

HUMAN RIGHTS AND COMMUNITY RELATIONS POLICY

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

The objective of this Policy is to define and establish the principles and mechanisms that must govern any actions that those to whom it is addressed may take in the field of Human Rights.

1. Purpose

Respect for Human Rights by Sacyr, and in relation to any of its stakeholders, is a core value of the Group's commitment to society.

For many years, Sacyr has recognised the need to respect, and ensure respect, for Human Rights in all the territories in which it operates. In this sense, Sacyr's commitment is expressed through this Policy, as it is committed to controlling and monitoring compliance with Human Rights in relation to those who work in the organisation and on its behalf, as well as with the various stakeholders it works with in carrying out its activities.

As it is well aware of its national and international responsibility to respect Human Rights, Sacyr wishes to actively and decisively contribute to a sustainable future, guaranteeing the eradication of any conduct and activities at Sacyr and its Group companies that are not in line with this Policy, and taking all the actions within its power to this end.

With this *Policy*, Sacyr demonstrates its public commitment at the highest level to assume its responsibility to respect Human Rights, contributing to the improvement of our environment, our society and our future.

2. Scope

This *Policy* applies to all the companies in the Sacyr Group, taking into account their specific characteristics. For purposes of this document, the Sacyr Group is defined as comprising (i) all subsidiary or majority-owned companies in which Sacyr, S.A. directly or indirectly exercises effective control, irrespective of their geographical location; and (ii) the Sacyr Foundation. Therefore, all references to the Sacyr Group contained in this *Policy* are to be understood to extend to all those companies and the Foundation.

Its scope does not include subsidiaries or companies in which Sacyr, S.A., does not directly or indirectly exercise effective control, which must have their own policies or internal regulations in this field and may not contravene this *Policy* under any circumstances.

3. International Framework

This *Policy* and the actions, procedures, activities and operations of the SACYR Group with regard to human rights are based on the following core values of international and EU law, as well as other international human rights standards:

1. The United Nations International Bill of Human Rights, consisting of:
 - The Universal Declaration of Human Rights (UN, 1948).
 - The International Covenant on Economic, Social and Cultural Rights (UN, 1966).
 - The International Covenant on Civil and Political Rights (UN, 1966).
2. The European Convention on Human Rights.
3. The United Nations Convention on the Rights of the Child.
4. The Convention on the Rights of Persons with Disabilities (UN, 2006).
5. The Charter of Fundamental Rights of the European Union (2000).
6. UN Human Rights Council Resolution 48/13 of 8 October 2021 recognising the right to a clean, healthy and sustainable environment as a human right.
7. The Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities (UN, 1992).
8. The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO, 1998), the eight fundamental conventions that complement it, and the Convention concerning Indigenous and Tribal Peoples in Independent Countries.
9. The Declaration on the Rights of Indigenous Peoples (UN, 2007).
10. The United Nations Guiding Principles on Business and Human Rights (2011)
11. The Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration) (2022)
12. The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023)
13. National constitutions and laws that enshrine or implement human rights.
14. Social Accountability Standard SA 8000.

4. Our commitments

To make good on this commitment, Sacyr and the other companies in its Group are committed to:

- a) Following the United Nations Guiding Principles on Business and Human Rights.

- b) Respecting human rights with regard to the laws protecting children and youths
- c) Taking appropriate measures to ensure a safe working environment and reject all forms of child labour, forced labour and human trafficking.
- d) Respecting the principles of freedom of association and the right to collective bargaining
- e) Preventing any discrimination on the basis of race, caste, sex, nationality, religion, disability, gender, sexual orientation, political or trade union affiliation, as well as violence and sexual harassment.
- f) Implementing measures to ensure that workers' working conditions (working hours, physical and psychological conditions) are adequate, favouring work-life balance.
- g) Ensuring a living wage in accordance with the amount established by law or through the collective bargaining agreements applicable at each workplace.
- h) Recognising and respecting the rights and nature of indigenous, tribal, aboriginal and aboriginal peoples, in accordance with the legislation in force in each country (as long as it does not contradict international standards). This includes their rights of ownership, control and management over their lands, territories and natural resources, and their right to make their own development decisions.

5. General principles

Likewise, Sacyr and the other companies in its Group are committed to the following general principles:

- a) Identifying, preventing, mitigating and accounting for how they address their potential or actual adverse human rights impacts in all their operations and activities.
- b) Remedying, to the extent possible, any adverse human rights impact they may have caused or contributed to.
- c) Encouraging and promoting training and awareness-raising initiatives for Sacyr stakeholders in the area of Human Rights.
- d) Actively fostering a culture that promotes respect for human rights, as well as behaviours conducive to this respect.

- e) Voluntarily adhering to public and private agreements that aim at taking on commitments and defining actions that will reduce conduct that contravenes this *Policy*.
- f) Obtaining and maintaining certifications according to internationally recognised standards.
- g) Encouraging suppliers to take on the commitment to comply with this Policy.
- h) Complying with the applicable requirements related to the respect for human rights, as well as the follow-up of recommendations on the matter, at national and international level.
- i) Actively and continuously communicating the actions Sacyr takes with regard to respect for Human Rights.
- j) Assessing human rights risks through due diligence processes based on the outcome of corporate risk assessments in new business relationships (mergers, acquisitions, joint ventures) and in projects under development and management.
- k) Reducing the exposure of operations to human rights issues.
- l) Adhering to the applicable human rights legislation.
- m) Putting grievance mechanisms in place for human rights issues.

Any possible human rights violations in contravention of the legislative framework or the statements of commitments provided in this policy, or of Sacyr's Code of Ethics, may be reported through its Whistleblowing Channel, a tool that we have set up at Sacyr to facilitate confidential and anonymous reporting of any breaches of our Code of Ethics and Conduct. The Whistleblowing Channel can be accessed from Sacyr's external website: <https://www.sacyr.com/canal-etico>.

This *Human Rights and Community Relations Policy* was approved on 11 June 2020 and was last amended by the Board on 19 December 2024.