

CIRCULAR ECONOMY 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 *Circular Economy Policy* (hereinafter, the “**Policy**”).

The aim of this Policy, aimed at all stakeholders, is to define and establish the principles and criteria that govern actions regarding Circular Economy.

1. Purpose

The increase in demand for resources at a global level in recent decades has caused a notable acceleration in their consumption and it is essential to overcoming the classical linear and unsustainable model based on extracting, producing, using and disposing, giving way to the model of refusing, rethinking, reducing, reuse, repairing, refurbishing, remanufacturing, and recycling.

The circular model seeks the maximum use of resources and the least possible generation of waste, keeping the materials and derived products in circular processes, which allow them to be reintegrated into the value chain at the end of their useful life as consumer goods.

The circular model seeks to redefine growth while generating economic, natural and social capital. Through the implementation of this model the aim is to optimize production and consumption, reduce the use of resources, prevent and reduce waste generation and take advantage of the waste generated, recycling it or giving it a new life to turn it into new products.

Sacyr, aware of its responsibility and that the transition to the circular economy will only be possible thanks to the involvement of all society's agents, wants to contribute to a sustainable future, minimizing the environmental impact of all its activities and promoting actively and decisively as many actions are available for this purpose.

With this commitment, Sacyr demonstrates its faithfulness to integrating this circular economy model to achieve sustainable growth by incorporating circularity across the organization, in all its activities and business areas.

2. Scope of Application

This *Policy* applies to Sacyr and to all the companies in its Group. 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.



It does not apply to subsidiaries or companies in which a minority interest is held that are not effectively controlled by Sacyr directly or indirectly. These will have their own tax policies approved by their own competent bodies. Sacyr will encourage investee companies that are not part of the Group, particularly Sacyr's tax consolidation group, to implement similar reporting procedures.

3. General principles

To ensure the implementation of this commitment with Circular Economy, Sacyr and the other companies that belong to its Group shall follow the guidelines contained in the general principles below:

- a) Integrate the circular economy in the corporate strategy and in the decision-making process, as well as in the analysis and management of risks and opportunities.
- b) Effectively apply the principle of waste hierarchy: preventing the generation of hazardous, non-hazardous waste and construction and demolition waste, maximizing the readiness of all waste for reuse and recycling, promoting and enhancing other forms of recovery, including energy, and avoiding disposal.
- c) Move towards the abandonment of non-renewal natural resources, diminish the usage of renewable resources and reincorporate in the production cycle the materials contained in the waste as secondary raw materials.
- d) Increase the use of secondary (recycled) resources.
- e) Promote sustainable sourcing through the acquisition of materials and products that incorporate secondary resources in their manufacture, that are repairable and can be reused or recycled at the end of their use.
- f) Promote green design to reduce environmental impact in all stages of the product or service from the perspective of the life cycle.
- g) Foster the optimization in the use, production and consumption of resources, process efficiency, the use of renewable and low-emission energy resources and the implementation of more efficient technologies.
- h) Prevent and reduce food waste.
- i) Promote and support the innovation of processes and projects that boost circular economy.
- j) Promote awareness, consciousness-raising and training initiatives for our employees, end-users and value chain on practices for the optimization of resource use, waste prevention and management in accordance with the waste hierarchy, as well as those related to any of the principles of the circular economy.
- k) Encourage our collaborators to adopt actions consistent with this *Policy*.



- l) Encourage active and continuous communication on the achievement of the established objectives and Sacyr's actions regarding the circular economy.
- m) Promote voluntary adherence to collaboration agreements and alliances, of public or private nature, in order to assume commitments and define actions in line with the objectives of this Policy.
- n) Manage hazardous, non-hazardous, and construction and demolition waste according to domestic law, always in collaboration with authorized waste management companies and ensuring proper waste treatment.
- o) Comply with current legislation in all matters related to the circular economy in the countries and territories in which Sacyr operates, adopting also international commitments, standards and guidelines where there is insufficient legal development.
- p) Improve circularity management by establishing objectives and adopting action plans that allow for continuous monitoring and evaluation of its projects.

This *Circular Economy Policy* was approved on December 20, 2021 and was last amended by Sacyr's Board of Directors on December 18, 2023.