

# SUPPLIERS' CODE OF ETHICS

2025

ferrovial

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## INTRODUCTION

Ferrovial's values, as reflected in its Code of Ethics and Business Conduct (“**Code of Ethics**”) reflects environmental, social and good governance commitments. In line with these commitments, Ferrovial promotes responsible behavior in its supply chain, in working towards 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 applicable local and international laws at any given time.

## PURPOSE

The purpose of the Suppliers’ Code of Ethics (the “**Suppliers’ Code**”) is to establish the ethical principles that should govern the activity of Ferrovial’s suppliers. The Suppliers’ Code of Ethics is therefore an element of the due diligence process designed to promote the ethical integrity of Suppliers and the prevention of unethical behavior.

Ferrovial encourages and expects these principles to be shared by its suppliers, who should follow them and in turn pass them onto their own suppliers and subcontractors engaged in connection with their commercial relations with Ferrovial, while respecting all applicable local and international laws at any given time.

In line with these principles, Ferrovial requires its Suppliers to reject any act that could be considered corruption or bribery and requires compliance with any applicable anticorruption regulation.

The provisions of this Suppliers’ Code are without prejudice to the additional conditions and requirements that may be established in relevant applicable regulations, practices and rules, 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, under applicable circumstances, terminate the contractual relationship with those suppliers who fail to comply with any of the principles established in this Suppliers’ Code.

Likewise, Ferrovial seeks to monitor the performance of its suppliers, and may, when it deems necessary, carry out evaluations of compliance with the requirements established in the orders/contracts signed with them.

## SCOPE OF APPLICATION

This Suppliers’ Code applies to all suppliers of Ferrovial, regardless of their business sector, geographical location or activity.

“**Ferrovial**” or “**Group**” Means Ferrovial N.V., 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 to 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.

“**Supplier**” shall mean a natural or legal person, at arm’s length from Ferrovial, supplying products and materials, or providing works or services (with its own or subcontracted personnel) to Ferrovial.

## ETHICAL PRINCIPLES OF CONDUCT

The business and professional behavior of Suppliers are expected to comply with the following basic principles and fulfil the following commitments:

## 1. RESPECT FOR THE LAW

### Compliance with applicable laws

The Supplier's activities must be carried out in compliance with applicable regulations. It must avoid any conduct that could damage Ferrovial's reputation.

### Fair competition

The Supplier will avoid actions that may constitute an illegal practice of anti-competitive behavior and undertakes to ensure compliance with antitrust regulations.

### Anticorruption laws

The Supplier expressly assumes compliance with applicable anti-corruption laws, in particular those prohibiting bribery, and bribery of officials, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act 2010 ("UKBA") and 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 issuer to which such inside information relates, it must comply with the provisions of applicable regulations, including regulations governing insider trading, and observe Ferrovial's Regulation Fair Disclosure policy, as published on Ferrovial's website.

### Relations with 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, as required by law. In addition, any relationship that the Supplier maintains with a representative of any government agency 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 in particular those held with Government Officials<sup>1</sup>

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<sup>1</sup> **Government Official:** Any official or employee of an administration, department, agency, legislative assembly, judicial body, agency or public international organization; any person who performs a public function or acts in an official capacity for a government a public international organization; or a political party, its employees or its candidates. Companies controlled by a government are classified as agencies of same. Some

Unacceptable conduct includes, but is not limited to, non-compliance with applicable 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 deceitful intent.

#### 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. COMMITMENTS TO THE COMMUNITY

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 valuing different perspectives, experiences and customs in force among the people and communities affected by its activities and shall ensure observance of the same principles throughout their supply chains.

### 4. HUMAN RIGHTS AND LABOR PRACTICES

#### Respect for human rights

The Supplier shall 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 and shall ensure observance of the same principles throughout their supply chains.

#### Abolition of child labour

The Supplier shall not use child labour 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 and shall ensure observance of the same principles throughout their supply chains.

#### 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 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

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examples of Government Officials are as follows; (i) federal, state, regional and municipal employees; (ii) employees of public international 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.

the appropriate health and safety measures.

## Equal opportunities

The Supplier shall not discriminate against its employees 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 or any other basis prohibited by law. The Supplier assumes responsibility for maintaining a work environment free from unlawful 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 labor, understood as any work or service required from a person under the threat of any negative consequence if it is not performed and shall ensure observance of the same measures throughout their supply chains.

## Respect for freedom of association and collective bargaining

The Supplier shall facilitate the exercise of the rights of association and collective bargaining as set forth in the ILO Declaration on Fundamental Principles and Rights at Work.

## Working conditions

The Supplier shall guarantee its employees fair working conditions in accordance with applicable law.

## 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 and respect for third parties' information and personal data

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 it 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 Ferrovial and for reasons of legal obligation or compliance with judicial or administrative decisions. Likewise, it will respect the confidentiality and privacy of personal data in its possession in accordance with the applicable legislation.

## 6. ENVIRONMENT

### Environmental requirements

The Supplier undertakes to comply with applicable environmental legislation, as well as to comply with in force regulations regarding the sourcing of conflict materials (some minerals and tropical woods) and from risk areas. In the case of site subcontractors, it shall ensure compliance with the regulatory environmental permits prior to commencement of work.

### Pollution and greenhouse gas emissions prevention

In the development of its production activities, the Supplier will ensure that it has the appropriate mechanisms in place to prevent incidents that could result in environmental pollution. Likewise, it shall consider energy consumption in the development of its activities with the aim of minimizing greenhouse gas emissions.

### Efficient use of natural resources

The Supplier shall make reasonable and efficient use of the natural resources it employs.

Thus, Ferrovial recommends that its suppliers have quality and environmental policies that guarantee sustainable and respectful performance.

## Waste management

The Supplier shall have the appropriate mechanisms in place to allow proper waste management to facilitate its correct treatment according to the applicable regulations.

## Biodiversity

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

## ETHICS CHANNEL

The Supplier may report any irregular practices related to non-compliance with or breach of the principles contained in this Suppliers' Code through the Ethics Channel available on the Ferrovial website <https://www.ferrovial.com> and the toll-free telephone numbers described in the "Telephone line" section of the Ethics Channel.

Ferrovial respects the confidentiality of communications and, if desired, the anonymity of those who use the Ethics Channel (to the extent feasible and permitted by applicable law) and will not tolerate any form of retaliation with respect to senders acting in good faith.