

## Report on due diligence assessments pursuant to the Transparency Act

### FCC CONSTRUCCION SUCURSAL NORUEGA

The following statement has been prepared in accordance with section 5 of the Transparency Act by FCC in cooperation with Enter Norway Consulting og Rettshjelp AS.

It is important for FCC to contribute to responsible business conduct, and in this regard, FCC has a continuous focus on respecting fundamental human rights and decent working conditions. FCC expects all suppliers and business partners to have the same focus to contribute to responsible business conduct.

The work to contribute to a responsible business conduct by focusing on fundamental human rights and decent working conditions is endorsed by the company's Board of Directors and general manager of the Norwegian branch, and the overall responsibility for compliance with the Transparency Act and for implementation and follow up of due diligence assessments lies with the top management. Management and employees from different units of the company are however involved in the process and responsibility is delegated in accordance with internal guidelines.

#### Description of the company' structure, area of operations, guidelines and routines

FCC Construcción S.A is a world leader in construction, with extensive experience accumulated over its 120 years of history. The company's activities cover all areas of engineering and construction, and they are the benchmark for civil works (roads, railways, airports, hydraulic and marine work, tunnels and bridges) and residential and non-residential building works such as hospitals, football stadiums, museums, and offices. FCC Construcción Sucursal Noruega was established to carry out construction projects awarded in Norway.

FCC Construcción Sucursal Noruega is as of now working towards the Sotrasambandet project, a public- private cooperation. Sotra Link AS was awarded by the Norwegian Public Roads Administration (Statens Vegvesen) to finance and carry out the Sotrasambandet project. Sotra Link AS has outsourced the work to two main contractors, one of them Sotra Link Construction JV ANS (FCC Construcción S.A, Webuild S.p.A and SK Ecoplant Co. Ltd) which projects and builds the road. FCC Construcción Sucursal Noruega which currently consist of twenty-five employees provides the JV ANS with needed assistance, including employees within administrative, fiscal, financial, technical and managerial fields.

The company operates in accordance with applicable legislation, the Human Rights Policy of the FCC Group and the Group's Code of Ethics and Conduct. In addition, specific company guidelines for accountability have been established in accordance with the Transparency Act.

The purpose of the Group's Code of Ethics and Conduct is to encourage all persons having links with any FCC Group company to observe the most stringent conduct guidelines in their commitment to complying with laws, legislation, contracts, procedures and ethical principles. It appears from the Code of Ethics and Conduct that respect for the dignity of individuals and their basic rights is a cornerstone of the FCC Group's conduct. 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 required the same

degree of protection among its partners, collaborators and suppliers, in accordance with the company's current Code of Ethic and Conduct.

The FCC Group applies the principle of due control to promote compliance with applicable internal and external regulations, and to prevent, detect and eradicate conduct that is irregular, inappropriate or contravening these regulations. The employees are periodically required to sign a solemn declaration undertaking to abide by the Code of Ethics and Conduct of the FCC Group. Potential infringement of the Code of Ethics and Conduct or the associated regulations may be reported through the Whistleblowing Channel. Communications through the Whistleblowing Channel are received by the Compliance Committee and confidentiality is guaranteed. The Compliance Committee is formed by corporate directors from Human Resources, Internal Audit, Legal Advice, and Corporate Compliance and Responsibility. The Compliance Committee investigates all reports promptly and diligently, recommending the appropriate measures to resolve the issue, and information is analyzed applying objective and unbiased criteria. Established routines in Code of Ethics and Conduct also apply for compliance with the Transparency Act and handling of actual or potential adverse impacts on fundamental human rights and decent working conditions.

#### Due diligence, routines for follow-up, measures

Respect for fundamental human rights and decent working conditions is a core aspect of the Group's and FCC Construcción Sucursal Noruega's value policy for responsible business conduct. The company is fully committed to respecting applicable laws and regulations, and follows contractual and all other legal requirements in connection with, among other things, wages- and working conditions, working hours, HSE, privacy, social life, discrimination, etc. The company has in this regard well established routines and guidelines for fulfilling legal requirements in connection with the work on fundamental human rights and decent working conditions.

As a supplier, the company adheres to key requirements regarding social responsibility, wages- and working conditions, HSE etc. In addition to continuous focus on legal compliance in its own operations, the company follows up subcontractors through contract terms, documentation requirements and audits in accordance with legislation, contract, and internal guidelines.

The company is not extensively connected to foreign subcontractors or business partners, and none of these are domiciled in geographically high-risk areas. There is good communication with subcontractors and business partners, who in turn have their own established routines and guidelines in relevant areas.

FCC conducts regular due diligence assessments in line with the OECD Guidelines for Multinational Enterprises, cf. Section 4 of the Transparency Act of its own operations, supply chains and business partners.

The company's due diligence assessments are based on the risk deemed particularly relevant taking into consideration industry, geography, and business. Both the company's own operations and the supply chain are continuously monitored for further assessment of identified risk factors, with an aim of prompt implementation of measures to the extent necessary.

This statement applies to the period 01.01.23-31.12.23. The report is updated and published by the 30th of June each year and otherwise in the event of significant changes in the company's risk assessments.

28.06.24

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*Pedro Manuel Rodriguez Hernandez - FCC*

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The board of FCC Construccion Sucursal Noruega  
Legal Representative

Pedro Manuel Rodriguez Hernandez

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*Carlos Pallares Rodriguez*

CEO/general manager

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