

human rights

Commitment

- Respect, protection and promotion of Human Rights.

Lines of Action

- Improve working conditions to ensure equal opportunities and non-discrimination among employees.
- Ensure that its companies are not complicit in the violation of Human Rights (Global Compact).

2012 Milestones

- Continued with the Code of Ethics course for all structural personnel in Spain.
- Participated in forums and dialogs on the implementation of Human Rights in the company.

2013 Goals

- Formalize the Human Rights policy.
- Follow up the recommendations of the Ruggie Report on Human Rights in Spanish companies.

Ferrovial's Code of Ethics states that "All actions undertaken by the company and its employees shall scrupulously respect the Human Rights and Civil Liberties enshrined in the Universal Declaration of Human Rights." The Whistleblowing Channel allows any employee to report cases of inappropriate conduct or violations of the Code. In 2010 Ferrovial launched the Complaints Box on its corporate portal to allow any individual with Internet access to report and document possible irregularities or behavior that is against the law or the ethical commitments established by Ferrovial.

As a signatory to the United Nations Global Compact, Ferrovial is committed to supporting and respecting the protection of fundamental, internationally recognized Human Rights and ensuring that its companies are not complicit in their violation. This commitment also includes the basic labor rights and principles set out in the Declaration of the International Labor Organization (ILO): freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation.

Supply Chain

Ferrovial is also committed to respecting and promoting Human Rights across the supply chain. The company promotes the creation of new models of supplier orders and contracts that give greater weight to aspects of Corporate Responsibility.

An analysis of the profile of suppliers, products and countries of origin carried out by the different company businesses does not reveal significant changes with respect to previous years. Most of Ferrovial's investments are in OECD countries or in upper-middle or high-income countries according to the World Bank classification. Their legislation recognizes and guarantees respect for Human Rights, which is why the risk of Ferrovial's supply chain has been rated as low.

Since 2008, the Construction division has had a specific Corporate Responsibility clause in its supplier-partner agreements. These agreements are made with major suppliers. In 2012, Services included the clause in its contracts, in order to extend Ferrovial's commitment to Corporate Responsibility to its supply chain. Ferrovial has informed its suppliers of its adherence to Global Compact Principles, presented them with a copy of those principles and urged them to take them into account in their operations.

Finally, a new methodology to analyze high-risk suppliers has been implemented, based on the Global Compact Principles and FTSE4Good.

Risk management

The global corporate risk management system (FRM) covers the risks of Human Rights violations. The area of compliance risks includes risks due to insufficient or faulty procedures implemented to ensure compliance with the ethical principles that govern the company's relationship with its employees.

With regard to security staff training, the Security Duties and Procedures Manuals have been expanded with a section on Human Rights rules to be followed by employees, as well as new instructions in this area for the different security departments.

Ferrovial maintains its commitment to promote Human Rights under the Millennium Development Goals, specifically with respect to target 7C: "Halve, by 2015, the proportion of the population without sustainable access to safe drinking water and basic sanitation." Four projects dealing with this target were in operation in 2012 in Tanzania, Ethiopia, Colombia and Peru, in collaboration with the development NGOs ONGAWA, Intermón Oxfam, Ayuda en Acción and Plan España. These projects amount to total investment of almost one million euro, with some 50,000 beneficiaries and 15 volunteers.

Ferrovial prohibits any type of discrimination toward its customers and society in general, and undertakes to provide information on its operations in a fast, clear and secure way. Ferrovial is committed to complying with local legislation and to respecting the culture, customs and values of the people in the communities where the company operates. Ferrovial contributes to the promotion of human rights compliance, maintains an open dialog with its stakeholders and takes part in social activities with the community.

Labor unions and collective bargaining

Ferrovial recognizes the rights of its employees, in accordance with the Declaration on Fundamental Principles and Rights at Work established by the International Labor Organization, and is committed to non-discrimination, the promotion of equal opportunities and the furtherance of diversity, the prohibition of child and forced labor, freedom of association and the right to collective bargaining.

Labor relations between Ferrovial and its employees are based on compliance with the applicable legislation in each country, international conventions and other legal and regulatory provisions governing employment.

In every country where it operates, Ferrovial guarantees workers' rights such as the right to strike, freedom of association and the right to collective bargaining by appointed workers' representatives and labor unions. Collective bargaining agreements currently govern the working conditions of 79% of employees.

Equality and non-discrimination

Through this commitment, included in its Code of Business Ethics, Ferrovial supports diversity as a business, social and legal principle, and complies with current legislation regarding equal opportunity.

As well as signing the Diversity Charter, Ferrovial has sponsored the second cycle of forums organized by the Diversity Foundation, called the Diversity Management Toolkit. The aim is to help generate a culture of non-discrimination and create a series of specific diversity management tools through four seminars with a practical and participative approach. The series comprised four forums in 2011 and 2012 with the aim of becoming a benchmark initiative for the analysis of effective and efficient people management models.

The Code of Business Ethics states that all employees shall be given equal opportunity to advance their professional careers on the basis of merit. This commitment has been recognized by Ferrovial S.A. receiving the Equality Award for Companies, valid until 2013. In 2012, the company was also awarded the "Empresa más Igual" (Most equal company) seal by the regional government of Madrid, for its promotion and implementation of equal opportunity

initiatives, specifically its "IGUALA +" Plan.

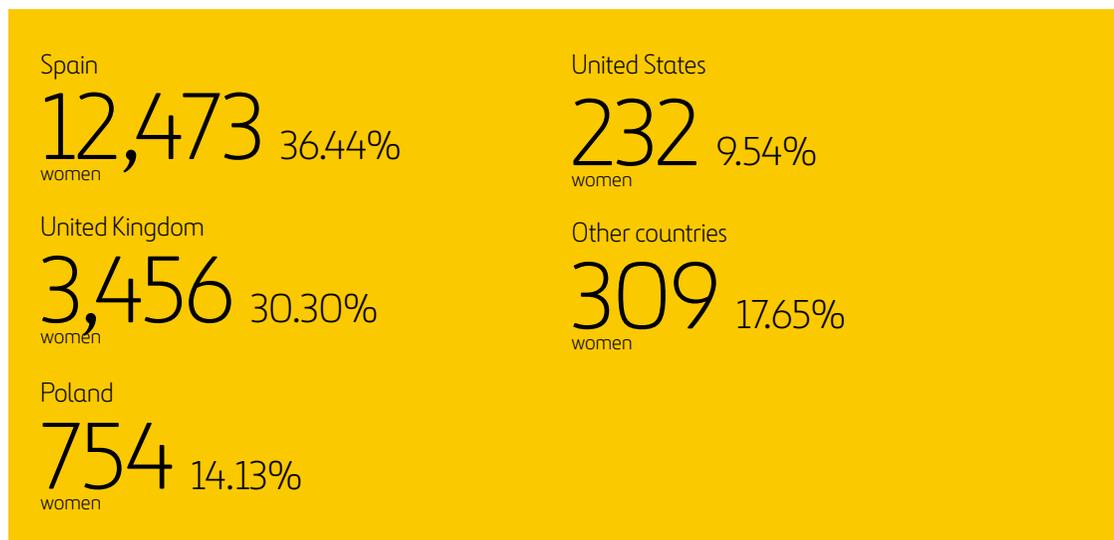
The proportion of women in Ferrovial is 31%. Within each division, the numbers are as follows: 36% in Services, 32% in Toll Roads, 13% in Construction, 36% in Airports, 62% in Real Estate and 42% in Corporate.

The proportion of women on Ferrovial's governing bodies, i.e. the Board of Directors and management committees, and the management committees and corporate departments in the group's divisions and subsidiaries, amounts to 13%.

By professional category, women account for 13% of the total number of company executives, 25% of graduates (3- or 5-year degrees), 70% of clerical workers and 30% of manual workers and line personnel.

36% of the total number of women work part-time. In the countries in which Ferrovial has a significant presence, the number of women working in the company is as follows:

The Equality Plan includes 17 measures that have been implemented on a step-by-step basis since it was approved. One of them is the Work/Life Balance Plan, which includes measures such as the extension of maternity leave by two weeks, flexible reduced working hours in case of guardianship responsibilities when the person in question is caring for a child under 10, and special leave that adapts to employee needs.



Commitment to disadvantaged groups

The company's commitment to equal opportunities has led it to conclude a number of agreements that enable the integration of people with disabilities who are at risk of social exclusion.

Since 2006, the company has worked alongside Adecco Foundation in the launch of social responsibility initiatives involving hiring people with disabilities, and other initiatives that raise awareness and make a social contribution.

Of particular note here is the Familia Plan for Ferrovial employees. It aims to improve the quality of life and facilitate the social integration and employment of family members with disabilities.

Other results of the collaboration with Adecco Foundation are social integration initiatives for people with disabilities, such as Sailing Schools to practice adapted sports.

Through the Integra Foundation, the company organized a photography exhibition involving major photographers as part of its work to raise awareness of the need for employment inclusion. The exhibition showed portraits of executives and employees from different companies, side by side with photos of people at risk of social exclusion who have been integrated into the companies' workforce. The aim was to show that, if given the chance, people who have suffered or suffer social exclusion can become part of the labor market, and are impossible to distinguish from any other workers. The partnership with this foundation has so far led to the integration of 167 people at risk of social exclusion. A number of different training initiatives have also been started up in the area of services.

Workplace harassment

Since 2008, Ferrovial has published on its intranet a corporate Procedure for the Prevention of Workplace Bullying, Sexual Harassment and/or Gender-based Harassment. It is now in force throughout Spain. A Whistleblowing Channel was implemented in 2010 and is available to all Ferrovial's stakeholders, both internal and external.

The approach was based on the third article of the Code of Ethics, which calls for respect for the law, ethical integrity and Human Rights. It also draws on the contents of Organic Law 3/2007, passed by the Spanish government on March 22, 2007 to guarantee effective equality between men and women, and to protect employees from potential situations of gender-based harassment in the workplace.

This procedure, drafted in accordance with the recommendations of the European Framework Agreement on harassment and violence at work of April 26, 2007, guarantees the right to the utmost privacy and confidentiality in the handling of all such matters, including the identity of the persons involved.

In 2012, 16% of complaints for alleged harassment were made via the Complaints Box. For each of these, the company carried out the process established by the procedure. It conducted an exhaustive analysis of the situation to check the facts as claimed while respecting the confidentiality and privacy of the parties involved.

Child and forced labor

Ferrovial's Code of Ethics expresses its commitment to refrain from the use of child labor and to exclude any goods or services produced by child labor from its business activities, as well as to ensure compliance with the provisions of the International Labor Organization (ILO) in relation to child labor. Ferrovial demands strict observance of this principle from all of its employees and suppliers.

There is currently very little risk of violating this commitment, since most of its investments are in OECD countries, which already have a legal framework for the protection of labor rights.

Most of Ferrovial's suppliers also operate in OECD countries and are therefore considered low-risk as regards Human Rights violations. All purchasing and subcontracting involve an acceptance of agreements requiring compliance with current law on environmental and labor matters. Framework agreements also include a clause requiring commitment to the Global Compact principles and collaboration on social action projects.

Suppliers who operate outside the OECD are bound by Human Rights legislation. To ensure compliance, suppliers are periodically asked to provide documents proving compliance.

According to the latest evaluation, internal procedures protect against risks of Human Rights violation in environmental and health and safety matters, which are the key aspects with respect to current business risks.

Training and awareness

As an international company, employer and service contractor, Ferrovial is aware of its capacity to influence many people and organizations. The company has therefore undertaken to raise awareness and respect for Human Rights, and promote good practices within its areas of influence.

Thus, all Code of Ethics courses taught at executive and management levels include a module on human rights. An online training course was introduced in 2010 on the Code of Ethics. Since then, 4,592 training hours were given on the subject to 4,465 employees.

Ferrovial takes advantage of its participation in international forums and training programs to raise awareness of the need for business involvement in the protection of Human Rights. Proof of this was the appointment of Ferrovial in 2012 as Secretary of the Executive Committee of Forética.

Corporate Volunteering

Ferrovial promotes corporate volunteering as a way of raising awareness and providing training in the area of Human Rights. In 2012, 1,079 employees were involved in social initiatives during their workday.

Involvement by employees in social projects promotes respect for Human Rights, generates information about the problems that lead to their violation and raises awareness of the importance of citizen participation to resolve these problems.

Ferrovial is actively involved through its volunteers in the fight to protect Human Rights, and thus contributes toward the achievement of Millennium Development Goal number 8: develop a global partnership for development.

The company has various ways of channeling its employees' charitable interests and promoting the culture of solidarity:

- **Volunteering for Development.** Ferrovial supports and funds development cooperation through the work of its employees. So far, 54 of the company's employees have traveled to countries in the South to provide their know-how in basic infrastructure access projects. International volunteering is specialized and professional. Currently volunteers are working through the Social Infrastructure Program (see the chapter on Community Investment).
In 2012, 11 Ferrovial employees traveled to Peru and Tanzania for 15 days to work on water and sanitation projects being carried out by the NGOs Plan España (Peru) and ONGAWA (Tanzania). The volunteers were chosen from more than 50 candidates according to the needs identified by those responsible for the projects. All participants received training in cooperation and worked on the design, technical advice and monitoring of the infrastructure construction work for water and sanitation. They also analyzed the quality of water and helped train local technicians.
- **Volunteers at the 2012 London Olympic and Paralympic Games:** Ferrovial launched an initiative together with HAH for 50 family members of employees to participate as volunteers welcoming arrivals at Heathrow Airport for the 2012 London Olympics. The volunteers took part in a variety of actions to assist athletes, authorities and spectators arriving at the airport.