

1. Purpose and scope of application

1.1 Purpose. This document establishes the basic guidelines for identifying the risks associated with the security of the Abertis Group's information, personnel and assets, as well as guidelines for developing and implementing any measures required to mitigate those risks.

1.2 Scope of application. This Policy is compulsory for all staff members of the companies controlled¹ by the Abertis Group.

2. Basic principles

This Policy sets out the minimum requirements to be met regarding the protection of the individuals, assets and information of the Abertis Group.

The most senior executive in each company shall ensure that their own internal policies and guidelines are implemented and/or adapted in line with this policy and applicable legislation. Internal guidelines may be more restrictive if deemed necessary.

3. Specific guidelines

Within each company, the Security Policy shall take the form of its own security management system in line with Group Regulations. This system shall include:

a. Internal security regulations, which shall specify at least the following:

- The Management team's commitment.
- The company's approach to security management.
- The definition and assignment of general and specific security management responsibilities.

The internal regulations shall also contain guidelines relating to:

- Training and raising awareness on security matters in order to ensure that personnel and external staff are aware of their responsibilities and the consequences of any breach.
- The development and maintenance of a business continuity plan, covering critical processes, identifying the risks thereof and addressing the necessary security requirements in the event of any contingency and/or risk.
- Security incident management to minimise the impact thereof, causal analysis and the implementation of improvements to avoid such incidents.
- Preventive management in critical spheres of activity using physical means to identify and control access, as well as to prevent and detect incidents.

¹ **Companies controlled:** companies in which Abertis owns more than 50% or companies in which the shareholders agreements so determines.

- b. **The analysis and management of the security-related risks** to which each company is subject. To this end, critical assets, the risks to which they are exposed, and the criteria for managing such risks, shall be identified.
- c. **A security plan** that defines, quantifies and plans the actions required to cover the identified risks and to mitigate them to a reasonable extent.

4. **Monitoring and control**

- Each company shall be responsible for establishing appropriate and effective control mechanisms within its internal regulations to ensure that any risk and/or breach of this Policy can be identified and reported.
- The Corporation shall define the minimum methodology required to regularly provide the Group's security statements, as well as the degree of mitigation of the risks addressed. To this end, monitoring and control mechanisms shall be established for the security management systems incorporated within the businesses.

Security Policy_v1

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Approved by: Vice-President and Chief Executive Officer

