

ANTI-CORRUPTION POLICY

Approved by the Board of Directors on March 21, 2023

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1. PURPOSE

Dragados, S.A., its affiliates and subsidiaries (hereinafter collectively referred to as “Dragados Group” or “the Company”) have, throughout their history, sustained a business commitment to the different parties involved with the Company and its employees, based on a set of values and ethical principles governing Dragados Group’s operations and constituting an integral part of its corporate culture.

Adherence to business quality standards is assured by our Code of Conduct. Dragados Group prohibits any form of bribery involving authorities, government officials, directors and employees belonging to publicly or privately owned national or international companies or bodies, as well as any third party with whom the company has any type of relationship.

In accordance with the aforementioned commitment, this Anti-corruption Policy has been adopted, developing the provisions of our Code of Conduct in order to establish a regulatory framework and the basic rules for the prevention and detection of activities constituting corruption and bribery in the Company's operations, as well as to promote full compliance with anti-corruption and anti-bribery regulations by Dragados Group.

2. SCOPE

This Policy is applicable to all directors, managers and employees of Dragados Group, regardless of their area of activity or hierarchical level, whether in construction sites, machinery yards, factories, headquarters or branches.

Likewise, it will be applicable to all those individuals who act within and before other entities in the name of and on behalf of the Company, who in that case, and within their powers, must actively promote that the principles contained herein be applied.

3. COMPLIANCE BODY

Dragados, S.A. has appointed a Compliance Committee as the collegiate body in charge of the tasks of monitoring and controlling compliance with the Code of Conduct, and which is made up of the General Secretary, the Resources Director, the General Counsel, the Internal Audit Director, the Compliance Director and an independent Member (specialist in Criminal Law).

The Compliance Committee holds independent initiative and control powers to prevent criminal offences from being committed. It shall have sufficient human, financial and material resources to design, develop, implement, evaluate, maintain and improve the Criminal Compliance and Anti-Bribery Management System (to which this Anti-corruption Policy pertains), as well as the results thereof.

4. OPERATING PRINCIPLES

Dragados Group has adopted this Anti-corruption Policy in order to set a zero-tolerance standard with regard to any form of corruption and bribery.

In order to prevent corruption and bribery, Dragados Group will conduct all of its activities in accordance with existing anti-corruption and anti-bribery legislation in all areas of operation and in all countries where it operates, consistently with its spirit and purpose. In general terms, Dragados Group expressly and strictly prohibits the following practices:

- Making a promise or offering any kind of payment to authorities, government officials, directors or employees belonging to publicly or privately owned companies or bodies, operating nationally or internationally, either directly or indirectly by means of agents, intermediaries, advisers or any other proxy.

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- Obtaining undue advantages from the use of personal relationships with public authorities or civil servants or any other private parties.

Dragados Group requires that all decisions made by company employees who have any kind of relationship with national and international public administrations be made in strict compliance with the law, the Code of Conduct and the Company's Internal Regulations.

a) Gifts, Presents and Favors:

It is strictly forbidden for Dragados Group's employees to offer or accept gifts, presents, hospitalities or favors in the course of their activities. Exceptionally, it is permissible to give or receive gifts and presents, as long as they are not prohibited by law, correspond to normal, customary and generally accepted business practices or demonstrations of courtesy, and have in all cases a symbolic or negligible economic value.

In any case, the provisions of the Policy on Gifts, Presents, and Favors must be complied with.

b) Facilitation Payments:

Facilitation payments are understood to be those small, illegal and unofficial payments made to government officials or employees of a private company, which are intended to enable them to speed up or facilitate the performance of their duties, such as gaining access to public services, obtaining ordinary licenses or business permits, administrative procedures (e.g., telephone, electricity or water utilities, etc.), providing police protection or loading and/or unloading goods, among others.

Facilitation payments are strictly prohibited under this Policy.

Any activity that could lead to a facilitation payment made by the Company or on behalf of the Company or that could suggest that any such payment was to be made will be avoided.

c) Donations to Charitable Organizations and Sponsorships:

Charitable donations and Sponsorships must meet the following requirements:

- Be permitted by law.
- Not disguise illegal payments to Government Officials, Public Administrations, publicly or privately run bodies or companies, or any other third party, whether in Spain or abroad, which violate anti-corruption regulations.
- Not constitute a vehicle for financing illegal activities in violation of legislation on preventing money laundering and on the financing of terrorism, or of any other applicable law or regulation.
- Be properly documented.

It is also a requirement, in addition to the above, that partners bound by sponsorship contracts must be well known, reliable and have an excellent reputation.

In the event that it is in the Company's interest to participate in the sponsorship of an event, or to install a stand at Trade Fairs and Congresses related to the sector, the corresponding Director shall inform the General Secretariat, who shall be responsible for preparing and carrying out said events, subject to the authorisation of the Chief Executive Officer, as established in the Internal Standard on Corporate Image Regulation (MNI-06).

Any and all donations must be previously and expressly authorised by Dragados' Chief Executive Officer and will be made to reliable and highly reputable charities, always in compliance with the criteria set out in Dragados Group's Policy on Gifts, Presents, and Favors.

d) Contributions to Political Parties, Groups or Political Organizations:

Contributions intended for political purposes are strictly forbidden under the provisions of this Policy.

e) Intermediaries, Agents, Advisers and Business Partners:

Entering into contracts with Intermediaries, Agents, Advisers and agreements with Business Partners for transactions or operations in which a Spanish or foreign Public Administration, Agency, or any other publicly or privately owned company is involved in any way will be subject to the strictest due diligence requirements.

As far as possible, top-class, reputable companies will be used as commercial agents, advisers, intermediaries or business partners.

Due diligence mechanisms shall be established so as to acquire the best possible insight into the people who intervene as agents, advisers, intermediaries or business partners and their collaborators, ensuring that the most suitable candidates are chosen to carry out their activities in an ethical manner and preventing any possible adverse economic consequences or reputational risks for Dragados Group.

Agents, advisers, intermediaries or business partners will be informed - keeping a documentary record of this fact - of all the prohibitions that Dragados Group has formulated regarding corruption. In this document, they shall state that they are aware of these prohibitions and that they are committed to strictly complying with them. These prohibitions shall also be expressly and unequivocally included in the contracts entered into with the agents, advisers or intermediaries.

f) Books and Records:

Dragados Group shall faithfully and transparently, fully and appropriately keep records of all actions, operations and transactions of the Company in the Company's books and records.

5. TRAINING

Dragados Group will promote the necessary training for all the Company's personnel in order to broaden their knowledge of our ethical principles, as well as the duties and operating principles derived from our Code of Conduct and Anti-corruption Policy.

6. REPORTING SUSPECTED MISCONDUCT AND OTHER QUERIES

Any employee or third party who has reasonable knowledge or suspicion of an alleged non-compliance with this Policy must address their communications to the Ethical Channel through one of the channels listed below:

a) Ordinary Channels:

- Direct line manager or the Director concerned;
- Member of the Compliance Body;
- Compliance Department/Compliance Manager.
- By post to:

**To the attention of: Ethical Channel DRAGADOS Group
Avda. del Camino de Santiago 50, 28050 Madrid, Spain.**

b) Alternative Channels:

- The on-line channel accessible through the website and corporate intranet of each of the Company's subsidiaries and branches, or directly through those of Dragados:

<https://www.dragados.es/html/cumplimiento.html>

or directly via the following link:

<https://secure.ethicspoint.eu/domain/media/eseu/gui/108739/index.html>

- The 24 hour, 7 days a week telephone channel

<u>Country</u>		<u>Telephone number</u>
Spain		900876043
United States of America	Dragados USA, Inc	866-280-6816
	Schiavone Construction Co LLC/Prince Contracting LLC/J.F. White Contracting Co, Inc.	866-777-6115
	John P. Picone, Inc.	877-452-3540
	Pulice Construction, Inc	877-452-3541
Argentina		0800-345-1362
Canada		844-985-2427
Chile		800914073
Peru		80078578
Poland		800 005 063
United Kingdom and Northern Ireland		0800 048 5534

This channel is both a means of reporting non-compliance with the rules contained in this Policy, as well as a means of resolving any doubts that may arise from its application.

Dragados Group guarantees that there will be no reprisals of any kind against those who make communications in good faith in accordance with the provisions herein.

7. BREACH

Dragados Group will make every effort to prevent any conduct that constitutes a breach of this Policy and/or the applicable legislation, as well as to interrupt and sanction any conduct contrary to said regulations on the part of the Company's employees, managers and directors or third parties acting on behalf of the Company.

Failure to comply with the provisions of this Policy and applicable law may result in serious consequences for the Company, its employees, managers and directors.

This Policy has the status of a mandatory rule, so violation thereof shall be deemed to be an infringement and the Company shall adopt appropriate disciplinary measures, in accordance with labour legislation and the Disciplinary Regime contained in the applicable Collective Bargaining Agreement, notwithstanding any other responsibilities that the offender may have incurred.

8. MONITORING, EVALUATION AND REVIEW

This policy, as well as the Criminal Compliance and Anti-Bribery Management System, shall be subject to continuous monitoring, evaluation and review, and specifically when regulatory, social, corporate or any other type of circumstances so require. In any case, it shall be subject to annual review and evaluation.