

# **PROCEDURE FOR THE MANAGEMENT AND CONTROL OF SPONSORSHIPS, PARTNERSHIPS, COLLABORATIONS AND DONATIONS**

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# 01 Objective

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# O2 Scope

This procedure is applicable to all companies in the construction area of the FCC Group (hereinafter FCC Construcción) belonging directly or indirectly to the parent company FCC Construcción, in Spain and abroad, as well as to joint ventures and companies in which the parent company has a direct or indirect holding of more than 50%.



**All companies of FCC Construcción**



**Joint ventures and companies  
in which the parent company has holding of > 50%**

# 03 References

01 Code of Ethics and Conduct

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02 General Standards Manual

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03 Anti-Corruption Policy

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# O4 Definitions

## 01 SPONSORSHIP

The act of supporting or financing an activity, usually for publicity purposes or in return for a benefit of a similar purpose.

## 02 ASSOCIATION

Monetary contribution given to an entity or institution with legal personality, as a cost of belonging to it.

## 03 COLABORATION

Participation in a specific project or activity promoted by a beneficiary entity, in compliance with the agreed aims.

## 04 DONATION

A contribution of money or goods that is given to an institution or organisation with legal personality, voluntarily and without expecting anything in return.

# O5 Management of sponsorship, partnership, collaboration and donation actions

5.1. Types of activities

5.2. Application and approval for sponsorship, partnership, collaboration or donation

5.3. Monitoring and control of the actions carried out

# 5.1. Types of activities

The activities that will be subject to the signing of an agreement or sponsorship agreement, partnership, collaboration or donation will only be those related to:



## **Activities linked to a commercial or branding action.**

Promotion of an event, professional forum and/or advertisement whose repercussion has an impact on the brand image of **the companies in the construction area**. These promotional activities shall always be for lawful purposes and shall be aimed at current and potential clients, suppliers, business partners or other institutions.



## **Sports activities (non-professional).**

Promotion of grassroots sport and sporting events that promote healthy lifestyles and/or have charitable purposes related to the sustainable development goals.



## **Cultural and social activities.**

Social and cultural projects, as well as educational and other projects, leading to a better quality of life for the community.



## **Environmental activities.**




Actions, acts or activities that promote the preservation and care of the environment.



## **Inclusion and/or annual renewal of membership in associations, forums.**

Authorisation will be requested for any sponsorship, donation or collaboration with third parties that directly or indirectly involves FCC Construcción.

It is expressly forbidden:

-  Making donations to candidates or political parties. It is strictly forbidden for Group companies, either directly or through intermediaries, to make, directly or indirectly, donations, even in the form of loans or advances, to candidates or public officials, or to political parties, including federations, coalitions, groups of voters, foundations or entities linked thereto. Exceptionally, and with the express authorisation of the chief of the head of the business, donations may be made to political parties in those countries in which this is expressly regulated by law and under the terms established therein, without in any case having the purpose of obtaining an undue advantage in the business.
-  Engage in sponsorship, collaboration and/or donation activities with bodies or entities that are not legitimately constituted.
-  Sponsorship of professional sporting events.

The Communication and Marketing Department, in accordance with the interests of the construction area, will disseminate the project or activity being supported through the most suitable media and channels.

## 5.2. Application and approval for sponsorship, partnership, collaboration or donation

Any collaboration, partnership, sponsorship or donation, including those made in kind (materials, finished products, constructions...), must be **channelled through the Communication and Marketing Department of the construction area**, so that the Communication and Marketing will analyse the suitability and nature of the activity to be sponsored, will assess the interest for the construction area and its repercussion in the media and will approve the sponsorship, collaboration or donation.

## AUTHORISATION

Authorisation will be requested for any sponsorship, donation or collaboration with third parties that directly or indirectly involves FCC Construcción.

In the case of sponsorship of programmes or spaces in the media, consideration shall be given to their content, the presence given to the brand, the exclusivity or otherwise of the sponsorship action, the frequency and audience of the space or programme and its cost per impact.

The forecast for Sponsorships, Partnerships, Collaborations and Donations will be detailed by each Area in the Annual Strategic Plan and will be approved by the General Management of the construction area.

When any of these actions are required, the applicant proposing the action shall complete the Application for Sponsorship, Partnership, Collaboration or Donation (according to Annex I) providing all the required information.


All applications (prior to the signing and agreement of sponsorship, donation, collaboration), which will require the signature of the director of the corresponding Area, will be sent to the Director of Communication and Marketing of the construction area together with all the complementary documentation that supports the application, such as:


- **Agreement or arrangement governing the agreed terms and conditions.**
- **Letter of application from the interested party.**
- **Any other document supporting that the contribution comes from a request from a third party.**

In the event that it is an initiative of the construction area and not of a third party, it must be justified with documentation, in addition to indicating the benefits that such an initiative can bring to the construction area.

Once the sponsorship, donation, association and/or collaboration control table has been received, the Director of Communication and Marketing of the construction area will proceed to analyse the organisation(s) to be sponsored, as well as the documentation associated with the request. Specifically, the following will be analysed: online and offline reputation, ongoing investigations, sanctions imposed .... The Director of Communication and Marketing of the construction area may request, if deemed necessary, additional documentation to support the request.

Once the Communication and Marketing has analysed and, if necessary, the Compliance Officer of the construction area has been consulted to ensure that the organisation is appropriate and that the purpose of the sponsorship does not contravene, in any of the cases, the provisions of the FCC Group's Code Ethics and Conduct, a favourable or unfavourable response to the proposal will be issued.

 **Unfavourable Response** to the sponsorship, partnership, donation and/or collaboration. The Director of Communication and Marketing of the construction area will communicate to the petitioner, with a copy to his immediate superior, the impossibility of carrying out the sponsorship, donation and/or collaboration.

 **Favourable Response** to the sponsorship, partnership, donation and/or collaboration. The Director of Communication and Marketing of the construction area will communicate to the petitioner with a copy to his/her immediate superior the approval of the sponsorship, donation and/or collaboration.

The organisation to be sponsored will then be contacted, requesting all the necessary information and documentation, as well as the sponsorship, donation and/or collaboration contract, which will be sent to the legal services of the construction area for analysis and comments.

Once the terms of the contract have been analysed and agreed the legal services of the construction area, the agreement will be signed by both parties, formally requiring the entity to sponsor the need to report the impacts/actions/presence of the company in the sponsored action.

For those actions not included in the annual Strategic Plan and which may arise during the year, the same procedure will be followed except that the Communication Directorate will analyse and supervise the nature of the request and respond within a maximum of 15 working days. If the characteristics of the request require a longer analysis time, the applicant will be informed of an extension of the deadline.

All such requests must be identified by indicating in the appropriate field of the application form "NOT INCLUDED IN ANNUAL BUDGET".

Any request for sponsorship, donation and/or collaboration in excess of €30,000 must also be authorised in writing by the General Manager of the construction area.

Once the application has been approved, it must go through the administrative process of order placement and/or Sponsorship/Partnership/Donation/Collaboration contract.

## 5.3. Monitoring and control of the actions carried out

Once the actions have been carried out and in order to have evidence of them, the proposer of the action will be in charge of completing the action file, sending to the Director of Communication and Marketing of the construction area the evidence of the actions carried out, including for example press articles, photographs taken on the day of the action, posters, etc. which must be clear and show with the highest level of detail the participation in the approved action.

The applicant for the donation, sponsorship, collaboration and partnership must send the following documentation to the Communication and Marketing Department within 15 days of the action taking place:



In addition, the Director of Communication and Marketing of the construction area will carry out quarterly samplings to check the correct compliance with this procedure by reviewing the registered requests, the approval flows, invoices as well as the evidence of the implementation of the approved actions.

Failure to comply with this procedure may lead to disciplinary action for those who do not comply.

# O6 Registers

All records associated with these procedures, both physical and digital, must be stored for a period of no less than 15 years, with the Communications Department being responsible for their safekeeping.



**+ 15 years**

# 07 Annexes

## **Annex I - Application for Sponsorship, Partnership, Collaboration and/or Donation**

