



Corporate Digital Disconnection Policy

CEO
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VERSION CONTROL

Version	Date	Changes
V1	18/11/2020	New Creation
V2	19/07/2024	Update

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1. Purpose

The Digital Disconnection Policy aims to establish and regulate the general provisions and guiding principles of the right to limit the use of communication technologies (calls, video calls, electronic mails (emails), messages, WhatsApp, etcetera, of work content) that guarantees rest time and personal and family privacy of workers.

URBASER is committed to its employees in terms of caring for their social, physical and mental health, boosting their satisfaction, increasing their motivation at work and favoring the reconciliation of family and work.

In Spain, more specifically in Article 88 of Organic Law 3/2018, on the Protection of Personal Data and Guarantee of Digital Rights, in relation to Article 20 bis of Royal Legislative Decree 2/2015, of October 23, approving the revised text of the Workers' Statute Law, digital disconnection is not only a necessity for working people, but also a labor right that people have not to connect to any digital device of a professional nature during their rest periods, outside working hours.

The duty of companies to guarantee this right is also included in Law 10/2021, of July 9, 21, on telecommuting.

2. Scope of Application

This Policy applies to all directors, managers and employees, including managers and members of the governing bodies of the various companies that make up Urbaser, its subsidiaries and wholly or majority-owned companies and joint ventures controlled by Urbaser management or in which Urbaser has a majority interest. However, the agreements established or to be established in the future through collective bargaining in the different companies belonging to URBASER and that make up its Group of companies must be respected.

3. Content

With respect to the present Policy, URBASER achieves the following commitments:

- Guarantee the right to digital disconnection both for workers who work in person and in cases of total or partial remote work, as well as in the employee's home linked to the use of technological tools for work purposes.
- URBASER employees shall have the right not to respond to any communication, regardless of the means used (telephone, e-mail, message, etc.), once their working day is over, except in cases of exceptional circumstances, due to force majeure, or that involve a serious, imminent or evident damage to the company or the business, whose temporary urgency requires an immediate response.
- Those employees who remain at the Company's disposal due to the intrinsic and inherent characteristics of their job and functions that require regular availability and repeated alterations of schedules and in those cases in which there are circumstances of force majeure or that involve a serious, imminent or evident damage to the Company are expressly excluded from the application of the right to digital disconnection.
- With the exceptions contained in the previous point, recognize and formalize the right to digital disconnection as a right, although not an obligation, applicable to all workers with the exceptions contained in the previous point. This expressly implies that those workers who make communications outside working hours may do so freely; however, they must assume that they may not receive a response until the following working day.
- Employees may not be disciplined for exercising their right to digital disconnection under the terms established in this policy. The exercise of the right to digital disconnection shall not have a negative impact on the professional development of employees.

- Implement training and awareness-raising actions for personnel on the reasonable use of technological tools, informing employees of the need to protect this right. In this way, those who have responsibility over a team and/or the hierarchical superiors of the workers, should encourage and instruct through the responsible use of technologies and with the purpose of complying with the right to digital disconnection.

4. Non-compliance

This Policy is considered a mandatory rule, so that its violation may lead to the depuration of the responsibilities that may have been incurred.

5. Review and Update

Human Resources Management will periodically review the content of this Policy to ensure that it complies with regulations and includes the latest recommendations and best practices, proposing any updates that contribute to its development and continuous improvement.



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