

*English translation for information purposes only. In the event of discrepancies between the English and the Spanish version, the Spanish version shall prevail.*

# **CODE OF CONDUCT** **IN THE SECURITIES MARKETS**

**24 February 2022**

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## **PREAMBLE AND OBJECT**

The present Code of Conduct in the Securities Markets (the "**Code of Conduct**" or the "**Code**") is part of the Company's system of corporate governance and establishes rules of conduct on matters relating to the securities markets that affect the Group.

Without prejudice to the applicable statutory provisions, the Code of Conduct imposes obligations, constraints and prohibitions on those persons bound by it in order to safeguard the interests of investors in the Affected Securities and to prevent and avoid situations of abuse, encouraging transparency and facilitating, at the same time, the participation by the Directors and employees in the capital of the Company.

## **PART ONE: DEFINITIONS AND SCOPE OF APPLICATION**

### **ARTICLE 1. DEFINITIONS**

For the purposes of the Code of Conduct, the following definitions apply:

- a) **Directors:** the members of the Company's governing body.
- b) **CNMV:** Spanish Securities Market Commission.
- c) **Supervising Manager:** the manager of the Group responsible for maintaining and updating the List of Insiders. This person shall be designated by the Chairman of the Board of Directors of the Company, the Chief Executive Officer (the "**CEO**") of the Company or the CEO of the Subsidiary corresponding to the operation giving rise to Inside Information. In the absence of express designation, these duties shall be assumed by the corresponding Legal Affairs Director.
- d) **Subsidiary:** any of the companies or entities whose relationship to the Company meets any of the premises of article 42 of the Commercial Code.
- e) **Group:** the Company and the Subsidiaries.
- f) **Inside Information:** information of a precise nature which has not been made public, relating directly or indirectly to one or more of the Affected Securities issued by the Company, any Subsidiary or any issuer outside the Group, or to the issuer of those Affected Securities and which, if it were made public, would be likely to have a significant

effect on the price of the Affected Securities or the related derivative financial instruments.

For these purposes, it shall be considered that the information is of a precise nature if it indicates a set of circumstances which exist or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, always provided that that information is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the price of the Affected Securities or the related derivative financial instruments.

In cases of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

An intermediate step in a protracted process shall be deemed to be Inside Information if, by itself, it satisfies the criteria relating to Inside Information mentioned in this definition.

By information which, if it were made public, would be likely to have a significant effect on the price of the Affected Securities or the related derivative financial instruments, shall be understood any information that a reasonable investor would be likely to use as an element of the basis of his or her investment decisions.

- g) **Insiders:** those persons, including External Advisers, who have access on a temporary basis to Inside Information, during the time that they are included in the List of Insiders, and until such time as the Inside Information that gave rise to the creation of such List has been disclosed to the market, or until such time as they receive notification from the Secretary of the Board of Directors of the Company (the "**Secretary of the Board**") or the Supervising Manager (for instance, on the occasion of the suspension or desistance from the operation which gave rise to the Inside Information).
- h) **List of Insiders:** the list envisaged in article 10 of this Code.
- i) **Treasury Share Operations:** shall have the meaning given in article 12 of the Code.

- j) **Personal Transaction:** any transaction relating to the Affected Securities conducted by the Affected Persons or their Related Persons for their own account, under the terms provided for in the statutory provisions applicable.
- k) **Persons Discharging Management Responsibilities:** the Directors, the members of the Management Committee of the Company and the senior managers of the Company possessing regular access to Inside Information relating, directly or indirectly, to the Company, as well as power to take management decisions affecting the future developments and business prospects of the Company.
- l) **Affected Persons:** Persons Discharging Management Responsibilities, the Treasury Shares Manager defined in article 12.3 of this Code, and those persons who, pursuant to the regulations in force at each moment, are included by the Secretary of the Board in the register envisaged in article 2.2 herein due to their regular and recurring access to Inside Information.
- m) **Related Persons:** the persons maintaining any of the following relationships with the Affected Persons: (i) the spouse or person considered equivalent under the law of Spain; (ii) the dependent children; (iii) any other family member who lives with them since at least one year prior to the date upon which the existence of that link ought to be determined; (iv) any legal person, *trust* or association in which the Affected Person or the aforementioned persons holds a managerial post, or which is directly or indirectly controlled by such a person, or which has been created for their benefit, or whose economic interests are largely equivalent to those of that person; and (v) other persons or entities deemed to constitute Related Persons pursuant to the applicable regulations in force at any given time.
- n) **Company:** Ferrovial, S.A., with registered address in Madrid, C/Príncipe de Vergara, 135 and Tax Identification Number (NIF) A-81939209.
- o) **Affected Securities:** (i) any negotiable securities issued by the Company or the Subsidiaries admitted for trading or for which admission for trading has been requested on a secondary official market or other regulated markets, multilateral trading systems, organised trading systems or other organised secondary markets; (ii) the financial instruments and contracts of any kind bestowing the right to acquire or transfer those securities, including those not negotiated on secondary markets; (iii) the financial instruments and contracts whose underlyings are securities, instruments or contracts

of the aforementioned kinds, including those not traded on secondary markets; and (iv) for the purposes of article 6 of this Code, those securities or financial instruments issued by other companies or entities with respect to which Inside Information is available.

## **ARTICLE 2. SUBJECTIVE SCOPE OF APPLICATION**

1. The Code shall be applicable, to the pertinent extent, to:
  - a) Affected Persons.
  - b) Insiders.
2. The Secretariat of the Board shall draw up and keep up to date a register of Affected Persons and a register of Related Persons to the Persons Discharging Management Responsibilities, with these registers being kept confidential. The Secretariat shall inform the Affected Persons of their inclusion in the first of the registers mentioned and of their subjection to the Code, indicating where this is at their disposal.

The Affected Persons shall acknowledge receipt of the communication referred to in the preceding paragraph.

3. Likewise, the Persons Discharging Management Responsibilities shall notify their Related Persons in writing of their obligations arising out of this Code and shall retain a copy of this notification.

## **PART TWO: TRANSACTIONS IN AFFECTED SECURITIES**

### **ARTICLE 3. OBLIGATION OF COMMUNICATION**

1. ***Persons Discharging Management Responsibilities and their Related Persons***

The Persons Discharging Management Responsibilities and their Related Persons shall send to the CNMV and the Company, within three business days after conducting any Personal Transaction, a communication in the form provided for in the applicable regulations when, within a calendar year, the total amount of the Personal Transactions they conduct reaches €20,000 or such amount as may be set out by said regulations, as the case may be. This threshold shall be applied to the sum of all the Personal Transactions, and these may not be offset against each other. The notification to the Company may be made by sending the notification made to the CNMV to the Secretariat of the Board.

The Persons Discharging Management Responsibilities shall notify the Secretariat of the Board of all Personal Transactions even if the threshold indicated in the previous paragraph is not reached, as well as the number of Affected Securities remaining in their possession after the execution of said Personal Transaction.

The Company may act as representative of the Persons Discharging Management Responsibilities in communicating their Personal Transactions to the CNMV in cases where this is mandated by the applicable statutory provisions, when the interested party requests this from the Secretariat of the Board. When the communication is made by the Company, the Person Discharging Management Responsibilities must immediately provide the Secretariat of the Board with all the information required to carry out the notification in an appropriate manner; in particular, the date of the Personal Transaction, its nature, the volume of Affected Securities, the unit price and the market in which it was carried out.

2. ***Other Affected Persons and their Related Persons***

Affected Persons other than the Persons Discharging Management Responsibilities and their Related Persons must send, within the period of three business days after conducting any Personal Transaction, a communication to the Secretariat of the Board, using the form attached to this Code as Annex I.

The quantitative threshold provided for in the first paragraph of the previous section shall apply to the notification of these Personal Transactions.

3. ***Archive***

The Secretariat of the Board shall archive and retain all of the communications to which this article refers. The data in that archive shall be of a confidential nature.

#### **ARTICLE 4. RESTRICTIONS**

1. Without prejudice to the provisions of Part Three herein, the Affected Persons may not conduct transactions relating to the Affected Securities for its own account or for the account of a third party, directly or indirectly:
  - a) During the period of thirty calendar days before the date of submission by the Company to the CNMV of the periodic

economic-financial information that the Company must make public according to the applicable regulations, and until said submission takes place.

- b) During the periods that may be determined by the CEO of the Company, after consultation with the Secretary of the Board and the CFO, in order to best comply with the Code.
2. Except as provided for in article 6 of the Code, Insiders may not conduct transactions in Affected Securities while in that capacity.
3. Without prejudice to articles 6 and 11 of the Code and other applicable regulations, the Company may authorise the Affected Persons to conduct transactions during the closed period provided for in paragraph 1(a) above, in cases where the applicable regulations so permit.
4. When the Affected Persons have any doubts with respect to transactions with Affected Securities, they should consult the Secretariat of the Board of Directors and refrain from taking any action until a response is received.

## **ARTICLE 5. PORTFOLIO MANAGEMENT**

1. The Affected Persons and their Related Persons are obliged to communicate, in the time period and form envisaged in article 3 herein, those transactions relating to Affected Securities conducted in their name or in their benefit by a third party by virtue of a discretionary asset or portfolio management contract.

These communications shall be included in the archive set out in article 3.3 of this Code.

2. In discretionary portfolio management contracts which are yet to be formalized, the subjection of that contract to this Code must be stated expressly. In addition, it must contain an express instruction to the managing entity to refrain from engaging in transactions in Affected Securities prohibited by the Code.

Nevertheless, discretionary portfolio management contracts may be entered into which do not contain the instruction referred to if they are executed at a moment at which the Affected Persons or their Related Persons are not in possession of Inside Information, and provided that those contracts furnish an absolute and irrevocable guarantee that:



- a) the transactions shall be carried out without any intervention by the above persons, and therefore subject exclusively to the professional judgement of the managing entity, and in accordance with the criteria applied in general for their clients with similar financial and investment profiles; and
  - b) the managing entity shall immediately inform the aforementioned persons of the execution of the corresponding transaction relating to the Affected Securities, in order that those persons can comply with their duty of communication.
3. Contracts formalized prior to the entry into force of this Code must be adapted to the provisions herein.

## **PART THREE: PREVENTION OF MARKET ABUSE**

### **ARTICLE 6. INSIDE INFORMATION**

1. The persons subject to the Code who possesses Inside Information must comply both with the provisions herein and in the applicable regulations.

In particular, they shall refrain from engaging in the following conducts:

- a) Dealing with Inside Information. This consists of preparing, attempting to perform or performing any kind of transaction with the Affected Securities to which the information refers, including their acquisition, transfer or assignment, for their own account or for the account of any third party, directly or indirectly. The use of this kind of information to cancel or modify any order related to the Affected Securities to which the Inside Information refers shall also be considered dealing with Inside Information, when the order was placed before they became aware of the Inside Information.

The following are excepted: (i) transactions conducted in good faith in compliance with a previously arising obligation to acquire, transfer or assign Affected Securities, and not so as to elude the prohibition against dealing with Inside Information and this obligation results from an order placed or an agreement concluded before the concerned person became aware of the Inside Information, or whose object is to comply with a legal or regulatory provision prior to the date upon which the person came into possession of the Inside Information. (ii) those performed by

a managing entity by virtue of a discretionary portfolio management contract, pursuant to article 5.2, paragraph 2 herein; and (iii) such other transactions as are permitted by the statutory provisions applicable.

- b) Recommending or inducing third parties to perform any of the actions referred to in the foregoing letter a) in relation to the Affected Securities, or to cause another to carry them out, based upon Inside Information.
- c) Unlawful disclosure of Inside Information. This takes place when a person possesses such information and discloses it to any other person, except when the disclosure is made in the normal exercise of their work, profession or duties.

The subsequent disclosure of the recommendations or inducements to which the foregoing letter b) refers shall likewise constitute unlawful disclosure of Inside Information when the person disclosing the recommendation or inducement knows or should know that it was based on Inside Information.

- 2. The prohibitions contained in this article are likewise binding upon those who, without having been informed of the inside nature of the information in their possession, have become aware of it by reason of their work, profession or duties.

## **ARTICLE 7. PUBLIC DISCLOSURE OF INSIDE INFORMATION**

- 1. Without prejudice to the provisions of article 8 of the Code, the Company shall publicly disclose all Inside Information that directly concerns it, as soon as possible, by notifying the CNMV. The Company shall ensure that the Inside Information is made public in such a manner as to enable rapid access and complete, accurate and timely assessment of that information by the general public.
- 2. No Inside Information may be disclosed by any means unless it has been published on the website of the CNMV. The content of the Inside Information disseminated to the market by any other channel than the CNMV must be consistent with that previously communicated to the CNMV.
- 3. The content of the communication of Inside Information shall expressly state that the information has such condition; it shall be true, clear and complete and, when so required by the nature of the communication, shall be quantified, so as not to lead to confusion or deception.

4. As a general rule, communications of Inside Information to the CNMV shall be sent by the Secretary of the Board.
5. The Company shall designate, at least, one interlocutor authorised to respond effectively and with sufficient speed to queries, verifications or requests from the CNMV for information related to the disclosure of Inside Information.
6. The Inside Information publicly disclosed shall be published on the Company's website, and must be located in an easily identifiable section of such website. The Company shall maintain all the Inside Information it is required to disclose publicly on its website for a period of at least five years.

#### **ARTICLE 8. DELAY IN THE PUBLIC DISCLOSURE OF INSIDE INFORMATION**

1. The Company may delay, under its own responsibility, the public disclosure of the Inside Information when provided that all of the following conditions are satisfied:
  - a) immediate disclosure is likely to prejudice the legitimate interests of the Company;
  - b) delay of disclosure is not likely to confuse or mislead the public; and
  - c) the Company is in a position to ensure the confidentiality of the Inside Information.

In the case of a protracted process that occurs in different stages, which is intended to lead to, or which could as a consequence lead to, certain circumstances or a specific event, the Company may delay the public disclosure of Inside Information relating to that process, subject to the provisions in the preceding paragraph.

2. If the Company delays the disclosure of Inside Information pursuant to this article, it shall submit a justification to the CNMV of the existence of the conditions that allow such delay when expressly requested by the CNMV.
3. In the event that the Company delays the disclosure of the Inside Information, it shall notify the CNMV immediately after making the Inside Information public.

4. If the confidentiality of the Inside Information is no longer ensured, it shall be made public as soon as possible by notifying the CNMV in accordance with the provisions of the previous article. It shall also be made public in those cases in which a rumour refers expressly to Inside Information whose disclosure has been delayed and the degree of accuracy of the rumour is sufficient to indicate that the confidentiality of that information can no longer be guaranteed.
5. When the disclosure of Inside Information is delayed, the Company shall ensure the accessibility, legibility and maintenance of the information as envisaged in the statutory provisions applicable.

## **ARTICLE 9. MEASURES TO SAFEGUARD INSIDE INFORMATION**

1. Access to Inside Information may only be gained by those persons, internal or external to the Group, for whom this is strictly necessary.
2. Persons subject to the Code who possesses Inside Information must follow the necessary measures to ensure the confidentiality of the Inside Information, as well as to ensure the correct processing of the documents, whatever their medium, containing said Information.
3. In particular, such persons shall be required to:
  - a) Safeguard its confidentiality, without prejudice to the duty of communication and collaboration with the judicial and administrative authorities under the terms set out in the applicable statutory provisions.

To this end, they shall take into account, as far as applicable, the measures on creation, identification, access, distribution, storage and destruction provided for in the Group's internal regulations on the classification and processing of confidential information.
  - b) Take the necessary measures to avoid its abusive or unfair use.
  - c) Communicate immediately any abusive or unfair use of Inside Information of which they become aware to the Secretariat of the Board of Directors.
4. The CFO of the Company shall monitor the evolution of the share prices and the volumes of trading in the Affected Securities, as well as the rumours and news that the professional disseminators of economic information and the mass media issue about them. Should an abnormal oscillation in those prices or volumes take place, and there are reasonable indications that the oscillation is taking place as

the result of a premature, partial or distorted disclosure of Inside Information, the CEO of the Company or the Secretary of the Board of Directors shall be made aware immediately.

## **ARTICLE 10. LIST OF INSIDERS**

1. The Company shall prepare a List of Insiders which shall include all persons who have had access to Inside Information. The List of Insiders will include those data required by the applicable regulations.
2. The Supervising Manager shall be responsible for maintaining and updating the List of Insiders.
3. The Company shall maintain the List of Insiders in electronic format. This format shall ensure, at all times, the confidentiality of the information in the List of Insiders, the accuracy of that information and access to earlier versions and their recovery.
4. The List of Insiders shall be updated immediately: (i) when the grounds for inclusion of a person already included in the List of Insiders change; (ii) when a new person must be included in the List of Insiders, as they have access to Inside Information; and (iii) when a person ceases to have access to Inside Information.

The date and time of each updating must be included.

5. The List of Insiders must be retained for at least five years after its preparation or most recent updating.
6. The Supervising Manager shall notify the Insiders in writing of the points envisaged in the statutory provisions applicable and, in any case of, (i) their inclusion in the List of Insiders; (ii) the legal and regulatory obligations that this implies and the sanctions applicable to transactions with Inside Information and to unlawful disclosure, the Insiders having to acknowledge these points in writing; (iii) their duty of confidentiality with respect to the Inside Information and the prohibition upon its use; (iv) the points provided for in the statutory provisions applicable about personal data protection; (v) the obligation to provide the identity of any person to whom the Inside Information is transmitted for the purpose of including that person, likewise, in the List of Insiders; and (vi) of the obligation to make the Company aware of any circumstance which could entail a risk of public disclosure of Inside Information.

In this notification, the Supervising Manager shall include a copy of the Code and shall indicate the period within which the Insiders must send the data as required.

7. The List of Insiders shall be furnished to the CNMV as soon as possible, upon its request.
8. When a List of Insiders is closed, the Supervising Manager shall inform the Insiders as soon as possible.
9. The Company may draw up a permanent List of Insiders that includes all those persons who have access at all times to all the Group's Inside Information. This list shall be updated as appropriate.

The other provisions of this article shall apply, where appropriate, to the List of Insiders provided for in this paragraph.

## **ARTICLE 11. MARKET MANIPULATION**

1. Persons subject to the Code must refrain from the preparation or performance of any kind of practice which could entail manipulation of the market. They must likewise refrain from mere attempts to engage in any of those practices.
2. For these purposes, manipulation of the market includes the following activities, without prejudice to any others envisaged in the statutory provisions applicable:
  - a) entering into a transaction or placing an order to trade, or any other behaviour which:
    - (i) gives or is likely to give, false or misleading signals as to the supply, demand for, or price of, an Affected Security, or else
    - (ii) secures or is likely to secure the price of one or more Affected Securities at an abnormal or artificial level;

unless the person entering into the transaction or placing the order to trade or engaging in any other behaviour, shows that such transaction, order or behaviour have been carried out for legitimate reasons and in conformity with a market practice accepted by the CNMV.

- b) Entering into a transaction, placing an order to trade or any other activity or behaviour which affects or might affect, by means of fictitious mechanisms or any other form of deception or contrivance, the price of one or several Affected Securities.

- c) Disseminating information through the media, including the internet, or by any other means, so conveying or potentially conveying false or misleading signals as to the supply of, demand for, or price of, an Affected Security, or which might so set an abnormal or artificial price level of one or more of the Affected Securities, including the dissemination of rumours, when the originator of the dissemination knew or ought to have known that the information was false or misleading.
- d) Transmitting false or misleading information or providing false data with respect to a reference index, when the person responsible for the transmission or provided the data knew or ought to have known that they were false or misleading, or any other behaviour which might entail a manipulation of the calculation of a reference index.

## **PART FOUR: TREASURY SHARES POLICY**

### **ARTICLE 12. OPERATIONS WITH TREASURY SHARES**

1. For the purposes of this article "**Treasury Share Operations**" shall mean those operations carried out by the Company, either directly or through any of its subsidiaries, which involve shares in the Company.
2. Treasury Share Operations carried out by the Company as the parent company, or by its Subsidiaries, shall be in accordance with the provisions of current legislation and the resolutions adopted in this regard by the General Shareholders' Meeting and by the Board of Directors. The criteria that the CNMV may publish in each case will also be taken into account in its execution.
3. Treasury Share Operations shall avoid any behaviour that could constitute market abuse and shall not be carried out under any circumstances on the basis of Inside Information.
4. Treasury Share Operations shall have a legitimate purpose and may not, under any circumstances, have as their purpose the distortion of, or intervention in, the free formation of the price of the Company's shares on the market, or the favouring of certain shareholders or investors.

A legitimate purpose shall be understood to include, but not be limited to (i) carrying out buyback or stabilisation programmes in accordance with the provisions of the applicable regulations; (ii) to

acquire the shares of the Company that are necessary to comply with any obligations to deliver shares to the employees of the Group; (iii) to execute liquidity contracts or any other market practice accepted by the CNMV or other supervisory bodies, in which case Treasury Share Operations must comply with the rules governing such practices; or (iv) any other purposes admissible under the applicable regulations.

5. No derivative or volatility instruments shall be used in the execution of Treasury Share Operations, unless expressly authorised by the Company's Board of Directors.
6. Treasury Share Operations shall be carried out by the Financial Investments in the Domestic Market Area, which is part of the Corporate Treasury Department, within the Company's Finance Department (the "**Competent Area**"). Within this area a person in charge will be appointed the "**Person Responsible for the Management of the Treasury Shares**", who shall be subject to the Code as an Affected Person.

Care shall be taken that the management of the treasury shares is tight with respect to the rest of the Company's activities. To this end, the Competent Area shall assume a special confidentiality commitment in relation to Treasury Share Operations.

In order to know the situation of the Company's share market, the Competent Area may obtain the data of the market members it deems appropriate, although Treasury Share Operations may not be carried out by more than one participant or market member simultaneously.

No other unit or area of the Group shall carry out Treasury Share Operations, except for carrying out market risk hedging activities.

7. The Company shall notify the CNMV or other regulatory bodies, through the Competent Area, of the Treasury Share Operations carried out, in those cases where this is required by the applicable regulations.



## **PART FIVE: COMPLIANCE WITH THE CODE**

### **ARTICLE 13. UPDATING AND VALIDITY**

The Code shall be updated by the Board of Directors whenever it is necessary to adapt its content to the applicable statutory provisions, subject to prior report by the Audit and Control Committee.

### **ARTICLE 14. MONITORING APPLICATION OF THE CODE**

1. The Secretary of the Board of Directors shall ensure compliance with this Code and shall be responsible for the duties attributed to him herein, and such others as the Board of Directors or the Audit and Control Committee may assign. The Secretary of the Board of Directors may delegate all or some of the duties entrusted to him in this matter.
2. Likewise, he may request all areas of the Group to supply such data or information as he may deem necessary for the performance of his duties.

### **ARTICLE 15. NON-COMPLIANCE**

1. The duties of the Affected Persons and the Insiders established by the Code do not change or amend those imposed by the applicable statutory provisions.
2. Non-compliance with the provisions of the Code shall give rise to the corresponding liability, depending on the nature of the relationship between the person who has failed to comply with the Company or the concerned Subsidiary.
3. The foregoing shall be understood without prejudice to the liability arising from the application of the statutory provisions applicable.

\* \* \*

## ANNEX I – Code of Conduct in the Securities Market

### Notification template for Personal Transaction on Affected Securities conducted by Affected Persons and their Related Persons (other than the Persons discharging Management Responsibilities and their related Persons)<sup>1</sup>

To the Attention of the Secretariat of the Board

Declarant (Affected Person or his/her Related Person)	
Name and surname	
I.D.	
Position/post <sup>2</sup>	
Company <sup>2</sup>	
Affected Person to whom is related <sup>3</sup>	

Company issuer of the Affected Securities				
Date of the transaction	Type of transaction <sup>4</sup>	Affected Security <sup>5</sup>	Volume <sup>6</sup>	Price (€)
Number of Affected Securities held by the declarant after the transaction				

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

<sup>1</sup> Transactions should only be reported once a total amount of €20,000 has been reached within one calendar year (without offsetting purchases and sales).

<sup>2</sup> When the declarant is an Affected Person.

<sup>3</sup> When the declarant is a Related Person.

<sup>4</sup> Acquisition, sale, subscription, exchange, donation, call option, put option, etc.

<sup>5</sup> Shares, debt instrument, derivatives, other related financial instruments, etc.

<sup>6</sup> In the event of conducting transactions of different prices, they will be identified in different boxes.

In compliance with data protection regulations, Ferrovial, S.A., as Data Controller, informs you that your data will be processed in order to establish mechanisms that prevent market abuse within the corporate framework. The applicable legal basis is the legitimate interest of Ferrovial, S.A. to comply with the aforementioned purpose. The data may be communicated to the companies of the Ferrovial Group and will be conserved for the legal periods established in the applicable sectorial regulations. You may access, oppose, rectify, delete, limit the processing or request the portability of your data, if applicable, by contacting [dpd@ferrovial.com](mailto:dpd@ferrovial.com). You may also contact the Spanish Data Protection Agency, especially when your rights have not been satisfied. Please consult the Data Protection Policy at [www.ferrovial.com](http://www.ferrovial.com) for additional information about your data processing.