

Índice

1. Identification	2
1.1. Purpose.....	2
1.2. Scope	2
1.3. Area of dissemination	2
2. Definitions	2
3. Development.....	3
3.1. Prior considerations.....	3
3.2. Guiding principles	3
3.3. Ways of lobbying	3
3.4. The Affected Persons' responsibilities.....	4
3.5. Supervisory measures.....	5
3.6. Transitional system.....	6
4. File.....	6
5. Referenced documents.....	6
6. Record of Changes	6



1. Identification

1.1. Purpose

The purpose of these regulations is to develop the Prevention of the Corruption at Abertis Group Norm and establish behavioural guidelines for advocacy lobbying, when it is carried out for, on behalf of, or for the benefit of Abertis Group companies.

1.2. Scope

These regulations compulsorily apply to Abertis Infraestructuras, S.A.'s directors, employees and suppliers of lobbying services, hereinafter referred to as "Affected Persons" or "Persons Affected".

1.3. Area of dissemination

The scope of distribution of these regulations is the Corporation's entire staff.

2. Definitions

Lobby (according to the definition provided by the NGO Transparency International, referred to below as TI): any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making, and carried out by or on behalf of any private or non-governmental organised group.

Lobbyists (according to TI's definition): intermediaries for interest groups (professional lobbyists), representatives of the private sector engaged in such work within their companies (in-house lobbyists), public relations consultants, and representatives of NGOs, corporations, industrial and professional associations, trade unions, think tanks and law firms.



3. Development

3.1. Prior considerations

Abertis Infraestructuras, S.A. (referred to below as Abertis) considers it crucial to act responsibly and transparently in order to create trust in its public and private interest groups, so it is seeking to find the best economic, technical, environmental and legal solutions to develop infrastructure based on dialogue and collaboration with different parties. This is all in order to provide greater legal certainty, protect the public interest and also anticipate and adapt to the needs of the public and private sector through innovation, efficiency and ongoing improvement.

3.2. Guiding principles

Persons Affected by these regulations may carry out lobbying activities in order to convey the interests of companies in the Abertis Group in a clear, truthful and exact manner to the public sector (international, national and/or regional) transparently, honestly and with integrity, always in accordance with these regulations and with:

- The Abertis Group's *Code of Ethics*.
- The Abertis Group's *Corporate Reputation Policy*.
- *Prevention of the Corruption at Abertis Group Norm*.
- *Institutional Relations Activities Group Norm*.
- All applicable legislation.
- Any public sector codes of conduct concerning lobbying.

And in accordance with the socially accepted customs and practices of the place in which the lobbying is being carried out.

In any case, all Affected Persons must avoid putting people belonging to the legislature, executive, judiciary and political parties (referred to below as the public sector) in situations of conflict of interest, regardless of the contractual relationship that connects them with the public sector. This situation must also be avoided with former members of the public sector (referred to below as former members) within 18 months of them leaving office, as a general rule, through this must be adapted to the time and requirements stipulated by the applicable legislation in each case.

3.3. Ways of lobbying

Affected Persons may carry out lobbying for, on behalf of, and for the benefit of companies in the Abertis Group in accordance with the guiding principles these norm contain.



Lobbying may take any of the following forms:

1. Direct or indirect communication through any medium or in whatever form the communication takes with members or former members of the public sector in order to argue on behalf of the infrastructure industry concerning any international, national or regional legislative amendment bill, as well as any proposal or amendment to an administrative act or agreement.
2. Being part of associations, corporations, foundations, chambers of commerce, NGOs, trade unions, think tanks or any other influential organisation in which members or former members of the public sector participate, the purpose of which is to argue on behalf of the infrastructure industry concerning any international, national or regional legislative amendment bill, as well as any proposal or amendment to an administrative act or agreement.
3. Contracting other persons to provide lobbying services, whether professional lobbyists, public relations consultants or law firms.

3.4. The Affected Persons' responsibilities

Persons Affected by this norm must carry out at least the following action:

- Make this norm known to: (i) the Abertis Group's interest groups (ii) other lobbying organisations (which are not Abertis suppliers) when the Affected Person/s belong to such organisations (iii) the rest of the Abertis Group companies.
- Register with the pertinent private/public institution when carrying out lobbying and when so required by the applicable legislation.
- Sign up to the codes of conduct of public or private institutions when so requested and when they do not contradict these regulations' guiding principles.
- Electronically save all of the documents exchanged, the data and the decisions taken on the corporate intranet, in the section for collaborative environments for International Affairs (referred to below as the IA Site).
- When the lobbying has been carried out in the manner described in section 3.3(2) of these regulations, it should be electronically attached to the "List of Abertis's collaborating organisations" available on the IA Site.



- When the lobbying has been carried out in the manner described in section 3.3(3) of these regulations, it should be electronically attached to the "List of Abertis lobbying service providers", which is also available on the IA Site, and the lobbying services agreement should be attached as a PDF document.
- Inform the interest groups when they require information, in good time, clearly, truthfully and exactly. However, if the information to be communicated may infringe the applicable legislation and/or involve transfer of confidential information, the Affected Persons may reserve the right not to accept the request, in which case they must inform the interest groups of the reasons for the refusal. The information provided or the refusal made must be saved on the IA Site.
- Immediately terminate lobbying service provision agreements and/or cease being a member of associations, foundations, NGOs, corporations and chambers of commerce when knowledge is received of them having been given a criminal conviction in a final judgment handed down by the pertinent courts, whether they are organisations and/or individuals that are part of their management bodies, who have not been dismissed from their positions after the final judgment has been made known.

3.5. Supervisory measures

The supervisory measures for lobbying are as follows:

- Abertis's directors and CEO must inform Abertis Infraestructuras, S.A.'s Board of Directors of the commencement of any of the forms of lobbying described in these regulations, as well as their progress and results. All this must be recorded in the relevant minutes of the Board of Directors.
- Abertis's managers who are part of the Abertis Group's Management Committee must inform the committee of the commencement of any of the forms of lobbying, performed by any member of Abertis's management team or through employees involved in the relevant management, as well as the progress and results. All this must be recorded in the relevant minutes of the Group's Management Committee.
- The rest of Abertis's employees (including Abertis managers who are not on the Management Committee) must inform their superiors electronically of the progress and results and also make available the minutes of all of the meetings held, which must contain at least the following: the purpose of the meeting, and the date, time, place and positions of the persons attending. These must be electronically saved on the IA Site.



- When Affected Persons contract suppliers to provide lobbying services or are members of associations, foundations, NGOs, corporations or chambers of commerce, it is necessary to request and verify the following information:
 - Their code of conduct, which must be in line with these regulations.
 - Registration with the pertinent institution, if so required by the applicable legislation.
 - Name and positions of the members of the management body.

3.6. Transitional system

All lobbying activities being performed prior to the date of publication of these regulations must be electronically reported on the IA Site.

4. File

All related supporting documents must be archived for a minimum period of 10 years in electronic format. In all cases, the archive must ensure the integrity and correct reading of the data, and that it is impossible to manipulate them, and that they are adequately preserved and able to be located.

5. Referenced documents

- *The Abertis Group's Code of Ethics.*
- *The Abertis Group's Corporate Reputation Policy.*
- *Prevention of the Corruption at Abertis Group Norm.*
- *Institutional Relations Activities Group Norm.*

6. Record of Changes

Ver	Date	Changes	Sections Affected
1.0	12/12/2016	New Draft	All

Advocacy Lobby_v1

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Approved by: General Counsel & Chief Compliance Officer

