

The OHLA Group has ratified its commitment to zero tolerance with respect to any prohibited or potentially criminal conduct.

All OHLA employees, without exception, and members of all Boards of Directors, must fully comply with the provisions of this Policy, the Code of Ethics, the Anticorruption Policy and all other applicable rules of the Crime Prevention System, as well as applicable criminal laws. Compliance with such regulations is an indispensable condition to maintaining an employment relationship or partnership with the OHLA Group, and no violations will be tolerated. Any event of breach will be investigated and may result in the ordering of applicable legal and disciplinary measures.

The OHLA Group, in its business relations with other companies or professionals, will establish as a priority in its selection process that such third parties have existing Codes of Ethics and Crime Prevention Policies in place that contain conduct and management principles that are similar to the Group's.

The OHLA Group analyzes the offences described in the Spanish Criminal Code and identifies the circumstances in which they may be committed, analyzing its relationship with Group members, markets, the community and public officers, as well as its commitment to society and patronage.

The conduct guidelines expected of its staff are described in the Code of Ethics based on three basic behavioral principles:

- Strict abidance by current laws, and compliance with the Group's internal regulations.
- Integrity and ethics, by exercising one's profession with objectivity, professionalism and honesty.
- Respect for Human Rights and Public Freedoms, included in the Universal Declaration of Human Rights of the United Nations.

The Compliance Department is in charge of ensuring compliance with this Policy. Consequently, given its supervisory task, it is vested with authority, independence and impartiality, allowing it to act at its own initiative and fully independently from the rest of the organization, without affecting what is foreseen as its mandate and supervision by the Auditing & Compliance Committee.

The OHLA Group commits to periodically arranging informative courses on this Policy. Furthermore, periodic and confidential audits will be completed, seeking to a) prevent and detect violations of the Group's Crime Prevention System, b) reduce the risk of committing criminal conduct and other irregularities, c) identify any changes and updates contributing to the Crime Prevention System's development and continuous improvement.

The Group's entire staff is obligated to report any fact, act, conduct or behavior that is contrary to this Policy, through the Ethical Channel, available at:

Intranet: [OHLA-Link.com/ Ethics Reporting Channel](http://OHLA-Link.com/Ethics-Reporting-Channel)

[www.ohla-group.com/ Ethics and Integrity/ Ethics Reporting Channel](http://www.ohla-group.com/Ethics-and-Integrity/Ethics-Reporting-Channel)

Ethical Channel of the OHLA Group – Compliance Management. Pº de la Castellana, 259D Torre Espacio. 28046 Madrid, Spain

OHLA Group’s Auditing & Compliance Committee will ensure that an exhaustive analysis is completed of any potential infringements, always guaranteeing confidentiality and the absence of any retaliation.

Any questions, suggestions or recommendations regarding this Policy must be notified to the Group’s Compliance Department.

The original document approved by the Board of Directors of Obrascón Huarte Lain is the Spanish version. In the event of an inconsistency between this translation and the original Spanish document, the Spanish version will always prevail.

Approved by OHLA Group’s Board of Directors at its meeting held on 13 November 2019.

