



Ethics and Compliance Channel  
Management System and  
Whistleblower Protection Policy



## Purpose

The purpose of this Policy is to establish the principles and guarantees governing the Ethical and Compliance Channel Management System<sup>1</sup> (hereinafter, "Channel Management System" or "System"), which includes the Ethical and Compliance Channel, as a formal means for reporting queries or complaints regarding non-compliance and irregularities.

This Policy reflects Redeia's express commitment to fostering a culture of integrity and encouraging the reporting of violations of current legislation, the Code of Ethics and Conduct (hereinafter, "Ethics Code"), and other related internal regulations of Redeia through the Channel Management System, which provides adequate protection for individuals who report such violations.

Supporting and complying with the principles contained in this Policy contribute to meeting the corporate goal, as well as to achieving the strategic objectives thereof, consistent with the values, principles and conduct guidelines set forth in the Redeia Code of Ethics and Conduct.

## Scope

### Subjective Scope

This Policy is applicable to all majority-owned Redeia companies. It is the responsibility of all the members of Redeia to comply with this Policy in the exercise of their roles and responsibilities, and in all professional fields in which they represent the organisation. In those investee companies in which Redeia does not have effective control, principles consistent with those set forth in this Policy will be implemented.

All persons who are part of Redeia are required to report any non-compliance within the scope of this Policy through the Channel Management System. Furthermore, external stakeholders of Redeia (hereinafter, "Third Parties"), are encouraged to use the Channel Management System as a means of communication for cases covered by this Policy, even if other channels are available to them.

This Policy sets forth the minimum regulations applicable to all majority owned Redeia companies. In the event of any contradiction between local legislation and this Policy, the provisions of the applicable local legislation shall take precedence.

### Target Scope

Both members of Redeia and Third Parties are required to report any irregular conduct, or reasonable suspicions thereof, that may constitute a violation of current legislation, the Code of Ethics, and other related internal regulations of Redeia. Redeia's Ethics and Compliance Channel (hereinafter, the "Ethics Channel") may also be utilised to address doubts or inquiries regarding these matters.

The following issues may be reported through the Ethics Channel:

1. Violations of the values and principles outlined in the Code of Ethics and its related internal regulations;
2. Incidents or behaviours that may have criminal implications;
3. Serious or very serious administrative breaches;
4. Violations of labour Laws pertaining to occupational health and safety.

<sup>1</sup> It refers to the company's Internal Reporting System in accordance with Law 2/2023, of 20 February, which regulates the protection of individuals who report violations of regulations and the fight against corruption.

Violations of European Union law included within the material scope of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 on the protection of persons who report breaches of Union law, as well as the Spanish transposition law;

Furthermore, the Ethics Channel may be used to communicate:

5. Inquiries regarding the interpretation of ethical values, principles, and guidelines outlined in the Code of Ethics.
6. Suggestions for improvement related to the Code of Ethics.
7. Inquiries directed to bodies responsible for supervising legal obligations and commitments assumed by the organisation.

The Channel Management System should not be used to communicate interpersonal matters that do not constitute a violation, that are part of individuals' personal and private sphere, or that are mere rumours.

Communications falling within the scope of this Policy will benefit from the protection measures and guarantees provided by the System.

## Principles and Guarantees of Redeia's Channel Management System

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- **Confidentiality and anonymity:** Ensuring anonymity and, in all cases, maximum confidentiality regarding the identity of the reporter, the information provided, and the actions carried out in the management and processing of the report. The Channel Management System allows for the submission of anonymous communications.
- **Secrecy:** Encouraging individuals involved in the processing and investigation of reports to exercise utmost discretion regarding the information that comes to their knowledge due to their position or function.
- **Good faith:** Ensuring that the information provided in the reports is honest, complete, and truthful, even if unintentional inaccuracies or omissions occur.
- **Independence and impartiality:** Ensuring a fair hearing and fair treatment for all parties involved. Those involved in the process should act in good faith to uncover the truth and clarify the facts.
- **Respect, protection, and prohibition of reprisals:** Taking appropriate measures to safeguard the right to protection against reprisals for individuals who report in good faith, as well as ensuring the dignity and privacy of those involved.
- **Diligence and promptness:** Ensuring that the investigation and resolution of reported incidents are handled with professionalism, diligence, and without unnecessary delays to complete the procedure in the shortest possible time while respecting procedural guarantees.
- **Respect for fundamental rights:** Guaranteeing the right to information, the right to a defence, the right to refute allegations, the presumption of innocence, and the right to honour for all individuals involved in the handling of communications through the Channel. Additionally, these individuals have the right to be heard at any time in a manner that ensures a successful investigation.
- **Privacy:** Ensuring the protection of personal data and respecting the right to privacy of individuals involved.
- **Regulatory compliance:** Ensuring that communications are processed in a comprehensive and professional manner, in accordance with current legislation, applicable internal regulations, and particularly data protection regulations.
- **Transparency and accessibility:** Ensuring that information about the Channel Management System and its regulations is conveyed clearly and meaningfully, and that the system is publicized and easily accessible.

## Means for Reporting Queries or Complaints within Redeia

Redeia has multiple communication channels available to individuals within Redeia and Third Parties, aimed at fostering a culture of integrity and communication as a fundamental aspect of the Ethical and Compliance Channel Management System.

The following are the available channels for reporting complaints and queries within Redeia<sup>2</sup>:

- **Redeia's Ethics and Compliance Channel Platform:** The online application (<https://www.redeia.com/en/corporate-governance/ethics-and-compliance/whistle-blowing-and-compliance-channel>) is available at the group level and is provided by a leading company in this field. It can be accessed through the Redeia website and intranet, in a separate and easily accessible section. This application has security measures in place to protect the integrity of information and the processing of personal data.
- **E-mail:** Reports can be submitted via the e-mail address [gestoretico@redeia.com](mailto:gestoretico@redeia.com).
- **Postal mail:** Redeia, Paseo Conde de los Gaitanes 177, 28109 Alcobendas (Madrid), Attn.: Ethics Manager and Stakeholder Ombudsman.
- **Face-to-face meeting:** Any concerns may also be reported verbally to the Ethics Manager through a face-to-face or remote meeting within seven (7) days of receiving a request through the Channel platform or through a written communication addressed to the Ethics Manager.

Additionally, the Redeia website provides clear and accessible information about external channels for reporting to the relevant authorities.

Redeia's other communication channels are not intended for reporting irregularities. If any communication received through those channels falls within the scope of the Ethics Channel Management System, the informant will be redirected to the Ethics Channel for appropriate handling.

## Head of the Ethics and Compliance Channel Management System: Ethics Manager and Stakeholder Ombudsman

Redeia's Board of Directors appoints the Ethics Manager and Stakeholder Ombudsman (hereinafter, "Ethics Manager") as Head of the Ethics and Compliance Channel Management System to handle the management of the channel and process investigation files, notwithstanding the support they may receive from the compliance departments of other Redeia companies. The Ethics Manager operates independently and autonomously from other bodies within Redeia and has the necessary human and material resources to fulfil their responsibilities.

The appointment and dismissal of the Ethics Manager will be reported to the Independent Authority for the Protection of Whistleblowers (A.A.I.) or the relevant autonomous community authorities or bodies within their respective jurisdictions.

The first edition of this **Ethics and Compliance Channel Management System and Whistleblower Protection Policy** has been approved by the Board of Directors of the Parent Company on **30<sup>th</sup> May 2023**, its effective date. This Policy may be amended with the express approval of the Board of Directors.

The Policy is published on Redeia's website, corporate intranet, and the websites of its subsidiaries.

<sup>2</sup> Communications related to moral, sexual, and gender-based harassment can be submitted through the Ethics and Compliance Channel or via email to the Medical Service ([serviciomedico@redeia.com](mailto:serviciomedico@redeia.com)). All reports will be processed according to the procedure outlined in the "Action Guide for the Prevention of Moral, Sexual, and Gender-based Harassment".

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