

HUMAN RIGHTS POLICY OF THE FCC GROUP

The FCC Group manages essential environmental services and builds large infrastructures across the world. They are all activities growing in demand from citizens and that are essential for sustainable progress and the well-being of people.

The company strives every day to be a leader in global, efficient and innovative solutions, while wishing to be perceived as a fair and trustworthy employer, a good partner and collaborator, and always having a responsible commitment to the communities in which it operates.

1. Purpose

Through this Policy, aligned with the Guiding Principles on Businesses and Human Rights, approved by the United Nations Human Rights Council (2011), and with the Global Compact to which FCC adhered in 2006, the Group declares its commitment to respect the human rights contained in the United Nations Universal Declaration of Human Rights, and those contained in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as in the ILO's eight fundamental conventions.

The FCC Group understands that human rights must be protected and guaranteed by all States, but considers it essential that the company itself, within its sphere of influence and in accordance with the legal framework of each country, must respect them and encourage compliance with them.

In cases where national legislation and international human rights standards come into conflict, FCC will respect the legal framework, while seeking to protect the provisions of these international conventions as much as possible.

2. Scope of application

The protection of and respect for human rights, as a crucial element of the corporate culture and values of the FCC Group, are applicable to all activities in which the company has financial or operational control, regardless of their nature and the place in which they are carried out.

The FCC Group requires the same degree of protection among its partners, collaborators and suppliers, in accordance with the company's current Code of Ethics and Conduct.

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3. Commitment

Freedom of association and collective bargaining

FCC considers collective bargaining to be the basis for dialogue between the company and its employees, and undertakes to recognise at all times the right of workers to enjoy freedom of association, and to collaborate constructively with representatives freely chosen by the workers, within the national legal framework.

Decent and remunerated employment

FCC ensures fair and favourable working conditions, decent and remunerated employment and guarantees the right to rest and free time, in accordance with the country's labour legislation.

FCC is committed to fair and adequate remuneration based on the local labour market, the worker's training, experience and responsibilities, and in accordance with each country's labour agreements and legislation, including minimum wages, social benefits and overtime.

FCC opposes any type of violence, harassment or abuse in the workplace, complying with the regulations in force in each country, and striving to treat all the individuals with whom it works with dignity.

Forced labour and child labour

FCC opposes forced or involuntary labour, withholding of documentation, or any other modern form of slavery or servitude, as well as any form of torture, cruel, inhuman or degrading treatment.

FCC respects the rights of children and opposes child labour, in compliance with ILO Conventions 138 and 182.

Diversity and inclusion

FCC rejects any discrimination based on race, colour, gender, language, religion, political opinion, national or social origin, marital status, economic status, disability or any other personal condition.

Health and Safety

FCC guarantees the safety of its workers and its operations, continuously improving working conditions and creating a safe and healthy working environment.

FCC undertakes to carry out all necessary actions so as not to compromise the safety, health and integrity of its customers and users.

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Data privacy

FCC undertakes to responsibly use the personal data and information collected from the different international projects in which it operates, taking special care of the data of its employees and customers.

Respect for communities

FCC is committed to establishing relationships with respect and trust with the local communities in which it operates, raising awareness of their rights in terms of natural resources, access to healthcare, education, culture and tradition.

FCC is committed to respecting the specific rights of indigenous communities, their structures, territories and resources, in accordance with national and international conventions and regulations, establishing procedures for dialogue and minimising any impact on these rights.

FCC is committed to respecting the environment, valuing the life cycle of its activities, as well as promoting best practices and conduct in the management of its consumption, waste and emissions of polluting gases.

4. Development

In order to ensure that the basic principles contained in this Policy govern at all times the FCC Group's actions in human rights matters, and in accordance with the United Nations Guiding Principles on Business and Human Rights, the company will define and implement sufficient mechanisms to proceed with due diligence in matters of identification, prevention, mitigation and response.

In particular:

- Appropriate protocols will be approved for the ongoing identification, monitoring and management of the impacts of the Group's activities on human rights.
- A human rights awareness plan will be developed for employees, and for the internal and external dissemination of this Policy.
- Initiatives will be defined to extend the commitments of this Policy to our partners and collaborators.

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5. Governance

The Executive Committee of the Board of Directors is responsible for approving the FCC Group's Human Rights Policy and supervising compliance with it, which, in general, is in charge of supervising the company's Corporate Social Responsibility Policy.

The development of commitments and their monitoring will be carried out through the Group's Corporate Responsibility Committee and the CSR or business sustainability committees, under the coordination of the Corporate Responsibility, Human Resources and Purchasing corporate departments.

Although this policy must be respected by all FCC Group employees, it is the corporate directors and business managers in the different countries who are primarily responsible for the effective implementation of its commitments.

This policy, like the rest of the Group's policies, is aligned with the highest internal standard, the Code of Ethics and Conduct, and with FCC's compliance model.

Any violation of the Policy must be reported through the Group's Whistleblowing Channel, established in its Code of Ethics and Conduct.

Approved by the Board of Directors of FCC

Madrid, 30 July 2019