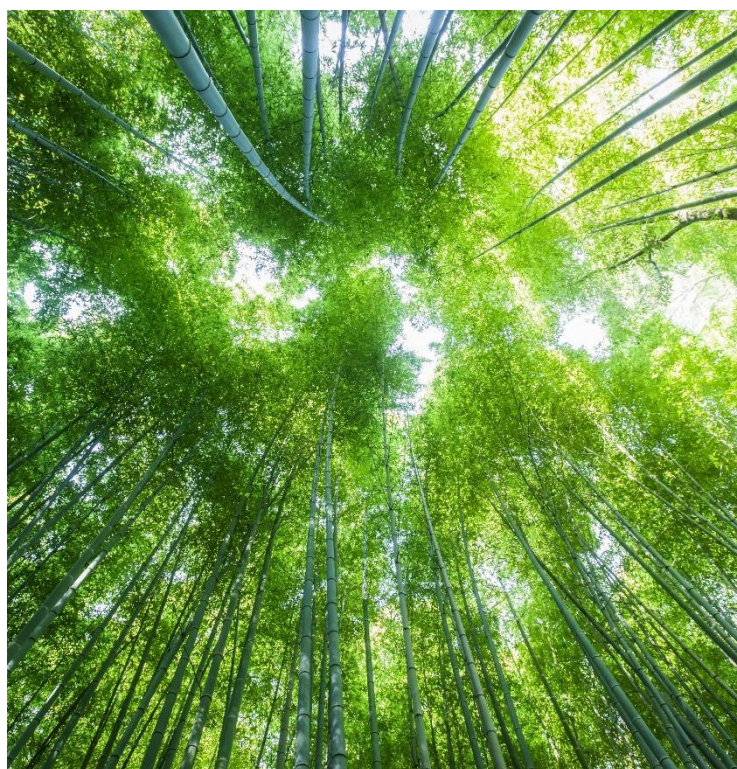


# **Internal Whistleblowing Policy**



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# Foreword and scope of application

## *Iberchem is committed to:*

- **Recognising that workers are valuable ears and eyes:** every item of information raised by the staff of Iberchem will be thoroughly analysed.
- **Implementing the proper culture:** Iberchem employees can rely on the open and supportive assistance of their managers or the Compliance function in case they suspect wrongdoing.
- **Responding promptly:** the group is dedicated to providing advice and solutions to any employee that raises an issue in a timely manner.



Iberchem encourages transparent, open and honest dialogue culture among its employees. The following guidelines as well as Iberchem's integrity commitments are described in the Code of Conduct that defines the behaviours expected from the employees of the Group.

This policy applies to all employees working for Iberchem and its subsidiaries, branches and representative offices (hereinafter collectively referred to as "Iberchem").

All individuals working at any levels of Iberchem, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, temporary and agency staff (collectively referred to as "Staff" in this policy) can report suspected wrongdoings.

Everyone at Iberchem is free to address their manager or any other employee regarding any potential breach of the Code of Conduct and integrity malpractices. The collaborators of Iberchem must feel free to discuss any topics with the management and/or with the Compliance function.

In addition, this policy allows you to request advice on a confidential basis or to make a report on a potential breach of the Compliance programme without jeopardizing your position in the group.

This policy applies to suspicion of breach of the Compliance programme or malpractice such as:

- Corruption
- Unfair commercial practices
- Conflict of interests
- Sexual and moral harassment
- Practices posing health and safety risks
- Any violation of internal/external regulation

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## How to report a case?

Any practice or behaviour that does not comply with Iberchem's values must be duly reported to the appropriate person.

The first person to contact is the Compliance Correspondent of your firm.

They are entrusted with the responsibility to notify of the matter to their own hierarchy, respecting the privacy and the informant's identity, to collectively reach the most suitable solution to the issue raised.

Should direct dialogue not be possible, Iberchem employees can send a written report. Employees can send their reports to the following address: [compliance@iberchem.es](mailto:compliance@iberchem.es).

The compliance department, in charge of receiving the alert raised by this bias, is responsible for dealing with it, then issuing a report to notify and discuss the matter with their own hierarchy.

If a person in charge of reviewing the report is mentioned in the suspected malpractice, they are then excluded from the handling process of the alert raised.

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## What should I state in my report?

Whenever an Iberchem employee raises an alert to their superiors, the message sent should contain precise and relevant information such as:

- **Context, historic and specific reason to raise an alert.**
- **Names, dates, places and any other useful information.**
- **Any documentation which might support the alert raised.**

The employee shall only provide accurate and impartial information regarding the disclosure being made.

The statement given will only be taken into consideration if there are sufficient grounds and precise details regarding the suspected wrongdoing.

Moreover, only statements provided in good faith are receivable within the framework of this procedure and any employee who uses such tool for slanderous or spiteful retaliation will be subjected to sanctions.

## To whom my report is addressed?

If sent in writing, the report is reviewed by the Compliance Manager, who is in charge of analysing the information contained in the report.

The Compliance Manager can share the information with the senior management, ensuring that only the necessary information and data is shared, to protect the informant's identity and external counsel when necessary.

The Compliance Manager is also in charge of notifying the informant of the receipt of their report and the validity of the exposed claim.

The analysis of the alert follows a two-step model comprising:

- 1) **An initial review** that evaluates the validity of the report, the validity of the exposed facts which allows deciding on whether to open a formal investigation or not. At this stage, the informant can be contacted by the person in charge of reviewing the report in order to gather more information on the case.
- 2) **An investigation:** after the completion of the initial review, and if the alert is receivable, the person in charge will provide legal qualification of the issues at stake and will decide on the further course of action.

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### *Depending on the case, the person in charge of the review of the report can:*

1. Decide on the inadmissibility of the report.
2. Decide to launch complementary investigations.
3. Decide to launch a procedure seeking to mitigate the problematic situation.

After this process, a formal statement regarding the final decision taken by the Compliance Manager is then sent to the author of the report.

## Will my report remain confidential?

The employee that raises the alert on a potential wrongdoing is requested to identify themselves to the person they report it to. Their identity will not be disclosed by Iberchem, unless prior authorisation is granted on the part of the reporting party, to any employee (s) targeted by the report.

Iberchem ensures that all aspects of the report (author, people concerned, described facts, etc.) remain strictly confidential, non disclosed to any person that is not involved in the review and/or resolution of the case, or communicated to any third party without the prior agreement of the informant.

Finally, the identity of the informant would not be disclosed unless requested by the authorities.

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## How is the individual mentioned in an alert approached?

Every employee of Iberchem mentioned in an alert raised by any other collaborator is presumed innocent until the veracity of the allegations is proven.

The person in charge of reviewing the alert informs such individual of the alleged facts and of the various steps of the alert treatment procedure. The employee mentioned in the alert raised cannot, in any case, have access to the informant's identity.

## Do I face a sanction in the event of an allegation is proven unfounded?

Staff may not be, in any way, dismissed, sanctioned, discriminated or subject to a detrimental treatment for having reported an issue, whenever this is performed in compliance with the internal whistleblowing policy and in good faith, even if they turn out to be mistaken.

Should an informant or any Iberchem employee feels to have suffered from such treatment, they may contact the Human Resources department. Staff must not threaten or retaliate against informants in any way. Anyone involved in such conduct will be subject to disciplinary action.

Notwithstanding the foregoing, the making of false allegations, in bad faith or with a view to personal gain under the whistleblowing procedure may be sanctioned according to the disciplinary procedure of Iberchem.

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## How will my personal data be affected?

Personal data that is processed in a whistleblower report shall be dealt in accordance with Iberchem values regarding data privacy and are kept during the period of the investigation.

After closing the investigation, personal data shall be deleted within a two-months period.

When legal proceedings or disciplinary measures are initiated, the personal data shall be kept until the conclusion of these proceedings.

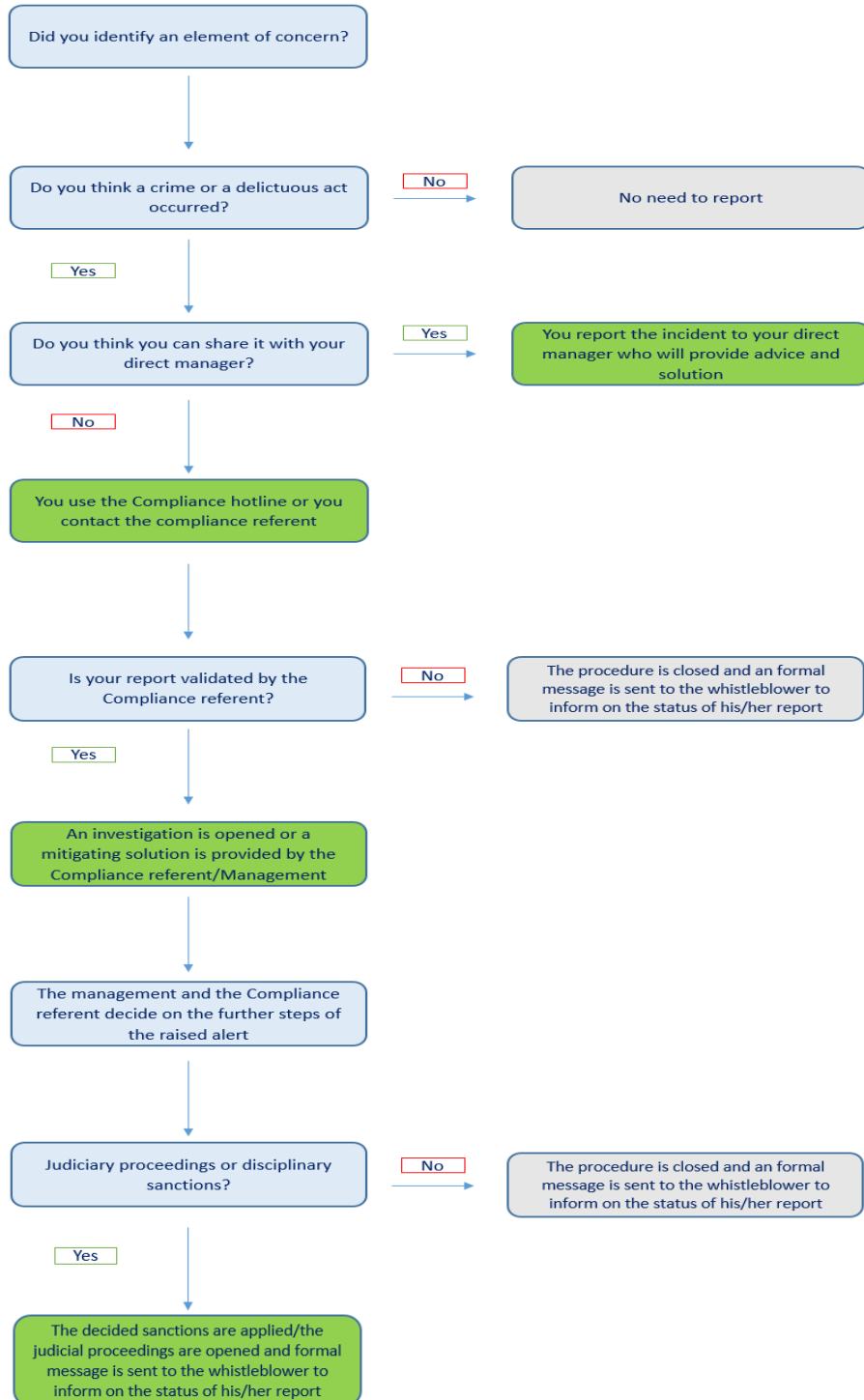


## Iberchem's values on Privacy

When dealing with the protection of the personal data of its employees, notably in the frame of the Ethical alert line, Iberchem is dedicated to the respect of the recommendation of the Spanish Data Protection Agency (AGPD) and to total compliance with the following regulations:

- *Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*
- *European Union's directive 95/56/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data.*
- *Organic Law 15/1999, passed on December 13<sup>th</sup>, on the Protection of Personal Data.*
- *Royal Decree 1720, 2007 , passed on December 21<sup>st</sup>, through which the Development Regulations are Organic Law 15/1999 are passed.*
- *Instruction 1/2006 passed on November 8<sup>th</sup>, by the Spanish Data Protection Agency on the handling of personal data for monitoring purposes through camera or video-camera systems.*

# Synthesis





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