



DIGITAL DISCONNECTION POLICY

The following is a translation of this policy provided for informational purposes only. In the event of any discrepancy or inconsistency, the Spanish version shall prevail and be considered the sole legally valid and binding text.

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1.- PURPOSE

In compliance with the General Data Protection Regulation (GDPR) and Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD), GRUPO FEDOLA, comprising: GRUPO FEDOLA, S.L.; PREFABRICADOS TEIDE, S.L.; FERRETERÍA HERMANOS LÓPEZ ARVELO, S.L.U.; OFISABEL, S.L.U.; MASQUECARPAS, S.L.U.; FEDOLA, S.L.U.; BROKER FEDOLA CORREDURÍA DE SEGUROS, S.L.U.; PRICEMESA, S.L.U.; AGRO INNOVACIÓN FEDOLA, S.L.U.; GF-TIC, S.L.U.; CAMULSE, S.L.U.; EXPLOTACIONES SANTONEL, S.L.; FELAHOTEL, S.L.; COSTA ADEJE GRAN HOTEL, S.L.; ISABEL FAMILY HOTEL, S.L.U.; NOELIA PLAYA, S.L.U. (hereinafter “GRUPO FEDOLA”), establishes this DIGITAL DISCONNECTION POLICY AND RULES FOR THE USE OF DIGITAL DEVICES BY ITS EMPLOYEES in order to safeguard employment rights and ensure the security of operations, processing facilities, premises, equipment, systems, software and all individuals involved in the processing of personal data.

The Spanish Workers’ Statute broadly recognises the right to privacy in the use of employees’ digital devices, the right to digital disconnection, and the right to privacy in relation to the use of video surveillance and geolocation devices, leaving a wide margin for the parties to regulate these matters.

The Right to Digital Disconnection means that every employee has the right:

- NOT to answer company calls outside their working hours.
- NOT to access company email outside their working hours.

- NOT to use company digital devices or any other digital platforms that constitute work tools provided by the company and, ultimately, NOT to work outside their working hours unless otherwise agreed.

2.-SCOPE OF APPLICATION

This policy applies to all autonomous and legally independent companies (whether currently existing or established in the future) that form part of the “Grupo Fedola” business group.

For the purposes of this policy, “Grupo Fedola” or the “Group” shall mean all the independent companies comprising the Group, to which this policy applies: GRUPO FEDOLA, S.L.; PREFABRICADOS TEIDE, S.L.; FERRETERÍA HERMANOS LÓPEZ ARVELO, S.L.U.; OFISABEL, S.L.U.; MASQUECARPAS, S.L.U.; FEDOLA, S.L.U.; BROKER FEDOLA CORREDURÍA DE SEGUROS, S.L.U.; PRICEMESA, S.L.U.; AGRO INNOVACIÓN FEDOLA, S.L.U.; GF-TIC, S.L.U.; CAMULSE, S.L.U.; EXPLOTACIONES SANTONEL, S.L.; FELAHOTEL, S.L.; COSTA ADEJE GRAN HOTEL, S.L.; ISABEL FAMILY HOTEL, S.L.U.; NOELIA PLAYA, S.L.U.

Accordingly, this policy applies to all employees, including those holding managerial positions, irrespective of whether they perform their duties on-site at the workplace or remotely through teleworking arrangements.

Any exception involving on-call duties or availability requirements must be collectively negotiated, voluntary in nature and appropriately compensated.

3.- PRINCIPLES GOVERNING THIS POLICY

This policy is governed by the following principles:

A. **Digital Disconnection as a Right:** Digital disconnection is a right and, consequently, does not constitute an obligation. Likewise, any voluntary connection by employees outside working hours shall not give rise to any liability on the part of the company.

B. **Respect for Rest Periods and Personal Privacy:** Grupo Fedola recognises, in all circumstances, the right of employees to digital disconnection in order to guarantee respect for rest periods, leave entitlements, holidays, and personal and family privacy outside working hours, except in situations of urgency, extreme necessity or force majeure.

C. **Distinction Between Working Time and Rest Time:** Grupo Fedola shall ensure that employees are able to exercise their right to digital disconnection.

This right shall take into account the nature and purpose of the employment relationship and, through the clear distinction between actual working time and personal rest time, shall contribute to a better work-life balance.

D. **The Exercise of the Right to Digital Disconnection Shall Not Result in Disciplinary Measures:** Provided that productivity and the proper provision of services are maintained, exercising the right to digital disconnection shall not result in disciplinary measures nor have any adverse effect on performance evaluations.

The right to digital disconnection is implemented through this internal policy, prepared in accordance with applicable legislation, and shall generally be governed by the following rules:

A. As a general rule, Grupo Fedola employees shall neither attend to nor use company digital devices outside their working hours.

B. Grupo Fedola employees shall not send work-related emails outside their working hours. Sending emails during public holidays or annual leave periods is prohibited except in situations of urgency, extreme necessity or force majeure. Accordingly, the use of automatic out-of-office replies and delayed email delivery functions is encouraged as good practice.

C. No employee may require a response to an email sent outside the recipient's working hours, except in situations of urgency, extreme necessity or force majeure. Similarly, employees shall avoid marking emails as urgent unless this is strictly necessary.

4. MEASURES TO GUARANTEE THE RIGHT TO DIGITAL DISCONNECTION WITHIN GRUPO FEDOLA

4.1. USE OF IT AND TECHNOLOGICAL RESOURCES

Employees undertake to make appropriate use of the IT and technological resources made available by the company and to avoid using them outside their agreed working hours.

Those responsible for managing teams are required to comply particularly strictly with digital disconnection policies, given their role as a reference point for the teams they supervise.

Accordingly, managers and supervisors shall refrain from requesting responses to communications sent to employees outside working hours, except in situations of urgency or force majeure.

Where it is absolutely necessary to contact an employee after the end of their working day, the preferred method shall be by telephone, in order to explain the urgent circumstances justifying the contact and discuss the possibility of addressing the issue, always subject to prior agreement between the parties.

4.2. COMMUNICATIONS

Work-related communications shall not be issued between the end of one working day and the beginning of the next.

The above restriction shall not apply in the following circumstances:

A. **Situations of Urgency or Extreme Necessity:** These are situations that may pose a serious risk to individuals or cause significant harm to the business and whose urgency requires special measures or an immediate response. For the purposes of this policy, urgent situations shall include:

- Incidents affecting the safety or physical integrity of guests, employees or third parties, including accidents, medical emergencies, fires, evacuations or situations involving imminent danger.
- Serious breakdowns or critical technical incidents affecting facilities, systems or equipment essential for hotel operations (electricity, water supply, air conditioning, fire protection systems, lifts, kitchens, IT systems or management systems) requiring immediate action.
- Situations that may seriously compromise business continuity or hotel operations, such as unexpected shortages of personnel in critical positions that cannot be resolved through normal procedures.
- Significant guest-related incidents that may lead to substantial reputational risk, serious disputes, major complaints or situations requiring immediate intervention by management.
- Urgent requests from competent authorities (police, judicial, health, labour or other authorities) requiring an immediate response from the company.

B. **Force Majeure Events:** Legally recognised force majeure events are those occurring outside the company's sphere of control, entirely independent of its will, which are unforeseeable or, if foreseeable, unavoidable. Examples include pandemics, fires, earthquakes, cyberattacks, war and similar events.

4.3. MEETINGS AND SIMILAR ACTIVITIES

As a general rule, meetings shall take place during normal working hours.

However, where organisational requirements make it necessary to schedule meetings outside normal working hours, attendance shall be strictly voluntary and no adverse consequences whatsoever may arise from an employee's decision not to attend.

4.4. DRIVING

Employees who receive work-related calls while driving during working hours shall only answer them where they have equipment that enables them to do so in compliance with current traffic legislation and the regulations issued by the Spanish Directorate-General for Traffic (DGT), and only where road safety can be guaranteed.

Otherwise, the call shall be returned at the first available opportunity after the employee has stopped driving.



Furthermore, employees are encouraged to activate the “Do Not Disturb” function on company mobile phones or other devices while driving during working hours, so that an automatic response can be sent informing callers of the situation.

5. INFORMATION AND AWARENESS ACTIONS

Grupo Fedola shall promote and fully respect compliance with all applicable legislation concerning employees’ right to rest following the completion of their working day, as well as during periods of absence from work.

The company shall provide specific information and guidance to all employees, particularly those holding managerial positions, regarding time management and respect for private life.

Grupo Fedola shall disseminate this policy internally through:

- Periodic internal communications addressed to all employees.
- Publication of this policy on the corporate App and corporate website.

6. VALIDITY AND REVIEW

This policy is a living document and shall be subject to periodic review by Grupo Fedola in order to adapt it to any developments or changes arising in this area, following consultation with the Works Council.

7. COMMITMENT AND BREACHES

Grupo Fedola is committed to ensuring the implementation and effective application of this policy and, consequently, to adopting the appropriate measures in the event of any infringement of the right to digital disconnection.

Employees may report any such infringement through any of the internal communication channels made available by the company.