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TITLE: Global Anti-Harassment and  
Anti-Discrimination Policy

VERSION: 2

SCOPE: General

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CANCELS: N/A

DATE OF PUBLICATION OF THE CURRENT  
VERSION: N/A

LANGUAGE OF THE ORIGINAL VERSION: English

APPROVED BY: Chief Executive Officer

ISSUING AREA: Human Resources

## Review history

Version	Date of publication	Reason and summary of changes	Cancel/Replaces
1	09/05/2024	In accordance with the requirements derived from U.S. regulations and listing rules arising from the upcoming listing on the Nasdaq Stock Exchange, a Global Anti-Harassment and Anti-Discrimination Policy is created. The Policy has also been reviewed for alignment with relevant Dutch and Spanish regulations.	N/A
2	16/07/2025	Review of the policy and updated links to the Code of Ethics and the Belonging and Inclusion policy.	N/A

## 1) INTRODUCTION

Ferrovial is committed to developing a working environment which is free from all types of harassment, discrimination, and bullying. We require all our people to promote the highest standard of ethics as well as our values of respect, collaboration, and integrity. This policy reinforces the principles outlined in Ferrovia's [Code of Ethics and Business Conduct](#) and our [Belonging and Inclusion Policy](#).

## 2) OBJECTIVE

The goals of this Policy are to:

- a. Ensure that Company employees are treated with dignity and respect when working at the organization internally and externally at any company-sponsored event.
- b. Maintain and promote a work environment free of all forms of harassment, unlawful discrimination, and bullying where customers, employees, suppliers, business partners, visitors and shareholders are treated with dignity and respect.
- c. Provide due process for the consideration of claims of harassment, unlawful discrimination and bullying for all the individuals concerned.

## 3) SCOPE

It is the policy of Ferrovia SE and all the companies that comprise the Ferrovia Group, whatever their area of business, geographical location, or activities (collectively, the "Company" or "Ferrovia") to maintain a workplace that is free from all forms of unlawful discrimination and harassment and is an environment characterized by respect for one another. Ferrovia Group is the consolidated group of companies headed by Ferrovia SE, and all the entities that it controls, directly or indirectly. "Control" is understood to exist when Ferrovia holds a majority of the voting rights within the management or governing bodies.

This policy (the "Policy") applies to all employees, officers and directors of the Company, as well as interns (whether paid or unpaid). The Company will strive to ensure that contractors and persons conducting business with the Company, apply the principles of this Policy. This Policy may be modified or discontinued by the board of directors of Ferrovia SE at any time, with or without notice.

As a general rule, in the event of any discrepancy between this Policy and the local regulation of a jurisdiction, the stricter rule should be applied. However, in the event of conflict between this Policy and the local regulation, previous consultation is required with the Human

Resources Department of Ferrovial SE. In any case, approval by the Human Resources Department of Ferrovial SE will be required prior to the passing of any internal rule or procedure on this matter.

#### 4) WORKPLACE HARASSMENT, DISCRIMINATION AND BULLYING

It is the Company's policy that all employees be able to enjoy a work environment that is free from all forms of harassment and unlawful discrimination. In order to promote compliance with this Policy, the Company has provided a definition of the kinds of conduct prohibited by applicable laws and regulations pertaining to unlawful discrimination, harassment, and bullying.

##### a. HARASSMENT

Harassment refers to a broad range of unacceptable and unwelcomed actions and behaviors that can reasonably be expected to cause offense, humiliation, or other physical or psychological injury or harm to an individual (International Labor Organization -ILO-, 2022). It includes conduct which has the purpose or effect of undermining the dignity of a person and creating a threatening, hostile, degrading, humiliating or offensive environment, as well as offensive verbal, physical, or visual behavior and actions directed toward an individual, in each case based upon the individual's gender, color, race, ethnicity, religion, national origin, age, disability, pregnancy, sexual orientation, gender identity and expression, covered veteran status or protected genetic information (each, a "Protected Class"), or any other protected class in accordance with applicable laws.

In addition, harassment can range from extreme forms such as violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or jokes based on a co-worker's protected status. Other types of harassment may include the following types of conduct:

- derogatory or insensitive jokes, pranks, or comments.
- slurs or epithets.
- nonverbal behavior such as staring, leering, or gestures.
- ridiculing or demeaning comments.
- innuendos or veiled threats.
- displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are derogatory.

- offensive comments about appearance, or other personal or physical characteristics, such as comments on someone's physical disability or religious attire; or
- unnecessary or unwanted bodily contact such as blocking normal movement, or physically interfering with the work of another individual.

This list of examples is not exhaustive, and there may be other behaviors that constitute unacceptable harassment under this Policy.

Ferrovial will not tolerate any form of harassment within the organization or at any external, work-sponsored event.

## b. SEXUAL HARASSMENT

Sexual harassment is a serious manifestation of sex discrimination and a violation of human rights. Sexual harassment includes any physical, verbal, or non-verbal conduct of a sexual nature and other conduct based on sex affecting the dignity of people, which is unwelcome, unreasonable, and offensive to the recipient, and a person's rejection of, or submission to, such conduct is used explicitly or implicitly as a basis for a decision which affects that person's job; or a conduct that creates an intimidating, hostile or humiliating working environment for the recipient. (ILO, 2022)

Sexual harassment can encompass a range of behaviors and practices of a sexual nature, such as unwanted sexual contact, comments, or advances, "jokes," displaying pictures or posters objectifying people, contact or sexual assault. Sexual harassment may be perpetrated by different individuals, including colleagues, managers, subordinates and third parties. It includes, but is not limited to, conducts such as the following:

- making unwanted sexual advances and requests for sexual favors, including but not limited to when submission to such conduct is made an explicit or implicit term or condition of employment.
- displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are obscene or sexual in nature.
- unwanted comments about appearance, or other personal or physical characteristics, such as sexually charged comments, words, signs, jokes, pranks, intimidation, or physical violence that is of a sexual nature or directed at an individual because of that individual's sex.
- unwanted verbal or physical advances, sexually explicit derogatory statements, or sexually discriminatory remarks made by someone that are

offensive or objectionable to the recipient, that cause the recipient discomfort or humiliation, and/or that interfere with the recipient's job performance.

- unnecessary or unwanted bodily contact such as groping or massaging; or
- threats or demands that a person submit to sexual requests as a condition of continued employment or to avoid some other loss and offers of employment-related benefits in return for sexual favors.

Sexual harassment can happen regardless of the gender, gender identity, orientation or gender expression of the individuals involved, and can, for example, occur between same-sex individuals as well as between opposite-sex individuals. It does not require that the harassment conduct be motivated by sexual desire. In some instances, sexual harassment may not only be a violation of Company policy, but also a form of workplace discrimination that is against the law.

Ferrovial will not tolerate any form of sexual harassment within the organization or at any external, work-sponsored event.

### c. BULLYING

Bullying is a form of psychological harassment consisting in persecutory behavior through vindictive, cruel, or malicious attempts to humiliate or undermine an individual or groups of workers, including unjustified, constant negative remarks or criticism, isolating a person from social contacts, and gossiping or spreading false information. Bullying includes "mobbing," which involves an individual gathering others, willingly or unwillingly, knowingly, or unknowingly, to assist in creating a hostile work environment through actions such as public discrediting, isolating, shunning, sabotage, false accusations and emotional and psychological abuse and humiliation. Bullying may be perpetrated by different individuals, including colleagues, managers, subordinates and third parties. It includes, but is not limited to, conduct such as the following:

- unwanted conduct that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment, even if it does not lead to tangible or economic job consequences.
- shouting at someone, name-calling, ridiculing or making belittling or demeaning comments about someone, whether in private or in front of others.
- using one's authority to threaten someone else.

- undermining someone's work intentionally, maliciously or without justification by: excessively monitoring or criticizing someone's work, adding or removing responsibilities, withholding relevant information, or excluding them from relevant communications or meetings.

Ferrovial will not tolerate any type of direct or indirect verbal or written bullying comments/remarks and/or behaviors within the organization or at any external, work-sponsored event.

#### d. DISCRIMINATION

Discrimination is any distinction, exclusion or preference made on the basis of gender, color, race, ethnicity, religion, national origin, age, disability, pregnancy, sexual orientation, gender identity and expression, covered veteran status or protected genetic information (each, a "Protected Class"), or any other protected class in accordance with applicable laws, which has the effect of nullifying or impairing equality of opportunity and treatment in employment or occupation. The Company will not tolerate discrimination of any kind that violates this protocol.

All employees have an obligation to comply with this Policy and if you observe or become aware of conduct that might violate this Policy, you should immediately report it. Ferroviai may consider conduct to be a violation of this Policy even if it falls short of unlawful discrimination or harassment under applicable law. Moreover, for the avoidance of doubt, any action or actions that could reasonably be considered a violation of international human rights standards, including the UN's Guiding Principles on Business and Human Rights, shall be a violation of this Policy. For more information on how to raise a concern or the reporting procedures please refer to section 5: reporting responsibilities and complaint procedures.

### 5) REPORTING RESPONSIBILITIES AND COMPLAINT PROCEDURES

Every employee and manager at the Company is responsible for ensuring that the Company provides a respectful work environment. As such, managers must proactively assist employees in resolving concerns or conflicts and ensuring that complaints of harassment, discrimination, bullying or other inappropriate behavior are handled properly, promptly and effectively with the guidance of the company's compliance department and the company's legal and human resources department.

All Company employees have the lawful right to work in an environment free from harassment, discrimination, bullying or other inappropriate behavior and/or written or oral comments or remarks. If any employee encounters conduct inconsistent with this Policy, the Company encourages the employee to report the conduct using the internal procedures developed by the Company. Reports of violations or suspected violations of this Policy may be made verbally or in writing. Managers are required to report any complaint they receive,

or any violations of this Policy that they observe, to their manager or using any of the other reporting mechanisms set forth wherein.

The Company encourages, but does not require, individuals who believe they are being treated inappropriately under the terms of this Policy to promptly notify the offender that the behavior is unwelcome. Regardless of whether the individual has confronted the offender, the behavior should be immediately reported to their manager or to the Company's Ethics Channel accessible on Ferrovial's intranet and on Ferrovial's corporate website, at [www.ferrovial.com](http://www.ferrovial.com). All communications sent through the Ethics Channel shall be confidential and, if the sender wishes, may remain anonymous (to the extent feasible and permitted by applicable law). As detailed below, any retaliation for any good faith report is in and of itself a violation of this Policy and senders acting in good faith and related parties, such as co-workers and family members will be protected from retaliation to the fullest extent possible. All communications shall be managed in accordance with the Policy for the Ethics Channel and for dealing with Queries, Complaints and Reports. In addition to the electronic access to the Ethics Channel, parties may also send communications and documents and access their application by mail to P.O. Box 2160 28080 Madrid, SPAIN or access the Ethics Channel through toll-free numbers listed on [www.ferrovial.com](http://www.ferrovial.com).

While investigations will vary from case to case, investigations may include any of the following: (i) a review of the allegations, (ii) consideration of interim corrective measures pending the outcome of the investigation, if appropriate, (iii) a review of relevant documents and phone records (if available), (iv) an interview with all parties and relevant witnesses, and (v) notification to all interested parties of the final determination. If it is determined that a violation of this Policy has occurred, appropriate corrective action will be taken, which may include disciplinary action ranging from a reprimand to termination of employment. All employees, including managers, are required to cooperate with any internal investigation of harassment or discrimination. For the avoidance of doubt, nothing in this Policy is to be interpreted or applied in any way that prohibits, restricts or interferes with an employee's (a) exercise of rights provided under, or participation in, "whistleblower" programs of the U.S. Securities and Exchange Commission or any other applicable regulatory agency or governmental entity (each, a "Government Body"), or (b) good faith reporting of possible violations of applicable law to any Government Body, including cooperating with a Government Body in any governmental investigation regarding possible violations of applicable law.

## 6) CONFIDENTIALITY

Harassment, unlawful discrimination and bullying, or other inappropriate behavior, claims will be promptly investigated and handled with sensitivity. In light of the important privacy interests of all concerned, confidentiality will be maintained throughout the investigatory process to the extent possible.

Ferrovial takes every measure to respect employee confidentiality. The Company will adopt the corrective measures that it deems relevant in relation to any violation of this Policy.

## 7) RETALIATION PROHIBITED

Retaliation against an individual who, in good faith, makes a report of an alleged violation of this Policy, or who assists in providing information relevant to such a report, is itself a serious violation of this Policy. Acts of retaliation include being discharged, disciplined, discriminated against, or otherwise subject to adverse employment action and should be reported immediately. The Company will promptly investigate any retaliation report and take appropriate corrective action up to and including termination. The Company will not tolerate retaliation against anyone who, in good faith, complains or provides information about suspected harassment, or discrimination, bullying or other inappropriate behavior, oral and/or written comments or remarks.

## 8) LEGAL PROTECTIONS AND EXTERNAL REMEDIES

Harassment, bullying and unlawful discrimination are not only prohibited by the Company but are also prohibited by applicable laws. Aside from the internal process noted above, employees may also choose to pursue legal remedies with any Government Body to the extent permitted at any time within the applicable statute of limitations.

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