

AMPER GROUP DIGITAL DISCONSEMINATION POLICY

Corporate policy

Adopted by the Governing Council at its meeting of 27 July 2022

CONTENTS

1. INTRODUCTION AND CONCEPT OF DIGITAL DISCONSEMINATION

2. LEGAL SCOPE

3. SCOPE OF THE PROTOCOL

4. OBJECTIVE AND IMPLEMENTATION OF THE PROTOCOL

5. THE RIGHT TO DIGITAL DISCONSEMINATION

6. MEASURES

7. WORKERS IN NON-PRESENTIAL MODALITY

TOTAL OR PARTIAL

8. USE OF TECHNOLOGICAL TOOLS

9. EXCLUSION SITUATION OF PROTOCOL MEASURES

10. FORCE OF THE PROTOCOL

11. ENTRY INTO FORCE

12. COMPLIANCE, REVISION, AMENDMENT AND INTERPRETATION OF POLICY

1.- INTRODUCTION AND CONCEPT OF DIGITAL DISCONNECTION

Technological changes in recent decades have led to changes in labour relations. Computers, mobile phones, tablets, etc. are part of our working life and have an impact on working relationships between companies and working people. If they are not used properly, they may pose problems in the health of working people (computer fatigue, burnout syndrome, stress, etc.).

It is therefore important to ensure that all these elements that break into labour relations are properly managed.

In this context, the right to digital disconnection arises from the **need to establish limits to working hours and to the obligations of working people**, in order to allow a rest that has been negatively affected by the emergence into our society of mechanisms for such widespread use as mobile ones.

We are aware of these situations from the management of Grupo Amper and have therefore decided to approve, after consulting the representatives of the working people, this **DIGITAL DECONEXIÓN PROCOTOL that guarantees the rights of the working people to digital disconnection and to preserve the rest time after the end of the working day.**

The workers of the societies that make up Grupo Amper will have the right to digital disconnection in order to guarantee, outside the hours of work legally or conventionally established in the company, respect for their rest time, leave or vacation, as well as their personal or family privacy.

2.- LEGAL FIELD

With the entry into force of Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights amending, among other legal provisions, the Consolidated Text of the Law on the Status of Workers by the inclusion of a new article, the 20 bis, and thus regulating a new right for workers:

Article 88 of the LOPDGDD protects and guarantees the right to digital disconnection as it provides that:

“1.- and public employees shall have the right to digital disconnection in order to ensure, outside legally or conventionally established working time, respect for their rest time, leave and vacation, as well as their personal and family privacy.

2.- The modalities for the exercise of this right shall take account of the nature and object of the employment relationship, and shall enhance the right to the conciliation of the

work and personal and family life and shall be subject to the provisions of collective bargaining or, failing that, to the agreement between the undertaking and the workers' representatives.

3. The employer shall, after hearing the representatives of working persons, draw up an internal policy for workers, including those in managerial positions, defining the modalities for exercising the right to disconnect, training and awareness-raising activities for staff on the reasonable use of technological tools to avoid the risk of computer fatigue. In particular, the right to digital disconnection shall be preserved in cases of full or partial performance of distance work, as well as in the home of the employee linked to the use of technological tools for work purposes.”

3.- SCOPE OF THE PROTOCOL

The measures provided for in this Protocol shall be addressed to **all workers in the companies that make up Grupo Amper**, regardless of their group and professional category, as well as their working conditions, including those workers who have by agreement a partial or total benefit of their work at a distance (“non-personal mode”), as well as to those workers who hold managerial positions within Grupo Amper.

4. OBJECTIVE AND IMPLEMENTATION OF THE PROTOCOL

The provisions of this Protocol shall aim at **establishing measures to ensure that working persons can effectively enjoy their rest and vacation time**, and that their personal and family privacy is preserved, regardless of the working day they have set up or if they perform part or all of their work in the form of distance work, better known as “non-witness mode”.

The Protocol is binding on all members of the company, with the same responsibility of all employees that can be carried out, and the role of management and middle management is therefore particularly relevant in order to ensure compliance with this Protocol.

5.- THE RIGHT TO DIGITAL DISCONNECTION

As part of a proper reconciliation of professional and personal life, the Amper Group Directorate recognizes the right of working people not to attend to digital devices, and not to read or respond to any communication outside the working day, whether by telephone, e-mail, instant messaging applications (Whatsapp, Hangouts, etc.) or any other digital tool that disrupts their right to rest, as well as not to attend to professional subjects outside their working hours, unless the circumstances referred to in point NINTH are present.

In general, communications on professional subjects will be made within the working day, and in any case, working persons will have the right not to reply to communications received after their working hours have ended, unless this is an exceptional situation due to

a cause of force majeure requiring contact with them. In such cases, it will always be preferable to use it as a telephone call rather than an email or other form of communication.

6.- MEASURES

The following measures will be taken by Grupo Amper in order to implement in the company the right to digital disconnection of all workers:

a) It is established that the daily, weekly, leave or vacation time of working persons shall be respected.

Thus, working persons have the right not to respond to any form of communication by any channel carried out outside their working hours, except because of force majeure or exceptional circumstances.

The following shall be included in the legal texts of the e-mails:

Workers have the right not to attend to communications received after the end of their working hours, except because of force majeure or exceptional circumstances that may be detrimental to the company.

The call for and attendance at work meetings is of a face-to-face or telematic nature and shall be held within the limits of the usual working day or working hours. The duration of these meetings may not be extended beyond the end of the working day or regular working hours, respecting rest times, weekends and/or official holidays at the local, regional and national levels.

b) It shall be avoided, to the extent possible, the dispatch of professional communications after the working day, as well as making telephone calls outside the established working hours of the enterprise, except for reasons of force majeure or exceptional circumstances.

c) When e-mails are sent outside working hours, the delayed shipment configuration will preferably be used to deliver messages within the recipient's working hours and this practice will be promoted within the organization of the societies that make up the Amper Group

d) In order to improve the management of working time, the following measures will be pursued:

- to avoid calls for training, meetings, videoconferences, etc. outside the working day daily routine of each working person.
- to convene meetings, training days etc. well in advance and estimate a duration for workers to plan their day.

- e) Workers in the societies that make up the Amper Group **shall not be subject to any recrimination or punishment** for not having been connected to and pending their obligations in the course of working hours during vacation days, leave, weekends, hours of rest between working hours and working hours, etc., which they are entitled to by law.

In this regard, the Amper Group Directorate imposes an obligation on workers to leave a notice message in the e-mail indicating that they are “absent”, the dates between which they are absent, as well as the contact details of the worker with whom they could contact during that period. For Example:

Good morning:

Thank you so much for your mail. I'm currently out of the office. From day DD/MM/YY I will be available again.

For reasons of confidentiality, your mail will not be forwarded. For emergencies you can contact: COMPANY NAME (companion@example.es).

Thank you very much, a cordial greeting.

SIGNATURE

- f) Workers holding positions involving a team of dependants (intermediate commanders or management positions) must, in particular, comply with digital disconnection policies, having a reference position with regard to the teams they coordinate.

Therefore, hierarchical superiors will not require a response in communications sent to their staff outside working hours when the communication has been made at a very close time to the end of working hours and the latter requires workers to extend their working hours in order to respond to it.

7.- WORKING PERSONS IN TOTAL OR PARTIAL NON-PRESENTIAL MODALITY

In view of the special nature of workers in a non-existent or partial form of work, Grupo Amper will guarantee the right to digital disconnection both to workers who carry out their work in a face-to-face manner and to the situations of full or partial realization of work at a distance, as well as at the home of the worker linked to the use of technological tools for work purposes, and must comply with all the measures referred to in point SEXTO.

8.- USE OF TECHNOLOGICAL TOOLS

With regard to the use of the working tools provided by the Amper Group, including computer systems and equipment and technological means made available to staff and to ensure their proper use, the following rules are laid down for their correct use:

Workers must make appropriate and responsible use of the technological tools (mobile phone, tablet, computer etc.) made available to them, avoiding as far as possible their use outside working hours.

The company's computer systems and equipment are exclusively professional in use.

Access to the Internet is limited to those workers who need to use it for the time necessary to carry out the necessary consultations for their work.

In the use of e-mail it will not be possible to access the e-mails of other users without their authorization, send offensive content e-mails or use the e-mail account for purposes other than those for which they have been assigned.

9.- STATUS OF EXCLUSION OF PROTOCOL MEASURES

In those positions with special responsibility within a productive or organizational unit of Amper Group (directors, heads of departments or the like), as well as for those with managerial positions, the measures guaranteeing the right to digital disconnection will not apply in cases where circumstances of cause of force majeure or that present serious, imminent or obvious harm to the societies that make up Amper Group and therefore require some precise action by their working persons at that particular time, or even if by virtue of their functions they must make guards.

10.- FORCE OF THE PROTOCOL

This Protocol shall enter into force with the publication and communication of the Protocol and shall be in force until it is renewed by a similar policy regulating the same situations.

11.- ENTRY IN FORCE

This Policy shall enter into force upon its approval by the Board of Directors of AMPER S.A..

12.- COMPLIANCE, REVISION, AMENDMENT AND INTERPRETATION OF POLICY

The Corporate Directorate of Human Resources and the Directorate of Compliance shall have an obligation to ensure compliance with this Policy. To this end, the Compliance Authority shall monitor this Policy and its implementation annually, in accordance with the regulatory compliance risk assessment model, and report any identified non-compliance to the Compliance Committee.

The Human Resources and Compliance Directorates shall be responsible for the review and proposal to update this policy, at least annually or in the event of a change in the policy.

legal regulations advising its modification. As well as, in the exercise of internal control measures in the light of developments observed in the sector and the analysis of the business and operational profile of the Entity, where appropriate. The amendment of this

Policy shall be approved by agreement of the Management Board, after the report of the Appointments and Remunerations Committee, except where the amendment is at the initiative of the Management Board itself.

This policy shall be interpreted in accordance with the Society's Governance System.

Any doubts or disagreements regarding the interpretation of this policy will be resolved by the Corporate Human Resources Directorate. The Committee on Audit and Control shall be informed of the interpretation and resolution of any doubts or discrepancies arising.