Ethics and Compliance Channel Policy

Approved by:
Board of Directors of Hispasat, dated 26 March 2026

Purpose

This Ethics and Compliance Channel Policy (hereinafter, the **Channel Policy**) aims to establish the essential principles, guarantees, scope, and operation of the Hispasat Group Ethics and Compliance Channel, as an integral part of its Internal Information System, with the purpose of providing a confidential, secure, and effective means for communicating queries, reports, or information relating to potential irregularities, regulatory breaches, or violations of the Code of Ethics and Conduct and of applicable internal and external regulations, ensuring the protection of the reporting person, the confidentiality of the information, and compliance with applicable legislation.

Scope

The Hispasat Group[1] Ethics and Compliance Channel (hereinafter, the **Channel**), which forms part of the Internal Information System (hereinafter and interchangeably, the **System** or **IIS**[2]) of Hispasat (hereinafter, the **Group** or **Hispasat**), available at **canaletico.hispasat.com** as well as on its internal and external websites, is the preferred confidential communication channel made available by Hispasat to all directors, officers, employees, representatives, suppliers, and other third parties providing services to the Group who, in any capacity, act on behalf of Hispasat—such as agents, intermediaries, or subcontracted companies (hereinafter, **Professionals and Collaborators**)—regardless of the territory in which they carry out their activities, as well as to other third parties with a legitimate interest, to report:

- any questions regarding the interpretation or application of the Hispasat Group Code of Ethics and Conduct and its implementation;
- any unlawful behavior, irregularity, or infringement detected in relation to the Code of Ethics and its implementation;
- facts or conduct that may have criminal relevance;
- serious or very serious administrative infringements;
- breaches of labor law relating to occupational health and safety3.
- within the scope of the European Union:
  - breaches of European Union law, particularly those relating to public procurement, services, financial products and markets, the prevention of money laundering and terrorist financing, product safety, transport safety, environmental protection, radiation protection and nuclear safety, public health, consumer protection, protection of privacy and personal data, and the security of network and information systems;
  - infringements affecting the financial interests of the European Union or
  - infringements affecting the internal market of the Union (such as competition law, State aid, or corporate tax matters),
  - any criminal offence or serious or very serious administrative infringement, including those involving financial loss to the Public Treasury or to Social Security (or equivalent bodies); and
  - any other infringements or irregularities that may be reportable through the companies' internal channels in accordance with the legislation in force in each country.

[1] For the purposes of this Policy, the Hispasat Group shall mean both Hispasat, S.A., as the parent company of the Group, and any of its subsidiary companies in which it holds a direct or indirect shareholding, in accordance with the Group's corporate structure in force at any given time.

[2] It refers to the Internal Information System in accordance with Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.

[3] Communications relating to moral, sexual, or gender-based harassment may be submitted through the Ethics and Compliance Channel and shall be processed in accordance with the procedure established in the *"Hispasat Group Protocol for the Prevention of and Response to Harassment Situations."*

It is the duty of all Hispasat Professionals and Collaborators to report any alleged irregularity or act contrary to the law or to internal regulations of which they have certain knowledge or reasonable suspicion.

In this way, potential irregularities or breaches may be identified and, where appropriate, verified, and suitable measures may be adopted to mitigate the risk of their occurrence in the future.

Mechanisms for Submitting Queries or Reports

The Hispasat Group makes the following channels available to Professionals and Collaborators for reporting potential irregularities:

i) Ethics and Compliance Channel Platform:
   - ✓ Accessible through the Hispasat website and intranet (in a separate and easily accessible section).
   - ✓ Possibility of submitting anonymous communications.
   - ✓ Measures in order to preserve the security and integrity of the information and the proper processing of personal data.

ii) Postal mail: Hispasat, Avenida de Bruselas, 35, 28108, Alcobendas (Madrid), for the attention of the Head of the Internal Information System.

iii) In-person meeting: At the request of the reporting person, the query or report may also be submitted through an in-person meeting, within a maximum period of seven (7) days, or as soon as possible after the request has been made through the Ethics Channel.

The availability of the **Ethics Channel as the preferred confidential reporting** channel shall be without prejudice to the existence of **other external reporting channels** that may be enabled for this purpose by public authorities in accordance with the legislation in force in each country and, where applicable, by the institutions, bodies, or agencies of the European Union.

Principles and Guarantees of the Internal Information System

In all cases, the actions carried out by the Corporate Compliance function are conducted under the principles of **impartiality, confidentiality, and independence**, responding within the time limits established in accordance with applicable legislation :

- **Principle of impartiality**: Hispasat shall ensure that, due to mere interests or intent, none of the people involved in the report (reporting person, reported person, or other relevant interested party) is unduly benefited or harmed.
- **Principle of confidentiality and anonymity**: The confidentiality of the communications received, and the investigation conducted shall be maintained. The confidentiality of the identity of the reporting person, the information reported, and all actions carried out in the management and processing thereof are guaranteed.
- **Principle of trust / independence**: Hispasat shall manage any reported irregularity in an appropriate, serious, and objective manner.

The Hispasat Internal Information System is based on a set of **guarantees** aimed at ensuring proper and responsible management of the communications received through the Ethics Channel, protecting persons who report in good faith, safeguarding the rights of affected people, and ensuring confidentiality and compliance with the applicable regulatory framework:

- **Discretion**: encouraging all people involved in the management, processing, and investigation of communications to act with the utmost reserve and discretion with respect to the facts and information known to them as a result of their position or function.

To preserve the identity of the reporting person and prevent any potential retaliation, the investigated subjects (also referred to as "persons affected by the communication") shall not have access to the communication or to data that would allow the reporting person to be identified.

Notwithstanding the foregoing, the identity of the reporting person may be disclosed to the Judicial Authority, the Public Prosecutor's Office, or the competent Administrative Authority within the framework of criminal, disciplinary, or sanctioning proceedings. In such cases, the reporting person shall be informed in advance, unless such information could jeopardize the investigation or the administrative or judicial proceedings.

- **Good faith**: ensuring that communications submitted through the Channel are made honestly, truthfully, and with sufficient grounds, without prejudice to any possible inaccuracies or omissions that the reporting person may have made involuntarily. Communications, knowingly based on falsehoods, as well as those referring to information obtained unlawfully, are strictly prohibited.
- **Protection of persons and absence of retaliation**: adopting the necessary measures to guarantee effective protection against any form of retaliation for persons who report facts in good faith, as well as preserving the dignity, privacy, and rights of all persons affected by the processing of communication. It is strictly prohibited to take retaliatory measures against those who, in good faith, (i) report to Hispasat any of the infringements or offences mentioned above, or (ii) cooperate in their investigation or assist in their resolution.
- **Protection of privacy and personal data**: ensuring appropriate and confidential processing of personal data, always guaranteeing respect for the privacy of affected persons and compliance with applicable data protection regulations. Personal data shall be processed only for as long as necessary to fulfil such purposes.
- **Respect for fundamental rights**: guaranteeing full respect for the fundamental rights of all persons involved in the processing of communications, including, among others, the rights to information, defense, adversarial proceedings, presumption of innocence, and honor.
- **Diligence in management**: ensuring that the analysis, investigation, and resolution of the reported facts are carried out with professionalism, rigor, and diligence, avoiding undue delays and seeking to complete the procedure within the shortest possible time, with full respect for the applicable guarantees.
- **Transparency**: guaranteeing that information relating to the System, its operation, and its regulation is clear, understandable, and easily accessible, promoting its appropriate dissemination and awareness among the groups to which it applies.
- **Liability and disciplinary regime**: Failure to comply with the provisions of this Policy may give rise to the application of the corresponding disciplinary measures, without prejudice to any legal liabilities that may arise in accordance with the legal system of the country in which the infringement was committed.

System Owner and Management of the Ethics and Compliance Channel

The **Corporate Compliance function** of the Hispasat Group manages all communications received through the Ethics and Compliance Channel.

In particular, the **Head of the System** (hereinafter, the **HS**) is also responsible for the management of the Channel. Access to the content of the Channel is **restricted** to the Head of the System and to the members of the Corporate Compliance function designated by him or her.

Both the appointment and removal of the Head of the System shall be notified to the Independent Authority for the Protection of Whistleblowers (A.A.I.) or, where applicable, to the competent authorities or bodies of the autonomous communities within the scope of their respective powers.

The Head of the System acts autonomously and independently from other Hispasat bodies and is provided with the personal and material resources necessary to carry out his or her functions.

The Head of the System shall carry out any actions deemed relevant and, in all cases, in accordance with applicable internal implementing regulations, for the proper clarification of the reported facts or conduct. These actions may include taking statements from other Hispasat Professionals or Collaborators involved in or affected by the investigation, including the person submitting the report or query (hereinafter, the **Reporting Person**), as well as ensuring confidentiality and the absence of conflicts of interest in the resolution of communications.

Hispasat professionals, as well as any other third parties with a legitimate interest, must cooperate loyally, actively, and effectively with the Corporate Compliance function during the course of its investigations.

The **procedure for action** to be followed by the Corporate Compliance function in the processing, investigation, and resolution of reports is detailed in the ***Ethics and Compliance Channel Management Protocol***, which forms part of the internal regulations of the Hispasat Group and shall be disseminated to all Professionals and Collaborators.

Fraudulent or Bad-Faith Reports

The protection and support provided by Hispasat are subject to the Reporting Person having submitted the report acting in **good faith**.

The Reporting Person must have reasonable grounds to believe, considering the circumstances and the information available to them, that the reported facts are true. In this sense, good faith implies reporting based on at least reasonable grounds to believe that the information regarding alleged infringements was true at the time of reporting.

Those who deliberately and knowingly report incorrect or misleading information shall not benefit from support or protection by Hispasat, and appropriate measures may be taken against those who act in bad faith, such as submitting false, distorted, or unlawfully obtained information.

Dissemination and Training

The content of this Policy is **communicated and disseminated** to all Professionals and Collaborators, who shall be duly informed of its existence and its mandatory nature.

Hispasat develops a criminal risk prevention training plan, which includes the content of this Policy and the operation of the Ethics Channel. This training is managed by the Corporate Compliance function and is mandatory for all Professionals and Collaborators.

This Policy is published on Hispasat's external website and corporate intranet, as well as on those of its subsidiary companies, and is available in the main languages of the countries in which Hispasat operates, to facilitate consultation by key stakeholders.

Approval and Amendment

This Ethics and Compliance Channel Policy was approved, in its **version 1**, by the **Board of Directors of Hispasat** on 26 March 2026, the date of its entry into force. This Policy may be amended with the express approval of the Board of Directors.

Trusted and Reliable
Satellite Solutions

Avda. de Bruselas, 35
28108 Alcobendas
Madrid, Spain
T +34 91 480 50 00

hispasat.com

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