



## DIVERSITY, EQUALITY AND INCLUSION POLICY

The Board of Directors of Sacyr, S.A. (“**Sacyr**”), within the framework of its general, non-delegable capacity to determine the company’s overall policies and strategies, and upon the review and proposal of the competent committee, has approved this *Diversity and Inclusion Policy* (the “**Policy**”).

### 1. Purpose

This Policy establishes the guidelines and courses of action aimed at promoting a culture of respect for diversity and inclusion in the workplace, in an effort to ensure—as a strategic objective—the development of labor relations based on the creation of a diverse and inclusive working environment, which contributes to the achievement of our corporate goals and better business performance.

Sacyr is firmly committed to **Diversity**. Our teams consist of people with different profiles from different cultures and backgrounds, including factors of race, gender, gender identity and expression, ethnicity, age, education, religion, sexual orientation, physical/intellectual capacity, etc. The Company recognizes that people are unique because of their differences and similarities, and advocates the utmost respect for others.

The Company also supports a culture of **Inclusion**. We promote inclusion by creating an environment where each person can achieve their goals and develop professionally. We are committed to building a workplace where all professionals treat others with the utmost respect. We maintain a zero-tolerance policy against all types of discrimination.

This Policy establishes guidelines and courses of action in matters of Diversity and Inclusion, allowing us to identify and specify the concept of Diversity at the Company, implement the measures and actions necessary to ensure these principles, and communicate with stakeholders.

At Sacyr we believe in the power of people. Our growth begins with the professional development of each member of the Company. Our goal is to have a diverse, creative, innovative workforce, where our professionals feel part of a dynamic and talented team.

This Policy, developed by Sacyr, S.A., will be implemented by all Group companies upon adaptation to local regulation and the recommendations or requirements established by the competent authorities.

### 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 implement this commitment to Diversity and Inclusion, the conduct of Sacyr and the other Group companies will be guided by the following principles:

- a) Guaranteeing a work environment based on dignity and respect for all people, free of discrimination, harassment, and other forms of intolerance and violence.
- b) Promoting equal opportunities, establishing the measures and actions necessary to achieve true equality of treatment and opportunity among all professionals, and preventing situations of direct or indirect discrimination on all Company levels that may concern race, nationality, ethnicity, age, physical/intellectual capacity, religion, gender, sexual orientation, marital status, and any other physical or social circumstance.
- c) Providing an inclusive working environment where individual differences are respected and valued, ensuring that all people feel included and accepted, thus fostering creativity and innovation.
- d) Adapting our measures and policies to include diversity and uniqueness in our human capital, promoting the personal and professional development of our employees and tending to their specific needs.
- e) Involving the entire Company in matters of diversity, both internally (regardless of position at the Company) and with clients, suppliers, and other stakeholders.
- f) Promoting awareness and compliance with this Policy among those with whom the Company engages for commercial purposes: partners, suppliers, contractors, distributors, as well as any other public or private entity associated with our operations or services.

The Company will develop procedures and implement the appropriate training programs to achieve these objectives.

### **4. Areas of application and strategic lines**

Based on the general principles established, Sacyr defines the following scope of application, which frames the strategic lines of Diversity, Equality and Inclusion into the labor-management relations cycle management on all stages, from attraction, recruitment, onboarding, development, consolidation and separation, according to the following lines of action:

- i. Attraction: contributing to and showcasing employer branding as a diverse, egalitarian, and inclusive company, where any person will be valued based on their talent, and their physical, personal or social traits.
- ii. Recruitment: ensuring transparent, objective, and unbiased recruitment processes, guaranteeing equal access to opportunities and non-discriminatory practices to ensure the inclusion of diverse groups.
- iii. Onboarding: supporting and facilitating the inclusion of each individual, based on their particular characteristics throughout their onboarding process into the workplace.



- iv. Development: guaranteeing an equal professional development for all, by assessing the know-how and skill set for the job and the objective job performance.
- v. Consolidation: offering training that incorporate respect to diversity and equality and reinforcing our commitment as a company and through our employees to this issue.
- vi. Separation: watching that the separation between employer and employee is non-discriminatory based on the parting employee's physical, personal or social traits and walking them through the off-boarding process.

Under these strategic dispositions, Sacyr defines the following areas of application in terms of Diversity, Equality and Inclusion, thus acquiring a set of commitments that, in turn, contribute to the achievement of several objectives related to the UN's Sustainable Development Goals:

1. *Gender diversity*: Promoting equal opportunities and fostering gender equality on all Company levels.

- i. Promoting a respectful and non-discriminatory environment, fostering equal access to opportunities.
- ii. Promoting work-life balance for all employees.
- iii. Enforcing the presence of women on all levels, especially in leadership positions, guaranteeing their professional development through equal access to opportunities.
- iv. Reducing the wage gap between men and women in equal-responsibility roles, if any.

2. *People with disabilities*: Valuing the unique potential of differently-abled people and capitalizing on their talent.

- i. Promoting workplace inclusion of people with disabilities
- ii. Improving the integration of people with disabilities at onboarding.
- iii. Supporting the recruitment and consolidation of people with disabilities in the workplace.

3. *Social and cultural diversity*: Appreciating, respecting, and capitalizing on cultural differences as a source of added value.

- i. Promoting respect for and the value of cultural diversity.
- ii. Viewing cultural diversity as a source of knowledge and talent, and a vector of added value.
- iii. Facilitating inclusion by raising awareness and intercultural understanding.
- iv. Promoting the inclusion of groups at risk of social exclusion.
- v. Championing the recruitment and consolidation of people at risk of social exclusion in the workplace.

4. *Generational diversity*: Contributing the workplace integration and the coexistence of different generations.

- i. Promoting workplace integration among different generations.
- ii. Ensuring the management and optimization of multigenerational talent at the Company.
- iii. Establishing measures aimed at avoiding age-based bias in selection, hiring, and promotion processes.
- iv. Actively striving to manage the challenges associated with a multigenerational company.



Similarly, communication and awareness are considered crosscutting principles of the foregoing, with the aim of disseminating and raising awareness of this Policy within the Company and among its stakeholders.

The Board of Directors of Sacyr approved this *Diversity and Inclusion Policy* on July 29, 2020 and was last modified on December 22, 2022.