

SUSTAINABILITY POLICY FRAMEWORK

Subsequent to review by the competent Committee and at the Committee's recommendation, the Board of Directors of Sacyr, S.A. ("**Sacyr**") has approved this Sustainability Policy Framework (the "**Policy**") in the furtherance of its general non-delegable duty to set the company's global policies and strategies.

1. Purpose

The purpose of this *Policy* is to establish the general principles and bases that govern the sustainability strategy of Sacyr and its Group companies ("**Group**"), in order to ensure that all activities are carried out with the aim of creating long-term value for the company, its shareholders, and other stakeholders, while endeavouring to meet the UN's Sustainable Development Goals (**SDG**) and disavowing actions that impede this aim.

Sacyr recognises the need to build a sustainable future in all the communities where it operates and is committed to doing so, in accordance with its *Purpose*.

Based on the foregoing, this *Policy* contains the framework by which Sacyr develops and implements its approach to sustainability as the cornerstone of its Strategic Plan, thus encompassing and guiding the various sustainable development policies that augment and expand on the principles and bases contained in this *Policy*.

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. Sustainability strategy goals

The sustainable development strategy of Sacyr and its Group complies with the statutory mandate of creating sustainable value by engaging in the activities cited in its corporate



purpose, taking into consideration all stakeholders concerned with its business activity and institutional reality, and ensures the achievement of the following objectives:

- Fulfilment of the *Purpose, Mission, Vision* and *Values* of Sacyr and the interest of stakeholders;
- Maximising value creation in a sustainable way, avoiding short-term approaches;
- Improving the competitiveness of Sacyr and its Group through management practices based on innovation, efficiency and sustainability;
- Maximising the positive and minimising the negative effects on the environment and the communities where Sacyr and its Group operate, as well as for all other stakeholders; Promoting an ethical, transparent business culture, based on the trust of stakeholders;
- Developing adequate sustainability risk management; and
- Contributing to the achievement of the company's sustainable, strategic objectives and the ongoing improvement of its reputation;

Through these goals, Sacyr and its Group demonstrate their maximum public commitment, assuming their role in the promotion of economic, social, and environmental sustainability and contributing to the improvement of the environment, society, and the future.

4. Competent organizational structure regarding sustainability

Based on Sacyr's corporate structure and governance, the bodies listed below serve to perform the following functions and duties (among others):

- a) The Board of Directors of Sacyr is responsible for approving the company's Strategic Plan and sustainability policies;
- b) The Sustainability and Corporate Governance Committee reviews the internal standards of Sacyr's corporate governance system and submits proposals for improvement to the Board of Directors, with special emphasis on sustainable development and corporate governance policies, taking into account generally recognized good governance recommendations; and
- c) The Sustainability Committee adopts, monitors, and proposes the improvement of practices and management in the field of sustainability.

5. General sustainability principles

In an effort to achieve the specified sustainable development goals, Sacyr and its Group adhere to the following general principles: To adopt and comply with the prevailing legislation in the countries and territories where Sacyr and its Group operate, with its corporate governance system and its ethical standards and practices; to adopt international commitments, standards, and guidelines where there is inadequate or insufficient legal development;

- To adopt a corporate governance model consistent with international good governance recommendations; To guarantee fulfilment of the *Purpose* and to adapt the Code of Conduct to the sustainability principles on an ongoing basis;
- To support all policies that expand sustainability and promote the effective supervision and monitoring of its compliance;
- To promote achievement of the Sustainable Development Goals (SDG);
- To encourage active, ongoing communications with the various stakeholders about the activities of Sacyr and its Group with regard to sustainability;
- To voluntarily adhere to public or private agreements in order to assume commitments and define actions with all stakeholders, in line with the objectives of this *Policy*;
- To obtain and maintain certifications in accordance with internationally recognised standards;
- To drive the circular economy and consumption, as well as green revenue;
- To promote Diversity, Equality, and Work/Life Balance Plans among personnel;
- To comply with the requirements applicable to sustainability and to monitor national and international recommendations.

6. Sustainability scope

Sacyr's sustainability scope includes the following:

a) Social impact and the fight for equality: Sacyr and its Group measure the direct and/or indirect impact of activity in the regions and communities where they operate, fighting against discrimination and inequality in their many forms, as detailed in the general principles of the *Diversity and Inclusion Policy*;

b) Quality: Sacyr and its Group view the quality of their services as a fundamental factor in the performance of their activities, with the goal of ensuring client satisfaction, fulfilling mandates, and satisfying users, all under the fundamental premise of compatibility with the environment and improved energy performance, as detailed in the *Quality, Environment, and Energy Management Policy*;

c) Environment: Sacyr and its Group aspire to be leaders in their sector by—among other things—respecting the environment, developing a strategy to fight climate change, and implementing an efficient environmental management system to minimise environmental impact to the extent possible, as detailed in the *Quality, Environment, and Energy Management Policy*; the *Policy Against Climate Change*; the *Water Policy*; and the *Biodiversity Policy*;

d) Corporate governance: Sacyr and its Group adopt the best national and international corporate governance practices, in accordance with the principles and criteria contained in the *General Corporate Governance Policy*;

e) Talent management and work/life balance: Sacyr and its Group promote the training and qualification of its human team by favouring personal and professional development and facilitating a work/life balance, as some of the areas that frame the strategic lines of the *Diversity, Equality and Inclusion Policy*;



f) Diversity: Sacyr and its Group promote a culture of respect for diversity (in all its manifestations and variables) and inclusion in an effort to guarantee, as a strategic goal, the development of working relations based on the creation and promotion of a diverse and inclusive working environment that helps achieve the corporate objectives and improves business performance, as detailed in the *Diversity, Equality and Inclusion Policy*;

g) Health and safety: Sacyr and its Group prioritise the adoption and implementation of comprehensive health and safety measures for employees, from planning to execution, that promote wellbeing in the workplace and prevent risks that may occur in the course of activity. For those risks that are considered unavoidable, all the necessary prevention and protection measures are put in place to prevent harming or jeopardising the health of workers and collaborators, as detailed in the *Occupational Health and Safety Policy*;

h) Innovation: Sacyr and its Group are committed to innovation as a fundamental and strategic factor in achieving economic, social and environmental sustainability for the Group and its value chain, in accordance with the principles and criteria contained in the *Innovation Policy*; and

i) Human Rights: Sacyr and its Group respect Human Rights as a fundamental value of the Group's public commitment, according to the provisions of the *Human Rights Policy*, and pledge to control and monitor Human Rights compliance with respect to those who work at and on behalf of the organisation, promoting initiatives and action plans that aim to protect human rights and have a positive, sustainable social impact.

The Board of Directors of Sacyr approved this *Sustainability Policy Framework* on October 1 2020, superseding the previous Corporate Social Responsibility Policy, and was modified on December 22, 2022.