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<b>Ethical Channel Usage Policy</b>					

<b>Written by:</b>	Global Legal Department		
<b>Reviewed by:</b>	Compliance and Business Ethics Committee		
<b>Approved by:</b>	Board of Directors		
<b>Date of approval:</b>		<b>Effective date:</b>	
<b>Last review:</b>		<b>Next review:</b>	2025

## I. Introduction

The companies that make up TRADEBE (hereinafter jointly referred to as "TRADEBE") have an internal mechanism for reporting possible breaches (Ethical Channel) in accordance with the provisions of Spanish Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption (hereinafter "Whistleblower Protection Act"), as well as for reporting doubts and queries regarding the interpretation and implementation of its *Compliance* Program.

### 1.1 What should be reported?


- Any breach of the Code of Ethics or other internal regulations, processes and controls that make up the TRADEBE Compliance Program.
- Any violation of the applicable legislation in force.
- Any contingency that may pose a risk to TRADEBE's reputation.
- Doubts or queries in relation to the implementation of the Compliance Program.

In any case, the content of any report made must be related to conduct or acts committed by members of TRADEBE or collaborators, suppliers, contractors, subcontractors and other third parties with whom TRADEBE is professionally related or linked.

### 1.2. Means of communication

Communications can be made through the Ethical Channel by the following means:

- Sending an email to the following address: [compliance@tradebe.com](mailto:compliance@tradebe.com)
- By accessing the channel set up for this purpose on the corporate web site ([www.tradebe.com](http://www.tradebe.com) and [www.tradebe.es](http://www.tradebe.es)).


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## II. Related Documentation

Reference	Title
-----	Code of Ethics
PO-GL-CL 02.01	Compliance Policy
PO-GL-CL 03.01	Compliance Policy - Executive Overview -

## III. Essential principles and guarantees for the use and management of the Ethical Channel

- **Confidentiality guarantee:** TRADEBE guarantees that (i) the identity of the persons making a report; (ii) the identity of any other person affected or mentioned in the report; and (iii) the actions taken, will be confidential and may not be disclosed or communicated to unauthorized persons.
- **Anonymity:** communications may be made anonymously, i.e., without the need to identify oneself.
- **Prohibition of retaliation:** TRADEBE will not adopt any kind of retaliation or negative consequence towards persons who make a report in good faith.
- **Management of the report in a diligent and impartial manner:** the report will be processed in accordance with the requirements of Spanish Law 2/2023, in an objective manner and avoiding possible situations of conflict of interest.
- **Right to make the report by means of a face-to-face meeting with one or more of the members of the Compliance and Business Ethics Committee:** it must take place within a maximum period of seven (7) calendar days from the request. The face-to-face meeting must in any case be documented (i) by a recording of the conversation or (ii) through a complete and accurate transcript of the conversation. The recording may be listened to and/or the transcript of the conversation may be verified, corrected and accepted by signature.


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- **Right to go to the Independent Authorities (external channel)** External channels may be used, where appropriate, as provided by the governmental authorities for this purpose.
- **Personal data protection rights** in accordance with European Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016, Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights and Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption.
- **Other rights in Law 2/2023**, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption.

## IV. Ethical Channel Usage Guide

Without prejudice to the guarantees and rights described in the previous section, it is important to highlight the following points regarding the use of the Ethical Channel:

- The **Ethical Channel is managed by the Head of the Ethical Channel**, this figure falls on the secretary of TRADEBE's Compliance and Business Ethics Committee, as the person responsible for promoting the management of the Ethical Channel and the diligent processing of any internal investigations.
- The following will have **access to the communications received through the Ethical Channel**: (i) the Head of the Ethical Channel and whoever manages it directly; (ii) the members of the *Compliance and Business Ethics Committee*; (iii) in the event of having to sanction, the head of the Human Resources Department; (iv) in the event of having to adopt legal measures, the head of the Legal Department, (v) where appropriate, the persons in charge of processing that may eventually be designated as, for example, consultants or managers, internal or external; and (vi) where appropriate, the data protection officer.
- The **Ethical Channel may only be used** to communicate the facts or queries referred to above (see point "What can be communicated through the Ethical Channel").
- **Misuse of the Ethical Channel** may be sanctioned in accordance with the Collective Bargaining Agreement in force and applicable labor legislation. For example, in the event of reporting false facts or in bad faith.

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- All TRADEBE members **are obliged to report any breaches** of the *Compliance* Program or applicable law that come to their attention.

## V. Protection of personal data

The personal data entered in the Ethical Channel will be processed in accordance with the provisions of European Regulation 2016/679 of April 27, 2016 on the protection of natural persons with regard to the processing of personal data ("GDPR"), Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights ("LOPDGDD") and Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption ("Whistleblower Protection Act").

Personal data not necessary for the knowledge and investigation of the reported facts will not be processed and, if necessary, will be immediately deleted.

The informant may identify himself/herself, but may also report any fact anonymously. In either case, both personal data and information will be treated confidentially.

The reporter may also identify himself/herself at a later time after the report has been made or provide additional documentation or information later in the process.


The interventions of witnesses and affected persons will be strictly confidential.

The legal basis that legitimizes the processing of personal data lies in the fulfillment of a legal obligation (Art. 6.1c) GDPR) for those companies that in accordance with the Whistleblower Protection Act must have an internal information system and in the public interest (Art. 6.1e) GDPR for those companies, which are not obliged by the aforementioned Act, but whose management body has agreed to its implementation.

The information provided through the Ethical Channel will be kept for the time necessary to decide on the appropriateness of initiating an investigation into the facts reported and, where appropriate, for the additional period necessary to comply with applicable legal or internal regulations.

In any case, access to the data contained in the Ethical Channel will be limited to TRADEBE's internal and external persons as strictly necessary.

In accordance with the applicable regulations, both the informant and the persons involved in the communicated facts have the right to receive information about the processing of their

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personal data, to access them, to rectify them, if necessary to have them deleted or to limit the processing, to oppose the processing of them and to the portability under certain assumptions.

To access complete information on the processing of personal data carried out in the Ethical Channel, please consult the Privacy Policy of the Ethical Channel.

## VI. Review and update

This Policy will be reviewed and updated every two years.