



POLICY ON INDUSTRIAL AND INTELLECTUAL PROPERTY AND OTHER INTANGIBLE ASSETS

Subsequent to review by the competent Committee and at the Committee's recommendation, the Board of Directors of Sacyr, S.A. has approved this *Policy on Industrial and Intellectual Property and Other Intangible Assets* (the "**Policy**") in the furtherance of its general non-delegable duty to set the SACYR Group's global policies and strategies.

1. Purpose

The purpose of this strategy is to define the principles and criteria that govern the management of the Intangible Assets of Sacyr, S.A. and its Group, as regards Industrial and Intellectual Property rights, Domain Names, and Trade Secrets, in an effort to centralise the management of all aspects concerning their identification, protection, operation, defence and appreciation, and thus minimise the risks arising from third-party deals that may affect these Intangible Assets.

2. Scope of application

This Policy applies to all SACYR Group entities, taking into account their unique characteristics. For the purposes of this document, the SACYR Group consists of (i) all subsidiary or majority-owned companies over which Sacyr, S.A. exercises effective control, directly or indirectly, regardless of geographic location, and (ii) the Sacyr Foundation. Therefore, any references this Policy makes to the SACYR Group will include the above companies and Foundation.

The scope of application does not include subsidiary or minority-owned companies over which Sacyr, S.A. does not exercise effective control, directly or indirectly. Such companies will have their own policies or internal regulations, which may not, under any circumstances, contravene that which is established in this *Policy*.

3. Definition of the Intangible Assets subject to this Policy

3.1. Introduction

Intangible Assets are the assets of a company that (a) have no physical substance, (b) add value to the company, (c) generate economic returns and comprise a portion of the company's market value, which is why they must be considered for accounting purposes. They are,

therefore, valuable assets that require proper identification, protection, and management.

3.2. Industrial Property

Industrial Property refers to a set of legal statutes granting the owner exclusive rights over the exploitation and/or use of an invention (patent, utility model), an industrial design, or distinctive symbol (trademark, trade name).

3.2. [sic] Intellectual Property

Intellectual Property refers to the rights associated with creations of the human intellect and the protection of the rights of authors of scientific, literary, or artistic works. For the purposes of the SACYR Group's activity, the following works will be considered subject to this type of protection: computer programs, reports, articles, projects, plans, mock-ups, architectural and engineering designs; charts, maps, and topographical/geographical designs, among others.

3.3. [sic] Domain Name

A Domain Name is a set of characters that identifies a website using an IP address and also serves as a product and service identifier, similar to trademarks.

3.4. Trade Secrets

This concept covers all the information that constitutes Trade Secrets, as established in Directive (EU) 2016/7943 of the European Parliament and of the Council of 8 June 2016 on the protection of undisclosed know-how and business information (trade secrets) against their unlawful acquisition, use, and disclosure, and Spanish law 1/2019 of 20 February on Trade Secrets, which transposes it into the Spanish legal system.

For the purposes of the Policy, Trade Secrets include information of a technological, industrial, organisational, financial, economic, or commercial nature that the SACYR Group or its companies may generate, which:

- a) is secret, in the sense that—as a whole or in the precise configuration and assembly of its components—it is not generally known or readily accessible to people within the circles that normally use the type of information in question;
- b) has substantial technical or commercial value; or
- c) has been subject to reasonable technical, contractual, and organisational measures to maintain its integrity and secrecy.

4. Objectives

Aware of the importance of the company's Intangible Assets, as they relate to Industrial Property, Intellectual Property, Domain Names, and Trade Secrets, the Board of Directors of Sacyr, S.A. aims to ensure their management and protection through this Policy by establishing the basic principles that allow, among others:

- I. The identification of the above Intangible Assets;
- II. A strategic assessment of the relevant Industrial and Intellectual Property registration actions or maintenance as Trade Secrets;
- III. Contractual relationships with third parties;
- IV. Management of the possible uses of the Intangible Assets, both within the Group and among third parties (licences, assignments, consortiums, technology transfers, etc.);
- V. Surveillance and defence of the above Intangible Assets.

5. General Principles

To implement the objectives included in this *Policy*, the actions of Sacyr, S.A. and its Group companies will be guided by the following general principles:

- Intangible Assets subject to the Policy will be managed centrally;
- Any activity in this regard must comply with the Purpose and Values cited in the Sacyr Group's Code of Conduct;
- To promote this Policy and effect the surveillance and supervision necessary for its compliance;
- To adapt and comply with the current legislation in the countries and territories where Sacyr, S.A. and its Group operate;
- To defend our rights over the above Intangible Assets with the existing legal means, while respecting applicable regulation and third-party rights.

6. Competent organic structure in the management of Intangible Assets

In accordance with the Sacyr Group's corporate structure and corporate governance, the following bodies have, among others, the corresponding functions and responsibilities:

- a) The Board of Directors of Sacyr, S.A. is responsible for approving corporate policies, among other functions;
- b) Among others, the function of the Sustainability and Corporate Governance Committee is to supervise and propose improvements to the norms that make up Sacyr, S.A.'s corporate governance system, for subsequent submission to the Board of Directors.
- c) The Intellectual and Industrial Property Office handles the centralised supervision

and control of the procedures concerning the Intangible Assets of Sacyr, S.A. and its Group referred to in this Policy.

The Office will have support from the heads of Intellectual and Industrial Property of the respective business units, as well as other corporate areas, including the Strategy, Innovation and Sustainability department, the Communications department, the Finance department, and ICT.

The Board of Directors of Sacyr, S.A. approved this *Policy on Industrial and Intellectual Property and Other Intangible Assets* on 20 December 2021.