

# FCC Group Tax Code of Conduct

## Introduction

This Code of Tax Conduct applies to all employees of the FCC Group and aims to establish the policies, principles and values that should guide all approach in tax matters within the FCC Group.

The Tax Code of Conduct complies:

- (i) with the corporate principles that define part of our Group's identity: do things properly, integrity, efficiency and proximity;
- (ii) with our Group's mission, consisting of designing, implementing and managing infrastructure services in order to meet the requirements and needs of our customers and contribute to the sustainable development of the communities in which we are integrated;
- (iii) with the FCC Group vision, which aims to become an international reference group in Citizen Services that contribute to the welfare and sustainable progress of society;
- (iv) with the Group's Corporate Social Responsibility policy and in particular with its Code of Ethics.

The FCC Group is well aware that the taxes it pays in each of the legal territories where it operates are a vital contribution to the development and progress of those societies. Consequently, when defining its fiscal policy, the FCC Group strives to create value for its shareholders and other stakeholders in a sustainable manner. To this end, all operations undertaken are always done for business reasons, in accordance with applicable law and taking into account the potential impact of its decisions regarding tax matters on the various communities we serve.

Finally, the FCC Group will uphold a policy of transparency in tax matters such that the markets and society are aware of its contribution to the common good.

On the basis of the above, the principles of action that all FCC employees must adhere to in relation to fiscal matters are defined hereunder.

## Obligations with regard to tax matters

### 1. Obligations for all employees

All employees of the FCC Group, to the extent applicable to them in terms of their individual duties and functions within the Group, shall comply with the procedures concerning tax management defined in the “**Framework Policy on Tax Control in the FCC Group**”.

### 2. Obligations for employees of the Tax Area

Workers with duties and responsibilities in the FCC Group’s tax departments are obliged to comply with the following requirements:

- a. To respect the relevant tax legislation in each legal territory on the basis of sufficiently grounded and well-reasoned interpretations and suitably verified facts.
- b. To abide by the “**Tax Function Control Framework Policy**”, as well as the procedures on communication, action and review specific to the Tax Function.
- c. To ensure that all relevant decisions on tax matters are supervised by the Group’s senior management and are properly supported from a global and integrated viewpoint that takes into account all different business variables and potential risks assumed.
- d. To develop and promote a relationship based on mutual transparency and trust with the tax authorities in each country.
- e. To actively participate in tax forums in those business associations and international organisations in which the FCC Group participates, in order to propose specific tax measures aimed at the attainment of a more just and harmonised tax system both for the interests of the Group and for those of society as a whole.