



RISK CONTROL AND MANAGEMENT POLICY

The Sacyr, S.A. Board of Directors, within the framework of its general and non-delegable competence to determine the general policies and strategies of the SACYR Group and after review and proposal by the competent Committee, has approved this *Policy for Risk Control and Management* (hereinafter, the "**Policy**").

1. Purpose

The purpose of this Policy is to establish the basic principles and the general framework that should govern the actions of Sacyr and its Group for the supervision, control and management of risks of all kinds faced by Sacyr and its Group.

A risk is understood as the combination of the probability of an event taking place and the fact that it will have a negative impact on the objectives, on the Group's profit and losses, or on the execution of the strategy.

This *Policy* is aligned with the Purpose and Values enacted in the "SACYR Group Code of Conduct".

2. Scope of application

This Policy is applicable to all entities belonging to the SACYR Group, according to their own specifications. For the purposes of this document, the SACYR Group is considered to be comprised of (i) all subsidiaries or majority-owned companies over which, directly or indirectly, effective control is exercised by Sacyr, S.A., regardless of their geographical location, (ii) as well as the Sacyr Foundation. Therefore, all references in this *Policy* to the SACYR Group shall be understood to include all the companies listed above and the Foundation.

Not included in its scope of application are subsidiaries or companies in which Sacyr, S.A. does not exercise effective control, either directly or indirectly, and which shall have their own risk policies approved by their competent bodies. These risk policies must be in accordance with the principles contained in this *Policy*.

The Policy is developed and complemented through the specific policies that may be established in relation to certain risks, corporate functions or businesses of the Group and will maintain the three levels of defense of the Company.

3. Basic general principles

The SACYR Group, with a significant international presence, operates in different sectors, socio-economic environments and regulatory frameworks. In this context, there are risks of a diverse nature inherent to the businesses and sectors in which it operates. Consequently, the Group's risk management is carried out in each of the companies, taking into account their peculiarities as well as those of their sector.

The Sacyr Board of Directors, being aware of the importance of this aspect, undertakes to develop all its capabilities, within the framework of its competences, so that the risks of all the Group's activities and businesses are duly identified, measured, managed and controlled, as well as to establish, through this Policy, the basic principles for an adequate risk management that will allow:

- I. Achieving the strategic objectives established by the Group.
- II. Defending the interests of its shareholders and other Stakeholders.
- III. Contributing to the fulfillment of sustainability objectives (ESG).
- IV. Defending the Group's profits and losses and reputation.
- V. Guaranteeing business stability and financial soundness in a sustained manner over time.
- VI. Promoting knowledge and training of the risk culture among the Group's professionals.
- VII. Complying with all types of regulations applicable to the Group's companies in the countries where it operates.

The Board of Directors has the collaboration of the Audit Committee for the development and execution of each of the principles identified in this Policy. The Audit Committee, as a consulting body, supervises and reports on the adequacy of the internal control system and the management of significant risks, with the support of the Internal Audit Area and the heads of the different departments of the Group who are responsible for specifying the application of the specific internal rules for the control and management of the different risks, taking into account

the characteristics and singularities of the business itself as well as the country in which it is carried out and the basis of the principles established in this document.

Any action taken in the implementation of this Policy with the purpose of identifying, controlling and mitigating risks must comply with the following basic principles:

- a) Identify and assess the factors that may negatively affect the fulfillment of the objectives and which are specified in the risk map, grouped in different categories, together with an assessment of their possible impact and probability of occurrence, setting tolerance levels in the main risks.
- b) Adopting the necessary control measures to provide an effective response to these factors. The SACYR Group has individual and detailed risk maps for each business line and a global map drawn up at a high level for each of the types of risks concerned. This map includes a description of the controls associated with the risks that provide information on inherent risk and residual risk.
- c) Integrate risk control and management through an overall strategy that allows this variable to be incorporated into all strategic and operational decisions.
- d) Segregate the functions between the areas that take the risk and its registration in accordance with the applicable regulations in force at an operational level.
- e) Ensure a correct description and assessment of the mitigating controls of said risks, describe and test the controls and calculate the residual risks.
- f) Establish the response to the most relevant residual risks Risk management is the responsibility of all Group employees; each employee must understand the risks within their area of responsibility and manage them within the established tolerance limits.
- g) Report transparently on the Group's risks and the operation of the systems developed for their control to regulators and key external stakeholders.
- h) Ensure adequate compliance with the corporate governance rules established by the Company through its Corporate Governance System.

4. Risk groups

The risks to which the Group is subject are classified, based on the COSO (*Committee of Sponsoring Organization of the Treadway*) method, as external or internal depending on the source of the factors that cause them and, additionally, they may be strategic, operational or both. The SACYR Group uses the following classification:

- Group 1: Business environment (external and strategic).
- Group 2: Regulatory (external and operational)
- Group 3: Image and reputation (external, strategic and operational).
- Group 4: Human resources (internal and operational)
- Group 5: Operations (internal, strategic and operational)
- Group 6: Financial (internal, strategic and operational)
- Group 7: Information for decision making (internal and operational).
- Group 8: Information technology and systems (internal and operational).
- Group 9: Governance and management (internal and strategic)

As a general policy, an acceptable risk for the Group can be qualitatively considered as medium level, with the exception of regulatory risks (group 2) and image and reputation risks (group 3) where the Group reduces its risk tolerance to minimum levels. Depending on each specific type of risk, the risk is considered from a qualitative point of view (high, medium, low), or with a quantitative approach. For specific risks associated with measurable targets, the SACYR Group's risk tolerance is measured with the same units as the corresponding targets.

This *Risk Control and Management Policy* was approved by the Sacyr, S.A. Board of Directors on October 1, 2021.