



# Regulation

## Internal information system and Communication Channel



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## 1. Purpose and scope.

### 1.1 Regulatory framework

The purpose of this document is to regulate the **internal information system and the communications channel** enabled to prevent, detect and manage possible regulatory breaches, criminal offences or conduct contrary to the values of the Grup Voltes code of ethics, as established by Law 2/2023 of 20 February regulating the protection of people who report regulatory infringements and the fight against corruption transposing European Union Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report on Union law and whistle-blower rights.

The **communication and information** channel are integrated into the framework of the Compliance management system implemented in the company and certified with the ISO 37301 standard.

This management system covers all the companies of the group: Voltes S.L.U., Corpvoltes, S.L., Voltes Connecta, S.L.U., Simvol 4, S.L.U. and Voltransco, S.L.U.

In accordance with Organic Law 5/2010 of 22 June amending the Penal Code, legal persons are criminally liable for the offences expressly contemplated in the Law, and according to Organic Law 1/2015 of 30 March, it is mandatory to have an organization and management model that includes appropriate surveillance and control measures to prevent crimes or reduce their risk of being committed.

### 1.2 Area of application

The **communication and information** channel are open to all those reporting persons who are part of Grup Voltes or who interact with or may be affected by the activity of Grup Voltes: workers, self-employed workers, shareholders, managers, customers, suppliers, advisors, subcontractors, competing companies, entities in the territory, among others.

Through this channel, the following can be processed:

- Communications related to actions or omissions that may constitute a serious or very serious criminal offence.
- Actions contrary to the Code of Ethics of Grup Voltes, and approved internal regulations.
- Civil, commercial, administrative or tax offences.
- Complaints related to the prevention of occupational risks and occupational health and safety.
- Conduct contrary to competition law and the free market.
- Acts of corruption and bribery.
- Situations of harassment or discrimination.
- Offences against the environment.
- Protection of privacy and personal data.
- Other similar issues.

Other aspects of a labor nature or related to the services provided by the company will be managed through other corporate channels.

## 2. Competent body

Grup Voltes has designated specific functions for the management of the internal communication system. Within this management, the following are involved:

1. Responsible for the internal system and the communication channel.
2. Compliance Committee.

Section 5 specifies the functions of each of these bodies.

### 3. Communication Channels

The communication channels enabled are as follows:

				
Web form, accessible or via <a href="https://www.voltes.com/canal-de-denuncies/">https://www.voltes.com/canal-de-denuncies/</a>	comunica@voltes.com	By post, addressed to the Compliance Authority of Grup Voltes, Av La Pau nº 2 25670 Térmens	Telephone 973 180 086	In person, at our office in Térmens

### 4. Communications requirements/complaints

Communications must contain at least the following information:

- Identification of the communicating person and contact details (except in anonymous communications).
- Type of communication.
- Clear and detailed description of the breach, irregularity or reason for the communication, detailing the time of the facts, the circumstances and the group company affected.
- Identification of the person responsible for the irregularity or infraction, if known.
- Provision of documents or evidence.
- Selection of the processing and degree of confidentiality of the information provided.

Verbal communications must be documented either by a recording of the conversation or by a complete and accurate transcript of the conversation, which shall be verified and signed by the informant.

Communications or complaints will not be processed if it is impossible to verify the veracity of the communication received, if the facts reported do not constitute an infringement or if the communication has been made in bad faith.

### 5. Rights and guarantees

Grup Voltes guarantees the accessibility of the channels and an adequate, efficient, secure, confidential and independent management of any communication received, activating external resources for legal advice, investigation or mediation if necessary.

The communication channel guarantees the protection of the rights of the informant and whistleblower, as well as those of the persons affected, witnesses and respondents.

On a general level, we believe that all Grup Voltes stakeholders have the right to be informed about the existence of the channel and to use it if necessary.

## 5.1 Rights and duties of the informant

Whistleblower protection measures shall ensure confidentiality, data protection and the prevention of retaliation. These rights shall apply to information facilitators, third parties related to the complainant, co-workers or family members.

### Rights and Warranties

- **Confidentiality.** Any communication received will be treated confidentially. The identity of the informant and the affected person will be preserved at all times and their data will be processed in compliance with personal data protection regulations. The whistleblower will not be able to access the data of the whistleblower or any person involved unless they give their consent.
- **Anonymity** if you wish.
- **Right to protection of personal data** and responsible use of the data provided.
- **No retaliation.** Grup Voltes guarantees the protection of whistleblowers and undertakes not to retaliate against them. The company will not tolerate any retaliation committed against persons who have made use of the communications and information channel. The protection measures adopted by the company will be extended to natural persons related to the informant, such as co-workers or family members. If situations of threat, harassment or discrimination are reported as a result of having filed a complaint, the investigation procedure will be prioritized and sanctioned in a timely manner.
- **Information.** Except in cases where the report is anonymous, the reporting person shall have the right to be informed of the receipt and management of the communication or complaint, of the investigation process and of the final result.

### Homework

- **Act in good faith.** In the event of a communication where the reporting person is aware of the falsity of the data or facts communicated, the company will adopt the appropriate legal or disciplinary measures.
- **Provide data and documents** related to the reported facts, if available.
- **Duty of confidentiality** with respect to information generated during the process.

## 5.2 Rights of the person affected or reported

In the case of communications involving complaints or infringements against specific persons, the following rights and protection measures are defined:

- The right to be informed that they are in the process of being investigated, as a result of a complaint filed against them, which will include information on the facts denounced and the actions or omissions attributed to them and the procedure to be followed.
- Right to **be heard** at any time during the proceedings
- The right to access procedural data, with the exception of the identity of the complainant and other persons affected by the file.
- The right to be informed of the resolution or filing of the complaint.
- Right to respect for the presumption of innocence and honor.
- Right to the protection of personal data and responsible use of the data provided

## 6. Management of received communications

The process of processing and managing communications is as follows.

### Reception and processing of communications

Communications are received through one of the channels provided (point 3).

The **system manager** performs:

- It records the communication to ensure traceability and initiates the processing process.
- Within a maximum period of 7 days, it acknowledges receipt of the person who has made the communication, informs them of their rights and requests - if applicable - additional information.
- It conducts a preliminary investigation, analyzing the documentation submitted and compliance with the requirements to accept the communication/complaint or reject it.
- In the event that the processing proceeds, inform the Compliance Committee.
- If the process does not proceed, inform the person who made the communication of the closure of the process and (if applicable) alternative channels to manage their claim.

### **Investigation and resolution of the case**

The **Compliance Committee** carries out:

- Receiving the communication from the person in charge of the system.
- It processes the file within a period of 3 months, extendable to 6 months in cases of special complexity and with the guarantees established in these regulations.
- It informs the person under investigation that there is a communication or complaint against them and the rights that assist them.
- It carries out the actions deemed necessary: in-depth investigation, interviews with the parties involved and possible witnesses, documentary analysis or others.
- It energizes, if necessary, internal and external support resources: research services, legal advice or mediation practices, among others.
- In the event that the facts reported may constitute a crime, inform the prosecutor's office.
- Write a report of conclusions with information on:
  - The file number.
  - Actions carried out: Analysis of the information, documentation and allegations made in the different procedures.
  - Proven facts as a result of the investigation.
  - Resolution. Conclusions, recommendations and decisions taken.

### **Communication of the report of conclusions**

The **Compliance Committee** performs:

- Communicate the findings of the investigation to all stakeholders, including the whistleblower, the whistleblower and the management of the company.
- If it is considered that the facts denounced have been sufficiently proven and constitute an infringement, it will request the company's administrative body to apply sanctioning or disciplinary measures.

### **Information Registration**

The **Compliance Committee** performs:

- Updating and maintenance of the Record Book with the information received and details of the internal investigations carried out, guaranteeing the confidentiality requirements provided for by law. This register will not be public and its contents may be accessed only at the request of the judicial authority.

## 7. Diffusion, review and approval of the channel

The company undertakes to provide information and publicity about the internal information system and communications channel to all staff, administrators, managers and stakeholders and to publish the Regulations on the corporate website.

Likewise, in the audits of the management system and in the reports that the Compliance body periodically sends to the company's management, an analysis of the operation and effectiveness of the channel will be carried out.

These regulations are approved by the Board of Directors of Grupo Voltes and will be subject to annual reviews to update the channel or correct any deficiencies that may be detected.

## 8. Personal data protection

The company is committed to preserving the identity of the whistleblower or information facilitator. The information received and personal data will be treated confidentially and in accordance with the purposes set out in this Regulation and in compliance with Organic Law 3/2028 on the Protection of Personal Data and the Guarantee of Digital Rights, of 5 December.

Notwithstanding the foregoing, the data of the reporting person may be provided to the competent judicial or administrative authority within the framework of a criminal, disciplinary or sanctioning investigation if required by law.

The personal data provided by the informant will be processed with his/her consent and for the purpose of managing the communication channel and the investigations that derive from it. They will only be kept for the period that is necessary and proportionate for the purposes of complying with the Law and no later than three months after receipt of the communication without any investigation proceedings having been initiated.

Persons who access the communications channel through any of the channels enabled for this purpose may exercise at any time their rights of access, rectification, cancellation and opposition, limitation of processing, data portability and any other rights they may have through the email [protecciodades@voltes.com](mailto:protecciodades@voltes.com)

