

## FINANCIAL, NON-FINANCIAL AND CORPORATE, AND SHAREHOLDER, INSTITUTIONAL INVESTOR, AND SACYR PROXY ADVISER COMMUNICATIONS POLICY

Following review by the competent Committee and at the Committee's recommendation, the Board of Directors of Sacyr, S.A. ("**Sacyr**") has approved this *Financial, Non-Financial and Corporate, and Shareholder, Institutional Investor, and Proxy Adviser Communications Policy* (the "**Policy**") in the furtherance of its general non-delegable duty to set the Company's global policies and strategies.

### 1. Purpose

Sacyr recognises that maximising the dissemination of financial, non-financial, and corporate information, ensuring equal access to information, transparency, and truthfulness is a strategic objective to guarantee and safeguard the rights of shareholders and other stakeholders.

This *Policy* is intended to provide a framework for the standards and guidelines for disseminating financial, non-financial, and corporate information concerning Sacyr and the other companies in its Group (the "**Group**") in accordance with the legislation in force in the countries where Sacyr does business and for good corporate governance practice under its corporate governance system.

### 2. General Principles

To achieve the objectives of this *Policy*, Sacyr and the other companies in its Group will act in accordance with the following general principles:

- a) Disseminating the financial, non-financial, and corporate information in the market and among shareholders, institutional investors, and other stakeholders will be guided by the principles of transparency, truthfulness, immediacy, and equality using appropriate channels in compliance with the data protection legislation and Sacyr's Code of Ethics and Conduct.
- b) High-quality financial information is to be published for the market and for investors and other stakeholders. That information must give a true and fair view of all significant aspects of the equity, economic and financial situation, results, and cash flows of all the companies included in the consolidation.

- c) The non-financial and corporate information disseminated must clearly and reliably explain the Company's activities in the social, environmental, and corporate governance spheres and reflect its dedication to informing all its stakeholders about its contribution to the Sustainable Development Goals (SDGs) in accordance with the commitments Sacyr and the companies in its Group have assumed under the *Sustainability Policy Framework*.

### **3. Communications channels**

Financial, non-financial, and corporate information is disseminated via the following channels to help maximise the reach and quality of the information that is available to the market, to investors, and to other stakeholders, without prejudice to using other channels according to the available technology, media, and new communications trends:

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

The National Securities Market Commission (CNMV) is the first information channel for shareholders, institutional investors, and markets used by the Company. In accordance with the law, the Commission promptly releases the information reported to it. Reports containing information on the Company submitted to the CNMV are posted on the Company's website immediately.

#### **3.2. Sacyr's website and mobile applications**

The Company has a corporate website ([www.sacyr.com](http://www.sacyr.com)), the Company's main official channel for communicating with shareholders, institutional investors, and markets in general. All the information required by the law as it stands at any given time is posted there.

In particular, the Company's website contains a section specifically for its shareholders and investors which offers extensive institutional, financial, non-financial, corporate, and corporate governance information about the Company.

To enhance the ability of the Company's website to serve as a channel for transmitting information to shareholders, institutional investors, and markets in general, the Company's website should be kept up to date as far as possible, and its information is to be published in both Spanish and English.

Relevant facts are to be posted to the Company's website at the same time as the Company reports them to the CNMV.

In addition, Sacyr publishes and updates all the economic and financial information and all the non-financial and corporate information relevant to the market for its main divisions and companies on the corporate website ([www.sacyr.com](http://www.sacyr.com)) and on the corporate mobile applications (sacyrlife; sacyrcontigo) and oversees the quality,

transparency, and factualness of that information. The recipients of the information can access all current information, publications, and sporadic information at once and later.

### **3.3. Investor Relations**

The Company has a dedicated Investor Relations Section under the Finance Department whose objectives include serving as a permanent and transparent open communications channel with shareholders, institutional investors, and other stakeholders. There is a toll-free telephone number, +34900101930, plus there are two email addresses ([accionistas@sacyr.com](mailto:accionistas@sacyr.com) and [ir@sacyr.com](mailto:ir@sacyr.com)) to field their questions and suggestions.

To strengthen relations with these stakeholders, meetings on the progress of the Company and its Group may be organised with Company management to inform shareholders residing in the most relevant financial centres in Spain and other countries, in all cases in keeping with the principle of equal treatment for all shareholders in the same class and respecting the norms concerning inside information in the Final Provision.

### **3.4. Ad hoc communications meetings**

The Company regularly organises, both on its own and on request, meetings, telephone conference calls, video conferences, mailings, and roadshows with institutional investors, analysts, financial institutions, asset managers, financial intermediaries, and other social agents like the media, opinion leaders, government bodies, third sector representatives, etc. for instance to explain non-financial and corporate information in a space for exchanging views with the participants and for providing personalised responses to their comments and questions.

### **3.5. General Meeting**

Because of the legal form of the Company and its Group, Sacyr holds an Ordinary General Meeting annually. It is an excellent forum for the Company to exchange information with the shareholders representing the Company's share capital and the other stakeholders by publishing and circulating all the Group's economic and financial information and the Integrated Sustainability Report, including the Non-Financial Information Statements.

The Board must foster informed participation by shareholders at General Meetings and must take all appropriate measures to ensure that General Meetings can effectively perform their work under applicable law and the Articles of Association.

Before the General Meeting the Company will make available to the shareholders whatever additional communications channels may be appropriate, such as the electronic shareholders forum or any others that may be set up, together with all information required by law or, though not required, may be of interest and can reasonably be supplied.

It must respond expeditiously to requests for information from shareholders before General Meetings and respond diligently to the questions raised by shareholders at Meetings.

Corporate Headquarters, assisted by the Investor Relations Department, will be responsible for maintaining a dialogue with proxy advisers, replying to their questions concerning proposed resolutions submitted to the General Meeting, and furnishing whatever explanations are considered appropriate.

### **3.6. Information over social media**

In line with CNMV guidelines, social media are also envisaged as a supplementary channel for communicating financial, non-financial, and corporate information in addition to the CNMV. The following requirements must be followed for information considered to be inside information:

- i. The information disclosed must be clear, objective, and complete. No additional sources besides the original message should be needed to be able to understand it fully.
- ii. The message must be clearly marked "inside information" and must be separate from promotional or marketing announcements.
- iii. The Company's name must be clearly stated.
- iv. The disclosure must be made over one of the main social media platforms from accounts with many followers.
- v. The information must be precise and formally announced and must be understandable without adding any further information or extra details.

### **3.7. Other External Communications Channels**

The Company has opened communications channels for responding to requests for specific non-financial information and has set up email accounts for that purpose, e.g.:

- Investor and shareholder relations [ir@sacyr.com](mailto:ir@sacyr.com) or [accionistas@sacyr.com](mailto:accionistas@sacyr.com)
- Office of Communications [comunicacion@sacyr.com](mailto:comunicacion@sacyr.com)
- Sustainability [sostenibilidad@sacyr.com](mailto:sostenibilidad@sacyr.com)

- General information [info@sacyr.com](mailto:info@sacyr.com)
- ALM [sacyr.prevencionbc@sacyr.com](mailto:sacyr.prevencionbc@sacyr.com)
- Data Protection [protecciondedatos@sacyr.com](mailto:protecciondedatos@sacyr.com) or [dpo@sacyr.com](mailto:dpo@sacyr.com)
- Ethical Channel, through the accesses to this channel of communication available at [www.sacyr.com](http://www.sacyr.com).

### 3.8. Internal Communications Channels

Sacyr has set up internal communications channels with its employees, a stakeholder group that needs special attention and information. The same standards of equality, truthfulness, and transparency apply to the internal channels used, the Mysacyr intranet, newsletters, mailings.

## 4. Final Provision

The Company will bear in mind the rules for processing inside information laid down both by law and in the Company's corporate governance guidelines in the Board Regulations, the Internal Code of Conduct (ICC) for Sacyr and its Group of companies in securities markets, and the Code of Ethics and Conduct.

*This Financial, Non-Financial and Corporate, and Shareholder, Institutional Investor, and Proxy Adviser Communications Policy was approved by Sacyr's Board of Directors on 22 December 2022 and was last modified on May 8, 2023.*