

WORKING TIME AND WORK–LIFE BALANCE FRAMEWORK POLICY

The Board of Directors of Sacyr, S.A. ("**Sacyr**"), in the exercise of its general and non-delegable authority to determine the company's overall policies and strategies, and following review and proposal by the relevant Committee, has approved this *Working Time and Work-Life Balance Framework Policy* (hereinafter, the "**Policy**").

1. Purpose

The purpose of this *Policy* is to establish the common principles governing the organization of working time and the reconciliation of personal, family, and professional life at Sacyr, to ensure working conditions that respect internationally recognized human and labor rights.

This *Policy* constitutes a global framework that must be further developed and adapted in each country, always respecting local regulations, applicable collective bargaining agreements, and agreements reached with employee representatives.

2. Scope of Application

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

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

3. International Framework

Sacyr takes as reference, among others, the following international instruments on human rights, working time, work-life balance, and working conditions, without prejudice to compliance with the regulations applicable in each country:

- International Labor Organization (ILO) Conventions on working hours and work-life balance.
- The International Covenant on Economic, Social and Cultural Rights (ICESCR), which recognizes the right to rest and leisure, reasonable limitations on working hours.
- The United Nations Guiding Principles on Business and Human Rights, particularly those related to labor standards and decent work.

- European Union regulations and standards on working conditions and work-life balance.

These standards provide a framework for adopting responsible practices related to working time and work-life balance, aligning them with the regulations of each country and promoting their full integration into the Group's global people-management procedures and policies.

4. General Principles

At Sacyr, we promote a work organization that fosters employee well-being, respects labor rights, and supports the reconciliation of personal, family, and professional life in all countries where we operate.

Sacyr considers the talent and dedication of its people a fundamental strategic asset. The trust we place in our teams, together with their effectiveness and commitment, drives our success and enables us to advance toward fulfilling our purpose, mission, and corporate values, and contributes to improved business performance. Therefore, we foster a work environment that supports a healthy balance between personal and professional life.

In line with the above, Sacyr is committed to the following general principles regarding working time and work-life balance:

- Compliance with labor laws, as well as applicable collective bargaining agreements and arrangements in each country.
- Explicit rejection of forced labor, excessive working hours, and all forms of labor exploitation.
- Respect for the right to reasonable working hours, rest periods, leisure time, and paid annual leave.
- Establishment of work organization systems that respect, at a minimum, maximum working hours, overtime limitations, night work restrictions, and daily and weekly rest periods as required by local regulations and collective agreements.
- Facilitating access to legally mandated leave and work-life balance measures under applicable collective bargaining agreements, ensuring employees are properly informed, that these measures are well-managed, and guaranteeing that utilizing these measures will not result in any adverse employment consequences.
- Assessment and, where feasible, provision of reasonable flexibility in work schedules, ensuring operational needs are met and service quality is maintained, in response to appropriately justified personal or family needs.

- Promotion of a culture of respect and social dialogue with employee representatives, ensuring that work organization responds in a balanced way to both the operational needs of the company and the needs of its personnel.

Each country will establish procedures and general guidelines governing working hours and leave related to work-life balance, ensuring they comply with local regulations and the provisions of this *Policy*.

This *Working Time and Work-Life Balance Framework Policy* was approved by the Board of Directors of Sacyr, S.A. on December 20, 2021, amended on December 22, 2022, and revised on December 18, 2025.