

FERROVIAL SE TAX STRATEGY TOWARDS UK TAXATION

Introduction

This tax strategy has been prepared and published in accordance with paragraph 19 (2), Schedule 19, Finance Act 2016, on behalf of all UK tax resident entities in the Ferrovial UK Group. This tax strategy, which applies for the financial year ended 31 December 2024 and subsequent financial years, has been reviewed and agreed by the Board of Directors of Ferrovial SE and will remain in effect until there are any amendments by the Board of Directors.

Ferrovial Tax Arrangements

The Ferrovial UK Group is committed to the management of tax risk and ensuring compliance with all applicable statutory obligations in relation to UK tax law and the alignment of risk management and governance arrangements to the wider Ferrovial Group's tax code of conduct¹ and guidance².

Approach to tax governance and risk management

The Ferrovial UK Group's tax contribution extends beyond the calculation, collection and payment of corporation tax to include a wide range of taxes and levies (including Value Added Tax, customs and excise duties, employment, fuels, insurances, social security and the collection of income tax). There are also several UK subsidiaries that are engaged in overseas portfolio investments deriving mainly tax-exempt income and gains for UK Corporate income tax purposes.

The Ferrovial UK Group is committed to complying with all applicable tax laws and obligations and maintaining a professional and cooperative relationship with regulatory bodies in relation to tax matters. Where the interpretation or application of tax rules is unclear, the Ferrovial UK Group's approach is to seek clarification from HMRC.

The Ferrovial UK Group does not have any appetite in respect of taxation risk and seeks to manage risk and compliance with legal requirements as part of an end to end tax management process. This includes ensuring payment of the right amount of tax at the right time while also promoting measures to prevent and mitigate significant tax risks.

¹ <https://static.ferrovial.com/wp-content/uploads/2024/01/31092637/003-tax-compliance-and-best-tax-practices-policy.pdf>

² <https://informeannualintegrado2023.ferrovial.com/en/>

The Ferrovial UK Group operates a system of tax risk assessment and controls as a component of its overall business risk management and internal control framework supported by the wider Ferrovial Group's internal audit team.

The ultimate responsibility for the Ferrovial UK Group's taxation strategy is set at the Boards of Directors of Ferrovial SE level and permeates the entire organisation. Executive responsibility for compliance with UK taxation obligations matters, and for fulfilling compliance requirements, rests with the Chief Financial Officers of the Ferrovial UK Group businesses.

The Ferrovial UK Group engages sufficient resources to cover tax function activities to provide high-quality and solution-driven tax advice within the business. The Ferrovial Group's in-house tax functions are composed of high quality and performing teams who regularly attend internal and external training sessions (including tax updates and discussions with the tax authorities and other agents) and are supported by external advisors as and when appropriate.

Attitude to tax planning and level of risk

The Ferrovial UK Group's approach to tax risk management is aligned with the tax commitments and guidelines and with the tax code of conduct of the wider Ferrovial Group.

The management of the Ferrovial UK Group's taxation affairs is aligned with the Ferrovial Group's strategic goals, business objectives and commercial transactions while always operating in accordance with the law.

In managing tax risk, the Ferrovial UK Group ensures compliance with UK obligations and legal requirements in a manner which ensures payment of the right amount of tax by deploying all available means to provide a high degree of tax certainty (including APAs and administrative rulings).

As part of its business and commercial operations, the Ferrovial UK Group's tax planning is focused on supporting our commercial activities in compliance with all applicable laws and regulations to ensure that tax liabilities properly reflect commercial operations. We utilise available tax reliefs, incentives and exemptions but do not structure artificial tax-driven transactions.

Relationship with HMRC

The Ferrovial UK Group seeks to comply with all its tax obligations in an open, honest, transparent manner, creating and maintaining mutual trust with tax and other regulatory authorities.

The Ferrovial UK Group is committed to providing information and documentation requested by tax authorities as quickly and as completely as possible. Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as is reasonably practicable after they are identified.

December 2024