



QUALITY, ENVIRONMENT AND ENERGY MANAGEMENT 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 *Quality, Environment and Energy Management Policy* (hereinafter, the "**Policy**").

The aim of this *Policy*, aimed at all stakeholders, is to define and establish the principles and criteria that govern activities related to quality, environment, and energy management.

1.Purpose

Sacyr and its group of companies ("**Sacyr Group**") accept quality, respect for the environment, energy efficiency and the high quality of testing services as fundamental factors in carrying out its activities, including distribution and logistics, for the purpose of achieving client satisfaction, complying with their requirements and user satisfaction, all under the fundamental premise of combining business with respect for the environment and improved energy performance.

Sacyr understands that quality, respect for the environment in which it operates, efficiency and sound energy management, as well as high-quality testing cannot be imposed from the outside, rather it should come from within Sacyr's human team, as a sign of identity, so it encourages everyone to embrace it in their working environment, and spread it extensively among its stakeholders.

To this end, Senior Management provides all human and material resources, since its core objectives include product compliance with client requirements and demands and compliance at the same time of all legal and statutory requisites as well as other requisites subscribed by Sacyr Group, as well as ongoing improvements to the System (in accordance with requirements of Standards ISO 9001, ISO 14001, ISO 50001, UNE 17025). In this regard, the Sacyr Group management is committed to the continual improvement of the quality management system, environmental management and to implement energy management through regular, annual reviews.

As a consequence, Sacyr Group's commitment to the protection of the environment and correct energy management, as well as its compliance with legislation, environmental and energy regulations and other requisites that the Sacyr Group subscribes in relation with its environmental impact and its energy uses and consumption, focuses on the ongoing improvement to environmental behavior and energy performance, as well as other environmental aspects, energy usage and consumption that are key to the activities carried out by Sacyr Group.



2. Scope of application

This *Policy* applies to Sacyr and to all the companies in its Group. For purposes of this Policy, the SACYR Group is to be understood to comprise (i) all subsidiary or majority-owned companies effectively controlled by Sacyr, S.A. directly or indirectly, irrespective of their geographical location and (ii) the Fundación Sacyr [Sacyr Foundation]. Therefore, all mentions of the Sacyr Group contained in this Policy are to be understood to refer to all the above companies and the Foundation.

It does not apply to subsidiaries or companies in which a minority interest is held that are not effectively controlled by Sacyr directly or indirectly. These will have their own tax policies approved by their own competent bodies. Sacyr will encourage investee companies that are not part of the Group, particularly Sacyr's tax consolidation group, to implement similar reporting procedures.

3. General Principles

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

- a) Plan and execute activities in an orderly, rational and defect-free manner, reducing the impact on the environment, optimizing investments and costs.
- b) Establish and monitor objectives and goals to ensure continuous improvement of environmental, energy and quality performance providing the necessary information and resources to achieve them.
- c) Prevent and improve waste management, applying suitable measures for the reduction, recovery and recycling of said waste, ensuring the correct elimination of non-recoverable waste.
- d) Prevent contamination in the environment in general (underground and surface water, on the ground, in the atmosphere).
- e) Maintain fluent communication with clients in order to attend to their needs, requirements and expectations as to maximize their satisfaction and to earn their loyalty. Act responsibly and transparently at all times to ensure impartiality, confidentiality and commitment to client satisfaction.
- f) Step up communication with Public Administrations, neighborhood associations and non-government organizations regarding environmental issues of common interest.
- g) Support the acquisition of energy-efficient and environmentally friendly products and services, as well as designs to improve Sacyr Group's environmental and energy performance.
- h) Encourage and raise awareness among staff as to the monitoring of quality procedures and the use of the most appropriate environmental techniques and products, without it resulting in any decrease in creativity or in innovations that arise from an ongoing improvement process of the system.



- i) Inform, train and raise awareness among staff of the importance of correct energy management and of the impact of their activities on the organization's energy performance.
- j) Reduce the gas emissions, including GHG emissions as well as other polluting gasses, such as NOX, SO2, CO, COV and particles.
- k) Reduce the consumption of natural resources, through the use of recycled and/or recyclable products and promote energy savings and a circular economy through priority actions in waste management.
- l) Create a select team of collaborators, with quality, environmental and energy saving criteria, in accordance with Sacyr Group criteria, to optimize the appropriateness of activities, in terms of their durability, cleanliness, final finish, respect for the natural environment and energy efficiency integrating them in this *Policy*.
- m) Ensure that all staff know, understand, and apply specifications, regulations, methods, procedures and policy in accordance with the System in a logical and rational manner, ensuring a priori self-regulation of activities to minimize or eliminate the need for corrective action.
- n) Collaboration with suppliers to make respect for the environment a principle that guides their acts.
- o) Maintain and continually improve the technical competence of official laboratories through the definition of valid methods, the participation of staff who have the appropriate technical competence, ensuring valid test results for participation in external quality verification exercises, the use of suitable means and equipment, the provision of suitable facilities and the application of strict controls that facilitate areas for improvement in activities to be identified.
- p) Respect current environmental regulations in countries in which Sacyr Group operates and comply with commitments voluntarily acquired regarding the environment.
- q) Performing tests and inspections, within the scope of the ENAC validation, shall be performed in accordance with this Policy and with UNE 17025 standard requisites.
- r) Promote that the principles included in this Policy are adopted by business partners (non-managed operations, joint ventures, other similar associations, etc.).

This *Quality, Environment and Energy Management Policy* was approved on February 12 2015, and was last modified by the Board of Directors on December 18, 2023.