



GLOBALVIA®

**GLOBALVIA
UN Global Compact
Communication On Progress**

*Madrid
April, 2014*

Our Vision: Being an exemplary company with a business model based on sustainability, responsible investment, transparency and continuous engagement with the stakeholders.



GLOBALVIA



I am pleased to confirm that GLOBALVIA INVERSIONES S.A.U. continue supporting the Ten Principles of the UN Global Compact with respect to human rights, labor, environment and anti-corruption. During this two years we have progressed in the implementation of those principles within our activities. We are committed to make the UN Global Compact and its principles part of the strategy, culture and day – to – day operations of our company, and we are engaging in collaborative projects which advance the broader development goals of the United Nations.

GLOBALVIA INVERSIONES S.A.U. proudly shows this commitment to our stakeholders and the general public.

The annual submission of a Communication on Progress (COP) is the culmination of our efforts to implement the Ten Principles in a Company established in seven countries. We support public accountability and transparency, and therefore commit to report on progress annually according to the Global Compact COP policy.

Sincerely yours,

Javier Pérez Fortea
CEO



This is our second submission of a Communication On Progress. It reflects the enthusiasm and effort invested by the people of GLOBALVIA to move our business a step further. A step to promote social responsibility in our daily operations: in our Highways, Railways, Ports and Hospitals. In these pages a summary of our actions is exposed as a reflection of our spirit.

Sincerely yours,

Fernando Vallejo Lázaro
Organization and CSR Director

CONTENTS	
I. Introduction	02
II. Résumé	06
III. Human rights principles	11
III.1 Human rights assessment, policy and goals	12
III.2 Implementation of human rights actions	16
III.3 Measurement of human rights outcomes	21
IV. Labor principles	22
IV.1 Labor assessment, policy and goals	23
IV.2 Implementation of labor actions	27
IV.3 Measurement of labor outcomes	33
V. Environmental principles	37
V.1 Environmental assessment, policy and goals	38
V.2 Implementation of environmental actions	40
V.3 Measurement of environmental outcomes	47
VI. Anti-corruption principles	50
VI.1 Anti-corruption assessment, policy and goals	51
VI.2 Implementation of anti-corruption actions	53
VI.4 Measurement of anti-corruption outcomes	54
VII. Conclusions	55

An overall of 63 assessments, actions and indicators that measure their outcomes have been developed in Globalvia that confirm the strategy and operations alignment with UN Global Compact ten principles in four different dimensions.

Human rights

“Businesses should support and respect the protection of the internationally proclaimed human rights; and make sure that they are not complicit in human rights abuses.”

Assessment, policy and goals:

- Code of Ethics
- Corporate Governance policy and principles
- Specific goals for the upcoming years: Internal Audit and Risk Control Committee, and collaboration with Foundations

Implemented actions:

- Application of the Code of Ethics
- Communication of both Code of Ethics and Corporate Governance policy and principles
- “Coming in” training
- Collaboration with Fundación Carmen Pardo Valcarce: labor integration
- Habaneras music spectacle
- Son Espases University Hospital: collaboration in social projects
- School Volunteering and delivery of didactic material
- “Contigo, 1=2” Project
- Collaboration for training of disabled people: CAMPVS

Measurement of outcomes:

- Harassment report
- Code of Ethics training

Globalvia presents assessments, policies, goals, implemented actions and its measurements, related to human rights, labor, environment and anti-corruption

Labor

“Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced and compulsory labor; the effective abolition of child labor and; the elimination of discrimination in respect of employment and occupation.”

Assessment, policy and goals:

- Moral – Protocol annex to the Code of Ethics
- Labor Risk Prevention policy
- Appraisal process
- Training and development plan

Implemented actions:

- Moral – Protocol annex to the Code of Ethics implementation
- Communication of Labor Risk Prevention policy
- Social benefits for employees
- Talent Management Review
- Photo contest 2013
- Sport promotion within the Company.
- Children sport promotion
- Membership in economic association

Measurement of outcomes:

- Employees distribution by gender and hierarchal level
- Accidents, absenteeism and illness records
- Internal quality of service survey

Environment

“Businesses should support a precautionary approach to environmental challenges; undertake initiatives to promote greater environmental responsibility; and encourage the development and diffusion of environmentally friendly technologies.”

Assessment, policy and goals:

- ISO certifications 9001 and 14001
- CSR strategic plan (and specific on Concessions)
- Environmental Impact Declaration

Implemented actions:

- Collaboration agreement with Abadía de Montserrat Foundation
- Training on ISO certifications
- CSR strategic plan (and specific to Concessions) implementation
- Túnel de Sóller archeological site
- Underwater photography contest
- User awareness in waste management
- Creating the Universal Path Carara
- Son Espasses University Hospital: Energy Efficiency Plan
- 360° Infrastructure Awards
- “Movimiento ECO”, companies against fire
- Sustainable mobility

Measurement of outcomes:

- Corporate
- Ruta de los Pantanos
- Concesiones de Madrid
- Túnel d’Envalira
- Autopista Central Gallega
- Túnel de Sóller
- Sociedad Concesionaria del Itata
- Sociedad Concesionaria del Aconcagua
- Chile Country Office
- Ruta 27
- Tranvía de Parla
- M50 Concession Limited
- Hospital del Sureste
- Autopista Nuevo Necaxa-Tihuatlán

Anti-corruption

“Businesses should work against corruption in all its forms, including extortion and bribery.”

Assessment, policy and goals:

- Fraud procedure
- Compliance Manual

Implemented actions:

- Compliance Committee
- Code of Ethics: tutorial video

Measurement of outcomes:

- Public legal cases statement
- Internal Audits carried out and its actions

III. HUMAN RIGHTS PRINCIPLES

III.1 Human rights assessment, policy and goals

“Businesses should support and respect the protection of the internationally proclaimed human rights...”

Globalvia supports the three principles related to human rights by the definition of certain actions, codes and manuals:

- 1 Code of Ethics
- 2 Corporate Governance policy and principles
- 3 Collaboration with Foundations

“...and make sure that they are not complicit in human rights abuses assessment, policy and goals.”

1 Code of Ethics

Globalvia has designed the **Code of Ethics** as a guide for all employees and executives of the Company to perform their professional tasks. This code is related to their daily working lives, as well as to the resources used and the business environment they work in. According to this, Globalvia respects and adheres to the human and employment rights that are recognized under Spanish and international legislation and the principles behind the World Compact, the UN standards on the responsibilities of transnational and other organizations in the field of human rights, the OCDE guidelines for multinationals, the tripartite declaration of principles on multinationals, and the social policy of the International Labor Organization, respecting the laws of each country and the ethical principles of their respective cultures.

This Code includes the following paragraphs:

- **Declaration of principles**, stating that the compliance with the Code of Ethics is mandatory for all employees of Globalvia and its subsidiaries
- **Values of the Globalvia**, as part of the Organization’s culture in means of i) integrity (as acting ethically and responsibly), ii) team work (as in collaboration, cooperation and communication), iii) quality management (in regard to constant ongoing learning; clear, precise and rigorous action procedures; and last but not least, respect for the environment), iv) results-driven (as in organization and efficiency), v) customer service, and finally, vi) innovation, imagination and anticipation.
- **Professional Standards and Conduct**, which states that the compliance to the Code of Ethics is compulsory for all Globalvia personnel and an inherent obligation as they fulfill their mission. All employees therefore accept specifically and irrevocably that any failure to observe or infringement of this Code of Ethics may be considered as a serious

Globalvia respects and adheres to the human employment rights that are recognized under Spanish and international legislation

III. HUMAN RIGHTS PRINCIPLES

III.1 Human rights assessment, policy and goals

breach of their contractual conditions and Globalvia may apply any disciplinary measures as appropriate, without prejudice to any other civil or criminal proceedings that may ensue. The breach of this Code is not negotiable under any circumstances. Furthermore, guidelines for professional conduct may include:

- › Confidential information and professional secrecy
- › Concurrence and conflict of interests
- › Intellectual property, means and resources
- **Standards of conduct between Globalvia professionals**, as in general terms and more specific lines related to managers and executives
 - › Always encouraging relations driven by mutual respect and avoiding any kind of discrimination or other actions that may conflict with the Organization's values and ethics
 - › Any conduct that limits any professionals' dignity, whether physically or verbally, creating an intimidating, hostile or humiliating working atmosphere will be considered unacceptable
 - › Any conduct considered inappropriate will be reported to Human Resources for its study

Globalvia establishes the basis for development of their activities following the criteria of transparency and confidentiality in their relationship with the stakeholders involved in its business

② Corporate Governance policy and principles

Corporate Governance policy represents a guide to all Globalvia's employees and executives in the performance of their professional duties and in their daily work, as well as in relation to the resources used and the business environment in which it operates; it is also, an example of its commitment to transparency.

This policy includes the following issues:

- **General principles**, since the Company operates in OECD countries, its governance principles are based on the foundations laid in this organism and it nourishes from the Spanish Corporate Governance Code due to its shareholders nature. It includes the following principles that need to be followed by every employee:
 - › Rights and fair treatment of shareholders
 - › Interests of other actors, stating that the Organization takes its responsibilities with other non-stakeholders (legal, contractual, social and market) that may be related to its activity (employees, investors, creditors, suppliers, local communities, customers and government)
 - › Role and responsibilities of the Board

III. HUMAN RIGHTS PRINCIPLES

III.1 Human rights assessment, policy and goals

- › Integrity and ethical behavior
- › Communication and transparency
- **Corporate Governance**, stating General Counsel's functions and responsibilities, which are to keep updated the information related to ownership structure, direction structure, related operations and any other interesting information, as well as to make it available to shareholders.
- **Current Company's bylaws**
- **Operation of the Board of Directors, its composition and member and delegated bodies**, as expressed in articles 17 to 22 of the Company's bylaws
 - › Ways of organizing the Administration
 - › Nomination / Designation
 - › Term of office
 - › Powers of the Management Body
 - › Remuneration of the Management Body
 - › System and operation of the Board of Directors
 - › Board composition and its Delegated Bodies
- **Committees**, within the powers granted by the applicable law and the provisions of the Bylaws, the Board has delegated certain functions by creating committees. As of today, there are three committees: Executive Committee, Designation and Retribution Committee and Risk Committee.
- **Side agreements**, Globalvia's shareholders have entered into a Shareholders Agreement that governs the development of the Company.

3 Collaboration with Foundations

Last year Globalvia selected a Foundation in which to invest. After meeting with different sport foundation Globalvia decided that Real Madrid Foundation was the one that would better **enhance the social integration of children at risk of exclusion in Latin America**.



Socio-Sporting School (Costa Rica), run in partnership with Real Madrid Foundation

III. HUMAN RIGHTS PRINCIPLES

III.1 Human rights assessment, policy and goals



Socio-Sporting School (Costa Rica)

- Real Madrid Foundation main objective is to promote, both in Spain as well as abroad, the values inherent in sport, and the latter's role as an educational tool capable of **contributing to the comprehensive development of the personality of those who practice it**. In addition, as a means of social integration of those who find themselves suffering from any form of marginalization, as well as to **promote and disseminate all the cultural aspects linked to sport**.
- Globalvia is currently financing the project of attending 100 kids between 7 and 14. This project does not only focus on football but is also devoted to engage, inspire and educate other **kids about healthy habits in living**.

III. HUMAN RIGHTS PRINCIPLES

III.2 Implementation of human rights actions

This present chapter focuses on the description of concrete actions to implement human rights policies, address human rights risks and respond to human rights related concerns.

- ① Application of the Code of Ethics
- ② Communication of both Code of Ethics and Corporate Governance policy and principles
- ③ “Coming in” training
- ④ Collaboration with Fundación Carmen Pardo Valcarce: labor integration
- ⑤ Habaneras music spectacle
- ⑥ Son Espases University Hospital: collaboration in social projects
- ⑦ School Volunteering and delivery of didactic material
- ⑧ “Contigo, 1=2” Project
- ⑨ Collaboration for training of disabled people: CAMPVS

① Application of the Code of Ethics

In the chapter above, “III.1 human rights assessment, policy and goals”, Globalvia’s Code of Ethics has been described. At the end of that same document a specific paragraph is dedicated to the **application of the Code** and may be considered as its implementation.

According to this, the Code of Ethics is effective from the date of its approval by the Chairman, after which it was communicated to all employees and remains in force until it is cancelled or replaced by a new Code.

Thus, all employees will be under the obligation to be aware of, uphold and comply with this Code of Ethics. Any breach of the standards contained in this Code will be considered as an infringement and result in the corresponding disciplinary action being taken.

Managers requiring any other legal requirements for formal effectiveness must enforce due compliance.

If employees do not agree with the application of any of the principles and standards, they may set out their objections within 10 days of receiving it from HR. If no such communication is received, it will be understood to consent to the full content of this document. Globalvia has developed a Communication Plan taking into account the different realities existing in the Group societies in order to guarantee full understanding of the Code.

② Communication of both Code of Ethics and Corporate Governance policy and principles

The Code of Ethics is handed over to all employees along with their welcome pack on their first working day. Also, the Code of Ethics and the Corporate Governance policy and principles are available to everyone on the intranet.

The application of the Code of Ethics is a guarantee of ethical integrity for Globalvia and a reflection of the Company’s adherence to the human and employment rights

III. HUMAN RIGHTS PRINCIPLES

III.2 Implementation of human rights actions



Code of Ethics video screenshot

In 2013, Globalvia designed a tutorial video about the Company's Code of Ethics. It is a universal tool to get all employees involved emotionally in the importance of the Code of Ethics. The tutorial is oriented to spread the mission, vision, values of Globalvia to its employees.

The video is shown when the employee joins Globalvia allowing the learner to watch and learn at his own pace. After watching the video, the employee takes a test that will be retaken every three years to refresh its significance.

3 "Coming in" training

"Coming in" is a welcome training session given to all the employees that have recently join the Company and has a duration of two days.

The aim of the course is to present the Company, its mission, vision, values and culture. All business processes, quality management and environment processes, and support processes are also explained to all assistants.

4 Collaboration with Fundación Carmen Pardo Valcarce: labor integration

In keeping with its commitment to diversity, Globalvia collaborates with Fundación Carmen Pardo Valcarce in order to **promote and encourage integration** of people with disabilities. The company hired a person with intellectual disabilities for the General Services department, who gives support to the receptionist, attends phone calls, scans and copies documents.

From the CSR Department the challenge was to build awareness about people with disabilities in the workplace. We were determined to make all employees learn that people with disabilities can make a positive contribution to business at all levels. For that employee and leadership sensitivity training was a real asset. That is why it was decided that the Steering Committee would be in charge of sensitizing Globalvia's employees and teams to ensure the successful integration of this employee.

Along this year we have had to learn to build a strong communication with new employee by getting any challenges and issues into the open before they could become serious problems.

Globalvia supports integrating people with disabilities since it involves committing to the right of everyone to play an active role in society under conditions of fairness and equal opportunity.

III. HUMAN RIGHTS PRINCIPLES

III.2 Implementation of human rights actions

5 Habaneras music spectacle

Globalvia, in line with the **Right to participate in the Cultural Life of Community**, collaborated in the celebration of the fourth "Trobada de Havaneras" edition in Port of Sóller on the 13rd, 14th and 15th of September 2013.

6 Son Espases University Hospital: collaboration in social projects

During 2013, Son Espases University Hospital has worked in different social projects, such as:



- “Girasol” (Mental Healthcare Association): space provision for Girasol disabled employees.
- NGO “Ángeles sin Alas” (“Angels without Wings”, association for Pediatric Palliative Attention): publication of the Yearly Calendar and collaboration with their Christmas celebration.
- NGO “Na Marga Somriu”: refurbishment works to cater for children in Oncological Healthcare facilities.
- NGO “Cáritas”
- Patient Services Dpt. (Hospital Division): Non clinical collaborations for chronic patients, for their families and for people at risk of social exclusion (reformations, TV, children services, decoration project for Major Outpatient Surgery Unit and other special care cases).
- Big Superheroes Project: play-centre for long term pediatric patients. Currently under consideration by the Department of Education.
- Personal volunteer collaborations of employees with pediatric patients and other special patients: design and implementation of activities for children in the ICU.
- Support for Suppliers actions: disabled employees in coffeeshops, project for children with serious psychiatric diseases, bottled water supplier collaborates with NGO “Caritas”...

III. HUMAN RIGHTS PRINCIPLES

III.2 Implementation of human rights actions

7 School volunteering and delivery of didactic material

A team of employees of RUTA 27 was responsible for remodeling a classroom in San Pablo School (Costa Rica). Also, RUTA 27 donated a printer to this school and lights for a Christmas activity.

For the third year in a row, the Aconcagua Highway supported the children's school "Las Luciernagas" in Llay-Llay (Chile). During this time, a complete set of teaching material to be used throughout the year was delivered (for the classroom and educational support). The material focused on all areas related to educational development and road safety. Also, a roof was built in the school courtyard to protect the children from the extremely high temperatures experienced in that area.



Ruta 27 employees in San Pablo School



School "Las Luciernagas" (Chile).

8 “Contigo, 1=2” Project

The Organization & CSR Department encouraged employees to propose NGOs that they would like to support. The only requisite was to fill in a form in order to make sure that all the proposed NGOs followed basic and general requirements. The name of this project was “Contigo, 1=2” (“With You, 1=2”). A total of nine proposals were submitted to the Sustainability Committee which selected the three that best represented the goals of CSR Strategic Plan: Fundación Manolo Maestre Dávila, NGO Ongawa and Fundación Xaley.

Finally all employees chose the project Pozo del Tío Raimundo (“Amoverse”) of Fundación Manolo Maestre Dávila.



- Target: ensure school supports children with academic difficulties who come from dysfunctional families in Pozo del Tío Raimundo (Vallecas, Madrid).
- Benefits: Globalvia's contribution (financial and in the form of collaboration), greatly assists the progress of this project, resulting in immediate benefits for children from broken families and at risk of social exclusion, not only attaining a better life for them but also a brighter future.

Each employee had the option to make an economic contribution in 2013 and along 2014 and Globalvia contributed the same amount provided by all, thus doubling the donation (1 = 2).

III. HUMAN RIGHTS PRINCIPLES

III.2 Implementation of human rights actions

9 Collaboration for training of disabled people: CAMPVS

Fundación Carmen Pardo-Valcarce realized that integration of people with disabilities required for the disabled community to work to find solutions to break down existing barriers. Thus, FCPV has launched an innovative educational project following trends imported from the U.S. and UK to involve private enterprise in the world of higher education.



People with disabilities may not feel as if they are ready for the job because they do not have the practical, hands-on experience required for skilled positions or they do not have all abilities required. Many people with disabilities who are entering the workforce have not had the benefit of summer employment or part-time jobs as well as specialized training. As a result of this situation, companies cannot find in these people the adequate training for some positions. CAMPVS is just the answer to this issues.

Keeping in mind that hiring and supporting people with disabilities must be a successful endeavor for the business, an innovative training system was designed.

Three different and very specific training paths have been defined to give students just the right practical experience needed for a job posting. Along the way, companies will play a key role since employees of the different sponsor companies will teach subjects related this “careers”. Globalvia is already one of the Sponsors and has appointed two employees as mentors.



Training sessions (CAMPVS)

III.3 Measurements of human rights outcomes

Globalvia has various ways of monitoring and evaluating the performance related to human rights issues:

- 1 Harassment report
- 2 Code of Ethics training

1 Harassment reports

As the chapter related to Labor policies will detail, there is an external figure to whom any Globalvia’s employee has the right to report any harassment situation of any kind.

In 2013, **number of reports related to harassment of any kind were 2**, both of them in Costa Rica.

These reports followed the specific Protocol established in the annex to the Code of Ethics. As a result, the Investigation Committee determined that, in one case, had existed a situation of mobbing and sexual harassment and the perpetrator was fired; in the second case, it was determined that no harassment had occurred.

2 Code of Ethics training

All people hired by Globalvia receive a Code of Ethics. Moreover, there is a tutorial video for newcomers (see *III.2 Implementation of human rights actions*). To assess whether the matter has been understood, the person viewing the video must fill in a questionnaire on the topic.



Code of Ethics video screenshot

IV. LABOR PRINCIPLES

IV.1 Labor assessment, policy and goals

The following actions have been defined and implemented, these supports Labor principles:

- ① Moral – Protocol annex to the Code of Ethics
- ② Labor Risk Prevention policy
- ③ Appraisal process
- ④ Training and development plan

“Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining...”

① Moral - Protocol annex to the Code of Ethics

The Code of Ethics includes a specific paragraph that **describes the protocol for prevention and action in mobbing and / or sexual harassment in the workplace**. The Moral – Protocol states the compliance of the Company with the Spanish Constitution, European Union (EU) legislation and the Workers’ Statute and the Collective Bargaining Agreement for the Construction Sector, related to the safeguarding of dignity, the right to equality, moral integrity and non-discrimination.

It also defines the concepts that involves moral harassment:

- **Moral harassment or “mobbing”**, that may take three different forms, depending on who is doing the harassing:
 - › Descending: when the person doing the harassing is the victim’s hierarchical superior.
 - › Horizontal: When the person doing the harassing is on the same hierarchical level as the victim.
 - › Ascending: When the person doing the harassing is hierarchically below the victim.
- **Sexual harassment**
- **Gender-based harassment**

The protocol has been adapted for Costa Rica to comply with local legislation.

② Labor Risk Prevention Policy

In line with the policy framework on labor risk prevention, from Human Risks department of Globalvia, various activities take place related to this matter with the aim of improving working conditions and workers safety and health. To this end, the Company leans on the support and advice of a risk

The Moral - Protocol states the compliance of the Company with the Spanish Constitution, European Union (EU) legislation and the Workers’ Statute and the Collective Bargaining Agreement for the Construction Sector

IV.1 Labor assessment, policy and goals

prevention accredited service, with which various activities are developed aimed at the identification, evaluation and monitoring of risks condition arising from the Company's activity.

Globalvia's Direction, consistent with the guidelines established by the International Labor Organization and the Europe Union and also in compliance with internal regulations related to labor risks prevention, has developed a labor risk prevention management system that is fully integrated in the Company, at all hierarchal and functional levels, and that is consistent as well with the fundamental right workers health.

"...the elimination of all forms of forced and compulsory labor"

③ Appraisal process

Globalvia's employees are remunerated with a fixed annual salary and a **variable salary**. This last one is a part of the Integrated Management System framework applied by the Company's Human Resources.

The Board determines the strategy and overall objectives of the Company which will be applied in the variable salary. Globalvia's personnel, including those subsidiaries where the Company holds a majority stake are included within the Integrated Management System (IMS) Human Resources.

The variable salary is assigned to each of the managers to ensure that there is a complete alignment between the objectives assigned and the objectives and interests of Globalvia and its shareholders / investors.

The variable salary is composed of **three types of targets** with different weights depending on the degree of responsibility and job to do. There is also a fourth type that is not taken into account for the variable salary.

The types of objectives are called R1 (Results-1), R2, R3 and R4:

- **R1, Corporate objectives:** global Globalvia's objectives
 - › The entire organization has the same goals, with different weights.
 - › The aim is that everyone participates in the Group's development.

IV.1 Labor assessment, policy and goals

Globalvia's appraisal process ensures a complete alignment of the interests between people and the Company

- **R2, Team Goals:** specific goals of each team
 - › Business Direction: same goals that R1, but disaggregated to a specific scope: country or concession.
 - › Corporate Areas: specific objectives to provide the service and to generate tools to manage the Company and the business line.
- **R3, Employee Assessment of Competence:**
 - › Specific employee competencies that a person should show executing a particular job (Human Resources has established a set of 12 competencies, aligned with the strategy and objectives of Globalvia).
 - › As a result of this assessment an action plan is defined to be coordinated with the career plan (specific training, functional and geographical mobility, promotion opportunities, etc)
- **R4, Complete Employee Assessment of Competence:**
 - › In R4, every employee is evaluated in the 12 competencies based on a behavior survey

The weight assigned to each of the objectives sets out the degree of importance of each. With this system Globalvia ensures a complete alignment of interests between people and the company.

④ Training and development plan

Globalvia's **development plan** sets the attitudes, skills and expertise needed for an employee to take over the responsibility of the next hierarchical level in the organization.

Based on the analysis of the Company's main functions, Organizational Families are extracted (Finance, Support, Business Development, Highways and Railways). A development path for each family has been also defined and established that details the trail that each functional level needs to follow for their development.

IV.1 Labor assessment, policy and goals

Globalvia's development plan takes into account:

- › Skills assessment result
- › Performance evaluation
- › Individual assessment
- › TOEIC level (English level)
- › Training
- › Individual development needs

The **training policy** is included within the Company's development plan. The development modules provide four training blocks defined according to the Organization needs:

- **Corporate culture:**

- › It includes common training activities to all the employees, regardless of the area or department
- › The training aims to present the Company, and enhance the employees development within the Company (vision, mission, values, processes and systems)

- **Skills:**

- › This blocks gathers skill training activities common to all employees and graded by level / category
- › The aim is to train the employee for its development within the Organization

- **Technical competences:**

- › Specific training actions are included for each of the departments, areas, or professional levels
- › The objective is to develop the employee skills and enhance the development of their daily activities

- **Languages:**

- › Globalvia offers English classes to their employees
- › In societies where there is another language (different from English), the Society offers classes
- › It requires students commitment and follow-up

The training modules may be taken at certain points of the development paths, although there are mandatory actions that must be successfully completed in order to access the next functional level.

The training sessions take place at Globalvia's campus, a space where to develop the Company's talent.

IV.2 Implementation of labor actions

“...the effective abolition of child labor; and...”

The following paragraphs state the relevance of labor rights for Globalvia, through the implementation of various actions:

- ① Moral - Protocol annex to the Code of Ethics implementation
- ② Communication of Labor Risks Prevention Policy
- ③ Social benefits for employees
- ④ Talent Management Review
- ⑤ Photo contest 2013
- ⑥ Sport promotion within the Company
- ⑦ Children sport promotion
- ⑧ Membership in economic association

① Moral - Protocol annex to the Code of Ethics implementation

Related to the Moral-Protocol annex to the Code of Ethics, some measures to prevent harassment of any kind have been implemented within the Company:

- **Communication**, it is necessary to build awareness among the workforce and assure their effective knowledge not only of the definitions and different types of harassment but also of the action procedures set out in this protocol if harassment occurs.
- **Responsibility**, everyone at the Company is responsible for upholding the principle of not tolerating any conduct of this kind, if necessary by taking the disciplinary action provided under the applicable employment legislation. All personnel are also responsible for upholding the principle of co-responsibility in the monitoring of conduct in the workplace. This is especially applicable to supervisors and managers.
- **Training**, this topic is included in the Company's training programs for the whole workforce. The purpose of these programs will be to identify the factors that contribute towards creating a harassment-free working environment, fostering communication and proximity between supervisors and their teams at all the Organization's hierarchical levels.
- **Action procedure**, has been drawn up and is available to all employees for them to communicate complaints in guaranteed confidentiality and protection of the privacy and dignity of all people involved.
- **Compliance Officer**, an external figure that has been created as an expert in such procedures and whose mission is to channel any complaints and reports of harassment of any kind, working with the worker or, as the case may be, acting with the worker's authorization, to attempt to solve the conflict impartially. This Compliance Officer's details

IV.2 Implementation of labor actions

may be obtained by the affected worker from the HR Manager on request. The Compliance Officer, upon being made aware of a case, will write up a report of the complaint made by the worker, which the worker then signs, in order for the corresponding formal investigation to be launched. Consequently, the Compliance Officer will have sufficient powers to interview any member of the Company's personnel, regardless of their hierarchical level, to obtain the information necessary to resolve the conflict to the satisfaction of all parties, in confidence.

If no such solution can be found, the Compliance Officer will refer the case to HR, attaching all the information obtained during the investigation and submitting a report on the action taken with a view to reaching a solution. The Compliance Officer may propose setting up an ad hoc committee to monitor the harassment reported, made up of the following members:

- › A staff delegate and/or representative of the Company's trade-union committee, or, if the company has no union representation, any Company employee proposed by the employee who does not work in the same department as the alleged victim.
- › A representative of the Company — the HR Director or whoever the HR Director may delegate the task to.
- › The Compliance Officer who was involved in the first stage of the process.

This ad hoc committee, making use of the powers conferred under this protocol, will attempt to find an appropriate solution for the conflict in question. If the parties involved accept the proposed solution, they should explicitly say so in writing.

However, if after the procedure described the existence of moral, sexual or gender-based harassment is confirmed, the penalties considered appropriate in each case will be imposed.

• **Additional provisions**, to the Moral-Protocol annex to the Code of Ethics that include:

- › Precautionary measures: while the procedure is under way, Management will apply any precautionary measures necessary to put an immediate end to the situation of harassment, without negatively affecting the working conditions of the persons affected.
- › Assistance for the parties: During the processing of the action, the parties involved may be assisted by another person, who must undertake not to disclose any information obtained in consequence of holding this position of confidence.

IV.2 Implementation of labor actions

- › No reprisals: Any reprisals against complainants, witnesses, assistants or any other persons involved in good faith a harassment investigation are prohibited.
- › False complaints: if no harassment, in any of its modalities, is found to have taken place and the complainant is found to have acted in bad faith by falsely reporting improper conduct, the corresponding disciplinary action will be taken.

2 Communication of Labor Risks Prevention Policy

The above detailed policy related to Labor Risks Prevention is available to all employees in the Company's intranet, stating all the principles that everyone needs to know in order to ensure security and health in the daily work.

3 Social benefits for employees

Globalvia has different measures to control and improve the working environment related to health, safety and hygiene in the workplace.

- **Health insurance**, according to this, the Company subsidize up to 50% , extended to partners and children of the employee. By the voluntary adherence, the employees will have access to benefits such as dental coverage or up to 80% refund when assisting to non-subsidized medical centers and / or hospitals, provided they do not exceed a specific monetary amount.
- **Risk prevention and health surveillance**, the aforementioned agreement related to labor risk prevention offers every employee a yearly medical examination according to the protocol set out in the Company's prevention plan.
- **Accidents and professional diseases**, a Spanish Social Security collaborating institution manages and protects from accidents and professional diseases that may occur at the workplace and / or during working hours, by providing emergency medical assistance and also manages the transfer to hospital if needed.

IV.2 Implementation of labor actions

4 Talent Management Review

Globalvia has established a Talent Management process in order to align the current and future needs of the organization, with the ability, potential and aspirations of its employees.

To do this, twice a year the Steering Committee meets to analyze the employee's developments in order to detect High Potential Performers (HIPO), meaning a person with ability, motivation and commitment to successfully perform the duties of a more senior and critical role than the one currently performed.

5 Photo contest 2013

In October 2013, Globalvia encouraged all its employees to participate on a II Corporate Photo Contest, offering them the opportunity to take part on the Company's calendar design. The Communication Department set the basis:

- › 12 pictures were going be chosen as the ones to be published and print in the Corporate 2014 calendar.
- › Any employee, no matter their hierarchal level, could participate.
- › The theme of the pictures was "The Path".
- › All the photos needed to be sent to the Communication Department that was in charge of uploading them in the intranet in order to be available to everyone.
- › Once in the intranet, any employee could vote their 12 favorite pictures.
- › A total of 300 photos were sent.
- › The upload of the photos was anonymous.
- › The owner of the most voted photo won an iPad.
- › The 12 most voted pictures were the ones published in the Corporate calendar.



Photo contest winners.

IV.2 Implementation of labor actions

6 Sport promotion within the Company



During 2013, Organization and CSR Department has organized and Anybody from the Company sponsored the first Globalvia Paddle Contest: Open Globalvia. could participate and games took place by couples. A total of 10 couples have participated and the winners were announced on the Company’s intranet.

Globalvia also subsidies a soccer team. This is a great recreational activity for the whole Company. In addition to competitive soccer, there is a relaxed social aspect which fosters great team camaraderie. The team plays at least one a week against other organization’s teams.

In 2013, Globalvia created the Runners Club at the initiative of employees. The Company paid registration fees and delivered the sport material to the participants. The first race was held on the 15th December in Madrid and counted on 7 employees.

7 Children sport promotion

Globalvia promotes sports to be practiced among children by financing the creation of a handball school league.

Moreover, Globalvia supported the local Gaelic Sports team Rathoath GAA Club in Meath county, close to Dublin. The local Gaelic Sports clubs play one of the most influential role in Irish society, that extends far beyond the basic aim of promoting Gaelic games. They are volunteer community based organisations that promote Irish culture and values to people of all ages and seek for lifelong participation from the local families.



Handball School League (Andorra)



Rathoath GAA Club (Meath County - Ireland)

IV.2 Implementation of labor actions

8 Membership in economic associations



In 2013, Globalvia Inversiones Ireland collaborated with the ISEA (Ireland Spain Economic Association) becoming a member. The goal of the Association is to promote bilateral business relations between Ireland and Spain. The Association works in close cooperation with the Commercial Office of the Spanish Embassy and also Enterprise Ireland. The Association also established a counterpart association in Madrid under the patronage of Ireland's Ambassador to Spain.

IV.3 Measurement of labor outcomes

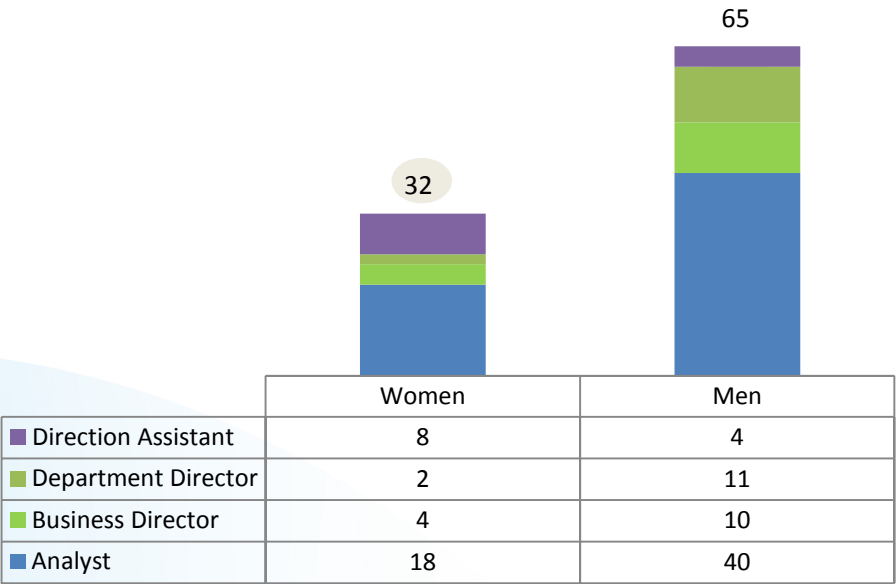
“...the elimination of discrimination in respect of employment and occupation.”

The following paragraphs state the relevance of labor rights for Globalvia, through the implementation of various actions:

- 1 Employees distribution by gender and hierarchal level
- 2 Accidents, absenteeism and illness records
- 3 Internal quality of service survey

1 Employees distribution by gender and hierarchal level

Records from January 2014 shows the following employee at Corporation (Concessions and Societies not included) distribution by gender en hierarchal level:

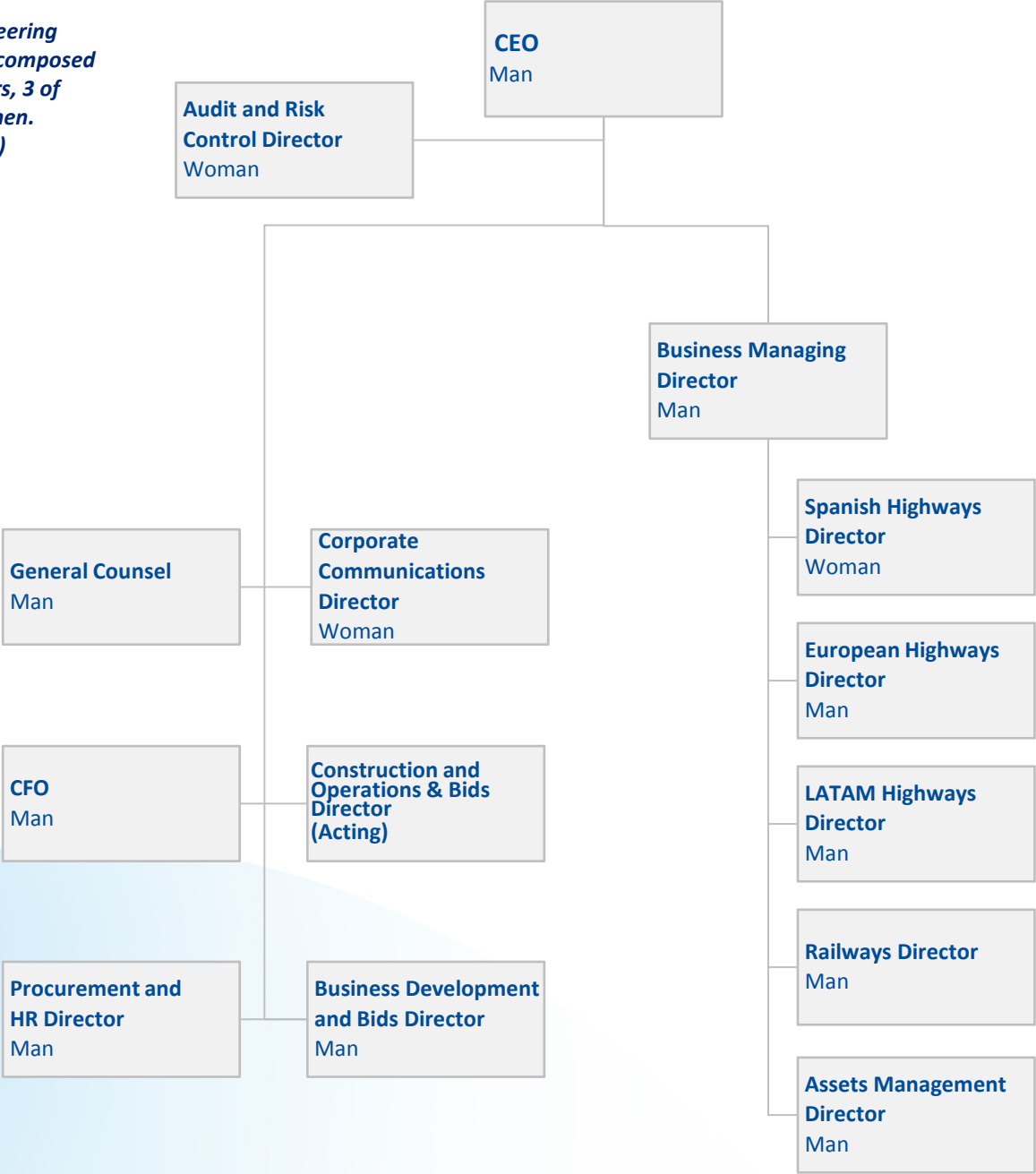


From its 97 employees, 32 (33%) are women. From these women, 6 of them (19%) are at seniority level in the Company.

In January 2014, Steering Committee is composed by 13 members, 3 of them are women. (figure shown in the next page).

IV.3 Measurement of labor outcomes

Globalvia's Steering Committee is composed by 13 members, 3 of them are women. (January 2014)

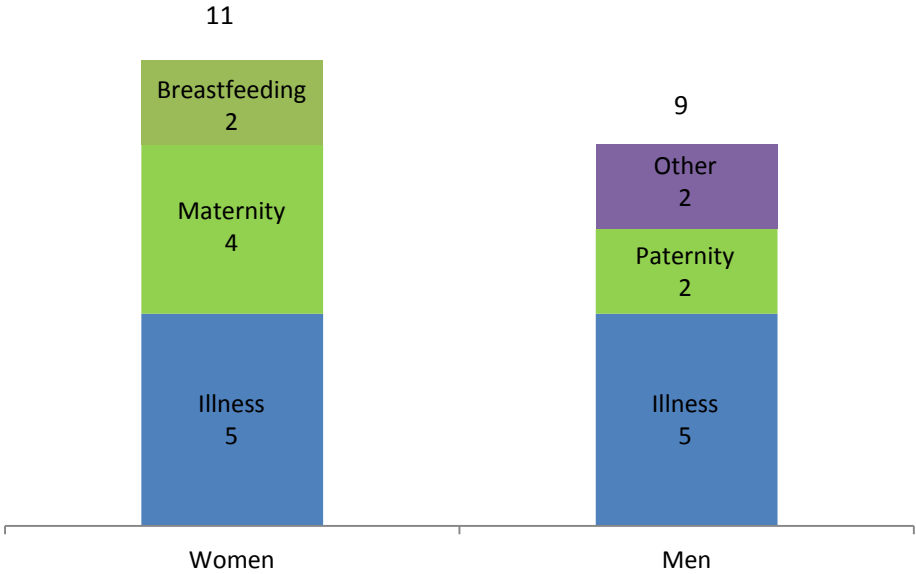


IV.3 Measurement of labor outcomes

2 Accidents, absenteeism and illness records

The Company keeps record of every accident and absenteeism of their employees

- As of April 2014, 3 accidents have taken place since 2007.
- **Absenteeism and illness**, split into gender and absence reason, in 2013:



3 Internal quality of service survey

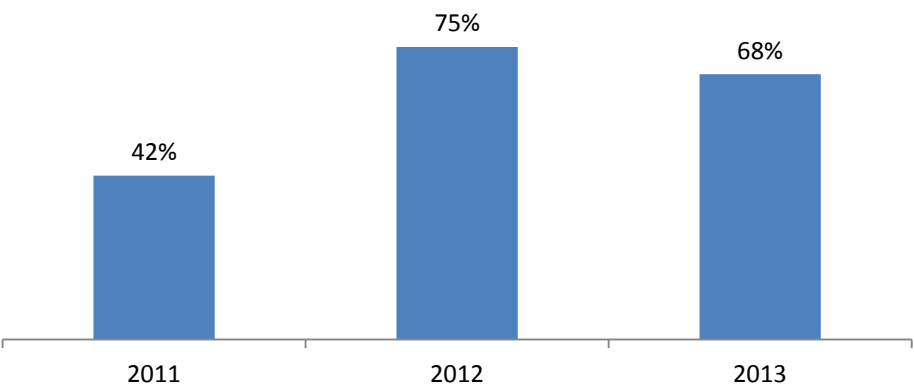
During 2013, as part of the CSR Plan a **internal satisfaction survey** has taken place.

With this, Globalvia **evaluates the perceived satisfaction of the Company's employees**, regarding the service provided by the Corporate Services as well as their perception in relation to the requests made to them by the different Business Areas.

The survey was launched on the 27th of January 2014 and was closed on the 10th of February 2014.

IV.3 Measurement of labor outcomes

A total of 150 people were invited to respond to the survey and 102 people did so, producing a total **participation of 68%**. This data leads us to the conclusion that participation in 2013 has slightly decreased (-6%) compared to participation in 2012, although the number of responses has not varied (103 responses in 2012 vs. 102 responses in 2013).



V. ENVIRONMENTAL PRINCIPLES

V.1 Environmental assessment, policy and goals

“Businesses should support a precautionary approach to environmental challenges...”

As of today, Globalvia has ISO 9001 and 14001 certification and has developed various CSR Strategic plans.

Globalvia upholds a commitment in conducting its business around the environmental preservation and the struggle against climate change

- 1 ISO certifications 9001 and 14001
- 2 CSR strategic plan (and specific to Concessions)
- 3 Environmental Impact Declaration

1 ISO certifications 9001 and 14001

In March 2012 the Organization and CSR Department launched **GlobalQuality**. The aim of this project was to **redefine all processes** in order to ensure that all subsidiaries applied the same approach to everyday work. This project was a success that culminated in the 9001 and 14001 certification.

- **ISO certification 9001**, is the internationally recognized standard for the quality management of businesses. It applies to the processes and services Globalvia supplies, and prescribes systematic control of activities to ensure that customers needs are met.

<http://www.ISO.es/ISO/certificacion/buscador/fichacertificado.asp?empresaISO=AEN&codigo=112031#.UWf3Yqlvm8A>

- **ISO certification 14001**, Maps out a framework that a company or organization can follow to set up an effective environmental management system and helps identify and control Globalvia’s environmental impact and constantly improve its environmental performance.

<http://www.ISO.es/ISO/certificacion/buscador/fichacertificado.asp?empresaISO=AEN&codigo=112032>

The scope of this certification refers to management (acquisition, operation, control and monitoring) of concessions infrastructures (highways, motorways and railways), and the preservation, maintenance and operation of highways and motorways. Its includes 11 Globalvia’s centers: **all highways and railways with a majority stake**.

2 CSR strategic plan (and specific to Concessions)

With the objective of assessing Globalvia’s situation regarding Corporate Social Responsibility (CSR) and devising the lines of actions necessary to lead its commitment to sustainable development, an internal diagnosis on CSR has been carried out in 2011, as well as a comparative study of its shareholders and leading competitors, positioning on this subject; with the

V.1 Environmental assessment, policy and goals

aim of better defining, from the obtained results, the sustainability guidelines for the forthcoming years.

As a result of the conclusions reached, the Company has pledged a Strategic Plan to horizon year 2014 to establish the framework and guidelines to be followed by the Company in this field.

The Strategic Plan defines global short, medium and long term initiatives for each key issue needed to develop CSR at Globalvia. The implemented actions or initiatives related to this matter and focusing on environment are described in the next chapter “Implementation of environmental actions”.

3 Environmental Impact Declaration

Spanish legislation establishes the obligation to prepare an Environmental Impact Declaration, prior to the administrative decision related to the authorization and development of constructions and activities, is adopted.

The process starts with the Environmental Impact Assessment Procedure, where the General Directorate of Quality and Environmental Assessment examines the record sent by the Highways Directorate. The dossier includes an informative study, an environmental impact study and the result of public information.

Once analyzed, the General Directorate of Quality and Environmental Assessment submits to the Highways Directorate a report detailing various alternatives / performances considered, the content of the environmental impact study and protected natural areas affected.

The Environmental Impact Declaration includes:

- › Environmental adaptation of the layout.
- › Soils protection and conservation.
- › Water system protection.
- › Territorial permeability and wildlife protection.
- › Cultural heritage protection.
- › Noise pollution.
- › Location of quarries, spoil, landfill and ancillary facilities.
- › Defense against erosion, environmental restoration and landscape work integration.
- › Monitoring and surveillance.

V.2 Implementation of environmental actions

“...undertake initiatives to promote greater environmental responsibility; and...”

Here are few concrete actions that support the implementation of environmental policies, reduce environmental risks, and respond to environmental incidents:

- ❶ Collaboration agreement with Abadía de Montserrat Foundation
- ❷ Training on ISO certifications
- ❸ CSR strategic plan (and specific to Concessions) implementation
- ❹ Túnel de Sóller archeological site
- ❺ Underwater photography contest
- ❻ User awareness in waste management
- ❼ Creating the Universal Path Carara
- ❽ Son Espases University Hospital: Energy Efficiency Plan
- ❾ 360° Infrastructure Awards
- ❿ “Movimiento ECO”, companies against fire
- ⓫ Sustainable mobility

❶ Collaboration agreement with Abadía de Montserrat Foundation

In the framework of the Strategic Plan 2012-2014 CSR, it is highlighted the importance of working with communities around Globalvia's assets. Therefore, from the Department of Organization and CSR, it was considered a very good opportunity to collaborate with the Montserrat 2025 Foundation whose aim is to maintain, promote and encourage the social, spiritual, cultural and ecological values of the Monastery and the Sanctuary.

Throughout 2014 Globalvia will collaborate in one of the priority actions for the Monastery: ensuring water supply and supervising fire protection equipment of the Sanctuary Montserrat (Barcelona).

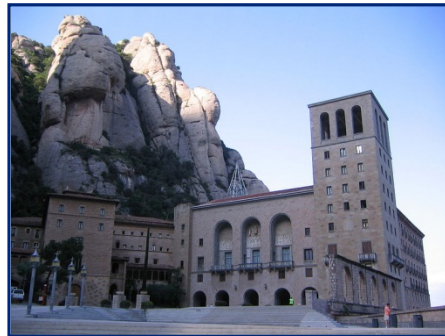


Globalvia's CEO visits Abadía de Montserrat

“...encourage the development and diffusion of environmentally friendly technologies.”

V.2 Implementation of environmental actions

Abadía de Montserrat is made up of different buildings: museum, hotel and residential areas. These facilities are equipped with fire protection systems and external networks hydrants that cover the entire area and must operate simultaneously.



Abadía de Montserrat

② Training on ISO certifications

Within the Company's training and development plan, there is a specific learning session related to Environmental issues that is given during the "Coming in" Welcome session.

This specific session is known as Training on Quality and Environmental Management System and is given to all Globalvia's employees, following a scheme that includes:

- › Management system definition focusing on environmental issues
- › Environment, pollution and sustainable development definition
- › Environmental Management System: objectives and processes (identification and analysis / evaluation of environmental issues, identification and analysis / evaluation of legal requirement compliances, targets and planning, operational control and monitoring)
- › ISO 14001 Requirements: general requirements, environmental policy, planning, implementation and operation, controlling and monitoring, Board review

Related to the last point, the final Board review has recently stated that:

- › The Quality and Environmental Management System implementation has required a remarkable effort throughout the organization.
- › Specific Environmental and Quality objectives have been defined for each Concession to reduce environmental impact

V.2 Implementation of environmental actions

Integrating environmental protection in the management policy of infrastructures is a constant challenge in Globalvia's activity

③ CSR strategic plan (and specific on Concessions) implementation

The CSR Strategic Plan involves the entire Company and enables the CSR strategy to be deployed throughout all business areas through specific initiatives adapted to the social reality of the different communities in which Globalvia is present.

Among the different **strategic lines** governing the CSR strategy there is a specific one related to **Environment** where the Globalvia upholds a commitment in conducting its business around the environmental preservation and the struggle against climate change.

Globalvia has the following commitment with the environment: **“Reduction of the environmental impact of Globalvia’s activities, also maintaining a respectful approach that benefits the environment”**.

To overcome this statement, there are two core objectives for the whole organization:

- Promoting improvements and innovation projects with an environmental impact
- Diagnosis of the environmental impact of operations through a single Environmental Management System for the entire Group. The system's support is mainly based on comprehensive systems certified under standards that contribute to reducing environmental risk, contemplating compliance with both the law and the various international commitments assumed as well as with internal regulations

Globalvia also defines a group of objectives to be applied on each phase of the business engagements:

- **Project**
 - › Maintaining strict laws' consideration and excellent performing of the environmental studies.
 - › Studying and integrating minimization measures concerning acoustic protection, draining waters treatment, landscaping and ecological passages.
- **Construction**
 - › Including specific environmental considerations in the building contracts.
 - › Minimizing the impact by means of environmental training, environmental monitoring, archeological follow up and recovering and reintegrating affected areas.

V. ENVIRONMENTAL PRINCIPLES

V.2 Implementation of environmental actions

› Environmental Impact Analysis review and follow up in order to identify, predict, evaluate and mitigate the biophysical, social, and other relevant effects of Globalvia's activity.

- **Operation**

› Cooperating with the Environmental Management System, not only in terms on monitoring, but conducting the appropriate initiatives to mitigate the environmental impact.

Aligned with these objectives, Globalvia plans to perform the following initiatives for the period 2013-2015:



Good environmental practices: stickers

- **Joining the Carbon Disclosure Project (CPD):** Along with Globalvia's commitment to environmental preservation comes the need to know the impact of its activities, and to clearly expose to the stakeholders both the measures and the actions towards its reduction. The CDP provides a disclosure capability, allowing Globalvia to provide visibility to its stakeholders and also to obtain a disclosure and efficiency score that allows itself to analyze the effectiveness of its policies against market players.

- **Energy Efficiency Plan:** Strategies to reduce the environmental impact aim to make less polluting processes and anticipate future regulations that affect the Company's business, particularly in terms of greenhouse gas emissions and waste management. As a result, Globalvia has planned to launch an Energy Efficiency Plan during next year. To do so, it is required that the Company conducts an energy audit at the corporate Head Offices and concessions to identify potential energy-saving opportunities. The energy audit consists in a situation analysis that provides information on the operation of the building, the level of demand for energy used by services, the operation of its power systems and facilities and the condition of the components, energy consumed and associated operating costs. After that some targets of reduction will be established through the implementation of energy efficiency measures.

On the other hand, Globalvia has developed a **specific CSR strategic plan in Costa Rica**. Ruta 27 CSR strategic plan activities are split into three action pillars: Education (2011-2012), Environment (2013) and Fauna (2014).

The actions developed in 2013 are described in this report.

V.2 Implementation of environmental actions



4 Túnel de Soller archeological site

Since the XIII century Arab site was discovered in November 2011, the project managers have done important research and outreach with support of companies like Globalvia. In 2013 the project included management of information and study of the recovered materials.



Panoramic of the archeological site



5 Underwater photography competition

Globalvia collaborated with the Club Náutico de Sóller by promoting marine ecosystem assessment; for that reason, an underwater photography competition was organized.

6 User awareness in waste management

Globalvia has designed posters with awareness messages to users and these have been placed along highways.

Moreover, Globalvia has delivered travel bags to all users in order to store the waste generated during their trip and throw them in the appropriate place at other destination.



Awareness message (Aconcagua Highway)

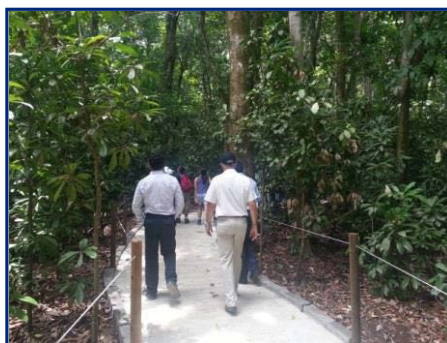


Delivery of travel bags (Ruta 27 Highway)

V.2 Implementation of environmental actions

7 Creating the Universal Path Carara

Globalvia is one of the main companies that supported the project to build the universal trail in Carara National Park (Costa Rica). With this infrastructure, people with different disabilities can visit the park without any limitations.

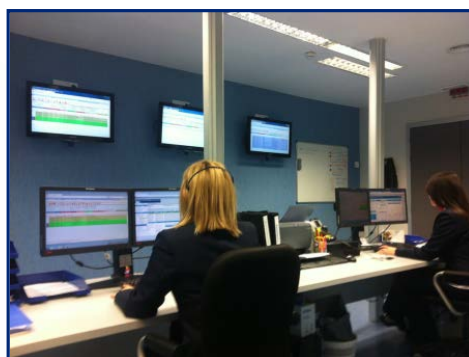
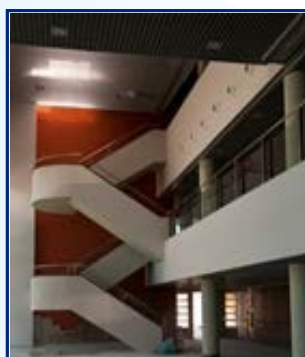


Carara National Park (Costa Rica)

8 Son Espases University Hospital: Energy Efficiency Plan

The measures contained in the phase I of the plan are:

- lighting optimisation at common zones.
- air conditioning optimisation during off peak hours.
- continuous monitoring of lighting and air conditioning.



Son Espases University Hospital: common zones

V.2 Implementation of environmental actions



Nuevo Necaxa-Avila Camacho Highway

9 360° Infrastructure Awards

Nuevo Necaxa-Avila Camacho project has been selected as one of 12 finalists for the 360º Infrastructure Awards organized by the Inter-American Development Bank (IDB) in conjunction with Harvard University. These awards are intended to identify, educate and promote sustainable approaches. Through the Awards, these projects are recognized from the perspective of sustainability with special emphasis on climate, environment, social, governance and innovation.

10 “Movimiento Eco”, companies against fire.

GLOBALVIA contributes and promotes the socio-economic and cultural development of the Transmontana region by joining the “Movimiento Eco” (“Eco Movement”).

This initiative aims to protect the value of forests through the development of actions and the dissemination of messages that mobilize citizens and encourage the practice of attitudes that prevent fires and the risk behaviors that cause them.



“Movimiento Eco” posters

Through promoting civil awareness about the need to preserve forests, the “Movimiento Eco” is meant to reduce the number of forest fires and the consequent decrease of forests affected.

11 Sustainable mobility.

Some concessions have acquired electric vehicles in 2013. Therefore, in addition to promoting sustainable mobility, they improved the access of emergency services in case of fire. Thus, Globalvia reinforces its image as a company committed to the environment.

V.3 Measurements of environmental outcomes

Globalvia has identified and assessed all environmental issues generated as a result of its activities in all the Societies and areas included in the ISO 14001, which are:

- 1 Corporate
- 2 Ruta de los Pantanos
- 3 Concesiones de Madrid
- 4 Túnel d’Envalira
- 5 Autopista Central Gallega
- 6 Túnel de Sóller
- 7 Sociedad Concesionaria del Itata
- 8 Sociedad Concesionaria del Aconcagua
- 9 Chile Country Office
- 10 Ruta 27
- 11 Tranvía de Parla

Moreover, there are other Societies certified in ISO 14001 with their own Management Systems:

- 1 Autopista Nuevo Necaxa-Tihuatlán, S.A.
- 2 M50 Concession Limited
- 3 Hospital del Sureste, S.A.

The following table shows some of the indicators identified and evaluated for each Society, that help monitoring the impact of the company on the environment:

- | | |
|---|--|
| <ul style="list-style-type: none">• Power consumption• Water consumption• Paper consumption• Salt consumption (winter maintenance)• Paint consumption (road and graffiti)• Pesticide consumption• Solvent consumption• Vehicle fuel consumption and machinery• Waste: batteries containing mercury• Waste: electrical and electronic equipment | <ul style="list-style-type: none">• Waste: solid waste generation• Waste: plastic containers• Waste: alkaline batteries• Waste: paper and cardboard• Waste: fluorescent• Waste: toner• Pruning• Waste: metal junk• Other urban waste• Waste from cleaning ditches |
|---|--|

V.3 Measurements of environmental outcomes

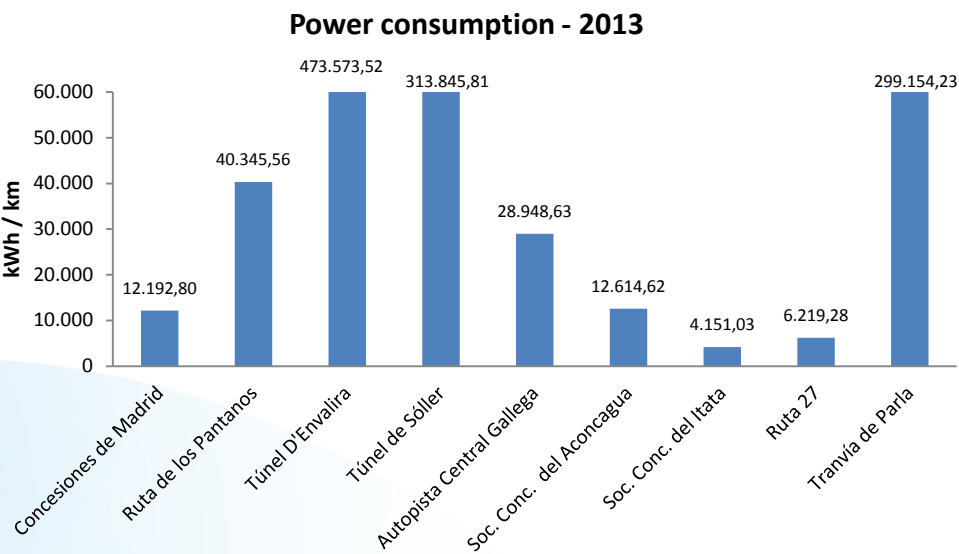
Societies made the identification and assessment of environmental aspects, obtaining the following relevant results (measured both in highways and Concession centers and calculated per km).

1 Power consumption

Highest levels are recorded in Túnel D’Envalira and Túnel de Sóller, due to the tunnel ventilation systems.

Trams run on electricity, so power consumption is higher than in other Societies. However, the energy used in Tranvía de Parla is 100% from renewable sources.

In case of Ruta 27, this indicator has been recorded since October 2013, so the data are still not representative because time series are short.



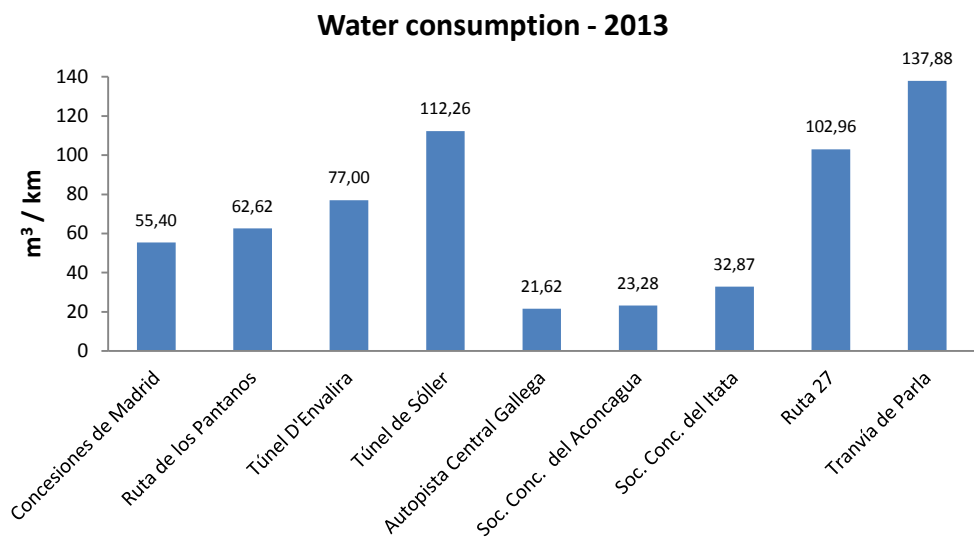
Based on the guidelines defined in Quality and Environmental Management System, Societies will continue raising awareness among its employees to reduce energy consumption and analyze energy efficiency measures implementation feasibility.

In the framework of Globalvia’s Quality and Environmental Management System, some Societies have established environmental objectives in order to reduce their power consumption. The results will be analyzed at the end of 2014.

V.3 Measurements of environmental outcomes

2 Water consumption

Highest level is recorded in Tranvía de Parla, due to the trams’s tunnel washer.



Based on the guidelines defined in Quality and Environmental Management System, Societies will continue raising awareness among its employees and analyzing the best available technologies to reduce water consumption.

In the framework of Globalvia’s Quality and Environmental Management System, some Societies have established environmental objectives in order to reduce their water consumption. The results will be analyzed at the end of 2014.

VI.1 Anti-corruption assessment, policy and goals

“Businesses should work against corruption in all its forms, including extortion and bribery.”

Globalvia presents the following assessments, policies, goals that prove the relevance of anti-corruption for the company.

- ❶ Fraud procedure
- ❷ Compliance Manual

❶ Fraud procedure

Globalvia has identified two main types of potential fraud:

- › Internal fraud; carried out by employees
- › External fraud; carried out by people / entities out of the Company

The Group has established several procedures to mitigate the internal fraud:

- › Company Level Controls; the Company has established and adequate control environment that is transmitted from top management to all the employees. Management's commitment to integrity and ethical behavior is effectively communicated throughout the Company, both in words and deeds.
- › Management incentives are balanced. Compensation policy does not promote an excessive level of interest in increasing the entity's earnings trend.
- › Adequate segregation of duties.
- › The Company has established adequate policies and procedures for authorization and approval of transactions at the appropriate level, specifically in Purchase, Payments and Treasury areas.
- › Hiring policies are centrally defined at Group level. Hiring requests of the management team from subsidiaries are centrally approved.
- › Management shows a willingness to consult with the auditors on and address significant matters relating to Internal Control and accounting issues.
- › The Group has a whistleblower scheme in place in order to detect any potential fraud situation (annex of the code of ethics).
- › Management takes appropriate disciplinary action in response to departures from approved policies and procedures or violations of the Code of Ethics, if any.
- › The Group has an Internal Audit Function that monitors that Internal Control activities are being performed and policies and procedures are being duly applied.

VI.1 Anti-corruption assessment, policy and goals

Special consideration should be given to a recent new regulation on Spanish Penal/Criminal Law that was passed on December 2010. Although the recent amend of legislation has not yet been applied in place by Courts, Globalvia response has been to carry out together with an external advisor an exercise to identify risk map in this field as well as the potential gaps that may exist with its internal control procedures. This initiative is led by the Internal Audit Area together with the Legal and Procurement&HR Areas. The result of this task will be the achievement on an Antifraud and Crimes Procedure that shall be a binding internal procedure and that, from a penalty perspective, will help to minimize or exempt the company potential responsibility.

For external fraud, the main procedures in place are focused on the safeguarding of assets (both tangible and intangible).

All locations of the Group have physical access security procedures in place.

Regarding intangible assets, mainly data and information stored in the computers, the Group has established access controls to the network and servers in order to prevent or detect unauthorized accesses. Additionally, all the computers have logical and physical security controls in place.

2 Compliance Manual

The Organization and CSR Business Direction of Globalvia has defined, in May 2012 (recently updated on January 2013), a **Compliance Manual** that establishes the **functions and responsibilities related to the identification, review and compliance with the service requirements** provided by the Company.

This Manual applies to offers, orders and contracts with customers and it details the following issues:

- › Service requirements identification, both related to Corporate and Country Offices, as well as Concessions
- › Internal and external services provided by Globalvia
- › Operating procedure, both for internal and external customer
- › Compliance Committee, further details are included in the next point "VI.2 Implementation of anti-corruption action"

VI. ANTI-CORRUPTION PRINCIPLES

VI.2 Implementation of anti-corruption actions

Globalvia has established a **Compliance Committee** which aim is to **identify, advise, assess, warn and monitor any compliance risk**. This meant as any case of receiving sanctions by statutory or regulatory violations, financial loss, or reputation loss due to non-compliances with current law, regulations, ethics codes, and best practices standards defined in QEMS procedures.

Compliance Committee comprises the following members:

- › Committee Leader: Internal Audit and Risk Management Director
- › General Counsel responsible
- › Organization and CSR Director
- › Head of Department of Labor Relationships
- › Assistant to Finance Direction

The meeting will take place semiannually in which a **Compliance Report** will be defined, for its further validation from the President and therefore its communication to the Steering Committee and Country Offices and Concessions / Societies responsible.

The Compliance Report includes the following issues:

- › Critical regulatory issues to monitor.
- › Critical internal regulations issues to monitor.
- › Developments in regulatory areas: responsible for updating the legislation and providing full legal text as it is published in the official papers. It is also advisable to know in advance its publication and any other applicable regulations, in order to anticipate potential investments and interventions
- › New identified risks.
- › Proposed mitigation actions.

Also, to report any irregular situation or potential fraud, the employee should contact immediately with General Counsel via email.



Code of Ethics video screenshot

VI.3 Measurements of anti-corruption outcomes

Regarding Globalvia's anti-corruption performance, the Company's Internal Audit and Risk Management Direction has made the following statement:

“Globalvia has not been involved in any legal cases, ruling or other events related to corruption and bribery. Globalvia performs different internal audits every year and the report is directly submitted to the CEO. Our books and accounts are subjected to statutory external audit annually. These audits are used as one of the methods of identifying any suspicious payments which could be related to bribery or corrupt behavior. There has been no such incident reported to the period.”

In regard to the measurement of anti-corruption outcomes, various actions have taken place during 2013:

- **First semester**

- › Internal audits of four different concessions.
- › Compliance Committee.
- › Update the company's Risk Map.

- **Second semester**

- › Internal audits of six different concessions.
- › Compliance Committee.

From these audits, a total of 163 actions were identified. This data leads us to the conclusion that the number of actions in 2013 has decreased compared to the results in 2012 (197 actions).

VII. Conclusions

Globalvia is consolidating its position as a reference player in all the countries in which it operates by conducting its business in a responsible manner and establishing trusting relationships with its stakeholders.

This commitment is key to understand the **effort carried out for the past three years**. The company has accomplished the task to review and redefine all processes, is investing in learning and development initiatives for its employees and is making a great effort to manage environmental issues.

These activities have now become part of Globalvia's business daily operations. We care about the impact we make on the environment and this concern is totally aligned to the strategic objectives. This report shows our commitment to communicate our actions with credibility and authenticity, internally and externally, with the hope that the reward will be a better world for today and a greater hope for tomorrow.

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