



Servicios Ciudadanos

---

## INSTRUMENTAL REGULATIONS

FCC-NI-01.7\_Authorisation Thresholds

Version: 7.0  
Date: May 2026

## Content

1.	Purpose and scope of application .....	4
2.	Definitions. ....	4
3.	Authorisation thresholds by Business Area. ....	4
4.	Types of powers for approving Transactions. ....	4
5.	Additional specific provisions.....	5
6.	Flexibility. ....	5
	Annex I. Approval Threshold Tables. ....	6

Version	Date	Person responsible	Description of the change
1.0	December 2011	Administration / HR / Corporate General Management	First version
2.0	March 2014	Administration / HR / Procurement Department	Adaptation to the new organisational structure
3.0	March 2015	Administration / HR / Procurement Department	Adaptation to the new organisational structure
4.0	July 2016	Administration / HR / Procurement Department	Adaptation to the new organisational structure
5.0	September 2020	Administration / HR / Procurement Department	Adaptation to the new organisational structure
6.0	April 2024	Administration / HR / Procurement Department	Update to MA thresholds
7.0	May 2026	Administration / HR / Procurement Department	Update to MA and AQ thresholds

## 1. Purpose and scope of application

This Policy set out and standardise the criteria, processes and approval thresholds required for requests relating to: (i) procurement needs<sup>(\*)</sup>; (ii) comparative analyses; (iii) contracts and/or orders; (iv) incoming goods; and (v) invoices (hereinafter, the “Transactions”). Compliance with this Policy is mandatory, irrespective of the means used to carry out such Transactions.

It applies to all companies, subsidiaries, temporary joint ventures or other types of association in which the FCC Group holds, directly or indirectly, a stake of more than 50% or, failing that, where it has been entrusted with their management.

It supplements and/or further specifies both Section 50 “Purchasing and relationships with suppliers” and Section 70 “Delegation of authority” of the General Rules Manual (GRM). For **investment** transactions, this Policy also supplements the requirements set out in Section 30 “Investments” of the GRM.

*(\*) Procurement Requirement Request: internal process for approving and notifying the Procurement Department of the need to procure goods or engage services (in accordance with the Procurement Policy).*

## 2. Definitions.

- **Requestor:** first person to report (enter) the Transaction in SAP or to process it by any other means (e.g. email or Microsoft SharePoint), for subsequent approval.
- **Approver:** person authorised by the Company to approve Transactions.

## 3. Authorisation thresholds by Business Area.

When setting the thresholds, account is taken of the specific characteristics of the activities carried out at each Business Unit. Transactions must be approved by the hierarchical superiors of the requestor, up to the individual vested with sufficient authority in accordance with the applicable table (see Annex I “Approval Threshold Tables”), and by at least two individuals. Where, due to organisational structure, it is not possible to have two approvers, the requestor may be considered as an approver.

## 4. Types of powers for approving Transactions.

Two types of authority exist for approving Transactions:

- Internal authority:** this authority is inherently granted to all FCC Group employees who have a user account in SAP with the requisite role enabling them to approve Transactions within the system, up to the threshold applicable to them (in accordance with Annex I). Additionally, this authority may be granted to an employee by authorisation from a hierarchical superior with at least “Executive Level 3”, who must notify Internal Audit accordingly.
- External authority:** granted by means of a power of attorney in accordance with Section 70 of the GRM.

Depending on the type of Transaction, one or the other Authority (or both) may apply:

- **Procurement Requirement:** Internal Authority, in accordance with the Procurement Policy.
- **Orders:** Up to €25,000: Internal Authority. Above this amount: External Authority (at least one of the approvers).
- **Contracts:** External Authority (2 signatures).
- **invoices:** Up to €25,000: Internal Authority. Above this amount: External Authority (at least one of the approvers).

## 5. Additional specific provisions.

- a. **Signing of contracts:** Contracts must be signed by at least two authorised signatories (External Authority). At least one of them must have sufficient authority to cover the contract amount, in accordance with the applicable table set out in Annex I.
- b. **Receipt of goods, services and works:** The user shall take delivery or grant acceptance, once it has been confirmed that the goods have been received, the service has been performed or the works have been completed satisfactorily (whether verified by that user or by another person).

## 6. Flexibility.

- a. **Further approvals:** Transactions which, for any reason, must be subject to further approval by other hierarchical superiors shall be handled in accordance with the requirements established by the relevant Business Unit. Such further approvals shall be determined specifically for those transactions and shall be the responsibility of the requestor. Such further approvals shall be requested by email (or by any other means outside SAP) and shall be recorded in SAP, where applicable, by the requestor.
- b. **Delegation of powers:** In situations where an approver is temporarily unavailable, they may delegate their approval authority on a temporary basis, subject to prior approval by their hierarchical superior and notification to the designated person.



## Annex I. Approval Threshold Tables.

**Table 1: Infrastructures. Authorisation levels for transaction approval.**

PROFESSIONAL CATEGORY	AMOUNT (€)
CEO	NO LIMIT
MANAGING DIRECTOR	NO LIMIT
REGIONAL MANAGER / AREA MANAGER (LEVEL EQUIVALENT TO THE AREA MANAGER)	UP TO 6,000,000
LOCAL OFFICE MANAGER / EQUIVALENT AREA MANAGER / DEPARTMENT MANAGER	UP TO 1,000,000
DEPARTMENT MANAGER / HEADS OF DEPARTMENT / HEAD OF SITE DEPARTMENT	UP TO 200,000
SITE MANAGERS	UP TO 5,000

**Table 2: Environmental services: Authorisation levels for transaction approval.**

PROFESSIONAL CATEGORY	AMOUNT (€)
CEO	NO LIMIT
MANAGING DIRECTOR	UP TO 10,000,000
REGIONAL MANAGER / AREA MANAGER (LEVEL EQUIVALENT TO THE AREA MANAGER)	UP TO 2,500,000
LOCAL OFFICE MANAGER / EQUIVALENT AREA MANAGER	UP TO 500,000
HEADS OF DEPARTMENT/HEAD OF THE PRODUCTION DEPARTMENT	UP TO 50,000
HEADS OF SERVICE	UP TO 3,000

Table 3: Aqualia. Authorisation levels for transaction approval.

FCC AQUALIA CENTRAL SERVICES	
PROFESSIONAL CATEGORY	AMOUNT (€) (upper threshold level)
CEO	NO LIMIT
AREA MANAGER	UP TO 25,000
HEAD OF DEPARTMENT	UP TO 5,000

FCC AQUALIA NATIONAL	
POSITION	AMOUNT (€) (upper threshold level)
CEO	NO LIMIT
SPAIN AREA MANAGER	UP TO 5,000,000
REGIONAL MANAGER	UP TO 1,000,000
LOCAL OFFICE MANAGER	UP TO 50,000
DEPARTMENT MANAGER	UP TO 25,000
MANAGEMENT UNIT HEAD / HEAD OF DEPARTMENT	UP TO 5,000
HEAD OF SERVICE / SITE MANAGER	UP TO 1,000

FCC AQUALIA INTERNATIONAL	
POSITION	AMOUNT (€) (upper threshold level)
CEO	NO LIMIT
AREA MANAGER	UP TO 5,000,000
REGIONAL MANAGER	UP TO 1,000,000
COUNTRY MANAGER	UP TO 250,000
PROJECT MANAGER / HEAD OF MANAGEMENT UNIT / DEPARTMENT MANAGER	UP TO 25,000
HEAD OF SERVICE / SITE MANAGER	UP TO 1,000

**Table 4: Central Services. Authorisation levels for transaction approval.**

PROFESSIONAL CATEGORY	AMOUNT (€)
CEO	NO LIMIT
MANAGING DIRECTOR	UP TO 5,000,000
AREA MANAGER	UP TO 50,000
DEPARTMENT/SUB-AREA MANAGER	UP TO 5,000
HEADS OF DEPARTMENT/HEAD OF THE PRODUCTION DEPARTMENT	N/A
HEADS OF SERVICE	N/A

**Specific notes:**

Specific approval workflows may be defined for special activities.