

# Integrity Channel Policy



## Purpose

The objective of this Policy is to **outline the principles of action that govern the management and use of the Integrity Channel.**

**It is the duty and responsibility of employees to promptly report any actual or suspected non-compliance with the law, Moeve's Code of Ethics and Conduct or our internal regulations as stated in this policy through the Integrity Channel or external channel managed and operated by the Independent Authority for the Protection of Informants, as established by law.** Likewise, employees have an obligation to cooperate in good faith and in a proactive manner with any investigations that may be carried out.

We hope that this responsibility will be shared by the rest of the stakeholders with the aim of identifying irregularities that can damage or undermine Moeve's sustainability, reputation and long-term success.

In order to guarantee confidentiality, when a person from the Company receives a Communication that must be processed through the channels enabled within the Integrity Channel, the recipient of the Communication must immediately send it to the Integrity Channel Manager, as well as delete from their files (if applicable) the Communication received. Compliance with the above is very important, not only to maintain the confidentiality of the communications and ensure the proper functioning of the Integrity Channel, but also because failure to comply with this obligation may constitute a very serious infringement. Training in this matter will be given to all Company personnel on a regular basis.

## Our Commitments

- **The Board of Directors undertakes to set up an Internal Reporting System** ("the Integrity Channel") composed of the Reporting System Manager and the enabled whistleblowing channels. Said Integrity Channel includes the policy that outlines the general principles that govern the Integrity Channel and the detailed procedures that regulate its operation. Likewise, the internal system will have an Integrity Channel Manager who will be in charge of its management. The Integrity Channel will be transparent and accessible, guaranteeing confidentiality and upholding best practices with regard to monitoring, investigation, and protection of the Informant.
- The person designated by the Board of Directors as **Integrity Channel Manager and whose main responsibility will be to ensure its proper functioning is the Chief Compliance Officer of the Moeve Group.** The Integrity Channel Manager will carry out these responsibilities with full guarantees of autonomy and independence, without receiving instructions of any kind in the exercise of his/her duties and having all the necessary resources to discharge them, without fear of reprisals from any Moeve Group company, the Board of Directors or any of its executives.
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The current version of this Policy has been approved by the Moeve Board of Directors on May 19, 2023 and is effective from the moment of its approval.

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## Our Commitments (cont.)

As Integrity Channel Manager, he/she has the necessary decision-making and supervisory powers to oversee and monitor the operation, effectiveness and compliance with the applicable policies, ensuring that the Integrity Channel is suited to the needs and circumstances of each of the Moeve Group companies over which Moeve has effective management control, and that the disciplinary systems applicable in each case appropriately address and penalize non-compliances through the envisaged measures.

- **Employees have the obligation to report any non-compliance they are aware of, and failure to do so could be a very serious breach in itself, which may result in Disciplinary Action.** For such purposes, employees are encouraged to preferentially use Moeve's Internal Reporting System including the established internal complaint channels. The use of the internal reporting channels will allow Moeve to be able to respond to Communications received in a timely manner and thus resolve possible non-compliances more effectively.
- **Communications can be made in writing or verbally, through the channels set up within the Integrity Channel, which are available 24 hours a day, 7 days a week through the [moeve.ethicspoint.com](http://moeve.ethicspoint.com) website.** At the request of the Informant, the Communication may also be made through a face-to-face meeting within 7 days from the request. All enabled channels within the Integrity Channel may be used to request said interview.

Notwithstanding the foregoing, complaints may be filed through the external channel managed and operated by the Independent Authority for the Protection of Informants (or before the corresponding authorities or regional bodies) as stated in

Law 2/2023 of February 20th, which regulates the protection of persons who report violations of regulations and the fight against corruption.

**Moeve guarantees the rights of the Informant in good faith and the proper management of the Communications received, as determined by the applicable regulations.** To this end:

- The Integrity Channel Manager will analyze all the communications received through the Channel. Depending on the result of said preliminary analysis, an Investigation may be initiated with the objective of clarifying the events that occurred and determining the existence or not of a non-compliance.
- The Investigation will be conducted in accordance with the provisions of the Internal Investigations Procedure. For such purposes, the Integrity Channel Manager may rely on specialized units in each matter and in accordance with Moeve's internal procedure.
- Informants will be sent an acknowledgment of receipt of their Communication within 7 calendar days following its receipt, unless receipt unless this may jeopardize the confidentiality of the Communication.
- The Integrity Channel Manager will ensure the confidentiality of the communications, so that the Informant's data, as well as the data of the people who participate in the investigation and any affected parties, are not disclosed except on a need-to-know basis or as required by law.

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## Our Commitments (cont.)

- The investigation must be concluded within a period not exceeding 3 months after the acknowledgment of receipt of the Communication is sent to the Good Faith Informant or, if an acknowledgment of receipt was not sent to the Good Faith Informant, within 3 months from the expiration of the period of 7 days after the Communication is made, except in cases of special complexity that require a longer period, in which case, this may be extended up to a maximum of three additional months.
- During the Investigation, follow-up contact with the informant may be needed to request, where applicable, further information.
- In handling information related to any communication or investigation, Moeve complies with all applicable personal data protection and privacy laws.
- **Moeve undertakes to guarantee the rights of Affected Parties under investigation:**
  - Enabling them to be informed of the actions or omissions attributed to them. Said communication will take place at the time and in the manner deemed appropriate to guarantee the success of the Investigation.
  - Assuring their right to be heard at any time.
- Respecting their right to a defence, to the presumption of innocence and their right to honor.
- **Moeve is committed to protecting the Informant in Good Faith and any person who participates or cooperates in good faith in the Investigation process from any possible retaliation** or threat of retaliation. Any Communication or submission of information made in “bad faith” (i.e., deliberately false or misleading or made with malicious intent) will be subject to disciplinary action.
- **The Integrity Channel Manager will ensure that all actions considered appropriate have been carried out to determine the existence of the reported non-compliance allegation**, as well as to obtain the necessary evidence to corroborate the commission of said breach, according to the principle of necessity, suitability, and proportionality.
- **The Integrity Channel Manager will take all the necessary measures and precautions to avoid conflicts of interest** as detailed in the Integrity Channel Procedure.
- **An updated record will be kept, in accordance with current legislation.**
- Once the investigation has been completed and based on its results, **the Company will act in accordance with current legislation.**

## Scope of Application

**This Policy applies to Moeve, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.**

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy.

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