

INTEGRITY

Key to sustainable competitiveness

The Compliance Program, approved by the Board of Directors, aims to contribute to Ferrovial's sustainability, promoting compliance with all applicable laws and the Code of Ethics, based on an effective risk management system.

Ferrovial's growing international presence has determined the transformation of its Compliance Program in recent years, positioning it at the forefront of compliance and risk management systems.

The Compliance Program is directly supervised by the Board of Directors of Ferrovial through the Audit and Control Committee, under whose Chairman depends the Compliance and Risk Director, reporting on the progress of the program periodically to the Committee and at least every six months to the Board.

COMPLIANCE RISK PREVENTION

The Compliance Policy describes the Compliance Program, which is based on an effective risk management system. To this end, it has established a common process of evaluation, monitoring and control of compliance risks under the principle of "zero tolerance" to corruption and, in general, to the commission of criminal acts.

The Compliance Program includes a Crime Prevention Model that aims to prevent the risks of committing criminal acts, especially those involving the criminal liability of the legal entity.

In 2022, the Compliance Program certifications were renewed in accordance with the reference standards UNE 19601 "Crime Prevention System" and UNE-ISO 37001 "Anti-Bribery Management System", both obtained for the first time in 2019. Likewise, the Compliance Program includes a Tax Compliance Model certified in 2021 and revised in 2022 in accordance with UNE 19602.

TRAINING AND COMMUNICATION

Every two years, the Compliance and Risk Director submits a training and communication plan for approval by the Audit and Control Committee of the Board, and periodically evaluates its effectiveness to promote a culture of ethics and integrity and to make the entire workforce aware of the Code of Business Ethics and the policies and procedures that develop it.

In 2022, the course Compliance Boot Camp has been deployed throughout the Group, on a mandatory basis for all employees, whose objective is to review some of the policies and procedures that develop the principles contained in the Code of Ethics, in particular, the anti-corruption policy, lobbying and political contributions policy, the policy on gifts and hospitality expenses, the policy on sponsorships, patronage and donations, the policies and procedures for due diligence of third parties and the policy of the ethical channel and management of inquiries, complaints and grievances.

Likewise, training sessions on competition issues were given to employees with greater exposure to the risk of non-compliance with the antitrust laws applicable in the jurisdictions where Ferrovial operates, with the aim of providing tools to help identify and avoid practices that could be considered anti-competitive. The conference "U.S. Antitrust Law and Spanish / EU Competition Law" is worth mentioning.

ANTI-CORRUPTION POLICY

Ferrovial's Anti-Corruption Policy establishes rules for the behavior of Ferrovial employees, executives and directors, as well as third parties with whom the Group has dealings, under the principle of "zero tolerance" for any practice that could be considered corruption or bribery. The policy requires compliance with all applicable anticorruption laws and urges the reporting of any infringement thereof or of internal regulations on the matter.

Ferrovial requires behavior in accordance with the highest ethical standards from third parties with whom it has dealings. To this end, a due diligence process of ethical integrity of third parties is followed in accordance with international best practices, applying the corresponding policy or procedure in each case.

Compliance training

In 2022, the online training plan on the Code of Business Ethics and Compliance Policy (Prohibited Conduct) continued, as well as courses on anti-corruption and data protection, among others. The training volume of these courses, together with the competence courses, on the ethics channel and the Compliance Boot Camp, amounted to 5,718 hours, accumulating a total of 16,483 hours of training in the last three years. Most of these courses are included in the mandatory training plan for new recruits.

Also during 2022, communication campaigns called "Did you know?" were carried out on relevant aspects of compliance policies and two "Spotlight on ..." articles were published, highlighting the work of some employees for their collaboration in promoting Ferrovial's culture of integrity.

Ethics channel

Its purpose is to facilitate the communication of any possible irregularity, non-compliance or behavior contrary to ethics, legality and Ferrovial's internal rules. In accordance with the ethics channel and management of queries, complaints and reports, all communications derive in an investigation by the person in charge of their management, guaranteeing confidentiality, legal protection and absence of reprisals of any kind to the informants.

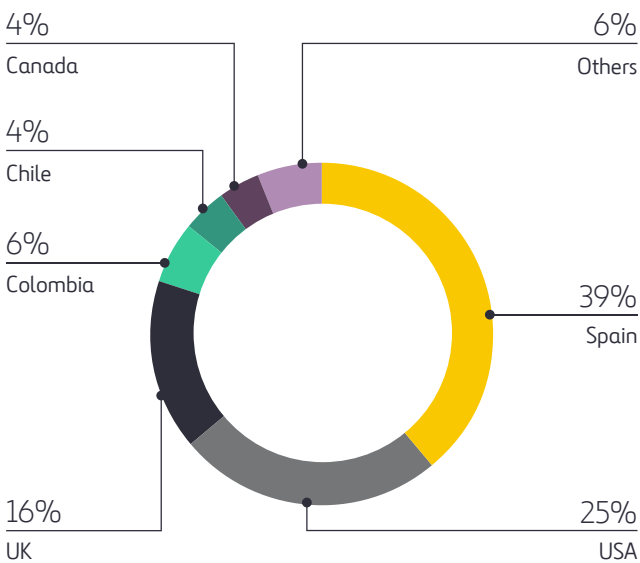
During 2022, 130 communications were received through the various communication channels (142 in 2021), of which 49 came through the Ethics Channel (85 in 2021). The number of communications received per 1,000 employees amounts to 3.78 (1.9 in 2021). Of the 130 communications received in 2022, 55% were anonymous (58% in 2021), 49% were considered substantiated (40%* in 2021) and corrective measures were agreed in 95% of cases (85%* in 2021). Disciplinary action, training and process change were the main actions taken. In 2022, Ethical channel communications have been investigated and resolved within an average of 30 days (67 in 2021). No case investigated has given rise to significant impacts for Ferrovial from a criminal, economic or reputational point of view.

Number of communications per 1,000 employees	
2021	2022
1.9	3.78

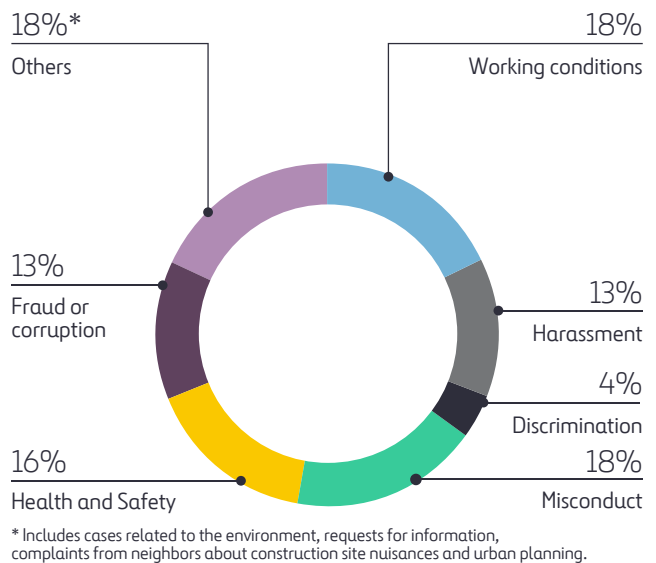
Average resolution time for communications (days)	
2021	2022
67	30

COMMUNICATIONS ETHICS CHANNEL 2022

COUNTRY OF ORIGIN



TYPE OF COMMUNICATION



CODE OF ETHICS

Ferrovial's Code of Business Ethics makes it mandatory to report any breach of legislation or internal regulations. To this end, the Ethics Channel is available, a confidential and, if requested, completely anonymous system that guarantees users the absence of reprisals. It can be accessed by telephone, mail, via the intranet or the corporate website (www.ferrovial.com). Likewise, in certain subsidiaries or areas of activity that require it due to their importance, specific communication channels have been established.

The Compliance and Risk Management is responsible for managing the Ethics Channel, with the support of Internal Audit for the analysis of high priority communications, and reports quarterly to the Audit and Control Committee and annually to the Board of Directors on the communications received and the actions taken.

During 2022, a global Compliance awareness campaign was launched in 10 countries and 290 workplaces, including posters and audiovisual resources, to reinforce knowledge of the Code of Ethics and the Ethics Channel among all Group employees.

* After the 2021 communications closure.