

C0. Introduction

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C0.1

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**(C0.1) Give a general description and introduction to your organization.**

Sacyr is a global group listed in the Spanish stock market committed to meeting any challenge to transform society. We have been active for over 30 years and we are global leaders in the infrastructure sector, operating in over 20 countries, primarily in Latin America and southern Europe, as well as in strategic markets like the United States and Australia. Approximately 82,5% of our backlog and 67% of our revenues are originated outside of Spain, figures that are growing thanks to our international expansion.

The company is structured in three different areas of activity:

- Engineering and infrastructure: focusing mainly on the construction of all manner of civil works and residential and non-residential building infrastructure as well as the promotion, performance, start-up and operation of engineering and industrial construction projects.
- Concessions: managing infrastructures such as motorways, hospitals, transport hubs, etc.
- Services: specializing in the management of the environment, water, and multiservice.

Sustainability is one of the main cornerstones of Sacyr Group's activities and the company has made big advances to contribute towards its development in those societies where it operates. In this sense, Sacyr's corporate vision is to be a leading Group with an international focus that is seen as a benchmark in developing innovative, high-value projects, that grows steadily and profitably, providing quality employment opportunities for its employees while being environmentally friendly.

Within its commitment to sustainability and the fight against climate change, Sacyr started reporting to CDP in 2018 and by the end of 2020 developed a Climate Change Strategy, committed to achieve net-zero by 2050, and has set approved Science Based Targets.

In addition to this Strategic Plan, we have also launched the sustainability action plan, the "2021- 2025 Sacyr Sustainable Action Plan", with which we have introduced new indicators related to environmental, social and governance (ESG) issues to, among other things, promote diversity, fight climate change, double investment in social action and innovation in the next five years and improve the health and safety of our employees. As a result of this new approach, and the major results of our previous Strategic Plan for the 2015-2020 period, we have been awarded as the most sustainable company in the infrastructure and construction sector in Spain, according to the assessment carried out by the Sustainalytics ESG Risk Rating, which evaluates the sustainability performance of more than 20,000 companies worldwide, taking into account both the environmental, social and corporate governance aspects of these corporations.

C0.2

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**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	No	<Not Applicable>

C0.3

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**(C0.3) Select the countries/areas in which you operate.**

- Algeria
- Australia
- Brazil
- Canada
- Chile
- Colombia
- Gibraltar
- Ireland
- Mexico
- Oman
- Paraguay
- Peru
- Portugal
- Qatar
- Spain
- United Kingdom of Great Britain and Northern Ireland
- United States of America
- Uruguay

C0.4

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(C0.4) Select the currency used for all financial information disclosed throughout your response.

EUR

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Operational control

C-CN0.7/C-RE0.7

(C-CN0.7/C-RE0.7) Which real estate and/or construction activities does your organization engage in?

New construction or major renovation of buildings

Other real estate or construction activities, please specify (Renewable energy construction, Transportation and other Civil infrastructure)

C0.8

(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	ES0182870214

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Chief Executive Officer (CEO)	Sacyr's Chief Executive Officer, who now is as well the President of the company, is the maximum responsible of climate-related issues. The CEO heads the Sustainability Committee, which gathers monthly and aside from overseeing the development of activities and strategies, he provides approval for the following: -Strategic plans and long-term policies. -Quality, Environmental and Energy Management Programs that contain the objectives and ensure the availability of the necessary resources for its fulfillment. -Necessary actions and resources to achieve the objectives set in the Climate Change strategy, developed in three phases: I. Diagnostic study. II. Identification and assessment of climate risks and opportunities according to the Task Force on Climate-related Financial Disclosure (TCFD). III. Target setting and definition of action lines. As examples of significant decisions taken by our CEO in 2021, it can be mentioned the approval of the ambition chosen on the submission of our validated Science Based Target (published in October 2021). Among other examples would be: the revision and update of Sacyr's Climate Change Policy in the first half of the year and the Climate Change Strategy (November 2020), which ambitious aim is to achieve carbon neutrality by 2050, with other intermediate targets in the short and medium term.

C1.1b

**(C1.1b) Provide further details on the board's oversight of climate-related issues.**

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	<p>Reviewing and guiding strategy</p> <p>Reviewing and guiding major plans of action</p> <p>Monitoring implementation and performance of objectives</p> <p>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</p>	<Not Applicable>	<p>At Sacyr we are aware of our role as a driving force of change in society and we have extended our commitment to sustainability, in line with the Sustainable Development Goals set out in the United Nations Agenda 2030 of the United Nations, placing it as one of the central pillars of the company's vision for the future. With this objective in mind, and so that together we can solve the upcoming sustainability challenges, a Sustainability and Corporate Governance Commission was created in 2020, delegated to the Board of Directors, made up of a majority of independent directors, and a Sustainability Committee that meets monthly, chaired by the company's CEO. In addition, the Head of the Quality, Environment and Energy Director communicates to the COO the Quality, Environment and Energy Department's main operating issues. The COO is part of Sacyr's board, along with the CEO/President and other C-suite officers. The whole board meets on a monthly and quarterly basis and climate-related topics are as well covered in some of them. The enormous impetus generated by this top-level governance at the highest level has resulted in the approval and updating, once again in 2021, of many goals and policies related to ethics and sustainability, shaping the commitments we make to address these challenges.</p>

**C1.1d**

**(C1.1d) Does your organization have at least one board member with competence on climate-related issues?**

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	No, but we plan to address this within the next two years	<Not Applicable>	Important but not an immediate priority	<p>Although currently no board member has a previous background in sustainability, the company has made an effort to train its top management on the subject, offering them a training course with the aim of raising awareness and improving knowledge about the best practices that could make Sacyr a leading company. In fact, its effect has been demonstrated by being chosen as the most sustainable company in the infrastructure and construction sector in Spain according to Sustainalytics ESG Risk Rating. This has only served to motivate Board members even more, who are showing increasing interest; and a true reflection of this is the company's clear strategic direction towards contributing to a decarbonized economy. For this reason, their knowledge in the field will be highly valued when it comes to integrating new members in the coming years.</p>

**C1.2**

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly

**C1.2a**

**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

Sacyr's CEO holds the highest position in the company. At the moment, the responsibilities from being both CEO and President lay on the same person. For this reason, he provides approval for strategic plans and long-term policies; Quality, Environmental and Energy Management Programs that contain the objectives and ensure the availability of the necessary resources for its fulfillment; as well as the necessary resources to achieve the objectives set in the Management Programs. He is particularly involved in overseeing climate related issues through the Sustainability and Corporate Governance Committee, delegated by Sacyr's Board of Directors and the Sustainability Committee, which gathers on a quarterly and monthly basis and its second one is actually led by him. This Committee is responsible for developing and implementing sustainability actions within a strategy aligned with the ODS (Sustainable Development Goals).

The Corporate General Manager, COO, is as well part of the board and the Sustainability Committee and lies directly underneath Sacyr's CEO on the reporting line. He is in charge of overseeing the company's internal and external context; managing and coordinating environmental and climate-related activities, as well as their risks and associated opportunities; supervising the design and implementation of Sacyr's environmental policies; and informing Sacyr's Quality, Environment and Energy Director about environmental or energy requirements contained in the agreements or commitments signed by the company.

The Quality, Environment and Energy Director stems from Corporate General Management, which is led by the COO. The Director is in charge of designing the proposing Action Plans, coordinating their implementation with all involved departments and geographies, as well as preparing the Action Plans' follow-up and establishing the level of compliance with its goals. She is responsible for the following activities:

- Design of the company's environmental policies
- Identification of Sacyr's internal and external context along with the Heads of other Departments
- Identification of stakeholders' needs
- Identification and assessment of risks, as well as threats and opportunities, with the pertinent Heads of Departments
- Design of action plans derived from risks and opportunities assessed as moderate, important or critical
- Execution of the action plans' follow-up
- Development of Management Programs and establishment of the mechanisms to control their compliance, as well as provision of the necessary resources to achieve the objectives
- Compilation and analysis of regulations that may be applicable to Sacyr
- Draft of the annual report on general compliance with legal requirements
- Compliance with legal requirements, environmental obligations and procedure
- Monitoring the Climate Change Strategy and determining the degree of compliance with the related goals.

The Integrated Management System Committee, also named internally Quality, Environment and Energy Committee, is formed by the positions aforementioned and other elected members of the Quality, Environment and Energy Department and conducts the following activities:

- Development of a context and stakeholders' study
- Final consolidation of risks and opportunities
- Approval of actions aimed at reducing risk impact and defining the goal for the residual risk (these actions will become part of the Master Plan, which will be approved by the aforementioned Sustainability Committee).
- Analysis of the System Review Report

### C1.3

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	Climate-related issues are considered a key factor for the future cross-wise sustainability of our operations, that is why, aiming to align our actions to the best practices and fulfilling our reduction objectives, Sacyr is offering monetary and no monetary incentives linked to climate performance, and strategic targets to technicians, managers and directors. In order to receive such incentives, the attainment of the established objectives is mandatory. The monetary incentives consist of a fixed remuneration based on: 1. Position on the Board 2. Characteristics of the directors 3. Involvement or not, as well as degree of responsibility within the different Committees. As an example, the Sustainability Committee provides 23,000 euros for the Chairman/President and 18,000 euros for the rest of vocals.

### C1.3a

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction target	Sustainability objectives are a priority for the group, they are part of the strategic plan to ensure an optimum coherence and, consequently, are objectives of the Chairman and CEO. Indeed, the strategic plan will not be considered satisfactorily fulfilled if the climate objectives are not met. The incentive awarded to him is therefore linked to targets such as emission reduction targets through the following activities: -Design and approval of the Climate Change Strategy, which addresses the challenges and opportunities, both in the area of mitigation (reduction of greenhouse gas emissions, GHG) and adaptation (impacts derived from climate change) in the company. -Approval of the company's climate change risk maps. Aside from the monetary reward allocated, this position also benefits from non-monetary incentives, such as recognition within the organization that helps to improve motivation and environmental performance, through interviews, videos, talks, etc.
Chief Operating Officer (COO)	Monetary reward	Emissions reduction target	The incentive awarded to the COO, who sits on the Sustainability Committee and reports directly to the Chairman and CEO, is linked as well to strategical targets such as emission reduction targets through the following activities: -Relying key topics related to climate change to the Sacyr Management Committee. This is composed of the Chairman, GMs and CEO. -Design and approval of the Climate Change Strategy, which addresses the challenges and opportunities, both in the area of mitigation (reduction of greenhouse gas emissions, GHG) and adaptation (impacts derived from climate change) in the company. -Design and approval the company's climate change risk maps according to the Task Force on Climate-related Financial Disclosure (TCFD) recommendations. Sustainability objectives are established in a way that is totally aligned with the company's Strategic Plan, to ensure an optimum coherence. Aside from the monetary reward allocated, this position also benefits from non-monetary incentives, such as recognition within the organization that helps to improve motivation and environmental performance, through interviews, videos, talks, etc.
Other, please specify (Head of Quality, Environment and Energy)	Monetary reward	Emissions reduction target	The incentive awarded to the Head of Quality, Environment and Energy is linked to strategical targets such as emission reduction targets through the following activities: - Implementation of the strategy and implementation of emission reduction plans for the periods 2021-2025, 2025-2035, 2035 -2050, where emission reductions are quantified by period. -Identifying and assessing risks and opportunities in relation to climate change -Monitoring the resulting plans and coordinate the implementation within all relevant areas. - Crosswise awareness in climate change risks and their management. Sustainability objectives are established in a way that is totally aligned with the company's Strategic Plan, to ensure an optimum coherence. Aside from the monetary reward allocated, this position also benefits from non-monetary incentives, such as recognition within the organization that helps to improve motivation and environmental performance, through interviews, videos, talks, etc.
Other, please specify (Quality, Environment and Energy Management Team)	Monetary reward	Emissions reduction target	The incentive awarded to the Quality, Environment and Energy Management Team is linked to strategical targets such as emission reduction targets through the following activities: -Implementation of the strategy and implementation of emission reduction plans for the periods 2021-2025, 2025-2035, 2035 -2050, where emission reductions are quantified by period. Sustainability objectives are established in a way that is totally aligned with the company's Strategic Plan, to ensure an optimum coherence. Aside from the monetary reward allocated, this position also benefits from non-monetary incentives, such as recognition within the organization that helps to improve motivation and environmental performance, through interviews, videos, talks, etc.

**C2. Risks and opportunities**

**C2.1**

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

**C2.1a**

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	5	The period corresponds with the years from 2020 to 2025, aligned with current Sacyr's Strategic Plan (from its release to its end date), which is why the company considers "short term" the years encompassed in that period.
Medium-term	5	15	The period corresponds with the years 2025 to 2035.
Long-term	15	30	The period corresponds with the years between 2035 and 2050 in order to encompass climate change projections.

**C2.1b**

### (C2.1b) How does your organization define substantive financial or strategic impact on your business?

Sacyr has developed and established a framework to assess, on a scale from low, medium, high and very high and based on probability and impact, the substantive financial and/or strategic impact on the business when identifying or assessing climate-related risks. The system considers aspects such as economic losses, cost overrun, health and safety, legal aspects, reputational issues, and delays on the delivery and their associated impacts, as all of them are considered to potentially affect and compromise the strategy and financial results of the company.

Sacyr can be clearly divided in three\* very different business units (Engineering and infrastructures, Concessions and Services), reason why different thresholds (quantifiable indicator) have been defined for each one of them as neither volume of operations nor impact of the activities can be compared within them three. However, this is particularly relevant if an impact on the business affects our Concessions are (larger-scale projects), since it is where greater revenues come from (49% EBITDA).

We consider a risk has the potential to substantively impact our business in financial terms if it gets over High or Very high levels, which, referring to each of the business units individually means:

- Engineering and infrastructures: High (1.5M€ - 3M€), Very High (>3M€)
- Concessions: High (cost overrun between 5% - 10% of expected costs), Very High (cost overrun of more than 10% of expected costs)
- Services: High (300k€ - 1000k€), Very High (>1000k€)

\*Please note that, with respect to the previous structure, during 2020 the group has undergone a number of changes, including the integration of two turnkey project areas into a single business division: Sacyr Engineering and Infrastructures and Sacyr Industrial, now both under Sacyr Engineering and Infrastructures.

## C2.2

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## (C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

### Value chain stage(s) covered

Direct operations  
Upstream  
Downstream

### Risk management process

Integrated into multi-disciplinary company-wide risk management process

### Frequency of assessment

More than once a year

### Time horizon(s) covered

Short-term  
Medium-term  
Long-term

### Description of process

All the different types of risks are assessed together according to TCFD recommendations through an overall management structure via internal systems such as "My Risks" which allow us to determine whether a risk has the potential to substantively impact our business in financial terms (if it gets High/Very high levels). The relativization of the risks identified, including those related to climate change, is clearly shown in a risk matrix (pg 96 of our annual report), as well as in the successive risk sheets which, all in the same format, respond to a multi-disciplinary integration. In the case of climate risks, the quantifiable input for this relativization comes from a clear relevant procedure (supported by "PG.01.09 Analysis of the context of the organization" and "PG.01.08 Risk analysis methodology" general company-wide procedures) that is in place: The Quality, Environment and Energy Department is responsible for identifying the internal and external context of Sacyr and assessing climate change-related risks and opportunities, along with other relevant heads of relevant departments for each case. The Sustainability Committee is then in charge of review, debate and approve the context and stakeholder analysis and the identification and assessment of climate R&O. This exercise takes place twice a year (February & September) and it studies the effects of climate change on the direct operations of the company along with stakeholders such as clients (downstream), analysts, investors, NGOs, employees, suppliers (upstream), etc. Within this analysis, the risk assessment is carried out on the basis of various physical and transitional climate scenarios. The result of this study is a SWOT matrix from which the identified R&O are analyzed, assessed considering the activity and geographical area and managed according to the internal procedure aforementioned, which takes into account the following aspects: • Internal: business model, resources, management system and processes, legal environment, and unpredictable scenarios. • External: legal/economic environment, supply chain, environmental factors, technological developments, political environment, and unpredictable scenarios. A qualitative assessment is carried out then based on the probability of occurrence of each risk/opp and its impacts on Sacyr's financial accounts to understand which of them could have a substantive impact. It assesses past conditions, implemented measures, impacts on annual accounts (changes in direct or indirect costs, income or investment), performance potential and time horizon (short, medium, long), as well as any other additional observations. Sacyr also performs a quantitative analysis (for physical risks only so far) by using a tool that combines scientific data from the latest Assessment Report (AR6) of the IPCC with natural catastrophe risk layers (e.g. flood zones), using three different IPCC scenarios to calculate the financial impact of Sacyr's asset-level risk: RCP 2.6, 4.5 and 8.5. In line with best practice in climate science, data are averaged over different time periods to account for interannual variability, thus allowing results to be analyzed according to the time horizons defined in our Climate Change Strategy. A priority value is calculated for each one through an assessment of the probability of occurrence and the impact on the company's image, breach of contract, billing and internal costs. Thus, risks/opportunities are prioritized according to the need to act on them as trivial, tolerable, moderate, important or critical. Once climate-related risks and opportunities are identified and assessed, and depending on the result, the Sustainability Committee approves the acceptable level of risk and decides the specific managing method to each one of them. The possible managing methods are: • Acceptance of the risk: assuming it. • Avoidance of risk: eliminating or not continuing with the activity that causes it. • Reduction of the risk: applying measures to reduce its probability of occurrence or its impact. • Transfer or share of the risk: distributing the risk with other parties, e.g. through insurance. Acceptance of risk is the option chosen by default for those risks assessed as trivial, not incurring a substantive financial impact nor affecting the company's strategy. In the case of tolerable or moderate risks, they can be accepted as well by establishing a follow-up on a regular basis in order to control they don't evolve into a greater risk. Important or critical risks, that is, those above the acceptable risk value (those classified as high/very high), require establishing a detailed action plan with the goal of reducing or avoiding said risk. These action plans include actions to be carried out divided into milestones, assigned resources and managers, as well as a planning of their execution. The Quality, Environment and Energy Department defines these action plans and subjects them to the approval of the Committee. These action plans are integrated into the Management System Plan. In some cases, the Committee may decide to assume the risk without establishing an action plan. In order to do so, they must justify their decision. However, it is not the common situation. The final expected risk reduction and the level of risk to be achieved are included on Sacyr's risk map. The current Climate Strategy includes focus areas for which several action plans have already been defined, having a direct impact on carbon management. An example of this is action line 2: Increasing the use of renewable/alternative energies. Nevertheless, identified risks and opportunities, its impact and the management and mitigation associated, can be seen in detail on the section 5.2.2 Climate risks and opportunities of our 2021 annual report, classified by type, business line affected, and time horizon. i) Case study (physical): The increased severity and frequency of cyclones and hurricanes was identified thanks to our scenario analysis assessment with a medium probability (2) and magnitude (2) for a medium-term horizon. The level of risk has been defined as tolerable, with a focus on Mexico/US. They would cause material damage and temporary cessation of production (increased costs). Aware of the situation, the management processes was defining contingency protocols implemented from the very first stages of the operation in order to limit the effect and not incur in a substantive financial impact. ii) Case study (transition): climate-related reporting requirements resulting from an increasing stakeholder interest was identified as a potential risk in the short-term. Once evaluated by the relevant business experts, it was assessed as important and treated as an opportunity as well aiming to show good performance and gain reputation by voluntary complying in advance with recommendations that may become mandatory in the future (measure to reduce its probability of occurrence or its impact).

## C2.2a

**(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?**

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Current regulation is always included in our risk analysis as Sacyr is subject to different regulations since its activity is carried out in different countries, so it is of major importance to have them under control to ensure compliance. For this reason, and considering TCFD recommendations, two transitional scenarios have been analyzed. In this sense, current regulation regarding GHG emissions, infrastructure resilience, water management, and energy consumption among others has been analyzed to identify potential risks on Sacyr's activity. An example of current regulation risk that is being monitored by Sacyr is the reporting requirement of non-financial information according to the Spanish Law 11/2018 of 28 December on non-financial information disclosure which requested new features in environmental reporting. The law demands information on the current and foreseeable effects of the company's activities on the environment and, if applicable, on health and safety, environmental assessment or certification procedures; GHG emissions results and measures adopted to mitigate climate change, the resources dedicated to the prevention of environmental risks, among others. Even though Sacyr had already been covering this kind of reporting for several years now, it demanded an adjustment in procedures and even more exhaustive management of climate change issues.
Emerging regulation	Relevant, always included	Emerging regulation is always included in our risk analysis as Sacyr is subject to different regulation due to the fact that its activity is carried out in different countries, so it is of major importance to make sure our activities are aligned with upcoming legislative criteria in advance to ensure compliance once in force. For this reason, and considering TCFD recommendations, two transitional scenarios have been analyzed. Taking current regulation as a starting point, regulation needed to achieve a low carbon economy (restriction on GHG emissions, sustainable use of natural resources, etc) has been analyzed to identify potential risks on Sacyr's activity. An example of emerging regulation risk that is being monitored by Sacyr is the energy transition promoted by new initiatives such as the Green Deal of the EU, which comes with several regulatory changes and possible regulations aimed at vehicle circulation, such as regulations on diesel and gasoline vehicles, for which we will need to gradually adapt our fleet. Regulations may vary significantly depending on the region and country being analyzed, this is why being able to adapt to such requirements in each country is imperative. These risks are included in the annual climate change risks and opportunities analysis.
Technology	Relevant, always included	Sacyr uses a wide variety of technology due to the broad spectrum of activities that it carries out. For this reason, technology risks such as the cost of low carbon technology or the risk to not being able to adapt to certain technology on time are analyzed. An example of technology risk that is being monitored by Sacyr is the need to substitute our large fleet of heavy construction machinery and those from our subcontractors, as well as products and services for those that emit less GHG emissions. These risks are included in the annual climate change risks and opportunities analysis. For example, in Spain, the facilities are affected by regulations (IPPC - Integrated Pollution Prevention and Control Directive), and mandatory incorporation of the best techniques available in some of the plants we operate, both for ourselves and as a service for our clients. Also on many occasions the purchase of low-emission vehicles for our working fleet is mandatory in some tenders, which commits us to be able to financially switch to new technology.
Legal	Relevant, sometimes included	Sacyr is potentially subject to different legal claims since its activity is carried out in different countries. Legal aspects are sometimes considered in the regulation aspects of the climate related risks assessment. An example of a legal risk that is being monitored by Sacyr is the exposure to litigations related to climate change. These risks are included in the annual climate change risks and opportunities analysis. For example, in mining issues, some works that have almost been launched have been eventually canceled. Concessions show indeed greater awareness of companies about the risk of regulatory non-compliance. For example, in Mexico there was a suspension of activities in an asphalt plant, but no fines have been defined yet. Within this type, there are other risks evaluated such as the stricter emissions reporting obligation that may translate to fines or other repercussions in case that the company doesn't comply.
Market	Relevant, always included	Sacyr carries out its activity globally. For this reason, market related risks in regard to climate-issues such as changes in consumer behavior due to awareness, rise in fossil fuel prices are always considered in our risk and opportunities assessments. An example of a market risk that is being monitored by Sacyr is the potential increase in cost of raw materials due to changes in both supply and demand due to a higher awareness on climate change matters. These risks are included in the annual climate change risks and opportunities analysis. Another example would be, referring to our concessions business line, the existing demand of adaptation of infrastructures (e.g. highways) that incorporate new technologies like charging points to meeting the demand of the increasing number of electric and hybrid vehicles on the road. Fulfilling them appropriately gives us access to new growing markets.
Reputation	Relevant, always included	Sacyr carries out its activity globally in a wide spectrum of activities. For this reason, we analyze climate related reputational risks such as lack of transparency, particularly taking into account the increased concern for the environment among stakeholders. An example of a reputation risk that is being monitored by Sacyr is the general stigmatization of the sector, particularly referring to its construction activities. However, we are convinced of our transformational role and leadership ambition on the climate change fight, and this has been recognized externally as we have recently accomplished another milestone in our sustainability strategy by being recognized by the prestigious Sustainalytics ESG Risk Rating as the leader in sustainability in Spain's infrastructure sector, and fourth at a global level.
Acute physical	Relevant, always included	Sacyr is exposed to climate change in every geographic area where it carries out its activity. For this reason, and taking into account TCFD recommendations, two climate scenarios have been analyzed. In this sense, regionalized climate change projections on extreme weather events such as cyclones, droughts, and heat waves have been identified, assessing their potential impacts. Some examples of acute physical risk that are being monitored by Sacyr are landslides, wildfires, cyclones, and heavy rainfalls. These risks are included in the annual climate change risks and opportunities analysis. For example, in 2021 there have been several landslides registered in Colombia, that were caused due to heavy rainfall. As part of the risk management processes, the company has details of both the contingency measures and the prevention measures implemented. As another example, there have been work delays in Mexico due to these hazards which requires reprogramming of the contracts, although these costs are absorbed by the client. Work programs are carried out with low yields in the rainy seasons based on records of previous years and depending on the type of work and the region, indirect costs are determined according to each project.
Chronic physical	Relevant, always included	Sacyr is exposed to climate change in every geographic area where it carries out its activity. For this reason, and taking into account TCFD recommendations, two climate scenarios have been analyzed. In this sense, regionalized climate change projections for temperature rise, change in precipitation and sea level rise have been identified, and their potential impacts have been assessed. An example of chronic physical risk that is being monitored by Sacyr would be the change in water temperature registered throughout the year. Sacyr has a water desalination plant in Sohar (Oman), and due to the increase in temperature, there has been an increase in algae generation (harmful algal bloom). These risks are included in the annual climate change risks and opportunities analysis. As an example, in Mexico, due to increase of temperatures, personnel have suffered from heat stroke (for now, only isolated cases) who have had to stop working for some hours as per being significantly exposed to severe climate conditions. This may lead, for example, to reschedule works into cooler hours.

**C2.3**

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.3a**

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Risk 1

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Acute physical	Flood (coastal, fluvial, pluvial, groundwater)
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**Primary potential financial impact**

Increased capital expenditures

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Landslides derived from the increased severity of extreme weather events have been identified as a potential physical risk for Sacyr. Huge amount of rainfall incur in a soil saturation that led to unstable ground in steep areas and significantly compromise the normal operation conditions. They are felt globally throughout the company, but more notoriously in Peru and Colombia, where we have operations of our three business areas and are positioned as one of the largest infrastructure private company in the country (1st in Colombia, where indeed, more of these events have already impacted us in the past -several per year-). In particular, based on our risk assessments and scenario analysis (RCP 2.6, 4.5, 8.5) carried out in 2021 we have concluded that landslides affect mainly our business areas of Engineering and Infrastructures and Concessions as they can damage and disrupt our assets and work (bridges, motorways, transport interchanges, etc.). They impact Sacyr mainly by causing delays in construction sites, increasing needs in slope maintenance and generally in road operations. These impacts cause interruptions in roads, affecting vehicle traffic and therefore reducing income. Also, maintenance costs increase due to an increment associated to drainage needs, construction and services.

**Time horizon**

Short-term

**Likelihood**

Likely

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

1500000

**Potential financial impact figure – maximum (currency)**

3750000

**Explanation of financial impact figure**

Based on historical events and previous experiences, we estimate that a delay of between 4 and 6 months (the estimated time it takes to return to normal operating conditions in the event of a severe landslide) could result in a 10 to 25% capital cost overrun on the amount initially planned. Considering an average construction cost for a specific area potentially affected by a landslide (roundabout, road section, tunnel section, etc) of 15M euros, the financial impact that this type of disruption in its construction could entail would be in the range of 1.5M euros to 3.75M euros.  $15,000,000 \times 10\% = 1,500,000$  €  $15,000,000 \times 25\% = 3,750,000$  €

**Cost of response to risk**

10527109

**Description of response and explanation of cost calculation**

With the aim of improving our environmental performance, at Sacyr we carry out a series of environmental initiatives to reduce environmental risks, enhance climate-related opportunities, guarantee compliance with legal environmental requirements, the prevention of pollution, the adoption of energy-saving measures, the improvement of waste management and the increase of environmental training and awareness, among others. Senior management has a deep involvement in the implementation of resulting actions from the Climate Change Strategy that the Group approved in 2020. It entails of a roadmap that establishes a common framework on climate management. These actions demonstrate Sacyr's gradual adaptation and determination in the fight against climate change. Complementary to this new strategy, Sacyr assess and manages climate-related risks and opportunities six-monthly from a qualitative and quantitative perspective following the recommendations of the TCFD. This work includes response definition for each specific risk, including mitigation, adaptation and realization plans and measures. Particularly regarding landslides, and with a special focus in Colombia, where we have lately suffered a few incidents (Pamplona Cúcuta highway, Rumichaca area in the frontier with Ecuador, among others), and Peru, our mitigation actions focus on: - Increase revegetation in the area of slope thanks to environmental management programmes, - and expansion of the content and scope of geological and geotechnical studies in landslide-prone areas. Additionally, we took out insurance policies to cover possible property damage and business interruption, which account for 7.3M€ for roads infrastructures. Expenditure and investment in relation to these initiatives totalled more than 47M€ in 2021 (34M€ in 2020, 26M€ in 2019). This figure is the result of gathering the cost of waste and emissions treatment and restoration (12.303.635,85 €) and the cost of environmental management (21.889.011,63 €), which include ordinary and extraordinary expenditures. Disaggregating this figure by country and business area, particularly for our Colombia and Perú infrastructure and concessions operations, it encompasses 2,674,944€ (Colombia) and 552,165 € Perú). We therefore consider that the cost of response is the sum of both mitigation actions and insurance:  $2,674,944 + 552,165 + 7,300,000 = 10,527,109$  €.

**Comment**

**C2.4**

**(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

**(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.****Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development and/or expansion of low emission goods and services

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

The use of lower emissions sources of energy at a national level have been identified as a potential constructive opportunity for Sacyr. Infrastructures are increasingly framed in the strategic plans of countries against climate change, so it would be an opportunity to develop and invest in ideas that allow us to stand out over competitors. Indeed, the new Spanish Climate Change and Energy Transition law (7/2021) stated that, by 2030, the penetration of renewable energy in final energy consumption should account for at least 42% and that the country has to operate through an electricity system with at least 74% of generation from renewable energy sources. On this basis it's expected that renewable energy new infrastructures mean a potential source of projects and therefore revenues. This entails a great opportunity for Sacyr particularly regarding solar plants (up to +80-90% increase in revenue for this particular service), in which we have great experience, taking into account that the amount of photovoltaic power yet to be installed by 2030 to achieve the target is significantly big for a 10 years period. As an example of this opportunity, that will be further materialized in the medium-term but from which we are already noticing some positive impacts, we have built, recently concluded, a photovoltaic plant in Badajoz, Spain for which we will as well be in charge of its operation and maintenance for two years, extendable for a further three. It is estimated to provide electricity to 140,000 households, or 350,000 people. The plant has a capacity of 263.73 MW, with 5,714 solar trackers and 648,000 solar panels on 563 hectares of installation, spread over five large areas, and is connected to the grid via a new electrical substation that is also part of the project. Its renewable energy generation will avoid the emission of a total of 211,564 tCO<sub>2</sub> per year.

**Time horizon**

Medium-term

**Likelihood**

Very likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – minimum (currency)**

186130907

**Potential financial impact figure – maximum (currency)**

279196361

**Explanation of financial impact figure**

According to the ambitious National Integrated Energy and Climate Plan (PNIEC) presented by the government in February 2019, the goal for Spain is to reach 30,000 megawatts of installed photovoltaic power by 2030. According to latest figures at a national scale (REE, march 2021), the installed solar power in Spain is about 12,026MW. This means that in the next 10 years it will have to be increased by 17,974 MWp. During 2021 Sacyr completed the construction of a solar photovoltaic plants in Badajoz (Spain), with an installed power of 263,75 MWp. The green revenues of the year associated with solar energy amounted to 27,312,800 €, so we can estimate that, in our operations in Spain, if we consider a share of the upcoming new operations between 10% and 15%, this will lead to a potential impact figure of: - Ratio revenues per MWp = 27,312,800 € / 263,75 MWp = 103,555.64€/MWp - Conservative scenario of revenues for Sacyr = 103,555.64€/MWp\*(17,974 MWp\*10%) = 186,130,907€ - More aggressive scenario of revenues for Sacyr = 103,555.64€/MWp\*(17,974 MWp\*15%) = 279,196,361€. Therefore, potential revenues of this opportunity can range from over 186 M€ to over 279M€, depending on Sacyr's share of solar construction in the following 10 years.

**Cost to realize opportunity**

61344.26

**Strategy to realize opportunity and explanation of cost calculation**

From our beginnings, innovation always played a leading role in our business strategy. A strategy that evolved over the years from a focus on R&D, largely based on unique projects and "hallmarks", to more disruptive innovation – attractive added values that can help us making sure we succeed on tenders for the new work expected at national level by the Government plans. We expect to realize this opportunity in the short-medium term. Activities related to research, development and innovation are carried out in all business areas of the group. Regarding in particular innovation in solar energy operations and activities, we are boosting the use of solar energy to replace diesel combustion engines in diesel combustion engines in auxiliary installations on our construction sites. As an example of innovation, we developed in 2019 the Aurora Project, an autonomous solar energy generation mobile unit which led to a reduction in the use of gasoil in the generation of electricity for our park. Great progress has been achieved as well in some of our desalination plants (EMMASA, Tenerife) in reducing the ratio of energy consumed per cubic metre of water from 9 kWh/m<sup>3</sup> in the old distillation plants to the current levels of around 3 kWh/m<sup>3</sup> by increasing our solar energy production from 21,000 m<sup>3</sup>/day to 28,800 m<sup>3</sup>/day. Sacyr invested in R&D development a total of 10.5M€ during 2021. Considering our total revenues in 2021 were 4,675M€, and those coming from solar energy totaled 27,312,800 €, this leads to an estimated cost of realizing this opportunity of: 27.3128€/4,675M€\*10.5M€=61,344.26€

**Comment**

C3.1

**(C3.1) Does your organization's strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

Yes, we have a transition plan which aligns with a 1.5°C world

**Publicly available transition plan**

Yes

**Mechanism by which feedback is collected from shareholders on your transition plan**

We do not have a feedback mechanism in place, but we plan to introduce one within the next two years

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

**Attach any relevant documents which detail your transition plan (optional)**

- Sacyr Sustainability Report 1-5.pdf
- Sacyr Sustainability Report 5-5.pdf
- Sacyr Sustainability Report 2-5.pdf
- Sacyr Sustainability Report 4-5.pdf
- Sacyr Sustainability Report 3-5.pdf

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

<Not Applicable>

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

C3.2

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	Yes, qualitative and quantitative	<Not Applicable>	<Not Applicable>

C3.2a

**(C3.2a) Provide details of your organization's use of climate-related scenario analysis.**

Climate-related scenario		Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Transition scenarios	IEA SDS	Company-wide	<Not Applicable>	This is the fourth year that a climate change risks analysis has been carried out at Sacyr considering the Task Force on Climate Financial Disclosure recommendations for our direct operations (considering our three business units, therefore company-wide). For this reason, and in accordance with climate scenario analysis recommendations, different scenarios were chosen. Note that the time horizon was chosen to encompass relevant changes in climate projections as well as the lifespan of the company's infrastructures. The study analyzed aside of physical risks, the following transitional scenario: The Sustainable development scenario developed by IEA. Assumptions were established in accordance with the scenarios and current and emerging regulations. In coherence with this scenario, in Spain, according to the released Law on Climate Change, a strong disbursement of € 200,000M is foreseen in the next 10 years, with the participation of companies from the industry, energy and construction sectors. As actions to be highlighted related to our activity (mainly in its construction BU), it is emphasized that the rehabilitation of at least 100,000 homes/ year will be encouraged to promote energy efficiency and before 2050 the Government will promote the rehabilitation of public and private buildings. Also, the Law on Sustainable Economy mentions renewable energies and energy efficiency as subject to the "promotion of productive sectors linked to science and innovation and greater capacity for internationalization" related to environmental protection, all of them areas in which Sacyr carries out its activity. Indeed, a high percentage of Sacyr's activity is eligible under the EU Taxonomy as stated on question 3.5a, proving a substantial contribution to climate change mitigation, aligned with limiting the increase in temperature to 1.5°C. Transparency, environmental taxation, electric or hybrid vehicles are other factors subject to have an impact on Sacyr.
Physical climate scenarios	RCP 4.5	Business division	<Not Applicable>	This scenario was chosen in accordance with climate scenario analysis recommendations by the TCFD. The study covered Sacyr Concessions' project exposure, including current natural catastrophe modelling results and the future impact of physical climate risk assessed using a comprehensive tool. Output from the sixth phase of the Coupled Model Intercomparison Project (CMIP6), which sets the foundation for the IPCC AR6 report, forms the foundation of named Climate Risk Scores. To account for inter-model variability, model output of several GCMs has been used in our assessment in an ensemble approach. Six were considered (ACCESS-CM2, CMCC-CM2-SR5, GFDL-ESM4, HadGEM3-GC31-LL, MPI-ESM1-2-LR, NorESM2-LM). The Climate Risk Score is defined by scores reflecting chronic changes in average and extreme precipitation score, sea level rise score and changes in average and extreme temperatures as well as changes in precipitation score. These scores can be used to reflect qualitatively acute physical climate risk. Investments made on each projects help us so far in quantifying the loss of profit in case the risk materialized. Time horizon was chosen to encompass relevant changes in climate projections as well as the lifespan of the company's infrastructures. Risks in each scenario are assessed for different time horizons (2030, 2050, 2085), depending on the durability of the concession. We chose to focus on Concessions, being the projects with the longest contractual duration because the anthropogenic contribution to climate change usually manifests itself after 1-2 decades, after which it can be differentiated from natural climate variability therefore useful for evaluating our performance in them. The rest of our project usually last for significantly less time so a long-term analysis would not lead to such applicable output. The scenario RCP 4.5 shows a scenario in which important mitigation actions are carried out and, therefore, a peak of atmospheric emissions is reached around the year 2040 that begin to decrease afterwards. However, despite achieving a considerable reduction in emissions, the global warming projected by the end of the century exceeds the limit of 2°C established in the Paris Agreement. RCP 4.5 was chosen to portray a low emissions scenario using official climate projections of all the main countries were Sacyr operates for the medium-term time horizon.
Physical climate scenarios	RCP 8.5	Business division	<Not Applicable>	This scenario was chosen in accordance with climate scenario analysis recommendations by the TCFD. The study covered Sacyr Concessions' project exposure, including current natural catastrophe modelling results and the future impact of physical climate risk assessed using a comprehensive tool. Output from the sixth phase of the Coupled Model Intercomparison Project (CMIP6), which sets the foundation for the IPCC AR6 report, forms the foundation of named Climate Risk Scores. To account for inter-model variability, model output of several GCMs has been used in our assessment in an ensemble approach. Six were considered (ACCESS-CM2, CMCC-CM2-SR5, GFDL-ESM4, HadGEM3-GC31-LL, MPI-ESM1-2-LR, NorESM2-LM). The Climate Risk Score is defined by scores reflecting chronic changes in average and extreme precipitation score, sea level rise score and changes in average and extreme temperatures as well as changes in precipitation score. These scores can be used to reflect qualitatively acute physical climate risk. Investments made on each projects help us so far in quantifying the loss of profit in case the risk materialized. Time horizon was chosen to encompass relevant changes in climate projections as well as the lifespan of the company's infrastructures. Risks in each scenario are assessed for different time horizons (2030, 2050, 2085), depending on the durability of the concession. We chose to focus on Concessions, being the projects with the longest contractual duration because the anthropogenic contribution to climate change usually manifests itself after 1-2 decades, after which it can be differentiated from natural climate variability therefore useful for evaluating our performance in them. The rest of our project usually last for significantly less time so a long-term analysis would not lead to such applicable output. The scenario RCP 8.5 shows a Business-as-Usual scenario, in which GHG emissions would continue to increase in the order of 4-5°C by 2100. It is the worst possible and it was chosen to portray a high emissions scenario using official climate projections of all the main countries were Sacyr operates for the medium-term time horizon.
Physical climate scenarios	RCP 2.6	Business division	<Not Applicable>	This scenario was chosen in accordance with climate scenario analysis recommendations by the TCFD. The study covered Sacyr Concessions' project exposure, including current natural catastrophe modelling results and the future impact of physical climate risk assessed using a comprehensive tool. Output from the sixth phase of the Coupled Model Intercomparison Project (CMIP6), which sets the foundation for the IPCC AR6 report, forms the foundation of named Climate Risk Scores. To account for inter-model variability, model output of several GCMs has been used in our assessment in an ensemble approach. Six were considered (ACCESS-CM2, CMCC-CM2-SR5, GFDL-ESM4, HadGEM3-GC31-LL, MPI-ESM1-2-LR, NorESM2-LM). The CRS is defined by scores reflecting chronic changes in average and extreme precipitation score, sea level rise score and changes in average and extreme temperatures as well as changes in precipitation score. These scores can be used to reflect qualitatively acute physical climate risk. Investments made on each projects help us so far in quantifying the loss of profit in case the risk materialized. Note that the time horizon was chosen to encompass relevant changes in climate projections as well as the lifespan of the company's infrastructures. Risks in each scenario are assessed for different time horizons (2030, 2050, 2085), depending on the durability of the concession. We chose to focus on Concessions, being the projects with the longest contractual duration because the anthropogenic contribution to climate change usually manifests itself after 1-2 decades, after which it can be differentiated from natural climate variability therefore useful for evaluating our performance in them. The rest of our project usually last for significantly less time so a long-term analysis would not lead to such applicable output. RCP 2.6 describes the best-case scenario, with stringent mitigation efforts to halve Greenhouse Gas (GHG) emissions by 2050 in order to keep global warming below 2°C. Only RCP 2.6 is in line with the 2015 Paris agreement.

**C3.2b**

**(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.**

**Row 1**

**Focal questions**

The exploration and anticipation of future challenges and opportunities, including the assessment of potential long-term impacts and a focus on the organization's areas of opportunity is the reason behind the climate-related analysis that Sacyr has conducted, which will be further developed in the coming years. Future risks were assessed using a comprehensive tool, including current natural catastrophe modelling results and the future impact of physical climate risk assessed using a comprehensive tool. Output from the sixth phase of the Coupled Model Intercomparison Project (CMIP6), which sets the foundation for the IPCC AR6 report, forms the foundation of named Climate Risk Scores. To account for inter-model variability, model output of several GCMs has been used in our assessment in an ensemble approach. Six were considered (ACCESS-CM2, CMCC-CM2-SR5, GFDL-ESM4, HadGEM3-GC31-LL, MPI-ESM1-2-LR, NorESM2-LM). The Climate Risk Score is defined by scores reflecting chronic changes in average and extreme precipitation, sea level rise and changes in average and extreme temperatures as well as changes in precipitation. These scores can be used to reflect acute physical climate risk. Based on the Climate Risk Score, the aim was to understand the risk exposure of Sacyr's projects with the longest contractual duration, that are concessions. This is because, in the climate models used, the anthropogenic contribution to climate change usually manifests itself after 1-2 decades, after which it can be differentiated from natural climate variability. Therefore, the focus of the future risk assessment is based on the year 2050, where there is a clear differentiation between natural variability and the impact of human activity, being then able to respond to the main focal questions: • "Which of our areas of operation (of our long-term projects) will be significantly affected by climate change in the future?" • "How much investment is under risk?" The identified climate hazards were therefore assessed based on both temporal and spatial distribution patterns, highlighting the 10 most exposed projects for each risk according to CRS scores along with their investment value. Three different IPCC scenarios are used to calculate them: RCP 2.6, 4.5 and 8.5. The analysis performed is consistent with TCFD disclosure standards, as the methodologies employed are fully transparent and well documented.

**Results of the climate-related scenario analysis with respect to the focal questions**

Main results - investment: • Europe & South America account for more than 96% (€17.2 billion) of Sacyr's total value of projects. Investments in Chile & Italy stand out. Locations with a project value >500M€ represent almost 88% of all projects. • In the medium scenario (RCP 4.5), 60% of the portfolio moves from low to medium extreme temperature score values in 2050. • For the precipitation score, 3.3% of the portfolio moves from low to medium/high score, while for sea level rise it's 2%. • Drought has been identified as a key current risk profile, followed by flooding caused by torrential rains. • Across the portfolio as a whole, extreme temperature scores are increasing more significantly than precipitation & sea level rise scores are the lowest. • The sea level rise scores show the lowest increase based on a static portfolio, as most projects are located far from the coast. • The climate risk score indicates the most significant risk in the extreme temperature score compared to the precipitation & sea level rise score for the projects as a whole. However, given the nature of the concessions (i.e. physical projects rather than activities related to e.g. power generation or agriculture), this increase in temperature exposure is less of a concern compared to changes in precipitation patterns & sea level rise. Main results - areas: • The extreme temperature score shows climate hotspots in South America (Chile, Colombia & Peru) and Southern Europe (Italy, Spain & Portugal). For the numbered project locations the risk of heat waves & water scarcity is clearly expected to increase. • The precipitation score indicates a large clustering of project values associated with higher future exposure to modelled rainfall in Western/Central Europe (especially Ireland) & South America, mainly in Brazil & Colombia (where we had already suffered impacts). In summary, based on the current risk view & the results of the climate risk score, floods, especially in South America together with increased droughts there and in Europe, represent the greatest current & future risks for Sacyr Concessions. Nevertheless, in 2030 most projects have a score close to zero. In 2050 and later in 2085, there is a clear shift in the portfolio towards higher values, which is more pronounced for the more aggressive RCP scenarios. The conclusions from the study are considered as a performance indicator of Sacyr's Climate Change Strategy and in other corporate decisions (acquisitions and divestments). Based on these results, some action lines have been improved, namely under "Reducing climate vulnerability": -6.1 Awareness and definition of the protocol for the elaboration of climate scenarios in the risk analysis of each new project (including economic estimation of impact before and after mitigation). -6.2 Definition of the protocol for the detection and management of critical infrastructure. -6.3 Study of the vulnerability of our infrastructure to climate change effects.

**C3.3**

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**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	Sacyr is committed to reducing the climate risks that its products and services may generate, as well as strengthening opportunities in order to provide resilient product and services to future market and climate conditions and therefore secure the continuity of the business in the medium and long term. This is why the use of recycled material has taken such relevance in Sacyr strategy. The incorporation of recycled materials according to demand, competitive pricing and customer requirements is listed as a current opportunity in the annual report. Sacyr has indeed recently created a new business division called Sacyr Green whose objective is the development of emerging and innovative businesses around sustainability with topics that revolve around circular economy and energy efficiency, entailing an attractive service line for new and existing customers. One of the most significant decisions made in this regard was driven part of our sale focus to the use of old tires in road construction. This type of recovery in construction allows the use of a large amount of waste, providing a solution for the current problem that entails the management of the huge number of tires generated in Spain yearly. It also reduces the use of natural resources needed for the construction of roads and landfills. The magnitude of impact could be quantified as the revenues that these products and services represent for the company. As part of Sacyr's commitment, it is imperative to have a strategic vision based on asset diversification in terms of both asset location and type. This should come alongside the development of new products and services through innovation. (Horizon: medium and long term)
Supply chain and/or value chain	Yes	Sacyr has also taken into consideration value chain risks and opportunities for the implementation of their strategy. Climate risks, such as extreme weather events, may affect Sacyr's supply chain due to delays in the provision of materials. For example, landslides are increasingly already occurring due to heavy or persistent rain, especially in Colombia or Peru. In these occasions, Sacyr has experienced delays in the completion of projects. In order to mitigate the risk of delays, Sacyr has identified the opportunity of using more efficient production and distribution processes, and reducing costs associated with such processes. Another opportunity identified is the use of new and more efficient technology throughout the value chain, this can represent a reduction of resource consumption, that would also reduce associated costs. The magnitude of impact could be quantified as the losses due to delays in projects' timetables. Taking into account this is a problem we may face again in the short term, our most substantial decision made in this regard was developing stronger eventuality plans for constructions in those areas and always secure back-up suppliers. (Horizon: medium-term)
Investment in R&D	Yes	Sacyr carries out R&D initiatives considering the new realities of climate change, in order to come up with solutions to reduce risks and strengthen opportunities in the short, medium and long term. Probably the most substantial decision made in this regard was the launch in 2018 of the company-wide initiative Sacyr Circular through which employees were able to submit ideas to promote the efficient use of natural resources, as well as the use of materials' flows, energy and waste to generate more profitable and sustainable businesses. In 2019, we carried out the search for solutions to implement the winning project of the 2018 edition of the campaign, and in March 2020 we created a circular projects catalogue. The company is indeed currently integrating the new lines of the Spanish Circular Economy Strategy to continue transforming its development and growth model into an innovative, competitive and sustainable model. As part of the opportunities identified, investment in water purification processes have been deployed to decrease both water use and consumption. Sacyr has implemented a system to harness and reuse water for different uses such as those in their own facilities, or irrigation. Given the increase in demand for desalinated water, the use of innovative purification and desalination technologies have been gaining importance in recent years. Sacyr has a big commitment to open innovation, and this is translated to two major initiatives: Sacyr Ingenium, this is a collective intelligence platform for employees, and Sacyr iChallenges, this is aimed at solving the business challenges posed by the company (open innovation). In July 2020, for example, we presented the challenge "Measure and report the carbon footprint" to develop a tool to automate calculations for Scope 3 carbon emissions. The number of employees involved in innovation projects is 283 and the number of projects under consideration is 245, reaching an investment in R&D greater than 10.5 million euros, which means that 9.5% of our net profit is reinvested in innovation. (Horizon: short, medium and long term)
Operations	Yes	Sacyr is exposed to a wide variety of climate-related risks and opportunities inherent to the different activities that the company carries out throughout its business areas, as well as the diverse geographical areas where it operates. During operations, the company experiences impact derived from climate-related risks such as delays and needs for reconstruction due to extreme weather event. By this means, we aim to decarbonize our operations, mitigate risks not only for ourselves but third parties and contribute globally to the climate change fight. However, climate issues also pose opportunities for new operations and contracts in the medium term, in fact, the most substantial strategic decision recently taken relates to an upcoming renewable energies business unit that is starting its operations. Sacyr has identified yet another opportunity by implementing the replacement of vehicles that consume energy from fossil fuels with vehicles that run on renewable energy. The magnitude of the impact could be quantified as the cost of implementing mitigation and adaptation measures in operations, and the revenues obtained from new operations derived from climate-related opportunities. (Horizon: medium term)

**C3.4**

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Direct costs Capital expenditures Capital allocation Acquisitions and investments Assets	For Sacyr, climate change not only entails risks, but offers as well major opportunities for the growth, development and competitiveness of its business. Each of the risks and opportunities identified is classified not only by type of risk/opportunity according to TCFD recommendations and the area of the company affected, but also by the type of financial impact: direct costs, indirect costs, revenues or expenditure/investment, which helps us drive action towards its mitigation or realization. The company has set out the Planet Ambition with the aim of responding to the most urgent environmental challenges, following the path already set since the company's beginnings and as a key factor within the current business strategy. Indeed, the strategic plan will not be considered satisfactorily fulfilled if the climate objectives are not met, therefore climate-related risks and opportunities have influenced our short-medium term financial planning. i) Revenues (Horizon: short-term) The increasing need for low carbon products and services, as well as efficient and sustainable infrastructures allow us to access to new contracts and an increase in revenues. The magnitude of the impact could be quantified as the revenues obtained from low carbon products and services offered as a response to climate related issues. In 2021, our commitment was also made evident following the creation of a new division called Sacyr Green, as a commitment to emerging, innovative and sustainable businesses with a focus on the circular economy and energy efficiency. As an example, a major contract was awarded in 2021 in Chile: "Buin-Paine" hospital construction (P3) in Maipo (200 beds and 9 pabillions), which it couldn't have been awarded to Sacyr if we hadn't been able to guarantee a sustainable building method, critical on their requirements. ii) Assets, acquisitions and investments, capital expenditures, capital allocation (Horizon: medium-term) Moreover, Sacyr analyses climate-related risks and opportunities in the study of new acquisitions and investments, influencing capital allocations and capital expenditures. Indeed, physical climate risks have a clear potential impact on Sacyr's type of assets, so climate-related issues are always considered both for existing and potential new infrastructures. In accordance with the above, Sacyr has set a growth strategy based on projects related to the integral water cycle, circular economy and renewable energy generation, for which we have created Sacyr Renewable Concessions business line, boosting investments in, for example a desalination plant that has its own renewable energy supply (Perth, Australia). A company-wide Integrated Risk Management System (IRMS) is implemented in big projects -considering its size and its financial amount-, and it defines the identification and assessment of risks of different nature related to these projects. This evaluation process includes the following elements of analysis: category and description of the risk, classification into threat or opportunity, responsible actor for its evaluation, evaluation result (probability, impact and level of priority), economic estimation of the impact both before and after mitigation, as well as planning (including financial planning) of the actions associated with its mitigation. iii) Direct costs (Horizon: short-term) Regarding direct costs, climate change consequences such as increase in temperatures or extreme weather events, as well as emerging regulation such as severing energy consumption, influence Sacyr's operating costs due to delays and repairs of damages caused. However, the company has insurance policies that cover some climate events. In 2021, Sacyr indeed renewed its international Corporate Environmental Civil Liability insurance program to cover all Group subsidiaries. This environmental civil liability insurance program sufficiently complies with the qualitative and quantitative requirements set out in the laws applicable in each country, and the compensation limit for the Insurance Program is €40 million per loss event, and €75 million per policy term.

**C3.5**

**(C3.5) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's transition to a 1.5°C world?**

Yes

**(C3.5a) Quantify the percentage share of your spending/revenue that is aligned with your organization's transition to a 1.5°C world.****Financial Metric**

CAPEX

**Percentage share of selected financial metric aligned with a 1.5°C world in the reporting year (%)**

84.7

**Percentage share of selected financial metric planned to align with a 1.5°C world in 2025 (%)**

90

**Percentage share of selected financial metric planned to align with a 1.5°C world in 2030 (%)**

95

**Describe the methodology used to identify spending/revenue that is aligned with a 1.5°C world**

Aware that the current economic model is in the process of transition towards a decarbonized economy, at Sacyr we face the global challenges posed by the current environment as an active part of the solution. In view of the entry into force of the reporting requirements arising from the EU Taxonomy, we sought to anticipate this and, at the end of the 2021 financial year, undertook in-depth work to identify and quantify the proportion of our economic activities that can be categorized as sustainable, in terms of eligibility, under its requirements. According to this new classification of economic activities, a substantial contribution to climate change mitigation means levels of performance that are aligned with limiting the increase in temperature to 1.5°C. We see the EU Taxonomy as a tool that allows us to continue advancing in the transformation of our business model, in line with our commitment to sustainability as embodied in our 2021-2025 Strategic Plan and the Sacyr Sustainable Action Plan. Through our strategic priorities, their implementation allows us to redirect capital flows towards more sustainable businesses, identifying new investment opportunities. Likewise, the existence of a common classification provides us with greater transparency in internal management and communication, measuring the sustainability of our business in relation to the substantial contribution of our activities to sustainable development and the generation of value, both for society and for the rest of our stakeholders. 1. Identification and analysis of the Group's activities. Companies have been identified whether, on the basis of their corporate purpose, they could fit into the activities potentially eligible for Taxonomy. Due to the structure of the Sacyr Group, those companies that carry out different types of activities have been analyzed down to the minimum level of management, where appropriate, contract or project in order to individually assess the activity itself and therefore its eligibility. 2. Accounting metrics. In accordance with Delegated Regulation (EU) 2021/2178 on disclosure of Taxonomy information, the accounting criteria to be taken into account when calculating the numerator and denominator of eligible and ineligible INCN and CapEX: • INCN, has been calculated as the share of net turnover derived from products or services, including intangibles, associated with economic activities that comply with the taxonomy (numerator), divided by net turnover (denominator). • CapEX, covers additions to tangible and intangible assets during the relevant financial year before depreciation, amortization and any revaluations for the relevant financial year, excluding changes in fair value. One of the Group's main activities is related to the transportation sector, representing more than half of Sacyr's eligible activity. In addition, through companies such as Sacyr Facilities, we also undertake projects for the renovation, maintenance and repair of facilities with the aim of making them more efficient (insulation, energy efficiency, photovoltaic panels, recharging points, etc). Lastly, the portfolio of potentially eligible activities is completed with healthcare and social services, mainly provided by Sacyr Social, activities related to the generation of renewable energy (biomass plants, solar parks, photovoltaic parks, etc) and the construction and maintenance of electrical substations (Sacyr Concesiones Renovables) and, to a lesser extent, the development of IT. The analysis shows that 76.7% of the Sacyr Group's INCN and 84.7% of its CapEX are eligible. These figures ratify the great potential of Sacyr's business model, which is present in key sectors for the world economy and can contribute significantly to the reduction of GHG emissions. The concreteness of this contribution will be analyzed through the degree of alignment of eligible activity in future years, for which the Sacyr Group is already working on it.

**Financial Metric**

Other, please specify (INCN)

**Percentage share of selected financial metric aligned with a 1.5°C world in the reporting year (%)**

76.7

**Percentage share of selected financial metric planned to align with a 1.5°C world in 2025 (%)**

90

**Percentage share of selected financial metric planned to align with a 1.5°C world in 2030 (%)**

95

**Describe the methodology used to identify spending/revenue that is aligned with a 1.5°C world**

Aware that the current economic model is in the process of transition towards a decarbonized economy, at Sacyr we face the global challenges posed by the current environment as an active part of the solution. In view of the entry into force of the reporting requirements arising from the EU Taxonomy, we sought to anticipate this and, at the end of the 2021 financial year, undertook in-depth work to identify and quantify the proportion of our economic activities that can be categorized as sustainable, in terms of eligibility, under its requirements. According to this new classification of economic activities, a substantial contribution to climate change mitigation means levels of performance that are aligned with limiting the increase in temperature to 1.5°C. We see the EU Taxonomy as a tool that allows us to continue advancing in the transformation of our business model, in line with our commitment to sustainability as embodied in our 2021-2025 Strategic Plan and the Sacyr Sustainable Action Plan. Through our strategic priorities, their implementation allows us to redirect capital flows towards more sustainable businesses, identifying new investment opportunities. Likewise, the existence of a common classification provides us with greater transparency in internal management and communication, measuring the sustainability of our business in relation to the substantial contribution of our activities to sustainable development and the generation of value, both for society and for the rest of our stakeholders. 1. Identification and analysis of the Group's activities. Companies have been identified whether, on the basis of their corporate purpose, they could fit into the activities potentially eligible for Taxonomy. Due to the structure of the Sacyr Group, those companies that carry out different types of activities have been analyzed down to the minimum level of management, where appropriate, contract or project in order to individually assess the activity itself and therefore its eligibility. 2. Accounting metrics. In accordance with Delegated Regulation (EU) 2021/2178 on disclosure of Taxonomy information, the accounting criteria to be taken into account when calculating the numerator and denominator of eligible and ineligible INCN and CapEX: • INCN, has been calculated as the share of net turnover derived from products or services, including intangibles, associated with economic activities that comply with the taxonomy (numerator), divided by net turnover (denominator). • CapEX, covers additions to tangible and intangible assets during the relevant financial year before depreciation, amortization and any revaluations for the relevant financial year, excluding changes in fair value. One of the Group's main activities is related to the transportation sector, representing more than half of Sacyr's eligible activity. In addition, through companies such as Sacyr Facilities, we also undertake projects for the renovation, maintenance and repair of facilities with the aim of making them more efficient (insulation, energy efficiency, photovoltaic panels, recharging points, etc). Lastly, the portfolio of potentially eligible activities is completed with healthcare and social services, mainly provided by Sacyr Social, activities related to the generation of renewable energy (biomass plants, solar parks, photovoltaic parks, etc) and the construction and maintenance of electrical substations (Sacyr Concesiones Renovables) and, to a lesser extent, the development of IT. The analysis shows that 76.7% of the Sacyr Group's INCN and 84.7% of its CapEX are eligible. These figures ratify the great potential of Sacyr's business model, which is present in key sectors for the world economy and can contribute significantly to the reduction of GHG emissions. The concreteness of this contribution will be analyzed through the degree of alignment of eligible activity in future years, for which the Sacyr Group is already working on it.

## C4. Targets and performance

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### C4.1

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(C4.1) Did you have an emissions target that was active in the reporting year?

Absolute target

#### C4.1a

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(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.

**Target reference number**

Abs 1

**Year target was set**

2021

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

<Not Applicable>

**Base year**

2020

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

119657.23

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

290433.97

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

<Not Applicable>

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

410091.2

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

100

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

100

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

<Not Applicable>

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2030

**Targeted reduction from base year (%)**

42

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

237852.896

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

119083.68

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

274570.05

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

<Not Applicable>

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

393653.73

**% of target achieved relative to base year [auto-calculated]**

9.54344627081327

**Target status in reporting year**

Underway

**Is this a science-based target?**

Yes, and this target has been approved by the Science Based Targets initiative

**Target ambition**

1.5°C aligned

**Please explain target coverage and identify any exclusions**

Sacyr joined the Business Ambition for 1.5°C in 2019, whereby it undertook to define and validate company-wide science-based targets. The defined targets, modeled our target using SBTi absolute contraction method and criteria (with no exclusions nor relevant biogenic emissions), were officially approved in October 2021. Average based year Through this initiative we aim to be aligned with the objective of the United Nations to limit to 1.5°C the increase of global temperature at age-old levels pre-industrial. These science-based targets are aimed at reducing the carbon footprint corresponding to the different operations developed by the Group, as part of our roadmap towards net zero emissions. Among the many benefits that they entail are: • to deepen carbon management; • boosting innovation; • anticipating legal requirements; • strengthening investor confidence; improving profitability and competitive positioning

**Plan for achieving target, and progress made to the end of the reporting year**

To accomplish these objectives, we will follow the roadmap defined in the Climate Change Strategy based on its different courses of action, while taking into account the climate-related risks and opportunities identified in the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We began to implement various initiatives, all of which are framed within the lines of action envisioned in the Climate Change Strategy and coordinated by various working groups comprising specialists that represent the different companies that make up Sacyr: • Continue boosting energy efficiency (which has contribute greatly to emission reduction in the recent years). • Increase the use of renewable energies. • Increase knowledge of the embedded emissions in acquired product and services. • Reduce emissions of the value chain. • Implement actions to boost the circular economy. • Spread the deployment of the internal carbon price. • Raise awareness of climate change and our procedures all over the company.

**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

**Target reference number**

Abs 2

**Year target was set**

2021

**Target coverage**

Company-wide

**Scope(s)**

Scope 3

**Scope 2 accounting method**

<Not Applicable>

**Scope 3 category(ies)**

Category 1: Purchased goods and services

Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

Category 5: Waste generated in operations

Category 15: Investments

**Base year**

2020

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

<Not Applicable>

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

<Not Applicable>

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

3290391.4

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3290391.4

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

<Not Applicable>

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

<Not Applicable>

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

89

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

89

**Target year**

2030

**Targeted reduction from base year (%)**

25

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

2467793.55

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

<Not Applicable>

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

<Not Applicable>

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

2705734.37

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

2705734.37

**% of target achieved relative to base year [auto-calculated]**

71.0744660954316

**Target status in reporting year**

Underway

**Is this a science-based target?**

Yes, and this target has been approved by the Science Based Targets initiative

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

Sacyr joined the Business Ambition for 1.5°C in 2019, whereby it undertook to define and validate company-wide science-based targets. The defined targets, modeled our target using SBTi absolute contraction method and criteria (with no exclusions nor relevant biogenic emissions), were officially approved in October 2021. Average based year Through this initiative we aim to be aligned with the objective of the United Nations to limit to 1.5°C the increase of global temperature at age-old levels pre-industrial. These science-based targets are aimed at reducing the carbon footprint corresponding to the different operations developed by the Group, as part of our roadmap towards net zero emissions. Among the many benefits that they entail are: • to deepen carbon management; • boosting innovation; • anticipating legal requirements; • strengthening investor confidence; improving profitability and competitive positioning.

**Plan for achieving target, and progress made to the end of the reporting year**

To accomplish these objectives, we will follow the roadmap defined in the Climate Change Strategy based on its different courses of action, while taking into account the climate-related risks and opportunities identified in the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We began to implement various initiatives, all of which are framed within the lines of action envisioned in the Climate Change Strategy and coordinated by various working groups comprising specialists that represent the different companies that make up Sacyr: • Continue boosting energy efficiency (which has contribute greatly to emission reduction in the recent years). • Increase the use of renewable energies. • Increase knowledge of the embedded emissions in acquired product and services. • Reduce emissions of the value chain. • Implement actions to boost the circular economy. • Spread the deployment of the internal carbon price. • Raise awareness of climate change and our procedures all over the company.

**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

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**C4.2**

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**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

Target(s) to increase low-carbon energy consumption or production

Net-zero target(s)

Other climate-related target(s)

**C4.2a**

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**(C4.2a) Provide details of your target(s) to increase low-carbon energy consumption or production.**

**Target reference number**

Low 1

**Year target was set**

2021

**Target coverage**

Country/region

**Target type: energy carrier**

Electricity

**Target type: activity**

Consumption

**Target type: energy source**

Renewable energy source(s) only

**Base year**

2020

**Consumption or production of selected energy carrier in base year (MWh)**

458613.25

**% share of low-carbon or renewable energy in base year**

11

**Target year**

2024

**% share of low-carbon or renewable energy in target year**

100

**% share of low-carbon or renewable energy in reporting year**

53

**% of target achieved relative to base year [auto-calculated]**

47.191011235955

**Target status in reporting year**

New

**Is this target part of an emissions target?**

Yes, our commitment to the use of renewable energy in Spain and other geographies to come is aimed at reducing emissions from electricity consumption, which accounts for a high percentage of our carbon footprint, thereby by committing to purchase Guarantees of Origin, we are contributing to the achievement of our Scope 1 and 2 Science Based Target by 2030.

**Is this target part of an overarching initiative?**

Science Based Targets initiative

**Please explain target coverage and identify any exclusions**

Sacyr is firmly committed to renewable energy and has taken a further step forward by committing to supply electricity from renewable sources with a guarantee of origin certificate for projects located in Spain for the 2021 financial year onwards. The guarantee of origin is an electronic certificate issued by the National Commission of Markets and Competition (CNMC) that guarantees that the energy that is consumed comes from renewable generation sources.

**Plan for achieving target, and progress made to the end of the reporting year**

We continue to promote the supply of renewable energy in all the countries in which we operate, which has allowed us to greatly increase our consumption of renewable energy in the recent years. Our main initiative here is the contract for the supply of electricity from renewable sources with a guarantee of origin certificate for projects located in Spain. As stated on module 11, the introduction of an internal carbon price (shadow price) is helping us on the decision making towards determining this renewable supply. The most effective action, in terms of emissions reductions in this reporting year, has been to switch to renewable energy supply a number of water treatment plants which significantly increased our scope 2, as well as on Sacyr Circular activities, some sites under a Concession agreement.

**List the actions which contributed most to achieving this target**

<Not Applicable>

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**C4.2b**

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**(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.**

**Target reference number**

Oth 1

**Year target was set**

2021

**Target coverage**

Company-wide

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Engagement with suppliers	Other, please specify (Suppliers assessed on ESG aspects)
---------------------------	---

**Target denominator (intensity targets only)**

Other, please specify (Total number of suppliers)

**Base year**

2021

**Figure or percentage in base year**

54.37

**Target year**

2025

**Figure or percentage in target year**

76.12

**Figure or percentage in reporting year**

54.37

**% of target achieved relative to base year [auto-calculated]**

0

**Target status in reporting year**

New

**Is this target part of an emissions target?**

Yes, great performance against this target contributes to Scope 3 emissions reductions, therefore, to our global value chain Science Based Target (Abs 2).

**Is this target part of an overarching initiative?**

Science Based targets initiative - other

**Please explain target coverage and identify any exclusions**

Sacyr considers it to be a priority to prevent any risks arising from its supply chain and in the goods and services produced or provided by the companies forming part of this chain. On 17 December 2020, Sacyr's Board of Directors approved the Supply Chain Management Policy, which defines and establishes Sacyr's sustainability principles and commitments and those of its suppliers in the area of sustainability, from an environmental, social, regulatory, ethical and health and safety perspective, throughout the whole life cycle of its projects. In 2021, to reinforce this commitment, among other measures, we carried out an ESG risk analysis of our our most significant supplier portfolio, taking into account chronological and business volume contracting criteria, and set a target aiming to increase the coverage of that ESG analysis (+40% by 2025).

**Plan for achieving target, and progress made to the end of the reporting year**

In 2021, the environmental and social impact of 2,804 suppliers considered with high sustainability risk was evaluated, and 42 of them had a significantly negative environmental impact. As a result, 47.62% of these have agreed to make improvements to their environmental-social behaviour and the remainder (52.38%) have put an end to their commercial relationship as a result of the assessment. Moreover, in 2021, Sacyr audited 30 suppliers on-site, with quality, social and environmental management criteria. The influence resulting from the above actions, led to, along the past months, an increased on the number of suppliers that meet environmental and social criteria by 17%.

**List the actions which contributed most to achieving this target**

<Not Applicable>

**C4.2c**

**(C4.2c) Provide details of your net-zero target(s).**

**Target reference number**

NZ1

**Target coverage**

Company-wide

**Absolute/intensity emission target(s) linked to this net-zero target**

Abs1

Abs2

Abs3

**Target year for achieving net zero**

2050

**Is this a science-based target?**

No, but we are reporting another target that is science-based

**Please explain target coverage and identify any exclusions**

Reducing GHG emissions is one of the pillars of our company-wide 2021-2025 Strategic Plan. We are determined to play an active role in the fight against climate change, and thus, in 2020 we launched our Strategy against climate change, a roadmap that symbolizes our commitment to shifting towards a decarbonized economy before 2050. A proof of our commitment is our adhesion to the United Nations' "Business Ambition for 1.5 °C" and "Race To Zero" global campaigns for the climate, setting the highest possible level of ambition to reduce our emissions, aiming to contribute to halve global emissions by 2030 and achieve zero net carbon emissions by 2050. One of our action lines to face this challenge has been establishing emission-reducing goals based on the 'Science Based Targets Initiative' (SBTi) criteria, having already validated our near-term goals in 2021, and expecting to commit to validate our long-term Net-Zero target in the coming months.

**Do you intend to neutralize any unabated emissions with permanent carbon removals at the target year?**

Yes

**Planned milestones and/or near-term investments for neutralization at target year**

Although Sacyr's aim is to reduce at least 90% through our emissions by 2050, some residual emissions may remain at the target year. Our company therefore intends to neutralize these unabated emissions through permanent removal and storage of carbon from the atmosphere. Our commitment is such that during the United Nations Conference on Climate Change (COP26), we indeed presented the Best Practice Guidance for achieving net zero emissions in collaboration with the Spanish Green Growth Group (GECV); and now that we have defined our ambition and target year, our next step is to define intermediate milestones combining different types of projects covering increasing percentages of our total footprint defining therefore a full year-on-year strategy that will eventually meet the net zero criteria set by the SBTi in the target year. We aim this to be a pathway and not a single final action.

**Planned actions to mitigate emissions beyond your value chain (optional)**

In addition to any neutralization actions between the reporting year and our net-zero target year, Sacyr firmly believes in the transformative power of beyond value chain mitigation projects to accelerate the transition. For years, the company has been allocating budget to contribute through offset projects in some of the countries where we are present, so this is a practice already established in the company that will only increase in a complementary way to the investment in specifically eligible neutralization projects and the continuous reduction of emissions (deep decarbonization).

**C4.3**

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

**C4.3a**

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	0	0
To be implemented*	0	0
Implementation commenced*	0	0
Implemented*	11	687.87
Not to be implemented	0	0

**C4.3b**

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

**Initiative category & Initiative type**

Energy efficiency in buildings	Heating, Ventilation and Air Conditioning (HVAC)
--------------------------------	--

**Estimated annual CO2e savings (metric tonnes CO2e)**

7.85

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

10463

**Investment required (unit currency – as specified in C0.4)**

1434

**Payback period**

<1 year

**Estimated lifetime of the initiative**

11-15 years

**Comment**

This initiative consists on improvements within the office building such as machinery replacement and some lighting improvements.

**Initiative category & Initiative type**

Energy efficiency in production processes	Cooling technology
---	--------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

0.07

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

97

**Investment required (unit currency – as specified in C0.4)**

50

**Payback period**

<1 year

**Estimated lifetime of the initiative**

6-10 years

**Comment**

This consists on the adjustment of the set point temperature of six radiators.

**Initiative category & Initiative type**

Energy efficiency in buildings	Lighting
--------------------------------	----------

**Estimated annual CO2e savings (metric tonnes CO2e)**

66.89

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

35973

**Investment required (unit currency – as specified in C0.4)**

317438

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

This initiative consists on the replacement of traditional lighting with LED lighting.

**Initiative category & Initiative type**

Low-carbon energy generation	Solar PV
------------------------------	----------

**Estimated annual CO2e savings (metric tonnes CO2e)**

125.22

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

125217

**Investment required (unit currency – as specified in C0.4)**

111643

**Payback period**

<1 year

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This initiative consists on two main topics, the first is the installation of a solar photovoltaic plant and then also the modulation of air turbines through the installation of oxygen sensors.

**Initiative category & Initiative type**

Low-carbon energy generation	Solar PV
------------------------------	----------

**Estimated annual CO2e savings (metric tonnes CO2e)**

324.83

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

168436

**Investment required (unit currency – as specified in C0.4)**

82822

**Payback period**

<1 year

**Estimated lifetime of the initiative**

21-30 years

**Comment**

This consists of a project for the installation of solar panels to feed a lighting tower. This is an initiative that consists on substituting the vehicles and machinery for electric ones. This includes 4 vehicles, van and lawing machine.

**Initiative category & Initiative type**

Transportation	Company fleet vehicle replacement
----------------	-----------------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

35.78

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

17802

**Investment required (unit currency – as specified in C0.4)**

252078

**Payback period**

11-15 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

This is an initiative that consists on substituting the vehicles and machinery for electric ones. This includes 4 vehicles, van and lawing machine.

**Initiative category & Initiative type**

Transportation	Company fleet vehicle efficiency
----------------	----------------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

50.85

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

25301

**Investment required (unit currency – as specified in C0.4)**

523511

**Payback period**

16-20 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

This consist on the renewal of vehicles that are more efficient.

**Initiative category & Initiative type**

Waste reduction and material circularity	Other, please specify (Installation of a boiler powered by landfill biogas. )
--	---

**Estimated annual CO2e savings (metric tonnes CO2e)**

24.1

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 5: Waste generated in operations

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

11990

**Investment required (unit currency – as specified in C0.4)**

44890

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This initiative consists on the Installation of a boiler powered by landfill biogas to evaporate gases and reduce the carbon footprint associated with its treatment by an external manager

**Initiative category & Initiative type**

Transportation	Company fleet vehicle efficiency
----------------	----------------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

0.88

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

436

**Investment required (unit currency – as specified in C0.4)**

8338

**Payback period**

16-20 years

**Estimated lifetime of the initiative**

11-15 years

**Comment**

Initiative that consists on the renewal of a van, and three buses for vehicles and buses that have much more efficient technology.

**Initiative category & Initiative type**

Transportation	Company fleet vehicle efficiency
----------------	----------------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

1.96

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

976

**Investment required (unit currency – as specified in C0.4)**

2720

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This initiative consists on renewing two vans and a vehicle that have more efficient technology.

**Initiative category & Initiative type**

Energy efficiency in production processes	Machine/equipment replacement
---	-------------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

49.44

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

Scope 3 category 1: Purchased goods & services

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

22843

**Investment required (unit currency – as specified in C0.4)**

257342

**Payback period**

11-15 years

**Estimated lifetime of the initiative**

11-15 years

**Comment**

This initiative consists on renewing the loaders for more efficient ones.

**C4.3c**

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Dedicated budget for energy efficiency	One of the core pillars of Sacyr's new Climate Strategy is to promote energy savings and to adopt energy efficiency measures, both in our activities and in the projects we develop for our clients. In this sense, during 2021, the following energy efficiency related initiatives have been carried out, among others: energy management systems for public lighting, facilities and hospitals; replacement of diesel combustion engines by solar energy; replacement of classic light sources with LED lighting; renewal of the fleet for more efficient vehicles in service contracts. In 2021, Sacyr has quantified energy savings of 10,059.59 GJ (3,244.90 GJ in 2020), thus avoiding the emission into the atmosphere of 691.27 tCO <sub>2</sub> e (233.47 tCO <sub>2</sub> e in 2020).
Dedicated budget for low-carbon product R&D	Sacyr has developed several low-carbon products and services through R&D initiatives. Some examples are the use of LED lights in tunnels, and the fabrication of RARx (an additive for bituminous mixtures manufactured from used tires' powder). The budget dedicated to R&D in 2021 rounded 10.5M€ (8M€ in 2020).
Partnering with governments on technology development	Sacyr and Honeywell have formed a joint venture to set up the world's first plastics treatment plant using UpCycle technology, to be located in Andalusia (Spain). It will make us the first company in the world to implement these processes along the entire value chain of plastic waste management. UpCycle technology expands the number of types of plastics that can be recycled, including tinted, flexible or laminated packaging, rich in polyolefins or polystyrene, that would otherwise end up in landfill. This allows for a 57% reduction in CO <sub>2</sub> equivalent emissions compared to producing the same amount of virgin plastics from fossil sources, and a 77% reduction compared to traditional methods of plastic waste management, such as incineration or landfill. This helps to reduce the demand for virgin plastic, with the aim of promoting a circular plastic economy. Another worthmentioning example of collaboration between Sacyr and a third company towards innovation is Life Hyeward, a Project lead by Sacyr Water which arises with the goal of making desalination processes more sustainable by combining reverse osmosis and reverse electrodialysis (RED). The project has the collaboration of partners from the consortium of the Dutch sister companies REDstack and Pure Water Group. The project is financed by the European project LIFE, started on November 1, 2021 and has a duration of three and a half years. It will eventually allow to recover up to 20% of the energy used in the reverse osmosis process, generating clean and renewable energy from brine, reducing the CO <sub>2</sub> emissions of the desalination process.
Compliance with regulatory requirements/standards	Sacyr fulfills regulatory requirements such as GHG emissions requirements on public tenders, as well as voluntary standards like ISO 50.001, ISO 14.001 or MITECO's "Climate Projects" that aim to reduce GHG emissions on diffuse sectors in Spain.
Employee engagement	Sacyr carries out several campaigns to engage its employees in sustainable practices and emission reduction activities. Through Sacyr Ingenium we want to capture new ideas, new proposals to promote and enhance the effect of the collective intelligence of the people collective intelligence of the people who form part of Sacyr. This programme, whose name reflects our values of creativity, talent, rigor and innovation, seeks new ideas on how to achieve ideas on how to achieve, within the company, more profitable and sustainable businesses by using the profitable and sustainable businesses within the company through the use of new technologies and new ways of doing things, and thus generate a positive impact on all our activities in order to impact on all our activities with the ultimate aim of improving the quality of life of citizens.
Internal price on carbon	Sacyr has recently started implementing tow types of internal carbon price to drive decarbonization: • The shadow price, whose purpose is to anticipate future risks, thus helping to improve forecasting when studying the viability of a project. It also helps us anticipate the regulation of greenhouse gases. It is considered when selecting projects, managing risks, proposing offers, etc, as an extra cost. • The Implicit Price, calculated based on the objective costs of reducing emissions of our company, such as the purchase of renewable energies or the improvement of energy efficiency.

**C4.5**

**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?**

Yes

**C4.5a**

**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.**

**Level of aggregation**

Group of products or services

**Taxonomy used to classify product(s) or service(s) as low-carbon**

The EU Taxonomy for environmentally sustainable economic activities

**Type of product(s) or service(s)**

Lighting	Conventional LED
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**Description of product(s) or service(s)**

Sacyr offers third parties to reduce their emissions through its business unit Concessions, where it offers sustainable management options for roads, buildings etc. In this sense, in 2021 we have continue developing a project where sodium vapor lights were replaced by LED lights (IOHNIC system) in tunnels. These products allow third parties to avoid GHG emissions in their Scope 2, due to the fact that LED lights consume less electricity. The SACYR IOHNIC luminaire has passed all the evaluation processes that demonstrate its compliance with the CE marking of European Conformity, the RETILAP Regulation in Colombia and SEC approval in Chile. This marks the start of the commercialization of its innovative IOHNIC lighting system. Environmental criteria have been incorporated into its design, reducing its environmental different phases of its life cycle. Another significant achievement is a lower consumption of energy resources due to the high efficiency and brightness control. As an example, emissions for a tunnel type (bidirectional, 2km) would result in a reduction of 153tCO<sub>2</sub>/year (or 60%) compared to other conventional solutions. Please note that, even though Sacyr drives efforts towards this kind of products (60,449 lights supplied in 2021), due to the high volume of turnover as a global, the revenue obtained from them is diluted and represents <1% for the moment.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

Yes

**Methodology used to calculate avoided emissions**

Estimating and Reporting the Comparative Emissions Impacts of Products (WRI)

**Life cycle stage(s) covered for the low-carbon product(s) or services(s)**

Use stage

**Functional unit used**

kWh consumed on a year per tunnel km

**Reference product/service or baseline scenario used**

High pressure sodium vapor lights

**Life cycle stage(s) covered for the reference product/service or baseline scenario**

Use stage

**Estimated avoided emissions (metric tons CO<sub>2</sub>e per functional unit) compared to reference product/service or baseline scenario**

2851.31

**Explain your calculation of avoided emissions, including any assumptions**

In most cases the luminaires installed replace previous ones, so we have the information on the consumption of the less sustainable options and those generated by our product, so that we can make an annual comparison in our linear projects.

**Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year**

0.01

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**Level of aggregation**

Product or service

**Taxonomy used to classify product(s) or service(s) as low-carbon**

The EU Taxonomy for environmentally sustainable economic activities

**Type of product(s) or service(s)**

Road	Other, please specify (Tyre powder additive for asphalt mixtures)
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**Description of product(s) or service(s)**

Sacyr has developed an additive, RARx with more than 60% of tyre dust in its composition, which allows its use in any work site and under any circumstance. This additive allows to make asphalts with a technical performance far above the conventional ones, which allows to reduce the need of thickness in the asphalt layers in more than 50%. In fact, SACYR has already used it in on a highway in Mexico. This product has an Environmental Product Self-Declaration (EPDD) which is based on a LCA. ADAP studies have evaluated different construction systems made with conventional asphalt mixes and with RARx asphalt mixes, with reductions of 45% in emissions. The additive would make it possible to recycle 100% of the used tires in each country and introduce them into the road. The RARx project has not only generated a new business model in the Group, with the creation of the subsidiary CIRTEC. It has enabled a new, much more efficient and durable construction system for SACYR's motorway concessions. In 2021, 927 t of rubber powder was used to manufacture 1,632 t of RARx. In addition, rubber powder is also used for the manufacture of improved bitumens, which are incorporated in the manufacture of mixes for road construction. Even though Sacyr drives efforts towards this kind of products, due to the high volume of turnover of the company as a global, the revenue obtained from them is diluted and represents <1% for the moment.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

Yes

**Methodology used to calculate avoided emissions**

Estimating and Reporting the Comparative Emissions Impacts of Products (WRI)

**Life cycle stage(s) covered for the low-carbon product(s) or services(s)**

Cradle-to-gate

**Functional unit used**

MWh consumed in the production of 1 highway km of 10 m width

**Reference product/service or baseline scenario used**

Conventional asphalt mixture

**Life cycle stage(s) covered for the reference product/service or baseline scenario**

Cradle-to-gate

**Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario**

57.57

**Explain your calculation of avoided emissions, including any assumptions**

We calculated the MWh of electricity production equivalent to the carbon footprint saved in each of the three scenarios defined (different mixtures), based on the amount of RAR-X produced and the amount of recycled NFU powder used to manufacture RAR-X and thus asphalt mixes.

**Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year**

0.01

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**C5. Emissions methodology**

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**C5.1**

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**(C5.1) Is this your first year of reporting emissions data to CDP?**

No

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**C5.1a**

(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

Row 1

Has there been a structural change?

No

Name of organization(s) acquired, divested from, or merged with

<Not Applicable>

Details of structural change(s), including completion dates

<Not Applicable>

## C5.1b

(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	No	<Not Applicable>

## C5.2

(C5.2) Provide your base year and base year emissions.

### Scope 1

Base year start

January 1 2020

Base year end

December 31 2020

Base year emissions (metric tons CO2e)

119657.23

Comment

### Scope 2 (location-based)

Base year start

January 1 2020

Base year end

December 31 2020

Base year emissions (metric tons CO2e)

301092.15

Comment

### Scope 2 (market-based)

Base year start

January 1 2020

Base year end

December 31 2020

Base year emissions (metric tons CO2e)

290433.97

Comment

### Scope 3 category 1: Purchased goods and services

Base year start

January 1 2020

Base year end

December 31 2020

Base year emissions (metric tons CO2e)

1299488.54

Comment

**Scope 3 category 2: Capital goods**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

184713.11

**Comment**

**Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

95166.15

**Comment**

**Scope 3 category 4: Upstream transportation and distribution**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

608.86

**Comment**

**Scope 3 category 5: Waste generated in operations**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

205531.99

**Comment**

**Scope 3 category 6: Business travel**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

5297.69

**Comment**

**Scope 3 category 7: Employee commuting**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

20563.31

**Comment**

**Scope 3 category 8: Upstream leased assets**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

212457.77

**Comment**

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

92.23

**Comment**

**Scope 3 category 10: Processing of sold products**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

56.68

**Comment**

**Scope 3 category 11: Use of sold products**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

23

**Comment**

**Scope 3 category 12: End of life treatment of sold products**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

0

**Comment**

SACYR offers RARx for sale in small volumes, a product that is blended to produce asphalt fabrics with a long service life. It is not possible to know either its contribution to the total product for final treatment purposes or the type of treatment that will be undertaken at its end of life, which is expected to be decades away. For this reason, coupled with the small volume placed on the market, it is considered insignificant (estimated in less than 0,001%) and this category not relevant.

**Scope 3 category 13: Downstream leased assets**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

0

**Comment**

SACYR does not own any asset leased to third parties, therefore we do not consider this category as a relevant one for us.

**Scope 3 category 14: Franchises**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

0

**Comment**

The business model of Sacyr do not include franchises, therefore we do not consider this category as a relevant one for us.

**Scope 3 category 15: Investments**

**Base year start**

January 1 2020

**Base year end**

December 31 2020

**Base year emissions (metric tons CO2e)**

1690204.72

**Comment**

**Scope 3: Other (upstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

C5.3

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**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

Other, please specify (Sacyr's carbon footprint calculation procedure according to ISAE3410)

C6. Emissions data

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C6.1

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**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

**Gross global Scope 1 emissions (metric tons CO2e)**

119083.68

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

This figure accounts for Sacyr's emissions derived from fuel consumption associated with owned fleet and machinery, fuel consumption in stationary equipment, and leakage of refrigerant gases on existing air conditioning equipment in our facilities.

C6.2

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**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

**Scope 2, location-based**

We are reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

Scope 2 emissions consider Sacyr's consumption of electricity, accounting both renewable and conventional. By offering both figures we track and drive renewable energy supply, which we aim to increase significantly in the coming years.

C6.3

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**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

**Scope 2, location-based**

380912.45

**Scope 2, market-based (if applicable)**

274570.05

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

Scope 2 figures take into account Sacyr's emissions from the electric power consumption in our facilities.

**C6.4**

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**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

No

**C6.5**

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**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

**Purchased goods and services**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

1647194.47

**Emissions calculation methodology**

Hybrid method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

46

**Please explain**

Due to the nature of Sacyr's different business units, there is an important volume of goods and services purchased yearly. For this reason, this category is considered relevant and actually entails the greatest emission percentage of Scope 3. This covers the complete list of SACYR purchases in order to have a clear view of where the focus of reductions should be set on. To calculate the emissions of water usage, we took the total amount of m3 of purchased water and use the emission factor of supply water. In the case of key raw materials, paper, steel, asphalts, lubricants, soil, concrete, sand and gravel have been considered. We took total amount in tons and use emission factors from life cycle analysis of each of the materials considered so to get kgCO2e. Expenses and other procurement data are managed through the internal system or financial balance of each business unit/society, from which billing is generated and/or accounted. The systems have allowed tracking every reference of each material or service acquired and other related specific information. Indirect emissions from this were then calculated using the Comprehensive Environmental Data Archive (CEDA) 5.0, which is an economic input-output database. CEDA provides information about embodied lifecycle emissions per unit of currency (€) spent on items used in over 400 sectors.

**Capital goods**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

41328.62

**Emissions calculation methodology**

Spend-based method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

**Please explain**

Expenses on capital goods data are managed through the profit and loss balance of each business unit/society, in which new amortization is accounted. Indirect emissions from this were then calculated using the Comprehensive Environmental Data Archive (CEDA) 5.0, which is an economic input-output database. CEDA provides information about embodied lifecycle emissions per unit of currency (€) spent on items used in over 400 sectors.

## Fuel-and-energy-related activities (not included in Scope 1 or 2)

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

131695.17

### Emissions calculation methodology

Fuel-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

This category consists of emissions associated with the production of fuels and the energy acquired and consumed by SACYR that were not considered in Scope 1 and 2's inventory. This includes emissions from extraction, production and transport of fuels consumed by SACYR. As well as the emissions from the extraction, production and transport of fuels associated with the generation of electricity, vapour, heat or refrigeration as well as leaks during transportation. In the case that the fuel consumption is from stationary, vehicles and mobile installations, the calculation consists of the corresponding DEFRA's Well to Tank (WTT) for each fuel under the same denomination used in Scope 1 calculations. If DEFRA's factor was not used for Scope 1, an emissions factor percentage of what the emissions factor of Scope 3 represents over Scope 1's, according to DEFRA for the UK, would be calculated and applied to ensure consistency. For the fuels consumed by the production of energy, the fuel extraction emissions factor depends on the origin of the energy. For energy from renewables, the factor will be zero. When the energy does not have a Renewable Origin Guarantee, the calculation is carried out with the upstream emissions factor of the WTT net (a sum of the WTT for the energy production), the distribution losses and the WTT of this distribution factors.

## Upstream transportation and distribution

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

439.77

### Emissions calculation methodology

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

63

### Please explain

This category encompasses those emissions from transport and distribution of products acquired by SACYR in vehicles that are not the property of SACYR (e.g. physical messaging services, general goods transportation, etc.). First, the total kilometres travelled in each type of transport is calculated with the number of trips and kilometres travelled. Then, the distance is multiplied by the transported weight and the emission factor relevant to the type of vehicle. When there is no information about the fuel type, the more conservative fuel estimate is used. Some purchase categories referring to logistics made by third party vehicles that were identified on the purchase goods and services calculation have been reclassified in here using an input-output method taking emissions factors from CEDA data base.

## Waste generated in operations

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

38143.89

### Emissions calculation methodology

Waste-type-specific method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Due to SACYR's different business activities, the waste generated in operations is considered relevant. Waste is classified by business activity, type of waste and treatment, therefore based on the quantity (kg) of each waste we can map it to a specific emission factor that fits both the type of dispose and the final treatment applied to it. The emission factors used are those published by DEFRA (Department for Business, Energy & Industrial Strategy), "UK Government GHG Conversion Factors for Company Reporting", in the latest version available and in force at the time of the carbon footprint calculation.

## Business travel

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

5332.06

### Emissions calculation methodology

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

This category encompasses the emissions associated to the transportation of employees for business-related activities by plane, train, rental car and nights in hotels. The activity data is compiled through Sacyr's travel agencies considering distance travelled. To calculate the CO2e emissions, the activity data is multiplied by its corresponding emission factors. The emissions factors used for the calculations derive from DEFRA (Department for Business, Energy & Industrial Strategy), "UK Government GHG Conversion Factors for Company Reporting" for flights, and from the "Guía práctica para el cálculo de emisiones de gases efecto invernadero" of the Catalan Climate Change Office for trains. To calculate CO2e emissions for nights in hotels, the number of nights is multiplied by its corresponding emission factors. These originate from DEFRA's database, which offers emission factors for different countries. When not available, a factor from a similar country (size, geopolitically, area, etc) is used. If the case arises where there is no number of nights but there is a monetary quantity, the emissions factor used comes from the Comprehensive Environmental Data Archive's (CEDA), considering the following reference: "Accommodation - Hotels (except casino hotels)"

## Employee commuting

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

8773.14

### Emissions calculation methodology

Average data method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

1.4

### Please explain

These emissions include those associated with employees commuting from their homes to SACYR sites and offices. The calculation uses the mobility survey results conducted globally to all employees who hold an email account, which was extrapolated to all the invited ones, assuming a similar pattern. For the rest of the employees (without digital ID), estimations were conducted using the number of employees in each geography and the number of days worked (minus weekends, holidays). The general mobility patterns provide the commuting time and type of transport used, to which a mean speed, estimated during peak hour and city is applied to know travelled kilometres. This is then multiplied by the emissions factors taken from DEFRA's database to obtain the final emissions.

## Upstream leased assets

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

209726.5

### Emissions calculation methodology

Hybrid method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

97

### Please explain

This category covers emissions from upstream leased assets that are not included in scopes 1 and 2. This includes industrial plants over which SACYR has no operational control over. This calculation is analogous to the calculation of scopes 1 and 2, as well as of the plants with operational control. The corresponding emissions factors for fuels from stationary combustion and refrigerants from DEFRA are applied to the total kWh or kg. For scope 2 electricity, that does not come from renewable sources, in which case the emission factor is zero, then the factor would be the International Environmental Agency's (IEA) national mix figure according to Ecoinvent or the corresponding contracted marketer. Some purchase categories referring to machine rentals and leasing that were identified on the purchase goods and services calculation have been reclassified in here using an input-output method taking emissions factors from CEDA data base. Nevertheless, they entail less than a 4% of all upstream leased assets.

## Downstream transportation and distribution

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

207.47

### Emissions calculation methodology

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Included in this category are transportation and distribution emissions from third parties originating from the point of sale until the final consumer (not paid by SACYR) including retail and storage. A life cycle analysis for RARx was conducted. The calculation regarding downstream distribution consisted on multiplying the corresponding emissions factors for the associated transport type by travelled kilometres and tonnes to calculate the total CO<sub>2</sub> tonnes.

## Processing of sold products

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO<sub>2</sub>e)

140.98

### Emissions calculation methodology

Average product method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

This category includes emissions associated with the transformation of products that require so for their final operational use after their sale. The total CO<sub>2</sub> tonnes emitted calculation firstly consisted on finding out the quantity of RARx used in a standard work day. This was achieved by multiplying the number of hours needed to blend/install the RARx sold in the reporting year by the associated Ecoinvent emissions factor for the operations needed, considering the specific power of the processing machines as well as the electricity consumption.

## Use of sold products

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

57.2

### Emissions calculation methodology

Average product method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

This category includes emissions due to the use of products sold by the company. The final users are considered to be consumers as well as businesses. The total CO2 tonnes emitted calculation consists of finding out the quantity of RARx used in a standard workday. This was achieved by multiplying the number of hours needed to blend/install the RARx sold in the reporting year by the associated Ecoinvent emissions factor for the operations needed, considering the specific power of the processing machines as well as the electricity consumption. This category differs from the previous one as uses of RARx has been understood as the potential asphalt repairation required.

## End of life treatment of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

SACYR offers RARx for sale in small volumes, a product that is blended to produce asphalt fabrics with a long service life. It is not possible to know either its contribution to the total product for final treatment purposes or the type of treatment that will be undertaken at its end of life, which is expected to be decades away. For this reason, coupled with the small volume placed on the market, it is considered insignificant (estimated in less than 0,001%) and this category not relevant.

## Downstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

SACYR does not own any asset leased to third parties, therefore we do not consider this category as a relevant one for us.

## Franchises

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

The business model of Sacyr do not include franchises, therefore we do not consider this category as a relevant one for us.

**Investments**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

888700.84

**Emissions calculation methodology**

Investment-specific method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

This category includes SACYR's financial investments, covering companies in which it has a share but not control. The calculation methodology consists of applying to the invested companies' scope 1 and 2's footprint the percentage of shares SACYR has in the company. In the case of REPSOL, whose footprint is publicly reported, a direct allocation of emissions has been done based on the financial percentage applicable. For other investments (residual), we have been able to get primary fuel and electricity information, so we have calculate their Scope 1 and 2 emissions alike we did for our own sites.

**Other (upstream)**

**Evaluation status**

Not evaluated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Other (downstream)**

**Evaluation status**

Not evaluated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**C-CN6.6/C-RE6.6**

**(C-CN6.6/C-RE6.6) Does your organization assess the life cycle emissions of new construction or major renovation projects?**

	Assessment of life cycle emissions	Comment
Row 1	Yes, qualitative assessment	

**C-CN6.6a/C-RE6.6a**

**(C-CN6.6a/C-RE6.6a) Provide details of how your organization assesses the life cycle emissions of new construction or major renovation projects.**

	Projects assessed	Earliest project phase that most commonly includes an assessment	Life cycle stage(s) most commonly covered	Methodologies/standards/tools applied	Comment
Row 1	On a case by case basis	Design phase	Cradle-to-practical completion/handover	Other, please specify (BREEAM Certification and others)	Sacyr is a member of the BREEAM Certification Advisory Board. In 2021, we carried out 17 projects following the right criteria to earn one of these certifications (LEED, BREEAM, VERDE, CES HOSPITALES, GSAS DESIGN & BUILD, CEEQUAL, WELL and SITES c). Five projects have been initiated this year, four BREEAM and one SITES.

**C6.7**

**(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?**

No

**C6.10**

**(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.**

**Intensity figure**

0.0000841974

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

393653.7

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

4675366280

**Scope 2 figure used**

Market-based

**% change from previous year**

6.61

**Direction of change**

Decreased

**Reason for change**

Sacyr has been working towards the achievement of its GHG reduction target. Our intensity figure has decreased, which is extremely positive. Decoupling our economic growth (+2.8%) from our emissions, in 2021 we began to implement various initiatives, all of which are framed within the lines of action envisioned in the Climate Change Strategy and coordinated by various working groups comprising specialists that represent the different companies that make up Sacyr. Among the great raft of measures that were taken, is worth mentioning the energy saving and efficiency measures such as the replacement of equipment and facilities with more efficient systems (Sacyr Construction), replacement of conventional lighting with LEDs in several sites (Sacyr Concessions and Valoriza), power generation using renewable sources (installation of solar panels for lighting towers use in Sacyr Construction – Chile), modulation of the turbines of the biological reactor of WWTP through the installation of oxygen sensors (Sacyr Water – Emmaasa, Canary Islands), and the renewal of part of our fleet (cars, vans and trucks) for more efficient vehicles in service agreements (see C4.3b). However, the primary reason behind the significant decrease in emissions in 2021 compared to 2020 relates to renewable energy: • At the desalination plant in Perth, Australia, our biggest water treatment plant under a concession agreement, renewable energies now represent more than half of its consumption, all provided by a solar plant and a wind farm specifically built to support the plant. • In 2021, a framework agreement was signed with one of Spain's leading energy suppliers for the supply of clean energy to most of Sacyr's facilities.

**C7. Emissions breakdowns**

**C7.1**

**(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?**

Yes

**C7.1a**

**(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).**

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	117392.73	IPCC Fifth Assessment Report (AR5 – 100 year)
CH4	32.4	IPCC Fifth Assessment Report (AR5 – 100 year)
N2O	1611.59	IPCC Fifth Assessment Report (AR5 – 100 year)
Other, please specify (Refrigerants)	46.96	IPCC Fifth Assessment Report (AR5 – 100 year)

**C7.2**

**(C7.2) Break down your total gross global Scope 1 emissions by country/region.**

Country/Region	Scope 1 emissions (metric tons CO2e)
Algeria	19.11
Australia	308.22
Chile	10055.49
Colombia	16906.35
Brazil	3248.05
Canada	0.22
United States of America	7423.64
Gibraltar	18.34
Ireland	0
Mexico	49.52
Paraguay	7299.25
Peru	18452.67
Portugal	2518.64
Qatar	1808.63
United Kingdom of Great Britain and Northern Ireland	4084.6
Uruguay	4477.63
Oman	0
Spain	42413.32

**C7.3**

**(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

- By business division
- By activity

**C7.3a**

**(C7.3a) Break down your total gross global Scope 1 emissions by business division.**

Business division	Scope 1 emissions (metric ton CO2e)
Engineering and infrastructures (Construction)	82039.41
Concessions	2890.94
Services	34153.33

**C7.3c**

**(C7.3c) Break down your total gross global Scope 1 emissions by business activity.**

Activity	Scope 1 emissions (metric tons CO2e)
Lighting devices distribution	7.74
Airport construction	7365.59
Road and highway construction	52946.33
Dam construction	399.13
Building and refurbishment	4716.53
Infrastructure operation and maintenance	5144.86
Subscriber management	1.34
Facilities management	212.63
Infrastructure maintenance	61.57
Maintenance and operation of water facilities (desalination plants, network, cycle)	716.78
Railway works	9363.46
Hydraulic works	117.97
Offices (Concessions)	1358.82
Offices (Construction)	2014.15
Ports, docks and other constructions	3458.55
Restoration	173.3
Services of a social nature and assistance to the elderly	423.91
Regulated parking and vehicle removal services	21.89
Cleaning services and care of green areas	18987.46
Waste treatment and recovery	2717.06
Other transport (independently registered through specific payment cards)	8874.62

## C7.5

**(C7.5) Break down your total gross global Scope 2 emissions by country/region.**

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Algeria	109152.2	109152.19
Australia	172831.71	82343.36
Canada	0.83	0.83
Chile	24876.09	24876.09
Colombia	1006.86	1006.85
Spain	28007.16	12301.33
United States of America	17.12	17.11
Gibraltar	151.31	151.3
Ireland	16.83	16.83
Mexico	3.6	3.59
Oman	43963.8	43963.8
Paraguay	17.74	17.74
Peru	43.85	43.85
Portugal	309.81	161.57
Qatar	68.42	68.42
United Kingdom of Great Britain and Northern Ireland	34.33	34.33
Brazil	410.78	410.78

## C7.6

**(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.**

By business division

By activity

### C7.6a

**(C7.6a) Break down your total gross global Scope 2 emissions by business division.**

Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Engineering and infrastructures	6250.88	5595.47
Services	10874.56	3070.88
Concessions	363787.01	265903.7

### C7.6c

**(C7.6c) Break down your total gross global Scope 2 emissions by business activity.**

Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Tourism assets	73.65	0
Lighting devices distribution	36.83	36.83
Airport construction	112.83	112.83
Road and highway construction	3184.57	3162.05
Dam construction	316.43	254.49
Building and refurbishment	1419.74	1240.84
Infrastructure operation and maintenance	6622.71	4844.91
Subscriber management	2.2	0.08
Facilities management	10.28	10.28
Headquarters	267.09	98.46
Infrastructure maintenance	2.48	1.49
Maintenance and operation of water facilities (desalination plants, network, cycle)	357164.61	260957.73
Railway works	476.68	439.82
Hydraulic works	3.33	2.46
Offices (Concessions)	241.51	134.07
Offices (Construction)	468.45	282.77
Ports, docks and other constructions	1.75	1.75
Restoration	613.72	3.52
Services of a social nature and assistance to the elderly	791.79	86.33
Regulated parking and vehicle removal services	19.7	3.31
Cleaning services and care of green areas	673.2	117.17
Waste treatment and recovery	8408.89	2778.85

**C7.9**

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Decreased

**C7.9a**

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	75982	Decreased	18.52	Sacyr consumes renewable energy by using 100% decarbonized suppliers with a zero-market emission factor and by purchasing Guarantees of Origin from other suppliers or autogenerating its own (26% of total). The reason behind the significant decrease in emissions in 2021 compared to 2020 is mainly due to: • At the desalination plant in Perth, Australia, our biggest water treatment plant under a concession agreement, renewable energies now represents more than half of its consumption, all provided by a solar plant and a wind farm specifically built to support the plant. This resulted in a reduction of emissions from 147,919 tCO2e to 83,143 tCO2e. • In 2021, a framework agreement was signed with one of Spain's leading energy suppliers for the supply of clean energy to most of Sacyr's facilities. While consumption remained stable (+1%), the use of renewable energy increased from 10.32% to 52.79%. This led to a reduction in emissions, from 23,808 to 12,602 tCO2e. Emissions reduced = (147,919-83,143)+(23,808-12,602)= 75,982 tCO2e Emission value %= 75,982.00/410,091.20 *100=18.52% Note that 410,091.20 tCO2e was our Scope 1 and 2 2020 carbon footprint.
Other emissions reduction activities	687.8	Decreased	0.16	Decrease due to emission reduction activities includes: 1. Replacement of luminaires with LED technology. Luminaires have been replaced in 6 centres, leading to a reduction in consumption of 167,043 kWh and a reduction in emissions of 66.89 tCO2e. 2. During the year 2021, energy efficiency improvements were carried out in our headquarters, reducing consumption by 52,249.22 kWh and thus reducing the emission of 7.84 tCO2e into the atmosphere (F.E. 0.15kg of CO2/kWh). 3. Two measures were carried out at the WWTP: one for energy efficiency: Modulation of the aeration turbines of the biological reactor of the WWTP through the installation of oxygen sensors and the installation of a solar photovoltaic plant, reducing the consumption of the WWTP by 626,088 kWh, and an associated reduction in emissions of 125.21 tCO2e (F.D.E. 2.0 kg of CO2/kWh). 4. Lighting towers have been replaced by photovoltaic panels in 6 works, achieving a reduction in consumption of 128,65 litres of diesel, and a reduction in emissions of 324.86 tCO2e. 5. Installation of a boiler powered by the biogas from the landfill to evaporate the leachate and reduce the carbon footprint associated with its treatment by an external manager, reducing consumption by 9,59 litres of diesel A (F.D.E 2.51 kg of CO2/l) and thus reducing emissions by 24.09 tCO2e. 6. Replacement of 10 cars, 4 machines, 3 lorries and 4 vans with more efficient technology, reducing fuel consumption by 52,94 litres of diesel and associated emissions by 138.91 tCO2e. Reductions from all the above measure sum 687.8 tCO2e. This has led to a change in emissions of 0.16% against 2020 figure. Emission value %= 687.8 /410,091.20 *100=0.16% Note that 410,091.20 tCO2e was our Scope 1 and 2 2020 carbon footprint. Please note offsets are not being accounted within the aforementioned figures.
Divestment		<Not Applicable >		
Acquisitions		<Not Applicable >		
Mergers		<Not Applicable >		
Change in output	69388.89	Increased	16.92	Although Sacyr's activity is fairly stable and is generally not affected by external elements, there is some variability between outputs from one year to the next depending on the services that have been carried out in the specific reporting year. This, in 2021, has led to an increase in emissions due to the recovery from the COVID 19 pandemic (with effects, albeit limited in our case). Note that we are in any case working to decouple our activity from the emissions generated, and total scope 1 + 2 emissions have decreased. Emission value %= 69,388.89 / 410,091.20 *100=16.92% Note that 410,091.20 tCO2e was our Scope 1 and 2 2020 carbon footprint.
Change in methodology		<Not Applicable >		
Change in boundary	9156.56	Decreased	2.23	Sacyr has the casuistry to operate depending on the number of active contracts and their characteristics. Normally these are medium or long-term projects, but some of them have been finished and other have started during the reporting year. Please note, nevertheless, that these represents a small amount of our emissions, and does not affect the structure of the company nor the current target. However, we monitorize year on year the potential changes in order to ensure any change in boundary is within the acceptable percentage that does not require a rebaseline. During 2021, 9,111.90tCO2e is a result of the changes coming from the following contracts: - Completion of contracts: 42 contracts (reporting fuel consumption) ended in 2021, resulting in a reduction of fuel consumption, and therefore scope 1 emissions, by 17,241 tCO2e. - Termination of contracts: 32 contracts (reporting electricity consumption) ended in 2021, resulting in a reduction of electricity consumption, and therefore of scope 2 emissions, by 1,429 tCO2e. - 31 new contracts started their activity and reported fuel consumption, increasing their emissions by 9,378 tCO2e. - 29 new contracts started their activity and reported electricity consumption, increasing their emissions by 135.44 tCO2e. Reductions accounting all the above measure sum (17,241+1,429)-(9,378+135.44)=9,156.56 tCO2e.This has led to a change in emissions of 2.23% against 2020 figure. Emission value %=9,156.56/410,091.20 *100=2.23% Note that 410,091.20 tCO2e was our Scope 1 and 2 2020 carbon footprint.
Change in physical operating conditions		<Not Applicable >		
Unidentified		<Not Applicable >		
Other		<Not Applicable >		

**C7.9b**

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

**C8. Energy**

**C8.1**

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 0% but less than or equal to 5%

## C8.2

### (C8.2) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

## C8.2a

### (C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	LHV (lower heating value)	88782.2	470535.32	559317.52
Consumption of purchased or acquired electricity	<Not Applicable>	151789.08	440042.94	591832.01
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	1769.55	<Not Applicable>	1769.55
Total energy consumption	<Not Applicable>	242340.82	910578.26	1152919.08

## C8.2b

### (C8.2b) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

## C8.2c

### (C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

#### Sustainable biomass

##### Heating value

LHV

##### Total fuel MWh consumed by the organization

20805.83

##### MWh fuel consumed for self-generation of electricity

20801.41

##### MWh fuel consumed for self-generation of heat

4.41

##### MWh fuel consumed for self-generation of steam

<Not Applicable>

##### MWh fuel consumed for self-generation of cooling

<Not Applicable>

##### MWh fuel consumed for self- cogeneration or self-trigeneration

<Not Applicable>

##### Comment

The 4.41 related biomass.

**Other biomass**

**Heating value**

LHV

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

**Other renewable fuels (e.g. renewable hydrogen)**

**Heating value**

LHV

**Total fuel MWh consumed by the organization**

67976.37

**MWh fuel consumed for self-generation of electricity**

67976.37

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

The biodiesel consumed by Sacyr during 2021 was considered to be 100% renewable

**Coal**

**Heating value**

LHV

**Total fuel MWh consumed by the organization**

0

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

<Not Applicable>

**Comment**

## Oil

### Heating value

LHV

### Total fuel MWh consumed by the organization

458292.77

### MWh fuel consumed for self-generation of electricity

457512.06

### MWh fuel consumed for self-generation of heat

780.71

### MWh fuel consumed for self-generation of steam

<Not Applicable>

### MWh fuel consumed for self-generation of cooling

<Not Applicable>

### MWh fuel consumed for self- cogeneration or self-trigeneration

<Not Applicable>

### Comment

The 780,71 related to gasoil heating.

## Gas

### Heating value

LHV

### Total fuel MWh consumed by the organization

12242.55

### MWh fuel consumed for self-generation of electricity

8539.58

### MWh fuel consumed for self-generation of heat

3702.98

### MWh fuel consumed for self-generation of steam

<Not Applicable>

### MWh fuel consumed for self-generation of cooling

<Not Applicable>

### MWh fuel consumed for self- cogeneration or self-trigeneration

<Not Applicable>

### Comment

The 3,702.98 are related to natural gas.

## Other non-renewable fuels (e.g. non-renewable hydrogen)

### Heating value

LHV

### Total fuel MWh consumed by the organization

0

### MWh fuel consumed for self-generation of electricity

0

### MWh fuel consumed for self-generation of heat

0

### MWh fuel consumed for self-generation of steam

<Not Applicable>

### MWh fuel consumed for self-generation of cooling

<Not Applicable>

### MWh fuel consumed for self- cogeneration or self-trigeneration

<Not Applicable>

### Comment

**Total fuel**

**Heating value**  
LHV

**Total fuel MWh consumed by the organization**  
559317.52

**MWh fuel consumed for self-generation of electricity**  
554829.42

**MWh fuel consumed for self-generation of heat**  
4488.1

**MWh fuel consumed for self-generation of steam**  
<Not Applicable>

**MWh fuel consumed for self-generation of cooling**  
<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**  
<Not Applicable>

**Comment**

**C8.2d**

**(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.**

	<b>Total Gross generation (MWh)</b>	<b>Generation that is consumed by the organization (MWh)</b>	<b>Gross generation from renewable sources (MWh)</b>	<b>Generation from renewable sources that is consumed by the organization (MWh)</b>
Electricity	291123.84	22570.96	291123.84	22570.96
Heat	0	0	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

**C8.2e**

**(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in C6.3.**

**Sourcing method**

Purchase from an on-site installation owned by a third party

**Energy carrier**

Electricity

**Low-carbon technology type**

Renewable energy mix, please specify (Solar and wind )

**Country/area of low-carbon energy consumption**

Australia

**Tracking instrument used**

Contract

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**

92359.84

**Country/area of origin (generation) of the low-carbon energy or energy attribute**

Australia

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**

**Comment**

In 2021, more than 53% of total consumption in the Southern Seawater plant in Perth, which entail the notably greatest consumption in the country, came from a renewable source. The low-carbon energy consumed originates from both a wind farm and a photovoltaic plant, built specifically to supply the plant.

---

**Sourcing method**

Green electricity products from an energy supplier (e.g. green tariffs)

**Energy carrier**

Electricity

**Low-carbon technology type**

Renewable energy mix, please specify (Mix of energies with certificated renewable attributes)

**Country/area of low-carbon energy consumption**

Spain

**Tracking instrument used**

GO

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**

59429.23

**Country/area of origin (generation) of the low-carbon energy or energy attribute**

Spain

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**

**Comment**

In 2021, Sacyr increased consumption of renewable electricity for the activities in Spain. The company managed to increase the consumption from 11% in 2020 to 53% in 2021. This is due to the increase in contracts signing with a guarantee of origin certificate.

---

**C8.2g**

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

**Country/area**

Algeria

**Consumption of electricity (MWh)**

176236.98

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

176236.98

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Australia

**Consumption of electricity (MWh)**

176405.69

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

176405.69

Is this consumption excluded from your RE100 commitment?  
<Not Applicable>

---

**Country/area**  
Brazil

**Consumption of electricity (MWh)**  
1957.98

**Consumption of heat, steam, and cooling (MWh)**  
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**  
1957.98

Is this consumption excluded from your RE100 commitment?  
<Not Applicable>

---

**Country/area**  
Canada

**Consumption of electricity (MWh)**  
4.15

**Consumption of heat, steam, and cooling (MWh)**  
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**  
4.15

Is this consumption excluded from your RE100 commitment?  
<Not Applicable>

---

**Country/area**  
Chile

**Consumption of electricity (MWh)**  
41941.57

**Consumption of heat, steam, and cooling (MWh)**  
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**  
41941.57

Is this consumption excluded from your RE100 commitment?  
<Not Applicable>

---

**Country/area**  
Colombia

**Consumption of electricity (MWh)**  
6397.2

**Consumption of heat, steam, and cooling (MWh)**  
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**  
6397.2

Is this consumption excluded from your RE100 commitment?  
<Not Applicable>

---

**Country/area**  
Spain

**Consumption of electricity (MWh)**  
112029.21

**Consumption of heat, steam, and cooling (MWh)**  
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**  
112029.21

Is this consumption excluded from your RE100 commitment?  
<Not Applicable>

---

**Country/area**  
United States of America

**Consumption of electricity (MWh)**  
32.02

**Consumption of heat, steam, and cooling (MWh)**  
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

32.02

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Gibraltar

**Consumption of electricity (MWh)**

162.67

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

162.67

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Ireland

**Consumption of electricity (MWh)**

26.41

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

26.41

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Mexico

**Consumption of electricity (MWh)**

6.23

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

6.23

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Oman

**Consumption of electricity (MWh)**

72979.87

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

72979.87

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Paraguay

**Consumption of electricity (MWh)**

2523.84

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

2523.84

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Peru

**Consumption of electricity (MWh)**

202.74

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

202.74

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Portugal

**Consumption of electricity (MWh)**

634.62

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

634.62

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Qatar

**Consumption of electricity (MWh)**

130.9

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

130.9

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

United Kingdom of Great Britain and Northern Ireland

**Consumption of electricity (MWh)**

161.7

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

161.7

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

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**C9. Additional metrics**

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**C9.1**

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**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**Description**

Waste

**Metric value**

9802035.82

**Metric numerator**

Wastes not destined for disposal

**Metric denominator (intensity metric only)**

11,616,372.27

**% change from previous year**

564

**Direction of change**

Increased

**Please explain**

At Sacyr we continue to work to include new waste solutions in our activities, enabling us to make further progress in the transition towards a more sustainable system. We apply the waste hierarchy principle: reduce generation, maximize reuse and recycling, favour recovery, including energy recovery, and avoid disposal. A good example here would be our construction projects, where we promote the reuse of excavated earth on site, thus reducing the acquisition of new resources and the generation of waste, which leads to energy savings, reduced emissions and lower costs. In addition, most projects have a waste management plan and set targets for reuse and recycling. Sacyr Zero Waste goal which will entail an 80% increase in the reuse of waste by 2025

**C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6**

**(C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?**

	Investment in low-carbon R&D	Comment
Row 1	Yes	

**C-CN9.6a/C-RE9.6a**

**(C-CN9.6a/C-RE9.6a) Provide details of your organization's investments in low-carbon R&D for real estate and construction activities over the last three years.**

**Technology area**

Other, please specify (Additive for bituminous mixtures manufactured from used tires' powder )

**Stage of development in the reporting year**

Small scale commercial deployment

**Average % of total R&D investment over the last 3 years**

≤20%

**R&D investment figure in the reporting year (optional)**

**Comment**

The RARx project has not only generated a new business model in the Sacyr Group, with the creation of the subsidiary CIRTEC, but it is also a project that has generated transversal benefits for the Group. It has enabled a new, much more efficient and durable construction system for SACYR's motorway concessions. This product has an Environmental Product Self-Declaration (EPDD) which is based on a Life Cycle Assessment (LCA), both of the RARx as well as the rubber powder itself manufactured at the Chiloeches plant, which is operated by Valoriza Servicios Ambientales, another Sacyr group company. In 2020, 354.65 t of rubber powder were used to manufacture RARx (65%). In addition, rubber powder is also used for the manufacture of improved bitumens, which are incorporated in the incorporated in the manufacture of bituminous mixes for road construction. In 2020, 540.07 t of rubber powder were used to manufacture this product in 2020. It should be noticed that, even though Sacyr is driving efforts towards this kind of products, due to the high volume of commercialization and turnover of the company as a global, the revenue obtained from them is diluted and represents less than a 1% for the moment.

**C-CN9.10/C-RE9.10**

**(C-CN9.10/C-RE9.10) Did your organization complete new construction or major renovations projects designed as net zero carbon in the last three years?**

No, but we plan to in the future

**C-CN9.11/C-RE9.11**

**(C-CN9.11/C-RE9.11) Explain your organization's plan to manage, develop or construct net zero carbon buildings, or explain why you do not plan to do so.**

At Sacyr we are committed to the fight against climate change and that is why we work to integrate this commitment into our services. We have been focusing for years on ensuring that our construction projects meet the highest sustainability standards in terms of materials and construction methods. For example, Sacyr is a member of the BREEAM Certification Advisory Board. In 2021, we carried out 17 projects following the right criteria to earn one of these certifications (LEED, BREEAM, VERDE, CES HOSPITALES, GSAS DESIGN & BUILD, CEEQUAL, WELL and SITES c). Five projects have been initiated this year; four BREEAM and one SITES. As for carbon neutral buildings, we have not yet carried out any, but it is in our plans as it is something we are currently already offering to some of our civil works clients. For example, we have recently participated in the tender for a net zero housing development in Fuenlabrada (Spain), pending resolution. It is certainly an additional value to our service that we would like to further promote in the future.

**C10. Verification**

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**C10.1**

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**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

**C10.1a**

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**(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

Third party verification statement for Scope 1, 2, and 3 SACYR.pdf

**Page/ section reference**

The independent limited assurance report on GHG statement 2021 can be found attached. The whole document includes detail on the verification performed by a third party entity (PWC). Please note we are attaching both Spanish and English version one after the other on the same document.

**Relevant standard**

ISAE 3410

**Proportion of reported emissions verified (%)**

100

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**C10.1b**

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**(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

**Scope 2 approach**

Scope 2 market-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

Third party verification statement for Scope 1, 2, and 3 SACYR.pdf

**Page/ section reference**

The independent limited assurance report on GHG statement 2021 can be found attached. The whole document includes detail on the verification performed by a third party entity (PWC). Please note we are attaching both Spanish and English version one after the other on the same document.

**Relevant standard**

ISAE 3410

**Proportion of reported emissions verified (%)**

100

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**C10.1c**

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**(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.**

**Scope 3 category**

Scope 3: Purchased goods and services

Scope 3: Capital goods

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

Scope 3: Upstream transportation and distribution

Scope 3: Waste generated in operations

Scope 3: Business travel

Scope 3: Employee commuting

Scope 3: Upstream leased assets

Scope 3: Investments

Scope 3: Downstream transportation and distribution

Scope 3: Processing of sold products

Scope 3: Use of sold products

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

Third party verification statement for Scope 1, 2, and 3 SACYR.pdf

**Page/section reference**

The independent limited assurance report on GHG statement 2021 can be found attached. The whole document includes detail on the verification performed by a third-party entity (PWC). Please note we are attaching both Spanish and English version one after the other on the same document.

**Relevant standard**

ISAE 3410

**Proportion of reported emissions verified (%)**

100

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**C10.2**

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**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

Yes

**C10.2a**

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**(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?**

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C6. Emissions data	Year on year emissions intensity figure	ISAE 3000	The financial figure which allows us to obtain Sacyr's emissions intensity ratio (comparable year on year) goes through a verification process and is published on Sacyr's Annual Report (pg 169), which is entirely verified by a third-party entity.
C8. Energy	Energy consumption	ISAE 3000	The energy consumption figures go through a verification process and is published on Sacyr's Annual Report (pg 168), which is entirely verified by a third-party entity.
C2. Risks and opportunities	Other, please specify (Risk and opportunity identification and management)	ISAE 3000	The governance and process for identifying risks and opportunities is detailed, together with the main risks identified listed down, go through a verification process and is published on Sacyr's Annual Report (5.2.2 Climate risks and opportunities – page 162), which is entirely verified by a third-party entity.
C4. Targets and performance	Other, please specify (Emission reduction target)	ISAE 3000	The validated science based target we established in 2021 is detailed together with our performance against it in our annual report (pg 157), and goes through a verification process which is entirely verified by a third-party entity.

**C11. Carbon pricing****C11.1****(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**

No, and we do not anticipate being regulated in the next three years

**C11.2****(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

Yes

**C11.2a****(C11.2a) Provide details of the project-based carbon credits originated or purchased by your organization in the reporting period.****Credit origination or credit purchase**

Credit origination

**Project type**

Transport

**Project identification**

"Proyectos Clima" is a scheme that has been developed by MITECO, Government of Spain with the aim of reducing Greenhouse Gas (GHG) emissions. They are a financing instrument, promoted through the FES-CO2, whose objective is to redirect national economic activity towards low-carbon models, thus contributing to the Spanish targets for reducing GHG emissions in the diffuse sector. The reductions in emissions generated by projects located in the national territory, reported annually to the FES-CO2, are verified by accredited greenhouse gas verifiers in accordance with the applicable regulations. The projects receive a payment for each ton of CO2 equivalent (tCO2e) reduced and verified. Our "Proyecto Clima" consists in the replacement of fossil fuel vehicles, by hybrid or electric ones. It was carried out by the business unit Valoriza Medioambiente in the urban cleaning and waste collection activities. The project currently includes three action points in different areas of the Spanish geography: Alcalá (20 vehicles), Barakaldo (7) and Melilla (7). The one in Alcalá started in 2017 and Barakaldo and Melilla started in 2020. Emission savings are accounted on an annual basis.

**Verified to which standard**

Other, please specify (FES-CO2)

**Number of credits (metric tonnes CO2e)**

47

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

47

**Credits cancelled**

Not relevant

**Purpose, e.g. compliance**

Voluntary Offsetting

**Credit origination or credit purchase**

Credit origination

**Project type**

Landfill gas

**Project identification**

Proyectos Clima" is an scheme that has been developed by MITECO, Government of Spain with the aim of reducing Greenhouse Gas (GHG) emissions. They are a financing instrument, promoted through the FES-CO2, whose objective is to redirect national economic activity towards low-carbon models, thus contributing to the Spanish targets for reducing GHG emissions in the diffuse sector. The reductions in emissions generated by projects located in the national territory, reported annually to the FES-CO2, are verified by accredited greenhouse gas verifiers in accordance with the applicable regulations. The projects receive a payment for each ton of CO2 equivalent

(tCO2e) reduced and verified. The other "Proyecto Clima" consists on the extraction, treatment and recovery of the biogas generated in the Miramundo landfill, in Medina Sidonia (Cádiz), specifically in its cells 1 and 2, still in operation, for its torch and motor burning 1333588,22. The activity started in 2016. The Activity would last until both cells are completely degassed. The methane emission capacity based on the anaerobic decomposition of the matter lasts up to 30 years after the waste disposal, although from the tenth year the intensity decreases considerably.

**Verified to which standard**

Other, please specify (FES-CO2)

**Number of credits (metric tonnes CO2e)**

77360

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

77360

**Credits cancelled**

Not relevant

**Purpose, e.g. compliance**

Voluntary Offsetting

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**Credit origination or credit purchase**

Credit purchase

**Project type**

Forests

**Project identification**

The company pledges for the offset of emissions as a mechanism to minimize its impact on the environment, at the same time supporting small local environmental conservation projects. In this year, 1500 tons of CO2 were offset, corresponding to emissions from trips made by the company's executives, 100 of them through the following project: La Burgalesa: reforestation project that aims to revitalise a deforested area at high risk of desertification by eliminating erosion risks, increasing biodiversity and improving soil structure and organic matter. It is implemented in Spain and is certified by the Ministry for Ecological Transition and Demographic Challenge.

**Verified to which standard**

Other, please specify (MITRED)

**Number of credits (metric tonnes CO2e)**

100

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

100

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit purchase

**Project type**

Forests

**Project identification**

The company pledges for the offset of emissions as a mechanism to minimize its impact on the environment, at the same time supporting small local environmental conservation projects. In this year, 1500 tons of CO2 were offset, corresponding to emissions from trips made by the company's executives, 1400 of them through the following project: IG FARMS Carbon Mitigation Project: reforestation project located in the municipality of La Apartada (Colombia). The main objective of the project is to move from an economic model based on livestock production towards activities based on sustainable reforestation of degraded areas, thus helping to restore the ecosystem and contributing to the economic growth of the area with the collaboration of local communities.

**Verified to which standard**

Other, please specify (Colombian Voluntary Carbon Market Scheme)

**Number of credits (metric tonnes CO2e)**

1400

**Number of credits (metric tonnes CO2e): Risk adjusted volume**

1400

**Credits cancelled**

Yes

**Purpose, e.g. compliance**

Voluntary Offsetting

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**C11.3**

**(C11.3) Does your organization use an internal price on carbon?**

Yes

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**C11.3a**

### (C11.3a) Provide details of how your organization uses an internal price on carbon.

#### Objective for implementing an internal carbon price

Navigate GHG regulations  
Stakeholder expectations  
Change internal behavior  
Drive energy efficiency  
Drive low-carbon investment

#### GHG Scope

Scope 1  
Scope 2

#### Application

The shadow price is an internal price of carbon, whose purpose is to anticipate future risks, thus helping to improve forecasting when studying the viability of a project. It also helps us anticipate the regulation of greenhouse gases. It is considered when selecting projects, managing risks, proposing offers, etc, as an extra cost.

#### Actual price(s) used (Currency /metric ton)

39.99

#### Variance of price(s) used

To calculate the Shadow Price, the following formula is proposed, which considers all the recommendations when calculating it. This formula returns us a table with the different prices by sectors and geographical areas, making the Shadow Price adapt as best as possible to all circumstances (differentiated pricing). Therefore, the final shadow price is the result of attributing a percentage the recommendation from the World Bank, the average price use in the sector, the maximum rice peers are using, the social cost, the price set on the region, the competition price, the cost of instruments, and finally the price of carbon in regulated markets. \*The figure indicated on the previous column responds to an average.

#### Type of internal carbon price

Shadow price

#### Impact & implication

The Shadow Price is used as an extra expense when calculating the Net Present Value of projects. The Shadow Price is therefore applied when studying the feasibility of an infrastructure project or an investment. In the formula to calculate the net present value of a project, the Shadow Price, multiplied by the tons of CO<sub>2</sub>, is taken into account as an expense. This expense is not direct, but it helps us to be proactive in terms of future risks derived from the increase in the cost of emissions. The project is analyzed twice: once without taking into account the price of carbon, and once considering it. Another way to use it is from the strategic and risk management approach. Depending on the NPV result, we can decide whether to accept, reject or mitigate this price. The aim is using this price in the Sacyr group's project selection processes with a medium- and long-term horizon, in order to promote investments in low-emission projects and thus reduce scope 1 and 2 emissions. The use of internal carbon pricing is relatively new in our company, so we recognize the importance of periodically reviewing its impact against its original intentions to refine its approach if needed to better meet future goals. Notably, as an example of its use, within the evaluation of the deployment of Perth's desalination plant, the impact of emissions was taking into account and lead to the construction of a nearby solar plant and a wind farm to supply its energy. Similar approaches were taking on our desalination plants in Algeria and Oman.

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#### Objective for implementing an internal carbon price

Navigate GHG regulations  
Stakeholder expectations  
Change internal behavior  
Drive energy efficiency  
Drive low-carbon investment

#### GHG Scope

Scope 1  
Scope 2

#### Application

The Implicit Price is an internal price of carbon calculated based on the objective costs of reducing emissions of our company, such as the purchase of renewable energies or the improvement of energy efficiency.

#### Actual price(s) used (Currency /metric ton)

19.05

#### Variance of price(s) used

The implicit carbon price has been calculated using the price of the renewable energy certificates of the different countries in which we operate, and therefore, it is an implicit price at scope 2 (much significant than scope 1), dependent on the yearly price of those certificates (evolutionary pricing).

#### Type of internal carbon price

Implicit price

#### Impact & implication

Its purpose is to favor the purchase of renewable energy, changing internal behavior when making decisions. The selected price is intended to be use in the energy purchase selection processes in the offices and facilities of the Sacyr group, in order to promote the purchase of clean energy in carbon and therefore reduce our Scope 2 emissions. This price also informs us about the economic profitability when it comes to reducing emissions. The lower the implicit price, the greater the emission reduction per euro invested. This helps us understand why it is better to start reducing emissions in certain countries, and so, prioritize. It also helps us when negotiating framework agreements with electricity distributors, having reference prices by country, which should not be exceeded under any circumstances. Procedure to calculate it: 1. A list of EAC (Energy Attribute Certificate) prices from the different countries in which Sacyr operates was requested. 2. With the consumption broken down by country, multiplying each one by its corresponding EAC, we obtain the extra cost that it would have to switch our electricity consumption to clean CO<sub>2</sub> energy. 3. Multiplying the country's consumption by the emission factors, we have the CO<sub>2</sub> emissions emitted by electricity consumption by country. 4. Dividing the additional cost of using green energy by the number of tons of CO<sub>2</sub> emitted in to the atmosphere, we obtain the cost of avoiding one ton of CO<sub>2</sub> per country.

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## C12. Engagement

### C12.1

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**(C12.1) Do you engage with your value chain on climate-related issues?**

- Yes, our suppliers
- Yes, our customers/clients
- Yes, other partners in the value chain

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**C12.1a****(C12.1a) Provide details of your climate-related supplier engagement strategy.****Type of engagement**

Information collection (understanding supplier behavior)

**Details of engagement**

Collect climate change and carbon information at least annually from suppliers

**% of suppliers by number**

54.37

**% total procurement spend (direct and indirect)**

91

**% of supplier-related Scope 3 emissions as reported in C6.5**

0

**Rationale for the coverage of your engagement**

Sacyr considers it to be a priority to prevent any risks arising from its supply chain and in the goods and services produced or provided by the companies forming part of this chain. On 17 December 2020, Sacyr's Board of Directors approved the Supply Chain Management Policy, which defines and establishes Sacyr's sustainability principles and commitments and those of its suppliers in the area of sustainability, from an environmental, social, regulatory, ethical and health and safety perspective, throughout the whole life cycle of its projects. To reinforce this commitment, and aware of the fact that suppliers have a direct effect on Sacyr's general environmental impact, especially in terms of GHG emissions, Sacyr carries out an ESG risk analysis of our most significant supplier portfolio, taking into account chronological and business volume contracting criteria. We assess and prioritize within purchasing decisions those suppliers that represent a relative important turnover for the company, as well as those whose activities that could potentially have a substantial impact on contracts and/or the environment. The amount of suppliers by number that perform critical activities and are therefore exposed to this assessment in which environmental (including climate) information is required and assessed totaled 2,804 suppliers in 2021 (on a regular basis and/or at the end of their service), representing around more than 91% in spend. 98.5% of the assessed suppliers fulfilled the evaluation criteria. For more information, please see pages 127-128 of our annual report.

**Impact of engagement, including measures of success**

In 2021, we continued to develop and implement our PROCURA software application to manage procurement and apply ESG criteria. Through this process, suppliers are initially assessed with environmental criteria (environmental and energy certificates, eco-labels, calculation of the carbon and water footprint and their biodiversity activities) and social criteria (whether it complies with the United Nations Global Compact or whether they have projects that benefit the community), among others. To measure possible environmental impacts in the supply chain, Sacyr performs necessary controls, which may be: audits, visits to facilities and analysis of complaints and/or claims, analyzing whether the projects being carried out by us have any possible effects on local communities. At the end of the contract, a final evaluation is carried out to analyze the general compliance of the supplier based on the achievement expectations agreed and notified prior to their assessment. Our measure of success would be an increase in the number of suppliers from whom we collect information by at least 3% per year. Suppliers must obtain 2 out of 3 points in environmental practices and environmental documental compliance, in order to be included in further processes. Not achieving the expected result lead to the agreement of mandatory improvements or to the termination of the collaboration. In this sense, Sacyr acts as a motor force to promote sustainable behavior within suppliers. The objective, and measure of success, is for all of Sacyr's suppliers to have an Environmental Management System. Therefore, the more suppliers within total that can prove its implementation and show great performance on the initial assessment, the greater the success is considered. An example of the impact of this climate-related supplier engagement path chosen, a negative impact was detected in a contract from Colombia. As a result of its knowledge and of the investigation of events, Sacyr interrupted the contract with supplier that couldn't meet the requirements and provided it with an unfavorable assessment, to ensure that it could not enter into future new agreements with Sacyr. Nevertheless, this is generally not the common situation, and indeed, in 2021, we increased the number of suppliers that meet environmental and social criteria by 17%, entailing such a positive outcome of our influence.

**Comment**

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**C12.1b**

**(C12.1b) Give details of your climate-related engagement strategy with your customers.**

**Type of engagement & Details of engagement**

Education/information sharing	Share information about your products and relevant certification schemes (i.e. Energy STAR)
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**% of customers by number**

100

**% of customer - related Scope 3 emissions as reported in C6.5**

0

**Please explain the rationale for selecting this group of customers and scope of engagement**

Sacyr's environmental performance (including climate-related issues) is published on its website and in different mainstream reports. The company includes also this information in tenders when relevant. For this reason, it is considered that all of Sacyr's customers are aware and engaged through information sharing. In addition, Sacyr has recently created a new business division called Sacyr Green. This BU has as an objective the development of emerging and innovative businesses around sustainability with topics that revolve around circular economy and energy efficiency, entailing an attractive service line for new and existing customers. Please note 0 is indicated as % of customer-related emissions as the % of Scope 3 related to products is notably negligible, being Sacyr mainly a service company.

**Impact of engagement, including measures of success**

There is a growing tendency to include climate-related issues in public tenders, as more information about it is being required for the decision process. Sacyr shares information on the company's environmental performance and management of climate-related issues specific to each contract when these matters influence in the awarding decision. Our measure of success is receiving the awarding of projects where sustainability and climate-related behaviors played a role in the decision (ratio: tenders in which information was specifically shared/projects awarded). The more the projects in which this is a deciding factor won, the more successful the engagement is. Currently, the threshold we could expect is winning at least a 30% - 40% of the projects in which we have shared specific environmental information within our approach. Recently, especially in Spain, in line with the strategic path that civil infrastructure is taking following the guidelines of the Climate Change national Law, environmental performance is increasingly valued, to the point of being a key factor in tenders. One example of a project awarded to Sacyr under the forementioned considerations was a train track construction project in the South of Spain. The deciding factor in the final awarding of the contract was Sacyr's environmental and energy performance as stated by the client. By this means, sharing information with our potential clients reinforce our awareness about how important and strategic climate-related issues are as in the upcoming years our business growth may depend on our climate performance.

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**C12.1d**

**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

In terms of climate-related engagement strategy with other partners in the value chain, Sacyr considers them to be working groups, associations and industry initiatives.

In the reporting years, Sacyr indeed continued to join international initiatives to create alliances that contribute to climate action, as established in the Sustainable Sacyr Plan.

Its engagement strategy consists of: prioritizing those thoroughly consistent with Sacyr's core principles or those that may entail positive impact and value creation for the company and its upstream and downstream activities (the more aligned the principles, the greater focus/resource dedication on the engagement), representatives of the company (selected depending on the technicism or diplomacy required) attend conferences, participate in meetings, report information on the company's performance on climate-related issues, participate in collaborative projects and give presentations on sustainability and climate-related topics. The success of these engagements could be measured by whether their outcomes lead to further collaborations, conversations and visibility of our climate change actions.

In 2021, Sacyr was a member of the following initiatives which involve, among other matters, and at an international level, a commitment towards the fight against climate change: UN Global Compact, UN Race to Zero, Forética's Climate Change Cluster, Forética Sustainable Cities 2030, Spanish Green Growth Group, Community #PorElClima, Hydrology Institute, Pact for the Circular Economy, and member of the BREEAM Certification Board.

Worth mentioning as well that on the celebration of the COP 26 summit, Sacyr participated in a panel discussion around collaborative action in the built environment presenting how the company can help to achieve the goal of net zero emissions by involving the supply chain, promoting the use of sustainable materials and efficient equipment in the construction sector, as well as highlighting the importance of designing from the concept of the life cycle of the asset.

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**C12.2**

**(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization's purchasing process?**

Yes, climate-related requirements are included in our supplier contracts

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**C12.2a**

**(C12.2a) Provide details of the climate-related requirements that suppliers have to meet as part of your organization's purchasing process and the compliance mechanisms in place.**

**Climate-related requirement**

Climate-related disclosure through a non-public platform

**Description of this climate related requirement**

In 2021, Sacyr has continued to develop and implement the PROCURA app, used for all purchasing procedures. Through this process, suppliers are initially assessed with environmental criteria among others. Contracts with our suppliers include ESG clauses, which they are required to adopt as their own, as well as the respect of our Code of Conduct and our corporate policies, all of which are available on our website and on the specific supplier website: <https://documentacionproveedores.sacyr.com>. Additionally, the supplier approval process at Sacyr involves frequent analysis, both initially and at the end of their activities based on the achievement expectations agreed and notified prior to their assessment. Sacyr performs the necessary controls, which may be: audits, visits to facilities and analysis of complaints and/or claims, analyzing whether the projects being carried out by us have any possible effects on local communities. Sacyr has shown the importance of engaging and evaluating their suppliers. After the evaluation, suppliers that are non-compliant with Sacyr's standards (only 42/5,157 in 2021) need to attain and implement noticeable improvements or face a termination of the relation. On the reporting year 47,6% of suppliers that were non-compliant have committed to implement noticeable improvement, and the other 52,4% of suppliers had their contracts terminated.

**% suppliers by procurement spend that have to comply with this climate-related requirement**

91

**% suppliers by procurement spend in compliance with this climate-related requirement**

90

**Mechanisms for monitoring compliance with this climate-related requirement**

Certification  
Supplier self-assessment  
On-site third-party verification

**Response to supplier non-compliance with this climate-related requirement**

Suspend and engage

**C12.3**

**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage directly with policy makers  
Yes, we engage indirectly through trade associations  
Yes, we engage indirectly by funding other organizations whose activities may influence policy, law, or regulation that may significantly impact the climate

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

Yes

**Attach commitment or position statement(s)**

Sacyr adhesion Compromiso Clima ENG\_v2.pdf

**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

The company ensures at all times that all of its direct and indirect activities are consistent with its overall climate change approach, thus reducing risks and impacts, as well as fostering opportunities. Sacyr indeed released at the end of 2021 its Corporate Climate Change Strategy that takes into account all of Sacyr's business areas and activities in the definition of targets and action lines, including its engagement approach. In order to ensure that all of our activities that influence policy are consistent with our strategy towards climate related issues, 3 committees are in place with responsibilities to review, accept or prevent actions. As new activities will require the acceptance of at least one of these committees, we consider they entail a method to prove that activities are aligned with the core principles of our strategy. 1. The Sustainability and Corporate Governance Committee is mainly responsible for supervising and proposing ESG policies. The committee is made up of a majority of independent directors of different business units. 2. The Sustainability Committee is in charge of developing and executing the actions related to sustainability within a strategy aligned with the ODS. This committee is chaired by the group's CEO, and is made up of the general corporate manager, the general HR managers, the general comms and sustainability management, the business legal department, the secretary of the board of directors, and the heads of other business areas. 3. The Management System Committee has to prepare a study and analysis of the context and stakeholders, analyze the System Review Report, carry out the final consolidation of risks and opportunities. As examples of activities, following our statement commitment to Business Ambition for 1.5 and our SBTs, in Nov 2021, Sacyr adhered to the Race To Zero campaign of the United Nations to lead the drive towards a carbon-neutral economy. Being part of this initiative is a way of backing up the objective of moving towards a net zero economy as promoted by COP26 in which companies need to enlarge their contribution for the Paris Agreement. Moreover, within the context of being part of the Spanish Green Growth Group, the company has developed the Best Practice Guidance for Corporate Climate Action Plans, presented in Glasgow, which recognizes the 12 most important elements considered to be best practices to develop a long-term climate action plan.

**Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**C12.3a**

**(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?**

**Focus of policy, law, or regulation that may impact the climate**

Taxes on products

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Draft of Royal Decree, Approving the Regulation on the Tax on Fluorinated Greenhouse Gases

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

Spain

**Your organization's position on the policy, law, or regulation**

Support with no exceptions

**Description of engagement with policy makers**

Sacyr is being part of the definition process of the Fluorinated Greenhouse Gas Tax Regulation (IGFEI), yet to be approved in September 2022 (expected). Even though, a balance of the consumption of fluorinated gases in Spain shows that their use increased until 2008, stabilized until the entry into force of the first IGFEI, and decreased significantly from 2015 onwards. The IGFEI has contributed to reducing emissions of fluorinated gases in Spain as it encourages the use of safe and energy-efficient alternative technologies with zero or less impact on the climate, so it stands as an important pillar of environmental taxation, which justifies its maintenance. However, it is necessary to introduce greater simplicity of the tax, which will contribute to better compliance with the regulation. Sacyr has been involved by sending general comments towards the drafting of the Royal Decree Project in coordination with the Department of Industry, Energy, Environment and Climate.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

<Not Applicable>

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Other, please specify (Carbon Emissions Accounting)

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

CountEmissions EU

**Policy, law, or regulation geographic coverage**

Regional

**Country/region the policy, law, or regulation applies to**

Europe

**Your organization's position on the policy, law, or regulation**

Support with minor exceptions

**Description of engagement with policy makers**

The European Commission aims to implement a common framework for the calculation and reporting of GHG emissions related to transport. Sacyr participated by providing their comments on the initial impact assessment of this previously mentioned initiative. This new framework will apply to both the passenger and freight sectors and will provide the necessary transparency for suppliers to monitor and reduce their emissions, thus improving the efficiency of their service. Its main objective is to incentivize the reduction of emissions.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Sacyr considered that thanks to its experience in the construction and operational concession of linear mobility infrastructures, it could offer a realistic view of the difficulties that the implementation of the initiative may face. Specific cases were raised.

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Renewable energy generation

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Royal Decree partially transposing Directive 2018/2001 on the promotion of the use of energy from renewable sources

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

Spain

**Your organization's position on the policy, law, or regulation**

Support with minor exceptions

**Description of engagement with policy makers**

Sacyr made formal allegations to the Royal Decree partially transposing Directive 2018/2001 on the promotion of the use of energy from renewable sources as we consider that the Royal Decree should promote the use of residual raw materials, in the interests of the efficient and sustainable use of resources and the circular economy. It should be therefore borne in mind that promoting the production of biogas from waste and its transformation into biomethane will contribute not only to meeting the energy and climate objectives, but also to meeting the recycling and recovery objectives derived from the new waste directives, which are currently in the transposition phase.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Given that Law 22/11 on waste and contaminated soils, which is mentioned in the draft of this Royal Decree, will soon be repealed by the new Waste Law, which transposes Directive (EU) 2018/851 and incorporates important new features, Sacyr's proposal is that the future Royal Decree should be aligned and based exclusively on the new regulatory framework that is coming to us and eliminate all references to Law 22/2011, otherwise the document that is finally approved will be a document that will quickly become obsolete.

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**C12.3b**

**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may**

**impact the climate.**

**Trade association**

Other, please specify (SEOPAN: Association of Infrastructure Contractor and Concessionaires of Spain)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

SEOPAN aims to encourage and defend the private initiative, a market economy, free enterprise in the construction sector, infrastructure and water technology concessions, and to protect the common interests of its affiliates before public administrations, institutions, and society, in addition to representing them both in Spain and abroad. The association considers environmental matters, covering as well, as matters arise, climate-related issues aligned with the Paris Agreement goals. Sacyr is a member of SEOPAN's board of directors, which is the Association's governing and representative body, in accordance with the provisions and directives of the General Assembly. SACYR is one of the few members that have a Climate Change strategy in place since the end of 2020 with a clear rationale and focus on this topic. With its board position, Sacyr aims to influence the association and its members in order to improve their performance on climate-related matters, bringing awareness to all of them.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

0

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (Spanish Green Growth Group: group that aims collaboration between companies and governments to create an efficient roadmap for a low-carbon economy)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

Akin to the European Green Growth Group, the Spanish Group was created at a national level representing a wide range of sectors in order to gather different perspectives aiming to set a bilateral ongoing conversation between the government and private companies. The main purpose is to collect inputs on how to fight against climate change, support EU decarbonization policies, and evolve the economy into a more sustainable one. Sacyr, as a member company of the Spanish Green Growth Group, launched at COP26 the "Twelve keys for businesses on the path to decarbonization", a best practice guide to turn net zero emissions targets into climate action plans. In the past, the company participated as well in the publication "34 Examples of Green Economy", which reflects the change towards the sustainability of companies and the boosting of society as a whole. The project presented by Sacyr Water "Sustainable desalination for green growth" presented how the contribution of non-conventional resources, such as desalination, performed in a sustainable manner, may mitigate the effects of climate change on water storage. The technological advances also enable energy optimization of the process, minimizing the CO2 emissions, reducing costs and increasing our competitiveness.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

0

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (ASELIP)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We publicly promote their current position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The "Asociación de Empresas de Limpieza Pública y Cuidado del Medio Ambiente Urbano" (ASELIP) is the national Sectorial Association that represents the Urban Sanitation companies, understood as the activities of street cleaning, collection, transport, treatment and disposal, of urban solid waste. ASELIP not only looks after the groups it represents, but also ensures compliance with all current regulations on waste disposal and recycling, among others. Its maxim is to care for and protect the environment in order to substantially improve the environment for citizens. Through our active participation in the organization, we have, among other actions, sent a letter to the General Directorate of Environmental Quality and Assessment of MITECO (Spanish Ministry) exposing the problems arising from Royal Decree 533/2020 and the solutions we proposed. Additionally, we have participated in the consultation on the revision of the Directive 2010/31/EU on energy performance of buildings, eventually releasing a final document resulting from the consensus reached on the various issues consulted.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

0

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

## C12.3c

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**(C12.3c) Provide details of the funding you provided to other organizations in the reporting year whose activities could influence policy, law, or regulation that may impact the climate.**

**Type of organization**

Other, please specify (Climate Change Cluster)

**State the organization to which you provided funding**

Foretica

**Funding figure your organization provided to this organization in the reporting year (currency as selected in C0.4)**

5493.4

**Describe the aim of this funding and how it could influence policy, law or regulation that may impact the climate**

Forética is Spain's sole representative on the WBCSD (World Business Council for Sustainable Development). This brings businesses together to serve as a meeting point for fostering leadership and knowledge in sustainability aspects, ideas exchange and climate change discussions that can lead to a unified response to policy makers. In order to be a member, an organization must have a climate change strategy pathway, regularly publish performance indicators, and appoint a long-standing intermediary at departmental management or executive level. SACYR is a member of the cluster and actively participates in meetings and activities towards enhancing climate action. By sharing experience and good practices, SACYR attempts to influence other companies in their climate maturity pathway. As an example, during 2021 we presented the positioning document published by Forética in the framework of the Circular Economy Action Group, with a series of recommendations to accelerate business action towards a more circular Spain in 2030, articulated under three key axes: improving governance, accelerating action and boosting impact partnerships. The document was presented at the IV Circular Economy Business Forum organized by Forética in the framework of the Circular Economy Action Group, where the main trends in circular economy at European level were addressed, with the intervention of the Team Leader of Circular Economy of the Directorate General for the Environment from the European Commission, and at national level, with the intervention of the Ministry for Ecological Transition and the Demographic Challenge. Additionally, Sacyr has recently joined the Nature Business Ambition initiative, a business initiative promoted by Forética in Spain to drive ambition, promote action and build alliances to contribute to the recovery of nature and biodiversity as key axes to achieve a "Nature-positive" planet by 2030.

**Have you evaluated whether this funding is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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## C12.4

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**(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

**Publication**

In mainstream reports, incorporating the TCFD recommendations

**Status**

Complete

**Attach the document**

Sacyr Sustainability Report 1-5.pdf

Sacyr Sustainability Report 5-5.pdf

Sacyr Sustainability Report 2-5.pdf

Sacyr Sustainability Report 4-5.pdf

Sacyr Sustainability Report 3-5.pdf

**Page/Section reference**

The annual report includes information relevant to the company's response to climate change. This can be found on pages 20, 156-176. For the first time this year we are including on Annex 2 (page 321) a mapping table in order to clearly find the information according to each one of the TCFD recommendations.

**Content elements**

Governance

Strategy

Risks & opportunities

Emissions figures

Emission targets

Other metrics

Other, please specify

**Comment**

Sacyr's Integrated Report is publicly available at: [https://www.sacyr.com/documents/63048160/198771338/informe\\_integrado\\_2021-web.pdf/e411fd86-f1d6-5f30-76b5-7dff814fb48c?1.3](https://www.sacyr.com/documents/63048160/198771338/informe_integrado_2021-web.pdf/e411fd86-f1d6-5f30-76b5-7dff814fb48c?1.3)

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## C15. Biodiversity

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### C15.1

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**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	Yes, both board-level oversight and executive management-level responsibility	Sacyr has several objectives at a corporate level relating to biodiversity that are overseen at management-level through the Biodiversity Policy (approved by the Board of Directors in 2020) alignment performance review. This entail: a) Integrate biodiversity and natural capital conservation into the Group's strategy by being a prominent element in decision-making, in the bidding, execution and operation phases of projects, and by establishing objectives that guarantee the responsible management of natural capital. b) To conserve and make sustainable use of biological diversity and natural capital. c) Protect species and habitats, both those that are threatened and those of high biodiversity value, by adopting preventive, minimizing and enhancement measures. d) Promote the compensation of impacts generated by activities on biodiversity and, especially, on habitats and protected species. e) Encourage the training of employees and collaborators in responsible practices with respect to terrestrial ecosystems and biodiversity. f) Promote knowledge and awareness of biodiversity issues, collaborating with local communities, recovery centers, research centers, administrations and other interested parties, in order to conserve and protect biodiversity. g) Promote the enhancement of biodiversity and awareness of the actions that Sacyr carries for its conservation and protection.	<Not Applicable>

**C15.2**

**(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?**

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	Yes, we have made public commitments and publicly endorsed initiatives related to biodiversity	Commitment to respect legally designated protected areas Commitment to avoidance of negative impacts on threatened and protected species	SDG Other, please specify (Pacto por la Biodiversidad, Race to Zero, Forest Stewardship Council. )

**C15.3**

**(C15.3) Does your organization assess the impact of its value chain on biodiversity?**

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	Yes, we assess impacts on biodiversity in both our upstream and downstream value chain	<Not Applicable>

**C15.4**

**(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity-related commitments
Row 1	Yes, we are taking actions to progress our biodiversity-related commitments	Land/water protection Land/water management Species management Education & awareness Other, please specify (• Analyze midterm risks and dependencies on natural capital, monitoring protected areas through cameras to identify, rescue and relocate species, creation of nurseries for protected species, deployment of water drones to monitor marine species)

**C15.5**

**(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	Yes, we use indicators	State and benefit indicators Response indicators Other, please specify (Operation centers located within or close perimeter by protected zones, protected zones affected by operations, endangered species located in zones affected by operations, hectares of restored habitats)

**C15.6**

**(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
In mainstream financial reports	Content of biodiversity-related policies or commitments Governance Impacts on biodiversity Details on biodiversity indicators Risks and opportunities Biodiversity strategy	Sacyr is aware of the impact the business has on biodiversity and dedicates an important sector to the topic in the annual report. Consult pg 196-217 for further detail. Report type also includes voluntary sustainability report and communications.

**C16. Signoff**

**C-FI**

**(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

N/A

**C16.1**

**(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.**

	Job title	Corresponding job category
Row 1	COO of Sacyr, General Corporate Manager	Chief Operating Officer (COO)

**SC. Supply chain module**

**SC0.0**

**(SC0.0) If you would like to do so, please provide a separate introduction to this module.**

**SC0.1**

**(SC0.1) What is your company's annual revenue for the stated reporting period?**

	Annual Revenue
Row 1	4675366000

**SC1.1**

**(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.**

**Requesting member**

Cellnex Telecom SA

**Scope of emissions**

Scope 1

**Allocation level**

Facility

**Allocation level detail**

Two small maintenance and cleaning contracts for the offices in C/ Juan Esplandiú (Madrid)

**Emissions in metric tonnes of CO2e**

0

**Uncertainty (±%)**

0

**Major sources of emissions**

**Verified**

Yes

**Allocation method**

Allocation not necessary due to type of primary data available

**Market value or quantity of goods/services supplied to the requesting member****Unit for market value or quantity of goods/services supplied**

Please select

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Considering the type of services provided to Cellnex Telecom as well as the conditions defined in the contracts, Sacyr does not have any direct consumption associated with the development of the activities.

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**Requesting member**

Cellnex Telecom SA

**Scope of emissions**

Scope 2

**Allocation level**

Facility

**Allocation level detail**

Two small maintenance and cleaning contracts for the offices in C/ Juan Esplandiú (Madrid).

**Emissions in metric tonnes of CO<sub>2</sub>e**

0

**Uncertainty (±%)**

0

**Major sources of emissions****Verified**

Yes

**Allocation method**

Allocation not necessary due to type of primary data available

**Market value or quantity of goods/services supplied to the requesting member****Unit for market value or quantity of goods/services supplied**

Please select

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Considering the type of services provided to Cellnex Telecom as well as the conditions defined in the contracts, Sacyr does not have any direct consumption associated with the development of these activities

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**Requesting member**

Naturgy Energy Group SA

**Scope of emissions**

Scope 1

**Allocation level**

Facility

**Allocation level detail**

UTE Picón, Photovoltaic solar plant with single-axis trackers, including booster substation and 3km HVL. Scope Full EPC

**Emissions in metric tonnes of CO<sub>2</sub>e**

11.4

**Uncertainty (±%)**

0

**Major sources of emissions**

Fuel consumption in vehicles

**Verified**

Yes

**Allocation method**

Allocation not necessary due to type of primary data available

**Market value or quantity of goods/services supplied to the requesting member****Unit for market value or quantity of goods/services supplied**

Please select

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Fuel consumption in vehicles monitored thanks to Sacyr's environmental management system

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**Requesting member**

Naturgy Energy Group SA

**Scope of emissions**

Scope 2

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**Allocation level**

Facility

**Allocation level detail**

UTE Picón, Photovoltaic solar plant with single-axis trackers, including booster substation and 3km HVL. Scope Full EPC

**Emissions in metric tonnes of CO2e**

0

**Uncertainty (±%)**

0

**Major sources of emissions****Verified**

Yes

**Allocation method**

Allocation not necessary due to type of primary data available

**Market value or quantity of goods/services supplied to the requesting member****Unit for market value or quantity of goods/services supplied**

Please select

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

N/A

**SC1.2****(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).**

Since Sacyr's carbon footprint (scope 1 and scope 2) associated with the services provided to Cellnex Telecom is 0, it is unnecessary to provide references for the data used.

Sacyr's carbon footprint (scope 1 and scope 2) associated with the services provided to Naturgy is part of the GHG Inventory, Integrated Sustainability Report 2021.

**SC1.3****(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?**

Allocation challenges	Please explain what would help you overcome these challenges
Customer base is too large and diverse to accurately track emissions to the customer level	Deepening in the knowledge of our diverse processes and having a better understanding of our scope 3 are crucial to allocate our emissions to our customers.

**SC1.4****(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?**

Yes

**SC1.4a****(SC1.4a) Describe how you plan to develop your capabilities.**

The plan to allocate the emissions to our clients is based on the identification of the consumption of the raw material and the generated waste associated to the different centers, establishing the relationship between the different centers and the clients associated to them.

**SC2.1**

(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.

**Requesting member**

Cellnex Telecom SA

**Group type of project**

Relationship sustainability assessment

**Type of project**

Assessing products or services life cycle footprint to identify efficiencies

**Emissions targeted**

Actions to reduce customers' operational emissions (customer scope 1 & 2)

**Estimated timeframe for carbon reductions to be realized**

0-1 year

**Estimated lifetime CO2e savings**

0

**Estimated payback**

1-3 years

**Details of proposal**

The project could address the following phases: - A proposal with a package of energy-saving measures for the customer's facilities on which Sacyr performs maintenance operations - The review of the maintenance plan to reinforce preventive maintenance operations

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**Requesting member**

Naturgy Energy Group SA

**Group type of project**

Relationship sustainability assessment

**Type of project**

Assessing products or services life cycle footprint to identify efficiencies

**Emissions targeted**

Actions to reduce customers' operational emissions (customer scope 1 & 2)

**Estimated timeframe for carbon reductions to be realized**

0-1 year

**Estimated lifetime CO2e savings**

0

**Estimated payback**

1-3 years

**Details of proposal**

The project could address the following phases: - A proposal with a package of energy-saving measures for the customer's facilities on which Sacyr performs maintenance operations - The review of the maintenance plan to reinforce preventive maintenance operations

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## SC2.2

(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?

No

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## SC4.1

(SC4.1) Are you providing product level data for your organization's goods or services?

No, I am not providing data

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## Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

---

## The European Climate Pact Submission

Please indicate your consent for CDP to showcase your disclosed environmental actions on the European Climate Pact website as pledges to the Pact.

Yes, we wish to pledge to the European Climate Pact through our CDP disclosure

**Please confirm below**

I have read and accept the applicable Terms