

GRUPO HAFESA

Internal Information System Policy

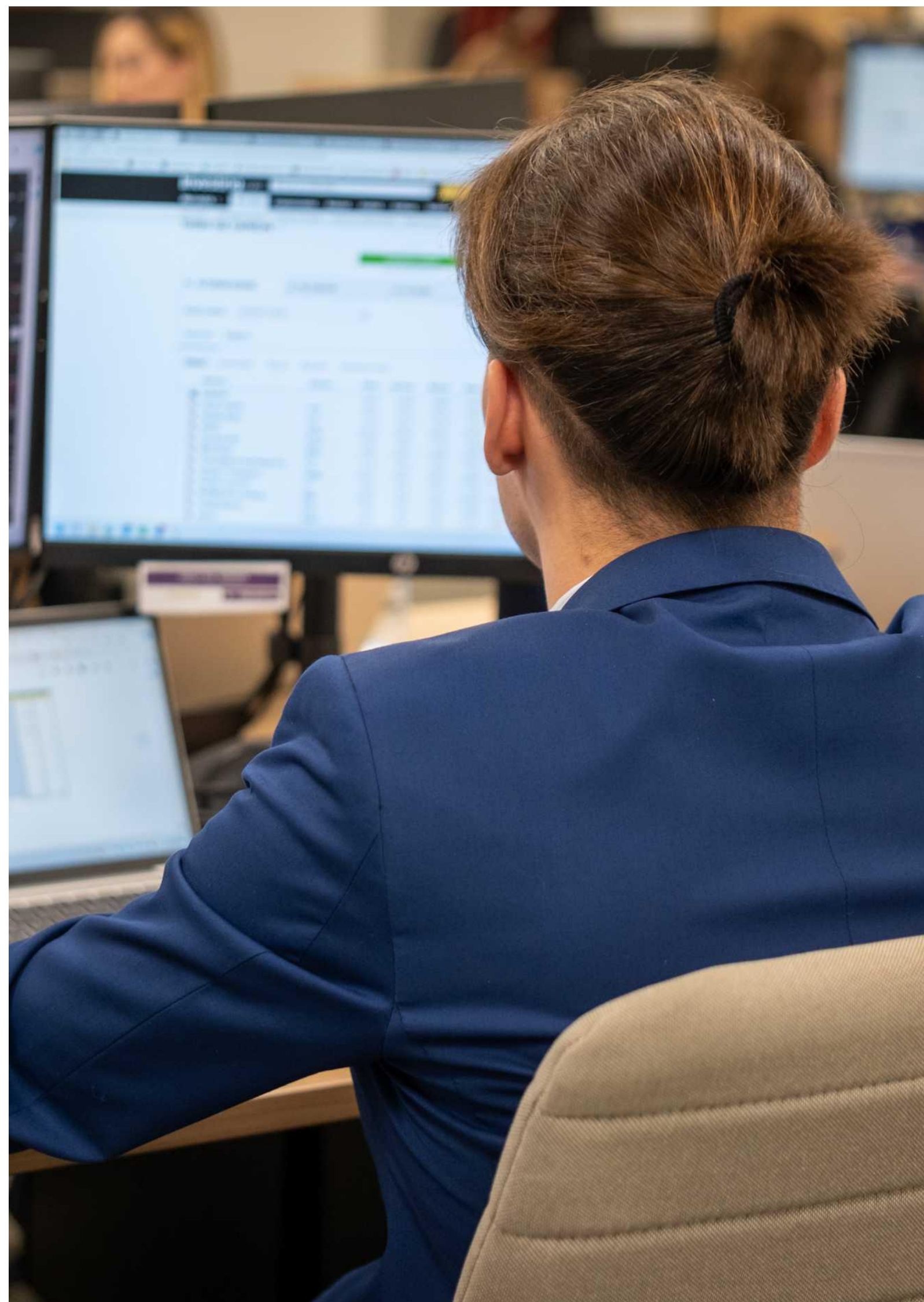
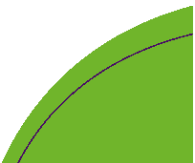


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1. Introduction

On 21 February 2023, in the Official State Gazette, Law 2/2023, of 20 February was published, regulating the protection of persons reporting on regulatory infringements and fight against corruption, thus incorporating into Spanish law Directive (EU) 2019/1937 of the Parliament and of the Council, of 23 October 2019, on the protection of persons reporting on infringements of the European Union law.

The aforementioned Law 2/2023, in accordance with the Directive, aims to protect persons who, in a work or professional context, detect certain regulatory violations and report it through the internal information channels enabled for that purpose, granting adequate protection against any type of retaliation by establishing an internal information system, made up basically of

1. an Ethical Channel, as preferred International Information Channel for the reception of the information included within the scope of the standard,
2. a management procedure, and
3. a person responsible for the operation and management of the system and for the diligent processing of the information received.

For these purposes, and in accordance with the provisions of the above-mentioned Law, **GRUPO HAFESA** updates the general regulatory framework already existing in the Group to the new legal provisions on the protection of informants, establishing this Corporate Policy of the Internal Information System.

2. Purpose

This Policy is configured as the basic document that includes the regulatory, operational and management framework of the Internal Information System of **GRUPO HAFESA**, established as the preferred channel for reporting, in general, on actions or omissions that:

- May constitute infringements of the European Union law, taking into account the considerations established in Law 2/2023.
- May constitute a serious or very serious criminal or administrative infringement.
- May involve non-compliance with the internal regulations implemented in **GRUPO HAFESA**.

Its purpose is to set forth and establish the general principles governing the Internal Information and Defense System of the Informant of **GRUPO HAFESA**, demonstrating its commitment to ethical behavior and to the protection of informants against retaliation.

3. Scope

This Policy is corporate in nature, and, consequently, its content is applicable to all the companies that make up the **GRUPO HAFESA**.

Thus, the Policy will apply to Informants who are in any of the following cases:

- a. Shareholders, members of the management body, managers and employees of any of the Group's companies.
- b. Any person who works for or under the supervision and direction of contractors, subcontractors, and suppliers of any of the Group's companies.
- c. Those who have obtained the information during an employment relationship already ended.
- d. Volunteers, trainees and employees in training periods, whether or not they receive a remuneration.
- e. Those whose employment relationship has not yet begun, if the information has been obtained during the selection or pre-contractual negotiation process.
- f. Third parties that interact with any of the companies of the Group (clients, creditors, collaborators, prescribers, agents, etc...)

4. General principles

The general principles and guarantees governing the Internal Information System of **GRUPO HAFESA** are as follows:

Regulatory compliance and corporate ethics: Legality and corporate ethics are integral principles of the Internal Information System, whose management will be governed by legislation in force, this Policy, and the management procedure of the Internal Information System.

Independence and autonomy: In the Internal Information System of GRUPO HAFESA, the Compliance Office is the person responsible for the system, and the top head of the regulatory compliance section, who develops his/her functions independently and autonomously.



Good faith: All information provided must meet criteria of truthfulness and good faith, avoiding the provision of confusing, false, or unreliable information. The submission of a false or bad faith Communication shall involve the adoption of legal or disciplinary measures, if appropriate, against the guilty person.

Absence of retaliation and protection of the informant or other persons involved or related to the Informant: Acts constituting retaliation, including threats or attempted reprisal, against persons submitting a Communication in accordance with the law in force and in good faith, are expressly prohibited.

Moreover, the measures of protection of the Informant shall also apply, where appropriate, to:

- The legal representatives of employees in the performance of their consulting functions and support to the Informant.
- Individuals who, within the framework of the organization in which the Informant provides services, assist the Informant in the procedure.
- Individuals who are related to the Informant and who may suffer retaliation, such as co-workers or relatives of the Informant.

Legal entities for whom he/she works, or with whom he/she maintains any other type of relationship in a work context, or in which he/she has a significant participation.

Traceability and security: The communications and information sent through the Internal Information System will be recorded and processed in accordance with the management procedure of the Internal Information System of GRUPO HAFESA, preserving in all cases the integrity of the information and documentation submitted, by applying the necessary security measures.

Transparency and accessibility: Information relating to the Internal Information System shall be provided in a clear and easily accessible manner and with sufficient publicity on its use, principles and guarantees.

Diligence and speed: Any unjustified delay in the conduct of the investigation procedure should be avoided by processing communications received with interest, speed and efficiency, avoiding internal or external interference.

Integration: The Internal Information System integrates all the internal channels of communication of irregularities existing in GRUPO HAFESA. Among these channels and as main route is the Ethical Channel that allows the presentation of written communications through a corporate platform, whose access is advertised in the space of the corporate website.

In any case, at the request of the interested party, Communications may also be made by a face-to-face meeting.

External information channel: Without prejudice to the detailed access routes, at any time, any interested party may contact the Independent Protection Authority or competent autonomic body.

Confidentiality: Confidentiality is the guiding principle of any action within the Internal Information System. The system is designed, established and managed in a secure way, so that the confidentiality of the identity of any informant or third parties mentioned in the communications is guaranteed, as well as the actions that are carried out for management and processing.



Access to information is restricted to persons with management authority, according to the functions assigned to them, and it is expressly prohibited to disclose any type of information about communications.

The identity of the Informant may only be communicated to the Judicial Authority, the Public Prosecutor's Office, or to the corresponding administrative authority in the framework of a criminal, disciplinary or sanctioning investigation, subject to the safeguards established in the applicable regulations.

Anonymity: Communications sent to the Internal Information System can be nominative, that is, with identification of the Informant, and anonymous.

The tracking and traceability of anonymous communications is prohibited. Failure to comply with this will entail the adoption of appropriate disciplinary measures.

Rights of the Persons Concerned: The presumption of innocence and the right to honour of the Persons Concerned, as well as the right to be heard, are guaranteed. Persons who may be affected by an internal investigation have the right to be aware of the communication against them as soon as the necessary verifications have been carried out, the file has been admitted and it is deemed appropriate to ensure the successful completion of the investigation.

Data protection: In the processing of information contained in communication files, the right of all persons involved to have their personal data and private information processed in accordance with the legislation on the protection of personal data applicable to each case, being applicable all the principles of data protection contained in the General Data Protection Regulation. In this regard, the processing of personal data resulting from the application of Law 2/2023 will be governed by the provisions of the RGPD and Organic Law 3/2018, of 5 December, on Protection of Personal Data and Guarantee of Digital Rights.

In no case will personal data be collected when they are not relevant to process specific information, or, if collected by accident, they will be deleted without delay.

5. Person Responsible for the Internal Information System

The administration body of **HAFESA PARTICIPACIONES SLU**, as the parent company of **GRUPO HAFESA**, has appointed as the head of the Internal Information System, the Compliance Officer, who will carry out these functions with full guarantees of autonomy and independence, without receiving instructions of any kind for the performance of the tasks, having all the personal and material means to carry them out, and without fear of reprisals.

To do this, the Compliance Officer, as responsible for the SII, has the powers of initiative and control necessary to supervise its operation, effectiveness and compliance with applicable policies.

6. Failure to comply with the policy

Failure to comply with this Policy will be punished in accordance with the applicable regulations in each case, considering the nature of the infringing person and his/her relationship with **GRUPO HAFESA**. Likewise, those persons who, being aware of the breach of this Policy, have allowed it by action or omission will be sanctioned. That stated above, notwithstanding legal actions that may correspond under the Law.

7. Consultations

Any enquiries regarding the provisions of this Policy can be sent to the address compliance@grupohafesa.com.

8. Approval

This Policy has been approved by the Administration Body of **HAFESA PARTICIPACIONES SLU**, as the parent company of **GRUPO HAFESA**.

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