

INTERNAL INFORMATION SYSTEM POLICY

INTERNAL INFORMATION SYSTEM POLICY

Introduction and purpose

The purpose of this document, as an integral part of the Company's criminal risk management policies and procedures, is to regulate the **Internal Information System Policy of CHEMIEURO S.L., BBH INVESTMENTS AND FUNDS, S.L. and CHEMIEURO INTERNATIONAL S.L.** -hereinafter CHEMIEURO-, in relation to the implementation of the **Internal Information Channel "TARGATIS"**.

The Internal Reporting System replaces the Whistleblower Channel in place to date, and aims to adapt it to the provisions of *Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption* - hereinafter, the Whistleblower Protection Act or The Act. Notwithstanding the fact that CHEMIEURO has less than 50 employees, it has been understood that the existence of a Whistleblower Channel and a Whistleblower Management Policy makes it advisable to adapt to the aforementioned regulations.

The Criminal Code warns in Rule 4 of Art. 31 bis 5 about the duty of the legal person to impose within the organisation the obligation to report possible risks and non-compliance through any tools or systems that make it possible to develop surveillance and control to prevent offences.

In Spain, the Attorney General's Office warned in its Circular No 1/2016 that *"the existence of channels for reporting internal breaches or illegal activities of the company is one of the key elements of the prevention models"*. More specifically, the Prosecutor establishes the special responsibility of the company if the criminal acts had been known through the communications channel and no measures had been taken.

The approval of *"Law 2/2023 of 20 February, on the protection of persons who report regulatory infringements and the fight against corruption"* - hereinafter, the Whistleblower Protection Law -, transposing European Directive 2019/1937 on the protection of persons who report Union rights, introduced into the Spanish legal system a series of requirements to be met by companies in terms of Internal Reporting Channels, which must be implemented, among others, in legal entities with more than 50 employees, as well as political parties, trade unions and business organisations and foundations created by one or the other, provided that they receive or manage public funds.

For this reason, and in order to establish a genuine culture of regulatory compliance, CHEMIEURO has implemented TARGATIS, enabling both members of the Company and third parties to report in good faith, on the basis of reasonable indications, any circumstances that may involve the materialisation of a criminal risk for the Company, as well as very serious or

serious administrative offences, or breaches and doubts about criminal risk management policies and procedures.

This Internal Reporting Channel is open to all stakeholder groups related to CHEMIEURO, listed in art. 3 of the Whistleblower Protection Act, such as: employees, former employees, trainees and volunteers; self-employed persons; shareholders and members of the management body, contractors and subcontractors; suppliers; and, in general, third parties with a direct relationship with the company.

2. TARGATIS guarantees

TARGATIS guarantees:

- the **confidentiality** of the identification data of informants and persons concerned, as well as of communications.
- the possibility of communicating information **anonymously**.
- **protection of the whistleblower**: prohibition of reprisals against both the whistleblower and persons related to the whistleblower, both natural and legal.
- **Independence, objectivity** and respect **for legality**: as it is managed by the Waterwhale law firm, the organisation will not know the identity of the whistleblower, so the process can never be flawed in terms of impartiality or retaliation against the whistleblower.
- **Filing of complaints in English, French and Spanish**.

3. Principles underlying the Internal Information System

The principles governing the Internal Information System:

- **Accessibility**: TARGATIS is easy to access through the multiple options given to the informant to make the communication.
- **Transparency**: This policy is public, as it is published on the CHEMIEURO website. In this way and through the various dissemination campaigns, all employees and third parties affected by this policy are aware of the existence of TARGATIS.
- **Confidentiality**: The identity of the informant will be treated as confidential information. Under no circumstances will Waterwhale, as the channel manager, disclose the identity of the informant to any person outside the CHEMIEURO Internal Information System Manager.

However, the details of the persons making the communication may be provided to the administrative and/or judicial authorities if they so request, stating their reasons, as a result of any procedure arising from the object of the information. Likewise, the identity of all those involved in the communication (defendants, witnesses, etc.), as well as the file and documentation to which an investigation may give rise, shall be considered confidential information.

- **Anonymity:** Anonymous reporting is allowed. In this case, the Channel manager may communicate with the anonymous whistleblower without the whistleblower having to reveal his or her identity.
- **Objectivity and Impartiality:** Once the information has been received, the right to privacy, the right to defence and the presumption of innocence of the persons affected and the object of the information shall be guaranteed.
- **Efficiency:** Acknowledgement of receipt to the whistleblower will be given within 3 working days and in any case within 7 calendar days under the Whistleblower Protection Act, provided that the investigation is not jeopardised. Waterwhale will prepare a preliminary report that will be sent to the System Manager within 7 working days from the issuance of the acknowledgement of receipt. The resolution of admission for processing will designate the Instructor of the file, which will be resolved within three months from the submission of the communication, which may be extended for a further three months.

4.- Guarantee of confidentiality

The protection of the Law shall only apply to persons who communicate information through the Internal Information Channel "Targatis", the only channel enabled by the company for the communication of information.

If the informant uses other channels not established by the organisation to communicate the information (e.g. communicating it directly to the person in charge), the persons who have knowledge of the information are obliged to maintain the confidentiality of the data to which they have access, and failure to comply with this duty of confidentiality constitutes a very serious infringement under Law 2/2023, without prejudice to breaches in labour or disciplinary matters.

The recipient of such information shall be obliged to communicate it immediately to the Head of the Internal Information System.

5. Whistleblower protection measures

Whistleblowers shall be protected against acts constituting retaliation, including threats of retaliation and attempted retaliation by CHEMIEURO.

Whistleblowers will not be protected:

- Their communication is inadmissible, that is to say:
 - o Facts lack plausibility
 - o The facts shall not constitute an infringement of the law.
 - o The communication is unfounded or the evidence has been obtained through the commission of an offence.
 - o Does not contain new information with respect to a previous communication

- Communicate information related to complaints about interpersonal conflicts;
- Communicate information which is already fully available to the public or which constitutes mere hearsay;
- Communicate information outside the reportable facts permitted by the Whistleblower Protection Act or are made on the grounds of bad faith.

6. Measures to protect those affected by the information

Those affected by the information communicated shall also be protected, guaranteeing the principle of the presumption of innocence, the right to honour and the right of defence, including the right to be heard and the right to access their file without disclosing information that may identify the informant.

The preservation of their identity and the confidentiality of the facts and data of the procedure shall also be guaranteed.

7. Data Protection

It will comply at all times with the regulations and provisions on the Protection of Personal Data, not collecting, through TARGATIS, personal data whose relevance is not evident to treat specific information.

Likewise, personal data which are not necessary for the purpose of knowledge and investigation of the infringements reported shall not be processed.

Access to personal data contained in the Internal Information System shall be limited within the scope of its competences and functions to:

- The person in charge of the system and whoever manages it directly
- The HR Manager or the duly designated competent body, only when disciplinary measures may be taken against an employee.
- Responsible for the Legal Services, should legal action be necessary.
- Data processors that may be appointed from time to time (external collaborator). In this case, Waterwhale Europe S.L.P.
- Data Protection Officer