PROCUREMENT POLICY

FCC-DC-NC-07.7_ Scope of application and notification of procurement requirements for major works by FCC Aqualia and its subsidiaries

Procurement Department

Version: 7

Date: May 2026

Author: FCC Aqualia Procurement Department Reviewer/Approver:

Aqualia CEO

Contents

Version	Date	Responsible	Description of change
1	October 2015	Purchasing Department	Creation of the document.
2	May 2017	Purchasing Department	New investment format to replace the current procedure
3	December 2019	Procurement Department	Various updates
4	June 2021	Purchasing Department	Various updates
5	October 2022	Procurement Department	Inclusion Annex 2
6	July 2023	Procurement Department	Inclusion Annex 3
7	May 2026	Procurement Department	The application of the procedure is standardised and the financial approval thresholds are updated.

1. Scope

This document applies to all works with a budget of €100,000 or more
executed by FCC Aqualia and its subsidiaries, including:

i. Joint ventures, consortia or any other type of association with third parties controlled directly or indirectly by FCC Aqualia (where FCC Aqualia is the parent company, in accordance with the criteria set out in Article 42 of the Commercial Code) and integrated into FCC Aqualia's management system.
ii. Joint ventures with majority private capital where the Governing Body so decides at any given time (either generally or for specific purchases). Joint ventures with majority public capital are considered public sector entities and must subject their procurement to the provisions of the current public procurement regulations.
iii. Any other entity, association or consortium which, whether or not listed in the preceding points, requests the procurement service.

It shall also apply to works and projects with a lower budget if the FCC Aqualia Procurement Department (hereinafter DCAQ) so considers.

2. Introduction

The purpose of this procedure is to define the various areas of responsibility of Procurement Management in the major works of FCC Aqualia and its subsidiaries.

The provisions of this document are **binding**. Where, in specific cases, particular circumstances make it necessary to exclude certain areas or projects from the scope of this procedure, these shall be documented in a specific Annex, which shall be approved by the same persons who approve this document.

Likewise, the information channels to be used and the content required to communicate any procurement needs to the DCAQ are established.

3. Glossary of Terms

DCAQ: FCC Aqualia Procurement Department.

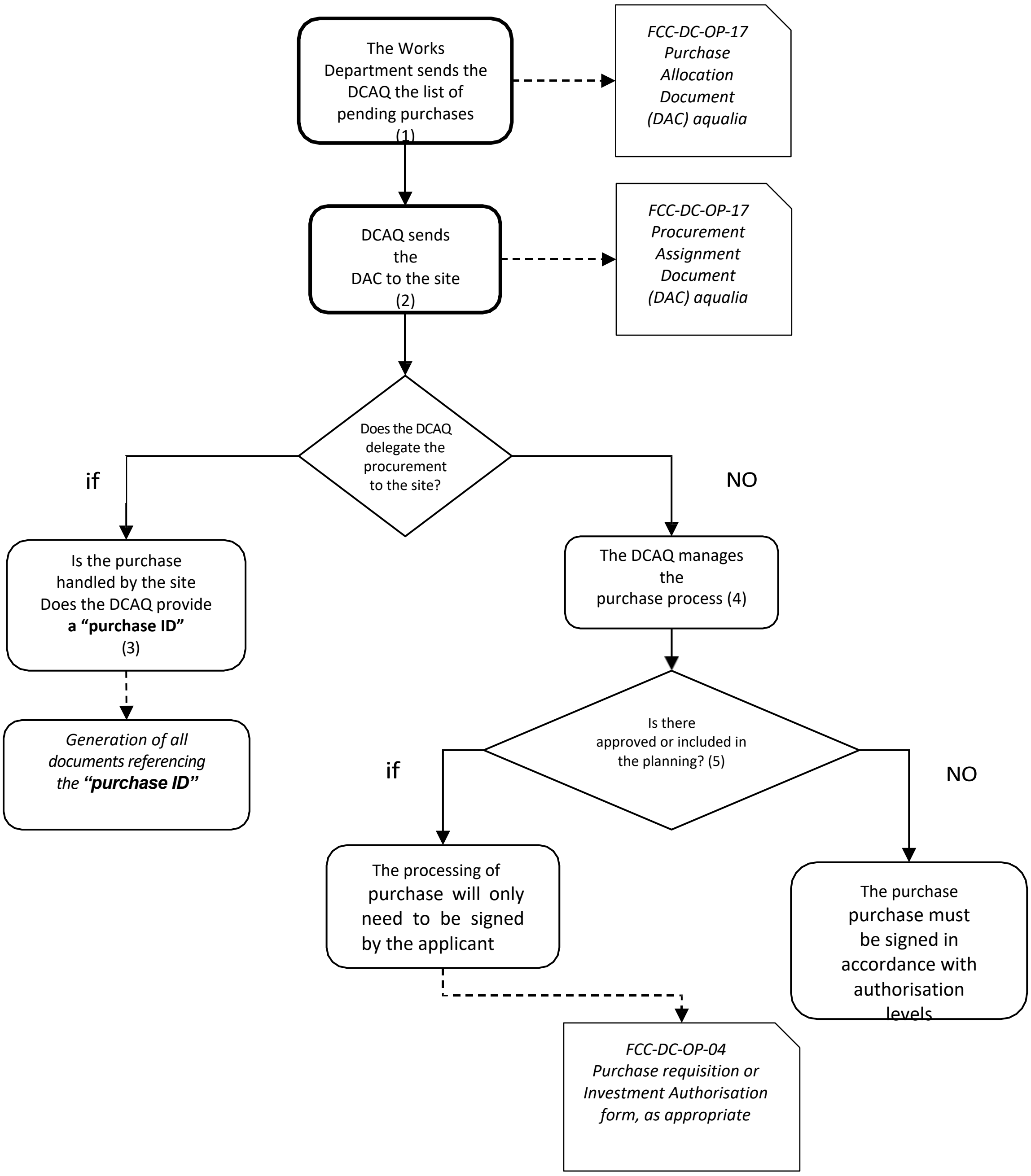
Procurement Requirement: products or services that must be negotiated and procured by FCC Aqualia and its subsidiaries for the performance of their activities.

DAC: Procurement Assignment Document. A document **owned by the DCAQ** that identifies those responsible for managing Procurement Requirements. It is a 'living' document that may evolve in line with the Project or the Company's operating conditions.

Procurement Management: a professional activity which, in general terms, focuses on efficiently obtaining and securing the necessary resources to help fulfil the Organisation's mission. This activity begins with the definition of the Requirement and ends once the goods or services have been delivered in full, in strict compliance with all necessary requirements regarding deadlines, price and quality.

4. Flowchart associated with this Procedure

The various decisions and communications that must be made are outlined below. The subsequent sections of this procedure detail how and when they take place.



5. Notification of purchases

(1) At the start of the Project (within a maximum of 30 days after the contract is signed), the DCAQ will be contacted in order to identify which products and services will be procured directly by the Project and which by the DCAQ; depending on the nature of the Project, any necessary follow-up and reallocation meetings will be held.

To this end, the completed *FCC-DC-OP-17_Procurement Allocation Document (DAC)* form must be sent for each ongoing project to the procurement mailbox**comprasAQ@fcc.es** , listing all pending purchases therein. This document must include **all purchases for the construction project or project**, which may or may not subsequently be delegated by the DCAQ or by the FCC Central Services Procurement Department, as indicated below, including those for electromechanical equipment, civil works, indirect costs, general services, etc.

6. Types of Procurement

There are two types of procurement:

A) **Central Services Procurements**: those products or services that are directly or indirectly managed by Central Services (Finance; Communication, Brand and Public Affairs; People and Culture; Compliance; Customer Management; Information Systems and Technologies; Strategic Development and Research; Sustainability and Innovation; Operations and Technology; Legal Advice; and Procurement), regardless of the type of goods or services involved. Procurement requirements of this type shall be directed to the DCAQ. The DCAQ shall refer these procurement requirements to the FCC Central Services Procurement Department for management, in order to take advantage of the FCC Group's synergies and contracting terms, as specified in document FCC-NC-03_Scope of application and communication of procurement requirements in the FCC Group Central Services.

B) **Production purchases**: products or services related to the production/execution of the Project. These purchases will be managed **by the Project or by the DCAQ**, as determined by the DAC.

7. Production purchases

(2) The DCAQ will determine, based on the amount, volume, synergies, etc., which purchases will be managed by the DCAQ and which will be managed directly by the Project.

The DAC's allocations may be:

a) **DCAQ**: The purchase will be managed by the DCAQ (4).
b) **PROJECT**: The purchase will be managed by the Project and assigned a "Purchase ID" (3).
The DCAQ will be involved in the management of all procurements delegated to International above €50,000, analysing the bids collected by local procurement managers and approving the award proposal.
c) **TO BE DEFINED**: This will be assigned "a" or "b" when it is necessary to initiate the procurement process.

(3) On the basis of the above, the DCAQ will send the DAC with a "Purchase ID" for those purchases to be managed directly by the project. The "Procurement ID" will be a unique identifier for the process. Contracts/orders must comply with the agreements reached with the supplier. To ensure the correct identification of procurements and the traceability of the procurement process, the Procurement ID must be correctly stated on all orders (in the case of orders managed on the SAP platform, in the "Additional Data" tab, "Procurement No." field)

Communication of the "Purchase ID" by the DCAQ will authorise the start of the procurement process. No procurement process shall be initiated nor shall any commitment to a future purchase be made without the aforementioned code.

Any purchases that are PENDING DEFINITION **must be reported to the DCAQ** before

any negotiations commence. At that point, the DCAQ will make the final decision as to whether the purchase is to be managed by the project, in which case, as stated above, **the** associated **"Purchase** ID" will be provided, or whether the purchase is to be managed by the DCAQ.
All delegated purchases must be managed in accordance with the principles set out in section 50 of the General Standards Manual and must be duly formalised and documented. Those exceeding 3,000 euros must have at least three bids from different suppliers that meet the required conditions and are comparable, with the contract being awarded to the most economical bid. If it is not possible to obtain this minimum number of bids, this situation must be recorded in the procurement file and a written justification from the unit seeking the contract will be required, signed by the Director of the Delegation, the Head of Department or an equivalent figure. The bids, or the justification for their absence, must be stored in a traceable and auditable repository. All other documentation relating to these procurement processes shall be held by the User Unit and shall be available at all times to the DCAQ and to those responsible for procurement functions.

8. Purchases managed by the DCAQ

(4) Purchases to be managed by the DCAQ must be notified by the user before any negotiations commence. Information regarding the need for the purchase must be sent to the DCAQ sufficiently in advance, from the moment the potential need for a good or service is identified, or at least 30 working days prior to the award deadline, in order to ensure compliance with the delivery deadlines for materials or services required by the Project. Where this is not complied with, the Procurement Department cannot guarantee that deadlines will be met. The notification of the procurement requirement to the DCAQ shall be made by the relevant regional procurement manager or, in the absence of such a manager, by the site manager, management unit head or a superior, using the standard form *FCC-DC-OP-04_Procurement Requirement Form,* via the channels indicated by the DCAQ, attaching the necessary additional documentation. This notification shall contain the following information:

- **Description of the Purchase Requirement**: a brief description of what needs to be purchased.
- **Company / Division requiring the purchase**.
- **Estimated amount**.
- **Included in approved planning/budget (yes/no)**
- **% of Aqualia's shareholding (in the case of a joint venture or associated company)**
- **Scope (national/international)**
- **Division / CECO**: division or cost centre to which the expenditure is expected to be allocated.
- **Start date of the requirement**.
- Contract duration (if applicable)
- **Documentation describing the requirement**, including any documents that may be useful to the purchaser in preparing the request for tenders, depending on the type of goods or service to be contracted:
    - Detailed description.
    - Technical description sheets (technical specifications, applicable regulations and tests that must be included in the contract).
    - Required service/support levels.
    - Plans, measurements or number of units.
    - Work or delivery schedules.
    - Delivery terms.
    - Regulations or certifications to be complied with.
    - Tests, inspections and trials to be carried out.
    - Documentation to be provided by the supplier.
    - Suggested suppliers.
    - Any other relevant documents; study proposals, etc.
    - Other factors.

(5) If the purchase is included in the current project plan, it will suffice for the applicant (the site manager, management unit or higher-level manager) to sign the standard form *FCC-DC-OP-04_Purchase Requirement Procedure*, attaching the necessary additional documentation. If it is not, express approval will be required, for which the necessary approval signatures must be provided, following the workflows and authorisation levels indicated in Annex 1, which are more restrictive than those set out in document "FCC-NI-01".

If the purchase relates to an authorised investment, the "Investment Authorisation" form with the relevant signatures may be sent to the DCAQ instead of the FCC-DC-OP-04_Purchase Requirement Form.

In cases where the outcome of the procurement process results in a cost higher than the approved estimated amount, that amount must be updated and re-approved.

The DCAQ will manage the purchase in accordance with the regulations and procedures of the FCC Group's Procurement Department. This system is certified under the UNE-CWA 15896 standard "Value-added procurement management".

The DCAQ will assign a "Purchase ID" code to each purchase it manages. This code will be a unique identifier for the process. Contracts/purchase orders must comply with the agreements made with the supplier to ensure the traceability of the procurement process. In SAP, the assigned ID code must be entered in the header text, in the title field before any other text, and within the "Additional Data" tab, in the "Purchase No." field.

9. Use of solutions incorporating Artificial Intelligence (AI)

In those procurement processes that include the supply, development or use of solutions based wholly or partly on Artificial Intelligence, it will be mandatory to carry out an Artificial Intelligence Risk Assessment (RIA) prior to the award of the contract.

For this risk assessment and in accordance with *the FCC Group's AI Governance Model, the requesting user or managing unit must provide the AI Form to the supplier(s) of the product or service being tendered for the specific procurement. Once completed, the form must be sent to*IA@aqualia.com .

The contract award to the supplier cannot be formalised until the RIA assessment has been carried out and validated in accordance with the criteria established by the organisation

Digitally signed by Alberto Andérez Ibáñez
Date: 20 May 2026 17:27:44 +02:00

Signed: Mr Alberto Andérez Ibáñez
Purchasing Director, Aqualia

Digitally signed by TORROJA RIBERA JOSE MARIA - 00816864L
Date: 21 May 2026 17:33:38 +02'00'

Signed: Mr José María Torroja Ribera
Purchasing Director, FCC

Digitally signed by Santiago Lafuente Pérez-Lucas
Distinguished Name (DN): cn=Santiago Lafuente Pérez-Lucas, email=slafuentep@fcc.es, c=ES
Date: 22 May 2026 07:36:04 +02'00'

Signed: Mr Santiago Lafuente Pérez-Lucas
CEO, Aqualia

APPENDIX 1: Authorisation Level Tables

FCC AQUALIA CENTRAL SERVICES	
POSITION	AMOUNT (upper threshold of the level)
Head of Department	€5,000
Line manager	€25,000
CEO	No limit

FCC AQUALIA NATIONAL	
POSITION	AMOUNT (threshold of the level)
Head of Department/Site Manager	€1,000
Head of Management Unit/Head of Department	€5,000
Head of Department	€25,000
Regional Director	€50,000
Area Manager	€1,000,000
Director, Spain	€5,000,000
CEO	No limit

FCC AQUALIA INTERNATIONAL	
POSITION	AMOUNT (upper threshold of the level)
Head of Department/Site Manager	€1,000
Project Manager/Head of Management Unit/Department Director	€25,000
Country Manager	€250,000
Regional Manager	€1,000,000
Area Manager	€5,000,000
CEO	No limit

*At the first levels of authorisation, there will always be two approvers, as Administrative Managers approve all documents in the system.