

DIVERSITY, EQUITY AND INCLUSION POLICY

The Board of Directors of Sacyr, S.A. ("**Sacyr**"), in the exercise of its general and non-delegable power to determine the company's overall policies and strategies, and following review and proposal by the relevant Committee, has approved this *Diversity, Equity, and Inclusion Policy* (hereinafter, the "**Policy**").

1. Purpose

This *Policy* establishes the guidelines and actions to promote a diverse, equitable, and inclusive corporate culture, contributing to the achievement of our purpose, mission, and corporate values, as well as to improved business performance. It aims to strengthen a sustainable, respectful, and high-performing work environment.

At Sacyr, we recognize and manage Diversity in a broad sense, understanding it as the sum of the multiple dimensions that shape each individual's identity and experience. These dimensions include, among others: visible diversity (demographic), as well as non-visible diversity (experiential and cognitive), including diversity factors such as gender, gender identity and expression, ethnicity, age, education, disability, religion, sexual orientation, personality, educational background, professional experience, and any other personal, physical, or social characteristic. This broad and inclusive approach enriches our teams and fosters innovation.

Inclusion is a fundamental pillar to ensure that all individuals fully participate in the organization, feel valued, and are empowered to contribute their best. Sacyr promotes collaborative, safe, and respectful environments free from biases, stereotypes, and any form of discrimination.

Equity provides the framework that ensures decisions and opportunities are based on objective criteria and that each person has the resources and support they need to reach their full potential, thereby ensuring equal opportunity.

2. Scope of Application

This *Policy* applies to all entities within the Sacyr Group, considering their specific characteristics and the local regulations of each country in which they operate, ensuring compliance with applicable laws and respect for cultural and legal diversity.

For the purposes of this document, the Sacyr Group comprises: (i) all subsidiaries or majority-owned entities over which Sacyr exercises direct or indirect effective control, regardless of geographical location; and (ii) Fundación Sacyr. Therefore, any reference in this *Policy* to the Sacyr Group includes all such entities and the Foundation.

Subsidiaries or companies in which Sacyr holds a minority interest and does not exercise effective control, either directly or indirectly, are not included within the scope of this *Policy*. These entities may have their own policies or internal regulations governing these matters, provided they are consistent with this *Policy*.

3. General Principles

To ensure the effective implementation of this *Policy*, Sacyr and all companies within its Group will be guided by the following general principles:

- a) Ensure compliance with laws and respect for fundamental rights.
- b) Guarantee a work environment based on dignity, respect, and equal treatment.
- c) Promote equal opportunities in all internal processes and prevent direct or indirect discrimination based on nationality, racial or ethnic origin, age, disability, religion, belief or opinion, sexual orientation or identity, gender expression, marital status, personality, or any other personal, physical, or social characteristic.
- d) Foster an inclusive culture that values diversity in all its dimensions, enriching the Company through diverse knowledge, skills, experiences, and perspectives, and enhancing innovation.
- e) Intersectional Approach: We acknowledge that individuals may simultaneously belong to multiple groups and may experience multiple or cumulative forms of discrimination.
- f) Promote decisions based on objective criteria, minimizing potential biases and supporting the personal and professional development of every individual.
- g) Engage the entire Company in diversity, equity, and inclusion, both in internal relations—regardless of role—and in relations with clients, suppliers, and other stakeholders, ensuring accessible and confidential communication channels.

4. Cross-cutting Approach and Lines of Action

Sacyr adopts an open, cross-cutting, and intersectional approach to diversity, understanding that its various dimensions interact and contribute to the Company's development through continuous improvement.

The following actions apply to all dimensions of diversity:

- Attracting and selecting talent through transparent and objective processes, free from bias, and guaranteeing equal opportunities and non-discrimination.
- Supporting onboarding processes, ensuring accessibility and providing reasonable accommodations where needed.

- Ensuring equitable access to professional development opportunities, assessing the knowledge and skills required for job performance, and evaluating goal achievement and performance.
- Promoting inclusive leadership as a core competency.
- Raising awareness and providing training throughout the organization.
- Fostering work-life integration for all employees.
- Promoting the use of inclusive language and communication.
- Measuring, monitoring, and regularly reporting on diversity, equity, and inclusion.
- Demonstrating our commitment both internally and externally, in collaboration with specialized organizations and alliances, including obtaining certifications and recognitions.

Communication and awareness-building activities are defined as a cross-cutting element supporting all the above actions, with the aim of disseminating and promoting this *Policy* within the Company and to its stakeholders.

This *Policy* will be reviewed periodically to adapt to regulatory, social, and organizational changes and to incorporate international best practices.

This *Diversity, Equity, and Inclusion Policy* was approved by the Board of Directors of Sacyr on July 29, 2020, and modified on December 18, 2025.