

ESSENTIAL PRINCIPLES OF THE COMPLAINTS HANDLING PROCEDURE

DOMINION's whistleblowing procedure establishes a framework for reporting regulatory and ethical breaches within the organisation and aims to promote a corporate culture of compliance and work and professional ethics, as well as absolute respect for the law in force (both supranational, national and those of the countries in which it operates).

Scope of application

An internal reporting system integrating the Ethics Channel and the Harassment Channel is established, through which employees and other interested parties can report any information related to possible legal violations, breaches of the Code of Conduct or unethical actions in the work and professional environment.

Head of the Internal Information System

The Head of the Internal Reporting System is the Director of Risk, Compliance and Sustainability, who oversees the functioning of the system and ensures its integration into the organisation. The Independent Whistleblower Protection Authority is notified of the appointment of this person.

Information channels

The procedure establishes two information channels: the Ethics Channel and the Harassment Channel. Each channel has a designated person in charge of receiving and processing complaints submitted through that specific channel.

Communications to the Internal Reporting System can be made in writing or verbally.

Written communications can be channelled as follows:

- Complaint form on the corporate website
- By post to one of the following addresses:
 - **For cases of sexual and/or moral harassment:** To the People & Culture Department at the following address: Avenida del Partenón, 16, 2^a, 28042 Madrid. Spain.
 - **For cases of non-compliance with the Code of Conduct and other acts contrary to the law:** To the Risk, Compliance and Sustainability Department at the following address: Plaza Pío Baroja 3, 48001 Bilbao (Bizkaia). Spain.

The channels integrated within the Whistleblowing Management System will allow for the receipt of anonymous complaints, which will be processed in the ordinary way, with the limitations inherent to anonymity.

Management and processing

All complaints received are recorded in a log book, guaranteeing the confidentiality and security of the information. The Head of Management analyses and verifies the reports, and may hire external professionals to investigate the reported facts. During the investigation process, the confidentiality of both the informant and the reported person is guaranteed, and the presumption of innocence and the honour of the reported person are respected.

Upon receipt of the complaint, an acknowledgement of receipt will be sent within a maximum of seven calendar days, although this period will be reduced in cases that affect a country with a more restrictive legislation.

During the processing of the complaint, it is possible to maintain communication with the informant and, if deemed necessary, to request additional information.

The maximum period for the investigation and issuing of a final report is three months, although this may be extended for a maximum of a further three months in cases of particular complexity. Also in this case, the deadlines will be reduced in cases that affect a country with a more restrictive legislation.

Once the investigation has been completed, a report is issued that includes the facts denounced, the assessment, the results of the investigation and the measures adopted.

When the reported facts could constitute a crime, the information is immediately forwarded to the Public Prosecutor's Office.

Safeguards and protection of personal data

Measures are put in place to monitor and prevent retaliation against the whistleblower. In addition, the procedure is monitored annually and its effectiveness is evaluated, with the aim of improving the protection of whistleblowers and responding effectively to complaints.

Guarantee of the right of the reported person to be informed of the actions or omissions attributed to him/her, and to be heard at any time.

In terms of data protection, DOMINION guarantees the confidentiality and protection of the whistleblower's identity, even if the communication is sent through other reporting channels than those established.

Personal data is only disclosed when it is necessary to carry out the investigation or to comply with legal requirements, in compliance with personal data protection legislation.

Any questions regarding data protection may be sent to the DOMINION data protection officer's mailbox at the following address: dpo.corporate@dominion-global.com. The data protection



officer of DOMINION shall be responsible for ensuring compliance with data protection regulations in the context of information management..

Version 2 - 2024