Ethics Channel Use Policy

MOVENTIA GROUP (hereinafter, MOVENTIA or the Group, as the case may be) has established an internal mechanism for the notification of potential non-compliance (Ethics Channel) in accordance with the provisions of Spanish Law 2/2023 of 20 February, regulating the protection of persons who report regulatory breaches and in the fight against corruption, as well as for consultations and questions relating to the interpretation and application of its Compliance System.

The purpose of this Ethics Channel Use Policy is to explain to potential whistleblowers what this Ethics Channel entails, what types of communications can be made through it, and its main principles and essential guarantees for use and management.

What can be reported via the Ethics Channel?

- ✓ Any breach of the Code of Conduct or of the other internal regulations, processes and controls that make up MOVENTIA's Compliance System.
- ✓ Any breach of applicable law.
- ✓ Any contingency that could pose a risk to MOVENTIA's reputation.
- ✓ Any queries or concerns regarding the application of the Compliance System.

In any case, the content of the communication must relate to conduct or facts committed by collaborators or commercial agents, suppliers, contractors, subcontractors and other third parties with whom MOVENTIA is professionally associated or linked, or to doubts regarding the Compliance System.

In line with the foregoing, it should be noted that the Group's Ethics Channel does not, under any circumstances, constitute the appropriate medium for reporting facts relating to:

- ✓ Interpersonal conflicts or organisational or business management complaints, or other matters related to HR management.
- ✓ Quality issues.
- ✓ Complaints made by clients.
- ✓ Any other conduct that does not constitute a criminal offence or an administrative breach.

Therefore, MOVENTIA reserves the right not to process communications relating to matters excluded from the scope of application of its Ethics Channel, in accordance with the provisions of Law 2/2023.

What is the Ethics Channel?

The MOVENTIA Ethics Channel is a specially enabled platform which can be accessed via the corporate website and the following link: https://moventia.edenuncias.com/.

Essential principles and guarantees for the use and management of the Ethics Channel

- ✓ **Confidentiality guarantee**: MOVENTIA guarantees that (i) the identity of the person making a communication; (ii) the identity of any other person affected by or mentioned in the communication; and (iii) the actions taken, will be kept confidential and will not be disclosed or communicated to unauthorised persons.

- ✓ **Anonymity**: communications may be made anonymously, if desired, without the need to identify yourself. Anonymous communications will be handled, as far as possible, in the same way as named communications, although anonymity may

hinder the investigation and, in some cases, lead to a case being closed for lack of sufficient information.

- ✓ **No-retaliation policy**: MOVENTIA will not take any form of reprisal or negative action against individuals who make a communication in good faith.

- ✓ **Information and deadlines**: the reporter will receive an acknowledgement of receipt within a maximum of seven (7) calendar days from the moment the report is received on the Ethics Channel, unless doing so would jeopardise the confidentiality of the communication. Furthermore, the maximum response time for the investigation shall not exceed three (3) months from receipt of the communication, or from the expiry of the seven (7) day period following its submission if an acknowledgement of receipt has not been issued. In cases of particular complexity, the period may be extended by up to a further three (3) months.

- ✓ **Management of the communication in a diligent and impartial manner**: the communication will be processed in accordance with the requirements of Law 2/2023, in an objective manner and avoiding potential conflicts of interest.

- ✓ **Right to make the communication in person with the Head of the Ethics Channel**: this must take place within a maximum of seven (7) calendar days of the request. The face-to-face meeting must in any case be documented (i) by recording the conversation or (ii) by means of a complete and accurate transcript of the conversation. The recording may be listened to and/or the transcript of the conversation may be checked, corrected and accepted by signature.

- ✓ **Right to approach Independent Authorities (external channel)** through the mechanisms available to them.

- ✓ **Rights in relation to personal data protection** in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, in Organic Law 3/2018, of 5 December, Personal Data Protection and Guarantee of Digital Rights, and in Law 2/2023 of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

- ✓ **Other rights set out in Law 2/2023** of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption. These rights include, among others, the following:

    - To maintain communication with the whistleblower and, if necessary, request additional information from them.

    - The right of the person against whom the complaint is made to be informed of its existence and to be heard at any time.

    - The right of the person against whom the complaint is made to be presumed innocent, and therefore not be sanctioned or penalised until the investigation has concluded.

Ethics Channel usage guide

Without prejudice to the warranties and rights described in the preceding section, it is important to highlight the following points regarding the use of the Ethics Channel:

- ✓ The Ethics Channel is managed by the Ethics Channel Manager, the Head of Human Resources.

- ✓ The following will have access to communications received through the Ethics Channel: (i) the Ethics Channel Manager and who manages it directly; (ii) the members of the Compliance Committee; (iii) where sanctions are to be imposed, the Head of Human Resources or the person or body competent to take disciplinary action; (iv) in the event of having to take legal action, the Legal Director; (v) where applicable, the data processors that may be appointed, such as internal or external advisors or managers; and (vi) where applicable, the Data Protection Officer.

- ✓ The Ethical Channel may only be used to report the facts or queries (see the section 'What can be reported via the Ethical Channel?').

- ✓ Misuse of the Ethical Channel may be subject to sanctions. For example, in the event of reporting false or malicious information.

- ✓ All MOVENTIA members are obliged to report any breaches of the Compliance System or applicable legislation of which they become aware.

Rights in relation to the protection of personal data

1. Data Controller

Identity: MARFINA, S.L.

Registered office: Passeig del Comerç 100, 08203 – Sabadell, Barcelona (Spain)

CIF: B59372755

Telephone: +34 935 61 20 00

2. Purpose of processing

The personal data provided in the communication will be processed for the purpose of handling and analysing the communication, investigating the reported facts and taking appropriate corrective measures, whether disciplinary or contractual, to comply with MOVENTIA's due diligence and control.

3. Categories of personal data

The personal data that MOVENTIA will process are those provided by the reporter through the communication, as well as any other data that may be collected as a result of the investigation that may be launched in accordance with the procedure indicated for MOVENTIA's Ethical Channel.

4. Anonymity and Confidentiality

The reporter may identify themselves but may also report any matter anonymously. In either case, both personal data and the information will be treated as confidential.

Although the communicator's identification is not mandatory and they may choose not to provide their identification or contact details, this may help to ensure the successful investigation. The communicator may also identify themselves at a later stage after making the communication or provide additional documentation or information at a later point in the process.

The interventions of witnesses and affected parties will be treated in the strictest confidence.

5. Legitimacy

The basis for MOVENTIA's processing of the data of interested parties is the public interest (Art. 6.1.e GDPR) and compliance with a legal obligation (Art. 6.1.c GDPR).

6. Retention

The data will be retained for as long as is necessary to decide on the appropriateness of initiating an investigation into the reported facts and, where applicable, for the additional period required to comply with applicable legal or internal regulations.

The data of the person making the communication and of all parties involved will be retained in the Ethics Channel only for the time necessary to decide whether to initiate an investigation into the reported facts, which will in no case exceed three (3) months from the date the communication was sent. Once this maximum period has elapsed, they will be deleted from the Ethics Channel, without prejudice to their retention and processing by the investigation team to carry out the investigation.

After deletion, the data will be blocked for the periods provided for by law.

7. Disclosure of data

a) Authorities that may intervene in the investigation or possible legal proceedings.

b) Persons who may be involved in the investigation itself

c) State Security Forces and Bodies and competent Courts.

d) Third parties on which MOVENTIA may rely to manage the Ethics Channel, for example: data hosting platforms, the tool that supports the Ethics Channel, individuals to whom the investigation may be delegated in detail, lawyers or other types of advisors, among others.

8. Exercise of rights

a) Rights of the whistleblower: At any time the whistleblower may exercise their rights of access, rectification, erasure, objection, restriction and portability in respect of the personal data they have provided, by post to the address indicated or by email to: protecciondedatos@moventia.es providing a copy of their ID card or equivalent document, and identifying themselves as a user of the Ethical Channel service.

b) Rights of the person involved in the reported facts: The right to be informed, as soon as possible, that they are the subject of an investigation resulting from a communication concerning them or their conduct. The communication shall contain the following minimum information: the body responsible for its management, the reported facts, the rights to which they are entitled and the procedure for processing the communication, as well as all information relating to the processing of their data as listed in the previous section. Right of access to the recorded data, except for the identity of the whistleblower and other persons affected by the case file, and the right to rectification of personal data that is inaccurate or incomplete. You shall also have the right to be informed of the resolution or closure of the alert, where applicable. Where notification to the

person involved in the reported facts, as a result of whom the communication has been made, would jeopardise MOVENTIA's ability to investigate or gather evidence effectively, due to the risk of destruction or alteration of evidence by the person affected by the communication, MOVENTIA may delay this duty of notification.

Should they consider their right to data protection to have been breached, any of them may lodge a complaint with the Spanish Data Protection Agency (www.aepd.es).