



CORPORATE SOCIAL RESPONSIBILITY POLICY



1.- Definition

Sacyr, aware of the impact that its activity has on society, develops it assuming its responsibility with it. In this context, Sacyr and its group of companies (hereinafter "The Group" or "Sacyr Group") wish to contribute to the generation of sustainable value in the communities where they are present, assuming a global commitment to them. This commitment is established as the basis of Sacyr's business culture.

Sacyr, understanding sustainability as a catalyst element of its business model, exercises its activity 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 on the basis of transparency and continuous dialogue with the Stakeholders of the Company (customers, suppliers, employees, shareholders, investors, etc.).

2.- Principles

This Corporate Social Responsibility Policy (hereinafter, "CSR Policy") is in clear connection with the Sacyr Group's Code of Conduct, which includes, among others, the basic ethical principles by which it is governed.

Among such principles are:

- **Respect for legality.** The business and professional activities of the Sacyr Group will be carried out in strict compliance with current legislation in each of the countries and territories where they are developed.
- **Integrity.** Maintain an irreproachable behavior, necessarily aligned with ethics, rectitude and honesty, avoiding all forms of corruption and with respect to all the subjects involved.
- **Transparency.** Disseminate adequate and faithful information of the management, reporting clearly, truthfully and verifiably.
- **Security.** To provide optimal working conditions in terms of health and safety.
- **Respect for human rights.** All actions of the Group and its employees must observe scrupulous respect for the Human Rights and Public Liberties included in the Universal Declaration of Human Rights.

3.- Objectives

The CSR Policy defines the objectives and commitments that govern the relations of the Sacyr Group with its stakeholders in the areas of sustainability, social, economic and environmental.



The Group maintains a constant dialogue with its stakeholders in a way that helps it to know always the different expectations of these, trying to respond to the challenges posed by the companies where the Group is present.

Objectives and commitments:

1. **DIALOGUE AND ACCOUNTABILITY:** We want to be the reference of management of the sector through permanent dialogue with our stakeholders and a fundamental principle of transparency with all of them.
 - Solvency and long term: We are and always want to be a solvent business group, where financial prudence and long-term vision are characteristics that define us.
 - Listen: We remain attentive to the environment, we establish channels of communication permanently open.
 - Ethics: Zero tolerance to unethical behavior
2. **PEOPLE:** We want to put people at the center of our activities and be the first option for professionals in the sector
 - Security: Our permanent ambition is zero accidents.
 - Development: We strive to offer the best conditions of professional development.
 - Rights: We respect and protect the rights of those who work with us - Partners, contractors and suppliers.
3. **SOCIETY:** "We want to be closer to the societies where we operate"
 - Social value: We look for options in each project to provide more value to the society we perform.
 - Diversity: We promote diversity inside and outside the company.
4. **ENVIRONMENT:** "We want to provide the most efficient solutions"
 - Efficiency: Our commitment is to develop the most efficient option.
 - Impact: We always propose solutions with less impact on the environment.

As indicated, this CSR policy is aligned with the Sacyr Group's Code of Conduct, (whose basic ethical principles we gathered in the previous section) in which the principles and behavior guidelines are established with, among others, employees, customers, suppliers, social issues, environment, diversity, respect for human rights and prevention of illegal behavior, in accordance with the values of the Group.

The Group's action principles with its shareholders, as well as the information and communication channels with them, are included in the Communication Policy and contact with shareholders, institutional investors and voting advisors, which is published on its corporate website.

Likewise, the Group's practices in relation to its fiscal responsibility are included in its Corporate Tax Policy, also published on its website.



In addition to the above, Sacyr also contributes to the progress and welfare of the communities where it carries out its activities through its Foundation. Through the Sacyr Foundation, a wide range of initiatives within the social sphere can be grouped into two categories: (i) Innovation boost and (ii) social action.

On the other hand, the Sacyr Group adhered in 2007 to the Global Compact, promoted by the United Nations, through which the Group commits itself to support and implement the ethical principles based on universal declarations and conventions on human rights, labor standards, the environment and the fight against corruption.

Likewise, the 17 Sustainable Development Goals (SDGs) of the United Nations represent an additional guide to the CSR strategy to focus the Sacyr Group's efforts in the search for a better development of our communities.

4.- System for monitoring CSR practices with the Stakeholders

The implementation and development of the Sacyr Group's CSR policy is carried out through the corporate responsibility area integrated in the Communication Department, whose highest representative update the Board of Directors, through the Audit and Corporate Governance Committee, about the CSR Policy proposals as well as the CSR Plans.

To ensure an adequate decision-making process, the company has a CSR Committee composed of one or several representatives of each business area, as well as each of the corporate units most linked to the responsible management of the company, whose mission is to propose concrete lines of action in the field of CSR, collaborating with the Communication Department in the drafting of CSR plans. The approval of the CSR Policy corresponds to the Board of Directors of Sacyr, in accordance with Spanish Laws and the Regulations of the Board.

The Board of Directors receives a report on the follow-up of this policy through the Audit and Corporate Governance Committee, which is responsible for guiding and supervising the company's actions in CSR matters, reviewing policies and ensuring that they are oriented to value creation.

In addition to this, the Audit and Corporate Governance Committee will be informed annually by the Chairman of the CSR Committee of the CSR plans balance.

Annually, the market and society will be informed of the advances in this matter through the Integrated Report or other Sustainability Reports. These Reports are available to shareholders on the corporate website by the celebration of the General Shareholders' Meeting.

5.- Supervision mechanisms

As a mechanism for monitoring corporate ethics and conduct, the Sacyr Group has a Regulatory Compliance Unit (UCN), an internal body under the Audit and Corporate Governance Committee, whose fundamental role is to ensure compliance with the performance principles and standards of conduct included in the Sacyr Group Code of Conduct, in accordance with its Internal Regulations.



6.- General channels of information and communication

Transparency is a fundamental principle that inspires the Sacyr's communication with its Stakeholders, that is, with all those who, in one way or another, have a relationship with the Company.

Sacyr has different information, communication, contact and participation channels, ensuring its Stakeholders have the right channels to be informed.

Thus, publishing information related to society, in the field of corporate social responsibility, is carried out through the following channels:

- Corporate website: www.sacyr.com
- Integrated Report
- Sustainability Reports
- General meeting of shareholders
- Press releases
- Social and professional networks
- Shareholder's Office
- Intranet
- Internal communications
- Forums and professional conferences
- Phone: 915455000
- Email address: rcorporativa@sacyr.com

This Policy has been approved by the Board of Directors of SACYR, S.A. on December 14, 2017