

UK and Australia Consolidated Modern Slavery Statement

THE SACYR GROUP

Financial year January 1st to December 31st, 2025

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 third Modern Slavery Statement under the Australian MSA and our fifth under the UK MSA.**

It covers the period 1 January 2025 to 31 December 2025.

This document sets forth the actions Sacyr S.A. ("the Company", "we", "our" or "us") has taken—and will continue to take—to prevent slavery and human trafficking in our operations and supply chains, **in line with the heightened reporting expectations outlined by the [UK Government's 2025 updated guidance on modern slavery reporting](#).**

2. Business Structure, Operations, and Supply Chains

We are a global Group committed to developing infrastructure and services that improve citizens' quality of life in more than 30 countries, including the United Kingdom and Australia.

This Statement is issued by Sacyr S.A. on its own behalf and on behalf of its UK and Australian subsidiaries subject to the UK MSA and Australian MSA.

Our supply chain spans construction, services, concessions, materials, equipment, and professional services.

Given the breadth of these activities, we maintain strengthened due diligence systems to identify and mitigate human rights and modern slavery risks in accordance with updated 2025 international expectations.

3. Risks of Modern Slavery and Actions Taken

Sacyr recognises modern slavery and human trafficking as severe human rights violations requiring immediate and ongoing action.

We maintain a proactive, risk-based monitoring approach across projects and suppliers. As a construction-intensive group, our suppliers play a critical role in maintaining ethical, transparent and safe operations. Therefore, supplier assessment, monitoring and engagement remain top priorities.

We continue to strengthen our compliance with the International Labour Organization (ILO) standards, with particular focus on preventing forced labour, child labour and unfair labour practices.

Risk Identification

Sacyr's Risk Catalogue —updated periodically— enables consistent reporting at project, business and Group levels.

It incorporates ESG-specific risk indicators aligned with current global standards, including human rights, community impact, governance and employee wellbeing.

Critical risks are prioritised based on impact and likelihood, ensuring early detection and mitigation of modern slavery risk factors.

4. Sacyr's Commitment to Combatting Slavery and Human Trafficking

We remain firmly committed to taking all appropriate steps to combat all forms of slavery and human trafficking. Our actions are guided by:

- [The Sacyr Group Code of Ethics and Conduct](#)
- [The Human Rights and Community Policy approved by the Board of Directors](#)
- International frameworks (ILO, OECD, UN)
- UN Global Compact membership since 2007

Governance

Sacyr continues strengthening its governance structure, including:

- Sustainability and Corporate Governance Committee (Board level)
- Sustainability Committee (executive level)

These bodies oversee ethical conduct, sustainability performance, human rights safeguards and modern slavery oversight across all Group entities.

5. Due Diligence

We apply robust due diligence processes to suppliers, contractors and partners.

In 2025, we have updated and reinforced our ESG-weighted methodology to assess supplier criticality, ensuring modern slavery risks are identified earlier and with deeper accuracy.

Suppliers identified as critical receive detailed questionnaires assessing areas such as human rights, labour conditions and environmental performance.

All results are reviewed by specialists who recommend improvement actions to align suppliers with Sacyr's standards.

Grievance and Remediation Mechanisms

Sacyr maintains multiple channels for reporting concerns:

- Whistleblowing and Compliance Channels
- Ethics and Corporate Governance Channel
- Direct communication with contract managers
- Public environmental/stakeholder complaint mechanisms

We have strengthened internal response protocols to ensure timely investigation and remediation of any human-rights-related concern.

6. Effectiveness Assessment

To reinforce accountability, Sacyr requires suppliers to comply with corporate policies covering:

- Anti-corruption, crime prevention, antitrust
- Quality, environment, circular economy, biodiversity, climate
- Supply chain management
- Human rights and modern slavery
- Diversity, equality and inclusion
- Workplace health and safety

During 2025, Sacyr enhanced the monitoring procedures to ensure continuous alignment with updated global expectations on transparency and responsible procurement.

Training

Suppliers receive training materials on sustainability, human rights, good practices, environmental management and United Nations Global Compact guidance. **New training modules introduced in 2025 place stronger emphasis on risk detection, human rights due diligence and ethical labour practices.**

7. Engagement and Collaboration

Sacyr continues collaborating with:

- Forética (Social Impact Cluster)
- Seres Foundation (Human Rights Lab)
- United Nations Global Compact

Sacyr has expanded its involvement in sector-wide initiatives to reinforce collective action frameworks against modern slavery.

8. Consultation with the Australian Reporting Entity

Consultation processes were carried out between Sacyr's Executive Committee, the Australian country manager, operational leadership and compliance teams to prepare this Statement and align it with Sacyr's global human rights strategy. **These consultations also integrated updated reporting expectations applicable in both jurisdictions.**

9. Approval

This Modern Slavery Statement was approved by the Board of Directors on **December 19, 2025**, following review by the Sustainability and Corporate Governance Committee.

Updated as of March 24, 2026