FORUM POUR L'INVESTISSEMENT RESPONSABLE

SAY ON CLIMATE assessment

Spain | ferrovial | 2025

Transparency rating	PERFORMANCE SCORING	NARRATIVE SCORING	TREND SCORING
↑ 50% alignment with FIR recommendations	38.5%	A **B** C D E	=

Compared with last year, Ferrovial's climate plan has moved in the right direction**. The company has introduced new targets across the three scopes with 2020 as the reference year (vs. 2009 in 2024). These targets have just been certified by SBTi on a 1.5°C trajectory. Nevertheless, the reduction targets for 2030 exclude several relevant emission categories including capital goods, investments (around 10% of emissions) and the use of products sold, even though the company previously included this last category in the scope 3 calculation and its targets (13% of overall emissions in 2023).** The company has set an ambitious target for 2025 for the alignment of its CAPEX with the taxonomy, but **does not disclose the amount of investment that will enable it to meet the actions in the action plan it has set. Moreover, the actions in this plan are not detailed enough**. Finally, with regard to remuneration, the company is no longer as transparent as it was last year about the weighting of criteria. While we welcome the company's effort to present a Say on Climate, we encourage it to go further in terms of the transparency and ambition of its climate strategy.

As early as 2021, the **French Forum for Responsible Investment (FIR)** has called for the widespread adoption of stringent Say on Climate (SOC). After a first edition on 2022, the FIR signed again an agreement with 48 French and European signatories, encouraging the development of SOCs. Meanwhile, in 2022, FIR began analyzing the climate plans of French companies that submit them to shareholder vote. After joining forces in 2023, **FIR and ADEME** extended their partnership in 2024 by teaming up **with Ethos and the World Benchmarking Alliance**. Again this year, these players will be working together to study the climate plans of **European companies** submitted to a consultative vote by shareholders at their general meetings in 2025.

In 2022, FIR had published fact sheets assessing the extent to which French companies' climate strategies were in line with **its recommendations**. In 2023, as part of the partnership with ADEME, these analysis reports will be enriched **with the ACT assessment tool** to measure the contribution of corporate strategies and actions to the mitigation objectives of the Paris Agreement.

Analyses will be published as they become available, ahead of their annual general meetings.

As in previous years, FIR wishes to salute the efforts of companies that contribute to improving shareholder dialogue, and encourages them to reiterate the Say on Climate exercise annually.

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Ferrovial

50% alignment with FIR recommendations

Ambition Net Zero 2050

Ambition of carbon neutrality for all emissions by 2050 or earlier

▷ *Lack of precision on the perimeter included in this ambition*

▷ *The company plans to offset 20% of its scopes 1 and 2 emissions by 2030*

Reference scenario(s) used

1,5°C trajectory validated by the SBTi for the three scopes

Current GHG emissions (*2024 vs 2023*)

SCOPE 1	SCOPE 2	SCOPE 3
306,884 tCO2eq in 2024 (vs 2023 recalculated: 323,154)	***Rental based**: 68,654 (vs 64,706) ;*	*1,716,592 (vs 2023 recalculated: 1,684,645)*
15% (-5% vs 2023)	***Market based**: 28,643 (vs 27,459)*	*84% (+2% vs 2023)*
	1% (+4% vs 2023 market based)	

❍*Exclusion of the category Use of Sold products from Scope 3 this year. Recalculation following a change in methodology decided by the company to be based on the recommendations of the GHG Protocol guidelines on Scope 3 : exclusion of customer related emissions due to the Cintra and airport concessions. This category represented 13% of the global emissions in 2023.*

Short-term GHG emissions reduction target (2030)

Lack of information

Medium-term GHG emissions reduction target (2040)

Reduction of -42% by 2030 on scopes 1 & 2 compared with 2020 (current performance: -35.78%)

Reduction of -25% by 2030 on scopes 3 vs 2020 (current performance: -18.08%)*

**Including goods and services purchased, upstream transport, waste generated in operations and petrol and energy.*

Positive trend with updated targets now based on a much closer reference year (2020 vs 2009 before)

▷ *Scope 3 targets do not include several categories of emissions (including investments and capital goods) that account for 10% of overall emissions*

▷*As a reminder, the calculation of scope 3 emissions does not take into account the Use of sold products category.*

▷*The company plans to offset 20% of its scopes 1 and 2 emissions by 2030*

Long-term GHG emissions reduction target (2050)

90% reduction by 2050 for the 3 scopes in absolute terms

▷*Important reduction needed to meet the targets between 2030 and 2050*

▷*As a reminder, the calculation of scope 3 emissions does not take into account the Use of sold products category.*

Action plan measures

Scopes 1 and 2 :

Implementation of the Deep Decarbonization Path (DDP) to achieve the 2030 targets:

Electrification of the vehicle fleet (42% reduction in fleet emissions), reduction in emissions associated with the construction of machinery through energy efficiency measures, reduction in emissions from asphalt plants, exploration of technological alternatives for low-carbon heavy machinery, use of fewer polluting fuels, consumption of 100% renewable electricity (in 2025), in 2024 72.75% ▷ *Difficult to understand how to achieve the target set for 1 year from now*

▷*Measures are not detailed and are not quantified so that the contribution of each can be understood, except for the vehicle fleet and renewable electricity*

Scope 3 :

Reducing integrated carbon in the supply chain: working with suppliers to promote low-carbon products (particularly cement and concrete), developing new raw materials with lower emissions (recycled materials), purchasing low-carbon "Green Purchasing Catalog" goods and services; using design methods to reduce the use of carbon-intensive raw materials; promoting local sourcing: reducing upstream transport and product distribution. Reducing fuel and energy use; Introducing a Circular Economy Plan: increasing recycling and reuse; Reducing waste generated by operations.

▷*Part of each action's contribution to the reduction targets is not explicit*

▷*No time horizon information on the action plan after 2030*

CAPEX / OPEX investment alignment

Improvement in CAPEX aligned with taxonomy : 42.9% in 2024 vs. 16% in 2023 and target of 80% in 2025 (out of 42.6% eligible CAPEX)

The company states that it is working on more granular information on the allocation of its investments to its sustainability strategy.

❍ *Ambitious targets (CAPEX must almost double in one year)*

❍ *Discrepancy between the % of aligned CAPEX published on page 78 (35.6%) and page 55 (42.9%) of the integrated 2024 report*

▷ *No clear, quantified information on medium- and long-term investment in decarbonisation*

Remuneration

Chairman:

-Variable annual remuneration (for 2024): 20% based on 5 "qualitative and ESG" criteria: one of the criteria concerns governance, within which three objectives are cited, including a 1.2% reduction in CO2 emissions in absolute terms on scopes 1&2 compared with 2023.

▷ *In 2023, the five criteria making up the 20% were weighted, but this is no longer the case; the target of reducing emissions in scopes 1 & 2 by 1.2% compared with 2023 seems low.*

▷ *Emissions reduction criterion present but totally diluted*

Long-term remuneration: ESG criteria: 10% of long-term objectives, one criterion out of three on reducing GHG emissions

▷ *carbon criteria not precise and diluted*

Chief Executive Officer:

-Variable annual remuneration (for 2024): 30% based on 6 "qualitative and ESG" criteria: one of the criteria concerns the "promotion of innovation, sustainability and CSR", within which three objectives are cited, including a 1.2% reduction in emissions in absolute terms compared with 2023.

▷ *In 2023, the six criteria making up the 30% were weighted; this is no longer the case.*

▷ *Emissions reduction criterion present but totally diluted; the emissions reduction target for scopes 1 & 2 of 1.2% compared to 2023 seems low*

Long-term remuneration: 10% on ESG criteria, one criterion out of three on reducing GHG emissions

▷ *In 2023, the emissions reduction target was disclosed, this is no longer the case* ▷ *carbon criterion not precise and diluted*

Annual consultative vote on implementation

Annual consultative vote on the climate report

Consultative vote on strategy every three years

No vote on strategy every three years

Caption:

❍ Indicates that all the criteria for obtaining all the points have been met, but suggests improvements in terms of transparency

▷ Failure to obtain full points

ferrovial

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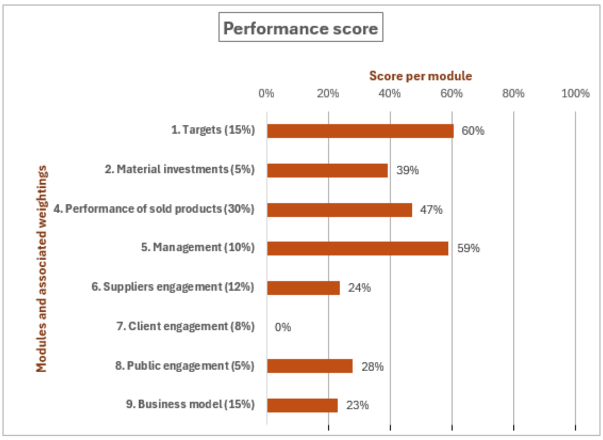
ACT ACCELERATE ® CLIMATE TRANSITION

PERFORMANCE SCORE	NARRATIVE SCORE	TREND SCORE
38.5%	A **B** C D E	=

ACT Generic Methodology



The score for each module is weighted (see slide 7) and results in a performance score.

Company's categorization

1. Transitioning in a credible and robust way

2a. Committed company

2b. Performing company

3. Not transitioning in a credible and robust way

**The company's categorization explanations are available in slide 6*

Transition plan's assessment

Performance score

1. Targets : Through its renewed SBTi targets, Ferrovial increased its ambition regarding the reduction of scope 1 and 2 emissions (-42% by 2030 with a 2020 baseline, instead of -35.3% with a 2009 baseline) and material upstream scope 3 emissions (-25% by 2030 with a 2020 baseline). However, Ferrovial excluded this year the significant emissions from the use of sold products (scope 3 category 11) from airports and toll roads from its targets and reporting.

2. Material investment: Ferrovial past scope 1 and 2 emissions reductions are aligned with a 1.5°C pathway according to the ACT methodology. In addition, 35.6% of the company's CAPEX is aligned with sustainable activities (EU taxonomy).

3. Immaterial investment : Not applicable to Ferrovial.

4. Sold product performance: Ferrovial reports various planned interventions on its supply chain aiming at decarbonization. However, Ferrovial does not provide sufficient details on the expected reductions and investments associated with these measures. In addition, significant emissions are locked-in due to the company's business model, i.e. long-term infrastructures construction and management.

5. Management : Oversight, management incentives, transition plan and climate scenario testing are in place for a low-carbon transition, but there is a lack of climate change expertise within the executive management.

6/7. Value chain engagement : Ferrovial has no strategy to require suppliers to reduce their emissions, but engagement activities with suppliers is part of the company's scope 3 decarbonization levers. Regarding client engagement, Ferrovial reports no strategy or activities to reduce their emissions and influence their choices.

8. Policy engagement : Ferrovial has a publicly available policy regarding lobbying and engagement. However, Ferrovial lacks a comprehensive reporting on its engagement activities and process in case of climate-negative positions from supported associations, coalitions and thinktanks.

9. Business model : 34.1% of the company's turnover is aligned with the EU taxonomy and increasing from past years. However, the company does not develop new low-carbon business models and does not plan to phase-out from intensive sectors such as airports and toll roads.

Transition plan's consistency (narrative score):

- Ferrovial's past and present actions demonstrate that the company has a climate ambition, but additional efforts are still needed to achieve climate targets.

Trend score :

- Ferrovial improved in some areas with its update climate strategy, but significant issues and uncertainties remain.

Areas of improvements :

- The company should include again downstream scope 3 emissions from the use of sold products where most of its emissions occur in its targets
- The company should disclose the details regarding key actions and interventions such as the expected emissions reductions and the investments associated.
- The company should engage with its clients to influence them to reduce their emissions.
- The company should create new business models aligned with a low-carbon transition.

FORUM POUR L'INVESTISSEMENT RESPONSABLE

Change in rating compared with analysis of FIR *Say On Climate* 2024	↑	→	↓
	Increase	Stagnation	Drop

SAY ON CLIMATE 2025 evaluation grid

based on follow-up to FIR recommendations

	🟢 (green)	🟠 (orange)	🔴 (red)
Ambition net zero 2050	If the ambition of contributing to carbon neutrality by 2050 is declared and clear explanations are given on how to achieve this neutrality The level of negative emissions is limited	The ambition to contribute to carbon neutrality by 2050 is declared and the explanations on how to achieve this neutrality are clear. The level of negative emissions is high	A declared ambition, but very little clarity on how the company intends to achieve carbon neutrality (no long-term reduction targets, targets set are not very credible, heavy reliance on offsetting, etc.) or no declared ambition to be carbon neutral by 2050
Reference scenarios used	The company positions its climate strategy in relation to a 1.5°C warming scenario for all scopes	The company uses a reference scenario limiting warming to between 2°C and 1.5°C, or 1.5°C for only part of its scope	No reference scenario explicitly mentioned or scenario(s) not used to define the strategy
Current GHG emissions	Disclosure of absolute greenhouse gas emissions; breakdown by scope; downward trend in past emissions (over at least 3 years) in line with company targets	Insufficiently detailed disclosure of absolute greenhouse gas emissions and/or lack of substantiated justification for the absolute increase in emissions over the last 3 years	No public data or little or no justification for the upward trend in emissions intensity and absolute values
Short-term GHG emissions reduction target	If the quantified emission reduction targets before 2030, expressed at least in absolute terms, cover the 3 scopes and are set in relation to the company's 1.5°C alignment trajectory. This trajectory has been scientifically validated.	If the quantified emission reduction targets before 2030 do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory of between 2°C and 1.5°C	No quantified target for reducing emissions in the short term, or targets that are not very ambitious in the short term (reference year too far in the past, no absolute reduction, not scientifically validated, etc.)
Medium-term GHG emissions reduction target	If the quantified emission reduction targets between 2030 and 2040, expressed at least in absolute terms, cover the 3 scopes and respect the alignment with a 1.5°C scenario. This trajectory has been scientifically validated	If the quantified emissions reduction targets between 2030 and 2040 do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory of between 2°C and 1.5°C	No quantified target for reducing emissions in the medium term, or targets that are not very ambitious in the medium term (reference year too far in the past, no absolute reduction, not scientifically validated, etc.)
Long-term GHG emissions reduction target	If the quantified emission reduction targets for 2050 or earlier, expressed at least in absolute terms, cover the 3 scopes and are set in relation to the company's 1.5°C alignment trajectory. This trajectory has been scientifically validated	If the quantified emission reduction targets for 2050 or earlier do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory of between 2°C and 1.5°C	No quantified target for reducing emissions in the long term, or targets that are not very ambitious in the long term (reference year too far in the past, no absolute reduction, not scientifically validated, etc.)
Action plan measures	Detailed measures for each scope of the company with a sufficient level of detail, including short- and medium-term figures, to enable the alignment of this plan with the objectives set to be assessed.	Detailed measures for each scope of the company, but insufficient detail to assess the level of alignment with the objectives set (lack of quantified measures in particular)	Measures with little or no detail
Investment alignment (OPEX / CAPEX)	Details the proportion of investments (OPEX and CAPEX) that contribute to meeting short- and medium-term targets, and explains how these investments enable the targets to be met	The information provided on the contribution of investments to the achievement of objectives does not allow an understanding of how the company achieves the objectives set	No investments contributing to the achievement of explicit objectives
Remuneration	All variable parts of the remuneration of corporate officers include at least one criterion that assesses the achievement of greenhouse gas emission reduction targets. The % of remuneration determined by this criterion is published; it represents a significant proportion (10% or more)	At least part of the variable part of the remuneration of corporate officers is covered by a non-diluted criterion for reducing greenhouse gas emissions in line with the reduction trajectory defined by the company	The criterion included in the remuneration of corporate officers relating to the reduction in greenhouse gas emissions is diluted, or does not follow the reduction trajectory defined by the company. or No criteria relating to the reduction of greenhouse gas emissions are included in executive remuneration
Annual consultation on implementation	The company undertakes to consult shareholders annually on the implementation of its climate change strategy	The company is committed to consult shareholders on the implementation of its climate strategy over the coming years	The company does not undertake to consult shareholders on the implementation of its climate strategy
Consultation on strategy every three years	The company undertakes to consult shareholders on its climate strategy at least every three years	The company undertakes to consult shareholders on its climate strategy over the coming years	The company makes no commitment to consult shareholders on its climate strategy

Weighting: the two final criteria correlated with the vote are given a weighting of 0.5 each, while the other nine retain a weighting of 1.

ACT's methodology

→IT'S TIME TO ACT

WHAT IS ACT ?

A joint voluntary initiative of the UNFCCC secretariat Global Climate Agenda.

WHY ACT ?

Drive climate action by companies and align their strategies with low-carbon pathways.

HOW DOES ACT WORK ?

ACT provides sectoral methodologies as an accountability framework to assess how companies' strategies and actions contribute to the Paris mitigation goals.

FRAMEWORK

1 What is the company planning to do?

2 How is the company planning to get there?

3 What is the company doing at present?

4 What has the company done in the recent past?

5 How do all of these plans and actions fit together?

COMMITMENT

TRANSITION PLAN

PRESENT

LEGACY

CONSISTENCY

INNOVATIVE : ACT is an integrated, long-term approach.

QUANTITATIVE : it measures past, present and future performance

TARGETED: on the main sources of emissions in the value chain

SECTORAL: addressing issues specific to the transition of each sector

TRANSPARENT: through third-party evaluation

ACT ASSESSMENT

For what purpose?
Credibly measure the contribution to the net-zero objective in relation to sectoral low-carbon trajectories.

For whom?
Companies with science-based objectives and/or a transition plan ready for assessment

20

PERFORMANCE SCORE
Transition alignment metrics
1 - 20

A

NARRATIVE SCORE
Analysis of overall consistency
A - E

+

TREND SCORE
Forecast of future changes
+ = -

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ACT assessment categorization

The purpose of this categorization is to leverage on the ACT assessment methodologies, that provide an in-depth assessment of strengths and weaknesses of company's transition plans and propose a categorization framework providing a clear signal on a company's situation. It is willing to address the following question "what is a good ACT score?".
All the information on this paper is to be found [here.]

The categorization framework proposed is the following:

1. Companies transitioning in a credible and robust way;
2. Companies partially satisfactory on one or two of the following aspects:
   a. Companies "committed" that are ambitious enough but have not yet demonstrated the performance;
   b. Companies "performing" that have demonstrated good GHG trajectory at the moment but haven't provide aligned ambitions.
3. Companies **not** transitioning in an enough credible and robust way.

The categorization of companies proposed in this paper is based on thresholds on the global performance score, complemented by safeguards on relevant sub-module performance score levels, on narrative and on trend scores. The categorization framework is sum-up in the table below :

Category	1. Transitioning in a credible and robust way	2a. Committed	2b. Performing	3. Not transitioning in a credible and robust way[2]
Criteria application	Criteria blocks are cumulative			Criteria blocks are alternative[3]
Global performance score	≥12/20	No threshold.		Global < 12/20
Module performance scores	Module 1 ≥ 75% Modules 2+4 ≥ 60% *Where relevant:* Modules 6+7≥ 50%	Module 1 ≥ 75%	Modules 2+4 ≥ 60%	AND Module 1 < 75% AND Modules 2+4 < 60%
Narrative score	≥ C global AND ≥ C on consistency and credibility AND reputation			< C global OR <C on consistency and credibility OR reputation
Trend score	= or +			-

ACT Methodology

Generic

The full ACT methodology for the Generic sector can be found on our website. The detailed assessment is summarized in a score based on three criteria: performance, overall consistency and trend. It takes the following form:

- **Performance**: number between 1 and 20
- **Evaluation (consistency)**: letter between A and E
- **Trend**: + (improvement), - (deterioration), = (stable)

Module	Indicateur
1. Targets	1.1 Alignment of scope 1+2 emissions reduction targets
	1.2 Alignment of upstream scope 3 emissions reduction targets
	1.3 Alignment of downstream scope 3 emissions reduction targets
	1.4 Time horizon of targets
	1.5 Achievement of previous and current targets
2. Material investment	2.1 Trend in past emissions intensity from material investment
	2.2 Trend in future emissions intensity from material investment
	2.3 Share of Low Carbon CAPEX
	2.4 Locked-in emissions from own fleet and buildings
4. Sold product performance	4.1 Product-specific interventions
	4.2 Trend in past product / service specific performance
	4.3 Locked-in emissions from sold products
	4.4 Sub-contracted transport service performance
5. Management	5.1 Oversight of climate change issues
	5.2 Climate change oversight capability
	5.3 Low-carbon transition plan
	5.4 Climate change management incentives
	5.5 Climate change scenario testing
6. Supplier engagement	6.1 Strategy to influence suppliers to reduce their GHG emissions
	6.2 Activities to influence suppliers to reduce their GHG emissions
7. Client engagement	7.1 Strategy to influence client behaviour to reduce their GHG emissions
	7.2 Activities to influence customer behaviour to reduce their ghg emissions
8. Policy engagement	8.1 Company policy on engagement with associations, alliances, coalitions or thinktanks
	8.2 Associations, alliances, coalitions and thinktanks supported do not have climate-negative activities or positions
	8.3 Position on significant climate policies
	8.4 Collaboration with local public authorities
9. Business model	9.1 Revenue from low-carbon products and/or services
	9.2 Changes to business models
	9.3 Share of product/service sales used in client low-carbon products/services

Narrative scoring

1. Business model and strategy
2. Consistency and credibility
3. Reputation
4. Risks

Trend scoring

1. Probability of emissions' evolution
2. Evolution of business model and strategy

Disclaimer:

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