increased production costs	The Group's Environmental Policy and Sustainability Plan define commitments to promote the use of recycled building materials, the durability of these materials and the efficient management of waste. Among the objectives established in the Sustainability Plan, it has been set to promote life cycle analysis in infrastructure and building projects. It has also been established to maintain a recycling rate of more than 80%	The Dragados Group companies participate in various R&D projects related to durability and efficiency in the use of resources and construction materials. Rate of waste (hazardous + non-hazardous) destined for recovery in 2022: 88 %
Sustainable and resilient infrastructure	The risks arising from climate change, the scarcity of natural resources and the state and social context of the territory increase the demand for sustainable infrastructures. Because a significant percentage of GHG emissions come from buildings, developing more energy-efficient infrastructures contributes to climate change mitigation. The design and implementation of resilient infrastructure, in addition to providing recognition and leadership, enables the provision of safer services that better withstand extreme weather events and cushion the effects of natural hazards on society and its economy. Risks: - Loss of competitiveness - Physical risks due to climate change - Loss of reputation - Loss of profitability	- The Dragados Group, through its various activities, provides services that contribute to creating more efficient and sustainable infrastructures and cities - sustainable building, construction of public transport systems, etc. - The Dragados Group offers clients the use of recycled and/or certified construction materials. The executed projects comply with different sustainable building certifications, as well as CEEQUAL and ENVISION among others in terms of efficient infrastructures. - In Dragados Group companies, one of the fundamental pillars of its Construction company R&D departments is the development of new projects with materials that increase infrastructure resilience and help face the increase in extreme weather changes derived from climate change, as well as reducing the use of these construction materials and their reuse and exploitation. - Developing biodiversity policies and environmental studies to minimise impacts in the areas of activity.	- Development of Green Building projects: 52 under implementation in 2023 - Sales of projects with sustainability certification in 2023: 1.129mn



3. PEOPLE IN DRAGADOS GROUP

3 PEOPLE IN THE DRAGADOS GROUP

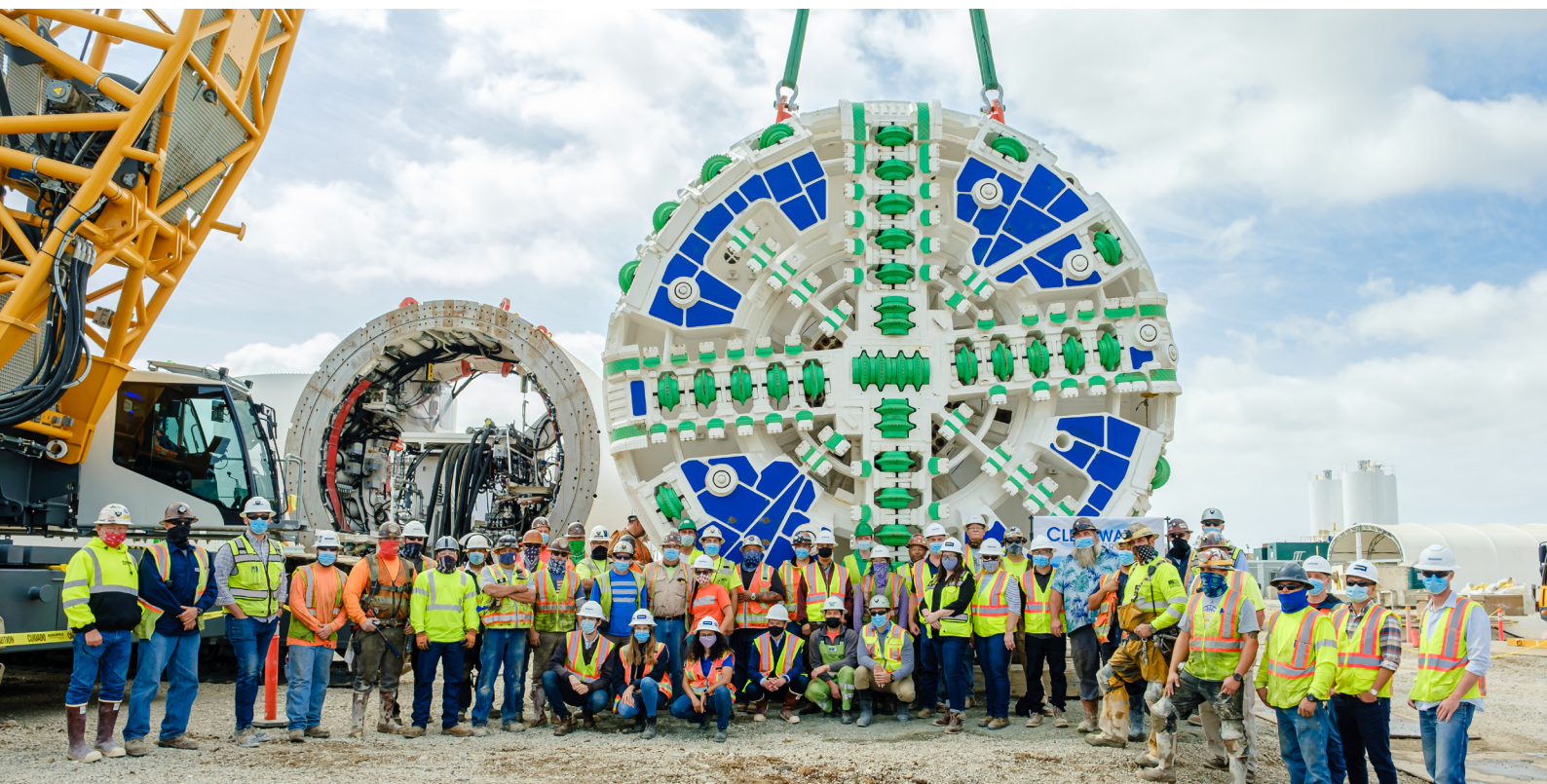
Dragados is one of the world's largest and most promising groups in the construction sector. It specialises in studying, designing, and constructing civil infrastructure and buildings, with special attention to infrastructure that is more unique due to its technical complexity, construction procedure, or high degree of specialisation.

In the Dragados Group, we firmly believe that the distinctive value of our Company is based on the quality of its team. The professional and personal diversity of our employees provides a better response to the growing demands of the market, through dynamic and enterprising management.

Dragados Group applies HR management techniques to retain the very best professionals. Each company in the Group implements its own HR policies in line with its activity and specific needs; all of these policies are complementary and follow common guidelines:

- Attracting, retaining, and motivating talented people, focusing on improving their level of responsibility.
- Promoting a corporate culture and values with which our employees can identify.
- Encouraging teamwork and quality control as tools to drive excellence in the quality of work done well.
- Guaranteeing equal opportunities, diversity, and inclusion.
- Supporting and expanding training and apprenticeships.
- Promoting R&D activities to improve processes, products, and services.

At year-end 2023, Dragados Group had **8934 employees** around the globe, of which women accounted for 18.10% and men for 81.90%.



3.1. PROFESSIONAL DEVELOPMENT

As reflected in our Human Resources Policy, the professional and human quality of the team is one of the greatest competitive advantages that allows the company to stand out on the market.

One of the Guiding Principles of this Policy champion attracting and retaining the best professionals, supporting their development, and maximising their skills, attending to their concerns and interests, and offering fair and competitive compensation.

3. PEOPLE IN DRAGADOS GROUP

In an increasingly competitive market and with the challenges of recruiting professionals with specific skill sets, the search for, attraction of, retention of, and development of talent are critical to an organisation's success. The Dragados Group remains dedicated to recruiting and integrating young, recently-qualified talent into its major construction projects. Currently, this programme includes 313 trainees, 238 of whom are working on national projects and 75 on international projects.

This program is designed to guide the learning and development of young professionals, offering them a chance to grow in the sector through a targeted training plan. It includes a monitoring and evaluation system to track their progress and integration into the company.

The recruitment of recent graduates primarily targets Master's degrees in Civil Engineering and Industrial Engineering, along with undergraduate degrees in Civil Engineering, Building Engineering, Industrial Engineering, and Business Administration or equivalent degrees, depending on the country.

Currently, this program is well-established and highly valued across various Dragados Group companies in Spain, the USA, Canada, the United Kingdom, Chile, and Poland.

In 2023, 113 new young professionals have joined some of the most prominent national and international projects.

YOUNG TALENT PROGRAMME

	Incorporated in 2023		Total December 2023	
	Engineers/similar	Economists	Engineers/similar	Economists
SPAIN	71	16	191	47
USA	16	1	44	5
CANADA	5		14	1
UK				2
POLAND	3	1	4	3
CHILE			1	1
	95	18	254	59
	113		313	

3.2. EVALUATION AND TALENT AT DRAGADOS GROUP

Obtaining information that will help attract and retain Talent (external and internal) is fundamental for the Dragados Group. Each Group company manages the development of this independently, adapting it to the specific characteristics of its activity.

For example, in Dragados USA and Canada, annual evaluations are carried out that affect the entire workforce, providing opportunities for staff to engage in their own development. These evaluations help in making decisions regarding potential internal staff transfers and in setting up tailored training and development programmes. It also allows to retain and consolidate the company's talent, anticipating company needs and employees' expectations.

Dragados' Evaluation and Talent Plan is another example. Its aim is twofold; on the one hand, to raise awareness about the professional situation of newly hired young workers in order to respond to their professional concerns and expectations and, on the other hand, to identify inter-

nal talent as they gradually gain experience. Assessing this group also enables us to adjust the specific plan designed for them to suit their training needs.

Each participant is assigned a tutor who will mentor them throughout the learning process. Dragados' Human Resources Departments are responsible for monitoring these employees. Regular assessment is carried out by means of questionnaires and personal interviews. These interviews are based on open-ended questionnaires covering skills and specific questions on training, experience, professional and geographical interests, and motivation.

Following evaluations throughout the year, we obtain a wide range of information that enables us to make decisions regarding staff mobility, career development, and promotions.

3. PEOPLE IN DRAGADOS GROUP



3.3. TRAINING

One of the Dragados Group's priorities is the development of its professionals, strengthening their skills and abilities, improving their employability through specific training plans in each country.

Employees are offered general training as a means of developing individual talent in all its aspects and specialised training in the sector to form the best teams of professionals.

Training responds to the continuous demands of business and society, fostering a commitment between the company and the workforce.

These training plans are updated annually and are adjusted to the local needs of each company in the Group. Internal and external audits are carried out on an annual basis, thus ensuring an optimal level and a continuous improvement process for the programmes.

Noteworthy training programs this year include courses on compliance (such as the international Human Rights course), Occupational Health and Safety, Sustainability, Building Information Modelling (BIM), and new technology projects.

In 2023, over 217,000 training hours have been carried out.

TRAINING	2022	2023
Total training hours	187,992	217,379
Total number of hours of training given to men	140,653	164,837
Total number of hours of training given to women	47,339	52,542
Total number of training hours taught to graduates and mid-level graduates	129,678	139,867
Total training hours for NON-certified technicians and administrative personnel	20,680	27,299
Total training hours taught to other personnel	37,634	50,213

The courses given are evaluated on the basis of the information generated through different surveys measuring participant satisfaction, content suitability, and practical application in the workplace, among other indicators. In this way, we assess the effectiveness of the training programmes.

At Dragados, the general satisfaction index with the training actions in 2023, according to the participants' assessment, is 3.6 (out of a maximum value of 4).

3. PEOPLE IN DRAGADOS GROUP



3.4. DIVERSITY, EQUAL OPPORTUNITIES, AND INCLUSION

All the companies forming part of the Dragados Group promote a culture of inclusion, diversity, and equal opportunities that guarantees the respect and protection of Human Rights in their field of activity.

The Dragados Group is committed to the principles of the United Nations Global Compact and Respect for Human Rights. It always guides the decisions in compliance with the applicable legislation, avoiding and remedying the negative impacts that may result from its own operations and business relationships.

The Group's relationship with its employees and their relationship with each other is based on compliance with, inter alia, the following commitments:

- **Equal opportunities and non-discrimination:**

The Human Resources policy is in line with framework and respects the Human and Labour Rights recognised by various international organisations, as well as the commitments set out in the Code of Conduct. This policy is underlined explicitly in one of the Guiding Principles:

- To guarantee equal opportunities, without any discrimination on account of age, sex, religion, race, sexual orientation, nationality or disability or any other circumstance or condition of a social or individual nature.

- In Dragados Group, personnel recruitment and promotion policies in no case involve discriminatory practices, and any form of harassment in the workplace is absolutely forbidden. Should any of these occur, the response from the company will be robust.

- **Eradication of forced or child labour**

Dragados Group undertakes the obligation that none of its branches and subsidiaries in other countries and none of its contractors engage in practices involving the use of forced or compulsory labour or child labour.

- **Diversity and inclusion**

It should be noted that the broad international presence makes up a multicultural team in which professionals of different races, ethnicities, ages, nationalities, languages, education, skills, religions and gender come together, which enables the company to successfully face the global challenges it faces on a daily basis.

The business understands the importance of local rootedness and, consistent with its purpose of promoting local development in the communities where it operates, our company promotes direct hiring of local employees and managers. In fact, approximately 99% of the Group's employees belong to local communities in which they operate.

3. PEOPLE IN DRAGADOS GROUP

The Group's commitment to these principles is firm and ongoing, and is reflected in the following points:

- Adopting the following priority objectives in the area of Diversity / Gender Equality in accordance with the Dragados Group's 2025 Sustainability Plan:
 - Increase the number of women in senior management positions by 25% compared to 2019.
 - The number of women in decision-making positions in 2025 should represent 20% of the total number thereof.
- In terms of gender, 100% of the Group's companies have adopted measures to promote equal treatment and opportunities for men and women.
- In this sense, Dragados España collaborates with various Foundations and Associations in order to fulfil these commitments in the area of volunteering. Spe-

cifically, a project is being carried out with the Escuela de Fortalecimiento de la Fundación Integra. In the United States, we collaborate with various associations that support socially excluded people, and in Poland and Spain, we carry out campaigns to collect toys and food.

- All Group employees are covered by protocols against sexual harassment.
- Measures have been adopted throughout the Group's companies to ensure equal opportunities and avoid discrimination in selection processes for any job position.

In the 2023 financial year, the percentage of women in management and leadership positions surpassed 19% for the first time, marking an improvement of nearly 2 percentage points compared to 2022.



3. PEOPLE IN DRAGADOS GROUP

3.5. WORK PLANNING AND WORK RELATIONS

In all the Group's work centres, we continue to adapt rigorous prevention measures to ensure the continuity of activity and the physical and mental health of our employees, as well as to promote the reconciliation of personal and professional life.

PATERNITY / MATERNITY	2022	2023
Number of paternity leaves	127	136
Number of men who returned to work after paternity leave	117	131
Number of maternity leaves	36	44
Number of women who returned to work after maternity leave	29	31

Among the measure that exemplify this interest, of particular note is that Dragados S.A. offers 1 hour of daily breastfeeding with the possibility of accumulating it over several days, or a reduction in working hours that is calculated annually rather than on a daily basis.

Dragados USA improves on the time established by law for maternity and paternity leave, complementing salary up to 100%.

The Dragados Group is aware that knowing the opinion of its staff allows it to detect areas of attention and create strategies for transformation and improvement, which have a positive impact on the company and its human capital. For this reason, in 2022 and in the first quarter of 2023, surveys were conducted among all employees in order to gather information on their perspective and perceptions of different aspects of the organisation.

The Dragados Group fully collaborates to promote human and labour rights recognised internationally, and respects and protects its professionals trade union freedom and the right of its professionals to join trade unions.

The percentage of employees in the Dragados Group who are members of trade unions in 2023 is 14.20%, while in Spain, 100% of employees are covered by the collective bargaining agreement applicable in their sector and geographical area. These collective bargaining agreements establish minimum notice periods for significant operational changes established by law for any change affecting the rights or working conditions of employees, on an individual or collective basis, and are rigorously complied with by Dragados Group.

In addition, Dragados has an Ethics Programme through which any employee or third party who wishes to make

a query related to the Code of Conduct, Policies, or Regulations, or has knowledge of a breach thereof, or of any unlawful act committed in the Company, whether criminal, antitrust, or of any other nature, can inform the company with full guarantees and without fear of suffering any retaliation.

Another consolidated measure in Dragados Group is the Life and Accident insurance offered to its employees. The Human Resources Departments are responsible for ensuring compliance with all obligations regarding social benefits; these may include the contracting of Life, Accident, and/or Health insurance depending on the different national and international locations in which the Dragados Group operates.

In addition to the obligatory measures established by law in each country concerning social security, employees are offered diverse options to improve upon them.

At Dragados España, all employees with an indefinite employment contract are covered by Life and Accident insurance policies in addition and complementary to those included in the labour legislation and Collective Bargaining Agreements applicable to each sector and geographic region. Employees have the option of purchasing private health insurance as part of a Flexible Compensation Programme (SALARIFLEX). This voluntary programme allows access to clinics and doctors not covered by Public Health Care, with better price conditions by belonging to a large group, in addition to enjoying tax benefits.

All employees working outside Spain due to the group's needs are covered by health insurance policies that cover the employee and their family members who have moved with them abroad, also covering possible repatriation expenses in case there is an accident outside the working environment.

3. PEOPLE IN DRAGADOS GROUP

In subsidiaries that operate in the United States and Canada with Social Welfare Systems not covered by Government programmes, the local Human Resources Departments cover these services for employees through Health Insurance that offer different insurance

and coverage alternatives through pension planes such as the 401K plan in the United States, which lets U.S. Subsidiary employees decide which scheme they would like to use for their retirement plan contributions.



4. WORKPLACE HEALTH AND SAFETY

4. WORKPLACE HEALTH AND SAFETY

Dragados Group is firmly committed to implementing a positive preventive culture in which Health and Safety plays an important and central role for those who belong to the organisation, with the aim that all employees should return home every day in the same conditions in which they came to work. This positive preventive culture is materialised through the Safe and Healthy strategy and is monitored through a set of indicators common to all Dragados Group companies, thus making it possible to measure their performance in Health and Safety. Our performance indicators do not only measure negative results

linked to the accident rate of the companies, but we also measure proactive indicators that provide an idea of the companies' commitment to Health and Safety-leadership visits, Health and Safety training, improvement actions, among others- and allow for continuous improvement and for establishing global strategies and campaigns.

As part of this commitment, investment in occupational health and safety amounted to 1,106 euros per employee during the 2023 financial year. This means an 8% increase in 2023 compared to 2022.

	2019	2020*	2021*	2022	2023
Investment in health and safety (millions of euros)	23.04	25.05	27.74	21.73	25.40
Expense per employee (euros)	963.5	1,144.8	1,274.40	1,021.00	1,106.5

* Data affected by Covid 19

For the purpose of ensuring effective Health and Safety management, 100% of Dragados Group's companies have put in place Health and Safety systems in the workplace. In order to guarantee their proper implementation and management, in companies covering 100% of the Group's employees, the Health and Safety systems are subject to periodic reviews conducted by internal and external audit teams. In this regard, throughout 2023, 100% of the group's companies maintained their respective ISO 45001 certification. Management system certification is one of the key objectives of the ACS Group's 2025 Sustainability Master Plan, and Dragados Group companies keep 100% of the workforce covered, thereby making a definitive contribution to achieving said Plan's objective.

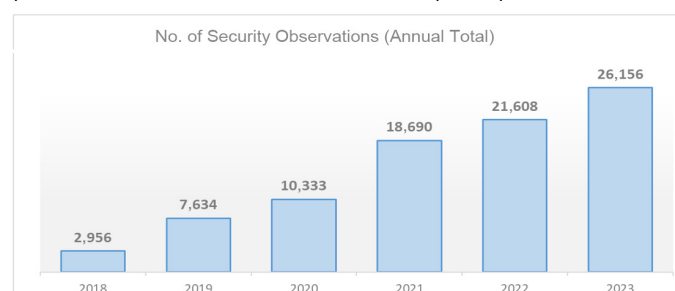
The Group companies have their own health and safety management systems and their activities include the following procedures:

- Periodic assessment of the risks to which individuals at our work centres and construction sites are exposed.
- Definition of risk prevention plans with formal objectives that are both quantitative and qualitative, that allow performance evolution to be measured objectively and incorporate improvements identified in evaluation processes.
- The integration of action plans to respond to situations of risk.
- Processes for the identification and recording of situations that could have led to an incident (near-misses), as well as procedures for the investigation of incidents.

- Workers' and managers' remuneration is linked to compliance with formal health and safety targets.
- Programmes for periodic reviews and implementation, where necessary, of appropriate mitigation and monitoring measures for risk reduction.

An example of the degree of consolidation of this positive culture within the Group's companies is the indicator that shows the number of Safety Comments reported by the people working on our sites and in our workplaces. Like other leading Indicators, this indicator is monitored and compared to its target. During 2023, this indicator has continued to grow, demonstrating the importance given by the Group of companies to health and safety communications. It also indicates the success of the measures to improve and facilitate the flow of information. The annual performance of this indicator demonstrates the commitment of the people and of the company to detect and eliminate risks and to continuously improve.

Supervising and optimising these occupational health and safety systems means setting annual targets that have been approved by the company's Senior Management. These indicators are continuously monitored to prevent possible deviations and to ensure prompt action where



4. WORKPLACE HEALTH AND SAFETY

necessary. The targets are set on the basis of existing indicators for each company, but with common thresholds where all of them promote continuous improvement based on a common standard. This provides insight into individual and overall company performance, allowing for appropriate decision making. The conclusions of this monitoring are gathered in periodic meetings to establish action guidelines towards reaching set targets.

Meeting our zero-accident target is becoming ever closer thanks to the work of our Health and Safety Services in the companies and the commitment of our workers, contractors and collaborating companies or suppliers.

On the other hand, as part of its commitment to the safety and well-being of its employees inside and outside the workplace, the Dragados Group facilitates health care for the people who work in the Group's companies. The possibility of accessing insurance or other health care services is becoming increasingly common. Examples of the latter could be the development of vaccination campaigns or the promotion of preventive medicine by offering comprehensive medical check-ups including non-work related diagnostic tests such as analysis of tumour markers and various analytical parameters.



4. WORKPLACE HEALTH AND SAFETY

USE OF NEW TECHNOLOGIES IN DRAGADOS TO PREVENT ACCIDENTS

Pedestrian Detection System for Large Construction Machinery

To enhance health and safety in work areas where moving machinery and workers are present, the Dragados Group has introduced a technological tool in 2023 designed to detect pedestrians near machinery. A solution has been developed that can be mounted on machinery known for making quick movements or turns and with limited visibility from the operator's position.

The approved measure involves a camera system equipped with artificial intelligence algorithms and continuous learning capabilities. This system detects individuals near the machinery and alerts the operator to their presence.

The resulting system is user-friendly and can be easily configured for installation on any type of machinery, whether it is used on-site or rented/subcontracted, regardless of its duration of stay.



Technological Solutions to Enhance Training Activities

Each year, advancements are made in developing new training initiatives that offer higher quality and more effective results, with increased worker engagement and participation.

Some of our projects have implemented 360-degree immersive training environments featuring room-scale, user-friendly displays. These spaces enable custom simulations of hazardous or hard-to-access scenarios, eliminating risks for participants. They provide a more engaging and effective learning experience compared to traditional flat-screen desktop setups. In contrast to VR headsets, this setup offers a collaborative environment where entire teams can engage and interact together at the centre stage.

Equipped with surround sound and vision, this setup recreates realistic scenarios for the entire group, facilitating their ability to see, understand, discuss, and manage all aspects of the training.

These immersive shared spaces have been utilised to enhance onboarding and induction processes, as well as to cultivate new skills. It is particularly effective for training in high-risk areas such as work at heights, confined spaces, first aid, emergency procedures, and fire safety.

Other advanced systems used in occupational risk prevention training include visualisation devices and VR headsets. These technologies immerse users in a digitally generated environment that creates highly realistic scenarios. Through interactive, first-person experiences, trainees can engage with situations and risks as if they were actually present, all without incurring additional risks.



4. WORKPLACE HEALTH AND SAFETY

4.1. TRAINING

Dragados Group considers that an essential pillar of action for effective occupational health and safety management is training and awareness-raising on this subject for all those who are part of the Group. This is evidenced by the fact that 100% of Dragados Group employees receive training in occupational Health and Safety at the beginning of their careers in the company, and this training is complemented or renewed throughout their careers, so all individuals receive training throughout their careers.

This translates into more than 90% of individuals employed by the Dragados Group received health and safety training over the course.

	2020	2021	2022	2023
Employees who have received health and safety training during the year (%)	89.9	89.5	88.2	89.80
Employees who have received health and safety training during their career with the company (%)	100%	100%	100%	100%

Dragados Group has various health and safety training programs for people working in the organisation. On the one hand, there are basic courses on general knowledge such as first aid, occupational risk prevention or emergency and evacuation plans, among others. An important part of the training activities is focused on safe work procedures according to the activities that take place on site, but without forgetting the those who carry out their work in offices, who also receive training in ergonomics.

Noteworthy among the training courses are those focused on skills development and mental well-being, such as leadership and emotional health, which are increasingly emphasised in the training plans of the Group's companies.

The Dragados Group also partners with organisations specialising in occupational safety, health, and risk prevention, and actively participates in national and international congresses, conferences, and forums.



4. WORKPLACE HEALTH AND SAFETY

THE TRAINING OF OUR COLLABORATING COMPANIES

Dragados Group shows its commitment to the health and safety of its suppliers, contractors, and collaborating companies by providing training to ensure that they are aware of all the measures required to carry out their activities in a safe manner.

All personnel joining a construction site must have the necessary training to perform their work safely. Upon arrival, they also receive our Corporate Induction, during which they are informed about our risk prevention

principles and culture, as well as the relevant health and safety information for that site.

Employees of collaborating companies also participate in site kick-off talks and in any other specific information or training activity that may be of interest for them to carry out their work safely. Over 280,000 hours of contractor training hours were recorded by Group's companies in 2023, an increase of 30% over the previous year.



4.2. SAFETY STATISTICS

The Health and Safety of people at work is one of the fundamental strategic pillars of the Dragados Group's sustainability strategy. The ongoing efforts that all Group companies make in the area of Health and Safety have a clear impact year after year on improving accident rates. The

decrease in incident and frequency indexes in 2023 shows how effective the measures taken by our Health and Safety teams have been, and reinforces the declining trend recorded in recent years.

ACCIDENT RATES, COMPANY PERSONNEL	2021	2022	2023
Frequency (1)	4.57	4.23	3.44
Severity (2)	0.13	0.17	0.10
Incidence (3)	7.76	7.19	5.84

(1) Frequency Index: Number of accidents occurring during the working day for every million hours worked.
(2) Severity Index: Number of days lost due to accidents for every thousand hours worked.
(3) Incidence Index: Number of accidents with sick leave for every thousand workers.

Every company in the Group monitors these indexes exhaustively, reporting them on a monthly basis so as to be able to assess how effective the measures adopted have been. All significant accidents and incidents, or those that

could have been significant, are investigated in depth to establish the causes and be able to adapt preventive measures, learning from experience and preventing recurrence.

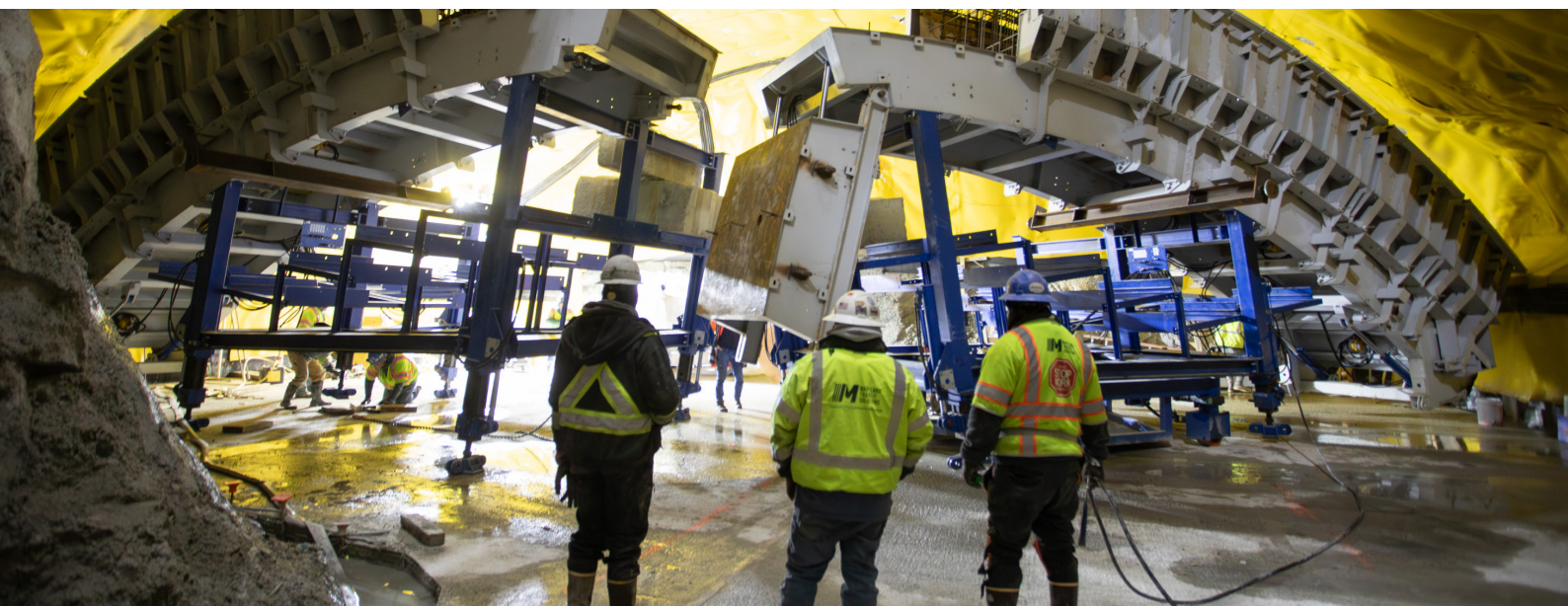
4. WORKPLACE HEALTH AND SAFETY

The main types of work-related injuries that occur to Dragados Group employees are linked to overexertion, impacts, or contusions, as well as cuts or other injuries resulting from the use of tools and work equipment. These injuries are usually the result of handling objects or tools,

slipping or tripping with or without falling, and losing control of objects and tools.

In 2023, there were only two cases of occupational diseases in all group companies.

	2021	2022	2023
Total number of cases of occupational diseases (Employees)	0	1	2



4.3. ACCIDENT RATES. CONTRACTING PARTNERS

Another key action line pursued by the Group in this area is to spread our preventive culture among suppliers, contractors, and collaborating companies. The Group continuously monitors the health and safety conditions of these stakeholders and keeps track of the accident rates associated with them. The main types of work-related injuries

and occupational illnesses have the same causes as those described for employees carrying out similar activities.

It is also important to note that the Occupational Health and Safety Policies of Group companies also apply, where applicable, to Business Partners, including contracted companies acting for or on behalf of our companies.

CONTRATISTAS	2020	2021	2022	2023
Frecuencia	8.48	7.58	7.89	7.50
Gravedad	0.09	0.06	0.27	0.25

2023 saw no cases of occupational diseases among contractors or deaths due to this motive..

	2021	2022	2023
Total number of cases of occupational diseases (Subcontractors)	0	0	0

4. WORKPLACE HEALTH AND SAFETY

4.4. HEALTH AND SAFETY RISK MANAGEMENT

Dragados Group companies develop their Health and Safety Policies on the basis of a common policy, in accordance with their characteristics, needs, and geographical scope. These policies are supported and reviewed by the top management in accordance with ACS Group's ultimate target, which is a zero-accident target.

To this end, the result of the risk map and the tangible analyses carried out by the ACS Group are taken into consideration, with risks prioritised according to their relevance and the impact they may have on the activity of the company and applying the measures established therein.

1. Commitments of the 2025 Sustainability Master Plan for accident reduction:
 - I. Assessment and control of risks that cannot be eliminated.
 - II. Planning preventive activities at all levels, establishing the necessary measures to work safely and healthily.

- III. Setting annual targets that are reviewed regularly.
2. Management systems that are kept updated and approved by the Senior Management of each of the companies.
3. Working with organisations and taking part in congresses and activities on the subject.
4. Working with partners and subcontractors that:
 - I. Respect internationally recognised human and labour rights.
 - II. Undertake our commitment to provide a safe and healthy work environment, in compliance with applicable regulations on Occupational Health and Safety.



5. COMPLIANCE MANAGEMENT SYSTEM

5. COMPLIANCE MANAGEMENT SYSTEM

5.1. HEALTH AND SAFETY RISK MANAGEMENT

Since 2018, DRAGADOS has had a Global Compliance Management System with a comprehensive vision and a cross-cutting structure from the outset, not limited to the criminal sphere. In this way, the Global Compliance Management System has gradually expanded its scope to currently encompass criminal and anti-bribery compliance, competition law, cybersecurity, human rights due diligence and, in general, any other area of compliance that the Board of Directors deems should be covered by the Compliance Management System.

Having defined the scope of the System, its main elements are as follows:

- DRAGADOS Code of Conduct, latest version approved March 2023, which sets out the ethical principles governing the company's actions.
- Code of Conduct for Business Partners, the latest version approved March 2023, which sets the minimum standards of behaviour that DRAGADOS business partners must comply with.
- Criminal Risk Prevention Policy, the latest version approved March 2023, which defines and establishes the principles of action of the Compliance Management System in criminal.
- Anti-Corruption Policy, the latest version approved March 2023, which establishes a regulatory framework and basic rules for the prevention and detection of corruption and bribery activities in the company's operations.
- The Competition Policy, anticipated for approval by the Board of Directors in March 2024, outlines and establishes the principles governing the Antitrust Compliance Management System.
- ACS Information Security Policy, the latest version approved in September 2022, which defines the basic principles and rules for information security management.
- ACS Human Rights Policy, the latest version approved in September 2022, which establishes the commitment to respect internationally recognised human rights.
- The Compliance Function comprising the Compliance Directorate and the Compliance Committee.
- Risk and Control Matrices in the different compliance areas, which identify compliance risks and list measures to prevent, detect, and manage them.
- The policies, procedures, processes and other internal regulations that make up the regulatory body of the Global Compliance Management System.
- The actions of planning, operation, supervision, and reporting with respect to each of the elements of the System are managed by the Compliance Committee in permanent connection and relationship with the rest of the company's business areas and, where appropriate, with the Board of Directors and Senior Management.
- The DRAGADOS Ethics Channel, which allows any person authorised to do so to report irregularities or non-compliance with the provisions of the DRAGADOS Code of Conduct and the Policies that develop it; and
- The disciplinary system to be applied in cases of non-compliance or non-compliance with regulations under the scope of the Global Compliance Management System.



5. COMPLIANCE MANAGEMENT SYSTEM

5.2. THE DUAL RISK CONTROL MODEL: SPECIFICATION OF HEAD OFFICE'S CARE DUTIES TOWARDS SUBSIDIARIES

To promote the adoption of a model of compliance management by subsidiaries which can be understood as robust, the Dragados Group parent has developed a dual control system:

- a. The implementation and development of a uniform standard system for the subsidiaries aiming at having all subsidiaries of the group with a certified Compliance management system or one that can at least be certifiable. This system will make it possible to detect the subsidiaries with weaknesses and which do not reach the minimum uniformity requirements of the group. This will provide a system that monitors the risk arising from the subsidiaries as a whole, which in turn will make it possible to detect where there is greater exposure to the indirect risks arising from them.
- b. Biannual monitoring to detect those cases in which non-compliances or infringements have been reported or the occurrence or existence of risks has been confirmed, also monitoring whether the subsidiary has reacted appropriately regarding the specific case by detecting the deficiencies in the system, carrying out corrective actions and the measures to resolve them (internal investigations and their results, modification of rules, improvement of checks, etc.).

In accordance with the highly decentralised management model of the Dragados Group, the Group's parent company promotes the adoption of its own specific compliance management model by each of the subsidiaries, aligned with common regulatory standards and policies. This is why the Global Compliance Report is used among Group companies to assess the risks that the independent compliance management system of each one represents for the parent. In this way, the parent has at least one mechanism to be informed of and understand the risks to which it is exposed so that its directors comply with their general duty of control and diligence.

This information enables to deal with the indirect risks arising from the subsidiaries by implementing and developing a second line of checks of its own, complementary to the specific procedures of the subsidiaries.

This allows for average intensity control without daily involvement in the compliance management of the subsidiary based on a system of reporting from the subsidiary to the parent. The standardised reporting system at the group level makes it possible to substantiate the existence of due control by the parent with regard to subsidiaries, promoting the adoption of own compliance management

systems by subsidiaries without prejudice to the parent's supervisory and control function.

For this purpose, an existing tool which, in its latest version as of December 2023, includes the following sections:

- I. Criminal and anti-bribery compliance obligations.
- II. Staff Compliance and Responsibilities.
- III. Business partners. External due diligence and risk assessment.
- IV. Compliance training and communication.
- V. Controls, targets and resources.
- VI. Auditing and monitoring.
- VII. Ethics channel.
- VIII. Internal investigation procedure.
- IX. Disciplinary system.
- X. Breaches, analyses and corrective actions.
- XI. Competences.
- XII. Cybersecurity.
- XIII. Environmental due diligence processes.
- XIV. Human Rights due diligence processes.
- XV. Tax compliance.
- XVI. Corporate Governance.

The Global Compliance Report, which is sent by the Group's subsidiaries every six months, is supplemented by the Dragados Group's Risk and Criminal Controls and Anti-Bribery Matrix, which includes both the risks to which the listed individual company is exposed due to its own activity, and the risk to which it is indirectly exposed through the criminal risks of the activities of its subsidiaries.

The Global Compliance Report also makes it possible to obtain an annual Risk Score Card in all areas of compliance reported.

5. COMPLIANCE MANAGEMENT SYSTEM

5.3. UPDATE OF COMPLIANCE POLICIES AND PROCEDURES

Dragados' main Compliance policies and procedures are available to all stakeholders and business partners on the corporate website: www.dragados.com. The Board of Directors, in conjunction with Dragados' Compliance Committee, ensures that these policies and procedures are permanently reviewed to ensure they are adequate and that they are actually applied, avoiding, at all times, any situations that may affect the company's credit and reputation.

In 2023, primarily due to the updates in the Compliance Management System for both criminal and competition matters, and the enactment of Law 2/2023 of February 20, which regulates the protection of whistleblowers and combats corruption, the company's regulatory framework has undergone significant revisions. Notable updates include:

- A **new version of the Code of Conduct** was released in March 2023, communicated to the entire organisation, and published on both the intranet and the corporate website.
- The **new version of the Code of Conduct for Business Partners** was released in March 2023, communicated to the entire organisation, and published on both the intranet and the corporate website.
- The **new version of the Criminal Risk Prevention Policy** was released in March 2023, communicated to the entire organisation, and published on both the intranet and the corporate website.
- **The updated Anti-Corruption Policy** was introduced in March 2023, communicated across the organisation, and made available on both the intranet and the corporate website.
- **The updated Policy on Gifts, Presents, Entertainment, and Favours** was released in March 2023, communicated to all employees, and published on the corporate intranet.
- **The revised Ethics Channel Operating Policy** was issued in September 2023, communicated to all employees, and published on both the intranet and the corporate website.
- **The new Communications Management Procedure** was received in September 2023, communicated to all employees, and published on the corporate intranet.
- **The updated Disciplinary System** was introduced in June 2023, communicated to all employees, and published on the corporate intranet.
- **The updated Procedure for Monitoring Meetings and Contacts with Competitors** was released in September 2023. It has been communicated to all employees and published on the corporate intranet.
- **The updated Operating Regulations of the Compliance Committee** were issued in September 2023. These updates have been communicated to all employees and made available on the corporate intranet.
- **The updated Compliance Management Manual**, released in September 2023, has been distributed to the entire organisation and is available on the corporate intranet.
- **A new Competition Policy** is scheduled for release in March 2024. This policy will be communicated to the entire organisation and published on both the intranet and the corporate website.



5. COMPLIANCE MANAGEMENT SYSTEM

5.4. FIGHTING CORRUPTION AND BRIBERY

In the area of Criminal and Anti-Bribery Compliance, the Code of Conduct and the DRAGADOS Code of Conduct for Business Partners are further complemented with the Corporate Criminal Offence Prevention Policy and the Anti-Corruption Policy. Both policies are aligned with the national standard UNE 19601 on criminal compliance management systems and ISO 37001 on anti-bribery management systems.

In the 2023 financial year, all the objectives set in terms of criminal and anti-bribery compliance were met, mainly through the improvement and strengthening of the matrix of criminal and anti-bribery risks and controls, by updating the determination of the applicability of the risks and controls associated with each type of crime, verifying the effectiveness of the latter, for the final reduction of the current residual risk corresponding to each crime defined in the model.

The updating and review of the matrix of criminal and anti-bribery risks and controls was completed in May 2023, determining the nature and extent of the criminal and an-

ti-bribery risk faced by DRAGADOS, identifying that the real residual risks had been reduced, which was subsequently validated and confirmed by the audit and certification reports of Aenor. Additionally, with the implementation of Organic Law 3/2023 of March 28, amending Organic Law 10/1995 of November 23 on animal cruelty, and Organic Law 4/2023 of April 27, amending Organic Law 10/1995 of November 23 on offences against sexual freedom, new criminal offences applicable to legal entities have been incorporated and updated in the compliance matrix. In both cases, these are cross-cutting risks that affect the entire organisation.

Furthermore, as established in the Dragados Group's Code of Conduct in relation to the fight against corruption, the companies of the Dragados Group will ensure compliance with these requirements, also avoiding any transaction that could be interpreted as a donation in favour of political parties or individual politicians, whether in cash or in kind. Donations or sponsorships to entities apparently not linked to political parties or public officials should not fundamentally infringe the provisions of this Code of Conduct.



5. COMPLIANCE MANAGEMENT SYSTEM

5.5. HUMAN RIGHTS

The Dragados Group has the mission to contribute to the development of society and future generations through its services and operations, ensuring at all times maximum respect for internationally recognised human rights (HR) in its global activity, in line with the ten principles of the UN Global Compact to which the Group is a party.

The main commitments in this area are set out in:

- The ACS Group's and Dragados' Code of Conduct, which establishes the performance guidelines expected of all members of the Company as an essential part of its mission, values and corporate culture.
- The ACS Group's and Dragados' Codes of Conduct for Business Partners, which must be complied with by all its business partners regardless of their geographical location or the Group company with which they maintain their contractual relationship.
- The ACS Group's Sustainability Policy, which establishes the ACS Group's environmental and social policy principles, as well as the Group's relationship with its environment.
- ACS Human Rights Policy, which establishes the responsibility to respect internationally recognised human rights, formalising a due diligence process to identify, prevent, mitigate and remedy adverse impacts that occur within the scope of its activity and global value chain, as well as being accountable for the effectiveness of this process.
- The ACS Group's Protocol on Human Rights Due Diligence, which serves as the backbone of the system, establishing the approach and due diligence responsibilities required by ACS for all its employees, Divisions and Business Partners, providing the means to ensure and verify compliance.

These standards constitute the essential pillars on which The Dragados Group continuously applies due diligence processes in its operation and global value chain, ensuring their compliance with applicable law in each jurisdiction and with relevant international reference frameworks: the International Bill of Human Rights, the core International Labour Organisation conventions, the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises, and the Tripartite Declaration of Principles on Multinational Enterprises

In order for Dragados Group to adopt the obligations derived from previous regulations, it has a Due Diligence System regarding Human Rights through an analysis of

the risks in this area, taking into account both the context of the countries of operation as well as the activities carried out by the companies of the Group, which allows the Dragados Group to guarantee that it has the management capacity, tools, and commitments necessary to act with due diligence in its global commercial relationships and operations, while respecting internationally recognised Human Rights at all times, as well as applicable laws on these matters.

The System is based on the 'Protect, Respect and Remedy' pillars of the UN Guiding Principles. Thus the identification, prevention, mitigation, monitoring and remediation of potential adverse effects on human rights related to the activity of Dragados (as a result of, contribution and or direct and indirect association) is facilitated, and the processes to handle any complaints or claims that may be made by those who have been the subject of this conduct and/or their legitimate representatives are defined.

All subsidiaries and branches are asked annually, through the monitoring and reporting system that DRAGADOS has in the domain of Human Rights, to report on a series of Human Rights indicators, as well as on any changes that may have occurred in terms of risk analysis and the identification of mechanisms. With this information, annual human rights objectives and improvement actions are set out and compliance with them is monitored. During 2023, this process has already been implemented in all national and international subsidiaries and branches.

The results detailed in Chapter XIV of the Global Compliance Report enable us to assess the level of HR compliance risk faced by the Dragados Group. It can be concluded that Dragados, along with its subsidiaries and branches, is well-positioned to meet future regulatory requirements in HR Due Diligence on a global scale, which are expected to become applicable in the medium term.

However, it is crucial that all companies and branches within the Dragados Group continuously expand and strengthen processes, both in their direct operations and throughout the global value chain.

During the 2023 financial year, 100% of the DRAGADOS Group's operations have been assessed throughout the life of the project, meeting the target set by the Dragados Group in the 2025 Sustainability Master Plan for 100% of its own operations to be assessed in terms of Human Rights by that date.

It is worth noting that during 2023, no complaints were filed against DRAGADOS or its subsidiaries and branches for human rights violations, having, in any case, reinforced the guidelines of the Protocol in the area of detection and

5. COMPLIANCE MANAGEMENT SYSTEM

remedying adverse impacts to which the Group may have contributed within the scope of its responsibility. Thus, in 2023, no remedy measures were necessary as there were no non-compliances or non-conformities in this area.

Throughout 2023, the various companies within the Dragados Group have focused on ensuring the effectiveness and continuous improvement of human rights protections, both in their direct operations and across their entire supply chain.



5. COMPLIANCE MANAGEMENT SYSTEM

5.6. ENVIRONMENTAL DUE DILIGENCE

The Dragados Group has a firm commitment to environmental protection and the proper management of the expectations of its stakeholders in this regard, in accordance with the strategic lines defined in the Environmental Policy, the ACS Group's Sustainability Policy, Code of Conduct and Code of Conduct for Business Partners.

In 2022, the risks associated with Environmental Due Diligence were included for the first time as a cross-cutting management element within its Corporate Governance model and Global Compliance Management System.

This section contains information on the non-financial risks associated with the Group's due diligence compliance responsibilities. Detailed information on the Group's environmental management framework can be found in section 2. of this report.

The Dragados Group also included Chapter XIII "Environmental Due Diligence Process" in the 2023 Global Compliance Report, including 10 questions relating to the state of performance on environmental matters, designed to influence the early identification of environmental risk associated with possible non-compliance with the Dragados Group's internal policies, the main international standards and the regulations applicable in the countries in which the various Dragados Group companies operate.

In October 2023, an independent expert carried out the Annual Environmental Compliance Monitoring Report based on the "Risk Scorecard" method. The purpose of this report is to estimate the environmental compliance risk to which Dragados Group companies are exposed and to facilitate its mitigation through the definition of the specific action plans to be addressed by each company for the continuous improvement of its performance in this area, representing a new environmental compliance assessment model for Dragados Group companies.

This evaluation has been carried out on the information reported by the DRAGADOS Group companies to Chapter XIII of the Global Compliance Report questionnaire, aimed at addressing the most demanding regulatory frameworks in this area, among which the following should be highlighted:

- The Environmental Policy for Dragados, applicable to all Group companies
- The 2025 PDS- 2025 Sustainability Master Plan
- Regulation (EU) 2020/853 of the European Parliament and of the Council of 18 June 2020 on Taxonomy. The regulation establishes the criteria for determining whether an activity is considered environmentally sustainable in order to establish the degree of environmental sustainability of an investment.
- Law 7/2021 of 20 May on climate change and energy transition, article 32 of which introduces disclosure obligations on the assessment of the financial impact on society of the risks associated with climate change, including the risks of the transition to a sustainable economy and the measures adopted to address these risks.
- The Task Force on Climate-related Financial Disclosure (TCFD). Framework of recommendations to disseminate the measurement, control and management of risks related to climate change.
- ISO 14001 on Environmental Management Systems.

The findings in the Report enable an assessment of environmental compliance risks for each individual company as well as for the Dragados Group as a whole. It is clear that all Dragados Group companies must continuously expand and strengthen their processes, both in their direct operations and throughout the global value chain.



5. COMPLIANCE MANAGEMENT SYSTEM



5.7. SAFETY OF INFORMATION

The Dragados Group, in alignment with its Corporate Information Security Policies and business objectives, employs comprehensive mechanisms and tools to ensure the confidentiality, availability, and integrity of its information. The technologies implemented for this purpose have been continuously updated to enhance our security, resilience, and incident response capabilities.

These initiatives, carried out in 2023, have adhered to our Security Master Plan. They focus on safeguarding the workplace and personal identities, as well as strengthening global IT security measures to enhance access control and prevent unauthorised access. To validate the effectiveness of the measures implemented

for continuous improvement, both internal and external penetration tests have been conducted. We have monitored the applied controls and continued efforts in digital surveillance, assessing our exposure to external threats. Additionally, we have focused on enhancing security awareness among our personnel through awareness campaigns and informational sessions on potential attack methods, including phishing, vishing, smishing, and malicious QR codes.

The Dragados Group maintains ongoing monitoring of implementation across its subsidiaries and branches. The progress is reported biannually in Section XII of the Global Compliance Report, specifically focusing on Cybersecurity.

5. COMPLIANCE MANAGEMENT SYSTEM

5.8. COMPETITION COMPLIANCE MANAGEMENT SYSTEM

The ACS' Board of Directors approved on 28 July 2022 the latest version of the ACS Competition Compliance Policy and Protocol. It is anticipated that in the first quarter of 2024, the Dragados Group will approve a Competition Policy, which will serve as the core framework for ensuring adherence to competition regulations across the Group.

In 2023, Dragados and its national subsidiaries continued to update their Compliance Management Systems to align with ACS's Competition Compliance Policy and Protocol, the CNMC's Guide to Competition Compliance Programs, and UNE 19603 on Management Systems for Competition Matters. By 2024, Dragados and all its national subsidiaries plan to achieve certification for their Compliance Management Systems in accordance with UNE 19603.

In 2023, all international subsidiaries updated their Compliance Management Systems for competition matters. Notably, significant revisions were made in the USA and Canada to ensure compliance with the ACS Competition Compliance Policy and Protocol. These updates align with the Antitrust Division of the Department of Justice's Evaluation of Corporate Compliance Programs in Criminal Antitrust Investigations in the USA, and the Bulletin on Corporate Compliance Programs of the Competition Bureau in Canada.

Similarly, throughout 2023, the Dragados Compliance Committee has enhanced and strengthened the oversight of competition compliance programs across all Dragados Group companies and branches through the following actions:

Improvements to the section of the Global Compliance Report questionnaire concerning competition compliance programs:

- a. More questions were asked, focusing on the involvement of directors and executives in the programme, training, complaints channel, compliance officer, risk map, control matrix and disciplinary system/incentive system among others.
- b. Overall scope of the assessment of competition compliance programmes, taking into account the compliance guidelines of competition authorities in Canada, Spain and the USA.

The improvements made to the questionnaire also aim to assess the effectiveness of competition compliance

programmes taking into account the compliance guidelines of the competition authorities of the countries in which Dragados Group subsidiaries are active.

To determine the robustness of the programmes of Spanish subsidiaries, the CNMC's Competition Compliance programme Guide and the ACS Group's Competition Compliance Policy and Protocol were taken into account.

For the major subsidiaries of the Dragados Group based outside Spain, the guidelines from their respective national competition authorities have been taken into account alongside the ACS Competition Policy. Specifically, the guidelines on compliance of the competition authorities of the following countries were taken into account for this analysis:

- Canada: Competition Bureau of Canada Bulletin on Corporate Compliance Programs.
- USA: Antitrust Division of the Department of Justice's Evaluation of Corporate Compliance Programs in Criminal Antitrust Investigations.

These rules are important because they establish the requirements that a competition compliance programme must meet to be considered effective by the competition authorities. If a company has a solid programme that meets the conditions of these guides, the probability of committing a competition breach will be minimised. If committed by any worker, in breach of the programme, the Company may take remediation and corrective measures on time. If the authority initiates an investigation against the company, having an effective competition compliance programme can lead to a reduction in the amount of the potential fine. In addition, it may also serve to lift a potential ban on engaging with the public authorities as a result of the company's commission in the past of a competition breach.

The analysis of the responses to the Global Compliance Report reflects the progress in the competition compliance programmes of each subsidiary and branch, which are analysed by the Compliance Committee to formulate individualised recommendations, as well as the proposal of a specific work plan for each of them to reinforce and improve their competition compliance programme.

5. COMPLIANCE MANAGEMENT SYSTEM

5.9. TAX COMPLIANCE

During 2023, Dragados continued to oversee and refine its internal tax control policies and procedures. This included assessing the effectiveness of tax controls implemented by the parent company, ACS Actividades de Construcción y Servicios, S.A. These efforts were aligned with the Corporate Tax Policy, the Internal Tax Control Standard (NCIF), and Dragados' own internal tax control procedures, which were updated and approved by the Board of Directors on July 28, 2022.

These procedures were reviewed by an independent external consultant, who concluded the following:

- Procedures are properly documented.
- The main tasks have been attributed and it is possible to identify who has been assigned to carry them out.
- The procedures include certain controls to review their proper implementation.



5. COMPLIANCE MANAGEMENT SYSTEM

5.10. TRAINING

	2022	2023
Scope of training plans on Human Rights, Ethics, Integrity, Conduct, or other compliance policies and procedures (% employees)	94.51%	94.68%
Number of employees trained in Human Rights, Ethics, Integrity, Conduct, or other compliance policies and procedures	5,683	5,628

All Dragados Group companies provide training to all members of their organisation on a regular basis as soon as they join, in accordance with the provisions of the Annual Training Plan, which includes the compliance training actions proposed by the Compliance Committee. This training is appropriate to the roles of staff and the compliance risks to which they are exposed. The effectiveness of all training activities is evaluated and regularly reviewed to ensure that they are up to date at all times.

Similarly, Dragados Group subsidiaries and branches ensure that procedures are in place to address compliance awareness and training for third parties acting on their be-

half who may pose a compliance risk to the organisation. Training records are kept as documented information.

During the 2023 financial year, driven by the Compliance Committee, targeted training was provided to members particularly exposed to various types of risks within the organisation. This training focused on areas such as criminal and anti-bribery risks, antitrust, conflict of interest, and human rights.

Specific training on conflict of interest was conducted by an external criminal law specialist for staff members and Board of Directors who are particularly exposed to these risks.



5. COMPLIANCE MANAGEMENT SYSTEM

5.11. CHANGES IN THE INTERNAL AND EXTERNAL CIRCUMSTANCES OF THE ORGANISATION

During 2023, the following changes in the legal or regulatory context have occurred, which are considered significant external circumstances for the organisation:

As for external factors:

Regulatory and Policy Changes in Financial Year 2023:

- The Organic Law 6/2022 of July 12, which complements Law 15/2022 of July 12 on comprehensive equal treatment and non-discrimination, and amends Organic Law 10/1995 of November 23, on the Criminal Code, has led to an update of the Catalogue of Prohibited Conduct and behavioural expectations within DRAGADOS.
- Organic Law 10/2022, of September 6, on Comprehensive Guarantees for Sexual Freedom, amends Organic Law 10/1995, of November 23, on the Penal Code. This update introduces, among other changes, the criminal liability of legal entities for offences related to sexual harassment and violations of moral integrity. As a result of the aforementioned Law amending the Spanish Penal Code, DRAGADOS has updated its Catalogue of Prohibited Conduct and Behavioural Expectations accordingly.
- Directive (EU) 2022/2464 of the European Parliament and Council, dated December 14, 2022, on sustainability reporting by companies (CSRD), amends Directive (EU) 2014/95 of October 22, 2014. To this end, it requires companies within its scope to report their non-financial information in line with standardised requirements.
- Organic Law 14/2022 of 22 December, on the transposition of European directives and other provisions for adapting criminal legislation to EU law, and reforming offences related to moral integrity, public order, and the smuggling of dual-use weapons, came into force on 12 January 2023. This law amends the Criminal Code, including the addition of a new paragraph to Article 311, which criminalises the imposition of illegal working conditions by hiring workers under non-employment contract arrangements or maintaining such conditions despite administrative requirements or sanctions. As a result of this law, DRAGADOS has updated its Catalogue of Prohibited Conduct and expected behavioural parameters accordingly.
- Law 2/2023 of 20 February on the protection of whistleblowers, which implements the EU Directive on the protection of individuals who report regulatory and anti-corruption violations. In this regard, the aforementioned Law, in its Second Transitional Provision, set deadlines for adaptation based on the size of each organisation. Section 4.4.13 outlines the detailed adaptation of the Ethics Channel to these regulations.
- Organic Law 3/2023, of 28 March, which amends Organic Law 10/1995, of 23 November, of the Penal Code, on animal abuse, came into effect on 18 April 2023. This law extends the catalogue of offences for which legal entities can be held liable to include offences related to animal abuse. Consequently, the DRAGADOS Catalogue of Prohibited Conduct and Expected Behaviour Parameters has been updated accordingly.
- Organic Law 4/2023, of 27 April, for the modification of Organic Law 10/1995, of 23 November, of the Criminal Code, in crimes against sexual freedom, the Criminal Procedure Law and Organic Law 5/2000, of 12 January, regulating the criminal responsibility of minors. As a result of the aforementioned Law, the Catalogue of Prohibited Conduct and parameters of behaviour expected of DRAGADOS was duly updated.
- The European Sustainability Reporting Standards (ESRS) following Directive 2022/2464 of 14 December 2022 on Corporate Sustainability Reporting (CSRD), published on 9 June 2023, which follows the CSRD proposal and encompasses environmental, social and governance issues, including cross-cutting thematic standards.
- The Draft EU Corporate Sustainability Due Diligence Directive (CSDD Directive) published in February 2022 and last preliminarily approved on 14 December 2023, pending final approval in 2024, introduces obligations for company management on human rights and environmental due diligence. In this sense, DRAGADOS has been monitoring it in order to align itself with it as much as possible before its entry into force, which is not expected before 2025.

Changes in the socio-political environment in 2023:

- Current conflicts, such as the invasion of Ukraine by Russia, the conflict between Israel and Gaza or the situation in the Red Sea, have not only led to great geopolitical instability, but have also brought with them an energy crisis with a major impact on many other economic sectors to be taken into account. In this regard, on 20 February 2023, the ACS International Sanctions Compliance Policy was approved, which is applicable to the Dragados Group.

5. COMPLIANCE MANAGEMENT SYSTEM

Changes in the economic environment in the financial year 2023:

- Russia's invasion of Ukraine: in the same sense as the previous paragraph, this war has had global economic consequences that have enhanced several of the effects of the Covid-19 pandemic. In this sense, the prices of energy products, foodstuffs and raw materials have risen, deteriorating the productive system and threatening growth and social stability.

Variations in terms of social or cultural uses in the financial year 2023:

- These are not considered relevant changes.

In terms of internal factors:

Structural changes in the financial year 2023:

- These are not considered relevant changes.

Variations on the activity of the Organisation:

- These are not considered relevant changes.

Variations in geographical areas:

- These are not considered relevant changes.

5.12. GOVERNANCE AND COMPLIANCE

An effective compliance management system is a fundamental pillar of the good governance of an organisation as Dragados.

Pursuant to the provisions of the Law, the Board of Directors is responsible for determining the Company's general policies and strategies, and supervising the internal information and control systems, including the Compliance Management System, insofar as it is the mechanism for controlling compliance risks.

Likewise, and as established in the ISO 37301 standard to which our parent company ACS is certified, the Board of Directors is required to lead the creation of a culture of compliance, to develop the necessary sensitivity with respect to aspects related to governance and compliance, to defend the organisation's values and, in particular, to promote compliant conduct. In this regard, ISO 37301 requires the Board of Directors to demonstrate an active, visible, consistent, and sustained commitment to a com-

mon standard of behaviour and conduct that is required throughout the organisation, and to this end identifies concrete measures, such as ensuring that the necessary resources are in place for compliance management, supporting the relevant roles to demonstrate leadership in their respective areas of responsibility or ensuring that they are informed in a timely manner of compliance issues, including non-compliance cases, and that appropriate action is taken.

The implementation of all of the above will not only entail compliance with the obligations and principles voluntarily taken on through the internal regulations and, in particular, through the Code of Conduct, in the Corporate Governance Policy and in the General Compliance Policy, but will also entail exercising the duty of care required by commercial law and complying with the best governance standards required by responsible management of the organisations.

5. COMPLIANCE MANAGEMENT SYSTEM

5.13. CONTROL AND MONITORING MEASURES

Established communication and complaints channels

Communication and/or whistleblowing channels are presented as tools that allow organisations to channel communications, as well as queries or complaints related to suspected irregularities, which are often only known to certain employees of the same organisation or to outsiders. In this way, these channels enable organisations, as the entity closest to the reported events, to be aware of them, investigate them and respond early.

The Dragados Group is aware of this reality and of the importance of providing the appropriate tools to the members of its environment for the communication of any infringement in a safe and trustworthy environment for informants.

The Dragados Group's Ethics Channel is aligned with Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, also known as the Whistleblower Protection Act, which transposes Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law. In the context of the Dragados Group's compliance culture, an ever-present objective is to remain aligned with best practices in each area. Therefore, the regulation of the Dragados Group's Ethical Channel is also aligned with the international standard ISO 37002:2021 on Irregularities Management Systems, as are most of the companies in the Dragados Group, based on the principles of trust, impartiality and broader protection than the aforementioned legal texts, bringing the practices of the Dragados Group closer to the highest expectations of society in general, and of its stakeholders in particular.

In this regard, the Dragados Group's Ethical Channel, in addition to being reflected in the Dragados Group's Code of Conduct- in relation to non-compliance with the values and their communication - has specific internal regulations that regulate it: (I) Operating Policy of the Dragados Group's Ethical Channel and (II) Procedure for the Management of Communications Received in the Dragados Group's Ethical Channel, the latest versions of both documents were approved by the Board of Directors on 25 September 2023.

With regard to the management of the Channel, the DRAGADOS Compliance Committee is appointed by the Board of Directors as Head of the Internal Information System, and the DRAGADOS Compliance Director is the natural person appointed as representative before the Independent Authority for the Protection of Whistleblowers.

The Dragados Group encourages all members of its organisation or subjects who suspect or know of infringements related to DRAGADOS to use this or other internal communication channels to inform the Dragados Group of their concerns.

Furthermore, the Dragados Group informs any potential informant at all times that it also has external channels for reporting to the competent authorities and, where appropriate, to the institutions, bodies or agencies of the European Union, citing, for this purpose, access information in its own Ethics Channel Operating Policy.

As established in the Operating Policy of the Ethics Channel, Dragados Group urges any third party that maintains links with the companies of the Group- regardless of the legal nature of their relationship- and any persons who, although not employees, become aware of the existence of any infringement in their professional relationship with Dragados Group to report it to the Organisation.

The Procedure for the Management of Communications Received in the Dragados Group's Ethics Channel develops the content of the Dragados Group's Ethics Channel Operating Policy, ratifying its firm will to maintain a conduct that respects both the rules and the ethical standards of the Dragados Group, establishing the necessary mechanisms to carry out the internal processing of the communications received. In this regard, the Dragados Group considers that the plurality of internal channels enabled broadens the list of possible communications due to subject matter or seriousness, and that it is necessary to classify them internally for their most appropriate management, taking into consideration parameters of (I) urgency; (II) persons involved or (III) the entity affected. These criteria help to identify and deal appropriately with the type of complaints received, as set out in greater detail in the Dragados Group's Procedure for managing communications received.

With regard to its processing, the Dragados Group is aligned with the international standard ISO 37002:2021, dividing the procedure for managing and investigating the communications received into four (4) phases: (I) Reception of complaints and irregularities; (II) Assessment of complaints of irregularities (triage); (III) Handling of complaints and irregularities; and (IV) Conclusion of cases.

All phases of the investigation procedure in the Dragados Group shall comply with the following principles and guarantees: (I) Principle of trust and confidentiality; (II) Principle of objectivity; (III) Principle of impartiality and presumption of innocence; (IV) Principle of compliance with applicable law and sufficiency of means; (V) Principle of

5. COMPLIANCE MANAGEMENT SYSTEM

proportionality and subsidiarity; and (VI) Protection of the bona fide informant.

The Dragados Group's Ethics Channel allows complaints to be made anonymously. Through the Ethics Channel's digital platform, the whistleblower can stay in contact with the organisation while preserving his or her identity and keeping track of his or her file. Likewise, the Dragados Group allows the informant to designate a preferred means of communication to receive information on the status of his or her communication or to contact the informant to request additional information and/or clarification. Both in the presentation of anonymous and nominative reports, the Dragados Group guarantees confidentiality and the absence of reprisals and/or prejudicial conduct against the informant, offering the necessary protection and support from the moment the report is filed when appropriate.

The Dragados Group has an external technology provider, NAVEX, for the reception of the complaints received. Through this provider, a preliminary analysis is carried out to prevent conflicts of interest in the event that a member of the Compliance Committee is involved. Likewise, all communications received can be traced and monitored for their appropriate treatment in their management and custody.

The Dragados Group processes personal data for the processing and investigation of the complaint made through the Ethics Channel in accordance with current legislation. Informants may exercise their data protection rights by contacting us at Avenida del Camino de Santiago, 50, 28050 Madrid (Madrid), Spain or by email at LOPD@dragados.com. More detailed information on the processing of your data is available in the data protection section of the website, as well as directly in the user information of our Ethics Channel.

Access to the Dragados Group's Ethical Channel:

- Through the Group's website-Dragados. Criminal and anti-bribery compliance management- in a separate, easily identifiable section, accessible to all members of the Dragados Group, as well as to all the Group's interlocutors and stakeholders.
- By post sent to:

Dragados Group Ethics Channel

Avda. del Camino de Santiago 50, 28050 Madrid, Spain

- Via the corporate website <https://www.dragados.com/htmlEN/compliance.html> or directly through the link to the Ethicspoint platform operated by Navex Global: <https://secure.ethicspoint.eu/domain/media/eseu/gui/108739/index.html>
- By means of a 24-hours a day, 7-days a week telephone helpline, with the following numbers:

Country		Telephone number
Spain		900 876 043
United States of America	Dragados USA, Inc	866-280-6816
	Schiavone Construction Co LLC/Prince Contracting LLC/J.F. White Contracting Co, Inc	866-777-6115
	John P. Picone, Inc	877-452-3540
	Pulice Construction, Inc	877-452-3541
Argentina		0800-345-1362
Canada		844-985-2427
Chile		800914073
Peru		80078578
Poland		800 005 063
United Kingdom and Northern Ireland		0800 048 5534

- Verbal and/or face-to-face communication:

Likewise, members of the Dragados Group are able to submit queries, concerns or complaints by the following means: (I) Direct line manager or the relevant Director; (II) Member of the Compliance Body; and (III) the Compliance Directorate/Compliance Officer. It shall also be possible for the Reporting Person to request a face-to-face meeting with the Compliance Committee, or any of its members, within seven (7) days of the request for the meeting.

QUERIES AND REPORTS RECEIVED IN 2023

In 2023, Dragados Group received 29 communications: 21% of the communications related to labour issues, 3% of the communications related to insider information, 52% to sexual harassment, 10% to contractual and billing issues, and 14% of the communications related to other aspects.

None of the communications received had a significant impact on the year.

5. COMPLIANCE MANAGEMENT SYSTEM

5.14. COMPLIANCE RISK MANAGEMENT

Section 4.2 of this chapter sets out the model of dual control of compliance risk and the specification of the parent company's duties of diligence with respect to the subsidiaries, which translates into the implementation and development of a homogeneous system of standards through the Group Policies, the objective of which is that all subsidiaries have a certified Compliance management system or, at least, one that can be understood as certifiable. This first control is complemented by the second, half-yearly monitoring to detect those cases in which non-compliances or infringements have been reported or the materialisation or realisation of compliance risks has been verified, also monitoring whether the subsidiary has reacted adequately in that specific case by detecting the deficiencies in the system, taking corrective actions and the steps taken to resolve them (internal investigations and their results, modification of rules, improvement of controls, etc.).

During the 2023 financial year, planned actions have been developed for the operation and strengthening of the Dragados Group's Compliance Management System and the consequent reduction of compliance risks, as part of the objectives set in this area.

The main actions aimed at achieving this objective have focused on the assessment of new criminal risks and the updating of the matrix of criminal and anti-bribery risks and controls, as well as the implementation of this parametrised control tool in all Dragados Group companies; specialised training given to all members of the organisation, including the full Board of Directors; adaptation of the Global Compliance Report questionnaire to the LO 2/2023 regarding communication channels and whistleblower protection; half-yearly monitoring of Compliance risk materialisations through the information reported by all Dragados Group subsidiaries and branches in the Global Compliance Report; and remediation plans.

In line with the above, the management of compliance risks in the Dragados Group during 2023 could be distinguished by the constant detection and work on opportunities for continuous improvement, with the aim of continuing to foster a robust environment in the area of Compliance, uniform in all Dragados Group subsidiaries and branches. In this context, the coordinated action of all Dragados Group companies in Spain for the certification of the UNE 19603:2023 Standard for Compliance Management Systems in the area of Free Competition, within the 2024 financial year, is particularly noteworthy.



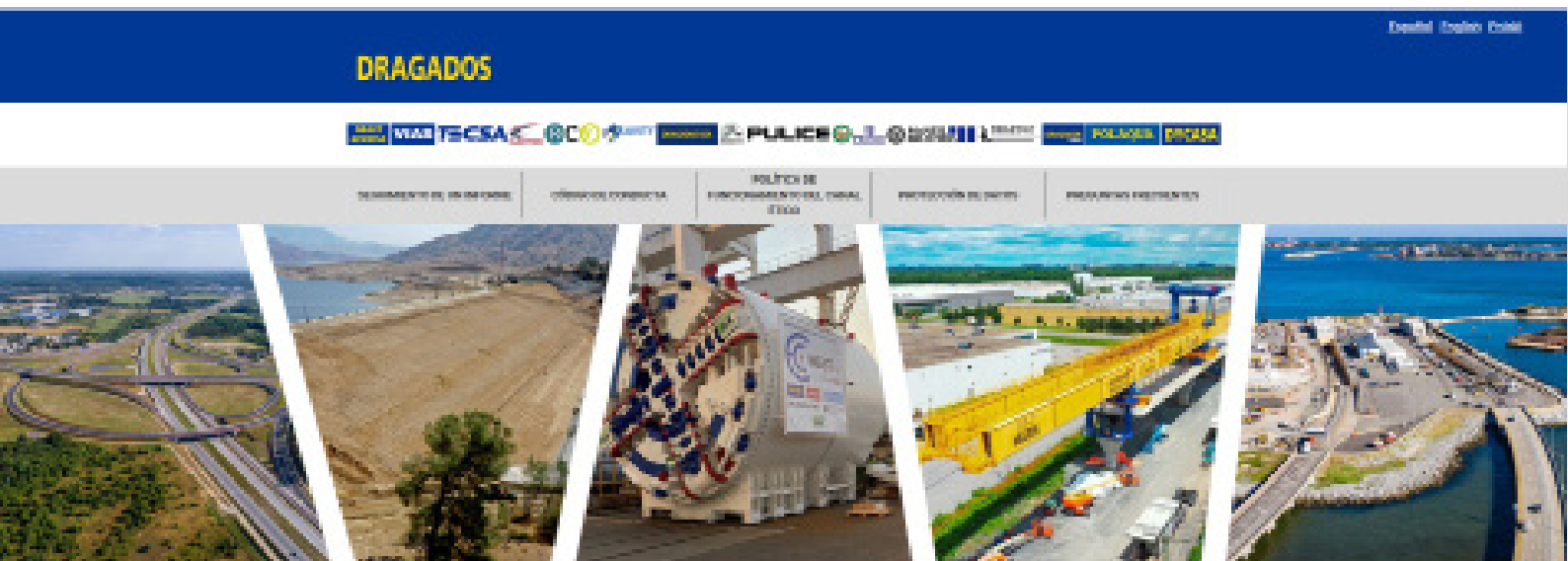
5. COMPLIANCE MANAGEMENT SYSTEM

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To Make a Report

Select the country in which you are located.

- Select -

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to check your report for feedback or questions.

Our Commitment

At Dragados, S.A. and its group of companies (the Dragados Group) we position ourselves as one of the leading players in all the sectors in which we operate, committing ourselves to the economic and social progress of the countries where we are present. We have maintained throughout our history a business commitment to the different stakeholders, based on ethical principles that form part of our corporate culture and which go beyond strict compliance to the law.

Our Code of Conduct embodies the Dragados Group's core values. Therefore, all the Group's companies and divisions must make decisions and adopt behaviours that are in line with this framework. However, since we operate under different jurisdictions, local rules that are stricter will prevail over the provisions of the Code of Conduct. Nevertheless, we will not apply any local customs that may violate our Code of Conduct.

The Dragados Group's work is based on the following values: Integrity, Excellence, Trust, Sustainability, and Profitability. These ensure that a shared value is created for all its stakeholders, along with sustainable and profitable growth for its shareholders. Our conduct always goes hand in hand with our values, as we firmly believe in the benefits for the Dragados Group and for society as well. It will be carried out in such a way that complying with our values naturally becomes part of our culture.

All Dragados Group employees who know or have reasonable suspicions about a breach of the Code of Conduct must report the breach through the channels provided, including jointly notifying their superior. Doing so shows that the employees adhere to our values and are committed to them.

The Dragados Group also makes it easy to report breaches, as it is accessible, not only through the regular channels, but also through alternative methods. Examples of alternative methods include the platform provided by EthicsPoint, an external provider, and reporting the breach by telephone. If you would rather submit an anonymous and confidential report, we encourage you to use the whistleblower channel. We also encourage you to submit any information related to possible breaches of our Code of Conduct, and to seek guidance on our policies and procedures.

Upon request, EthicsPoint will make sure that the information you share remains confidential and anonymous. We can assure you that your comments will be taken into account.

6. SUSTAINABLE PROCUREMENT

6. SUSTAINABLE PROCUREMENT

Management of the supply chain is fundamental for Dragados Group. The Group's commitment to its suppliers and subcontractors is key to ensuring a sustainable model in which product quality comes hand in hand with high performance standards on the part of suppliers and promotion of sustainable practices.

Dragados Group's model of relations with suppliers, subcontractors, and business partners seeks to ensure that projects are carried out in a responsible and ethical manner. Therefore, the integration of Environmental, social, and corporate governance (ESG) aspects in the management of its supply chain is part of Dragados Group's responsibility and commitment to sustainable development.

The Board of Directors of the ACS Group approved the Code of Conduct for Business Partners, last updated on 27 February 2023, which outlines the basic principles that must govern the relationship between the Business Partners and the ACS Group and their companies.

Similarly, in 2021, the Dragados Group approved the Code of Conduct for Business Partners, updated in its latest version from 21 March 2023, based on that of ACS, but adapted it to our particularities.

This code of conduct is based on the ethical principles which permanently guide the behaviour of the Dragados Group. The Dragados Group demands express acceptance of the contents of both Codes from all its business partners (by signing and committing to comply with it). Only in

those cases in which the business partners provide proof of the existence of a Code of Conduct or other internal rules with contents similar to those required by Dragados Group, may these partners be exempted from expressly signing this Code. Thus, 79.2% of the suppliers and contractors Dragados Group worked with during the 2023 financial year accepted Dragados Group's Code of Conduct for Business Partners, either by signing it or by a similar procedure.

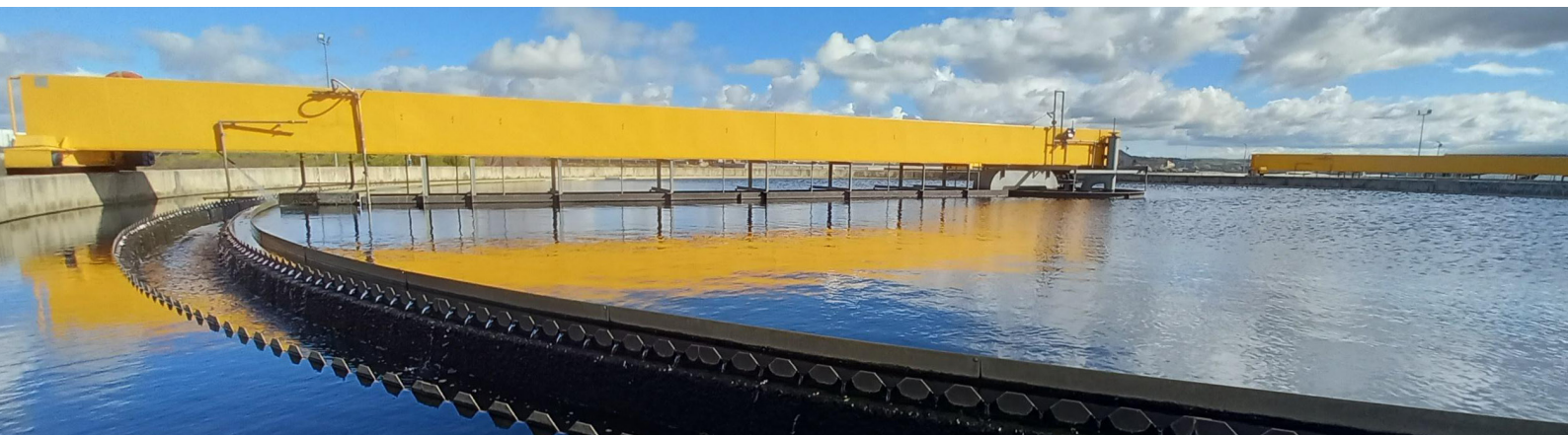
This represents a significant improvement compared to 2022, although work is still being carried out in this department in all Dragados Group companies to further increase this percentage.

In addition, we can highlight that an objective of the 'Commit Governance' department has been included to the 2025 Sustainability Plan, aimed at training at least 75% of suppliers to the Code of Conduct for Business Partners by 2025.

The purchasing departments of Dragados Group companies are responsible for managing relations with suppliers and contractors through specific systems for their management, classification, approval and risk control. As a differentiating characteristic of the Group compared to other competitors, it is worth highlighting that in this domain our purchasing departments and supplier management are highly decentralised. This characteristic gives Dragados Group's companies a competitive advantage, due to the agility, flexibility, and autonomy provided by this model.

	2022 (1)	2023 (1)
% Suppliers and subcontractors who have accepted the DRAGADOS Group Business Partner Code of Conduct	71.9%	79.2%

(1) Includes data reported by Industrial Services assets relating to suppliers and subcontractors.



6. SUSTAINABLE PROCUREMENT

6.1. DRAGADOS GROUP'S SUPPLY CHAIN

	2022 (1)	2023 (1)
No. of suppliers and subcontractors	20,372	22,292
% local suppliers	93.8%	93.4%
% Spending on local suppliers	88.2%	93.5%

(1) Includes data reported by Industrial Services assets relating to suppliers and subcontractors.

The diversity of the Group's activities leads to a highly complex supply chain, involving a wide range of business partners. In this regard, the total number of suppliers that make up the Group's supply chain reached 22,292 in 2023.

Dragados Group is committed to the economic and social progress of the countries in which it operates and, therefore, it is committed to contracting local suppliers. In 2023, 93.4% of suppliers were local, representing 93.5% of total expenditures. Dragados Group's determination to promote local development impacts several areas positively:

- Local economies are boosted while operating costs are reduced.
- Supplier proximity ensures that supplies are available to multiple business units around the world and shortens delivery times.

- Reduction of the Dragados Group's environmental footprint and minimise the impact on the environment.

In managing the Dragados Group's supply chain, the following common management and control processes are defined across all Group companies:

- Specific standards and a system for managing, classifying, approving, and controlling the risks associated with suppliers and subcontractors.
- Analysis of the level of compliance with these systems.
- Promotion of collaboration with suppliers and transparency in contractual relationships.



6. SUSTAINABLE PROCUREMENT

6.2. SYSTEMS FOR THE APPROVAL AND EVALUATION OF SUPPLIERS ACCORDING TO ECONOMIC AND SUSTAINABILITY CRITERIA

	2022 (1)	2023 (1)
% Companies that have a formal supplier approval system in place	93.5%	93.7%
% Companies identifying significant suppliers	94.5%	87.4%
No. of significant direct suppliers	492	539
No. of significant direct suppliers assessed in terms of sustainability	143	173

(1) Includes data reported by Industrial Services assets relating to suppliers and subcontractors.

Dragados Group's responsible supply chain management model begins with a certification process for suppliers and subcontractors in which they are evaluated for compliance with the fundamental criteria established by Dragados Group to become part of the supply chain of the group. Within these criteria, not only are the economic and technical aspects of suppliers evaluated, but also various sustainability factors. This allows for the assessment of suppliers' progress in sustainability, ensuring alignment with the Dragados Group's objectives and principles, while also identifying potential risks within the value chain.

Thus, companies representing 93.7% of the Group's supply expenditures have a formal system for the approval of suppliers and subcontractors.

The weight of ESG factors in the approval process varies according to the companies' activities and action areas, but the weighted average weight of these factors exceeds 32.6% in 2023. The specific aspects evaluated, among others, include the environmental certifications (ISO14001, EMAS or similar), quality certifications (ISO 9001 and similar), commitment to international standards on human rights and labour rights, and analysis of the labour standards and practices of suppliers and subcontractors. In 2023, 30.3% of the suppliers engaged by the Group adhered to ethical, social, and environmental commitment standards or held relevant certifications in these areas.

In the event that non-compliances or risks are detected, appropriate corrective measures are applied based on the circumstances of each case. In most cases, suppliers are given the opportunity to address and rectify these deficiencies within a specified timeframe. Failure to reach the required minimum standards may lead to exclusion from

the recruitment system. When the non-compliances detected are considered serious, they may lead to immediate termination of the contracts.

In 2021, a new supplier approval questionnaire was approved including criteria specifically related to ESG. The main aspects considered during the certification process are as follows:

- Equality and workplace harassment
- Code of conduct
- Human rights
- Carbon footprint
- Use of recycled materials

This new questionnaire has been implemented in the group's companies in Spain and will continue to be implemented in the rest of the group's companies throughout 2024.

Of the suppliers worked with in 2023, 7,690 were evaluated for sustainability at least once in the last three years. This represents 34.5% of total suppliers. The Dragados Group's 2025 Sustainability Plan includes a specific objective to increase this percentage by 2025.

Sustainability integration remains good overall, although with room for improvement in quality and environmental certifications, the use of recycled material and the optimisation of natural resources.

6. SUSTAINABLE PROCUREMENT

6.3. ANALYSIS OF CRITICAL SUPPLIERS

Dragados Group companies develop an analysis to identify significant suppliers in their supply chains. The Group defines a significant supplier as one that either represents a substantially higher percentage of procurement or subcontracting expenditure compared to the average of the company's other suppliers, provides critical or non-substitutable components, or has been identified through a preliminary analysis as potentially posing sustainability-related risks.

The classification of significant suppliers, considering both economic/technical aspects (critical suppliers) and ESG criteria, was established in 2023 and is still being implemented across the different companies of the Dragados Group.

Thus, companies representing 87.4% of the Group's turnover have defined processes to identify critical suppliers in technical/economic terms. While in companies representing 32.0% of the Group's procurement expenditure, pre-analysis processes have been defined to identify suppliers that may have potential sustainability risks. In order to determine ESG significant suppliers, a preliminary analysis is carried out on those suppliers that are identified as potentially high risk due to:

- Country-specific risk: risk of negative environmental, social and governance impacts related to a country's political, social, economic, environmental or regulatory situation.
- Sector-specific risk: risk of negative environmental, social and governance impacts related to the distinctive characteristics of a sector in terms of employment status, energy consumption, resource intensity, emissions or pollution potential.
- Commodity/commodity-specific risk: risk of negative environmental, social and governance impacts related to a commodity's supply chain structure, labour situation, land use and resource intensity, energy consumption, emissions, material toxicity or pollution potential.

Within these suppliers, those that may have substantial risks of impacts on some of these aspects are identified:

- Environmental aspects: the risk of negative impacts related to environmental issues, including but not limited to greenhouse gas emissions, energy consumption, water consumption, resource efficiency, pollution, waste or biodiversity.

- Social aspects: risk of negative impacts related to social issues, including but not limited to human rights and labour rights, such as child labour, forced labour, discrimination, freedom of association, the right to collective bargaining, working hours, remuneration, occupational health and safety, or the rights of local communities.
- Governance aspects: the risk of negative impacts related to governance issues, including but not limited to corruption, bribery, conflicts of interest or anti-competitive practices.

As a result of these processes, the main data on the analysis of significant suppliers (critical in technical/economic terms plus ESG significant) are as follows:

- Of the total number of suppliers of the Dragados Group, 539 are suppliers considered critical in technical/economic terms. These suppliers represent 37.8% of the total expenditure of the Group companies that have critical suppliers.
- Of the total number of significant ESG suppliers, 102 suppliers have been identified in this first year of analysis, representing 5.1% of total expenditure.

All critical and significant ESG suppliers together make up the so-called 'Significant Suppliers'.

Given the importance of analysing the supply chain for risk management for the company, Dragados Group companies identify their significant direct suppliers (significant tier-1 suppliers). The Group has assessed 173 significant tier-1 suppliers in terms of sustainability during 2023 out of the 641 significant tier-1 suppliers identified (27.0%).

In addition, a total of 5 suppliers have been identified as high risk in terms of sustainability, understood as the lack of certifications, non-compliance or other risks detected.

During the year 2024, work will continue on training the different Purchasing Departments of the group's companies in the supplier and subcontractor approval process.

In addition, the scope of this analysis of the Group's supply chain has begun to be extended in Group companies to include critical suppliers of direct suppliers (critical tier-2 suppliers), as well as those tier-2 suppliers that may have potential ESG risks. The number of these suppliers identified in 2023 reached 476 technically/economically critical and 4 ESG significant suppliers.

6. SUSTAINABLE PROCUREMENT

6.4. SUPPLY CHAIN RISK MANAGEMENT

Dragados Group companies develop policies related to supply chain risk management.

For this purpose, each company applies the necessary measures, taking into consideration the results of the risk map and the analyses carried out by the ACS Group, in which risks are prioritised according to their relevance and the impact they may have on the company's activity.

Likewise, in accordance with the risk map drawn up by the ACS Group, the risks have been prioritised according to the relevance they may have for the development of the company's activity, in accordance with the type of activity, areas of action, policies and management approaches, and the results obtained from this prioritisation of potential risks for the development of the activity related to the supply chain are shown throughout the report, as well as the management measures adopted by the ACS Group.

In the management of the supply chain, it is necessary to consider the possible bad practices of suppliers, as they

may pose a risk of undermining their ability to do business. We need to assess the counterparty risks to which we are exposed in terms of staff, health and safety, environment, ethics, integrity and rights, and engage to continuously improve our performances.

To this end, the Code of Conduct for Business Partners establishes the basic principles of conduct which partners must comply with in their relationship with the Group. Likewise, in addition to the management systems set up by the companies regarding their relations with suppliers, the Group's specific regulations on issues such as the Environmental Policy or the Corporate Due Diligence Protocol on Human Rights or the Criminal and Anti-Bribery Compliance Policy extend not only to the Group's employees but also to the entire value chain.

The associated risks of the supply chain issues and the opportunities and measures for their appropriate management are listed below in order of relevance based on the internal and external report:

ISSUE	RISKS	DETECTION, PREVENTION, MANAGEMENT AND MITIGATION MEASURES	ASSOCIATED MANAGEMENT INDICATORS
Responsible management of the supply chain	Responsible supplier and contractor management systems enable the mitigation of potential risks associated with the supply chain, improving processes and working conditions, and creating opportunities and durable trusting relationships. Otherwise, failure to implement a responsible management system may result in significant legal and operational risks for the Group Risks: • Increase in costs associated with activities. • Loss of market share. • Loss of license to operate.	It is essential to ensure that the Company's suppliers and contractors meet their commitments and expectations through awareness raising through established ethical and environmental principles. This management must be carried out through the dissemination and application of environmental, social and governance (CSG) criteria in business relationships with third parties The Dragados Group therefore has: • Supplier approval and selection systems. • Code of conduct for business partners and application of other internal Group policies and regulations. • Supply chain due diligence (financial and non-financial) • Inclusion of ESG criteria in supply chain management. • ESG clauses to suppliers.	Of the 22,292 suppliers and contractors with which the Dragados Group worked during 2023, 79 % of suppliers accepted by signing or have a procedure similar to the Code of Conduct for Business Partners of the Dragados Group. In the formal supplier approval systems, the weight of the factors related to sustainability (environmental, ethical and social criteria) out of the total factors used for the approval varies according to the companies' activities and areas of activity, but the weighted average weight of these factors exceeded 32.6% in 2023. In 2023, 7,690 suppliers had been assessed at least once in the last three years, representing 34.5% of the total suppliers.

7. COMMITMENT TO QUALITY WITH THE CUSTOMERS

7. COMMITMENT TO QUALITY WITH THE CUSTOMERS

7.1. QUALITY IN OUR ACTIVITY

The Dragados Group, in its commitment to continuous improvement, and being aware of the great technical development of the sector, establishes improvement objectives and has quality management systems.

Quality management in the Dragados Group is decentralised, with each company responsible for managing this aspect. Although each company is granted autonomy for its management in accordance with its operations, they all follow common lines of action. Most of the Dragados Group companies use ISO 9001 certified systems, which means carrying out periodic audits, both internal and external, to verify and comply with it.

Each company in the Dragados Group develops its own quality management system, but they are all based on the following guidelines:

- Establishment of objectives and regular evaluation of their fulfilment.
- Development of actions aimed at improving the services provided and customer satisfaction.

- Development of partnerships with suppliers and sub-contractors with the objective of quality improvement.

KEY MANAGEMENT INDICATORS – QUALITY

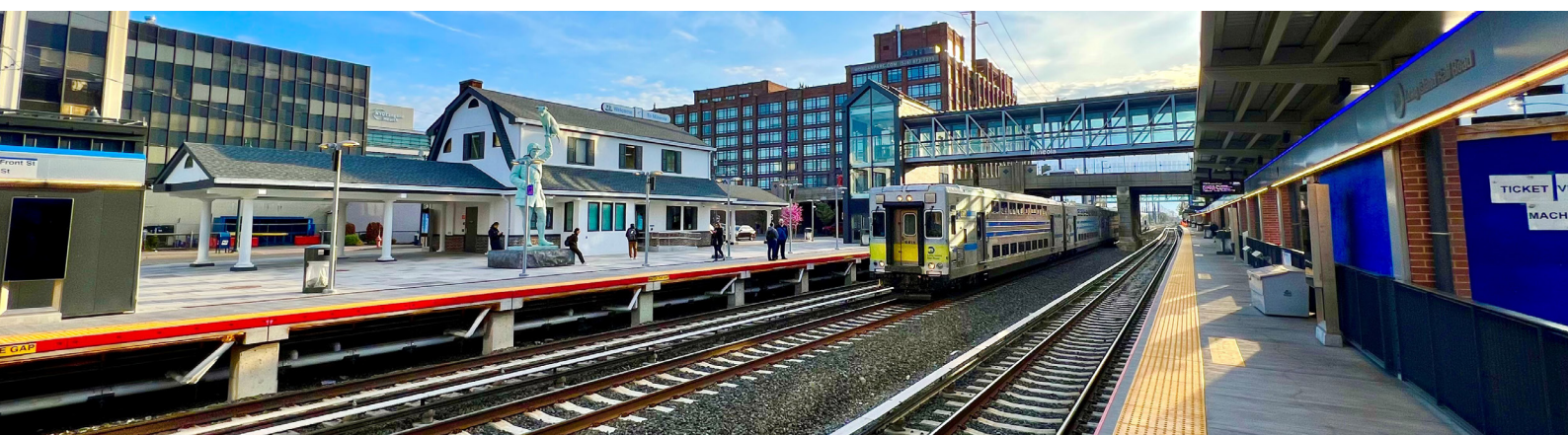
The percentage of ISO 9001 certified production will be 59% in 2023. It is important to include in this data the importance of the Dragados Group's activity in the United States, since this certification (ISO 9001) is not predominant in this region, although the quality management systems applied are in line with the requirements of the aforementioned standard.

The improvement objectives include, in general terms, the following:

- Obtaining and extending the scope of certifications, especially when a new technique is developed or the activity is expanded to a new geographical area.
- Implementing tools for management improvement.
- Improving specific performance indicators.
- Improving the training of workers.

	2022 (1)	2023 (1)
Production certified under ISO 9001	62.1%	59.0%
Number of quality audits per million euros in turnover	0.10	0.09

(1) Includes data reported by Industrial Services assets relating to quality.



7. COMMITMENT TO QUALITY WITH THE CUSTOMERS

7.2. CUSTOMER RELATIONSHIP

The Dragados Group companies are aware of the importance of relationships, trust and the level of customer satisfaction.

For this reason, continuous contact is maintained with clients through the project managers.

Our customer relationship strategy relies on the following core principles:

- Excellence in service and problem-solving approach.

- Active communication with the client, in order to understand and fulfil their expectations.
- Transparency of information on Dragados Group capabilities.
- Identification of future collaboration needs and opportunities.

7.3. CLIENT SATISFACTION

Another key factor within Dragados Group's client relationship management is to measure satisfaction and to establish plans for improvement. As a result, companies representing 81% of the Group's sales have a defined client satisfaction measurement system in place.

Similarly, companies representing 86% of the Group's sales have established specific channels and processes for clients to file complaints and claims.

In this respect, we must consider that the company's business is not focused on end customers, but rather on business with other businesses or with the public sector, which is why the management of these systems is mainly carried out through personalised monitoring systems.

	2022	2023 (1)
Number of client satisfaction surveys received	101	113
Percentage of responses from "satisfied" or "very satisfied" clients out of the total surveys RECEIVED (%)	89.1%	96.5%

(1) Data reported by Industrial Services assets relating to quality are included.



8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS



8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS GROUP DRAGADOS

In an increasingly competitive and demanding context, the Dragados Group is aware of the importance of anticipating future trends and demands to maintain global leadership. The Group therefore promotes innovation and research aimed at finding solutions to improve processes, incorporate technological advances and improve the quality of the services provided.

The company's commitment to innovation can be seen through the significant investments in Research, Development and Innovation that it does year after year. This effort is reflected, among other things, by improvements in productivity, quality, customer satisfaction, safety at work, the use of new materials and products, and the design of more efficient production processes or systems.

Management of innovation at Dragados Group companies normally has the following characteristics:

- The role is assumed by the R&D Departments of the Group's companies in coordination with Dragados. There is a Research, Development and Innovation Committee made up of the company's senior management upon whom the Research, Development and Innovation strategy depends
- R&D is managed through recognised management systems, customarily the UNE 166002.
- Compliance with reference standards is reviewed through independent audits.

Compliance with the requirements of this system involves the development of strategic lines of research, collaboration with external organisations, and investment that aims

to encourage innovation and the regular production of new knowledge and operating techniques.

Collaboration with technological centres, research centres, and universities, as well as other institutions related to research, development, and innovation, strengthen and complement the capacities of the Dragados Group to successfully complete innovation processes. In this sense, the growing number of Research, Development, and Innovation project activities linked to sustainability stand out as proof of the company's commitment to this matter.

During 2023, the Dragados Group had 37 ongoing Research, Development, and Innovation projects, 24 of which had sustainability-related activities.

The projects developed by the Research, Development, and Innovation Departments of the Group are focused on solving specific challenges and opportunities arising in the current construction sector, which is one of the fundamental value-creation activities. Thus, the main lines of Research, Development, and Innovation activities linked to sustainability are related to:

- Renewable energies.
- Emission reductions and climate neutrality.
- Circular economy and efficiency in the use of resources and materials.
- Infrastructure resilience.
- Water management.
- Prevention, health and safety.

8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS

EXAMPLES OF ACTIVITIES AND PROJECTS

TRA 2024 CONFERENCE: TRANSPORT RESEARCH ARENA 2024 (DRAGADOS)

Dragados, as vice-president of the European Technology Platform for Sustainable Construction and the Built Environment (ECTP), is also a member of the Steering Committee for TRA 2024, the largest European conference on transport research. This conference is held every two years and is organised by the European Commission, CEDR (the Conference of European Road Directors), and various European technology platforms related to infrastructure and transport. Each year, it is hosted by a different EU member state, with Ireland selected as the host for 2024. The conference was held in Dublin from April 14-18, 2024, under the theme "Transport Transitions: Advancing Sustainable and Inclusive Mobility," and saw the participation of over 4,000 delegates.

As part of the conference programme and aligned with the conference theme, Dragados and CEDR organised Strategy Session 3.1: "The Resilient Transport Network: Improving and sustaining Europe's infrastructure to cope with decarbonisation and climate change".

This session focused on the challenge of enhancing resilience within the transport system amidst evolving dynamics. It explored the use and planning of current and future European transport infrastructure in response to factors such as automation, electrification, and hydrogen adoption, with a focus on decarbonisation and the impact of climate change. The session delved into the convergence of transport, energy, and digital infrastructure networks, addressing challenges related to technology development and deployment, alternative fuels infrastructure, and the regulatory impact on decarbonisation and resilience. The session highlighted the main bottlenecks in the transport system and presented both strategic and operational perspectives to address these issues. High-level representatives from the European Union and Member States, transport operators, academia, and the construction sector shared their perspectives, offering a comprehensive

overview of how resilience is evolving in the context of decarbonisation and climate change adaptation. Attendees gained crucial insights into current initiatives, policy contributions, stakeholder perspectives, and financial mechanisms that are driving the transition to climate-neutral transport infrastructure.

A panel of distinguished experts participated in the session. In the picture below, from right to left, are Jan Slager, Director of Rehabilitation and Renovation at Rijkswaterstaat (Netherlands); Herald Ruitjers, Director of DG MOVE Directorate B at the European Commission; and Prof. Athena Roumboutsos, University of the Aegean (Greece); Tim Reardon, Managing Director, PWC (Australia) (former Secretary for Transport, New South Wales, Australia), Richard Bradley, Director of Sustainable Construction, CRH (Ireland); Prof. Alan O'Connor, Head of School of Engineering, Trinity College Dublin (Ireland); Dr. Miguel Segarra, Head of R&D and Innovation Department, Dragados (Spain).



CLIMPORT PROJECT: CLIMATE-RESILIENT PORT INFRASTRUCTURE DESIGN AND CONSTRUCTION MODELLING SYSTEM (DRAGADOS)

The R&D project "CLIMPORT: System for Modelling the Design and Construction of Port Infrastructure Adapted to Climate Change" was approved under the 2022 Public-Private Collaboration Projects call, within the thematic priority of Climate, Energy, and Mobility. This initiative has received co-funding from the Ministry of Science and Innovation through the State Programme to Promote Scientific and Technical Research and Its Transfer, part

of the State Plan for Scientific and Technical Research and Innovation 2021-2023. This funding is part of the broader Recovery, Transformation, and Resilience Plan.

The project is scheduled for implementation from 2023 to 2026. The consortium comprises Dragados, various industrial partners, and the Institute of Environmental Hydraulics (IH CANTABRIA) as the research centre.

8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS

The project aligns with climate change adaptation strategies and the Recovery, Transformation, and Resilience Plan, reflecting European initiatives in this area. Consequently, this solution will have a significant impact on the design and construction of port infrastructure, advancing maritime engineering and construction practices. Moreover, its modular design makes it easily adaptable to various types of marine infrastructures, including offshore energy projects, thereby broadening its applicability.

The project's main objective is to create an innovative modular system with new methodologies for designing and constructing port infrastructures adapted to climate change. This system will integrate databases and advanced mathematical, numerical, and statistical design tools, alongside international regulations, recommendations, methodologies, and reference manuals. It will also align with cutting-edge construction procedures, emphasising standardisation, normalisation, and process traceability.

By developing this system, the project aims to achieve more effective port design, enhance construction efficiency and safety, and deliver a more reliable and resilient infrastructure in the medium to long term. This tool will account for the effects of climate change on ports, leading to more efficient, sustainable, and safer maritime transport. It will contribute to the ecological

transition goals set by both the Spanish Government and the EU for the short to medium term.

A comprehensive system for port design and construction will be developed that integrates explicit risk analysis, addressing both climate change impacts and construction-related risks.

The solution will enable the direct integration of all relevant variables for port design and construction across various levels of hierarchy, automatically linking their physical and spatial-temporal effects. The integrated approach of examining various phases of a port's life cycle—encompassing design and construction—across different time scales (such as historical data, forecasts, and long-term climate trends), and across multiple spatial scales (from global to local and detailed levels) is considered groundbreaking globally.

Additionally, the project will create a digital twin of the port's hydraulic behaviour for various stages of its life cycle.

Finally, the project will assess the port's renewable energy potential by characterising wind and wave energy resources. This will involve studying how these dynamics behave within the ports, aiming to enhance and support emission neutrality by integrating renewable energy sources into port operations.

DIGITUN PROJECT: DIGITAL FIRE SAFETY FOR ROBUST UNDERGROUND CRITICAL TRANSPORT INFRASTRUCTURE (DRAGADOS)

The R&D Project "DIGITUN: Digitalised Fire Safety for Resilient Underground Critical Transport Infrastructures" was approved under the 2022 Public-Private Collaboration Projects call within the thematic priority of Digital World, Industry, Space, and Defence. It has been co-funded by the Ministry of Science and Innovation through the State Programme to Promote Scientific and Technical Research and its Transfer, as part of the State Plan for Scientific and Technical Research and Innovation 2021-2023, within the framework of the Recovery, Transformation, and Resilience Plan. The project, running from 2023 to 2026 and coordinated by DRAGADOS, involves collaboration with partners including UPC Cantabria.

The project's main objective is to digitalise fire safety management in tunnels by employing low-cost wireless sensors and advanced structural reliability models. This approach aims to enhance the assessment of tunnel structures following a fire and to optimise repair or demolition strategies, focusing on both environmental and economic sustainability.

Considering the substantial concrete consumption involved in tunnel construction and repair, along with the conventional methods of data management typically used in such projects, the optimisation enabled by new technologies can lead to significant sustainability benefits. Even modest reductions in the use of non-renewable materials (like cement, steel, and aggregates), as well as reductions in CO2 emissions and energy consumption through process optimisation via digitalisation, can result in substantial environmental improvements.

The wireless sensors deployed in this project will be capable of recording the high temperatures reached within fibre-reinforced concrete elements, including precast segments and shotcrete supports, during actual fire conditions. These sensors will provide data to a non-linear finite element heat transfer model, which will be developed, calibrated, and validated throughout the project. This model will enable the generation of time-temperature profiles along the concrete lining of the tunnel during a fire.

8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS

This model will facilitate the creation of a methodology for structural repair or reinforcement following a fire. It will also enable the optimised design of tunnel linings, using calibrated and validated constitutive equations derived from the heat transfer model, along with a new cross-sectional numerical model for post-fire structural assessment.

An advanced digital platform will be developed and validated to record, correlate, analyse, and visualise real-time data from the wireless sensors. This platform will support decision-making related to repair or reinforcement operations,

enabling the evaluation and quantification of the sustainability (economic, environmental, and social) of the digitised concrete linings.

The project's results will also enhance the optimisation of critical operations in the dowel production process, including demoulding and steam curing. This improvement will lead to better productivity and quality control during manufacturing, helping to prevent damage from cracking during curing, storage, and transportation due to harsh environmental conditions.

SUSTAINABLE CONSTRUCTION: HYDROGEN FUEL CELL TECHNOLOGY (DRAGADOS UK)

In a world where environmental concerns are paramount, the construction industry faces growing pressure to embrace sustainable practices. Dragados, as part of the MDJV joint venture, has made strides towards the decarbonisation of the Euston High Speed 2 station in London by incorporating green hydrogen-based energy into the construction process. This move marks a significant advancement in the pursuit of sustainable construction practices.

The innovative approach involved using a hydrogen fuel cell provided by AFC Energy to power a zero-emission Electric Telescopic Handler.

The hydrogen fuel cell works by catalysing the reaction between hydrogen and oxygen atoms within an electrochemical cell, generating electricity while producing only water and heat as by-products.

Charging electric construction machinery with emission-free solutions at the point of use marks a significant step forward in the decarbonisation of construction activities at Euston station, particularly in areas where traditional energy supplies are less accessible.

Using electricity generated by the hydrogen fuel cell to power daily construction machinery highlights the importance of prioritising decarbonisation in the construction industry and encourages employees to develop innovative solutions.



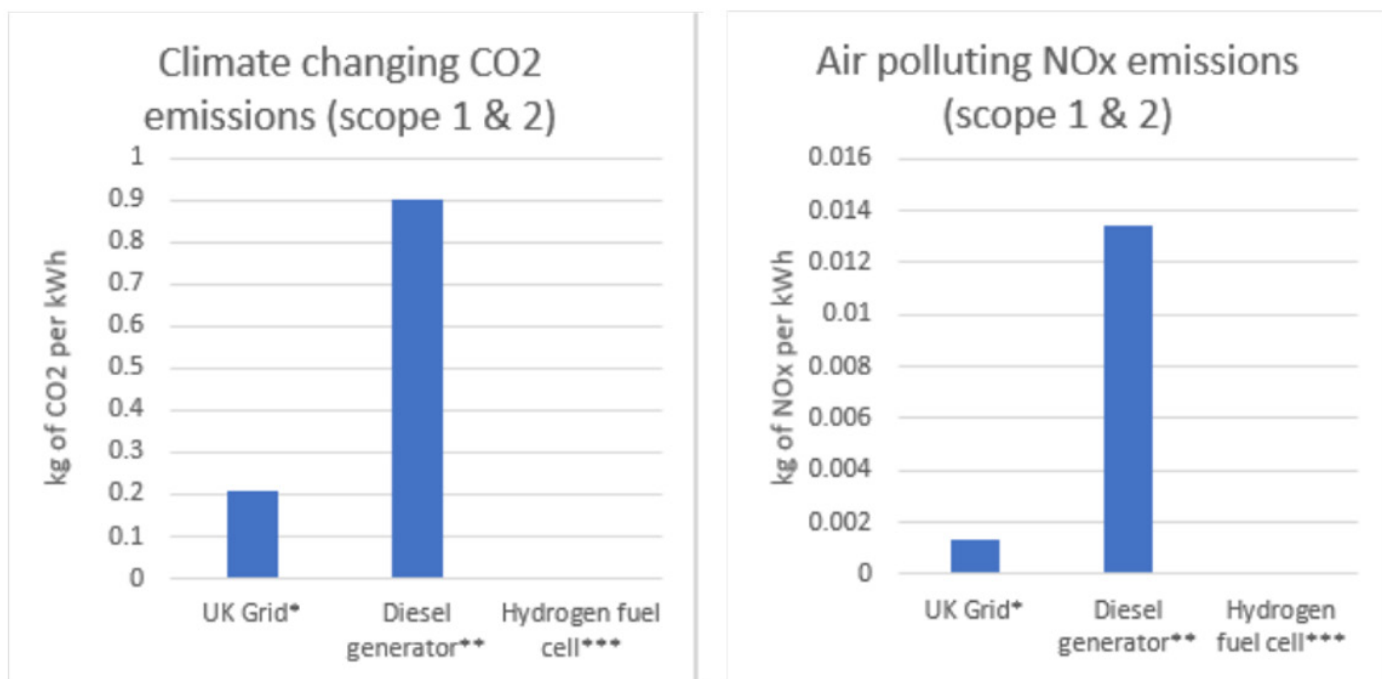
Sustainable Pathway: Minimising Environmental Impact

The gradual integration of systems like hydrogen fuel cells into our operations is crucial for achieving our goal of diesel-free construction processes by 2029.

The innovative 'H-Power' fuel cell tower is pivotal in charging the electric telehandler on-site, providing a fully emission-free solution that minimises the need for main power capacity and generates nearly no noise. Additionally, it has been utilised to power lighting and a site water pump, showcasing its versatility, particularly in areas with limited access to main power sources for recharging.

The image below illustrates a comparison of CO₂ and NO_x emissions among the UK grid, a diesel generator, and the hydrogen fuel cell.

8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS



* UK Government Greenhouse Gas Conversion Factors for 2021 Company Reports

** Typical 10 kW Diesel Generator (FG Wilson Generator Set) Using an Average Biofuel Blend

*** Green hydrogen is assumed

The adoption of this innovative technology underscores the commitment of High Speed 2, the MDJV joint venture, and Dragados to embrace cutting-edge innovations and low-carbon energy solutions. This effort aims to achieve zero emissions at Euston Station and sets a benchmark for other High Speed 2 projects to prioritise sustainability in their operations.

Lessons Learned

During the test phase, valuable insights were gained on the application of the fuel cell technology in the construction of the new Euston high-speed station. These insights

have served as a benchmark for other High Speed 2 construction projects aiming to adopt sustainable practices.

In summary, the integration of hydrogen energy at Euston station marks a major milestone in the shift towards sustainable building practices. Through innovation and collaboration, Dragados, the MDJV joint venture, and AFC Energy have showcased the feasibility and critical importance of operating without emissions, paving the way for a more sustainable future.

Thus, Dragados, as part of the MDJV joint venture, is showcasing its dedication to advancing High Speed 2's vision for a low-carbon future in the UK.

REZBUILD PROJECT: ENERGY REHABILITATION OF BUILDINGS USING INNOVATIVE SOLUTIONS (VIAS)

Digitisation of construction and prefabrication are essential tools in the energy renovation of buildings. In this context, VIAS has participated in the REZBUILD project under the European Horizon 2020 programme, showcasing its commitment to introducing innovative solutions that add significant value in the fight against climate change and differentiate the company within the sector.

The project has developed a range of cutting-edge technologies designed to achieve Nearly Zero Energy Buildings (NZEB), including integrated photovoltaic modules (BIPV), innovative gypsum-based insulation products, solar-assisted heat pumps, and advanced energy management systems (BEMS). Simultaneously, a methodology has been developed to select and integrate the most effective technologies and systems for each renovation project. This process involves a cyclical iterative approach of modelling,

8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS

simulation, and decision-making during the design phase, supported by a collaborative platform based on Building Information Modelling (BIM).

The results from the project have been successfully implemented and validated at three pilot sites across Europe. Specifically, VIAS has led and executed the energy refurbishment of a single-family home in Madrid. The selected property did not have an efficient heating system and had an associated fuel poverty problem (indoor comfort before the intervention was very low). In addition, the building was under special protection, as it belonged to a Historic Site, which greatly conditioned the type of intervention on the building envelope, making the demonstrator's work very difficult. In this regard, it is worth highlighting the limitations imposed on the design of the photovoltaic solution: the surface of the roof to be covered, the location of the modules and the requirement for perfect aesthetic integration, opting for a solution of photovoltaic modules with a colour similar to that of the roof tiles.

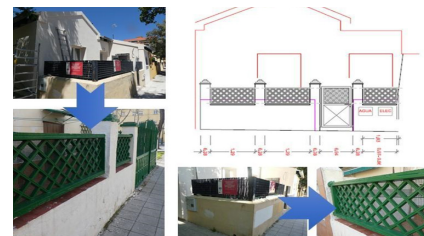
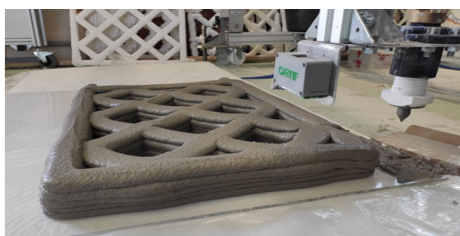
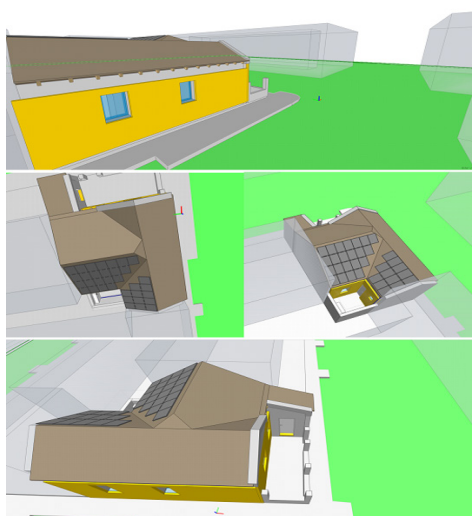
In a first phase of analysis, the methodology developed in the project was applied. Climatic and technical conditions, user needs, property requirements as well as local regulatory restrictions were analysed at an early stage. A multi-criteria analysis of alternatives was carried out and decision support tools were used (including, among other analyses, the use of energy simulation software or the application of the cost-efficiency method). In line with the initial needs and requirements, this phase ended with the selection of the best possible combination of renovation solutions for the Madrid demonstrator, complementing the technologies developed in the project (multilayer insu-

lation of the envelope, deployment of energy monitoring and management systems, lightweight glass-silicon glass photovoltaic modules installed on the roof and, additionally, the demonstrative application of 3D printing technology) with other innovative commercial technologies (new polycrystalline silicon glass-glass photovoltaic modules installed on the roof and, additionally, the demonstrative application of 3D printing technology), polycrystalline silicon glass-glass lightweight photovoltaic modules installed on the roof and, additionally, the demonstrative application of 3D printing technology) with other innovative commercial technologies (new efficient and sustainable air-conditioning system, window renovation, replacement of lighting fixtures, and a new efficient and sustainable air-conditioning system).

The design of the refurbishment was carried out using BIM methodology, with the model being revised and updated throughout the execution phases and after completion.

Using the installed instrumentation, the energy consumption before and after the renovation was measured to determine the amount of energy saved, to assess the effectiveness of the renovation and to evaluate, under real operating and climatic conditions, the performance of the combination of solutions and new technologies introduced. Additionally, environmental and indoor air quality parameters, such as temperature, humidity, and CO₂ levels, were monitored.

The results confirmed a significant reduction in energy consumption, while also improving indoor air quality.



8. RESEARCH, DEVELOPMENT AND INNOVATION AT DRAGADOS

INNOVATION PROJECTS TO ENHANCE TIMBER BUILDING CONSTRUCTION PROCESSES (VIAS)

Given the increasing emphasis on sustainability and environmental stewardship in the construction industry, selecting eco-friendly materials has become a top priority. In this context, wood is emerging as a highly valuable material for advancing sustainable construction. Its versatility, durability, and environmental benefits make it a significant contributor to the sector's decarbonisation efforts.

However, only 2% of the houses built in Spain use wood, despite its superior ecological, sustainability, and social impact parameters compared to other materials. Wood also offers added benefits in terms of habitability and resonates positively with users and society.

In recent years, VIAS has specialised in constructing various types of timber buildings and has undertaken several innovative projects focused on enhancing and automating assembly processes.

In this context, notable projects include the Optimisation of Construction Methods for Large Timber Buildings, undertaken at IES Serra de Noet Secondary School in Berga, Barcelona, focused on refining construction techniques for

large-scale wooden structures; the industrialised Timber Housing Solutions, initiative advanced the design of large prefabricated wooden modules for residential use, which were successfully implemented in constructing 85 social housing units in Cornellá; the Gabriel García Márquez Library in Barcelona, explored innovative construction solutions, including the creation of expansive wooden spans to incorporate skylights in central areas of the library.

In all cases the developments have been based on digital models made in BIM.

Specifically, the Gabriel García Márquez Library has been chosen as the **World's Best Public Library in 2023** by the International Federation of Library Associations and Institutions (IFLA) and has received the EU-Mies van der Rohe Youth Award. In addition to using PEFC wood (wood from sustainably managed and forest-certified forests), it is LEÉIS Gold certified as a sustainable building. The building is part of a new production and consumption model where resources and materials are permanently recycled and waste is minimised to the maximum, thus extending the life cycle.



ANNEX

CONTRIBUTION TO THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT GOALS

SCOPE OF THE DATA

ANNEX: CONTRIBUTION TO COMPLIANCE WITH SUSTAINABLE DEVELOPMENT GOALS

Through the development of its activity focused on the development of infrastructure, the Dragados Group works to achieve the commitments of the 2030 Agenda on sustainable development. In this sense, the Group measures its performance in contributing to the Sustainable Development Goals (SDGs) that are most interrelated with its activity. This contribution is further enhanced by its size and international presence.

Following approval of the new 2025 Sustainability Plan, the Dragados Group has determined that it contributes substantially to the achievement of 6 Sustainable Development Goals linked to the Group's activity through commitments established and strategic lines.



GOAL 8: PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH, FULL AND PRODUCTIVE EMPLOYMENT AND DECENT WORK FOR ALL

SPECIFIC GOALS TO WHICH THE DRAGADOS GROUP CONTRIBUTES

- 8.2 Achieving higher levels of economic productivity through diversification, technological upgrading, and innovation.
- 8.4 Progressively improving global resource efficiency in production and consumption by 2030 and aiming to decouple economic growth from environmental degradation.
- 8.5 Achieving full, productive, and decent employment and equal pay for all.
- 8.6 Reducing the proportion of young people who are unemployed and not in educational programmes.
- 8.8 Protecting labour rights and promoting a safe and secure working environment for all workers.

CONTRIBUTION OF THE DRAGADOS GROUP

As a global company, the Dragados Group participates in the development of key sectors for the world economy and provides work for a large number of people. Furthermore, the Group understands the important role that having local roots and being sensitive to the unique features of each site plays in the company's success. The Group companies are committed to remaining in the majority of the regions where they operate, actively contributing to the economic and social development of these environments, contracting a high percentage of local suppliers and workers.

The Group is committed to the professional development of its employees and is a strong advocate of internationally recognised human and labour rights. The company also encourages, respects, and protects the freedom to participate in trade unions and the right of association of its workers. Likewise, occupational health and safety is a priority objective for the ACS Group in the development of all the Group's activities.

ASSOCIATED 2025 SUSTAINABILITY PLAN COMMITMENTS

- Prioritising occupational health and safety of employees and contractors
- Driving economic and social development at the service of the local community
- Being a benchmark group in the development of specialised and diverse talent

MANAGEMENT AND MONITORING INDICATORS

- Number of employees: 8,934
- % local employees: 98.71%
- % of local suppliers: 93.4%
- Number of hours of training per year: 217,379
- % employees covered by management and occupational safety systems: 100%



GOAL 9: BUILDING RESILIENT INFRASTRUCTURE, PROMOTING INCLUSIVE AND SUSTAINABLE INDUSTRIALISATION AND FOSTERING INNOVATION

SPECIFIC GOALS TO WHICH THE DRAGADOS GROUP CONTRIBUTES

- 9.1 Developing reliable, sustainable, resilient, and quality infrastructure to support economic development and human well-being.
- 9.4 Upgrading infrastructure and converting industries to make them sustainable, using resources more efficiently, and promoting the adoption of clean and environmentally sound technologies and industrial processes.
- 9.a Facilitating the development of sustainable and resilient infrastructure in developing countries through increased financial, technological, and technical

CONTRIBUTION OF THE DRAGADOS GROUP

Through its infrastructure and industrial development activity, the Dragados Group makes a decisive contribution to the economic progress of societies and the well-being of people. The Dragados Group is also firmly committed to being a benchmark in sustainable infrastructure.

The Group supports investment in R&D, using resources more efficiently and promoting the adoption of sustainable technologies and industrial processes.

ASSOCIATED 2025 SUSTAINABILITY PLAN COMMITMENTS

- Being a benchmark in sustainable infrastructure

MANAGEMENT AND MONITORING INDICATORS

- Sales in projects with sustainable certifications: €1,129,000,000
- R&D investment: €5.35 million



GOAL 10: REDUCE INEQUALITY WITHIN AND AMONG COUNTRIES

SPECIFIC GOALS TO WHICH THE DRAGADOS GROUP CONTRIBUTES

10.2 Promoting the social, economic, and political inclusion of all persons.

10.3 Ensuring equal opportunities and reducing inequality of outcomes.

CONTRIBUTION OF THE DRAGADOS GROUP

Through its infrastructure construction activities in undeveloped countries, the Dragados Group contributes to the reduction of inequalities between countries by generating a favourable economic and social environment for their development.

ASSOCIATED 2025 SUSTAINABILITY PLAN COMMITMENTS

- Being a benchmark group in the development of specialised and diverse talent
- Driving economic and social development at the service of the local community

MANAGEMENT AND MONITORING INDICATORS

- % local employees: 98.71%
- % of local suppliers: 93.4%



GOAL 11: MAKING CITIES AND HUMAN SETTLEMENTS INCLUSIVE, SAFE, RESILIENT AND SUSTAINABLE

SPECIFIC GOALS TO WHICH THE DRAGADOS GROUP CONTRIBUTES

11.2 Providing access to safe, affordable, accessible, and sustainable transport systems for all, and improving road safety.

11.3 Increasing inclusive and sustainable urbanisation by 2030.

CONTRIBUTION OF THE DRAGADOS GROUP

Through its various activities, the Dragados Group provides services that help create more efficient and sustainable cities. These include sustainable building, the construction of public transportation systems, traffic management services, etc.

In addition, the Group contributes to R&D projects for the development of more efficient and resilient materials and more sustainable cities.

ASSOCIATED 2025 SUSTAINABILITY MASTER PLAN COMMITMENTS

- Being a benchmark in sustainable infrastructure

MANAGEMENT AND MONITORING INDICATORS

- Sales in projects with sustainable certifications: €1,129,000,000
- R&D projects related to sustainability: 24



GOAL 12: ENSURING SUSTAINABLE CONSUMPTION AND PRODUCTION PATTERNS

SPECIFIC GOALS TO WHICH THE DRAGADOS GROUP CONTRIBUTES

12.2 Achieving sustainable management and efficient use of natural resources between now and 2030.

12.5 Significantly reducing waste generation by 2030 through prevention, reduction, recycling, and reuse.

CONTRIBUTION OF THE DRAGADOS GROUP

The Dragados Group promotes responsible management of its entire supply chain and implements measures for the efficient use of natural resources in all its projects. From the design phase to execution, the use of sustainable materials is encouraged, water and energy consumption is rationalised, and waste is properly managed, promoting its prevention and minimisation with the aim of maintaining a percentage of waste destined for reuse and recycling at 80%.

On the other hand, the Dragados Group promotes the evaluation of its suppliers in terms of sustainability, with the objective of reaching 100% of its suppliers evaluated by 2025.

ASSOCIATED 2025 SUSTAINABILITY PLAN COMMITMENTS

- Integrating circularity in our activities.
- Ensuring responsible supply chain management in line with commitments and performance standards.

MANAGEMENT AND MONITORING INDICATORS

- % of waste destined for reuse and recycling: 87.7%
- % suppliers assessed in the last 3 years in terms of sustainability: 34.5%



GOAL 13: TAKING URGENT ACTION TO COMBAT CLIMATE CHANGE AND ITS EFFECTS

SPECIFIC GOALS TO WHICH THE DRAGADOS GROUP CONTRIBUTES

- 13.1 Strengthening resilience to climate-related risks.
- 13.3 Improving awareness of climate change mitigation and adaptation.

CONTRIBUTION OF THE DRAGADOS GROUP

The Dragados Group strives to contribute to the transition to a low-carbon economy by including measures to adapt to and mitigate climate change in its activities, as well as identifying opportunities for the promotion of environmentally-friendly products and services that minimise its impact. As such, the Dragados Group is committed to anticipating its climate neutrality by 2045, as well as improving the measurement of its footprint and reducing it in the short and medium term.

ASSOCIATED 2025 SUSTAINABILITY PLAN COMMITMENTS

- Anticipating climate neutrality by 2045
- Sustainability in the governance model

MANAGEMENT AND MONITORING INDICATORS

- Change in Scope 1 emissions (vs 2019): -4.61%
- Variation in Scope 2 emissions (vs 2019): -24%
- Renewable energy as a percentage of total: 21.4%

ANNEX: SCOPE OF THE DATA

ENVIRONMENT

% of turnover	2022	2023
Certifications		
Implementation of ISO 14001 certification	100.00%	100.00%
Implementation of other environmental certifications	100.00%	100.00%
Projects registered and certified as efficient construction	100.00%	100.00%
Emissions		
Petrol (million litres)	100.00%	100.00%
Diesel (million litres)	100.00%	100.00%
LPG (million litres)	100.00%	100.00%
Natural Gas (kWh)	100.00%	100.00%
Biofuel (million litres)	100.00%	100.00%
Electricity (MWh)	100.00%	100.00%
Electricity from renewable sources (MWh)	100.00%	100.00%
Scope 1 emissions	100.00%	100.00%
Scope 2 emissions	100.00%	100.00%
Scope 3 emissions	100.00%	100.00%
Amount of significant atmospheric emissions, in kg of NOx	90.28%	96.80%
Amount of significant atmospheric emissions, in kg of SOx	90.28%	96.80%
Amount of significant atmospheric emissions, in kg of VOCs	90.28%	96.80%
Waste		
Hazardous waste (t)	100.00%	100.00%
Non-hazardous waste (t)	100.00%	100.00%
Water resources		
Water withdrawal (m ³)	100.00%	100.00%
Water withdrawal in water stress areas (m ³)	100.00%	100.00%
Water discharge (m ³)	100.00%	100.00%
Water discharge in water stress areas (m ³)	100.00%	100.00%
Biodiversity		
Surface area of the projects located in areas of high value for biodiversity	90.28%	96.80%
Surface area restored during the year (Hectares)	90.28%	96.80%

Materials (% of turnover)	2022	2023
Total wood purchased (m3)	100.00%	100.00%
Percentage of certified wood	100.00%	100.00%
Total steel purchased (t)	100.00%	100.00%
Percentage of recycled steel	100.00%	100.00%
Total concrete purchased (m3)	100.00%	100.00%
Percentage of cement/concrete with recycled aggregate	100.00%	100.00%
Total glass purchased (m2)	100.00%	100.00%
Percentage of recycled glass	100.00%	100.00%

PEOPLE

% of employees	2021	2022	2023
Total employees	90.31%	94.51%	94.68%
Local employees	90.31%	94.51%	94.68%
Of the employees reported, number of women with a management position (construction/project manager or similar and higher)	90.31%	94.51%	94.68%
Work-family life balance measures	90.31%	94.51%	94.68%
Percentage of men/women who return to work after paternity/maternity leave	90.31%	94.51%	94.68%
Employees affiliated with trade union organisations	90.31%	94.51%	94.68%
Employees covered by collective bargaining agreements or by an independent trade union	90.31%	94.51%	94.68%
Employees trained	90.31%	94.51%	94.68%
Total teaching hours given	90.31%	94.51%	94.68%
Breakdown of hours by professional category	90.31%	94.51%	94.68%

HEALTH AND SAFETY

% of turnover	2020	2021	2022	2023
Investment in health and safety (millions of euros)	98.30%	98.30%	98.39%	100.00%
Employees who have received health and safety training during the year (%)	98.30%	98.30%	98.39%	100.00%
Employees who have received health and safety training during their career with the company (%)	98.30%	98.30%	98.39%	100.00%
Percentage of total employees covered by OSHAS 18001 and ISO45001	98.30%	98.30%	98.39%	100.00%
Frequency rate. Company staff	98.30%	98.30%	98.39%	100.00%
Severity rate. Company staff	98.30%	98.30%	98.39%	100.00%
Incidence rate. Company staff	98.30%	98.30%	98.39%	100.00%
Frequency rate. Subcontractors	98.30%	98.30%	98.39%	100.00%
Total number of cases of occupational diseases (employees)	98.30%	98.30%	98.39%	100.00%
Total number of cases of occupational diseases (contractors)	98.30%	98.30%	98.39%	100.00%

REGULATORY COMPLIANCE

% of employees	2020	2021	2022	2023
Number of communications received and handled by the Ethics Channel	100.00%	100.00%	100.00%	100.00%
Scope of the training plans regarding the company's Human Rights, Ethics, Integrity, Conduct, or Compliance Procedures	88.80%	90.31%	94.51%	94.68%
Number of courses given with content covering the company's human rights, ethics, integrity, conduct, or compliance procedures	88.80%	90.31%	94.51%	94.68%
Number of employees trained in Human Rights, Ethics, Integrity, Conduct, or Compliance Procedures during the year	88.80%	90.31%	94.51%	94.68%
Training hours per trained employee	88.80%	90.31%	94.51%	94.68%
Lawsuits for Human Rights violations	100.00%	100.00%	100.00%	100.00%

% of turnover	2020 (*)	2021	2022	2023
Value of contributions to associations (scope % turnover)	95.46%	96.26%	97.64%	100.00%

SUSTAINABLE PROCUREMENT

% of turnover	2022	2023
Number of suppliers	96.71%	96.35%
Signing or acceptance of the Code of Conduct for Business Partners	96.71%	96.35%
Training on the Code of Conduct for Business Partners	96.71%	96.35%
Supplier approval systems	96.71%	96.35%
Weight of non-financial criteria	96.71%	96.35%
Critical suppliers. % of total	96.71%	96.35%
Suppliers screened in terms of sustainability	96.71%	96.35%

QUALITY

% of turnover	2022	2023
Production certified under ISO 9001	100.00%	100.00%
Number of Quality audits	100.00%	100.00%
System for measuring client satisfaction	100.00%	100.00%
Number of client satisfaction surveys received	100.00%	100.00%
Client responses which are "satisfied" or "very satisfied" out of the total number of surveys received (%)	100.00%	100.00%
System for measuring client complaints and claims	100.00%	100.00%
Number of complaints and claims from clients received in the reporting period	100.00%	100.00%
Number of complaints and claims from clients resolved in the reporting period	100.00%	100.00%

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