

Anti-Corruption Policy

1. Introduction

The Ethical Code of Obras Subterráneas S.A. (hereinafter referred to as OSSA or the Company) prohibits corruption or bribery of authorities or officials, as well as any solicitation or offering of advantages to third parties.

Additionally, it imposes on all those who are part of the organization a conduct governed by the values of integrity, honesty, and professional ethics.

2. Policy Overview

The purpose of this Policy is to determine the necessary measures to prevent, detect, and sanction fraudulent acts and the use of the Company's activities and resources to gain economic or other advantages.

3. Scope

This Policy applies to all employees, executives, and members of the management bodies of OSSA and refers to both individual and joint actions performed by or on behalf of the Company.

It applies to all companies within the OSSA group, including subsidiary companies and temporary joint ventures (UTEs, joint ventures) in which the Company may have a controlling interest.

This Policy encompasses all activities, processes, and relationships established by the Company and its employees, at all levels, whether formally documented through contracts, policies, procedures, or similar means, or applied through customary or habitual practice.

4. General Requirements

It is prohibited for any OSSA employee to offer, promise, or make, directly or indirectly, illicit payments in money or any valuable goods to third parties, whether individuals, government officials, or employees of private entities, both domestic and foreign, in order to obtain or retain any kind of business, favor, or interest.

Retaliation against any person who, in good faith, reports these practices within the Company to the appropriate authorities or to the management is strictly prohibited.

OSSA ensures the maintenance of accurate books and accounting records, and an appropriate system of internal accounting controls.

Bribery

- ✓ OSSA employees, as well as any person or entity working on its behalf, cannot offer, make, promise, or authorize the improper payment of any sum of money or valuable goods, directly or indirectly, to any government official, political party,

representative, member, or candidate of a party or political office in order to provide, obtain, or retain any business, favor, interest, or dishonest advantage for OSSA. This includes:

- Influencing any act or decision of the recipient in the exercise of their office.
- Inducing the recipient to act or refrain from acting in any way that constitutes a breach of their legal duties.
- Inducing the recipient to use their influence in the state, regional, or local administration, in the government, or in a public company, in order to alter or influence any act or decision of these entities.
- ✓ Any decision to favor OSSA with preferential conditions or provide confidential or private information that may give the Company an unfair advantage is included in this prohibition.
- ✓ Payments made on behalf of OSSA by third parties, such as those recommending the Company's products or services, advisors, and intermediaries, are considered to violate anti-bribery laws.

Measures to Prevent Corruption

- ✓ All expenses made on behalf of or on account of OSSA must be properly documented through invoices or payment receipts and included in the corresponding expense settlement. These expenses must always be reviewed and approved by a responsible or superior of the employee, and subsequently reviewed by the accounting department to verify their proper documentation and reasonableness.
- ✓ Payments will preferably be made against invoices submitted to OSSA. This rule will especially apply to travel expenses, accommodation, meals, entertainment, etc. When personalized payment methods (company cards) are used, corresponding receipts or invoices, as appropriate, should be provided.
- ✓ All expenses will be recorded in the Company's accounting, with the level of detail required by the applicable regulations.
- ✓ No payments will be made to expedite administrative procedures or obtain permits, licenses, authorizations, or similar, unless required by laws, such as in the case of fees or public prices.
- ✓ Any charitable donations must be authorized by the Compliance Committee.

To comply with this Policy and anti-corruption laws, OSSA will establish and maintain transparent books, records, and accounts of its activities, conducting internal controls to ensure compliance.

All expenses and payments, regardless of their nature, must be reliably and accurately reported in a timely manner, and their supporting documentation must be retained for the period established by the Company.

In San Sebastián de los Reyes (Spain), on May 06, 2025

Mr. Carlos Puente Costales

President

