

CONFLICT MINERALS STATEMENT

Sacyr is committed to legal and ethical compliance in all of its business practices. The company also supports the efforts of organizations whose objective is to end the violence and human rights violations associated with activities related to the extraction of “Conflict Minerals” in Central Africa. This commitment was reinforced on August 22, 2012, when the United States Securities and Exchange Commission (SEC) announced the adoption of the final rules regarding “conflict minerals” under Section 1502 of the Dodd – Frank Wall Street Reform and Consumer Protection Act (“Conflict Minerals Rules”).

The purpose of these Conflict Minerals Rules is to promote the non-use of minerals that could finance violent conflicts in Central Africa.

“Conflict Minerals” include columbite – tantalite (coltan), gold, cassiterite, wolframite, or their derivatives, currently limited to tin, tantalum, and tungsten, regardless of their origin, when they originate from, are mined in, or are sourced from the Democratic Republic of the Congo or adjoining countries (Angola, Central African Republic, Burundi, Republic of the Congo, Sudan, Rwanda, Uganda, Tanzania, and Zambia).

The following principles govern the Company’s position regarding Conflict Minerals”:

- Sacyr is committed to operating in a socially responsible manner, protecting the environment and the communities in which it operates, while recognizing the importance of concerns related to the sourcing of materials from regions affected by political and social conflicts.
- Sacyr will not knowingly provide direct or indirect support to armed groups or non – state security forces that control or illegally tax mines, trading points, transportation routes, or any upstream intermediaries in the supply chain. Furthermore, Sacyr has a Code of Conduct that expressly prohibits its employees from engaging in corruption, money laundering, terrorism, and bribery – related activities. Parties within our supply chain are expected to adhere to the same principles.
- Sacyr will follow due diligence procedures related to conflict minerals that are consistent with nationally or internationally recognized due diligence frameworks, including, where applicable, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict – Affected and High – Risk Areas.
- Sacyr will not voluntarily procure materials containing conflict minerals from the Democratic Republic of the Congo or neighboring countries.

As mining companies are positioned far upstream in Sacyr’s supply chain and the Company does not have the ability to determine the exact traceability of mineral origins, Sacyr believes that preventing the use of Conflict Minerals requires extending this commitment to its direct suppliers, thereby ensuring its progressive transmission throughout the entire supply chain.

Objectives for Suppliers

- Sacyr encourages its suppliers to source materials from conflict-free sources. Sacyr does not seek to prevent its suppliers from responsibly sourcing from legitimate mines located in the Democratic Republic of the Congo, as doing so could negatively affect local economies and communities.
- As much as possible, Sacyr will incorporate responsible conflict mineral sourcing principles into contractual terms with its suppliers and work jointly with them to raise awareness of these issues within their supply bases. This statement may be made available to suppliers with the expectation that they adopt similar policies regarding their own supply chains.
- Sacyr encourages suppliers that manufacture parts, components, or products containing conflict minerals to procure materials from conflict – free sources. They are expected to acknowledge, incorporate, and communicate their position regarding conflict minerals to their sub – suppliers and, wherever possible, require their successive suppliers to adopt similar policies.
- Sacyr reserves the right to request evidence from suppliers regarding their conflict mineral supply chains, including, where appropriate, information at the mining level.
- Sacyr urges its suppliers to support industry efforts to improve the traceability of conflict minerals and responsible practices throughout global supply chains.

Madrid, December 20, 2021



Signed: Fernando Lozano
CORPORATE GENERAL DIRECTOR