

**PL14.1\_5**

**DIGITAL DISCONNECTION POLICY**

## REGISTER OF CHANGES

Edition	Date	Section	Page	Description of the change
01	04/12/2025			Initial Edition

## LIST OF INTERNAL DISTRIBUTION

Personnel/Position	Date	Shared by
All SUARDIAZ Group personnel	04/12/2025	Email and SharePoint. Published on SUARDIAZ Group website.

☒ Controlled Copy  
☐ Uncontrolled Copy

### ALL RIGHTS RESERVED

**SUARDIAZ Group** owns the original of this document. Any copies provided are confidential and may not be used for purposes other than those for which they are requested, nor may they be reproduced without the authorization of **SUARDIAZ Group**. Any person, other than those authorized, who finds this document shall return it to: C/ de Ayala, 6, 28001 Madrid, or through the contact form available on the website: [www.suardiaz.com](http://www.suardiaz.com).

	<b>DIGITAL DISCONNECTION POLICY</b>	<b>PL14.1_5</b>
		<b>Edition 01</b>
		<b>04/12/2025</b>

In accordance with the provisions set forth in Article 20.bis of the Workers' Statute and Article 88.3 of Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the guarantee of digital rights, below is the Corporate Digital Disconnection Policy of SUARDIAZ Group – Grupo Logístico Suardiaz, S.L. and its subsidiary companies – which shall be governed by the following:

## **CLAUSES**

### **FIRST.- The right to digital disconnection.**

Being aware of the technological development of communications and of the need to find new balances not only with the right to reconcile work activity and personal and family life, but also with the possible distortions that permanent connectivity may cause in rest time, digital disconnection is considered a right, whose regulation contributes to the health of workers, allowing among other benefits the reduction of technological fatigue or stress, and improving with this regulation the working environment and the quality of work.

The Company shall guarantee workers the right to digital disconnection once the working day has ended.

In order to respect rest time and personal and family privacy, workers shall have the right not to respond to any work-related message/communication received through any means, outside their working time, except as provided in Clause Five below (*"Exceptions to the measures that guarantee digital disconnection"*).

Likewise, it is hereby stated that the Company shall comply with the provisions of Organic Law 3/2018, on the Protection of Personal Data and the guarantee of digital rights, as also stated in ANNEX II – Protocol on the Use and Control of the SUARDIAZ Group's IT Resources, established in the Action Protocol for the Purposes of Crime Control and Prevention and Anti-fraud of SUARDIAZ Group.

### **SECOND.- Use of IT Systems and Technological Resources Provided by the company.**

Employees commit to proper use of the computer and technological means made available by the Company, avoiding their use outside working hours. To this end, the following practices, among others, shall be encouraged among all staff:

- Indicating in electronic messaging and calendar tools whether one is available or absent.

	<b>DIGITAL DISCONNECTION POLICY</b>	<b>PL14.1_5</b>
		<b>Edition 01</b>
		<b>04/12/2025</b>

- When, for reasons of time zone differences or other causes, it is necessary to send non-urgent emails outside the recipient's working hours, it is recommended that the "*delay delivery*" option be used in the relevant messaging system, thereby scheduling the sending of the email so that it is received during working hours.

Employees with team management responsibilities must be particularly rigorous in the application of the digital disconnection policy, acting as an example for their teams.

### **THIRD.- Meetings.**

The scheduling of work meetings, in-person or remote, internal, or external, shall be arranged considering the availability and/or working hours of attending workers, avoiding extending their duration beyond the scheduled time and preventing any invasion of workers' rest time.

Exceptionally, and provided the circumstances set out in Clause Five below apply, this clause shall not be applicable.

### **FOURTH.- Rest periods.**

The Company shall guarantee workers the right to digital disconnection during their periods of rest consisting of vacations, weekly rest, or absences due to other reasons such as leave or temporary incapacity.

To this effect, workers shall activate an "*absent*" or "*out of office*" message in electronic messaging and calendar tools, indicating the dates of absence and the contact details of the replacement when possible.

### **FIFTH.- Exceptions to the measures that guarantee digital disconnection.**

Exceptional circumstances that may justify the non-application of the digital disconnection measures provided for in this agreement shall be those in which failure to attend/respond immediately could cause serious harm to the Company.

Considering the activity conducted by the Company, those workers who occupy on-call positions, or those who have agreed special availability, are excluded from the right to digital disconnection. Also excluded are those holding management or corporate responsibility functions.

	<b>DIGITAL DISCONNECTION POLICY</b>	PL14.1_5
		Edition 01
		04/12/2025

**SIXTH.- Guarantee of digital disconnection in on-site work and remote work.**

The Company shall guarantee compliance with this digital disconnection policy both for on-site work and remote work arrangements.

**SEVENTH.- Awareness of digital disconnection measures.**

Those who have responsibility over a team must set an example and promote among their collaborators the proper use of technological tools and compliance with measures intended to guarantee the right to digital disconnection.

**EIGHTH.- Validity and publication.**

This Policy was approved by the Board of Directors of SUARDIAZ Group at its meeting held on December 4, 2025, after hearing from the workers' representatives by the Corporate People and Talent Department.

Amendments to this Policy shall be approved by the Board of Directors of SUARDIAZ Group, following a non-binding proposal from the Corporate People and Talent Department.

This Policy shall be published both on the corporate website of SUARDIAZ Group and on the internal information and documentation system.