Sustainable
Financing Framework
2025

sacyr

Content

Introduction

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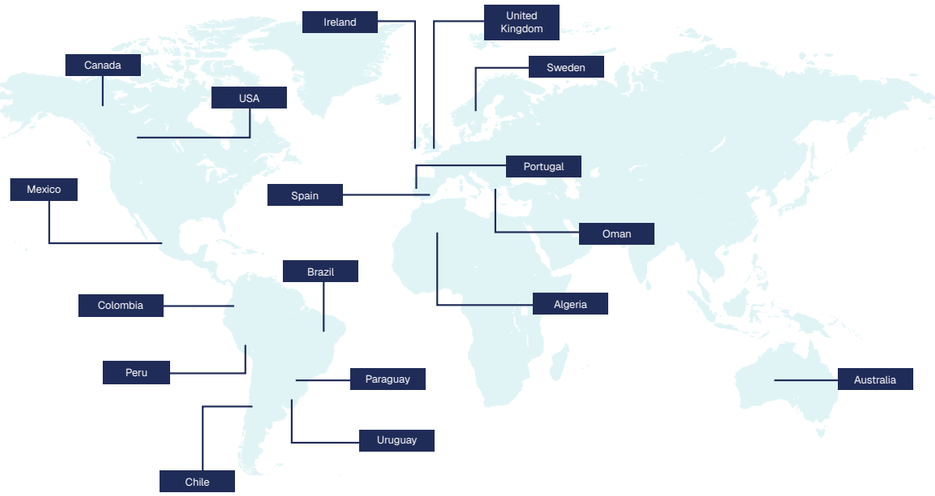
Introduction

Sacyr is a global infrastructure group listed on the **IBEX 35 stock market index**. We operate in more than 15 countries across four continents, where we implement innovative projects with a high environmental, social, and economic impact.

Sacyr's activity is guided by our **purpose** and by **values** that define us, steer our course and shape our actions in every project phase. As an industry leader, we place the talent of our employees at the service of progress, and we invest every effort and all our passion **challenge into an achievement that builds the future, improving people's lives.**

Our business model



Purpose

Driving society towards a sustainable future through the development and management of infrastructure that generates a positive social, economic and environmental impact for the benefit of all our stakeholders.

Excellence and reliability

We strive to offer the highest quality and to be a reliable partner for our clients.

Team spirit and passion

We collaborate as a team to achieve our goals, with passion in all that we do.

Sustainability and Innovation

We reinforce our commitment to environment and society, with innovation as a driver for transformation.

Resilience and proactivity

We are ready for any challenge that comes our way, being courageous in offering new solutions.

In recent years, at Sacyr, we **have redefined our company profile**, based on a P3 business model that intervenes throughout the entire value chain of the infrastructure sector from the tender, design and financing to asset construction, operation and maintenance.

Our principal activities are the following:

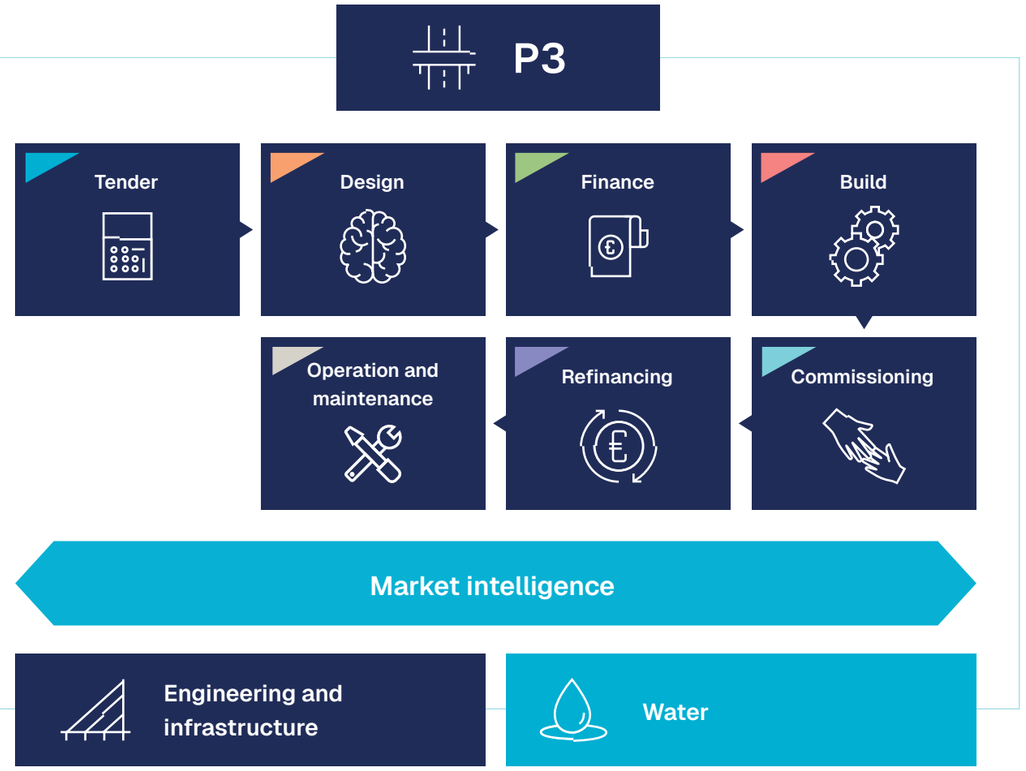
- Transport infrastructures (highways, metro and railways, airports, transport hubs, maritime and hydraulic works)
- Social and health infrastructure (hospitals, universities)
- Residential and non-residential buildings
- Integrated water cycle, water treatment and desalination plants
- Energy-related industrial projects
- Restaurant services and service stations (highways, airports, train stations, etc.)

The success of our business model

Our **strategic approach** underpins the company's stability and soundness through the development of long-term projects in consolidated markets, with low demand risk, which generate predictable, stable, and recurring revenues that, in turn, finance the associated debt and generate cash for the Group.

The **vertical integration** of the Sacyr Group's different business lines allows us to generate value throughout a P3 projects life cycle, making us stronger and more competitive thanks to:

- **An increased capacity to identify new opportunities** through our in-depth knowledge of markets.
- **Design optimization to improve cost efficiency** over the projects' lifetime.
- **Streamlining** of time frames.
- **Financing capacity** through structures that increase asset value.
- **Appropriate risk allocation** during the construction, operation and maintenance phases.
- **Extensive experience** in commissioning and managing assets.
- **Selective asset rotation**.



Strategic vision

In this new cycle, the company sought to broaden the scope of its ambition even further, with the aim of **enhancing the positive impacta** of its activities on society, the environment and the company's own finances.

For this reason, the basic pillars of Sacyr 2024-2027 Strategic Plan are **Growth in P3 activities, Financial discipline, New shareholder remuneration policy and Sustainability Leadership**.

A vertically integrated business model

Single platform for project development

A professional team

Sustainable management

Growth in P3

- Larger projects
- Equity committed: €1 Bn
- Partnership by means of a brownfield asset vehicle

Financial discipline

- Focus on cash generation
- Limited recourse debt
- *Investment grade*

New shareholder remuneration policy

- Continued dividend growth and a minimum of €225 million will be paid in cash

Sustainable leadership

- Sacyr Sustainable Roadmap 2024-2027

Sustainability as a pillar

We are aware of our role as a driver of change in society and in order to respond to the needs of all our stakeholders, we have a sustainability strategy in place. Through our **Sacyr's Sustainable Route 2024-2027**, we place sustainability at the core of our decisions, integrating the ESG vision into our activities and focusing on those areas in which the company can generate the greatest impact.

Sacyr´s Sustainable Route 2024-2027 is an ambitious plan to face current and future global challenges, integrating the ESG aspects into our decision-making and activity development. This plan is structured around **four pillars: Planet, People, Prosperity and Governance**, and three cross-cutting levers, Culture, Innovation and Sustainable Finance.

Planet

- Climate change
- Circular economy
- Water
- Natural Capital

- We will continue with our **climate change-fighting initiative** securing validation for our **2050 zero-emissions target through the Science Based Targets Initiative (SBTi).**
- We will enhance our positive influence on natural resources by promoting waste recycling, reuse, and recovery, reducing our water consumption, and supporting biodiversity conservation.

Prosperity

- Social action
- Communities
- Value chain

- We will maximize our **positive impact** on the communities where we operate.
- We will encourage **safer and more sustainable** practices in our supply chain.

People

- Safety, health and well-being
- Attracting, developing and engaging talent
- Diversity, equity and inclusion

- Our goal is to reduce accident and injury rates, reinforcing Sacyr's position as a leader in **safeguarding the health and safety** of our workforce.
- We distinguish ourselves as a **leading employer brand** dedicated to diversity, employee well-being, and the attraction and retention of top talent.

Governance

- Corporate governance
- Regulatory compliance
- Risk management

- We will uphold all our **commitments** to corporate governance and **international best practices**.
- We will actively monitor and assess the expectations and needs of our **stakeholders**.

Culture, innovation and sustainable finance

Our ESG commitment, articulated from the highest governance body to day-to-day operations

To guarantee the application of the policies and the fulfillment of the established goals, Sacyr has a **Audit and Sustainability Committee** at the board of directors' level and a **Sustainability Committee** at the executive management level.

The **Audit and Sustainability Committee** is responsible for supervising, proposing and updating corporate environmental, social and good governance policies for consideration and approval by the Board and determining the criteria and guidelines that should govern the content of the Consolidated Statement of Non Financial Information and Sustainability Reporting.

The **Sustainability Committee** is responsible for developing and implementing sustainability-related policies and actions within a strategy aligned with the SDGs.

Our contribution to the SDGs

At Sacyr, we are aware of our role as a driver of change in society, with sustainability as a fundamental pillar of our activities. Consequently, **the Group integrates the Sustainable Development Goals** included in the United Nations' 2030 Agenda, as a model for the company's current and future development.

The **critical challenges the world** is currently facing as water stress, climate change, inequalities, waste management, universal access to healthcare services, among others, require immediate action.

Our activity contributes to promote social and economic progress with a solid environmental commitment:

Objective & scope of application

02

Objective & scope of application

Sacyr has applied the highest standards when developing this **Sustainable Financing Framework** (hereinafter the “Framework”).

The Framework has been created to facilitate **transparency**, **disclosure**, and **integrity** of the company’s sustainable financing initiatives.

A Sustainable Financing Framework built on transparency, disclosure, and integrity

The **scope of application of the framework** pertains to financial instruments and eligible projects, activities and businesses located mainly in Africa, America, Europe, the Middle East and Oceania. The Company is keen to pursue an innovative sustainable financing approach, intended for the holding company and for any of its subsidiaries, which includes sustainability-linked bonds, sustainability-linked loans, green bonds, green loans, social bonds, social loans, and other forms of subsidized financings, including transactional banking products (guarantee lines leasing, supply chain, etc.).

The **combination of green and social eligible projects financed** by one facility, will be designated as Sustainable.

The financial products , issuances and/or contracting of Loans structured under the Sustainable format (whether Green/Social or Sustainability-Linked) will be used exclusively to finance new projects or refinance existing projects, partially or totally, as well as day to day business operations.

Regarding green and social financing, the projects are classified as **Eligible Green Projects and Eligible Social Projects** in line with the categories, eligibility criteria, exclusions and impact indicators listed in the following sections.

Sustainability Linked facilities follow the approach consisted in linking its ESG Indicator as issuer or borrower to the terms of general corporate purposes debt, incentivizing the achievement of pre-determined Sustainability Performance Targets (SPTs) within a pre-determined timeline.

The definition of this structure and the selection of any ESG KPI will be specified in the relevant contractual documents when structuring a **Sustainability-Linked Facility**. The Company could eventually update this Framework and commits that any new version will keep or improve current levels of transparency and reporting (with the corresponding review by an external advisor) and that it will be publicly disclosed in its website.

Guidelines

03

Guidelines

This Framework has been established in accordance with the **International Principles** set by the Loan Market Association (LMA) and the International Capital Markets Association (ICMA), that aim to facilitate and support **environmentally and social sustainable economic activity**.

Those International Standards are a set of **voluntary guidelines** that promote integrity in the development of green and social financing instruments.

This Framework has been developed under the Green Bond Principles (GBP), Social Bond Principles (SBP), Sustainability-Linked Bond Principles (SLBP) set by ICMA, and the Green Loan Principles (GLP), Social Loan Principles (SLP) and Sustainability-Linked Loan Principles (SLLP), set by LMA.

According to the GBP and GLP, SBP and SLP, this Framework is aligned to the guidelines in their **four core components**:

Use of Proceeds

Process for Project Evaluation and Selection

Management of Proceeds

Reporting

According to the SLLP and SLBP, the framework would also cover the following components:

- Selection of Key Performance Indicators (KPIs)
- Calibration of Sustainability Performance Targets (SPTs)
- Financial characteristics
- Reporting
- Verification

An External Review will be incorporated as a separate document, certifying the alignment of this Framework to the previously mentioned Guidelines and Principles.

Green and social financing

04

Green and social financing

Use of Proceeds

Green and social financing instruments will be used to finance or refinance, in whole or in part, the following Eligible Projects in accordance with the GLP/SLP and the GBP/SBP. All financed Green and Social Projects will deliver clear environmental or social benefits.

In the case of a **possible Green/Social Bond issuance**, as a general premise, the assets included in the Eligible Projects will not exceed 36 months (before the issuance date of the respective instrument) and will be incorporated in the green/ social bond reporting. For financing and refinancing eligible projects, the criteria will be analyzed on a case-by-case basis under this Framework.

Sacyr will exclusively use the proceeds from green and social financing instruments to **finance or refinance the portfolio of eligible projects, assets or services** within the eligible categories as defined in this Framework.

Eligible Project Categories

Sacyr defines each of the Green and Social Eligible Categories in the table below including a description of the Category, the expected contribution to the United Nations Sustainable Development Goals (UN SDGs) and the types of Projects that fall under each Category along with its Eligibility Criteria.

This has been defined using **several sources of information** such as:

- **Publicly available guidelines or standards** (Green and Social Bond/ Loan Principles, published by ICMA and LMA; The Climate Bond Initative and ISO certifications among others).
- Existing **market practices**.
- **General internal principles** set out in our various ESG policies, which can be found at our website.

The Eligibility Criteria and Projects are not necessarily aligned with the EU Taxonomy; however, certain specific thresholds within some projects may reference or draw from it. **Green Categories**:

Green Categories	Description	SDG and environmental objectives	Projects and Eligibility Criteria
Renewable energy	• The production of electricity through design, construction and operation and maintenance of: (I) renewable photovoltaic energy projects, (II) renewable wind power projects, (III) renewable projects based on waste to energy with biomass. • Design and construction of renewable hydroelectric energy plants.	**Target**: • Contribute to the decarbonization of the economy. • Provide energy from renewable sources. 	• The production of electrical energy (I) through photovoltaic panels, (II) through wind generators (III) production of electrical energy from agricultural and forest biomass (not coming from virgin forests) and derived from the maintenance of forests. Comply with Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources and comply with the efficiency established in the Spanish Royal Decree 413/2014, which regulates the activity of electricity production from renewable energy sources, defined in Annex I. • The design and construction of hydroelectric energy plants will be focused on the transmission and supportive infrastructure. The criterion to be used to be considered as a renewable energy improvement is the EU taxonomy threshold, regardless of project location . The projects will be executed according to the environmental regulations of each country, e.g., Environmental impact statement, due diligences, etc.
Energy efficiency	• Construction of electrical substations and transformer stations. • Construction of high and medium voltage networks. • Design, supply and assembly of equipment.	**Target**: • Contribute to the decarbonization of the economy. • Reduce energy losses in the grid. 	• Construction and maintenance of electrical substations and high and medium voltage networks, that allow for greater security of supply, rational use of energy, better voltage regulation, fewer supply interruptions, online loss reduction, etc., resulting in better energy performance. • Optimization of equipment in industrial facilities to improve energy efficiency. The criterion to be used to be considered as an energy efficiency improvement is the achievement of ISO 50001, energy management or EU taxonomy threshold. regardless of project location. Eligibility Criteria will also consider the Screening indicators of the CBI Taxonomy where applicable.

Green Categories	Description	SDG and environmental objectives	Projects
Green buildings	• Design, construction and operation and maintenance of new buildings and/or renovated buildings. These will be conducted in order to meet regional, national or internationally recognized standards or certifications for environmental performance, such as LEED, BREEAM, VERDE, PASSIVHAUS, CES, CEQUAL (Breeam Infrastructure).	**Target**: • Contribute to the decarbonization of the economy. • Increase the energy performance of buildings. • Improve the performance of buildings throughout their useful life. 	• Construction of new buildings and remodeling of existing ones. In the case of building rehabilitation, those buildings that improve their energy efficiency, increasing their energy classification. The criterion to be used to be considered as an energy efficiency improvement is the EU taxonomy threshold, regardless of project location. For building renovations, Sacyr will take into account the highest energy efficiency standards according to the project's geography (Spain Certification A or B, etc). • Construction of new buildings and remodeling of existing buildings with sustainable construction certification, will hold at least Very Good category in Breeam, Gold in Leed, VERDE (three leaves) PASSIVHAUS (Classic), CES (certified building), CEEQUAL- BREEAM Infrastructure (Very Good); using their holistic approach to achieve ESG, health and wellness and Net Zero Carbon goals. The requirements for sustainable construction certifications are adapted to local regulations.
Clean transportation	• The construction and maintenance of infrastructures that enable low-emission, clean and efficient transportation: electric train, tramway, and metro. • Recharging stations and associated infrastructure. • Electric, hybrid and electrified vehicles.	**Target**: • Contribute to the decarbonization of the economy. • Provide low-emission or zero-emission transportation. • Increase sustainable mobility. 	Infrastructure • Infrastructure related to clean transportation, such as: train, tramway, subway, etc. Includes the construction of stations. • Design and construction of electrified road infrastructures. • Design and construction of charging infrastructures for electric and electrified vehicles (when separable from fossil fuel filling stations and garages). According to the CBI Taxonomy, these activities are automatically eligible under the Transport Criteria. Acquisition, leasing and renting of low-emission vehicles and machinery. • Vehicles: electric, "zero emissions" and/or green hydrogen fuel cell. • Machinery: The criteria for updating machinery will depend on the project and the geography in which it will be developed. The most sustainable option that the market can offer will be selected, taking into account the development and market penetration of electric, "zero emissions", and/or green hydrogen fuel cell in each site.
Green technologies	• Industrial production of green hydrogen. • Green hydrogen associated infrastructure.	**Target**: • Contribute to the decarbonization of the economy. • Increase sustainable mobility. 	• Design and construction of green hydrogen production plants. • Design and construction of green hydrogen transport infrastructures. • Design and construction of green hydrogen refueling infrastructures. • Potential production of green hydrogen projects will comply with the EU Taxonomy requirement of 73.4% life cycle GHG emissions reduction, regardless of project location.

Sustainable water and wastewater management	• Construction and maintenance of integrated water cycle, and water supply sources, storage, distribution, sewage network, water treatment, reclamation and reuse, piping, and sewage networks maintenance, (including renewal infrastructure).
	• Design, construction, desalination Plant Operation & Maintenance to produce drinking water and /or agricultural use water.
		Target:
		• Improved water quality in water supply and sanitation in towns and villages.
		• Reduction of water losses in pipelines.
		• Improved discharge quality in wastewater treatment.
		• Water supply for human consumption in areas with high water stress levels.
		• Water supply for agricultural use in areas with high water stress levels.
		 
			• The design, construction and renovation of the following types of infrastructure:
			  • Wastewater treatment plants.
			  • Pumping stations.
			  • Potabilization stations.
			  • Supply and sanitation pipelines.
			  • Water monitoring.
			• Design, construction, operation, and maintenance of desalination plants.
			• The criterion to be used to be considered as an sustainable water and wastewater management improvement is the EU taxonomy threshold or local equivalent standards, depending on project location.

Green Categories	Description	SDG and environmental objectives	Projects

Climate change adaptation	• Sustainable watershed restoration.
	• Construction maritime works.
	• Construction irrigation works.
	• Water pollution detection systems.
		Target:
		• Improved protection against climatic emergencies.
		• Adaptation to climate change.
		• Improved irrigation efficiency and reduction of water losses.
		• Reduced water consumption.
		 
			• Projects to restore and properly manage watersheds and river courses, planning water flows, flood plains, water quality and quantity, etc.
			• Infrastructures to regulate flood and flood flows, e.g. storm ponds.
			• Design and construction of the following types of infrastructure:
			  • Coastal protection works.
			  • Construction of breakwaters.
			  • Embankment heightening.
			  • Harbor enlargements, etc.
			• Design and construction of irrigation canals and pipelines.
			• Design, installation, maintenance, and management of automated water quality control systems.
			These projects will comply with the EU Taxonomy Substantial Contribution Criteria for climate change adaptation for the activities of **Flood risk prevention and protection infrastructure**, regardless of project location.

Terrestrial and aquatic biodiversity conservation	• Construction of green areas. • Recovery and restoration of wetlands.	**Target**: • Life on Land. • Adaptation to climate change. • Improved protection against climatic emergencies. 	• Development of parks, urban forests and linear parks that aim to recover landscape richness, natural processes and ecosystem services, responding to sitel-specific conditions and promoting biological diversity. • Recovery and restoration of wetlands. Eligibility Criteria includes Preservation of Parks, Gardens and Green Areas, conservation of biodiversity, improvement of water quality, climate change mitigation and adaptation. These projects will comply with the EU Taxonomy Substantial Contribution Criteria for climate change adaptation for the activities of Recovery and restoration of wetlands, regardless of project location.

Green Categories	Description	SDG and environmental objectives	Projects
Circular economy adapted products, production technologies and processes	• Manufacture of recycled pavements. • Development and manufacture of certified eco-labeled or eco-efficient products.	**Target**: • New products that contribute to the decarbonization of the economy. • Promote more sustainable production and consumption models, reducing the use of raw materials. 	• Design of new products and processes that improve recyclability and reduce waste generation. New products or services will have EU eco-labeling or LCA and EPD, as appropriate, or ISO certifications (14021, 14024, 14025, e.g.).

Social Categories

There are two groups of target population that will be benefit from Sacyr's eligible social projects:

Development of infrastructures in order to improve the quality of life of the general population of the country. In this case, social financing will be allocated to projects located in different countries considering the World Bank's classification, which categorizes countries based on their GNI per capita.

According to this analysis, Sacyr is present in Lower Middle Income Countries (Africa)and in Upper Middle Income Countries (South America). It is important to mention that Sacyr, in these countries and in High Income Countries, develops public infrastructures for general population including people:

- Living with limited financial resources or living below the poverty line.
- Excluded and/or marginalized populations and/or communities.
- People with disabilities.
- Aging populations and/or vulnerable youths.
- Other vulnerable groups and minorities.

Development of infrastructures located in any country where Sacyr develops its activity, aimed at a specific target population, under the criteria established in the social bond and loans principles previously mentioned. In this case, the company will rely on definitions of target population developed by international official institutions and corresponding national authorities or agencies in each country.

[1]Source: New World Bank country classifications by income level: 2023.

Social Categories	Description	SDG and social objectives	Target Population
Affordable housing	**Design, construction and operation and maintenance of affordable housing**. Residential buildings: • Social housing: Developed by administrations to enable citizens with lower incomes to buy or rent decent and adequate housing. • Residential infrastructure for seniors: Infrastructure designed to provide public services of accommodation and lodging, health care and personal care for the elderly population.	Develop affordable and accessible housing to improve people's quality of life. 	Citizens with lower incomes. The criteria to define this group of people will be established by the Central Bank of the country where the project is located. Elderly population. According to the World Health Organization[2], this group includes people aged 60 or over.

[2]Source: WHO Guidelines on Integrated Care for Older People (ICOPE).

Social Categories	Description	SDG and social objectives	Target Population
Affordable basic infrastructure	**Design, construction and operation and maintenance of systems and facilities that serve as the basis for the economic growth of a country.** Non-residential buildings developed by the administration and intended to provide publicly managed services: • Health infrastructure: Infrastructure to carry out public sanitation services that comply with coverage and quality parameters. This infrastructure is intended for the universal population of a country, including groups with a lack of quality access to essential goods and services, and increases in the case of developing countries. • Education-related infrastructure: Infrastructure as schools or universities designed to enable the general population, including people with limited financial resources who are beneficiaries of scholarships, to have access to public education. • Cultural, sports, and wellness infrastructure: Public infrastructure designed to host sport and wellbeing practices and develop artistic and cultural manifestations of the communities, including groups with limited financial resources: museums, libraries, theaters, sports centers, parks, etc. • Governmental infrastructure: Infrastructure designed to give public access to the general population for the exercise of different rights, such application for scholarships, financial aid, etc. • Transportation infrastructures: Infrastructure intended to give access to affordable and equitable transportation systems to the population, including those with limited economic resources (public transport, highways, railways, airports, ports, docks, maritime transport).	Development of accessible and affordable infrastructure in order to improve people's quality of life. 	Universal population of a country, including people with limited financial resources and with a lack of quality access to essential goods and services. The criteria to define this group of people will be established according to the Central Bank of the country where the project is located.

Expanding health and education infrastructure to foster equity and well-being

Social Categories	Description	SDG and social objectives	Target Population
Access to essential services	**Operation and maintenance of essential services.** • Water infrastructure: Infrastructure designed to provide public access to safe and affordable drinking water and an adequate and equitable sanitation.	Development of accessible and affordable infrastructure in order to improve people's quality of life.	Universal population of a country, including people with limited financial resources and with a lack of quality access to essential goods and services. The criteria to define this group of people will be established by the Central Bank of the country where the project is located.

Exclusion Criteria

As a general premise, Sacyr will not carry out any activity involving exploitation of human rights, modern slavery (e.g. forced labor or human trafficking), child labor or activities violating the rights of indigenous populations.

Likewise, Sacyr does not intend to include any of the following activities in its portfolio of sustainable financial instruments:

- In case of Social Financing, financial instruments for projects in high income economies as designated by the World Bank (excluding those described in the previous section)
- Financial instruments for projects supporting fossil fuel or coal energy generation
- Acquisition, leasing and renting of low-emission vehicles and machinery will only be considered green under this Framework if they comply with the best sustainable practices in the market
- Armaments and defense
- Alcohol, tobacco, gambling, or arms

Process for Project Evaluation and Selection

Sacyr identifies countries in which opportunities are present by conducting a profile analysis of the country, which includes reviewing the overall level of investment in the country and a screening of the country's legal framework.

At Sacyr, **we have an innovative and robust risk management framework** based on COSO and ISO 31000 standards, SGIR *(Sistema Integral de Gestión de Riesgos* - Integrated Risk Management System) and MyR!SK, our IT tool, which forms its backbone.

Our comprehensive risk management system has been designed to ensure compliance with evolving regulations and provide full assurance to our capital providers, including an integrated and holistic view of risks, as well as a third-party risk consideration. The SGIR is fully integrated into our decision-making model across the organization, aligning with our strategic plan, industry standards, and stakeholder expectations.

The **SGIR framework** provides project teams with the criteria, processes, tools, roles, activities and controls we use within our decision-making model throughout the whole lifecycle of a project to ensure informed decisions are escalated to the Investment Committee and/or the Risk Committee for approval where appropriate.

Sacyr stands out in the global infrastructure industry for its integrated, value-driven approach to Public-Private Partnership (P3) projects, **ensuring efficiency and sustainability at every stage of an asset's lifecycle**. This same rigor and innovation apply to our Risk Management System, which is designed to align with best-in-class ESG practices and sustainable finance principles.

A key element of Sacyr's commitment to sustainable growth is **a clear distinction between investment and risk management functions**, ensuring robust governance and independent oversight:

Investment Committee (IC): Ensures that all investment activities are fully aligned with the Group's strategic plan, investment policy, and sustainability guidelines. The IC plays a key role in selecting projects that comply with Sacyr's eligibility criteria for sustainable finance instruments.

Risk Committee (RC): Oversees risk strategy, governance, and management, ensuring that every project is thoroughly assessed for ESG compliance, financial viability, and long-term sustainability.

Verify compliance with environmental and social criteria required for Green/Social Project classification.

Assess the ESG credentials of potential partners, subcontractors, and clients.

Ensure that **selected projects align with sustainability frameworks** and international best practices.

Provide ongoing risk monitoring and reporting, ensuring continuous compliance throughout the project lifecycle.

ESG Integration in Project Selection & Evaluation

To identify eligible projects for sustainable financing, the RC engages a multidisciplinary team of internal and external experts, including professionals from Finance, Sustainability, Legal, Risk, Operations, Communication, Human Rights, and Compliance. These teams conduct in-depth due diligence and risk assessments to:

If the Eligibility criteria are met, these projects will be proposed to receive an allocation from the net proceeds from the Green or Social financial instruments and will be included in the portfolio of Green/Social projects.

With this structured and transparent approach, Sacyr guarantees that its sustainable finance instruments are deployed in projects that meet the highest ESG standards, **reinforcing our position as a responsible and forward-thinking industry leader**.

Management of Proceeds

The company **will track the use of proceeds of Green Financing instruments** under this Framework to make sure that they are used to finance or refinance eligible projects described under the “Use of Proceeds” section, for Green and Social projects.

The proceeds of facilities would be managed by facility (according to their label as Green or Social), in order **to manage the Sustainable Finance portfolio of the Group**, which incorporates loans, bonds, transactional products and others.

Sacyr will temporary hold in its liquidity portfolio, including cash, cash equivalent, and/or other liquid marketable instruments, the balance of nets proceeds not yet allocated to eligible projects. **Sacyr commits to not invest net proceeds in controversial activities** as defined in the “exclusionary criteria” described in the “Use of Proceeds” section.

As a general premise, Sacyr intends for the proceeds of any Sustainable financing to be allocated to Eligible Green or Social Projects within 24 months of the incurrence of the debt. However, specific cases may differ and will be assessed on an individual basis.

In the case of divestment or if a project no longer meets the criteria as an Eligible Green or Social Project, Sacyr intents to reallocate the funds to one or more other Eligible Green or Social Projects.

Reporting

Sacyr will incorporate **a “Sustainable Finance” chapter inside the Consolidated Statement of Non Financial Information and Sustainability Reporting** or other sustainability reports, that will be publicly available, which details on the allocation of the proceeds related to their Sustainable Portfolio, as well as a description of the projects and in the case of Social Facilities, a description of the target population beneficiaries of the projects. In the case of a Green/Social Bond issuance, an annual allocation report will be made publicly available within one year of the issuance until full allocation and on a timely basis in case of a material development.

The allocation report will include the following details:

- Total amount allocated to the Sustainable Portfolio.
- Total amount allocated to Eligible Projects (Green and Social) (Total).
- Share of new financing and refinancing.
- The amount remaining unallocated (If any).

Green financing proceeds are carefully tracked to guarantee they support eligible Green and Social projects

Impact Reporting

Sacyr will provide impact reporting and when feasible, including metrics regarding their Sustainable Portfolio, related to **environmental and social impacts**.

The aim of Sacyr is to disclose this information **aligned with the Handbook for Harmonized Framework** for Impact Reporting, for Green and Social Financings by ICMA, June 2023 version, where possible.

Examples of potential impact metrics for each Green and Social Categories:

Category	Potential Impact Metric
Renewable energy	• Annual generation (MW/GWh). • Avoided emissions (tons of CO_2e). • Renewable energy capacity installed or developed (MW/GWh).
Energy Efficiency	• Annual energy savings (MW/GWh). • Estimated Annual GHG Emissions reduced (tons of CO_2e). • ISO 50001 certified project to improve energy efficiency and reduce emissions.
Green buildings	• Design and construction of buildings following sustainability guidelines (sustainable certification). • Certification at least “Good” category in Breeam, Silver in Leed, etc. • Building surface (sqm).
Clean transportation	• Improvement of connections. • Number of passengers/year (no.). • CO_2 emissions reduction. (tons of CO_2e). • Emissions avoided (tons of CO_2e). • Number of recharging stations (points). • Power installed in recharging stations. • kWh refueled at charging points.
Green technologies	• Annual generation (electricity/other) (MW/GWh). • Annual green hydrogen production (MW/GWh). • CO_2 emissions avoided (tons of CO_2e). • Number of charging stations installed.

Category	Potential Impact Metric
Sustainable water and wastewater management	• Access to drinking water (no. of persons or equivalent number of inhabitants). • Reduction of pollution (DQO, DBO…). • ISO 50001 certified project to improve energy efficiency and reduce emissions. • Energy consumption of supplied water (kWh/m^3 supplied water). • Wastewater treatment energy consumption (kWh/population equivalent) and kWh saved. • Infrastructure Leakage Index level (ILI).
Climate change adaptation	• Intervened surface (sqm).
Terrestrial and aquatic biodiversity conservation	• Intervened surface (sqm).
Circular economy adapted products, production technologies and processes	• Percentage (or total weight) of waste reused, recycled, and recovered. • Percentage (or total weight) of waste destined for disposal. • Annual generation from non-recyclable waste (MW/GWh). • Waste reduced (tons). • Products changed to increase waste reduced.
Affordable basic infrastructure	• Number of people with access to affordable infrastructure (health or educational infrastructure, transport systems, etc.). • Kilometers of roads rehabilitated/constructed. • Number of beds in Hospitals. • Number of facilities/centers.
Affordable housing	• Number of dwellings or families benefiting from subsidized housing. • Number of houses.
Access to essential services	• Number of water infrastructure projects built/upgraded. • Number of people provided with adequate and equitable sanitation.

Affordable infrastructure that improves lives and enables opportunities

Sustainability -linked financing

05

Sustainability-linked financing

Key Performance Indicators (KPIs)

KPI #1: Scope 1 and 2 GHG emissions

Definition

Sacyr's Scope 1 and 2 greenhouse gas (GHG) emissions, measured in metric tons of CO_2e. We report the emissions as CO_2 equivalents (CO_2e) as per GHG Protocol's guidance.

Scope/Perimeter

The KPI covers Sacyr S.A. and its subsidiaries (hereinafter referred to as Sacyr). It includes 100% of Scope 1 and 2 GHG emissions from Group centers under the operational control approach in accordance with the consolidation scope of its financial statements, that is, on those activities/contracts over which it has the authority to introduce and implement its operational policies.

Scope 1

Direct emissions coming from sources owned or controlled by us. Our direct emissions emanate from our various operating centers and are associated with:

- **Fuel combustion from mobile sources**: emissions from fuel consumption associated with travel and machinery.
- **Fuel combustion from fixed sources**: emissions from fuel consumption associated with stationary or fixed equipment and fixed facilities.
- **Leaks**: emissions from leaks of cooling gases from air-conditioning equipment.

Scope 2

Indirect GHG emissions associated with electricity, including emissions from generating electric power we purchase and consume as a company. Indirect emissions come from our various operating centers and are associated with the electricity consumption of these facilities.

In June 2023, Sacyr reached an agreement to sell part of its Services business unit. This divestment process was framed in Sacyr's strategy to drastically reduce its net recourse debt and focus on infrastructure P3 projects with low carbon intensity as its core business, in line with our climate change strategy. This agreement entailed a change in the perimeter of the Sacyr Group.

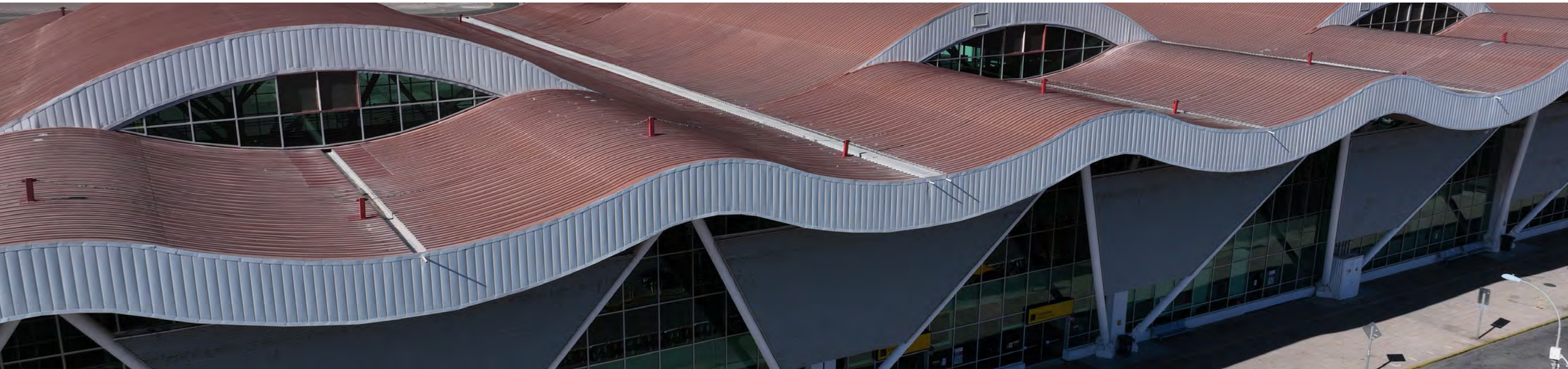
Furthermore, the publication of *Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards the rules for sustainability reporting* meant that in the 2024 report, Sacyr had to modify its calculation approach in which it had to continue to apply an operational control approach but in accordance with the consolidation scope of its financial statements. These changes were signicant and involved recalculating both the base year 2020 and the year 2024 and beyond, which led to the revalidation of the reduction targets by the SBTi initiative in early 2025.

Regarding the main contributors to Scope 1 and 2 emissions, construction-related activities are the largest contributors to Scope 1, while the activity of facilities related to the integrated water cycle contributes significantly to Scope 2 emissions.

Rationale and Materiality

Climate change is one of the greatest environmental, social and economic challenges facing humanity. At Sacyr we are aware that all agents within society must play a part in curbing its consequences, and for this reason we actively contribute to creating a sustainable future by minimizing the adverse environmental impacts of all the Group's activities and companies. With this objective in mind, we approach carbon management from a cross-cutting or horizontal angle, in accordance with the relevant regulatory frameworks and the recommendations of international experts on climate change.

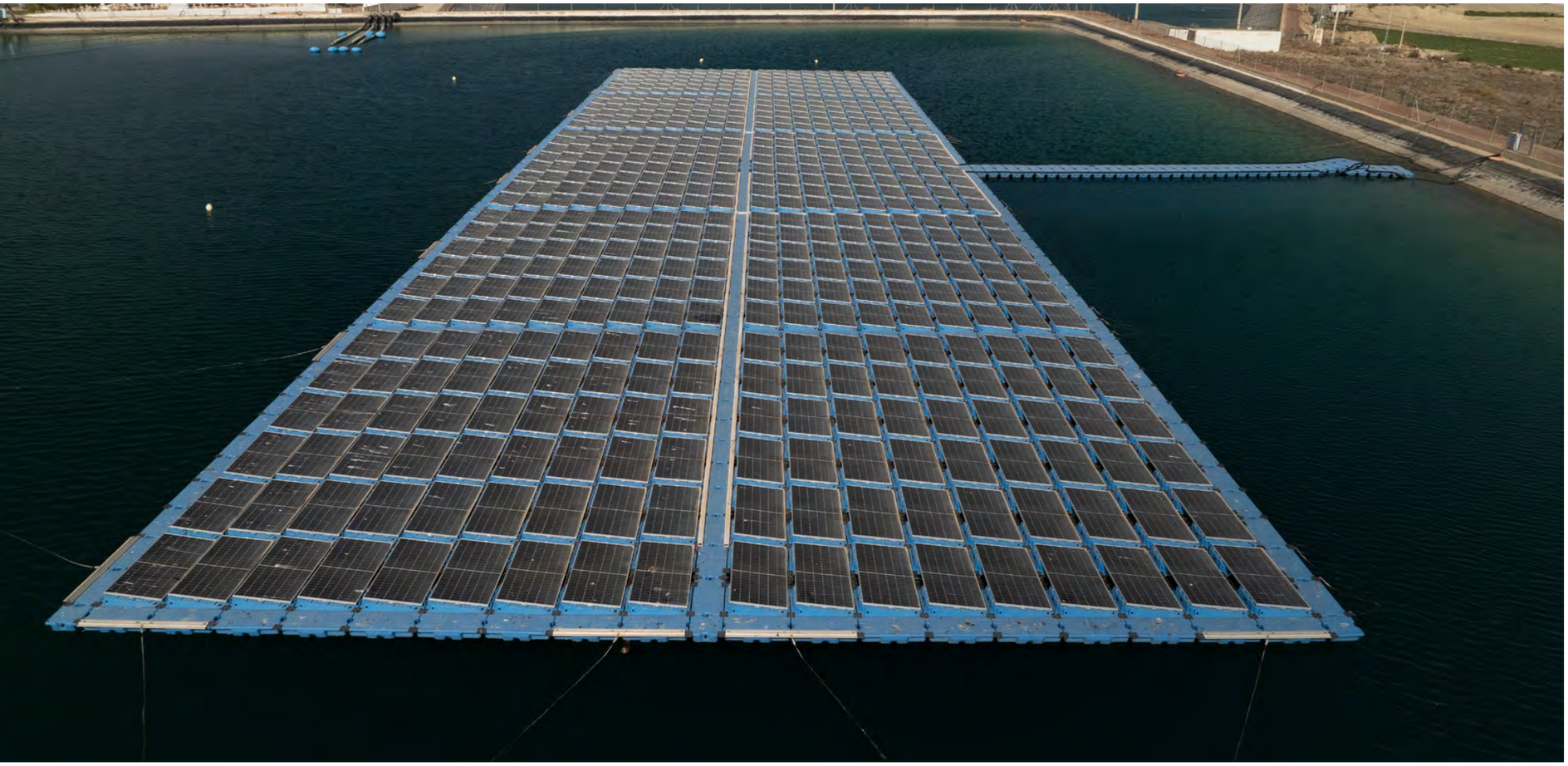
Sacyr performs a materiality analysis based on the concept of double materiality. The "Climate change and energy efficiency" topic is still the most important aspect. This ranking of material topics evidences our unwavering



commitment to the environment and to transparency towards our stakeholders.

For years, **Sacyr has been calculating the greenhouse gas emissions generated by its activities**. This measurement allows us to gage our impact, detect the most emissions-intensive activities and establish mitigation measures in keeping with our objectives. At Sacyr, we are committed to fighting climate change, with the goal of becoming carbon neutral by 2050. To meet our goals, we have devised a plan as part of our Climate Change Strategy. Under this framework, we develop various lines of action and specific initiatives, along with the relevant KPIs to measure performance. In 2021, we already exceeded our targets for 2025, reducing Scope 1 and 2 emissions by 32% compared to 2016. Accordingly, we updated our targets, which are endorsed by the SBTi (Science-Based Targets initiative), the benchmark for setting emissions reduction targets in line with what climate science considers necessary if we are to comply with the Paris Agreement. In 2022, we updated our 2021-2030 Climate Change Strategy, integrating the SBTi targets and increasing our ambition, taking 2020 as the baseline year and in 2025 Sacyr has revalidated this target in accordance with our Recalculation Policy and the new approach proposed by ESRS. Therefore, Sacyr commits to reducing absolute Scope 1 and 2 GHG emissions 42% by 2030 from a 2020 base year.

The KPI is relevant and material to Sacyr's business as **it clearly ties into our strategy of moving society towards a sustainable future** by developing and managing infrastructure that generates a positive environmental impact for the benefit of all our stakeholders while at the same time minimizing our footprint by actively and continually managing that footprint. Therefore, the reduction of GHG emissions is essential due to its high materiality, frequent use in the market and the ability to be externally benchmarked.



Contribution to UN SDGs

Our commitment to greenhouse gas reduction directly addresses three UN Sustainable Development Goals:

Affordable and clean energy.

Industry, innovation and infrastructure.

Climate action.

Methodology

Our approach to measuring greenhouse gas emissions **follows the Greenhouse Gas (GHG) Protocol** developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). We use the following two standards[3]:

The Greenhouse Gas Protocol. A Corporate Accounting and Reporting Standard.

GHG Protocol Scope 2 Guidance. An amendment to the GHG Protocol Corporate Standard.

[3]More information on Carbon Footprint calculation: https://sacyr.com/en/environment/climate-change (sacyr.com).

Historical Performance

The indicator and historical values **have been submitted to an independent review** in accordance with the ISAE 3410 standard “Assurance Engagements on greenhouse gas statements”, as part of our Consolidated Statement of Non-Financial Information and Sustainability Reporting and other reports.

Scopes 1 and 2 (tCO_2eq) SBTi pre-ESRS				
Base year 2020	2021	2022	2023	2024
410,091.20	393,653.73	373,479.21	347,381.33	336,079.23
Annual change	-4.0%	-5.1%	-7.0%	-3.3%
Variation with respect to base year 2020	**-4.0%**	**-8.9%**	**-15.3%**	**-18.0%**

[4]European Sustainability Reporting Standards.

The divestment of part of the Services business line and investees represented a change in base year emissions. Furthermore, in compliance with *Delegated Regulation (EU) 2023/2772 (ESRS)*, the emissions calculation for the year 2024 and subsequent years must be performed by applying the operational control approach in accordance with the consolidation scope of the financial statements. Therefore, these changes were signifant and the recalculation of both the base year 2020 and 2024 is performed under these criteria:

Scopes 1 and 2 (tCO_2eq) SBTi	
Base year 2020	2024
364.208,97	274,993.01
Variation with respect to base year 2020	**-24.5%**

KPI #2: Scope 3 GHG emissions

Definition

Sacyr’s Scope 3 greenhouse gas (GHG) emissions, measured in metric tons of CO_2e. We report the emissions as CO_2 equivalents (CO_2e) as per GHG Protocol’s guidance.

Scope/Perimeter

The KPI covers Sacyr S.A. and its subsidiaries (hereinafter referred to as Sacyr). It includes the Scope 3 GHG emissions from purchased goods and services, fuel and energy-related activities (not included in Scope1 or Scope 2) and waste generated in operations from Group centers under the operational control approach in accordance with the consolidation scope of its financial statements. This is, on those activities/contracts over which it has the authority to introduce and implement its operational policies.

Rationale and Materiality

For years, **Sacyr has been calculating the GHG emissions generated by its value chain**, which account for 86% of the emissions associated with the Group. This measurement allows us to measure the impact associated with our upstream and downstream suppliers, employees, customers and other stakeholders and to establish mitigation measures in line with our targets. Under its Climate Change Strategy Sacyr develops several lines of action and specific initiatives, along with relevant KPIs to measure performance. In 2021, Sacyr calculated for the first time the 15 Scope 3 categories defined by the GHG Protocol and validated for the first time a Scope 3 reduction target endorsed by the SBTi (Science-Based Targets initiative). In 2025 Sacyr has revalidated this target in accordance with our Recalculation Policy and the new approach proposed by ESRS. Sacyr is therefore committed to reducing absolute Scope 3 GHG emissions by 25% by 2030 from a 2020 base year. In accordance with SBTi, this target includes more than 67% of total Scope 3 emissions with its categories 1 - Purchased goods and services, 3 - Fuel and energy-related activities (not included in Scope 1 or Scope 2) and 5 - Waste generated in operations.

Contribution to UN SDGs

Our commitment to greenhouse gas reduction directly addresses three UN Sustainable Development Goals:

Affordable and clean energy.

Industry, innovation and infrastructure.

Climate action.

Methodology

Our approach to measuring greenhouse gas emissions **follows the Greenhouse Gas (GHG) Protocol** (www.ghgprotocol.org) developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). We use the following two standards[5]:

The Greenhouse Gas Protocol. Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

The Greenhouse Gas Protocol. Technical Guidance for Calculating Scope 3 Emissions.

[5]More information on Carbon Footprint calculation: https://sacyr.com/en/environment/climate-change (sacyr.com).

Historical Performance

The indicator and historical values **have been submitted to an independent review** in accordance with the ISAE 3410 standard "Assurance Engagements on greenhouse gas statements", as part of our annual Consolidated Statement of Non Financial Information and Sustainability Reporting and other reports.

Scope 3 (tCO_2eq) SBTi pre-ESRS				
Base year 2020	2021	2022	2023	2024
3,290,391,40	2,705,734.37	1,682,657.26	1,411,059.26	1,568,605.50
Annual change	-17.8%	-37.8%	-16.1%	11.2%
Variation with respect to base year 2020	**-17.8%**	**-48.9%**	**-57.1%**	**-52.3%**

The divestment of part of the Services business line represented a change in base year emissions. Furthermore, in compliance with *Delegated Regulation (EU) 2023/2772 (ESRS)*, the emissions calculation for the year 2024 and subsequent years must be performed by applying the operational control approach in accordance with the consolidation scope of the financial statements. Therefore, these changes were significant and the recalculation of both the base year 2020 and 2024 is performed under these criteria:

Scopes 3 (tCO_2eq) SBTi	
Base year 2020	2024
1.822.095,11	1,595,018.90
Variation with respect to base year 2020	**-12.5%**

Sustainability Performance Targets (SPTs)

SPT#1: Reduce absolute Scope 1 and 2 GHG emissions by 42% by 2030 (vs. baseline year 2020)

The **SBTi** is a partnership between CDP, the United Nations Global Compact, World Resources Institute (WRI) and the World Wide Fund for Nature (WWF).

Targets are considered 'science-based' if **they are in line with what the latest climate science deems necessary to meet the goal in the Paris Agreement**: limiting global warming to 1.5°C above pre-industrial temperatures. To achieve this, greenhouse gas (GHG) emissions must halve by 2030 – and drop to net zero by 2050.

Sacyr's climate science-based targets are validated by SBTi and align with what climate science deems necessary to limit global warming to 1.5°C. Additionally, Sacyr has conducted a benchmark analysis in order to align with the sector and calibrate the targets.

With this, Sacyr reasserts its commitment to **reducing absolute scope 1 and 2 greenhouse gas (GHG) emissions by 42%** by 2030. This way, Sacyr is a step closer to meeting the goals set in the Paris Agreement after committing to establishing intermediate targets and designing a roadmap to science-based net-zero emissions.

Scopes 1 and 2 SBTi validated target (tCO_2eq): reduction of 42% 2020-2030						
Base year 2020	2025	2026	2027	2028	2029	2030
364,208.97	287,725.09	272,428.31	257,131.53	241,834.76	226,537.98	211,241.20
Variation with respect to base year 2020	**-21.0%**	**-25.2%**	**-29.4%**	**-33.6%**	**-37.8%**	**-42.0%**

To achieve this target, we have a **Decarbonization Plan** that includes different initiatives and projects, aligned with our Climate Change Strategy. These initiatives are coordinated by different working groups, made up of specialists representing the different business areas that make up the Sacyr Group. The main initiatives to reduce our Scope 1 and 2 emissions are focused on increasing energy efficiency, the consumption of energy from renewable sources and the promotion of sustainable mobility.

We compile **an annual inventory of our greenhouse gas emissions** following the GHG Protocol methodology and submit it to an independent review in accordance with the ISAE 3410 standard "Assurance Engagements on greenhouse gas statements". Both the inventory and this verification report are published in our Consolidated Statement of Non-Financial Information and Sustainability Information each year.

Our emission targets shape a clear path toward reduction

SPT#2: Reduce absolute Scope 3 GHG emissions by 25% by 2030 (vs. baseline year 2020)

As with Scope 1 and 2, Scope 3 target is validated by the SBTi initiative, and a benchmark analysis has been conducted in order to align with the sector and calibrate the target. With this, Sacyr reasserts its commitment to **reducing absolute Scope 3 greenhouse gas (GHG) emissions by 25%** by 2030.

Scopes 3 SBTi validated target (tCO_2eq): reduction of 25% 2020-2030						
Base year 2020	2025	2026	2027	2028	2029	2030
1,822,095.11	1,594,333.22	1,548,780.84	1,503,228.47	1,457,676.09	1,412,123.71	1,366,571.33
Variation with respect to base year 2020	**-12.5%**	**-15.0%**	**-17.5%**	**-20.0%**	**-22.5%**	**-25.0%**

In accordance with SBTi, this target includes more than 67% of total Scope 3 emissions with its categories 1 - Purchased goods and services, 3 - Fuel and energy-related activities (not included in Scope 1 or Scope 2) and 5 - Waste generated in operations.

To achieve this target, we have a **Decarbonization Plan** that includes different initiatives and projects, aligned with our Climate Change Strategy. These initiatives are coordinated by different working groups, made up of specialists representing the different business areas that make up the Sacyr Group. The main initiatives to reduce our Scope 3 emissions are focused on increasing energy efficiency, the consumption of energy from renewable sources, evaluation of suppliers and sustainable purchases and increase of treatments such as reuse, recycling or recovery of waste generated in operations.

Recalculation Policy

The KPIs and the SPTs set out in this Framework may be changed and recalculated at the occurrence of any significant change in:

- The calculation methodology of the KPI.
- The change in applicable laws, regulations, guidelines and policies which are required for the determination of the KPI and/or the SPT.
- The data due to better data accessibility and accuracy or discovery of data errors.
- The perimeter of Sacyr Group due to any acquisition, demerger, merger, corporate reconstruction, divestiture, or disposal, where any such change is defined as significant.

Sacyr may also choose to recalculate the baseline and/or SPT for changes that will consider a modification of more than 10% in the baseline or SPTs. In such event these will be revised in good faith and amend this Framework.

Financial Characteristics

Sustainability-linked financing instruments will incorporate the KPI described in the section “a. Key Performance Indicators (KPIs)”, as specified in the legal documents (policies and contracts) of the sustainability-linked financing instruments.

In line with market practices, Sacyr is committed to **incorporating an ESG structure** that involves a step up / step down in the margin, which will be linked to the sustainability performance of the Group or its subsidiaries.

In the case that Sacyr cannot calculate or observe the SPTs in a satisfactory manner, a fallback mechanism clause will be included in the documentation with the explication of the different scenarios where it would be applicable.

The number of SPTs will vary depending on the maturity of the contemplated Sustainability-Linked facilities. For each Sustainability-Linked facility issued under this Framework, the applicable SPTs and the dates at which compliance with the SPT will be assessed (the Target Observation Date(s)) will be detailed in the relevant documentation.

The interest coupon payable in respect of any Sustainability-Linked Bonds issued by Sacyr may be subject to a coupon adjustment in the event the applicable SPT in relation to the KPI are or are not achieved as of the relevant Target Observation Date(s).

Further information **will be provided in the specific documentation** relevant to each Sustainability-Linked facility issue.

Reporting

Sacyr will annually provide **sufficiently up-to-date information to monitor the performance of the KPIs** and to verify the accomplishment of the SPTs.

As transparency is of value in the Sustainable Finance market, Sacyr **commits to publicly report the information** by incorporating the KPIs into their Consolidated Statement of Non-Financial Information and Sustainability Reporting and other reports, which is verified by an external party.

This reporting would be published regularly, at least annually, in order to enable investors to monitor the progress of the SPT, especially when it is included in a facility. Also, this documentation will be shared annually with Sacyr’s lenders so they can confirm all the information and related impact to any Sustainability-Linked facility.

In case of a trigger event in a Sustainability-Linked Bond issuance that includes a coupon adjustment the performance of the KPI **will be verified by an external party** with relevant expertise.

The date on which Sacyr will publish the performance against the SPT will be at the time of publication of the Financial Reports, after the official external audit of our data by the external verifier. Each report will be available within 180 days from the end of each Financial Year and will include the data for the previous year ended on 31 December. Sacyr considers its Financial Year from January 1 to December 31, based on a natural year.

Sustainability-linked terms embed KPIs to ensure financing aligns with clear ESG performance

Verification

06

Verification

Sacyr has appointed DNV to provide an independent Second Party Opinion (“SPO”) report to evaluate this Framework and its alignment with the LMA and ICMA International Principles.

The SPO will be made publicly available on Sacyr’s corporate website, in the shareholders and investors section:

www.sacyr.com

If Sacyr updates its Framework, it will be subject to a new review from any qualified provider that could issue a Second Party Opinion.

Post-Issuance Review

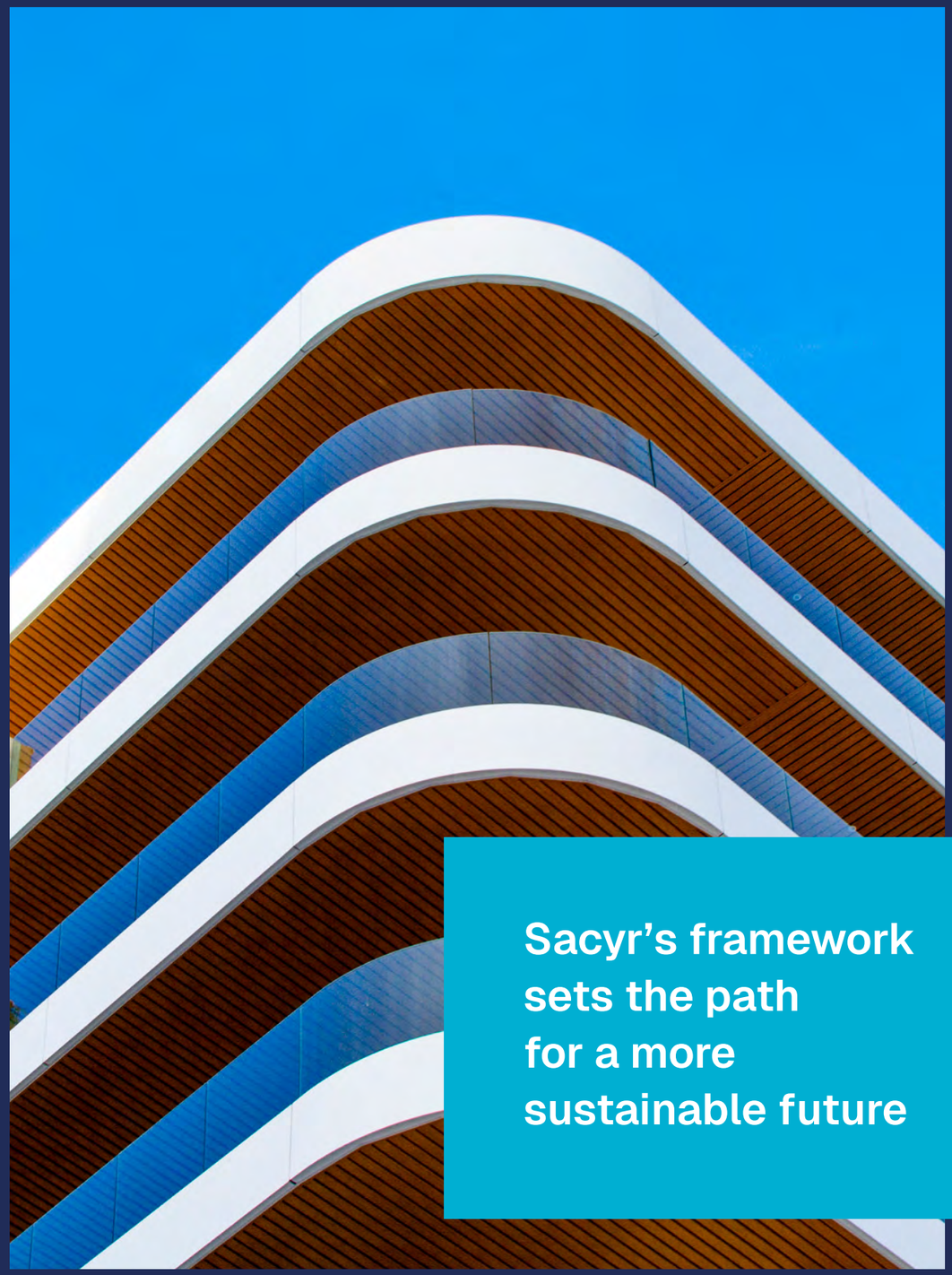
All information related to the reporting under this Framework will be incorporated in Consolidated Statement of Non Financial Information and Sustainability Reporting and other reports which will be verified by an external advisor of recognized prestige.

Amendments to this Framework

Sacyr will review the contents of this Framework from time to time, with a view to ensuring its ongoing alignment with updated versions of the GLP, GBP, SLP, SBP, SLBP and SLLP, and any relevant principles as and when they are available in the market.

Sacyr may also review this Framework in case of material changes in the scope, methodology, KPIs and/or the SPTs calibration. Such review may result in this Framework being updated and amended.

Any future updated version of this Framework, and its SPO, will be published on Sacyr’s website as well.



Sacyr’s framework sets the path for a more sustainable future

sacyr

Designed by Ecoavantis