

**DC1.1\_1**

**INTERNAL REPORTING SYSTEM  
REGULATIONS OF SUARDIAZ GROUP**

<b>SUARDIAZ</b>  Group	<b>INTERNAL REPORTING SYSTEM</b> <b>REGULATIONS OF SUARDIAZ GROUP</b>	<b>DC1.1_1</b>
		<b>Edition 02</b>
		<b>05/12/2025</b>

## REGISTER OF CHANGES

<b>Edition</b>	<b>Date</b>	<b>Section</b>	<b>Page</b>	<b>Description of the change</b>
01	27/11/2023			Initial Edition
02	05/12/2025			Ratification of Initial Edition and incorporation of the Ethics Unit Regulations

## LIST OF INTERNAL DISTRIBUTION

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Responsible Body for the Internal Reporting System

unidadadetica@suardiaz.com

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## 1. INTRODUCCION

On February 21, Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption, was published in the Official State Gazette (BOE). This Law adopts Directive (EU) 2019/1937 of the European Parliament and of the Council, known as the Whistleblowing Law, and entered into force on March 13, 2023.

Its main purpose is to provide adequate protection to natural persons acting as '*whistleblowers*' who report irregularities or regulatory breaches within an organization, whether in the public or private sector, provided that the employment or professional relationship in the context of which the infringement occurs is governed by Spanish law.

Internal reporting systems are the channels available to whistleblowers within companies to report wrongdoing. In the terminology used by the Law, *it is the preferred channel for reporting the actions or omissions mentioned in the material scope of application.*

For years, GRUPO LOGISTICO SUARDIAZ, S.L. and Subsidiary Companies (hereinafter, SUARDIAZ Group) implemented an Ethical Channel that serves not only as a communication channel that allows employees, customers, suppliers, and representatives of society in general, to communicate doubts and suggestions, but also works as a real Whistleblower Channel through which it is possible to report irregular conduct or any breach of current regulations.

Law 2/2023 has regulated and established the requirements to be met by the Internal Reporting Systems and, SUARDIAZ Group faithful to the principles of good governance and regulatory compliance, enables an Internal Reporting System, in order to prevent and detect any irregular, illegal, criminal or discriminatory conduct, encouraging those who have knowledge of a situation that may be considered illegal or irregular to report it immediately through the established channel.

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## 2. PURPOSE

The purpose of these Regulations is to regulate and implement the SUARDIAZ Group's Internal Reporting System.

Prior to this, and in accordance with the regulations in force, a prior consultation with the employees' representatives has been carried out.

The objectives of these Regulations include:

- i. To define the channels and the procedure for communication and management of the complaints received, as well as the guarantees and rights of the parties.
- ii. To protect employees and third parties from dishonest or discriminatory acts.
- iii. To encourage participation and communication between the Group and its stakeholders.
- iv. To prevent and detect possible non-compliance with regulations that may be occurring in the Group in order to correct them.

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### 3. APPLICABLE LEGISLATION

In addition to Directive (EU) 2019/1937 of the European Parliament and of the Council, and Law 2/2023 of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption, the SUARDIAZ Group's Corporate Governance and Sustainability Codes, Protocols and Policies are applicable:

- Ethics Code of SUARDIAZ Group.
- Action Protocol for the Purposes of Crime Control and Prevention and Anti-fraud of SUARDIAZ Group.
- Equal Opportunities Plan between Women and Men of SUARDIAZ Group.
- Effective Equal Opportunities Policy Statement of SUARDIAZ Group.
- Protocol in Support of Victims of Gender-Based Violence in the Workplace of SUARDIAZ Group.
- Protocol for Preventing and Acting Against Sexual and Gender-Based Harassment in the Workplace of SUARDIAZ Group.

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## 4. BASIC PRINCIPLES

### 4.1. GOOD FAITH

The whistleblower or informant shall be considered to be acting in good faith when his or her report is based on facts or indications from which it may reasonably be inferred that unlawful or criminal conduct or behaviour contrary to the principles, values or rules of conduct set out in the Ethics Code and the other policies approved by the Board of Directors has taken place.

It is considered that the complainant does not act in good faith when he/she makes the complaint with a spirit of revenge, or being aware of the falsity of the facts, acts with manifest disregard for the truth, or with the intention of harming the defendant or SUARDIAZ Group.

If the complaint is proven to have been made in bad faith, appropriate disciplinary and/or criminal action will be taken.

### 4.2. CONFIDENTIALITY

The identity of the complainant will be kept confidential and may not be communicated or disclosed to third parties without their express consent, with the exception of the administrative or judicial authorities, provided that they are required as a result of any proceedings arising from the subject of the complaint. Such transfer of data to administrative or judicial authorities shall always be made in full compliance with current legislation on personal data protection.

### 4.3. TRANSPARENCY AND FAIRNESS

Once a complaint has been received, the right to the presumption of innocence and defense of defendant or affected party is guaranteed, as well as the right to privacy of both the complainant and the accused.

The System Responsible is in charge of coordinating and promoting the processing and resolution of the complaints received in an objective manner and based on criteria of impartiality and respect for the principles of these Regulations.

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#### **4.4. WHISTLEBLOWER PROTECTION**

Regardless of the channel used, the protection of the rights of the complainant, the accused, witnesses, as well as any others who may intervene in the procedure is guaranteed.

SUARDIAZ Group guarantees the protection of the whistleblower against retaliation of any kind, direct or indirect.

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## 5. SUBJECTIVE SCOPE

The Reporting System may be used by:

- All members of the board of directors of the companies belonging to SUARDIAZ Group.
- Management and employees of SUARDIAZ Group.
- Business partners of SUARDIAZ Group.
- Any person working for or under the direction of contractors, subcontractors, and suppliers of SUARDIAZ Group.
- Interested parties and stakeholders of SUARDIAZ Group.

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## 6. MATERIAL SCOPE

Under the terms provided for in the current legislation, these Regulations shall be applicable to whistleblowers who report:

- a) Any act or omission that may constitute an infringement of European Union law when:
  - i) Enter within the scope of the acts of the European Union listed in the Annex to Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union Law, irrespective of the qualification of such breaches in the internal legal order; relating to:
    - Public procurement;
    - Financial services, products and markets, and prevention of money laundering and terrorist financing;
    - Product safety and compliance;
    - Transport safety;
    - Environmental protection;
    - Radiation protection and nuclear safety;
    - Food and feed safety, animal health and animal welfare;
    - Public health;
    - Consumer protection;
    - Privacy and personal data protection, network, and reporting systems security;
  - ii) Affecting the financial interests of the European Union; or
  - iii) have an impact on the internal market, including infringements of European Union rules on competition and aid granted by States, as well as infringements relating to the internal market in connection with acts that infringe corporate tax rules or practices intended to obtain a tax advantage that distorts the object or purpose of the legislation applicable to corporate income tax; (iv) have an impact on the internal market, including infringements of European Union rules on competition and aid granted by States, as well as infringements relating to the internal market in connection with acts that infringe corporate income tax rules or practices intended to

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obtain a tax advantage that distorts the object or purpose of the legislation applicable to corporate income tax.

- b) Actions or omissions that may constitute a serious or very serious criminal or administrative infraction. In any case, this shall be understood to include all those serious or very serious criminal or administrative infractions that imply economic loss for the Public Treasury and for the Social Security.

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## 7. THE RESPONSIBLE BODY FOR THE INTERNAL REPORTING SYSTEM

The Ethics Unit shall serve as the Responsible Body for the Internal Reporting System of SUARDIAZ Group, as a collegiate body regulated by its specific Regulations, and shall act in accordance with the composition, powers, and operating rules established in such Regulations and in this document.

The appointment, removal, and replacement of members of the Ethics Unit, in their capacity as the Responsible Body for the Internal Reporting System, shall be the responsibility of the Board of Directors of SUARDIAZ Group, in accordance with the provisions of the Ethics Unit Regulations.

The Ethics Unit, as the Responsible Body for the Internal Reporting System, may delegate to one of its members the powers for ordinary management and the processing of investigation cases, as established in the Ethics Unit Regulations.

In all cases, decisions regarding the acceptance or rejection of communications, the archiving of proceedings, and the proposal of disciplinary or corrective measures shall be made collectively by the Ethics Unit, in accordance with the principles established in this Regulation.

The Responsible Body may, if the situation so requires, retain the services of an external expert for the investigation of reported matters, ensuring in all cases compliance with the principles and guarantees set forth in this Regulation and applicable law.

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## 8. INTERNAL REPORTING SYSTEM

### 8.1. INTERNAL REPORTING CHANNEL

SUARDIAZ Group has set up the following communication channels:

- By e-mail [unidadetica@suardiaz.com](mailto:unidadetica@suardiaz.com).
- By post to the headquarters located at 28001 Madrid, calle Ayala No 6, to the attention of the Ethics Unit.
- By telephone at the following number +34 914316640.
- In person, by requesting a meeting with the Delegate of the Internal Reporting System (Delegate of the Responsible Body for the Internal Reporting System), which must be held within seven (7) working days of the request.

The queries received will be handled directly by the SUARDIAZ Group Ethics Unit through the procedures established for this purpose in the Ethics Code. For this purpose, the Ethics Unit will try to respond to the query or doubt received within a maximum period of 10 days from receipt and/or acknowledgment of receipt.

In the event that the inquiry or doubt received indicates the need to proceed with the opening of a whistleblowing investigation procedure, it will be processed in accordance with the Complaint Process (see Section 8.3. Management of Complaints).

### 8.2. COMPLAINT CONTENTS

The reports submitted must contain as detailed a description as possible of the facts that are the object of the complaint, identifying the persons involved, when and where the facts occurred, as well as any other information relevant to the investigation of the complaint. Likewise, the documentation available to the whistleblower on the facts denounced shall be attached.

The whistleblower may identify himself/herself or submit the complaint anonymously. In the event that the informant decides to remain anonymous, it is advisable to state the reason so that it can be taken into account when processing the complaint and carrying out the whistleblowing investigation, although the

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processing of the file may be limited due to the impossibility of verifying the veracity of the facts.

## 8.3. COMPLAINT MANAGEMENT

### 8.3.1. Receipt of complaints

The communication may be made anonymously or by name, the identity of the whistleblower being reserved and kept confidential in the latter case.

Verbal communications, including those made in person, by telephone or by voice messaging systems, shall be documented, subject to the consent of the whistleblower, in one of the following ways:

- By a record of the conversation in a safe, durable, and accessible format; or
- By a complete and accurate transcription of the conversation with the whistleblower being offered the opportunity to verify, rectify and accept the transcription of the message.

### 8.3.2. Admission of complaints

Once the communication has been received, the Responsible Body for the Internal Reporting System shall send acknowledgement of receipt to the whistleblower within seven (7) calendar days, except in cases of anonymous complaints or in those other cases in which the confidentiality of the communication may be threatened.

The next step is to verify whether the complaint sets forth facts or conduct that fall within the material scope of these Regulations as indicated in paragraph 6.

Within a maximum period of ten (10) working days from the receipt of the complaint, the Responsible Body for the Internal Reporting System will proceed to:

#### i) Dismiss the complaint

When:

- The facts reported lack any evidence or credibility.
- The facts reported do not fall within the material scope of these Regulations.

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- There are sufficient indications that the information was obtained unlawfully, in which case it may be referred to the judicial authority in case it constitutes a crime.

Dismissal must be reasoned, and the whistleblower must be notified, unless the communication was made anonymously.

## ii) Proceed with the complaint

In other cases, than those referred to in section i) above, the Responsible Body for the Internal Reporting System shall proceed to accept the complaint for processing, which will be reflected in an opening letter and initiating a whistleblowing investigation that will be notified to the whistleblower within the aforementioned period of ten (10) working days, except in the case that the communication has been anonymous.

Likewise, in the event that the facts could constitute a crime or affect the financial interests of the European Union, the Public Prosecutor's Office or the European Public Prosecutor's Office, respectively, shall be immediately informed.

### 8.3.3. Whistleblowing Investigation Report Instruction

Once the complaint has been accepted for processing, an investigation of the case will be carried out in order to verify the truthfulness of the facts reported.

The Responsible Body for the Internal Reporting System shall ensure, in any case, that the defendant by the communication is informed of the actions or omissions attributed to him/her, and to be heard at any time. This communication shall take place at the time and in the manner deemed appropriate to ensure the proper conduct of the investigation.

In no case will the identity of the whistleblower be communicated to the person under investigation, nor will access to the communication be given.

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The defendant shall be informed of the right to present written allegations and of the processing of his/her personal data, ensuring in all cases the right to the presumption of innocence and the honour of the persons concerned.

The Responsible Body for the Internal Reporting System may, whenever possible and whenever he/she considers it convenient for the investigation, hold an interview with the defendant in which he/she will be invited to explain his/her version of the facts and to provide such means of evidence as he/she considers appropriate and pertinent.

The members of the Internal Reporting System are subject to a commitment to keep secret and confidential any information they become aware of in the whistleblowing investigation process, except in cases where it is necessary to analyse conduct that appears to constitute a crime or affects the financial interests of the European Union, in which case they may seek appropriate legal advice.

In any case, anyone who has access to and/or knowledge of the file shall be obliged to keep the identity of the parties and its contents secret and confidential.

#### **8.3.4. Whistleblowing Investigation Report Resolution**

Once the instruction has been completed, the Responsible Body for the Internal Reporting System will issue a report with the following information:

- Date and Whistleblowing Channel through which the complaint was received.
- defendant.
- Description of the facts related in the complaint.
- Whistleblower investigation procedures conducted.
- Assessment of the proceedings and the evidence that supports them.
- Findings of the investigation.

Once the whistleblowing investigation report has been issued, the Responsible Body for the Internal Reporting System will proceed to adopt one of the following decisions:

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- a. To close the file on the grounds that there is no infringement of the material scope of these Regulations. The whistleblower and the defendant shall be notified of the filing of the case.
- b. To conclude that the defendant has committed a wrongdoing. If such a wrongdoing appears to constitute a criminal offence or to affect the financial interests of the European Union, the Public Prosecutor's Office, or the European Public Prosecutor's Office, respectively, shall be informed. If such a wrongdoing is considered to constitute an employment-related offence, appropriate disciplinary action will be recommended to the Human Resources Director.

The deadline for finalising the proceedings and providing the whistleblower with a response shall be a maximum of three (3) months from receipt of the communication or, if no acknowledgement of receipt was sent to the informant, from the expiration of the period of seven days after the communication was made. However, exceptionally, in cases of particular complexity, the period may be extended for an additional three (3) months.

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## 9. PROTECTION MEASURES

Any proceedings shall respect the rights and guarantees of whistleblowers, defendants, and witnesses.

In this regard, they shall be protected against any form of retaliation, discrimination, and criminalisation on the basis of the complaints reported.

### 9.1. CONDITIONS FOR PROTECTION

The whistleblowers who report or disclose infringements within the material scope of these Regulations shall have the safeguards in their actions set out in these Regulations provided that:

- They have reasonable grounds to believe that the information reported is true at the time of communication or disclosure, even if they do not provide conclusive evidence, and that the information falls within the scope of these Regulations;
- The communication is conducted in good faith and;
- That the communication is conducted in accordance with the requirements of the Law and these Regulations.

### 9.2. WHISTLEBLOWER RIGHTS

#### 9.2.1. Right to receive preliminary information

Prior to the communication, verbal or written, the whistleblower has the right to be informed about the whole process.

#### 9.2.2. Right to report anonymously or nominally

The whistleblower has the right to submit the communication anonymously or with a name and, in the latter case, the whistleblower's identity will be kept confidential, so that it is not revealed to third parties, while maintaining the principle of confidentiality.

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### **9.2.3. Right to use information on a restrictive basis**

The information provided by the whistleblower may not be used for purposes other than those of the investigation.

### **9.2.4. Right to confidentiality**

SUARDIAZ Group guarantees confidentiality in the reception of communications received, as well as in all the process and information gathered during the processing of the file.

### **9.2.5. Right to a fair investigation and to an impartial interlocutor**

Complaints received shall be managed with the utmost transparency and impartiality by the Responsible Body for the Internal Reporting System.

### **9.2.6. Data Protection Rights**

SUARDIAZ Group guarantees that all data provided by the whistleblower through the Internal Reporting System shall be processed in accordance with current data protection regulations, without prejudice to the rights of the whistleblowers.

### **9.2.7. Right to non-retaliation**

SUARDIAZ Group expressly prohibits any form of retaliation, including threats and attempts of retaliation against whistleblowers.

Retaliation means any act or omission that is prohibited by law or that directly or indirectly results in unfavourable treatment that places the persons subjected to it at a disadvantage compared to another person in the employment or professional context, solely because of their status as a whistleblower or because they have made a public disclosure.

For the purposes of the provisions of these Regulations, the following shall be considered retaliation, by way of example:

- a) Suspension of the employment contract, dismissal or termination of the employment or statutory relationship, including non-renewal or early

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termination of a temporary employment contract after the probationary period, or early termination or cancellation of contracts for goods or services, imposition of any disciplinary measure, demotion or denial of promotion and any other substantial modification of working conditions and failure to convert a temporary employment contract into a permanent one, where the employee had legitimate expectations that he/she would be offered a permanent job; unless these measures were carried out as part of the regular exercise of managerial powers under the relevant labour or public employee statute legislation, due to circumstances, facts or breaches that are proven and unrelated to the submission of the communication.

- b) Any injury, including reputational damage, or economic loss, coercion, intimidation, harassment, or ostracism.
- c) Negative assessment or references with regard to work or professional performance.
- d) Blacklisting or releasing information in a particular sectoral area, which hinders or prevents access to employment or the contracting of works or services.
- e) Refusal or revocation of a licence or permission.
- f) Denial of training.
- g) Discrimination, unfavourable or unfair treatment.

A person whose rights have been infringed as a result of communication or disclosure after the expiry of the two (2) year period may apply to the competent authority for protection.

### **9.3. DEFENDANT PROTECTION**

During the processing of the file, the persons concerned by the communication shall have the right to:

#### **9.3.1. Presumption of innocence**

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SUARDIAZ Group recognises the utmost respect for the presumption of innocence of the person reported during the processing of the case.

The rights of defence and access to the file are also recognised.

### **9.3.2. Right to information**

The right of the defendant to be informed of the acts or omissions attributed to him or her, and to be heard at any time, and that such communication shall take place at such time and in such manner as is considered appropriate to ensure the proper conduct of the whistleblowing investigation, is recognised.

### **9.3.3. Right to confidentiality**

SUARDIAZ Group guarantees the right to the preservation of the identity of the persons under whistleblowing investigation, guaranteeing the confidentiality of the facts and data of the procedure.

### **9.3.4. Data Protection Rights**

SUARDIAZ Group guarantees that all data of the defendant shall be processed in accordance with current data protection regulations, without prejudice to the defendants' rights.

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## 10. PERSONAL DATA PROTECTION"

The processing of personal data resulting from the application of Law 2/2023 shall be governed by the provisions of Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR), and by Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Personal data shall not be collected where it is manifestly not relevant for the processing of specific information or, if collected accidentally, shall be deleted without delay.

The lawfulness of the processing of personal data in relation to the Internal Reporting System is based on Article 6(1)(c) of the GDPR (legal obligation: Law 2/2023) and Article 6(1)(e) of the GDPR (public interest).

During the processing of the Internal Reporting System procedure, the data subjects (whistleblower and defendant) are informed in accordance with the provisions of Articles 13 and 14 of the European Data Protection Regulation.

Access to the data contained in the Internal Reporting System is limited within their competences and functions, exclusively to the Board of Directors, the person in charge of the Internal System, the Human Resources Director when sanctions must be adopted, the person in charge of the legal services if legal measures are required, and the Data Protection Officer.

The Internal Reporting System prevents unauthorised access and preserves the identity and guarantees the confidentiality of the data relating to the persons concerned and to any third party mentioned in the information provided, especially the identity of the whistleblower in the event that he/she has been identified. The identity of the whistleblower may only be communicated to the judicial authority, the Public Prosecutor's Office, or the competent administrative authority in the context of a criminal, disciplinary or disciplinary investigation, and these cases shall be subject to safeguards laid down in the applicable regulations.

If the information received contains special categories of personal data subject to special protection, it shall be deleted immediately, unless the processing is

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necessary for reasons of essential public interest as provided for in Article 9(2)(g) of the GDPR, as provided for in Article 30(5) of Law 2/2023.

Communications that have not been followed up may only be recorded in anonymised form, without the blocking obligation provided for in article 32 of the LOPDGDD being applicable.

SUARDIAZ Group has the appropriate technical organisational measures in place to preserve the identity and guarantee the confidentiality of the defendants and third parties involved.

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## 11. COMMUNICATION AND ADVERTISEMENT

In accordance with the terms of Law 2/2023, SUARDIAZ GROUP has a direct and easily identifiable access to the Whistleblower Channel published on its website, at <https://www.suardiaz.com/>.

These Regulations will be published on the website and made available to all employees together also with the management procedure of the Internal Reporting System.

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## **12. ADOPTION, EFFECTIVE DATE AND REVIEW OF THE DOCUMENT**

These Regulations is adopted by the Board of Directors of SUARDIAZ Group and shall come into force at the time of its publication on the website and may be reviewed when the circumstances that require it are modified.