

TAX COMPLIANCE POLICY

1. Why is a Tax Compliance Policy created?

The Técnicas Reunidas Group, understood as the company Técnicas Reunidas, S.A. (the "Company") and all the subsidiaries of the group of which it is the parent entity (the "Group"), aims for full compliance with the regulatory standards established for listed companies, considered as maximum regulation, given that the Group is committed to ethical management, which is manifested in the decision to apply the highest standards of good governance. Thus, the Tax Compliance Policy was approved by the Company's Board of Directors in December 2023.

2. What is the purpose of the Tax Compliance Policy?

The purpose of this Tax Compliance Policy is to establish the principles, criteria, and mechanisms of the Tax Compliance Management System (TCMS), to fully comply with the tax obligations established by law, as well as the recommendations established in the Code of Good Tax Practices of the Tax Agency and UNE 19602 Standard. To this end, the regulations and recommendations have been adapted as far as possible to the particular characteristics of the Group.

To duly comply with the cited regulations, a series of measures are foreseen to establish an adequate procedure for the control and management of tax risks in the adoption of decisions affecting the Group's tax strategy approved by the Board of Directors.

3. To whom is the Tax Compliance Policy addressed?

The Tax Compliance Policy is addressed to all directors and all employees and executives of entities that are part of the Group whose functions may impact taxation. Its knowledge and application are mandatory for all members of the Group.

This Policy will apply to Técnicas Reunidas and its Group, although, due to its defining nature of general principles of action, it extends to all companies that make up the Técnicas Reunidas Group.

Additionally, the Company will also promote, as far as possible, the application of the principles of this Policy concerning the subsidiaries and, where appropriate and possible, concerning temporary business unions, joint ventures, and other equivalent associations, whether national or foreign.

This Policy will apply to all taxes managed directly or indirectly by Técnicas Reunidas, including but not limited to:

- Taxes on profits
- Indirect taxes charged to customers
- Indirect taxes paid to suppliers and subcontractors
- Customs duties
- Withholdings applicable to remuneration payments
- Management of taxes on behalf of clients
- Indirect taxes where the Group pays certain amounts without being the taxpayer

4. What are the principles of action in tax compliance on which the TCMS is based?

The Group is committed to a responsible and sustainable tax model, emphasizing the following principles in its Sustainability Policy:

- Compliance with current tax legislation in all territories where it operates.
- Adoption of tax decisions based on a reasonable interpretation of the applicable regulations.
- Avoiding the establishment or acquisition of companies' resident in tax havens, unless necessary for participation in a tender or the execution of a project in that same tax haven.
- Avoiding the use of opaque or artificial tax or corporate structures.
- Developing a relationship with tax authorities based on respect for the law, trust, good faith, professionalism, collaboration, loyalty, and reciprocity, without prejudice to legitimate disputes that, respecting the above principles and in defense of social interest, may arise with these authorities regarding the interpretation or application of the rules.

To articulate how the Group can duly comply with this requirement, the following guiding principles of the tax strategy are included:

- **Consistency and transparency.**

The Group's tax strategy must be consistent, meaning it is intended to be permanent. That is, as long as the rules and criteria applicable to the Group's operational activities are not significantly altered, the tax strategy, as well as the principles and procedures contained in this Tax Compliance Policy, should not be substantially modified.

On the other hand, the Group's tax strategy must be transparent and, therefore, must be communicated to all members of the organization as a whole.

- **Compliance with tax obligations.**

The Group will maintain a conservative tax position based on compliance with current legality and applicable doctrinal and jurisprudential criteria, both in Spain and in other countries where it operates, aimed at obtaining maximum legal certainty in the development of the Group's activity.

Aggressive tax planning will not be conducted, especially in matters that impact the Group's main activity. Likewise, the erosion of the taxable base of Spanish companies will not be conducted to fully respect the international tax standards issued by the OECD, nor, as a rule, will branches or subsidiaries be established in territories considered tax havens.

- **Informed and fiscally responsible decision-making.**

In cases where the interpretation of the rule is particularly complex, where the amount of potential risk is particularly high, or where, in general, it is advisable to minimize conflicts arising from the interpretation of the tax rule, the Group will rely on external advisors.

- **Proactive action against tax risks.**

The Group manages tax risk through reasonable interpretation and compliance with tax regulations, thus avoiding, as far as possible, questioning by the tax administration of the correct application of the tax law. In particular, standardized procedures for action in the tax field must be established so that any member of the Group who detects a tax risk, whether potential or materialized, has, and knows the channels for reporting such risks.

Furthermore, tax returns must be filed within the deadlines established by the applicable regulations.

- **Cooperative Relationship with Tax Authorities.**

Notwithstanding any reasonable discrepancies that may arise with the tax authorities in the interpretation of tax regulations, the Group will strive to maintain a relationship based on the principles of good faith and collaboration with the authorities at the national, regional, or local level.

- **Prohibition of willful commission of tax offenses.**

As a fundamental principle, the willful commission of any tax offense is prohibited. All Group employees, especially those involved in tax decision-making, will take all necessary measures to avoid committing tax offenses.

5. Are there consequences for potential non-compliance with the TCMS policies and procedures?

All employees of the Group are obliged to comply with the principles and criteria established in this Tax Compliance Policy, within the scope of the functions corresponding to the position they hold within the Group.

Failure to perform these functions will result in appropriate disciplinary actions which, depending on the circumstances, may even lead to the termination of the contract.

Additionally, sanctions may be imposed in accordance with the internal regulations of TR or the affected group company that applies in each case.

Furthermore, efforts will be made to ensure that key individuals in the management and detection of tax risks are provided with incentives based on their level of compliance.

6. Is there an Internal Information System to report non-compliance with the TCMS?

The Company has an Internal Information System through which any employee, business partner, or any interested party can report any non-compliance or suspicion of tax non-compliance, all in accordance with the provisions of the Internal Information System Policy and its development regulations.

7. Are there means assigned to disseminate and communicate the content of this Policy?

It is the responsibility of the Company's Board of Directors to promote the effective dissemination of the Tax Compliance Policy and to inform employees, shareholders, or any interested party, as well as any agreed modifications. This Tax Compliance Policy is accessible to all stakeholders.

Additionally, it is the responsibility of the Management Committee to internally communicate the importance of following the Tax Compliance Policy by the entire Group and the third parties with whom it interacts.

8. Are there implementation guidelines?

The Company will implement control mechanisms and provide the necessary resources for the effective compliance with tax regulations and the corporate tax policy determined by the Board of Directors, ensuring that all individuals involved in tax practice have sufficient technical training proportional to their level of responsibility.