



## UK and Australia Consolidated

### Modern Slavery Statement

THE SACYR GROUP

Financial year January 1<sup>st</sup> to December 31<sup>st</sup>, 2024

#### 1. About Sacyr

This Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (Australian MSA) and the United Kingdom's Modern Slavery Act 2015 (UK MSA). This is Sacyr's second Modern Slavery Statement under the Australian MSA and our fourth under the UK MSA. It covers the period 1 January 2024 to 31 December 2024.

This document sets forth the steps that Sacyr S.A. ("the Company", "we", "our" or "us"), has and will be taking to prevent slavery and human trafficking from occurring in our supply chains and businesses. Moreover, the statement discloses the steps Sacyr has taken to ensure there is no slavery or human trafficking in its supply chains or its own business.

#### 2. Business Structure, Operations, and Supply Chains

We are a global Group committed to meeting any challenge in order to transform our society and to develop complex infrastructure projects and services that contribute to improving citizens' quality of life in more than 30 countries, including the United Kingdom.

This Statement is made in accordance with the [Australian Modern Slavery Act 2018 \(Cth\) \(Australian MSA\)](#), and the [United Kingdom's Modern Slavery Act 2015](#) (UK MSA) (the "Act"), and Sacyr makes this statement on its own behalf as well as on behalf of its UK and Australian companies.

#### 3. The risks of modern slavery practices and actions taken in operations and supply chains

We consider slavery and human trafficking are very serious issues that must be addressed straight away. In order to avoid these problems within our organization, we have developed a proactive approach to monitor and control our activity at all times. As a construction firm, our suppliers play a crucial role in our activity, therefore they are a key priority for us, and we focus our efforts on reviewing and assessing our suppliers.

We are committed to avoiding all kinds of slavery and human trafficking in our organization and we have set out the foundations of our commitment in this statement.

Sacyr is committed to taking all appropriate steps to combat slavery and human trafficking. We are proud of the steps already taken and continually seek to improve our practices to combat slavery and human trafficking.

Among the principles that are the guideline and basis of [Sacyr Group Code of ethics and conduct](#) are those referring respect for human rights (page 13)



and we respect them wherever we carry out our activities. These are applicable to all subsidiaries or majority-owned companies over which effective control is exercised by Sacyr, S.A. whether directly or indirectly.

#### Risk area identification

Sacyr has compiled a [Risk Catalog](#), which it updates periodically, and which enables standardized and consolidated reporting at the project, business, and Group levels. The Catalog structures the types of risk, and classifies them five categories: [strategic](#), [financial and reporting](#), [operational and regulatory compliance](#) and [human rights](#).

In addition, the Catalog's structure considers the areas in which these critical risks could have a negative impact, including both the [economic-financial impact](#) (cash generation, cash flow, profit or loss, appropriation of funds, etc.) and the [impact on nonfinancial aspects](#) (deadlines, quality, stakeholder relations, health and safety, legal, environmental, social and/or corporate governance or reputational aspects, etc.).

The prioritization of the critical risks identified is based on their level of criticality, obtained from the combination of the impact assessments (considering the different areas of impact described above) and the probability that the risks will occur.

The risk catalog includes specific risks related to human resources, environment, business behaviour, community involvement, corporate governance and human rights (**ESG risks**) for early detection and control of material issues in this area.

#### [4. Sacyr's Commitment to Combatting Slavery and Human Trafficking](#)

We are committed to implementing all the measures within our ability to combat slavery and human trafficking. We are proud of the steps we have already taken, and we continue to pursue this endeavor. Moreover, we ensure compliance with the International Labor Organization's (ILO) stipulations, particularly those related to child labor.

The Board of Directors of 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, approved a [Human rights policy](#). The aim of this Policy, targeted at all stakeholders, is to define and establish the principles and mechanisms that govern activities related to human rights.

Sacyr exercises its activities in a way that rigorously respects Human and Social Rights in the different supply chains and complies with the most demanding environmental and health and safety standards, all this based on transparency and continuous dialogue with the company's stakeholders (customers, suppliers, employees, shareholders, investors, etc.).



Sacyr's sustainability management system, and therefore our management of human rights, is also in line with the premises of international initiatives such as the Tripartite Declaration (International Labour Organization), the OECD Guidelines and the United Nations Universal Declaration of Human Rights.

In 2007, the Sacyr Group became a signatory of the Global Compact, promoted by the United Nations, and undertook to support and implement the ten ethical principles underpinning the initiative, ratifying its commitment to those principles every year.

In addition to this, the [Sustainability Policy Framework](#) strengthens our commitment to the fight against slavery and human trafficking.

The above [Sacyr Group Code of ethics and conduct](#) and [policies](#) apply to all the Sacyr Group companies.

### Accountability and governance

Sacyr has been strengthening its corporate governance bodies to further show its commitment to a more sustainable future. More precisely, it has set up a Sustainability and Corporate Governance Committee, reporting to the Board of Directors, and a Sustainability Committee.

With these new committees, Sacyr is aiming to make further progress in sustainability and in collaborating with all its stakeholders in the fight against climate change as well as in fostering diversity and a proper work-life balance, safeguarding health and safety and promoting the positive social impact of its activities.

### Due diligence

We have also defined criteria for identifying critical suppliers in the Construction business, which represents 91% of total procurement. Based on these overall ESG weighted evaluation criteria, 1.054 suppliers have been evaluated during the year 2024.

Once critical suppliers are identified they receive a questionnaire to pinpoint areas for improvement.

Finally, the results are reviewed by specialists to establish measures and inculcate Sacyr's standards and values for a fruitful and lasting relationship.

### Grievance and remediation

At Sacyr we have formal mechanisms in place enabling us to receive queries, claims and/or complaints through the Regulatory Compliance communication channels ([see page 21 section "09 Advice and Complaint Line. Whistleblowing channel"](#)). We also have a public number of more specific channels, including: [Shareholders and investors Corporate governance](#) and [Ethics Channel](#) is the Sacyr Group's preferred for making inquires or sending communications about possible breaches of our Code of Ethics and Conduct, as well as possible violations of regulations applicable to our activity.



Direct communication through contract managers. Sacyr has a procedure in place to deal with environmental complaints made directly against the contracts by clients, environmental bodies, the communities affected by our activities and other stakeholders.

#### 5. Sacyr's responsible supply chain management model effectiveness assessment

In 2022, we included an additional clause underpinning responsible and sustainable conduct in the value chain. Among the mandatory corporate policies that apply to our third parties are those issued in the area of regulatory compliance (crime prevention, anticorruption and antitrust), the Quality, Environment and Energy Policy, the policies concerning the environment (Water policy, Biodiversity policy, Climate Change policy, Circular Economy policy), the Supply Chain Management policy, the Human Rights policy, the Modern Slavery Statement, the Health and Safety in the workplace policy and the Diversity, Equality and Inclusion Policy, all of which are available on our website and on the [specific supplier website](#).

Through Sacyr's management areas, we implement measures for the approval, control and evaluation of our service and product suppliers, as well as measures for the control and management of risks associated with our partners and clients with the aim of ensuring alignment with our significant third parties in these matters.

#### Training

We also provide training on sustainability to our suppliers through the delivery of the Good Practices Manual, the course explaining these practices and other training on waste management, water management, safeguarding of biodiversity and so on. In addition to these, we provided training to our suppliers on human rights in accordance with [United Nations Global Compact](#).

#### 6. Engagement and Collaboration

Sacyr is engaged in several collaborative efforts in the Infrastructure sector and across industries, such as Forética ([Social impact cluster](#)), Seres Foundation ([Human rights Lab](#)) and [United Nations Global Compact](#).

#### 7. Consultation with Australian reporting entity

In Australia, consultation and collaboration took place between members of Sacyr's executive committee and those including the country manager and head of operations. This consultation concerned the preparation and implementation of our global continuous improvement initiatives undertaken in Australia in 2024. In addition, consultations were also undertaken in relation to the preparation of this statement.

This Modern Slavery Statement was approved by the Board of Directors on December 19, 2024, following a report from the Sustainability and Corporate Governance Committee.