

## ETHICAL CHANNEL PROCEDURE AMPER GROUP

As part of the implementation of the Regulatory Compliance system, the Amper Group has established an Ethical Channel through which all its employees, suppliers, customers, shareholders and any person working under the supervision and management of contractors, subcontractors and suppliers, may report any situation or indication that implies the commission of a crime, a breach of current legislation, a violation of the principles of the Code of Ethics, the Equality Plan and a serious breach of internal regulations.

Please read this document, the Code of Ethics and the regulations that you believe may be being breached carefully before making your report.

In order for you to be able to make any communication with all the guarantees of confidentiality and security, the following e-mail address has been created for this purpose:

- [canaldenuncias@grupoamper.com](mailto:canaldenuncias@grupoamper.com)

You will also be able to report to:

- Member of the Ethics Committee, via their professional email address.
- Hierarchical superior.

### **The Communication shall contain at least the following information:**

- Brief statement of the facts, arguments and/or evidence in support of the facts.
- The individual or group considered to be possibly responsible for the conduct.
- Your name and surname(s) and identity number, although anonymous complaints will be accepted..
- E-mail address in order to respond to your communication and inform you of the results of the investigation. If you wish to remain anonymous, you may create an anonymous e-mail address for this purpose.

### **Complaints channel procedure:**

The Compliance Department will analyse all received communications:

- After being informed, a file will be opened. This department will verify that there is no incompatibility and will proceed to open the file, deciding in a reasoned manner whether it is necessary to carry out an investigation or whether it should be filed due to its irrelevance or lack of credibility, after which it will communicate this decision to the rest of the members of the Ethics Committee.
- In any case, an acknowledgement of receipt of the complaint shall be sent to the complainant within 7 days of receipt.
- The Ethics Committee shall appoint an instructor, who may be internal or external, single-person or multi-person, depending on the needs of the case. In addition, the Committee may take precautionary measures to protect the complainant, to prevent any further activity, and to prevent the complainant from being subjected to any further activity.

- After carrying out the investigation, the instructor will draw up a report with conclusions, in which the recommended sanctions and corrective measures, if considered appropriate, will be included.
- The report shall be submitted to the decision-making body, which may vary depending on the seriousness of the facts and the persons involved: The Ethics Committee, the Audit Committee or the Board of Directors. Once it has met and studied the case, it will take the sanctions and measures it deems appropriate.
- In any event, a response shall be given within a maximum period of three months.

## Whistleblower Protection

The Amper Group will put in place all necessary measures to protect the informant from any kind of retaliation such as suspension, dismissal, demotion or denial of promotion; denial of training, evaluation or negative references with respect to their work performance, etc.

The Amper Group will take supportive measures such as free information and advice.

Measures to protect against retaliation, e.g. attribution of liability with regard to the acquisition of or access to the reported/disclosed information.

## Personal Data

The data provided through the Ethical channel will be treated in such a way as to guarantee the confidentiality of the information received and only those persons who have been designated to carry out these functions will have access to them. However, access by other persons, or even communication to third parties, shall be lawful when necessary for the adoption of disciplinary measures or for the processing of any legal proceedings that may be required.

The necessary measures shall be taken to preserve the identity and guarantee the confidentiality of the data corresponding to the persons affected by the information supplied.

The data shall be kept in the information system for a maximum of 3 months, after which time they may only be kept for the purposes of providing evidence of the operation of the crime prevention model and for the purpose of bringing or defending legal action.

Information from files that have been archived without investigation may only be retained in anonymised form.

If you would like to know more about the processing of your data and about your rights under the European Data Protection Regulation, please consult our Privacy Policy on our website <https://www.grupoamper.com/>