



BIODIVERSITY 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 *Biodiversity Policy* (hereinafter, the "**Policy**").

The aim of this *Policy*, aimed at all stakeholders, is to define and establish the principles and criteria that govern activities related to Biodiversity.

1. Purpose

Sacyr, aware of the impact of its activities on the ecosystem and the importance of the conservation of biodiversity, adopts respect for these in the course of its projects and operations.

Sacyr understands that such behavior cannot be imposed from the outside, rather it should come from its own human team, as well as the other companies in its Group, as part of its culture of respect for the environment, encouraging everyone to embrace it in their working environment and also encouraging its protection on the part of different stakeholders.

As a consequence, the protection of the environment and especially biodiversity is approached with a proactive attitude. For this reason, one of its strategy lines is aimed at different levels of the Sacyr organization and other companies in the Group moving forward in the development of methods aimed at the conservation, the reestablishment and sustainable use of terrestrial ecosystems, putting a stop to the loss of biological diversity, the rehabilitation of degraded land, and the mobilization and increase in financial resources for their conservation and use.

2. Scope of application

This Policy is applicable to all entities belonging to the SACYR Group, in accordance with their own characteristics. 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.

Its scope does not include subsidiaries or companies in which Sacyr, S.A. does not exercise effective control, either directly or indirectly, and which, where applicable, shall have their own policies or internal regulations governing the matter, and in no case may these be contrary to the provisions of this Policy.



3. General Principles

To achieve the implementation of the biodiversity commitment, Sacyr and the other companies that belong to its Group shall follow the guidelines contained in the general principles below:

- a) Integrate the conservation of biodiversity and natural capital into the Group's strategy, making it an important element in decision-making, in phases of project tendering, execution and operation, and establishing objectives that ensure the responsible management of natural capital.
- b) Effectively apply the mitigation hierarchy: Measure potential impacts on the environment to avoid, minimize, restore or compensate in order to generate a positive or net balance on biodiversity.
- c) Conserve and make sustainable use of biological diversity and natural capital.
- d) Protect species and habitats, both those that are under threat and those that represent a high value for biodiversity, through the adoption of preventive, minimizing and improvement measures.
- e) Promote compensation for impacts generated by activities in biodiversity and, especially, on habitats and protected species.
- f) Avoid deforestation associated with the supply chain and our activities
- g) Promote training for employees and partners in responsible practices for terrestrial ecosystems and biodiversity and awareness in the area of biodiversity, collaborating with local communities, recovery centers, research centers, administrations and other interested parties, with the aim of conserving and protecting biodiversity.
- h) Encourage the enhancement of biodiversity and divulge news of actions undertaken by Sacyr for its conservation.
- i) Promote voluntary adhesion to collaboration agreements and alliances, of a public or private nature, with the aim of assuming commitments and defining actions in line with the objectives of this Policy.
- j) Extend our commitment to biodiversity and natural capital conservation throughout our value chain.

This *Biodiversity Policy* was approved by Sacyr's Board of Directors on 11 June 2020 and amended on 23 February 2023.