

	RIGHT TO DISCONNECT FROM WORK POLICY	CODE: -DI-SST-04
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In compliance with the provisions of **Law 2191 of 2022, Constitutional Court Judgment C-331 of 2023**, and other applicable regulations in force, **SMART LIFE S.A.S.** establishes the **Right to Disconnect from Work Policy**, with the purpose of ensuring that employees maintain a balance between their work and family lives.

For this purpose, the policy is based on the following commitments:

SMART LIFE S.A.S., aware of the importance of providing a comprehensive well-being environment that is productive, healthy, safe, and appropriate for those who work in the company, states that all employees have the **right to disconnect from work**, providing the necessary time and space for the use of free time, rest, leaves, permits, and vacations as periods that allow employees to reconcile their personal, family, and work lives.

SMART LIFE S.A.S. relies on the active participation and responsibility of all employees in complying with agreements concerning goals, productivity, working hours, responsibilities, and the proper use of rest periods with the right to disconnect from work, thereby building a productive and well-being-oriented work environment, promoting work-life balance, reaching agreements, resolving potential conflict situations, and appropriately managing situations of potential disagreement.

SCOPE AND GUARANTEE OF THE RIGHT

The **Right to Disconnect from Work** is the right of employees not to be contacted, through any technological or non-technological means or tool, regarding matters related to their work activities outside their regular working hours, maximum legal working hours, or agreed working hours, or during their rest periods, leaves, or vacations. SMART LIFE S.A.S. shall refrain from issuing work-related orders or requests outside these periods, except in the exceptional circumstances established by applicable regulations.

This guarantee applies to employees of SMART LIFE S.A.S., regardless of the work arrangement. Where remote work, telework, work-from-home, hybrid work, or other forms of work are implemented, rest periods and the right to disconnect from work shall likewise be respected.

GUIDELINES FOR THE USE OF ICT AND COMMUNICATIONS

- Communications, requests, meetings, and tasks should, whenever possible, be planned within working hours and according to the established responsibilities and schedules.
- Sending emails, instant messages, calls, video calls, or requests through corporate platforms outside working hours shall not, by itself, create an obligation to provide an immediate response during the disconnection period.
- When a technological tool allows communications to be scheduled, its use shall be encouraged to avoid unnecessary interruptions during rest periods.

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- The organization and its employees shall promote reasonable time management, avoiding repetitive communications, unjustified urgent requests, or meetings outside working hours when they can be scheduled within the working day.

As a mechanism for addressing potential violations of this policy, employees may report such situations through the internal channels established by SMART LIFE S.A.S., either directly or anonymously. When the facts may be related to workplace harassment, the corresponding procedure shall be followed in accordance with applicable regulations and internal procedures.

COMPLAINT HANDLING PROCEDURE

- 1. Receipt:** SMART LIFE S.A.S. shall provide mechanisms and means to receive complaints or reports regarding potential violations of the right to disconnect from work, either directly or anonymously.
- 2. Confidentiality:** The information shall be handled confidentially and shall only be accessed by those persons who are required to participate in the process, respecting personal data protection and due process.
- 3. Analysis and Processing:** The facts, circumstances, working hours or agreed time, channels used, and, where applicable, the reasons that led to contact outside working hours shall be reviewed.
- 4. Resolution:** Dialogue and conflict-resolution mechanisms shall be promoted, when appropriate, establishing commitments and measures to prevent recurrence of the conduct.
- 5. Follow-up:** Compliance with the agreements and cessation of the conduct shall be verified, with evidence of the follow-up conducted being maintained.
- 6. Escalation:** When the facts may constitute workplace harassment, the corresponding internal procedure shall be activated. Failure to respect the right to disconnect from work may constitute workplace harassment under the terms of Law 2191 of 2022 and other applicable regulations when its legal elements are met.

EXCEPTIONAL CIRCUMSTANCES

The right to disconnect from work is subject to the exceptions established in Article 6 of Law 2191 of 2022, including situations in which, due to the nature of the activity, permanent availability is required, as well as events of force majeure or unforeseeable circumstances requiring extraordinary duties of cooperation to ensure continuity of service or address difficult or urgent situations, provided that the absence of another viable alternative is justified. These circumstances shall not be used as an ordinary or arbitrary practice.

In accordance with **Constitutional Court Judgment C-331 of 2023**, individuals holding management, positions of trust, and positions involving authority and responsibility also

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have the right to disconnect from work and to rest. In such cases, the availability inherent to their duties shall be subject to criteria of necessity and proportionality and may not disregard the minimum content of the fundamental right to rest.

RESPONSIBILITIES OF SMART LIFE S.A.S.

- Communicate this policy and raise employees' awareness regarding the right to disconnect from work.
- Promote work-planning practices that allow duties to be performed within the agreed working hours.
- Strengthen responsible habits regarding the use of information and communication technologies.
- Monitor the reports or complaints received and adopt the corresponding preventive or corrective measures.
- Coordinate this policy with actions for the promotion of mental health, prevention of psychosocial risk factors, and other relevant SG-SST activities.

RESPONSIBILITIES OF EMPLOYEES

- Respect the working hours, rest periods, and disconnection periods of other employees.
- Plan and prioritize their activities to support the fulfillment of responsibilities within working hours.
- Use corporate communication channels and tools responsibly.
- Promptly report situations that may violate the right to disconnect from work through the mechanisms established by the company.

The company, for its part, is committed to implementing actions that promote productivity during the agreed working hours, providing feedback on employees' efforts and performance, allowing employees' physical and mental recovery, and contributing to comprehensive well-being both within and outside the workplace. These activities shall include:

- Awareness-raising and training on topics that strengthen the effective use of working and non-working time, such as mechanisms and practices for disconnecting from work.
- Periodic monitoring of the implementation of the policy and the improvement opportunities identified.

Any person who fails to comply with the Right to Disconnect from Work agreements established in this policy and with the other elements arising from it shall be guided in accordance with the provisions of applicable regulations.

Based on the foregoing, this policy is signed and shall enter into force on **September 21, 2026**, replacing the previous version.



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