DISCONNECTION POLICY DIGITAL

Eiffage Metal España, SLU

EIFFAGE MÉTAL

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1. INTRODUCTION AND PURPOSE.

The General Data Protection Regulation (GDPR) came into force in May 2016 and is applicable from May 2018.

Adapting to the General Data Protection Regulation requires the development of a new organic law to replace the current one.

The purpose of ***Organic Law 3/2018, of December 5, on the Protection of Personal Data and the guarantee of digital rights (hereinafter LOPD GDD)*** is to adapt the legal system Spanish to Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, relating to the protection of natural persons with regard to the processing of their data personal data and the free movement of this data, and to complete its provisions.

The LOPD GDD includes in its article 88 the right to digital disconnection and imposes the obligation to develop a digital disconnection policy for entities.

In this sense, according to said law, digital disconnection implies that:

1. *Workers and public employees shall have the right to digital disconnection in order to guarantee, outside of legally or conventionally established working hours, respect for their rest time, leave and vacations, as well as their personal and family privacy.*

2. *The methods for exercising this right will take into account the nature and purpose of the relationship In the workplace, they will strengthen the right to reconcile work and personal life and family and will be subject to the provisions of the collective bargaining agreement or, failing that, to the agreed between the entity and the workers' representatives.*

3. The employer, after consulting with the workers' representatives, will develop a policy internal meeting aimed at workers, including those in management positions, in which they will define the ways in which the right to disconnect can be exercised and the training and other actions raising staff awareness about the reasonable use of technological tools to avoid the risk of digital fatigue. In particular, the right to digital disconnection will be preserved. in cases of total or partial remote work, as well as at home of the employee linked to the use of technological tools for work purposes.

This same legal obligation is included in Law 10/2021, of July 9, on remote work.

Therefore, and in compliance with current legislation, this document regulates the aforementioned obligation.

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This Policy complements and expands upon the general Data Protection Policy.

2. SCOPE.

This digital disconnection policy applies to all workers, agents and executives of the entity.

The persons acting as representatives of the Entity shall promote, to the extent that their competencies and responsibilities allow, the application of the principles and guidelines established in this Policy.

3. PRINCIPLES OF ACTION.

The business commitment we make to our professionals is based on a organizational culture based on flexibility, responsibility, respect and commitment mutual. A project that links the continuous improvement of the Entity and the increase in the quality of the professional and personal life of all of us who are part of it.

In this regard, the Principles that frame our actions in this matter are the following:

• Digital disconnection is a right and, therefore, not an obligation.
As a result, professionals will be able to make communications outside of working hours. with complete freedom, assuming that the recipient will be able to exercise their right to digital disconnection and, therefore, will not be obliged to respond until the start of his working day.

• We recognize, in any case, the right of workers to digital disconnection, in order to guarantee, outside of working time, respect for rest periods, leave and vacations, as well as their personal and family privacy.

• The right to digital disconnection will be accessible to all workers. This The law will consider the nature and purpose of the employment relationship and, through differentiation between effective working time and personal and rest time, will contribute to work-life balance of the professional and family life of the workers.

• The exercise of the right to digital disconnection will in no case imply the application of disciplinary measures will not be taken, nor will it have an impact on performance evaluations simply because to exercise that right.

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- The entity is committed to promoting awareness-raising actions at all levels of the organization, regarding the proper use of technologies that, in any case, avoid the risk of fatigue information technology, promoting awareness-raising actions / training aimed at all its professionals, in order to inform about the risks, challenges and best practices related to the use of digital tools.

4. MEASURES TO GUARANTEE THE EXERCISE OF THE RIGHT TO DISCONNECT.

- As a general rule, the sending of work-related communications through digital media between the end of one workday and the beginning of the next. In those cases in which, due to exceptional circumstances, communications are issued outside of said During the scheduled time, the sender must bear in mind that the receiver may exercise their right to digital disconnection and respond only within your working hours.

- The use of automated out-of-office messages available in the corporate messaging and email systems during holiday periods, incapacities, personal matters, days off, permits, leaves of absence, periods of sick leave or absence during working hours. In these types of automated messages during periods of absence, it is They will indicate the dates on which the employee will be unavailable and, where applicable, An alternative email address or contact person will be designated.

- The right to digital disconnection will be guaranteed to professionals who carry out their work remotely. in-person work as well as in cases of work outside the company's facilities Entity.

- The employees of the Entity will make appropriate use of the resources IT and technological resources made available to you, respecting working hours and established rest periods and avoiding, as far as possible, their use for work purposes outside of working hours

- The scheduling of work meetings, both internally and externally, as well as the Mandatory training will be carried out taking into account the approximate duration and, Preferably, they will not extend beyond the end of the ordinary working day.

- Where possible, the notices for the sessions indicated in the previous paragraph will be They will be carried out with sufficient advance notice to allow workers to plan their

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The notices must include the start and end times, as well as all the documentation that will be processed.

These measures may be reviewed periodically by the entity if necessary adapt them to new and future needs of the organization.

5. TRAINING AND AWARENESS-RAISING ACTIVITIES ON DIGITAL DISCONNECTION RIGHTS.

The entity will disseminate this policy internally through:

- Periodic internal communications for all employees of the entity.
- The continuous availability of this policy at the location designated by the Entity for such purpose.

In keeping with the Entity's commitment to maintaining a healthy and harmonious work environment, all Its members, regardless of their category, level or position held, must collaborate in the correct application of this Policy.

In addition, training and awareness sessions on the use will be given periodically. rational use of technological tools. To this end, these training sessions will be included within the Plan. Training.

This policy is mandatory for all employees of the Entity. Failure to comply with the obligations established therein may give rise, when corresponds to the application of the sanctioning regime provided for in the Workers' Statute and, where applicable, in the current Collective Agreement that applies.

6. POLICY REVIEW.

This Policy may be revised to incorporate modifications and updates are considered necessary to ensure their correct application and adaptation to the needs of the organization.

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7. DISSEMINATION OF THE POLICY.

This Policy is available and constantly updated on the website of the

The entity will remain available to all staff.

IMPORTANT: The measures guaranteeing the right to digital disconnection will not apply in the following cases of force majeure or exceptional circumstances, such as temporary emergencies that require a response immediate. Likewise, those whose duties require a special availability regime will have to to handle communications and/ or services in accordance with the regulations governing the aforementioned system.

Eiffage Metal, September 2026

Abelardo Sánchez Sánchez

Director General

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