

HUMAN RIGHTS POLICY

The Board of Directors at 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, has approved this *Human Rights Policy* (hereinafter, the “**Policy**”).

The aim of this *Policy*, aimed at all stakeholders, is to define and establish the principles and mechanisms that govern activities related to human rights.

1.- Purpose

The respect for Human Rights by Sacyr and in relation to any stakeholder is a fundamental value in the Group’s public pledge.

For many years, Sacyr has acknowledged the need to respect and enforce respect of Human Rights in all the territories in which it operates. In this regard, Sacyr’s pledge is manifested through this Policy that commits to the control and monitoring of Human Rights compliance in relation with the people who work in the organisation and in its name, as well as to the different stakeholders it deals with in carrying out its activity.

Sacyr, aware of its national and international responsibility concerning respect for Human Rights, wishes to contribute actively and resolutely to a sustainable future, ensuring the elimination of any conduct or activities by Sacyr and the companies of its Group that are not in keeping with this Policy, and to promote as many actions as possible within its scope in order to achieve this goal.

Through this Policy, Sacyr announces its public pledge, at the highest level, to accept its responsibility to respect Human Rights, contributing to the improvement of our environment, our society and our future

2.- General Principles

To ensure the implementation of this pledge, Sacyr and the other companies that belong to its Group shall follow the guidelines contained in the general principles below:

- a) Identify, prevent, mitigate and be accountable for the impact of all its operations and activities on human rights.
- b) Resolve, to the greatest extent possible, the negative consequences on human rights that they may have caused or have contributed to causing.
- c) Encourage training and awareness initiatives for Sacyr’s stakeholders in the area

- of Human Rights.
- d) Actively encourage a culture that promotes respect for Human Rights, as well as behaviour that encourages such respect.
 - e) Voluntary participation in public and private agreements, with a view to assuming commitments and defining actions with the aim of reducing conduct that deviates from this Policy.
 - f) Obtain and maintain certificates in accordance with internationally recognised standards.
 - g) Incentivise suppliers to adopt policies consistent with this Policy.
 - h) Comply with applicable requirements related to the respect for Human Rights, as well as monitor recommendations in this area, both nationally and internationally.
 - i) Active and ongoing communication of actions taken by Sacyr in relation with respect for Human Rights.

This *Human Rights Policy* was approved by the Board of Directors at Sacyr on June 11 2020.