

Human rights and Labour conditions Policy





1

INTRODUCTION AND
OBJECTIVE

2

SCOPE OF APPLICATION

3

LABOR AND HUMAN
RIGHTS PRINCIPLES

4

COMMITMENTS

5

COMMUNICATION AND
TRANSPARENCY

6

APPROVAL AND UPDATES

1. Introduction and objective

The Sener Group is firmly committed to the protection and respect of internationally recognized human rights, considering these principles fundamental to ethical, responsible, and sustainable business management. This policy is inspired by the main international frameworks on the subject, including the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) fundamental conventions, the United Nations Global Compact, and the Universal Declaration of Human Rights.

The purpose of this Human rights and Labour conditions Policy is to establish the reference framework guiding Sener's actions in these areas, promoting their integration into corporate culture, decision-making processes, and daily operations. This Policy serves as a framework document and is complemented by specific policies and codes of conduct developed in accordance with local laws or requirements in the countries where Sener operates, always in alignment with the general guidelines defined here.

Through this policy, Sener reinforces its commitment to decent work, the protection of fundamental rights, and the promotion of constructive social dialogue as the foundation for a cohesive, innovative, and socially responsible organization.

2. Scope of application

The scope of this Policy covers Sener Grupo de Ingeniería, S.A. and its subsidiaries (hereinafter "Sener Group" or "the Group"). Compliance with this Policy is mandatory for all directors, managers, and employees of the Sener Group, and extends to vendors, business partners, and other third parties with whom contractual relationships are maintained, as established in the corresponding agreements. In this way, the adoption of principles and practices aligned with this policy is promoted throughout the entire value chain, including upstream and downstream phases.

Additionally, individuals acting as Sener representatives in companies or entities outside the Group, or in those where Sener does not exercise effective control, must actively promote, as far as possible, the adoption of principles aligned with those established in this Policy.

No exclusions are contemplated, except those duly justified by material irrelevance.

3. Labor and human rights principles

3.1 Employment

- **Prohibition of child labor, forced or coerced labor, modern slavery, or human trafficking.**

The Sener Group ensures compliance with ILO provisions regarding the protection of minors' rights and the eradication of all forms of labor exploitation. No child labor, forced or coerced labor, modern slavery, or human trafficking is tolerated.

- **Freedom of association, right to collective bargaining, and worker representation**

The Sener Group respects and guarantees the individual right of all its workers to freedom of association and collective bargaining, without suffering any retaliation or discrimination. The role of worker representatives as legitimate interlocutors is recognized, and an environment of open, transparent, and constructive dialogue is promoted, in line with ILO Conventions 87 and 98.

Furthermore, the Group is committed to maintaining coverage of workers under existing collective agreements in Spain and their equivalents in other countries, as a guarantee of labor protection, fairness, and participation.

3.2 Working conditions

- **Respect for individuals and zero tolerance for harassment**

The Sener Group rejects any form of physical, psychological, moral harassment, or abuse of authority, as well as any other conduct that may create an intimidating, offensive, or rights-violating environment. All members of the Sener Group must act with respect toward colleagues in the workplace, regardless of hierarchical level, fostering a pleasant, healthy, and safe working environment. The same respectful treatment and consideration apply to clients, partners, subcontractors, suppliers, advisors, and any other individuals with whom professional relationships are maintained, ensuring these interactions are always based on collaboration.

- **Non-discrimination and equal opportunity**

The Sener Group upholds and ensures compliance with the principle of equal opportunity among individuals. Special attention is given to providing equal treatment and opportunities to men and women in selection, training and development, internal promotion, working conditions and employment, occupational health, and work-life organization. The Sener Group also does not tolerate any discrimination based on race, color, nationality, age, gender, religion, social origin, disability, or other factors unrelated to professional performance.

Individuals in management or leadership positions must facilitate environments of equal opportunity and non-discrimination.

- **Diversity and inclusion**

For the Sener Group, diversity and inclusion, in all their dimensions, are fundamental both for the well-being of the business and its people. Therefore, a diverse and inclusive culture is promoted through awareness, training, and communication initiatives.

- **Healthy and safe work environment**

The Sener Group is firmly committed to excellence in occupational health and safety, adopting and maintaining the necessary tools, processes, and preventive measures to ensure the safety and health of individuals in the performance of their professional activities.

The Group's goal is to prevent all workplace accidents. To achieve this, demanding objectives, rigorous procedures, and safe working conditions are established, which are continuously evaluated, reviewed, and improved. All members of the Sener Group must share this goal, embrace these objectives, and know and comply with health and safety regulations at work, proactively safeguarding their own well-being as well as that of colleagues, clients, vendors, collaborators, and anyone else who could be affected by their professional activities.

- **Physical, mental, and emotional well-being**

The well-being of individuals is a priority for the Group; therefore, it is committed to creating healthy work environments and promoting support programs that foster the physical and psychological health of workers.

- **Working hours, rest, and work-life balance**

The Sener Group is committed to complying with applicable legislation and sector regulations regarding weekly working hours and rest periods for employees. Additionally, as a family-friendly company, it promotes measures that facilitate work-life balance, encouraging shared responsibility and flexibility.

- **Fair remuneration and benefits**

The Group guarantees fair, adequate, and non-discriminatory compensation, in accordance with applicable law and the principle of equal pay for work of equal value. The right to a decent wage, appropriate to each individual's education, experience, responsibilities, and functions, is recognized, and active efforts are made to eliminate any unjustified pay gaps, especially those based on gender.

- **Professional development and continuous training**

The Sener Group invests in the development of internal talent, promoting continuous training, internal mobility, and knowledge management. In an effort to integrate and retain highly skilled professionals, internal promotion is valued, and training plans are established to support employees' professional growth.

- **Social dialogue**

The Sener Group considers social dialogue a key element in developing labor relations based on trust, mutual respect, and active participation. This approach allows workplace challenges to be addressed collaboratively, contributing to a more cohesive, transparent, and sustainable organizational culture.

Formal and informal consultation channels are established, and a culture of active listening is promoted through tools such as internal surveys, communication channels, and participatory sessions. The information gathered through these mechanisms is used to identify opportunities for improvement and to design actions that respond to the real needs of the workforce. The results of social dialogue are integrated, when appropriate, into the Group's strategic decision-making processes.

The Sener Group recognizes the importance of involving relevant stakeholders—including employees, their representatives, business partners, and collaborating entities—in building a participatory work environment and in decision-making aligned with the Group's values.

- **Personal data privacy**

The Sener Group complies with current legislation on the protection of personal data, ensuring its confidentiality, integrity, and legitimate use. This protection extends to clients, vendors, collaborators, candidates in selection processes, and individuals who are part of the Sener Group itself. Exceptions to this rule are made only when legally required and/or in compliance with judicial or administrative rulings.

- **Commitment to the environment in the workplace**

The Sener Group integrates respect for and concern about environmental protection and sustainable development into all its activities, committing to carry out its operations and projects with these aspects in mind and applying the necessary resources to prevent negative impacts and actively contribute to sustainable development, as stated in its Code of Conduct.

4. Commitments regarding human rights and labor conditions

The Sener Group assumes the following commitments regarding human rights, labor conditions, and social dialogue as part of its corporate responsibility and its purpose of contributing to a fairer, more equitable, and sustainable society.

- **Promote a culture of respect, inclusion, and participation**, fostering workplaces free from discrimination and harassment.
 - Carry out at least one awareness-raising or training action per year on these topics.

- **Ensure the protection of human rights in all operations and business relationships**, applying due diligence mechanisms to prevent, mitigate, and remedy negative impacts.
 - Maintain zero confirmed cases of child labor, forced labor, or discrimination in the Group's operations and throughout the supply chain.
- **Ensure pay equity through annual salary reviews** that eliminate unjustified gaps based on gender or other factors.
 - Progressively reduce the pay gap in line with the objectives established in the Group's sustainability strategy.
- **Promote the health and well-being of the Group's employees**.
 - Carry out actions that foster the overall well-being of the Group's employees.

5. Communication and transparency

This policy is published on the Sener Group corporate website and communicated through internal and external channels. It is available to all relevant stakeholders and incorporated into staff training and awareness programs. The policy is reviewed and updated periodically, and progress is reported in the company's sustainability reports.

6. Approval and updates

The Sener Board of Directors is responsible for approving this Human rights and Labour conditions Policy within its oversight and corporate policy and strategy approval functions. This approval reinforces the institutional commitment to sustainability and the ethical management of people as strategic pillars of the Group.

The Board will also oversee proper implementation, with operational management led by People Department in coordination with the Sustainability Department. Both departments are responsible for coordinating its application, monitoring its effectiveness, evaluating its impact, and proposing improvements when necessary. The policy will be reviewed and updated periodically to ensure its relevance, applicability, and alignment with regulatory, social, environmental, and governance changes, as well as with the company's specific situation. Any substantial modifications will be submitted again for approval by the Board of Directors.

This policy was approved by the Sener Board of Directors on December 18, 2025, and is effective as of that date.



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