

CIRCULAR ECONOMY POLICY

The Board of Directors at Sacyr, S.A. (“**Sacyr**”), as part of their general and non-delegable duties to determine the company’s policies and general strategies and following the review and proposal on the part of the Commission responsible, has approved this *Circular Economy Policy* (hereinafter, the “**Policy**”).

The aim of this Policy, aimed at all stakeholders, is to define and establish the principles and criteria that govern actions regarding Circular Economy.

1. Purpose

The increase in demand for resources at a global level in recent decades has caused a notable acceleration in their consumption and it is essential to overcome the classical linear and unsustainable model based on extracting, producing, using and disposing, giving way to the model of reducing, reusing and recycle.

The new circular model seeks the maximum use of resources and the least possible generation of waste, keeping the materials and derived products in circular processes, which allow them to be reintegrated into the value chain at the end of their useful life as consumer goods.

Sacyr, aware of its responsibility and that the transition to the circular economy will only be possible thanks to the involvement of all society's agents, wants to actively and decisively contribute to a sustainable future, minimizing the environmental impact of all its activities and promoting as many actions as are available for this purpose.

With this commitment, Sacyr demonstrates its faithfulness to integrating this circular economy model to achieve sustainable growth by incorporating circularity across the organization, in all its activities and business areas.

2. Scope of Application

This *Policy* applies to Sacyr and to all the companies in its Group. For purposes of this Policy, the SACYR Group is to be understood to comprise (i) all subsidiary or majority-owned companies effectively controlled by Sacyr, S.A. directly or indirectly, irrespective of their geographical location and (ii) the Fundación Sacyr [Sacyr Foundation]. Therefore, all mentions of the Sacyr Group contained in this Policy are to be understood to refer to all the above companies and the Foundation.

It does not apply to subsidiaries or companies in which a minority interest is held that are not effectively controlled by Sacyr directly or indirectly. These will have their own tax policies approved by their own competent bodies. Sacyr will encourage investee

companies that are not part of the Group, particularly Sacyr's tax consolidation group, to implement similar reporting procedures.

3. General principles

To ensure the implementation of this commitment with Circular Economy, Sacyr and the other companies that belong to its Group shall follow the guidelines contained in the general principles below:

- a) Integrate the circular economy in the corporate strategy and in the decision-making process.
- b) Effectively apply the principle of waste hierarchy: reducing the generation of hazardous and non-hazardous waste, increasing reuse and recycling, promoting recovery and avoiding disposal.
- c) Reduce the use of non-renewable natural resources and reincorporate in the production cycle the materials contained in the waste as secondary raw materials.
- d) Actively promote the use of materials of recycled origin.
- e) Promote the acquisition of materials and products that can be reused or recycled at the end of their use.
- f) Promote eco-design to reduce environmental impact in all stages of the product or service from the perspective of the life cycle.
- g) Promote efficiency in the use of resources, process optimization, commitment to low-emission energy resources and the application of more efficient technologies.
- h) Effectively apply the principle of the hierarchy of waste: reduce generation, increase reuse and recycling, promote waste recovery and avoid elimination.
- i) Promote preventive management of food waste.
- j) Promote and support the innovation of processes that boost circular economy.
- k) Promote awareness, consciousness-raising and training initiatives for our stakeholders in the field of circular economy.
- l) Encourage our collaborators to adopt actions consistent with this Policy.
- m) Encourage active and continuous communication about Sacyr's actions regarding the circular economy.
- n) Manage waste according to domestic law, always in collaboration with authorized waste management companies and ensuring proper waste treatment.



- o) Promote voluntary adherence to collaboration agreements and alliances, of public or private nature, in order to assume commitments and define actions in line with the objectives of this Policy.

- p) Comply with current legislation in all matters related to the circular economy in the countries and territories in which Sacyr operates, adopting also international commitments, standards and guidelines where there is insufficient legal development.

This *Circular Economy Policy* was approved by Sacyr's Board of Directors on December 20, 2021 and was later modified on December 22, 2022.