

BUSINESS CONTINUITY POLICY

The Board of Directors of Sacyr S.A. ("**Sacyr**" or "**the Group**"), within the scope of its general and non-delegable authority to determine the general policies and strategies of the Sacyr Group, and following review and proposal by the competent Committee, has approved this Business Continuity Policy (hereinafter, the "**Policy**").

1. Purpose

This *Policy* establishes the corporate framework for Business Continuity Management (hereinafter, "**BCM**") within the Sacyr Group, ensuring the resilience of business processes and the technological systems that support them.

Its purpose is to ensure that the organization possesses the necessary mechanisms, structures, and responsibilities to effectively prevent, identify, respond to, and recover from disruptive events that may affect the continuity of critical processes and, consequently, the achievement of the Group's strategic objectives.

The *Policy* thus constitutes the governing document that defines and regulates the consistent application of BCM within Sacyr. It serves as a binding reference for the development and maintenance of specific procedures, methodologies, and plans across various organizational areas, ensuring that continuity is managed uniformly, measurably, and with an orientation towards resilience and continuous improvement.

2. Scope of application

This *Policy* applies to all entities belonging to the Sacyr Group, considering their specific characteristics. For the purposes of this document, the Sacyr Group is understood to comprise (i) all subsidiaries or majority-owned companies over which Sacyr, S.A. exercises effective control, directly or indirectly, regardless of their geographical location, and (ii) the Sacyr Foundation. Therefore, all references in this *Policy* to the Sacyr Group shall be understood to include all the aforementioned companies and the Foundation.

Not included in its scope of application are subsidiaries or minority-owned companies over which Sacyr, S.A. does not exercise effective control, either directly or indirectly. These entities shall, where applicable, have their own policies or internal regulations governing the matter, which may in no case contradict the provisions of this *Policy*.

3. General principles of Business Continuity

Through this *Policy*, Sacyr and the other Group companies adopt and promote the following general principles that shall guide all their activities:

- a. Assume responsibility for driving, supporting, and overseeing the implementation of Business Continuity Management (BCM) within their respective areas of competence, ensuring its integration into corporate culture, decision-making, and strategic planning.
- b. Develop BCM in a coordinated manner across the Group, promoting cooperation, information exchange, and consistency of strategies and plans, in order to ensure a coherent and effective response to incidents.
- c. Promote awareness and continuous training for personnel with direct and indirect responsibilities in BCM, ensuring they possess the necessary knowledge, skills, and resources to perform their duties effectively.
- d. Tailor continuity strategies in accordance with the criticality of processes and the identified risk level, applying proportionality criteria that optimize resource utilization and ensure an effective response to potential disruptions.
- e. Subject BCM to a continuous process of review, evaluation, and improvement, incorporating lessons learned from tests, simulations, and real incidents, as well as recommendations derived from audits or internal reviews, formally documenting the results and using them to define action plans and continuously strengthen the Group's organizational resilience.
- f. Develop BCM in coherence with applicable regulations and with other corporate policies and management systems of the Group.
- g. Communicate this *Policy* to all Sacyr Group personnel and make it available to relevant stakeholders, reviewing it periodically and whenever significant changes occur in the Group's structure, processes, or operational context.

This Business Continuity Policy was approved by the Board of Directors of Sacyr S.A. on February 26, 2026.