



## FINANCIAL DISCLOSURE POLICY

Subsequent to review by the competent Committee and at the Committee's recommendation, the Board of Directors of Sacyr, S.A. ("**Sacyr**") has approved this *Financial Disclosure Policy* (the "**Policy**") in the furtherance of its general non-delegable duty to set the company's global policies and strategies.

The purpose of this *Policy* is to define and establish the principles and criteria that govern actions pertaining to the disclosure of financial information.

### **1. Purpose.**

As a strategic objective, Sacyr aims to maximize the disclosure of financial information to markets, investors, and other stakeholders, while focusing continually on the quality and transparency of this information.

This *Policy* aims to establish the directives and guidelines concerning financial disclosure applicable to Sacyr and the other companies of its group ("**Group**"), in line with the current legislation of those countries where Sacyr conducts its activities, good corporate governance practices, and Sacyr's own corporate governance system.

Thus, the main objective of the disclosure process is to ensure that the consolidated financial information published by Sacyr for the benefit of the market, investors, and other stakeholders, is of high quality and reflects, in all significant respects, the true image of the equity, economic/financial position, profit, and cash flows of the companies included in the consolidation.



## **2. General principles.**

To implement the objectives included in this *Policy*, the actions of Sacyr and its Group companies will be guided by the following general principles:

- Economic/financial information encompasses all the economic/financial data of Sacyr and its Group that are reported to the market, investors, and other stakeholders in accordance with current legislation;
- The disclosure of economic/financial information to the market, investors, and other stakeholders will be based on the principles of transparency, veracity, immediacy, and equality, through the use of the appropriate channels.

## **3. Disclosure channels.**

The disclosure of economic/financial information is conducted through the following channels that aim to maximize reporting and the quality of the information available to the market, investors, and other stakeholders, without prejudice to the use of other channels, depending on the technology, available resources, and latest trends in communication.

### **3.1 Spanish National Securities Market Commission and other bodies.**

The Spanish National Securities Market Commission (*Comisión Nacional del Mercado de Valores*, “CNMV”) is the Company’s main reporting channel to shareholders, institutional investors, and markets, with the dissemination and availability to the public that information submitted to the institution immediately acquires as per current legislation. Communications submitted to the CNMV regarding the Company are immediately posted to the corporate website.



### **3.2 Sacyr's corporate website.**

Sacyr has a corporate website ([www.sacyr.com](http://www.sacyr.com)) available to the market, where it publishes and updates all financial information of interest, ensuring its quality, transparency, and veracity. Recipients of the information will have the option to immediately access all current data, in addition to specific publications and figures, with the possibility of subsequent consultation.

The information published on the corporate website is available in Spanish and English, with the Spanish version prevailing in the event of discrepancy.

### **3.3 Information on social networks.**

In accordance with CNMV criteria, the use of social networks is permitted to communicate financial information, as a channel in addition or complementary to the CNMV. However, information classified as "privileged" must adhere to the following requirements:

1. That the disclosed information is complete, objective, and clear; and that no additional sources need be consulted for its full understanding;
2. That the message clearly labels the data as "privileged information" and is separated from any promotional or marketing communication;
3. That the Company is clearly identified;
4. That it appears on a social network with widespread distribution and on accounts with a very large following;
5. That it is communicated formally and accurately, and no information is added or qualified in response or in conversation that is necessary to understand the information.



### **3.4. Disclosure through specific meetings.**

The Company regularly organizes, proactively and upon request, in-person and/or virtual meetings, conference calls, and roadshows with institutional investors, financial institutions, asset managers, financial intermediaries, and other market players, in order to present economic/financial information (among other data) in a space designed to promote dialogue, wherein the comments and queries of participants can be addressed personally.

### **3.5. Annual General Meeting of Shareholders.**

Given the legal nature of the Company and its Group, each year Sacyr holds an Annual General Meeting of Shareholders, which serves as an excellent forum in which to exchange information between the Company and the shareholders who represent its capital and other stakeholders, thanks to the publication and distribution of all the Group's economic/financial information.

### **3.6. Other external communication channels.**

The Company has open communication channels to address specific requests for financial information, with email addresses enabled for this purpose, including:

Investor Relations: [ir@sacyr.com](mailto:ir@sacyr.com); and Shareholders: [accionistas@sacyr.com](mailto:accionistas@sacyr.com).

### **3.7. Internal channels.**

Sacyr has internal channels through which it communicates with employees, as one of its stakeholders that requires more attention and information. The same criteria of equality, veracity, and transparency apply to the use of internal channels, including the Mysacyr intranet, newsletters, and mailings.



The Board of Directors of Sacyr approved this *Financial Disclosure Policy* on 17 December 2020.