

# CHANNEL COMPLIANCE POLICY

FERRETERÍA Y  
PRENSAS,  
S.A.

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# 1

## INTRODUCTION

The present Policy, approved by the management body of Ferretería y Prensas, S.A. (hereinafter referred to as "FEPRE" or "the Organization"), in accordance with the provisions of Law 2/2023, aims to establish the essential principles of the Compliance Channel.

With the implementation of the Compliance Channel, FEPRE:

i) **Enables a channel** through which the commission of acts or behaviors that occur within the Organization or in the actions of third parties contracting with FEPRE, which are contrary to national regulations and/or European Union law, can be reported, even anonymously.

ii) **Ensures the protection of well-intentioned informants** who use said Channel to report legal violations within the framework of the professional relationship.



Likewise, through the Compliance Channel, FEPRE:

- i) **Commits to the proper functioning** of public and private institutions and
- ii) **Drives investigations into actions contrary to national regulations and European Union law** of which it has become aware through the Channel.



## 2

# SCOPE OF APPLICATION

This policy affects both FEPRE members and their stakeholders.

In this sense, all members of FEPRE will be responsible for reporting through the Compliance Channel any non-compliance or violation of national regulations, limited to criminal offenses and serious or very serious administrative offenses, as well as violations of European Union law.



**Members of FEPRE:** Employees, Contracted workers and temporary workers volunteers and interns, members of the management, directors, and administrative body.

Stakeholders or interested parties may also report any regulatory violations through FEPRE's Compliance Channel

**Stakeholders:** Clients, suppliers, business partners, contractors, subcontractors, etc.

any violation national and/or European regulations that have occurred or may occur within the Organization in the context of the professional relationship.

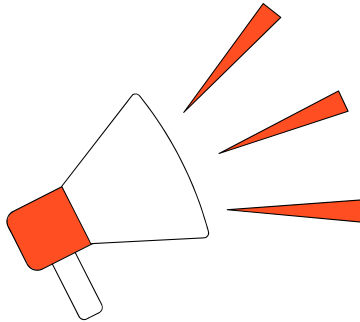
# 3

## ENABLES CHANNELS

### INTERN CHANNEL

Both members and stakeholders of FEPRE can report/communicate violations or irregular practices of national and international laws, of which they become aware due to their employment or professional relationship, through the internal channel provided by FEPRE, accessible through the organization's homepage.

<https://www.fepre.com/company/>



### EXTERNAL CHANNELS

In addition to the internal channel provided by the Organization, both members and stakeholders of FEPRE can report such violations through:

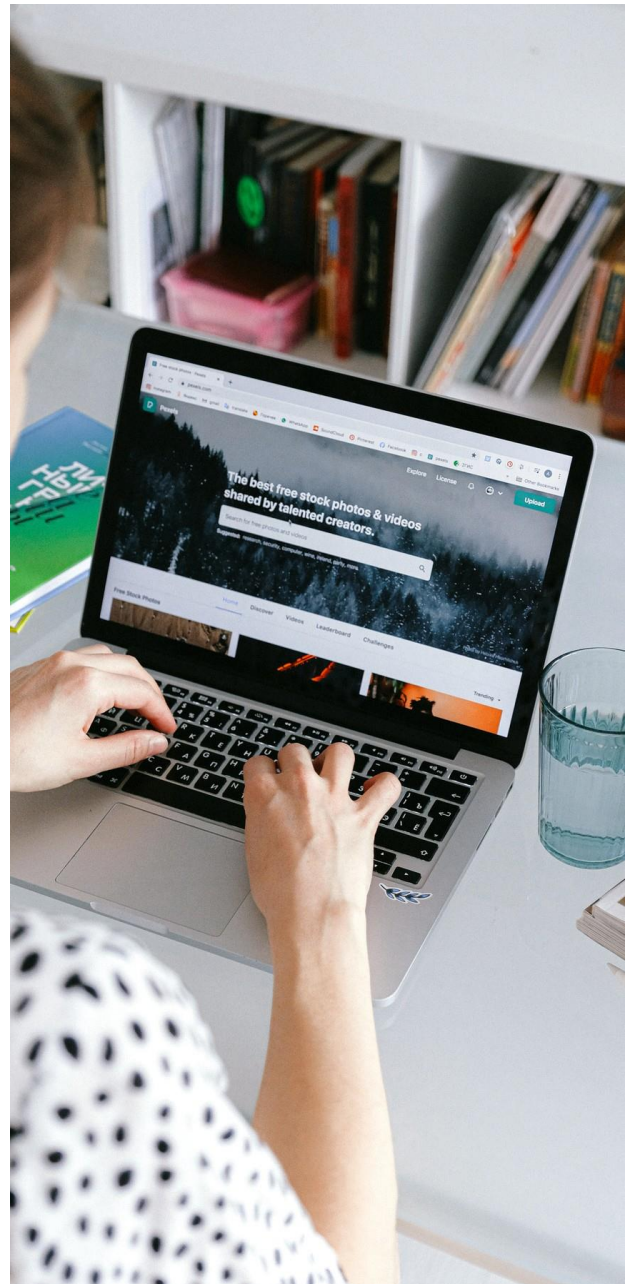
- i) The external channel managed by the Independent Authority for Whistleblower Protection.
- ii) Through the regional bodies or authorities provided for in Law 2/2023, of February 20, regulating the protection of individuals who report regulatory violations and the fight against corruption.

# 4

## VIOLATIONS SUBJECT TO REPORTING

Through the channels provided for this purpose, and preferably through the internal channel accessible on the homepage of the FEPRE website, the following can be reported:

- Actions or omissions that may constitute violations of European Union law.
- Actions or omissions that may constitute serious or very serious criminal or administrative offenses. In any case, all those serious or very serious criminal or administrative offenses that involve financial loss to the Public Treasury and Social Security will be understood to be included.



**Commercial claims will not be accepted** through the Compliance Channel.

## 5

## FORM AND CONTENT OF THE COMMUNICATION

The communications made through the Compliance Channel will be:

- ◆ In writing.
- ◆ Anonymous or nominative.
- ◆ Confidential.
- ◆ In good faith.



The communications must contain, at least, the following information:

- ◆ Detailed description of the facts constituting the infringement.
- ◆ Identification of the person(s) reported.
- ◆ Date and time when the irregular or illegal conduct occurred.
- ◆ Location.
- ◆ Area of activity.
- ◆ Whether it is recurring or not
- ◆ Indicating whether there are any witnesses.
- ◆ Aportar las pruebas, de haberlas, que acrediten tal infracción.

The members of FEPRE have the duty to i) in good faith report any infractions or potential breaches of which they become aware, and ii) cooperate in any investigations conducted.

## 6

## PROCESSING, DEADLINES, AND REGISTRATION

- The Compliance **Channel Manager** is Joan Ramón Solé Sallent, who will be responsible for managing the channel and promptly handling reports.
- Upon receiving the communication, the informant will **receive an acknowledgment** of receipt within 7 calendar days of its reception.
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- The investigations will be conducted in accordance with the procedures outlined in FEPRE's Compliance Channel Management **Procedure**.
- If the communication is accepted for processing, an **Investigation Committee** will be formed, which may, during the course of the investigation, seek support from external third parties, always ensuring confidentiality.
- FEPRE will ensure that individuals who are part of the Investigation Committee do not **encounter a conflict of interest**
- The investigation will conclude within a **maximum period of 3 months** from the receipt of the report, extendable for an additional 3 months in cases where necessary.
- During the investigation, the informant may be asked to provide **further information**.
- The investigation will conclude with a **report** containing the results of the investigation
- FEPRE communications received, which will be included in the **Record Book**.





## 7

## GUARANTEES AND RIGHTS

FEPRE will ensure:

- ◆ The **protection of data and the confidentiality** of communications received through the Compliance Channel, including the data of both the informant and the reported party.
- ◆ The **prohibition of retaliation** against the informant.
- ◆ The protection of the informant by adopting, if necessary, **support measures**.
- ◆ The **right to honor** of both the informant and the reported party.
- ◆ El The **right to presumption of innocence** and the **right to defense** of the reported party.
- ◆ La **preservación de la identidad** del informante y de las personas afectadas.
- ◆ **Protection measures** in case, despite the prohibition, retaliation occurs.
- ◆ **Secrecy** regarding any aspect related to the information.
- ◆ El The right to be informed of the **status of the investigation** and its conclusions, both by the informant and the reported party.



**The filing of bad faith** reports may be subject to disciplinary action, in accordance with the applicable labor regulations.