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1	13/9/2016	New Procedure	N/A
2	30/10/2018	Segregation of agent provision	NPDC 104 (13/9/2016)
3	6/06/2023	Adapt the format to Policy to issue and manage internal regulations (NG.FER.AJ-001), and change of code	NPDC 104 (30/10/2018)
4	9/05/2024	Adaptation to Dutch and US law as consequence of listing in Nasdaq Stock Exchange and Amsterdam Stock Exchange	Previous Version 3 NPDC 104 (6/06/2023)
5	15/10/2025	Update to reflect current practices, including modifications to definitions and addition of Responsibilities Clause	Previous Version (NG.FER.CU-05) 9/05/2024

INDEX

I.	Purpose.....	2
II.	Definitions.....	2
III.	Scope of application.....	3
IV.	Responsibilities	4
V.	Applicable Regulations	4
VI.	Prohibited conduct	5
VII.	Permitted conduct	6
VIII.	Receipt of gifts or Anything of Value by Group employees	6
IX.	Ethics Channel	7
X.	Dissemination and training.....	7
XI.	Disciplinary measures	8
XII.	Validity.....	8

I. PURPOSE

The values of Ferrovial, as reflected in the Code of Ethics and Business Conduct (“**Code of Ethics**”), imply commitment to the highest standards of integrity, transparency, respect for the law and for human rights. Thus, Ferrovial requires its business to be conducted according to such principles and with the utmost respect for any applicable laws, whether national or international.

The Anticorruption Policy of Ferrovial (the “**Policy**”) shall govern the behaviour of all Directors and Employees of Ferrovial and the Group, and their collaborators in the conduct of business, bearing in mind that Ferrovial has implemented a policy for “zero tolerance” for any practice that may be classified as Corruption or the giving or receipt of bribes. The Policy will govern the interactions between Ferrovial and any person, and it shall not be limited to those interactions between Ferrovial and Government Officials.

II. DEFINITIONS

Anything of Value: Among other things, cash or cash equivalents; gifts; meals; entertainment, including tickets for events; travel expenses; donations; favourable loan terms; third-party services; equipment, supplies or amenities; scholarships; marketing or promotional expenses; training courses; offers of employment or other benefit to a Related Party, including a family member. It need not have a tangible or economic value as long as it has value to the recipient.

Applicable Anticorruption Laws: Applicable laws that prohibit bribery or any other form of Corruption. In particular, the Dutch Criminal Code, the Spanish Criminal Code, the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2015 or any other anticorruption legislation that may be applicable.

Board: the board of directors of Ferrovial SE.

Compliance Department: The compliance department of Ferrovial SE.

Corruption: misuse of authority or position of trust for personal benefit, where individuals exploit access to resources, decision-making power, or influence, for improper gain, violating ethical duties of fairness, honesty, and accountability.

Employees: The employees and executives of Ferrovial.

Ethics Channel: A channel for communication with Ferrovial by which Employees, Directors and interested Third Parties can make queries, complaints and reports.

Ferrovial or Group: Means Ferrovial SE, the companies forming part of its consolidated group and, in general, all entities under its direct or indirect control. “Control” shall mean the ability to exercise more than 50% of the voting rights or appoint or remove a majority of the board, except in companies whose statutorily imposed control structures dictate otherwise and who shall not be considered part of the Group for purposes of this Policy.

Government Official: Any official or employee of an administration, department, agency, legislative assembly, judicial body, agency or international public organization; any person who performs a public function or acts in an official capacity for a government or international public organization; or a political party, its employees or its candidates. Companies controlled by a government are

classified as agencies of the same. Some examples of Government Officials are as follows: (i) federal, state, regional and municipal employees; (ii) employees of international public organizations (e.g., the World Bank, United Nations); (iii) candidates for political office; (iv) members of a royal family or employees of a sovereign investment fund; and (v) employees of any company directly or indirectly controlled by a State or one of its agencies.

Participating Entities: entities that Ferrovial neither wholly owns nor controls, but in which Ferrovial owns an interest.

Related Party: Person who has a family relationship up to the second degree of consanguinity or affinity with the Government Official, as well as their spouse or person with an equivalent relationship.

Third Party: A natural or legal person who is not an Employee or Director of Ferrovial or other companies in which Ferrovial has an ownership interest.

III. SCOPE OF APPLICATION

This Policy shall apply to:

- Ferrovial SE and all the companies that comprise the Group, whatever their area of business, geographical location or activities;
- Members of the governing bodies of Ferrovial SE and members of the governing bodies (including supervisory boards or equivalent bodies) of the companies that comprise the Ferrovial Group (“**Directors**”); and
- Employees of any of the companies that comprise the Group.

Ferrovial shall strive to ensure that the principles established in this Policy are widely and regularly communicated to and by all the companies of its Group.

In Participating Entities where this Policy does not apply, Ferrovial will strive to ensure, via the decision-making bodies of the respective companies, the application of the principles included in the Code of Ethics and in all the policies related to the prevention of Corruption and fraud. Ferrovial will also strive to ensure that Third Parties that provide services or otherwise work with it (partners, suppliers, advisors, etc.) apply those principles.

As a general rule, in the event of any discrepancy between this Policy and the local regulations 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 Compliance Department of Ferrovial. In any case, approval by the Compliance Department of Ferrovial will be required prior to the passing of any internal rule or procedure on this matter.

This Policy cannot anticipate all situations or matters. It is the responsibility of all Directors and Employees to request information and guidance when addressing new or unusual situations. In the event of doubt, the Director or Employee should consult the Compliance Department of Ferrovial before acting.

IV. RESPONSIBILITIES

- **First Line (Employees)**
 - o Read, understand and apply this Policy as necessary.
 - o Familiarize themselves with the anticorruption regulations applicable to them and their actions.
 - o Implement (i) adequate internal controls and procedures that help prevent bribes or Corruption and detect illegal transactions and (ii) accounting practices that help to ensure the accuracy of its books and records.
 - o Report any violations of this Policy to their manager or their Human Resources Department, to the Compliance Department or to the Ethics Channel.
- **Second Line (Compliance Department)**
 - o Regularly assesses Compliance risks, including the regular review of those risks with potential criminal consequences for Ferrovial, as required by applicable regulations.
 - o Develops and monitors the implementation of the risk-based Compliance Program, including this Policy.
 - o Provides training and awareness to Employees and to Directors regarding the subject matter of this Policy.
 - o Updates this Policy as necessary to comply with applicable internal and external regulations.
 - o Operates and maintains the Ethics Channel.
- **Third Line (Internal Audit)**
 - o Conducts audits to evaluate the effectiveness of the controls in place and reports findings or recommendations to senior management and the Board.

V. APPLICABLE REGULATIONS

Ferrovial is an international group that operates in different countries and in various geographical zones. Each country may have specific anticorruption regulations. This means that Ferrovial is subject to compliance with various regulations, including:

- The Dutch Criminal Code
- The Spanish Criminal Code
- The U.S. Foreign Corrupt Practices Act
- The U.K. Bribery Act 2015
- The United Nations Convention against Corruption; and
- The OECD Anti-Bribery Convention.

The Policy mandates compliance with Applicable Anticorruption Laws worldwide, including any laws prohibiting the giving or receiving of bribes and Corruption.

Relationship between the Applicable Anticorruption Laws and this Policy:

The Applicable Anticorruption Laws may impose specific requirements that are not included in this Policy; for that reason, it is a requirement of this Policy that each Director and Employee familiarize

themselves with the Applicable Anticorruption Laws applicable to them and their actions. In addition, Ferrovial may have approved specific anticorruption policies for some territories.

VI. PROHIBITED CONDUCT

Any failure to comply with Applicable Anticorruption Laws is a violation of this Policy and, in particular:

- To give, offer, promise, contract or authorize the handing over of Anything of Value, directly or indirectly:
 - (a) to a Government Official, to unlawfully influence an official act or decision;
 - (b) to a corporate person or similar entity in which the Government Official or a Related Party is a shareholder, director, member or holds managerial control or a position of influence therein, to illegally influence an official act or decision of the Government Official;
 - (c) to any person, to induce him/her to unlawfully influence an official act or decision;
 - (d) as a reward for an official act or decision or other action conferring an improper advantage or benefit; or
 - (e) in each of (a), (b) and (c) above, to otherwise obtain, retain or secure an improper advantage or benefit.

An “act” includes an omission to act or a delay in the act that the Government Official should perform, as well as an abuse or misuse of the Government Official’s position.

No actual exchange needs to occur to violate this Policy: an offer or promise is sufficient.

- To solicit, receive or accept Anything of Value that may influence you to make a decision or reward you for a decision taken previously, or to offer, give or authorize the handing over of Anything of Value in order to influence another person to make a decision or reward that person for a decision taken previously.
- To sign false contracts, in violation of this Policy.
- To fail to maintain accurate books and records, to hide or misallocate funds, or to disguise or attempt to disguise the sources of funds.

Ferrovial is required to have in place (i) adequate internal controls and procedures that help prevent bribes or Corruption and detect illegal transactions; and (ii) accounting practices that help to ensure the accuracy of its books and records. Hidden or badly accounted assets and liabilities are therefore prohibited. All payments, expenditures and transactions must be classified adequately pursuant to the applicable accounting regulations, without any hidden payments that conceal the true nature of any arrangement, and they must have the appropriate authorizations as set out in the procedures for payments, expenditures and transactions.

VII. PERMITTED CONDUCT

In general terms, Ferrovial understands that customary gifts or any other legal form of spending or entertainment may be an important part of the relationship with our customers and suppliers. However, it is important to determine the type of gifts and entertainment that may be exchanged with our customers and suppliers, in order to ensure that they do not conceal possible bribes or cases of Corruption.

This Policy does not prohibit expenses that may be considered customary or appropriate within a professional business relationship maintained in good faith, provided that the following criteria are met:

- a) They are given or received (i) on behalf of Ferrovial, and (ii) openly and transparently, not secretly;
- b) They do not include cash or cash equivalents;
- c) They are permissible and not excessive under laws of the jurisdiction in which the business relationship is carried over and any other Applicable Anticorruption Laws or industry standards;
- d) They do not include funding of the costs of leisure activities, travel expenses and similar of companions or guests at company meetings;
- e) They do not include gifts that are not in good taste, or which involve attendance at locations inappropriate for the furtherance of professional relationships;
- f) They are made at an appropriate time; that is, at times when relevant decisions are not being taken with regard to aspects that may have an impact on the relationship of Ferrovial with the Third Party;
- g) They are related to a legitimate business purpose;
- h) Their purpose is not to influence the person for whom they are intended; and
- i) They are accurately and completely recorded in Ferrovial's books and records or the books and record of any companies that comprise the Group.

The person who hands over or makes available the gift or entertainment must ask himself/herself whether such gift or entertainment may compromise the independence, integrity and/or honesty of the recipient when adopting a corporate or business decision and must, in all cases, comply with the current version of the Gifts and Hospitality Policy. In the event of doubt, consult your manager and the Compliance Department of Ferrovial.

Third Parties are prohibited from giving any gifts or providing hospitality for or on behalf of Ferrovial unless it complies with the Applicable Anticorruption Laws, pre-approved in writing by Ferrovial's Compliance Department or contemplated in the relevant contractual arrangement with the Third Party.

VIII. RECEIPT OF GIFTS OR ANYTHING OF VALUE BY GROUP EMPLOYEES

Should any Employee receive a gift or Anything of Value from a customer or supplier, or in general from any Third Party with which Ferrovial has any type of commercial, corporate or business relationship or with which it may come to have such a relationship, the provisions of the Gifts and Hospitality Policy shall apply. In any case, the following criteria shall be taken into account:

Pursuant to this Policy the following are strictly prohibited:

- To accept a gift or Anything of Value when it is known or suspected that its purpose is to influence a decision that the Employee must take or to reward the Employee for a decision taken previously.
- To request any type of gift or Anything of Value from a Third Party.
- To accept gifts or Anything of Value during periods in which relevant decisions need to be taken with regard to the person who offers the gift or Anything of Value.
- Acceptance of cash or cash equivalents is prohibited in all cases.

Directors and Employees of Ferrovial may accept gifts or Anything of Value from Third Parties under the following circumstances:

- The gift must have the following characteristics: (i) it is reasonable with regard to the amount and frequency, (ii) it is given at an appropriate time, (iii) the reason for which it is offered is appropriate, and (iv) it is not known or suspected that the Third Party hopes to obtain an advantage in exchange for it in the commercial or professional relationship.
- Acceptance of the gift or Anything of Value must be permitted pursuant to the laws of the jurisdiction in which the business relationship occurs and any other Applicable Anticorruption Laws in force at the time.
- The gift or Anything of Value may in no case consist of cash or a cash equivalent.

In any case, the person who receives the gift or Anything of Value must ask himself/herself whether such gift or Anything of Value may compromise his/her independence, integrity and/or honesty when adopting a corporate or business decision, paying special attention to these considerations during negotiation processes and after the signing of an agreement. In the event of doubt, any person in a position to receive a gift or Anything of Value should consult their manager and the Compliance Department of Ferrovial.

IX. ETHICS CHANNEL

If you know or reasonably suspect that there has been a violation of this Policy you should promptly alert your manager, the Compliance Department of Ferrovial, or communicate your concern via the Ethics Channel or any other similar communication channel that may be available. Further information on the treatment of communications made via the Ethics Channel may be found in the Policy of the Ethics Channel and for Dealing with Queries, Complaints and Reports, which is available on the intranet and on Ferrovial's website www.ferrovial.com.

All communications sent through the Ethics Channel shall be confidential and the sender may remain anonymous (to the extent feasible and permitted by applicable law). Ferrovial has zero tolerance for retaliation against anyone who makes a report in good faith, their related parties, such as coworkers and family members, or is involved in the investigation thereof.

X. DISSEMINATION AND TRAINING

Compliance with this Policy is an obligation of all Employees and Directors.

In order to ensure compliance with this Policy, Ferrovia (i) will disseminate it as widely as possible among its Directors, Employees and the Directors and Employees of the companies that comprise the Group and (ii) must include this Policy in the contents of the obligatory training for all Directors, and Employees.

XI. DISCIPLINARY MEASURES

Breach of this Policy or any Applicable Anticorruption Laws may lead to criminal liability of Ferrovia as well as very serious personal liability for offenses committed for or on behalf thereof, and in direct or indirect benefit thereof, by its legal representatives and by *de facto* or *de jure* directors, as well as by any other person subject to the authority of the Directors and Employees of Ferrovia, including prison terms as well as large fines, legal fees and damage to the brands and reputation of Ferrovia.

Breaches of this Policy shall be sanctioned pursuant to the applicable internal procedures, collective bargaining agreements and legal regulations. Likewise, the regulations applicable in the different jurisdictions in which Ferrovia performs its activities shall be taken into account. Any Director or Employee who breaches this Policy shall face disciplinary action, up to and including termination.

XII. VALIDITY

This Anticorruption Policy has been approved by the Board and will enter into force from the date of its publication on the Ferrovia Intranet.