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1	12/18/2014		N/A
2	26/10/2022	Update and adaptation to new reference standards	NPRH 0112
3	18/06/2025	To adapt the Policy to the new Belonging&Inclusion Policy, and to remove some unnecessary language	N/A

Human rights recognize and protect the dignity of all people, without distinction of race, sex, nationality, ethnic origin, language, religion or any other status. Ferrovial is firmly committed to ensure their compliance and formalizes it through its Business Code of Ethics and the present Policy.

## AIM

This policy aims to ensure the protection and respect of human rights at Ferrovial and raise awareness about them throughout the company. Therefore, Ferrovial is firmly committed to complying with this policy in the practice of its activities.

## POLICY FRAMEWORK

Ferrovial's Human Rights Policy is aligned with the international principles and standards mentioned in Annex I. In addition, this policy is just one of Ferrovial's policies, procedures, commitments and initiatives related to human rights listed in Annex I.

## SCOPE OF APPLICATION

This Policy will apply to Ferroviaal N.V. and the companies that comprise its Group, regardless of the business or activities they perform or their geographical location.

For these purposes, “Group” or “Ferroviaal” refer to both Ferroviaal N.V. and the group of companies headed by said company, which includes all the companies that, directly or indirectly, are under Ferroviaal’s control. It is understood that the company is in “control” when it holds the majority of the voting rights of the administrative body.

Ferroviaal strives to ensure compliance with the principles established in this policy throughout the companies in which it has control.

## POLICY PRINCIPLES

### 1. Respect, support and promote human rights

Ferroviaal collaborates with government agencies, international organizations, civil society and other institutions to promote values consistent with the Universal Declaration of Human Rights and other relevant principles and declarations for the purpose of this Policy, within its sphere of influence.

Ferroviaal promotes respect for human rights in those communities in which it performs its activities and fosters a respectful and dignified work environment for all people, through training and raising awareness about the matter.

Ferroviaal seeks to implement actions aimed at ensuring that this policy and the principles that it is based on are known, understood and accepted by its employees and the rest of the stakeholders.

### 2. Identify, prevent and mitigate

Ferroviaal seeks to identify and make efforts to prevent and mitigate the potential negative effects that the operations of the Group’s value chain may have on human rights. To do this, it implements corporate procedures, as well as compensatory measures if they are necessary or appropriate. Annex I summarizes the main aspects of these internal regulations in relation to the purpose of this Policy.

### 3. Reject any type of discrimination

Ferroviaal does not tolerate discrimination based on age, race, sex, religion, disability, opinion, political ideology, sexual orientation, social origin or any other personal or social status or circumstance. Ferroviaal aims to be diligent in implementing the necessary measures to ensure non-discrimination in specific and sensitive situations, such as recruiting and

promotion processes, the setting of remuneration or working hours or the treatment of sensitive groups such as union representatives and ethnic minorities, amongst others. To this end, in addition to this Policy, Ferrovial has established procedures, in accordance with applicable law, to follow in cases where it is necessary, and a culture of belonging and inclusion.

#### **4. Ensure safety based on respect for human rights**

Ferrovial has implemented safety measures and procedures to create a safe and healthy work environment for its employees and contractors, as well as to foster the safety of the users of its infrastructure.

#### **5. Assess, review and communicate**

For the sake of transparency, this Policy will be published on the Ferrovial website.

As part of its due diligence measures, Ferrovial periodically assesses the potential threats to human rights, aiming to respect the rights of the agents involved in the execution of its operations.

Annually, the Group will report publicly through the Integrated Annual Report on the steps taken each financial year on the implementation of this policy and the results of its application.

Likewise, it undertakes to periodically communicate, with the maximum possible transparency, the significant incidents detected related to human rights and the consequent remedial actions.

Ferrovial will periodically review the content of this policy to ensure that it conforms to best practices in this area.

### **STAKEHOLDER ENGAGEMENT**

The company seeks to extend its commitment to its employees, customers, suppliers and contractors, as well as to the communities that might be affected by its activities, subject to applicable law.

#### **1. Employees**

Ferrovial recognizes the rights of its employees, in accordance with the Declaration of Fundamental Principles and Rights at Work adopted by the ILO, and works to:

- Prohibit child or forced labor in any of its forms, together with any situation that may represent a form of modern slavery or that is related to human trafficking.
- Ensure equal opportunities and non-discrimination based on sex, age, culture, nationality or other circumstances or personal qualities for its employees.
- Protect personal integrity through procedures that aim to prevent workplace and sexual harassment as well as through other measures.
- Ensure freedom of association and the right to collective bargaining, recognizing workers' representatives rights, facilitating their activity and enabling channels of information and participation relevant to the development of their activity.
- Foster a work environment that allows for a balance between professional and family life.

Ferrovial has created an Ethics Line through which to communicate queries, incidents or complaints.

In line with the foregoing, Ferrovial respects the ILO conventions, especially those that are the most relevant to its activity, listed in Annex I.

Furthermore, Ferrovial works to implement measures and initiatives with the aim of protecting the right to digital disconnection, respect for confidentiality, consistent with law, and the right to intimacy and privacy.

## **2. Customers**

Ferrovial pursues high standards of quality, health and safety in its services and projects. Likewise, it prohibits unlawful discrimination against its customers. Finally, to foster transparency, Ferrovial is committed to provide information to its clients on the performance of its operations regarding human rights and the right to privacy.

## **3. Society**

Ferrovial seeks to comply with local laws and respect the rights, culture, customs and values of people in the local communities and minorities potentially affected by the execution of its activities, paying special attention to populations particularly vulnerable such as migrants. In this sense, and in accordance with its Corporate Social Responsibility Policy, it contributes to the development of social projects.

Ferrovial respects and recognizes the rights of indigenous, tribal and native peoples, in accordance with existing legislation and with ILO Conventions 107 and 169.

Likewise, Ferrovial is committed to minimizing the environmental impact of its operations in the communities that may be affected, taking a preventive approach, where appropriate,

that tackles current environmental challenges, such as the proper management of water resources or the supply of sustainable products.

Ferrovial respects the laws of the countries in which it operates. In the case of those countries in which the legislation does not guarantee respect for human rights, Ferrovial aims to implement the necessary measures to comply with this policy.

#### **4. Suppliers, contractors and other collaborators (joint ventures and partners)**

Ferrovial establishes and develops appropriate procedures to evaluate and select suppliers, contractors and other collaborators, promoting respect for human rights throughout its supply chain. In this regard, Ferrovial has a Code of Ethics for Suppliers, which includes the basic principles that govern their behavior in their relationship with Ferrovial. It complements other corporate policies, especially the Corporate Code of Ethics, as well as the Corporate Social Responsibility, Sustainability, Quality and Environmental and Anti-corruption Policies.

To the extent consistent with applicable law, Ferrovial may collaborate with suppliers and contractors in the implementation of the ILO Declaration of Fundamental Principles and Rights at Work, especially of the most relevant conventions listed in Annex I.

#### **Complaints and grievance mechanisms**

In order to respond to possible unwanted situations that may arise and facilitate communication with all its stakeholders, Ferrovial has an Ethics Line, which allows any interested party to report possible situations of harassment and other discriminatory practices. It can be accessed by telephone, mail, intranet or the Ferrovial website, allowing communications to be carried out confidentially and/or anonymously if desired. Ferrovial protects informants or informers from any possible retaliation.

When necessary, and as a complement to its Ethics Line, Ferrovial will provide specific communication channels to special stakeholders, giving them the necessary guarantees and implementing the necessary procedures to identify any situation that might pose a threat to human rights, subject to applicable law.

### **COMPLIANCE AND MONITORING**

The actions derived from this Policy will be monitored, and the Board of Directors will be informed about its application.

The Ethics Line is managed by the Compliance Department, with the support of the Internal Audit Department for the analysis of high priority communications. The Compliance Department is in charge of managing the communications received through the Ethics Line and taking the necessary measures in each case, assigning the resolution of the

communications to the Ferroviale departments that it deems appropriate according to the content of the communication. In addition, one of its functions is to guarantee the confidentiality of the communications received and the non-adoption of coercive measures against the informants, in accordance with and subject to applicable law. The Compliance Department will periodically inform the Senior Management and the Audit and Control Committee of relevant communications received and the steps taken with respect to them.

All Ferroviale employees are responsible for compliance with this Policy and must report possible breaches of it through the Ethics Line.

## **ANNEX I – INTERNATIONAL STANDARDS, RELATED INTERNATIONAL REGULATIONS, INTERNAL POLICIES AND PROCEDURES**

### **Main international standards for or related to human rights:**

- The International Bill of Human Rights, made up of the Universal Declaration of Human Rights proclaimed in 1948 by the United Nations General Assembly, the International Covenant on Civil and Political Rights and its two protocols, and the International Covenant on Economic, Social and Cultural Rights.
- United Nations Guiding Principles on Business and Human Rights.
- Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Companies.
- United Nations Convention on the Rights of the Child.
- United Nations Convention on the Rights of Persons with Disabilities.
- The Ten Principles of the United Nations Global Compact.
- Agenda of the United Nations for 2030: Sustainable Development Goals.
- European Convention on Human Rights.
- Regulations of the International Labor Organization (ILO).
- Modern Slavery Act of the United Kingdom.

### **The most important ILO conventions for Ferrovia operations and for the basic rights of workers:**

- Hours of Work (Industry) Convention (No. 1).
- Weekly Rest Convention (No. 14).
- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87).
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98).
- Equal Remuneration Convention, 1951 (No. 100).
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).
- Forced Labor Convention, 1930 (No. 29).
- Abolition of Forced Labor Convention, 1957 (No. 105).
- Minimum Age Convention, 1973 (No. 138).
- Night Work Convention (No. 171).
- Worst Forms of Child Labor Convention, 1999 (No. 182).

## **Ferrovial corporate procedures, commitments and initiatives that aim to support due diligence in relation to human rights**

The company has a set of tools that promotes the protection and respect of human rights in order to prevent, mitigate and compensate possible impact, thus implementing a due diligence system.

Ferrovial has a Business Code of Ethics and different procedures and tools. They are the following:

- Corporate Code of Ethics

The Code determines how Ferrovial interacts with the environment and reflects its commitment to three essential principles: integrity, compliance with the law and respect for human rights.

- Purchasing Policies

It includes the commercial, environmental, social and good governance principles that determine the company's relationship with its suppliers. This policy is applicable to subsidiaries and markets and is based on the Corporate Code of Ethics, the Corporate Social Responsibility to Respect Human Rights Policies, and the Due Diligence Procedure for the Ethical Integrity of Suppliers.

- Risk identification and assessment process (FRM):

The company has a risk identification and assessment process, managed by the Risk Department, under the regular supervision of the Audit and Control Committee of the Board of Directors.

The FRM process allows risk events to be identified and prioritized based on their probability and impact, in order to take the mitigation measures.

Amongst other risks, it includes the following related to human rights:

- Violation of human rights. Child labor, harassment, labor exploitation, discrimination (based on age, race, sex, religion, disability, political ideology, sexual orientation or social origin), restriction of freedom of expression and association.
- Defects in the established mechanisms (due diligence) to manage the investment analysis processes (includes defects in the verification of social, environmental and human rights aspects) or significant divestments.
- Work environment. Conflictive work environment that may generate situations of discrimination, hatred or violence towards an employee or group of employees based on religion or beliefs, ideas, race, ethnicity, sex, sexual identity or any other prohibited reason for discrimination.

- Labor regulations. Non-compliance with the legal framework that regulates the relationship between the Company and its employees, especially the safety and hygiene conditions that the company must ensure to its employees for the performance of their duties.
- Labor relations. Individual or collective conflicts with employees that harm the productive capacity of the company and/or its reputation.
- Inadequate remuneration and/or compensation schemes.
- Staff safety. Insufficient safety conditions for the people who work for the company. Risk of company personnel being subjected to extortion, threats or any other action that endangers their safety.
- Data protection. Non-compliance by the company with the legal obligation to protect the sensitive information of third parties and employees, given to the company by them and for the purposes authorized by them.

In addition to assessing the risk, the manager must identify for each risk the controls that are currently in place to mitigate or eliminate the risk, either its impact or its probability of occurrence.

- Transaction approval procedure according to corporate capital allocation criteria

This procedure establishes that:

*“It will always be assessed whether the proposed operation might affect Ferrovial’s ability to comply with its policies or the ethical principles by which it is governed, or the good reputation of the group. Human rights, social aspects, good governance and the environment will be considered. If there are risks, and in any case in public tenders in new countries and in the takeover of companies, a report on the problems detected and the measures to be implemented will be included.”*

- Due Diligence of Ethical Integrity for Third Parties Policy

This procedure must be followed prior to reaching an agreement of collaboration, association, acquisition of goods or services, or of any other type between a Third Party and Ferrovial N.V. or any of the companies in its Group, as well as during the term of their commercial relationship. It aims to prevent attitudes and actions contrary to human rights in relations with third parties.

In this sense, it requires the third party to carry out a due diligence process of ethical integrity, which includes the area of human rights.

- Due Diligence of Ethical Integrity for Suppliers Procedure (includes the Code of Ethics for Suppliers)

The Code of Ethics for Suppliers includes amongst its principles the respect for human rights and the abolition of child labor. The procedure establishes the general criteria of the due diligence process of ethical integrity in the selection of a Supplier and their monitoring during the term of the commercial relationship.

**Additionally, Ferrovial has other policies, procedures and initiatives related to human rights:**

- Code of Ethics for Suppliers.
- Health and Safety Policy.
- Corporate Social Responsibility Policy.
- Sustainability Policy.
- Quality and Environment Policy.
- Corporate Cybersecurity Policy.
- Flexibility and Conciliation Policy.
- Compliance Policy.
- Anticorruption Policy
- Lobbying and Political Contributions Policy.
- Procedure for the Approval and Monitoring of Sponsorship Projects, Patronage and Donations.
- Harassment Prevention Protocol.