

FRAMEWORK POLICY GOVERNING WORKING HOURS AND A WORK/LIFE BALANCE

In accordance with its general and non-transferable authority to determine the general policies and strategies of the company, and following the relevant review and proposals by the competent committee, the Board of Directors of Sacyr, S.A. ("Sacyr") has approved this Framework Policy on Working Hours and a Work-Life Balance (hereinafter the "Policy").

1. Purpose

The purpose of this Policy is to set out comprehensively the general principles and guidelines as regards working hours governed by the labor relations established within Sacyr and the members of its business Group, notwithstanding any adaptations and adjustments required by the applicable legislation of each country, in order to define a global framework for working hours and a work/life balance, which is part of the human resources management model that facilitates the recruitment, promotion, and retention of talent.

This Policy consolidates the different corporate instruments that make up the internal regulations on working hours, setting out the basic principles of action in this area. These instruments are:

- Flex Working Policy.
- Digital disconnection procedure.
- Procedure to promote a work/life balance.

2. Scope of application

This Policy applies to Sacyr and to all the companies in its Group. For purposes of this Policy, the SACYR Group is to be understood to comprise (i) all subsidiary or majority-owned companies effectively controlled by Sacyr, S.A. directly or indirectly, irrespective of their geographical location and (ii) the Fundación Sacyr [Sacyr Foundation]. Therefore, all mentions of the Sacyr Group contained in this Policy are to be understood to refer to all the above companies and the Foundation.

It does not apply to subsidiaries or companies in which a minority interest is held that are not effectively controlled by Sacyr directly or indirectly. These will have their own tax policies approved by their own competent bodies. Sacyr will encourage investee companies that are not part of the Group, particularly Sacyr's tax consolidation group, to implement similar reporting procedures.

3. Objectives

Sacyr views the talent of its human team as a strategic asset and supports its staff in the search for personal and professional balance, fostering a flexible working environment, with respect to working hours and making reasonable and responsible use of technological tools, which has been realized through the company's Flex Working policy and digital disconnection procedure.



The approach taken to people management is based on goals and results, pursuing productivity and efficiency in all activities, based on trust, efficiency, productivity, and merit, allowing employees, as far as possible, to manage their working time so that a good balance can be achieved between work, family, and personal life.

4. Basic principles of action

In order to achieve the objectives of this Policy, Sacyr pursues and promotes the following basic principles:

4.1. Working hours

Sacyr declares its commitment to ensure that employees do not work overtime and that the minimum rest breaks established in the regulations of each country are respected unless specific exceptions are permitted for justified organizational and productive reasons.

Maximum working hours, rest periods between working days, and paid leave to ensure a good work-life balance are recognized as a right, but not as an obligation. This means, among other things, that working overtime, outside ordinary working hours, is not prohibited, but employees have the right not to exceed their maximum working hours. This Company is committed not to exceed maximum working hours and to comply with minimum rest periods between working days.

In each country, the guidelines to be followed as a general rule in relation to working hours should be established in accordance with applicable labor legislation.

In the case of Spain, and notwithstanding the specifications contained in each Collective Agreement, the following guidelines should be implemented as a general rule, unless service provision and business requirements necessitate a different distribution, in which case, the corresponding compensation mechanisms are established so that the annual number of working days is not exceeded:

- Working week: 40 hours on average, calculated annually.
- Working day: 9 hours
- Minimum rest period between working days: 12 hours
- Minimum rest periods during a working day: 15 minutes for working days in excess of 6 hours.
- Minimum weekly rest: 1 and a half days, cumulative for periods up to 14 days.

4.2. Personal leave

Sacyr is also committed to enabling all employees to take paid leave for personal and family reasons. To this end, the company has established a procedure governing personal leave for Sacyr's central offices in Spain in the development of this Policy, which should serve as a guide for implementation elsewhere in the company, adapting it in accordance with any specifications contained in the applicable Collective Agreement, as well as in other countries according to the specific regulations of each of them.

This *Framework Policy on Working Hours and a Work/Life Balance* was approved by the Board of Directors of Sacyr on December 20, 2021 and was last modified on December 22, 2022.