

ARTIFICIAL INTELLIGENCE POLICY

The Board of Directors of Sacyr, S.A. (“**Sacyr**”), within the framework of its general and non-delegable powers to determine the general policies and strategies of the company and its group of companies (**the “Group”**), and following review and proposal by the competent Committee, has approved this *Artificial Intelligence Policy* (the “**Policy**”).

This Policy forms part of the Group’s corporate governance framework and sets out the general guidelines for the management and governance of Artificial Intelligence (AI), in accordance with applicable legislation, internal regulations and corporate values.

1. Purpose

The objectives of this *Policy* are:

- **Establish the general framework** governing the design, development, adoption, implementation, responsible use and supervision of AI systems and tools, promoting their integration into the Group’s activities in a coherent and controlled manner aligned with the business strategy, corporate values and the principles of sustainability and good governance.
- **Promote the application of AI as a** driver of innovation, productivity, operational efficiency, optimization of internal processes and the strengthening of the Group’s competitiveness, ensuring that its use is appropriate, responsible, safe, ethical and reliable in a professional context.
- **Establish the general principles of conduct** that must guide the use of AI by the employees and companies included within its scope of application, ensuring compliance with applicable legislation and internal regulations, as well as the protection of people’s rights, privacy, information security, operational safety, the Group’s reputation and the interests of all stakeholders.

2. Scope of application

This *Policy* applies to all entities belonging to the Sacyr Group, taking into account their specific characteristics. For the purposes of this document, the Sacyr Group is deemed to comprise all subsidiaries or majority-owned companies over which Sacyr, S.A. directly or indirectly exercises effective control, regardless of their geographical location, as well as the Sacyr Foundation.

This *Policy* also applies to the members of the governing bodies, executives and employees of the entities included in the Sacyr Group, irrespective of the territory in which they are located,

as well as to third parties, whether natural or legal persons, related to the Sacyr Group, insofar as the provisions of this Policy are applicable to them.

Its scope of application does not include subsidiaries or minority investee companies over which Sacyr, S.A. does not directly or indirectly exercise effective control. Such entities shall, where appropriate, have their own policies or internal regulations governing this matter, which may not in any case contradict the provisions of this *Policy*.

This Policy shall be adapted, where applicable, to the most stringent local legislation in force.

3. General principles

Through this *Policy*, Sacyr and the other Group companies assume and promote the following general principles in the field of Artificial Intelligence:

- a) **Responsible and ethical use:** AI shall be used responsibly, ethically, safely and reliably, in accordance with applicable legislation, internal regulations and corporate values, using only authorized tools for expressly authorized purposes and applying appropriate controls, including, where appropriate, review of outputs, to prevent errors, bias, infringements of intellectual property rights or adverse impacts on Sacyr or third parties.

Under no circumstances shall AI systems prohibited under the regulations applicable in the Group's different geographical locations be used, implemented or developed.

- b) **Traceability and transparency:** AI systems shall be transparent and traceable, with adequate documentation maintained on their operation, the data and methodologies used, and clear information provided when a person interacts with AI tools or when their use may influence processes, operations or decisions, including, where appropriate, third-party solutions.
- c) **Privacy and data protection:** privacy shall be respected and personal data protected in the design, development and use of AI systems, ensuring compliance with applicable legislation and internal regulations. The data processed must be adequate, relevant and limited to what is necessary, and its quality and integrity must be ensured throughout the system's life cycle.
- d) **Security and reliability:** information security and the reliability of AI systems shall be guaranteed throughout their life cycle, adopting the necessary measures to preserve the confidentiality, integrity, availability and quality of information, ensure proper functioning in accordance with their intended purpose, and prevent errors, misuse, alterations, unauthorized access, vulnerabilities and security or cybersecurity incidents.

The applicable security measures shall be established according to the risk level of each AI system and the potential impact that its use may have on users or on the Group's activities.

- e) **Inclusion and diversity:** inclusion, diversity, equal opportunities and non-discrimination shall be promoted in the development and use of AI systems, using appropriate data and criteria to identify, prevent and correct bias, and ensuring that their outputs do not generate discriminatory impacts or unduly affect people's rights.
- f) **Human oversight and control:** adequate human oversight and control over AI systems shall be ensured, so that their operation and outputs can be understood and, where necessary, reviewed, corrected or interrupted by persons with sufficient training and authority. AI should act as a support tool and must not replace human judgement or responsibility.
- g) **Training and awareness:** training and awareness shall be provided to people who develop, use or supervise AI systems, equipping them with adequate knowledge of their operation, risks, ethical, legal and security implications, and good practices for use, so that they can use these tools in an informed and safe manner and in accordance with applicable internal and external regulations.
- h) **Innovation and sustainability:** innovation and sustainability shall be promoted in the use of AI, directing its implementation towards solutions that deliver efficiency and operational improvement, and ensuring that its adoption and use are based on responsible use, proportionality and proper resource management.

4. AI Governance

The organizational structure for AI governance is articulated through the following bodies and responsible parties:

- **AI Committee:** responsible for promoting, coordinating and driving the effective application of this *Policy*, ensuring the implementation of the measures, controls, procedures and actions necessary for compliance, in accordance with applicable legislation and the Group's internal regulations.
- **Employees of the Sacyr Group:** responsible for applying this Policy within their respective areas of responsibility and collaborating with the AI Committee in the identification, assessment, implementation and monitoring of AI systems and tools.
- **Control and advisory functions:** the areas of Compliance, Legal, Data Protection (DPO), Information Security (CISO) and Internal Audit are responsible for supporting and supervising the application of this Policy within their respective areas of competence.

For the proper performance of these functions, Sacyr and the other Group companies shall make available the organizational, technical and material resources necessary to ensure the effective and adequate implementation of this Policy.

5. Monitoring, compliance and continuous improvement

This Policy shall be subject to periodic supervision and review, promoting the continuous improvement of the AI governance model in order to ensure its alignment with applicable legislation, internal regulations, corporate values and the evolution of Artificial Intelligence.

This **Artificial Intelligence Policy** was approved by the Board of Directors on 29 July 2026.