

SUPPLIERS CODE OF ETHICS

ferrovial

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INTRODUCTION

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

PURPOSE

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

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

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

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

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

SCOPE OF APPLICATION

This Suppliers Code of Ethics applies to all Suppliers of Ferrovial, S.A. and the companies that make up its Group, regardless of their business sector, geographical location or activity.

For the purposes of this Code, "Group" refers to the business group headed by Ferrovial, S.A., which includes all companies that are directly or indirectly controlled by Ferrovial, S.A. Both Ferrovial, S.A. and Group are referred to as "Ferrovial".

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

ETHICAL PRINCIPLES OF CONDUCT

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

1. RESPECT FOR LEGALITY

Compliance with Applicable Laws

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

Fair Competition

The Supplier will avoid any action that may constitute an illegal practice of unfair competition and undertakes to ensure compliance with applicable competition laws.

Anticorruption Laws

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

Rejection of Insider Trading

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

Relations with the Authorities

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

Anti-Money Laundering Laws

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

Accuracy in Books and Records

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

2. ETHICAL INTEGRITY

Integrity

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

Anticorruption Policy

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

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

Professionalism and Transparency

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

The commercial, financial and/or business information provided by the Supplier to Ferrovial will be true, complete and without any intention of deception.

Conflicts of Interest

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

3. RESPECT FOR HUMAN RIGHTS AND ABOLITION OF CHILD LABOR

Respect for Human Rights

The Supplier shall scrupulously respect the human rights and public freedoms contained in the Universal Declaration of Human Rights and the resolutions of the International Labour Organisation, in particular the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

Abolition of Child Labour

The Supplier shall not use child labor or incorporate any product or service from child labour into its business activities and shall ensure compliance with the provisions of the International Labour Organisation (ILO) regarding the work of minors.

4. COMMITMENTS ON LABOR PRACTICES

Health and Safety at Work

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

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

Equal Opportunities

The Supplier shall not discriminate against its employees on the basis of age, sex, physical or mental disability, marital status, race, colour, religion, national origin or genetic information. The Supplier assumes responsibility for maintaining a work environment free from discrimination and harassment.

Rejection of Forced Labour

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

5. COMMERCIAL AND MARKET COMMITMENTS

Quality

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

Confidentiality

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

6. COMMITMENTS TO THE COMMUNITY

The Environment

The Supplier will respect the environment in which it carries out its activities and will minimize the negative effects that these may cause.

The Supplier is committed to strictly complying with applicable environmental legislation and assuming the best environmental practices in all its activities.

Social Commitment

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

ETHICAL CHANNEL The Supplier may report any irregular practices related to non-compliance with or breach of the principles contained in this Suppliers Code of Ethics through the Ethics Line available on the Ferrovial website <https://www.ferrovial.com>.

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