

INNOVATION POLICY

The Board of Directors of Sacyr, S.A. (“**Sacyr**”), in the exercise of its general and non-delegable power to determine the company’s overall policies and strategies, and following review and proposal by the relevant Committee, has approved this *Innovation Policy* (hereinafter, the “**Policy**”)

The purpose of this *Policy* is to provide the framework for defining and establishing the principles and criteria that govern actions related to innovation, in alignment with its vision and strategy.

1. Purpose

At Sacyr, we define innovation as new ideas that, when applied to the business, generate value for our clients, shareholders, employees, and the society in general.

Our commitment to innovation is one of the strategic pillars that guarantees our company’s competitiveness in the short, medium, and long term. Similarly, the development of innovative solutions in our activities is essential for improving our operations, processes, services, and business model in changing market conditions.

In the sectors in which we compete, where scientific and technological advances represent a differential value, Senior Management understands that implementing initiatives that promote a culture of innovation, the development of creativity, and relationships with other innovative agents in our environment is an essential priority for achieving the company’s objective. Likewise, carrying out innovation projects that have an impact and add value to the business and having a common management system for the entire Group are also fundamental factors in achieving our strategy.

The innovation strategy is based on:

- Strategic innovation focused on identifying and resolving challenges and opportunities in our different business lines.
- The involvement and commitment of Senior Management in achieving the innovation objectives set by the company.
- The exploration and anticipation of future challenges and opportunities, including the evaluation of potential long-term scenarios and a focus on areas of opportunity that are priorities for the organization.
- The pursuit of initiatives and projects that generate impact and ensure the scaling of successful pilots.

- The acceptance of mistakes as part of the learning process.
- A progressive increase in the level of disruption in innovation, with proportionality between incremental, transformational, and disruptive innovation.
- The implementation of mechanisms for the agile and effective development of innovation throughout the organization, ensuring the cross-cutting nature and synergies of initiatives with an impact on different business units.
- Foster the creation of an innovative ecosystem based on exploring new avenues of collaboration, with the aim of obtaining knowledge and jointly developing solutions that address our challenges by delivering sustainable value, while assessing how society and our stakeholders affect us and how we affect them.
- Promote internal talent by implementing a culture of innovation that creates a context of change within the organization and permeates all levels of the company.
- A solid process for enhancing the value of innovation through project certifications that provide external recognition of our system.
- All of the above supported by an R&D&I management system compliant with the UNE-EN ISO 56001:2024 standard, whose objective is to define the requirements for an innovation management system that an organization can use to develop and demonstrate its innovation capability, improve its innovation performance, and create value for customers and other stakeholders.

2. Scope of application

This Policy applies to all entities within the Sacyr Group, considering their specific characteristics. For the purposes of this document, the Sacyr Group comprises: (i) all subsidiaries or majority-owned entities over which Sacyr exercises direct or indirect effective control, regardless of geographical location; and (ii) Fundación Sacyr. Therefore, any reference in this Policy to the Sacyr Group includes all such entities and the Foundation.

Subsidiaries or companies in which Sacyr holds a minority interest and does not exercise effective control, either directly or indirectly, are not included within the scope of this *Policy*. These entities may have their own policies or internal regulations governing these matters, provided they are consistent with this *Policy*.

3. General principles

To ensure the implementation of the objectives set forth in this Policy, Sacyr and the other companies belonging to its Group will guide their actions by the following general principles:

- a) Implement an innovation management process and its governing bodies (the Management Committee and the Innovation Operations Committee) to serve as a tool for defining strategic priorities, investment, and technological and market alliances, as well as for ensuring compliance with and the implementation of the *Innovation Policy* throughout the company.
- b) Periodically review the strategic priorities and identify the Group's main business challenges.
- c) Provide the financial and human resources necessary for the effective implementation of our innovation strategy.
- d) Provide safe operating frameworks for innovation by establishing the appropriate tools for developing pilot projects and for rapidly validating hypotheses, minimizing risk and ensuring the generation of value and the sharing of learning throughout the process.
- e) Strengthen a strategic intelligence and monitoring system that drives the identification of opportunities and challenges for Sacyr and the detection of innovation needs in processes or services.
- f) Encourage innovation ecosystems and promote innovation in collaboration with startups, entrepreneurs, and suppliers with the aim of developing new disruptive and sustainable business models while fostering knowledge exchange.
- g) Develop solutions with a high impact on sustainability and aligned with our Strategic Plan that provide significant advantages in terms of the efficiency of our processes, the identification of new revenue streams, or the exploration of new business models.
- h) Foster an innovative culture throughout the entire organization that creates motivating work environments to encourage and recognize the generation of ideas and innovative practices by employees.
- i) Identify the knowledge existing within Sacyr and among its employees in order to foster its development as a tool for creating value.
- j) Share the knowledge generated internally so that everyone is aware of the best practices applicable to their activity in the pursuit of efficiency and effectiveness across all processes.
- k) Integrate innovation into all training content through specific initiatives and programs aimed at developing capabilities.
- l) Protect the results of the innovation process by managing intellectual and industrial property appropriately and ethically.

- m) Promote collaborations with the academic, intellectual, and technological communities by forming partnerships that enable us to multiply our innovative capacity.

This *Innovation Policy* was approved by the Board of Directors of Sacyr on October 1, 2020, and modified on February 26, 2026.