

WHISTLEBLOWER CHANNEL

1. INTRODUCTION

Grupo Varma complies with regulations governing the protection of people who report regulatory infringements and for combatting corruption.

Employees and collaborators of Grupo Varma who suspect a breach of our Code of Ethics or detect actions or omissions which may be considered a criminal or administrative offence must report them via the Whistleblower Channel available for this purpose.

1

2. SCOPE OF APPLICATION

Any type of substantiated act which may contravene the principles and values of our Code of Ethics or involve an illegal act or one which is against the regulations in force may be reported through our Channel.

This Channel shall apply to all of the companies which make up Grupo Varma, and any individual, internal or external, who has knowledge of any of the indicated crimes, irregularities or breaches may submit a report.

3. OBJECTIVE

The main objective of our Whistleblower Channel is to facilitate the formulation, receipt and safe processing of any communication about suspicions of irregular conduct or breaches which may arise in the performance of the business activity of Grupo Varma.

Any individual who believes that a breach of our Code, policies or rules, or any other malpractice or irregular conduct has taken place may use our Whistleblower Channel as a reporting system, and the adequate protection and anonymity of the whistleblower shall be guaranteed throughout the process.

This confidential service will allow the formulation and management of the reports, although reports may also be made in person if the whistleblower so prefers.

Upon receipt and registration of the report, the Channel Manager will confirm receipt within a period of no more than seven days, thereby initiating the process for managing the report, which shall have a general deadline of three months for a response.

4. COMMUNICATIONS

On a technological level, our channel is administered by a company independent of Grupo Varma and allows for anonymous access to the same, protecting confidentiality, unless disclosure is required as a result of legal proceedings or any official investigation by the competent authorities. It permits external access from outside the corporate network and can be used by any interested party.

The existence of this channel shall be communicated to all employees and collaborators of Grupo Varma and shall be published on the Group's website. Our instant reporting system can be accessed via the following link:

<https://centinela.lefebvre.es/public/concept/1890559?access=C4XvmoBXsWNvsFLcD7aMiyfN%2BU0jb5mGAlol0htQUPQ%3D>

To ensure correct communication and improve the quality of the process, all of the required fields of the form provided for this purpose must be completed, and it is recommended to include as much detail on the reported acts as possible, with the possibility of attaching as many documents as are deemed necessary to facilitate their subsequent investigation.

This Channel must be used preferentially, without prejudice to the possibility of using other external channels for reporting to the competent authorities.

Grupo Varma guarantees the absolute confidentiality of the reports and whistleblowers, as well as compliance with the data protection regulations in force.

5. PROCEDURE

Following the corresponding communication to the whistleblower that the report has been received, the mechanisms for registering and managing the same will be put in motion, and this confirmation of receipt shall be issued within a period of no more than seven days.

The Whistleblower Channel Manager (Head of Internal Auditing of the Group) shall carry out an initial assessment of the report and if there are indications that an irregularity has been committed, they shall launch an investigation, which shall be carried out with the participation of the Supervisory Body, composed of the Managing Director of the Group company affected by the report, the Group Legal Officer and the Group Director of Human Resources. In the event that one of these individuals is implicated in the report, they shall be excluded from the management process.

The whistleblower must report in a full, substantiated and truthful manner all of the information of which they are aware in relation to the possible breaches, including all evidence or documentation which exists for the management of the report. Confidentiality shall be guaranteed throughout the process. In the event that the report is not made anonymously, the anonymity of the whistleblower shall still be respected.

Grupo Varma shall actively ensure that no acts of retaliation take place, whatever the source and subject of the report, and nor shall it permit retaliation to be taken directly or indirectly against those who have made a report in good faith through this channel.

The investigations shall take place within a maximum period of three months, with the possibility of extending this period in particularly complex cases for a maximum of an additional three months. If in the initial analysis or in the subsequent course of the investigation any event is observed which may constitute a crime, it shall be immediately reported to the competent authorities in each case.

Any attempt to obstruct an investigation or to manipulate information or evidence shall be considered a breach of the Code of Ethics which may lead to disciplinary action.

Once the investigation is complete, the Manager shall be responsible for issuing the corresponding report with details of the events investigated and supported by the corresponding evidence. This report shall be agreed with the Supervisory Body. Once the process has concluded, the Group Audit and Control Committee shall be informed to subsequently inform the Board of Directors, which is in charge of monitoring the Code of Ethics and controlling its applicability.

6. REPORTING AND DATA PROCESSING

Grupo Varma shall maintain an up-to-date record of the reports received and the investigations conducted.

During the investigation, the right of the individual under investigation to be informed of the events which are being evaluated shall be respected, and adequate communication shall be maintained with them to guarantee a successful investigation. They shall be provided with the corresponding report number and all of the necessary information regarding the purpose and processing of the data. All of the actions carried out during the process shall be duly documented. In all communications, people's rights to privacy, honour, defence and the presumption of innocence shall be guaranteed.

The information collected in the whistleblower form shall be confidential and shall only be processed by personnel authorised to do so by this regulation and with the exclusive mission of managing the report. Likewise, it shall be duly archived and stored in the system solely for the time required to decide on the convenience of launching an investigation of the facts.

The personal data processed in the investigation proceedings shall in all cases respect the regulations in force on the protection of personal data. Specifically, the General Data Protection Regulation (EU) 2016/679, Organic Law 3/2018, of 5 December, on the protection of personal data and guarantee of digital rights, as well as the specific provisions contained in Title VI of Law 2/2023, of 20 February.

All personal data contained in the communication or collected subsequently during the investigation process which is not required must be immediately deleted, particularly any special category of personal data which is not required for the investigation (for example, health or union membership data).

In the event that the communication is deemed inadmissible, the personal data shall be anonymised. If it is accredited that the information provided or part of it is not truthful, it must be immediately deleted as soon as such circumstances become known, unless said lack of truthfulness may constitute a criminal act, in which case it shall be stored for the time necessary during which the legal proceedings take place.

If three months have passed since the receipt of the communication and no investigation has been launched, the personal data shall be immediately anonymised.

The personal data contained in the internal reporting system which are not covered by any of the circumstances established in the previous paragraphs may be stored during the prescription period for possible liabilities, with a maximum storage period of ten years, in order to comply with the legal obligation to maintain a record book.

If for any reason an investigation has not been launched following the legal three-month period, the data must be deleted from the platform.

7. SANCTIONS FOR A BREACH

If as a result of the entire process described it is concluded that there has been a breach or failure to comply with the Code, this shall be sanctioned in accordance with the collective bargaining agreement or the employment regulations in force, without prejudice to any other liabilities which may derive from said conduct.

It shall be the responsibility of Grupo Varma Board of Directors to evaluate the corresponding sanction, taking as a basis the Whistleblower Report provided by the Channel Manager and the Supervisory Body.

8. UPDATING OF THE CHANNEL

Grupo Varma reserves the right to amend this regulation when necessary, and shall duly communicate any amendments which may be made.