



INNOVATION POLICY

The Board of Directors of Sacyr, S.A. ("**Sacyr**"), within the framework of its general and non-delegable competence; to determine the general policies and strategies of the company and after reviewed and proposed by the competent Committee, has approved this Innovation Policy (hereinafter, the "**Policy**").

The purpose of this Policy is to define and establish the principles and criteria that govern actions in the field of Innovation according to its vision and strategy.

1. Purpose

At Sacyr, we define innovation as new ideas that, when applied to the business, generate value for our clients, shareholders, employees and society in general.

Our commitment to innovation is one of the strategic pillars to guarantee the competitiveness of our company in the short, medium, and long term. Similarly, the development of innovative solutions in our activities is an essential factor for improving our operations, processes, services, and business models in changing market conditions.

In the sectors that we compete in, where scientific and technological advances represent a differential value, Senior Management understands that implementing initiatives that promote the culture of innovation, the development of creativity, and relationships with other innovative agents in our environment is an essential priority in order to achieve the company's objectives. Likewise, the implementation of innovation projects with impact, value contribution to the business, and the provision of a common management system for the entire Group are also fundamental factors for the achievement of our strategy.

The innovation strategy established by Management is based on:

- **A strategic innovation** that affects all businesses and activities carried out by the Sacyr Group. This model is focused on sustainable development, taking advantage of opportunities and new business models, new technologies, and driving digital transformation.
- Innovation with a **vision of the future**, considering the new needs, habits, and trends of society.
- An **open innovation model** that fosters the creation of an ecosystem based on cooperation between external agents, such as entrepreneurs, scientists, universities and business partners; and the intra-entrepreneurs who are part of our success.
- Attracting the **best innovative talent** and developing our employees, regularly encouraging and challenging their ability to innovate and foster safe environments to create new value propositions.
- **The implementation of projects** that allow us to evaluate the impact of the most disruptive technologies in our activities, supported by new methodologies based on rapid decision making.
- A solid **process of valorization** of innovation through project certifications that bring external recognition to our system.



- All of the above is supported by an R&D&I management system in accordance with the UNE 166002:2014 standard, the purpose of which is to identify, manage, and maintain innovation activities and processes, control all possible technological resources more efficiently, and enable the company to acquire a greater capacity to adapt to new market environments.

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. Basic principles of action

In order to achieve the proper application of the goals included in this Policy, Sacyr and the companies belonging to the Sacyr Group will follow these basic principles of action:

- a) Implement an innovation management process and its governing bodies (Innovation Investment Committee and Innovation Operating Committee) that serve as a tool in the definition of strategic priorities, investment, technological and market alliances, as well as in the fulfillment and deployment of the Innovation Policy throughout the company.
- b) Periodically review the strategic priorities and capture the main challenges of the Group's subsidiaries on an annual basis. Provide the necessary economic and human resources for the effective development of our innovation strategy.
- c) To provide secure frameworks for innovation, establishing the appropriate tools for the development of pilot projects and for the rapid validation of hypotheses, minimizing risk, and ensuring the generation of value and the sharing of learning in the process.
- d) Promote a technological surveillance and foresight system that promotes the identification of opportunities and challenges for Sacyr and the detection of innovation needs in processes or services.
- e) Encourage collaboration and co-creation with external agents of the innovative ecosystem in order to develop new solutions that respond to the challenges and needs of the business.
- f) Incentivize innovation ecosystems and promote innovation in collaboration with start-ups, entrepreneurs and suppliers to develop new, disruptive and sustainable business models, promoting knowledge exchange.
- g) Develop high-impact solutions on sustainability and in alignment with the Strategic Plan that improve on process efficiency, the identification of new revenues or the pursuit of new business models.



- h) Promote an innovative culture throughout the organization that facilitates motivating work environments in order to encourage and recognize the generation of ideas and innovative practices carried out by employees.
- i) Identify the existing knowledge in Sacyr and its people in order to enhance the development as a tool for value creation.
- j) Disseminate internally the knowledge generated so that everyone is aware of the best practices applicable to their activity in the search for efficiency and effectiveness in all processes.
- k) Integrate innovation in all training contents through specific initiatives and programs for the development of capabilities.
- l) Protect the results of the innovation process, properly, and ethically managing intellectual and industrial property.
- m) Promote active participation in platforms, forums and congresses, generating alliances that allow us to multiply our innovative capacity.

This *Innovation Policy* was approved by the Board of Directors on October 1, 2020 and was last modified on December 22, 2022.