

POLICY ON THE INTERNAL INFORMATION SYSTEM

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1. PURPOSE OF THE POLICY OF INTERNAL INFORMATION

FAES FARMA, S.A. and its group of companies (hereinafter collectively referred to as “FAES FARMA” or “the FAES Group”), within the framework of its Corporate Compliance system and in accordance with the provisions of Law 2/2023 of 20 February, regulating the protection of persons reporting regulatory breaches and the fight against corruption (hereinafter the “Whistleblower Protection Act”), has implemented an internal reporting system so that any member of the FAES Group or any third party outside the Group who is aware of or suspects a regulatory breach may report it internally, either by name or anonymously.

The internal reporting system can also be used to submit internal enquiries regarding the regulations applicable to FAES FARMA.

FAES FARMA fully endorses all the principles set out in Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and in the Whistleblower Protection Act, and, in order to emphasise this commitment, adopts this *Internal Reporting System Policy*, the provisions of which complement those set out in the *Procedure for the Management, Investigation and Response to Communications Received through the Internal Reporting System* (“GIR Procedure”).

The purpose of this Policy is to set out the general principles of FAES FARMA’s internal reporting system, the rights of whistleblowers, and the procedure governing how matters relating to the areas referred to in the following section on the scope of application may be brought to the attention of the person responsible for the system.

2. SCOPE OF APPLICATION

This Policy offers the highest level of protection to individuals who report:

1. Acts or omissions that may constitute a breach of European Union law, as defined by the Whistleblower Protection Act.
2. Acts or omissions that may constitute a serious or very serious criminal or administrative offence. In any event, this shall be understood to include all serious or very serious criminal or administrative offences that result in financial loss to the Treasury and the Social Security system.

In addition, the internal reporting system may also be used for the following purposes, although in such cases neither the whistleblower nor the report will be entitled to the protection afforded by the Whistleblower Protection Act and this Policy:

3. The reporting of acts or omissions that may constitute a breach of Grupo FAES's internal regulations (provided they do not constitute a breach of European Union law or a serious or very serious criminal or administrative offence).
4. The referral of any enquiries relating to the scope, compliance with and interpretation of the Corporate Compliance Framework and the applicable internal regulations at FAES FARMA.

Consequently, communications relating to strictly employment-related matters or human resources policies (career development, remuneration, holidays, etc.) or those related to professional performance. In such cases, the matter will be referred, where appropriate, to the Human Resources Department.

Furthermore, the procedure for reporting incidents via the internal reporting system must not be used to report events that pose an immediate threat to life or property. Where emergency assistance is required, the situation must be reported to the emergency services.

3. SCOPE OF APPLICATION

This Policy applies not only to the directors, managers and employees of Grupo FAES, but also to other associates such as volunteers, interns, trainees, candidates undergoing the recruitment process, former employees and employee representatives, as well as any person working for or under the supervision and direction of contractors, subcontractors and suppliers, and to the shareholders of Grupo FAES.

The protective measures set out in this Policy shall also apply, where appropriate: (i) to individuals who, within the organisation where the whistleblower works, assist the whistleblower in the process; (ii) to individuals who are connected to the whistleblower and who may suffer reprisals, such as the whistleblower's colleagues or family members; and (iii) to legal entities for which the whistleblower works, with which they have any other type of relationship in a work context, or in which they hold a significant interest.

In addition, FAES FARMA's internal reporting system may also be used by FAES FARMA's customers who become aware of or suspect any regulatory non-compliance, and they will be subject to the level of protection expressly provided for by the Whistleblower Protection Act in relation to such cases.

4. OBLIGATION TO REPORT BREACHES

Any member of FAES FARMA or third party who has dealings with the FAES Group in the course of their professional duties (as set out in the previous section of this Policy) and who becomes aware of any breach committed in a work or professional context may immediately report it via the internal reporting system, without fear of any form of reprisal (for those who are part of the FAES Group, this constitutes an obligation).

5. FUNCTION OF THE OF INTERNAL INTERNAL INFORMATION

The Board of Directors has appointed the Ethics Committee as the body responsible for the internal reporting system, comprising:

- Chief Executive Officer, who will act as Chair.
- Chief Finance Officer.
- Chief People Officer.
- Chief Internal Audit and Compliance Officer.

All of them provide adequate guarantees of independence, confidentiality, data protection and the secrecy of communications.

The aforementioned body has decided to delegate to the Chief Internal Audit and Compliance Officer the specific powers to manage the internal reporting system and process reports.

6. INTERNAL REPORTING CHANNELS

FAES FARMA has set up a secure, internal channel for confidential reporting that complies with the strictest regulations regarding whistleblower protection and data protection. This channel is managed via the EQS INTEGRITY LINE platform and can be accessed via:

- The FAES FARMA corporate website: <https://faesfarma.com/sobre-faes-farma/canal-de-denuncias/>
- 's intranet corporate website: <https://intranet.grupofaes.com/canal-de-denuncias>

In addition, the whistleblower may request that the person responsible for the system arrange a face-to-face meeting to present the report verbally; such a meeting must take place within a maximum of seven days of the request. The meeting must be duly documented in one of the following ways:

- By recording the conversation in a secure, durable and accessible format – after informing the whistleblower that the communication will be recorded and advising them of the processing of their data in accordance with current regulations – or
- Through a complete and accurate transcript of the conversation prepared by the staff responsible for handling it. In addition, the whistleblower will be given the opportunity to review, correct and sign to confirm the transcript of the conversation via the EQS INTEGRITY LINE platform.

Furthermore, reports may be made either anonymously or by providing identification.

Reports submitted should, as far as possible, include the following details:

- i. The full name(s) of the person(s) to whom the acts and/or conduct referred to in the report are attributed.
- ii. Date of the events and as much information as possible about them.
- iii. Any documents or other evidence in your possession that may substantiate the facts and/or conduct that are the subject of the report.

Notwithstanding the above, any formal communication from a judicial body or a public authority shall be considered a valid means of becoming aware of a breach.

In the event of a conflict of interest, that is, if the person responsible for the reported incidents is a member of the body responsible for the internal reporting system, the whistleblower may address the report to any of the other members of that body, and may rest assured that the person implicated in the reported incidents will be excluded from the investigation process and from any decision-making in this regard.

7. EXTERNAL CHANNEL FOR REPORTING AND PUBLIC DISCLOSURE

Notwithstanding the fact that the internal reporting channel is the preferred means of reporting acts and omissions constituting infringements of European Union rights, or serious or very serious criminal or administrative offences, any natural person may report directly to the external reporting channel established in Spain by the Independent Whistleblower Protection Authority, A.I.I. – and the competent regional authority, where applicable –.

Furthermore, the public disclosure or making available to the public of information regarding acts or omissions falling within the scope of this Policy shall also entail protection for the whistleblower, provided that they have first reported the matter through internal or external channels, or directly through external channels, without appropriate action having been taken within the specified timeframe, and provided that the requirements set out in the following section are also met.

8. PROTECTION OF WHISTLEBLOWERS

Individuals who report or disclose breaches shall be entitled to all the protection rights provided for in this Policy and in the *GIR Procedure*, provided that:

- They have reasonable grounds to believe that the information they report to FAES FARMA is true at the time of reporting, and that such information falls within the material scope of the Policy.
- They have made the report or disclosure in accordance with the requirements set out for that purpose by FAES FARMA and this Policy.

Any person who has reported or disclosed information regarding acts or omissions covered by this Policy anonymously, but who has subsequently been identified and meets the conditions set out in this section, shall be entitled to the protection provided for in this Policy.

Persons who report infringements falling within the scope of Directive (EU) 2019/1937 to the relevant institutions, bodies or agencies of the European Union shall be entitled to protection in accordance with the provisions of this Policy.

Conversely, persons who communicate or disclose the following shall not be entitled to the protection provided for in this Policy:

1. Information contained in communications that have been rejected for any of the following reasons:
 - a. Where the facts described lack any plausibility.
 - b. Where the facts reported do not constitute a breach of the law falling within the scope of the Policy.
 - c. Where the report is manifestly unfounded or, in the opinion of the person responsible for the system, there are reasonable grounds to believe that it was obtained through the commission of a criminal offence. In the latter case, in addition to the report being rejected, a detailed account of the facts deemed to constitute a criminal offence shall be forwarded to the Public Prosecutor's Office.

- d. Where the report does not contain new and significant information regarding infringements that were the subject of a previous report in respect of which the relevant proceedings have been concluded, unless there are new factual or legal circumstances that justify further action. In such cases, the person responsible for the system shall notify the decision, stating the reasons.
2. Information relating to complaints about interpersonal conflicts or which affects only the whistleblower and the persons to whom the report or disclosure refers.
3. Information that is already fully available to the public or that constitutes mere rumours.
4. Information relating to acts or omissions that do not fall within the scope of this Policy.

The informant will be notified if the report submitted via the designated channels is not accepted, unless the report was anonymous or the informant has opted out of receiving communications regarding the procedure.

9. PROHIBITION OF RETALIATION

FAES FARMA will take the necessary measures to prohibit any act constituting retaliation, including threats of retaliation and attempts at retaliation, against whistleblowers.

Retaliation is understood to mean any acts or omissions that are prohibited by law, or which, directly or indirectly, result in unfavourable treatment solely because of a person's status as a whistleblower, or because they have made a public disclosure. By way of example only, the following are considered to constitute retaliation:

1. Suspension of the employment contract, dismissal or termination of the employment or statutory relationship.
2. Early termination or cancellation of contracts for goods or services.
3. The imposition of any disciplinary measure, demotion or refusal of promotion, and any other substantial change to working conditions.
4. Failure to convert a fixed-term employment contract into a permanent one, where the worker had legitimate expectations that they would be offered permanent employment.

5. Damages, including reputational damage, or financial loss, coercion, intimidation, harassment or ostracism.
6. Negative assessments or references regarding work or professional performance.
7. Inclusion on blacklists or the dissemination of information within a specific sector, which hinders or prevents access to employment or the awarding of contracts for works or services.
8. Refusal or revocation of a licence or permit.
9. Refusal of training.
10. Discrimination, or unfavourable or unfair treatment.

The measures set out in points 1 to 4 above shall not be considered retaliation when they are carried out in the normal exercise of managerial authority under labour legislation, due to proven circumstances, events or infringements, and unrelated to the submission of the report.

It is also hereby made clear that any acts intended to prevent or hinder the submission of reports and disclosures, as well as those constituting retaliation or resulting in discrimination following such submission, shall be null and void and shall give rise, where appropriate, to disciplinary or liability measures, which may include the payment of damages to the aggrieved party.

Furthermore, whistleblowers may, where applicable, have access to the support measures provided in Spain by the Independent Whistleblower Protection Authority and/or an independent autonomous body.

10. MEASURES TO PROTECT AGAINST RETALIATION

The FAES Group will take the necessary measures to ensure that whistleblowers are protected against retaliation. The main protective measures provided for in both Directive (EU) 2019/1937 and the Whistleblower Protection Act are set out below:

1. Persons who disclose information regarding the acts or omissions referred to in paragraphs 1 and 2 of section 2 of this Policy, or who make a public disclosure, shall not be deemed to have breached any restriction on the disclosure of information, and they shall not incur liability of any kind in connection with such communication or public disclosure, provided that they had reasonable grounds to believe that the communication or public disclosure of such information was necessary to reveal an act or omission under this Policy. This provision shall not affect criminal liabilities.

The provisions of the preceding paragraph apply to the disclosure of information by employees' representatives, even where they are subject to legal obligations of confidentiality or non-disclosure of confidential information. This is without prejudice to any specific protection rules applicable under labour law.

2. Whistleblowers shall not be held liable for the acquisition of or access to information that is communicated or disclosed publicly, provided that such acquisition or access does not constitute a criminal offence.
3. Any other potential liability on the part of whistleblowers arising from acts or omissions that are not related to the reporting or public disclosure, or that are not necessary to disclose a breach, shall be enforceable in accordance with the applicable regulations.
4. In proceedings before a court or other authority concerning harm suffered by whistleblowers, once the whistleblower has reasonably demonstrated that they have made a report or a public disclosure and that they have suffered harm, it shall be presumed that the harm was caused as a form of retaliation for making a report or a public disclosure. In such cases, it shall be for the person who took the prejudicial measure to prove that that measure was based on duly justified grounds unrelated to the communication or public disclosure.
5. In legal proceedings, including those relating to defamation, copyright infringement, breach of confidentiality, breach of data protection regulations, disclosure of trade secrets, or claims for compensation based on employment or statutory law, individuals who make a report in accordance with this Policy shall not incur any liability whatsoever as a result of such reports or protected public disclosures. Such persons shall be entitled to raise as a defence in the context of such legal proceedings that they made a communication or public disclosure, provided they had reasonable grounds to believe that the communication or public disclosure was necessary to bring an infringement to light.

11. PROTECTIVE MEASURES FOR INDIVIDUALS REFERRED TO IN THE REPORT

FAES FARMA will ensure that the persons concerned by the communication are heard as part of the internal investigation, and are entitled to the presumption of innocence, the right of defence and the right of access to the file in accordance with the provisions of current legislation.

Furthermore, the identity of the person who is the subject of the report of an infringement shall be protected and treated as confidential, as shall the facts reported, in the same way as the identity of the whistleblower themselves; this is subject to any exceptions that may be necessary to ensure the successful completion of the investigation or the eventual referral to the competent authorities.

12. SANCTIONS

The sanctions that may be imposed in each case shall be those provided for in the Workers' Statute, in the applicable collective agreement or in the relevant labour legislation, and shall be determined according to the seriousness of the acts committed, taking into account circumstances such as the damage or harm caused, the circumstances of any victims, and so on. Measures in addition to disciplinary action may also be taken, including filing the relevant claims or reporting the facts to the relevant administrative, police or judicial authorities.

In addition to potential breaches of employment discipline and disciplinary sanctions, the Independent Whistleblower Protection Authority may impose fines of up to €300,000 for conduct such as the following:

1. Preventing or attempting to prevent communications from being made, or obstructing or attempting to obstruct their follow-up.
2. Taking retaliatory measures against whistleblowers.
3. Initiating abusive proceedings against whistleblowers.
4. Failing to fulfil the duty to maintain confidentiality regarding the identity of the whistleblower or of the persons involved in the report, as well as the duty of secrecy regarding any information related to the report made.
5. Communicating or publicly disclosing information knowing it to be false.

13. CONFIDENTIALITY

FAES FARMA guarantees the confidentiality of the identity of the whistleblower and of any third party mentioned in the report, as well as the confidentiality of the actions taken in the handling and processing of the report, and ensures data protection by preventing access by unauthorised personnel.

Consequently, access to data relating to communications is restricted to members specifically authorised by FAES FARMA to receive, monitor or handle the communications received, as well as to third parties (for example, a judicial authority, the Public Prosecutor's Office or the competent administrative authority) where this constitutes a necessary and proportionate obligation imposed by applicable legislation, in the context of an investigation carried out by national authorities or within the framework of legal proceedings, and, in particular, where disclosure is intended to safeguard the right of defence of the data subject.

In any event, except in the cases provided for, FAES FARMA guarantees that no unauthorised person will be made aware of the whistleblower's identity or of any other information that might help to deduce their identity, either directly or indirectly. Specifically, FAES FARMA guarantees that the person to whom the reported facts relate will under no circumstances be informed of the identity of the whistleblower or, where applicable, of the person who made the public disclosure.

Furthermore, FAES FARMA will ensure that the confidentiality of the data and information provided is safeguarded in cases where reports are submitted via reporting channels other than those established, or to staff members not responsible for processing such information. To this end, FAES FARMA has provided its staff with appropriate training in this area and has warned them of the consequences of breaching the duty of confidentiality; furthermore, it has established the obligation for the recipient of the report to forward it immediately to the person responsible for the system.

In accordance with the above, FAES FARMA has implemented technical and organisational measures within its internal systems to protect the identity and ensure the confidentiality of data relating to the individuals concerned and any third parties mentioned in the information provided, particularly the identity of the whistleblower should they have been identified.

With regard to those affected by the disclosure, Grupo FAES guarantees that, throughout the processing of the case, those affected by the disclosure will be entitled to the same protection afforded to whistleblowers, with their identity being protected and the confidentiality of the facts and details of the proceedings being guaranteed.

For their part, those who receive public disclosures are subject to the same obligations described above and, under no circumstances, shall they obtain data that would allow the identification of the whistleblower; they must also have adequate technical and organisational measures in place.

Disclosures made under this section shall be subject to the safeguards laid down in the applicable legislation; in particular, the whistleblower shall be informed before their identity is disclosed, unless such disclosure would jeopardise the investigation or legal proceedings. When the competent authority notifies the whistleblower, it shall provide them with a written explanation of the reasons for disclosing the confidential information in question.

In any event, FAES FARMA will ensure that the competent authorities receiving information on infringements that includes trade secrets do not use or disclose such information for purposes going beyond what is necessary for the proper handling of the proceedings.

14. DATA PROTECTION

Personal data processed in accordance with this Policy, including the exchange or transfer of personal data with the competent authorities, will be processed by FAES FARMA, S.A., with registered office at Avda. Autonomía 10, 48940 Leioa (Vizcaya), and, where applicable, by the subsidiary of FAES FARMA, S.A. to which it belongs, acting as joint controllers in accordance with the provisions of the regulations on the protection of personal data (the “Joint Controllers”).

FAES FARMA has appointed a Data Protection Officer who may be contacted by data subjects viargpd@faesfarma.com.

Personal data provided via the internal system will be processed for the purpose of receiving and analysing the reported actions or omissions and, where appropriate, deciding whether to launch an investigation into the reported incidents. In addition, certain information may be processed to provide evidence of the system’s operation. In the latter case, Grupo FAES guarantees that the information stored as evidence will be anonymised.

Should any information be received that is not necessary for the processing and investigation of the acts or omissions referred to in the second paragraph of this Policy, the Joint Controllers shall proceed to delete it immediately. Likewise, all personal data that may have been disclosed and that relates to conduct not falling within the scope of the Whistleblower Protection Act and this Policy shall be deleted, as shall any information, or part thereof, that is proven to be untrue, unless such lack of truthfulness may constitute a criminal offence.

The joint controllers will process the personal data provided by the whistleblower in compliance with a legal obligation, specifically in accordance with the Whistleblower Protection Act. Furthermore, the processing of special categories of personal data may be carried out by the controller on grounds of substantial public interest, in accordance with Article 9(2)(g) of Regulation (EU) 2016/679.

Personal data collected through internal channels will be retained in accordance with the provisions of applicable legislation. Specifically, this data will be retained only for the time strictly necessary to decide whether to initiate an investigation into the reported incidents; in any event, this period may not exceed three months from the date the report was received. However, should it be necessary to process personal data for a longer period in order to continue the investigation or, where applicable, because it is deemed necessary to initiate appropriate legal proceedings, the data will be retained, in a system separate from the internal channels, for as long as necessary to conclude the investigation or for FAES FARMA to take the relevant action.

In order to fulfil the purposes described above, the Joint Controllers may grant access to personal data to:

1. Third-party companies providing services, such as external consultants and collaborators who provide support in the management or, where applicable, investigation of communications received through internal channels.
2. Those areas or departments relevant to the processing of the communication and, where applicable, to the investigation and any measures to be taken regarding the reported conduct, provided that this is necessary.
3. Similarly, personal data may be disclosed to judges and courts, the Public Prosecutor's Office, and the relevant public authorities as a result of any investigation that may be launched.

In this regard, the Joint Controllers inform data subjects that, since the controller of the internal reporting system is based in Spain and, consequently, the information provided via the internal reporting channel is received in that country, their data may be transferred to third countries outside the European Economic Area where the FAES FARMA Group subsidiary to which the data subject belongs is located, for the purpose of forwarding the information gathered through the ethics channels to the subsidiaries where the reported incidents occurred. In such cases, the Joint Controllers will adopt the necessary safeguards to ensure appropriate protection of personal data. If the data subject has any queries or wishes to obtain further information regarding the international transfer of their data, they may contact FAES FARMA at the following address: rgpd@faesfarma.com .

Furthermore, the data subject is informed that, subject to the conditions set out in the applicable legislation, they may exercise the rights recognised under data protection legislation by sending a letter, addressed to the Data Protection Officer, to the company's registered office, or by email to the following address: rgpd@faesfarma.com .

However, FAES FARMA wishes to inform you that, should the person to whom the facts described in the communication or the public disclosure relate exercise

the right to object, it shall be presumed, unless there is evidence to the contrary, that there are compelling legitimate grounds justifying the processing of their personal data.

Without prejudice to the rights to which the whistleblower is entitled under data protection legislation, should the report have been made verbally, FAES FARMA offers the opportunity to verify, correct and sign off on the transcript of the conversation via the EQS INTEGRITY LINE platform.

Furthermore, data subjects have the right to lodge a complaint with the Spanish Data Protection Agency (www.aepd.es).

The person responsible for the system will periodically review the proper functioning of the internal reporting system and the provisions of this Policy.

15. BASIC PRINCIPLES OF THE GIR PROCEDURE

The *GIR Procedure* is governed by the following principles, which shall be observed during the processing of any case:

- **Confidentiality:** The *GIR Procedure* shall ensure the confidentiality of the identity of the whistleblower, of any third party mentioned in the report, and of the details relating to the reported incident, except where such information is disclosed to the judicial authorities, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or sanctioning investigation.
- **Impartiality:** The person responsible for the system must, in all cases, be guided by the principle of impartiality, treating all reports equally, regardless of the individuals involved, and avoiding any form of conflict of interest.
- **Independence of the person responsible for the system:** The person responsible for the system shall enjoy full independence and autonomy to decide on the procedures they deem necessary to clarify the facts reported, always seeking the truth.
- **Documentation:** Each report shall give rise to a file, in which the system administrator shall include detailed documentation of the entire investigation procedure.
- **Good faith:** The provisions of the *GIR Procedure* and this Policy shall be interpreted in accordance with the principles and requirements of good faith.

16. REGISTER OF REPORTS

FAES FARMA will keep a record of all communications and enquiries it may receive via the internal information system, compiled in a so-called “logbook”, complying at all times with the established confidentiality requirements, and for the period strictly necessary and proportionate to comply with the relevant legal and regulatory requirements of the European Union.

ANNEX I. APPROVAL AND AMENDMENTS

Version number	2
Responsible	System Manager
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