CODE OF ETHICS

January, 2026

1. INTRODUCTION

The Code of Ethics (hereinafter, "the Code") is the highest ranking internal regulation that establishes the Principles, Values and Conduct that must govern the individual professional practice of all members of the company, as well as their collective integration into the corporate culture of INCRO, S.A., (hereinafter "INCRO").

Both the specific provisions contained in this Code and the principles and values that underpin it are a basic pillar in the operation of INCRO, and their strict compliance is considered an essential element of coexistence within the company.

Since the incorporation of the company, we have always maintained a proactive attitude and constant improvement in the face of the different changes that affect the business sector in which we operate.

Following the reform of the Criminal Code by virtue of Organic Law 1/2015, of 30 March, the Board of Directors agreed to the approval and implementation of a Crime Prevention System or Programme that fully complied with the requirements and conditions established in Article 31 bis of the Criminal Code, tightening the requirements established for surveillance, control and prevention of crimes within legal entities, identifying the possible risks of committing crimes in the company, with the firm commitment to review the current associated controls and propose and execute an Action Plan, with the most absolute commitment of the General Manager and Directors of INCRO.

INCRO verifies compliance with these principles by creating a regulatory compliance area, one of its most important functions being to verify knowledge and compliance with the Code of Ethics.

2. PURPOSE AND OBJECT

This Code of Ethics constitutes an express declaration of the values, principles and conducts required of all INCRO members, in the development of their professional activity, respect for and compliance with Human and Labour Rights and the full integration of the entire group of people, with their complexity, particularity and diversity, into the corporate culture.

This Code establishes a deontological guide for all directors, directors, employees and any person who collaborates, provides services and is related to or linked to INCRO, in order to control and prevent any type of criminal or fraudulent act, regardless of its nature. In this way, INCRO. It aims to:

- Disseminate the values, principles and objectives of the company in accordance with respect for Human and Social Rights.
- The participation and integration of all workers and collaborators in the obligation to accept, respect and apply this Code.
- To facilitate the prevention, detection and elimination of irregular conduct, thus contributing to maintaining and protecting INCRO's values and good name, through the creation of a whistleblowing channel.

3. SUBJECTIVE SCOPE OF APPLICATION

The Code of Ethics is always applicable to all members of the administrative bodies and to all employees of INCRO. It is also applicable to the service providers of INCRO, S.A., as well as to any other person or entity with which the company maintains a relationship of any kind and who expressly agree to be bound by it (hereinafter, the "Obligated Persons").

Obligated Persons have the inexcusable duty to know, comply with and apply the Code of Ethics and, consequently, they must respect the values, principles and rules contained in the Code, both in their professional relations with INCRO, and the rest of the Obligated Persons, as well as in their relations with customers, competing companies, the Public Administration and society in general.

Consequently, INCRO assumes the duty to make this Code known to the persons or entities that contract or are related to it.

4. DEFINITION OF OBLIGATED PERSONS

This Code of Ethics will be applicable to all stakeholders with whom the company relates and with whom it acquires a commitment to integrity and good practices. The requirements inherent in the acceptance of this Code and what corporate social commitments they imply for the Company are detailed below.

Employees/Managers.

Regardless of their hierarchical level and the departmental area to which they belong, all employees are obliged to comply with the legislation and regulations in force in the place where they provide their services, also considering all the express prohibitions contained in this Code.

Company representatives.

The persons who act as representatives of INCRO, in companies or entities that do not belong to it, will observe the rules of this Code of Ethics and will promote the application of its principles in the companies and entities before which they represent INCRO.

Suppliers.

INCRO has established optimal selection criteria to ensure an objective and transparent evaluation of the suppliers with which it contracts. The main aspects to be taken into account to achieve optimal standards in the provision of the service and/or product are:

- Quality of the good acquired or the service received.
- Technical solvency of the supplier.
- More favorable economic conditions.
- Previous experiences or previous relationships.

The aforementioned criteria will be evaluated in a comparative manner, requesting as many offers as necessary to obtain the best possible contract. The final choice must be justified in such a way as to guarantee compliance with an objective and transparent evaluation.

In addition, this Code is mandatory for service provider companies, as a guarantee for society of an alignment of values and commitments that ensure a transparent, truthful and honest relationship. It is strictly forbidden for personal or individual aspects of any of the parties to prevail, such as:

- Receiving kickbacks, bribes, or prizes/gifts that could be construed as exceeding business practices or courtesy detail. It is mandatory to assess the aspects that conflict with the objective evaluation criteria.
- Receive personal, subjective or family benefits derived from the contract and that are unrelated to it.
- To enter into contracts by virtue of favors or personal relationships.

Customers.

It will be guaranteed that the information that INCRO holds about its customers will be duly protected by data protection legislation, compliance with which will apply to each customer

personally and using all the necessary means for its absolute respect and compliance.

Other stakeholders.

In addition, this Code of Ethics will be applied to all those persons who may be protected by its content, adapting the rules, policies and systems provided for in this Code to each case.

In the event that doubts arise regarding how to apply the Code, the Director of Regulatory Compliance should be consulted.

5. OBLIGATION TO COMPLY WITH THE LAW AND OBEY THE RULES

5.1. Compliance with all applicable regulations.

Persons subject to this Code have the unavoidable obligation to know, comply with, respect and apply the legislation in force in their field of action. Failure to comply with the legislation in force will be considered a violation of the Code.

The company will provide the Subject Persons with an explanation of the applicable regulations in each case and, in order to make the appropriate clarifications and resolve any doubts that may arise, INCRO makes all its means available to them.

5.2. Obligation to facilitate investigations.

Subject Persons have the duty to support, facilitate and cooperate with any investigation carried out by the Public Administrations, regulatory bodies, the Administration of Justice, the State Security Forces and Corps or the company itself, directly or through its Regulatory Compliance Area or any person or entity designated for this purpose.

6. VALUES AND BASIC PRINCIPLES OF BEHAVIOR

6.1. Respect.

6.1.1. Respect for people.

For INCRO, respect for the dignity of every person, by the mere fact of being one, is the fundamental value that governs our company and our actions. For us, it is especially important to respect the dignity of all the people who are part of the company, its customers, suppliers, shareholders and, in general, respect for the dignity of anyone who has had or may have any relationship with the company.

- INCRO prohibits harassment, abuse and discriminatory treatment on the basis of race, colour, nationality, religion, political opinion, affiliation, age, sex, sexual orientation, status – including pregnancy – social and family status, disability, disability or any other condition or circumstance.
- Personal retaliation against any person who reports an act or conduct contrary to the law and/or this Code is especially prohibited.
- INCRO respects the private life of the Subject Persons and will not interfere in the activities or conduct they carry out outside the scope of work in the company, provided that such activities or conduct do not affect the performance of their functions within the company, nor harm in any way the good name of INCRO, or its legitimate interests.
- All Subject Persons have the right to sympathize with and belong to a political party, although any activity, militancy in a political party and/or economic contribution to it must be strictly personal and must not interfere with the performance of their functions within the company. It is strictly forbidden to link INCRO with any political party, or with any elected office.

6.1.2. Respect for the Environment and Quality.

INCRO aspires to ensure that the admissible environmental risks are minimal in its activities, both on the property and on the environment, and acquires the firm commitment to use natural resources in the most rational way, thus collaborating with the conservation and protection of the environment, respecting in all cases the applicable regulations on the matter.

6.1.3. Respect for the safety and health of people.

The Health and Safety of people are fundamental values of INCRO and constitute, more than a right, an obligation of all workers and managers and, therefore, compliance with Health and Safety policies is one of the objectives of this Code of Ethics.

The continuous improvement of Safety is a primary objective of this Code and, in this way, each and every one of the Obliged Persons responsible for this matter must guarantee:

- The risk assessment associated with its activities.
- The existence of safety procedures in all centres and for all activities, their in-depth knowledge by all staff, and their strict respect.
- The use of adapted and safe means for all workers.
- Staff training.
- The systematic analysis of accidents and incidents, to strengthen teaching to improve prevention.
- The verification, through audits, of the respect and effectiveness of the Safety Management System.
- Daily communication and awareness in specific aspects of our activities.
- The sharing of experiences between the different work centers.

6.1.4. Honesty and transparency.

Honesty and transparency are two fundamental values that structure our behavior as members of INCRO, and, by complying with them, we generate greater trust among our customers, acquire a greater reputation and consolidate the good name of our company.

By way of illustration and without prejudice to their subsequent development in this Code, the following practices and actions are included that, within the framework of current legislation, are considered in any case prohibited for Obliged Persons in the performance of their functions for INCRO:

- Prohibition of fraudulent practices or deceptive promises.
- Prohibition of benefiting from possible particular opportunities.
- Prohibition of bribery, corruption and illegal commissions.
- Prohibition of using internal information to favor particular interests.
- Prohibition of contributions to political parties or organizations.
- Control of donations to charities, sponsorships and collaborations.
- Prohibition of money laundering.
- Prohibition of accepting gifts or invitations in the exercise of the activity for purposes unrelated to the interests and benefit of the company.
- Prohibition of offering gifts or invitations to third parties for personal purposes unrelated to the interests and benefit of society.

In addition, Subject Persons have the following duties, without prejudice to their subsequent development in this Code:

- To defend and protect the reputation of the Company, being aware of our responsibility as ambassadors of the company and its values.

- To handle in an appropriate and careful manner the internal information provided for the performance of our work, especially when it is of a sensitive, strategic or confidential nature.

6.1.5. Conflicts of interest.

Subject Persons are strictly prohibited from personally benefiting from possible opportunities that arise within the framework of professional activity or through the use of INCRO's assets or information, as well as benefiting third parties with them.

A conflict of interest exists when, in the performance of functions related to INCRO, it determines a conflict between the personal interests of the members of the company, their relatives or third parties with whom they are linked, and the interests of INCRO, that is, when any action or omission may cause damage to the company (including consequential damage and loss of profit) and a direct or indirect benefit for said person. These situations should always be avoided without exception.

In the event of a conflict of interest, the person affected by such conflict must refrain from intervening and/or participating in the negotiation, transaction, project or operation in question. Thus, the Persons Obliged to this Code shall refrain from intervening and/or participating in transactions related to INCRO, in which there is any interest of themselves or of any related person or entity.

In particular, with respect to the conflict of interest:

- Without prejudice to financing operations granted within the framework of commercial operations, loans of any type or class of INCRO to Obligated Persons are expressly considered to be cases of conflict of interest. Any financing operation for Subject Persons must be authorized by the Director General, in accordance with INCRO's internal policy.

- The Obligated Persons must not unjustifiably and arbitrarily favour the contracting or commercial relations of INCRO, with themselves, or with family members, or with third parties with whom they have any direct or indirect personal relationship.
- It is totally forbidden for any INCRO worker to receive a gift or advantage, monetary or in kind, from customers, suppliers, contractors or subcontractors.

6.1.6. Protection of INCRO's assets.

All Persons Bound by this Code have the inexcusable obligation to diligently take care of INCRO's goods and assets, which may only be used within the scope of the company's workplaces – with the exception of laptops, mobile phones and tablets, which may be used in accordance with the applicable internal regulations and for the exclusive benefit of INCRO. Theft, robbery and carelessness cause damage to the company and economically damage the entire group and, therefore, the aforementioned acts will be diligently investigated by INCRO.

Obligated Persons who intend to use INCRO's assets or products for charitable work or for a social action must first receive prior authorisation from the General Manager of the company in accordance with the internal regulations that will govern this type of contribution.

In any case, the internal rules for the use of resources, the spending policies, the security rules, the policy for the use of computer resources and the copyright of the programs used in the company must always be respected.

6.1.7. Relations with the Public Administration.

Subject Persons must comply with the applicable regulations. It is essential to respect public bodies, and must provide all the required information, in real time, truthfully and transparently, always acting in accordance with the principles and criteria of good faith.

a) Bribes and bribes.

Monetary payments and other favors that are made in favor of third parties to acquire an illegal or immoral benefit constitute a crime.

Consequently, it is strictly forbidden to offer, deliver, request, receive or accept money or favors of any kind that produces an advantage over the rest of the competitors. Any gifts or favours of any kind in favour of public officials and employees are expressly prohibited.

Public commercial actions in accordance with the uses and customs of the market are exempt from this prohibition.

b) Tax fraud.

Tax fraud, understood as any fraud committed against the public treasury, regardless of its economic amount, in the form of tax evasion or any other form of irregularity that determines damage of any kind to the public treasury, is strictly prohibited.

c) Prevention against money laundering.

INCRO undertakes to comply with the regulations in relation to the prevention of money laundering and the financing of terrorism and other illicit activities, carrying out procedures and protocols for the prevention and detection of suspicious forms of payment.

If any Obligated Person suspects that an act that could constitute an offence or an administrative offence relating to money laundering or terrorist financing or other unlawful activities has been committed by any third party, including a customer, agent or business partner, it must immediately inform the compliance area in order to prevent the reputation, the image and good name of INCRO, may be damaged.

All INCRO employees will ensure compliance with the rules that limit cash payments.

7. POLICY ON THE USE OF COMPUTER RESOURCES, INTERNET AND E-MAIL

INCRO may make available to its workers the computer equipment necessary to carry out the tasks inherent to their job. Such equipment is the exclusive property of INCRO.

The computer equipment may only be used by the employee or manager for personal use partially and, in any case, with scrupulous respect for these conditions of use.

Workers who use the company's computer equipment will be referred to hereinafter as 'User', in the singular, or 'Users', in the plural.

INCRO will provide each User with a username and password with which to access their computer equipment and, where appropriate, the company's Intranet.

INCRO, and the computer personnel designated by it will be solely responsible for defining the basic hardware and software configuration of the computer equipment, as well as for managing Internet access.

All information created, stored and/or sent from INCRO's computer equipment and systems is the exclusive property of INCRO.

Users undertake to comply with the following:

- Users are prohibited from modifying the physical configuration and/or software of the equipment, installing or uninstalling programs or any other type of software, and using or connecting other devices or equipment at the User's initiative.

- In the event that the User detects or suspects the existence of a computer virus or malicious software on their computer, they must immediately notify INCRO, refraining from carrying out any action unless following the instructions of the company or the computer personnel expressly designated by it.
- In any case, in relation to computer equipment, Internet and e-mail, it is strictly forbidden for Users to:
    - Carrying out illicit or illegal activities of any kind and, in particular, accessing or disseminating from the computers content of an offensive, racist, xenophobic, pornographic, sexist nature, advocating terrorism or violating the rights to privacy, honour, self-image or dignity of people.
    - Introducing files, programs, viruses, spyware or any other physical or logical systems into computer equipment that are likely to cause damage to the equipment.
    - Use usernames other than the one assigned.
    - Violate the privacy of INCRO's data, or that of third parties.
    - Accessing computer equipment assigned to other Users without the authorisation of INCRO, S.A.
    - Use the equipment, files, programs and information owned by INCRO, S.A. for its own benefit and/or that of third parties.

Users are informed that INCRO may adopt control and surveillance measures on the devices owned by it, consisting of:

- Access all the information generated, stored or entered on the hard drives of the computers, which they disseminate through professional email accounts and which they access on the Internet from the computer equipment, so that Users will refrain from generating or storing on the computers, or sending from their email accounts assigned by INCRO, or access private content of the same or of third parties on the Internet.

Users may not export or deliver INCRO information to third parties without the express authorization of the Director General.

It is recommended that, as far as possible, when workers travel abroad, they make use of the free WIFI existing in airports, hotels and others, in order to save telephony costs to the company.

8. AUDITING AND ACCOUNTING

INCRO's accounting books must reflect in a transparent, faithful and truthful manner, the financial situation of the company, observing and following the generally accepted accounting criteria, recording such information in real time and without delay.

Legality must be applied in everything related to the conservation of commercial and accounting documents.

9. POLICY FOR GRANTING AND RECEIVING GIFTS, BENEFITS AND ADVANTAGES

Our objective is to promote good practices in relation to the promise, offering, delivery and/or granting of gifts or benefits by any Obligated Person, as well as the receipt by the Obligated Persons of gifts, benefits or advantages from customers or suppliers, current or potential, of the company.

- Giving gifts and granting benefits or advantages:

In general, it is strictly forbidden that, outside their strictly private sphere, Subject Persons give gifts or grant benefits or advantages in favor of

third parties, including all other Subject Persons. Only in exceptional circumstances, such as anniversaries, commemorations or special dates, may gifts be given or benefits or advantages granted when their amount is less than three hundred euros (€300) and provided that such generosity has been previously approved in accordance with INCRO's internal regulations, referring to the gift policy that will establish as a general principle that any gift, benefit or advantage must be previously approved by the Director General.

For the calculation of the price of the gift or the amount of the benefit or advantage, its total value as a whole will be taken into consideration; and in the event that several gifts are made and/or several different advantages and/or benefits are granted to the same third party (or related persons) within the same calendar year, the lump sum of all of them will be computed.

Without prejudice to the foregoing, the following cases are expressly excluded:

- The gifts, benefits or advantages contemplated in the promotional programs and activities approved in writing in accordance with INCRO's internal regulations.
- Gifts of promotional material that are made within the pre-established framework in accordance with INCRO's internal regulations.
- The benefits or advantages established in favour of customers based on the commercial policies that have been approved in writing in accordance with INCRO's internal regulations, or agreed with the brands.
- The person interested in making the corresponding gift, benefit or advantage must document in writing the justification for carrying out such action, by keeping the document by which the gift, benefit or advantage is considered approved, or by means of a declaration by the person in charge indicating that the aforementioned gift, benefit or advantage complies with the provisions of this Code of Ethics and the rest of INCRO's internal regulations.

  Failure to comply with this obligation will be considered a serious breach of the provisions of this Code of Ethics, with the consequences set out herein.

- Receiving gifts, perks, and benefits.

In general, it is expressly forbidden for Obligated Persons to receive gifts, advantages or benefits from customers and people who work, provide their services or supply their products for INCRO, whether current or potential.

Notwithstanding the foregoing, the Obligated Persons are authorized to receive gifts, advantages and/or benefits made within the framework of a corporate or institutional policy of the grantor, in a manner not individualized for the recipient, of a generic nature, and at specific times such as anniversaries, commemorations, corporate events, Christmas or other festivities. The price of the gifts must always be less than 300 euros (€300) and if it is higher, the recipient of the gift must inform the Director of Regulatory Compliance for the return of the gift or, where appropriate and if so agreed by INCRO's internal regulations, for its raffle among the company's employees. For the calculation of the price of the gift or the amount of the benefit or advantage, its total value as a whole will be taken into consideration; In the event that several gifts are received and/or several different advantages and/or benefits are granted by the same grantor (or related persons) within the same calendar year, the total sum of all of them will be computed.

The attendance of Obligated Persons at corporate recreational events, sporting or cultural events organised by INCRO's clients or suppliers is considered a gift, and their acceptance and participation is conditional on the same principles set out in this Code. In any case, the Obligated Person must inform the Director-General in advance and that the latter authorises the Obligated Person's attendance at the act or event in question.

The General Manager may establish exceptions to the rules of this section if there are well-founded reasons that advise it, in accordance with the internal regulations of the company and what can reasonably be considered an acceptable practice.

10. PRIVACY AND CONFIDENTIAL INFORMATION. INTELLECTUAL AND INDUSTRIAL PROPERTY PROTECTION

In such an interconnected society in which access and dissemination of information is increasingly easy and fast from anywhere on the planet, protecting INCRO's personal and business data is one of our main assets. Therefore, preserving the confidentiality of INCRO's own information, as well as that relating to our shareholders, suppliers and customers, is one of the fundamental pillars on which we build the relationship of trust, which is the essence of our activity. Under this Code, all Obligated Persons shall:

- To communicate the cases of disclosure of confidential information that comes to the knowledge of employees.
- Not using and returning the information at the end of the relationship with INCRO. The material supports - written, computer or any other type - of Privileged or Relevant Information, will be strictly confidential.

- ***Privacy***.

All processing of personal data by INCRO, and/or the Obligated Persons will be carried out with the utmost respect for the privacy of the data subjects, especially with regard to honour and personal and family privacy and in strict compliance with the regulations on the processing of the data of natural persons.

In particular, the processing of personal data must be adequate, relevant and not excessive in relation to the scope and the determined, explicit and legitimate purposes for which they have been obtained; the data must be stored in such a way as to prevent unauthorized access and transfer; Sensitive data such as ideology, beliefs and health should be particularly protected; and the exercise by the

interested parties before INCRO, of the rights recognized by the regulations on the protection of personal data.

- ***Use of Information***.

Only and exclusively the information received from customers, suppliers and employees may be used for the fulfillment of the purpose for which it was transmitted, all under due respect for the regulations in force in this matter and the confidentiality agreements signed by INCRO, where applicable.

Before communicating information to third parties, each Subject Person must ensure that he or she is authorized to do so by his or her direct superior with the rank of director and that he or she does so on behalf of persons who have a legitimate reason to know or participate in it. Even if authorized, it is mandatory to limit the information to be communicated as strictly necessary. In case of any doubt or question, before transmitting the information, you should consult the Director General.

- ***Contractual and accounting documentation***.

The Obligated Persons must be especially diligent in the treatment of INCRO's contractual and accounting documentation and, in any case, must refrain from destroying, altering, hiding and/or manipulating any contractual or accounting document to hinder, obstruct or prevent any investigation that may be carried out by the company itself or by judges, prosecutors, State security forces and bodies and/or the competent regulatory bodies.

The filing, custody, conservation and destruction of contracts and other contractual documentation shall be carried out in accordance with the instructions and instructions of the Director-General or the person delegated by him. Similarly, the filing, custody and preservation of financial and accounting information shall be carried out in accordance with the guidelines and

instructions from the Director General of INCRO, or the person delegated by him. Such archiving and custody will always take place in facilities under the control of INCRO.

- ***Confidential Information***.

The term confidential information refers to any data and information of INCRO, its shareholders, its suppliers, its customers or third parties, including copyrighted information, patents, techniques, models, inventions, know-how, processes, algorithms, programs, executables, research, design details, tax and financial information, list of customers, suppliers, investors, employees, remuneration policy, business and contractual relationships, business forecasts and market plans. In any case, it must be presumed that all the information that is handled or received is Confidential Information.

- ***Obligation to protect the confidentiality of information***.

The Obligated Persons are obliged, during their relationship with INCRO, and even after it, indefinitely (unless an agreement establishes a specific term), not to disclose the Confidential Information to which they have accessed by reason of the relationship maintained, nor to make any use of it for purposes other than said relationship, as well as, where appropriate, to contractually impose the same obligation on its staff. It will also be mandatory to sign confidentiality agreements and clauses in contracting with third parties on behalf of INCRO, if relevant information is provided within the framework of said relationship.

11. COMPLIANCE OFFICER

The function of controlling the implementation, development and compliance of the INCRO Crime Prevention Program corresponds to the Director of Compliance with autonomous powers of initiative and control, in charge of supervising and ensuring the operation of the system and of this Code.

It is the responsibility of the Director of Regulatory Compliance to inform the Director General of any irregularity detected in the operation of the Prevention Model and to offer proposals for action to the aforementioned Director, since he is the person with sanctioning powers, including the establishment of precautionary measures if necessary.

The Director of Regulatory Compliance, if he deems it appropriate, may carry out investigations if there are indications to do so. To this end, an external investigator will be appointed who must carry out the appropriate proceedings and actions with the utmost speed and thoroughness and, where appropriate, will adopt precautionary measures when necessary. The procedure will be carried out under the strictest confidentiality.

12. WHISTLEBLOWING CHANNEL

12.1Purpose of the whistleblowing channel

These regulations on the operation of the whistleblowing channel emphasise the importance of adequate protection of the whistleblower against reprisals that they may suffer in a work or professional context, after using the whistleblowing channel, reporting serious or very serious criminal or administrative offences.

With the aim and purpose of strengthening the culture of whistleblowing by obliged entities, integrity infrastructures and the promotion of the culture of the use of the whistleblowing channel as a mechanism to prevent and detect threats to the private and public interest, as well as with the aim of enforcing and respecting the content of this code of ethics, national legislation and any actions or omissions that may constitute infringements of European Union law provided that:

1.º fall within the scope of the European Union acts listed in the Annex to Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of EU law.

Union, regardless of the classification made of them by the domestic legal system.

2.º affect the financial interests of the European Union or,

3.º have an impact on the internal market, as referred to in Article 26(2) TFEU, including infringements of the European Union's competition and aid rules granted by States, as well as infringements relating to the internal market in relation to acts infringing corporation tax rules or practices aimed at obtaining a tax advantage that undermines the object or the Purpose of the legislation applicable to corporation tax.

b) Actions or omissions that may constitute a serious or very serious criminal or administrative offence. In any case, all serious or very serious criminal or administrative offences that involve economic damage to the Public Treasury and Social Security will be understood to be included.

For all these reasons, INCRO establishes a Whistleblowing Channel (https://canaldedenuncia.es/INCRO) to facilitate anonymous and in any case confidential and highly secure communication to Obliged Persons of all those facts or acts that violate this Code, the regulations or any other irregularity that may pose a high risk to the company. Fundamentally affecting two aspects:

a. The prohibition of retaliation, with the company having to protect people who, in a work or professional context, detect serious or very serious criminal or administrative offences and report them through the mechanisms regulated therein.

b. The prohibition of the presentation of false complaints and the presentation of evidence obtained illegally. Good faith, the honest awareness that serious harmful events have occurred or may occur is an essential requirement for the protection of the whistleblower. That good faith is the expression of their civic behaviour and is opposed to other actions that, on the contrary, it is essential to exclude from

protection, such as the submission of false or distorted information, as well as information that has been obtained illegally.

The policy of use, the rules of the Whistleblowing Channel and any other relevant information to understand the system are available to all users on the web platform that acts as support for the whistleblowing system.

12.2. People who can report:

Any subject bound by the INCRO Code of Ethics has the inexcusable obligation and the legal duty to report internally any reportable fact of which he or she is aware. Notwithstanding the foregoing, an internal complaint may also be filed by any person who has knowledge of the commission of a reportable act, without it being necessary for him or her to hold the status of Subject Person.

In the same way, the following may report:

- Volunteers
- Fellows
- Workers in training periods, regardless of whether or not they receive remuneration, as well as those whose employment relationship has not yet begun.
- The legal representatives of the workers in the exercise of their functions of advising and supporting the informant.
- Individuals who, within the framework of the organisation in which the informant provides services, assist the respondent in the process.
- Natural persons who are related to the whistleblower and who may be subject to retaliation, such as co-workers or family members of the whistleblower, and
- Legal entities, for which you work or with whom you have any other type of relationship in a work context or in which you hold a significant participation.

12.3. Measures for the protection of affected persons.

During the processing of the file, the persons affected by the communication will have the right to the presumption of innocence, the right of defense and the right of access to the file in the terms regulated by law, as well as the same protection established for informants, preserving their identity and guaranteeing the confidentiality of the facts and data of the procedure.

The compliance officer is responsible for receiving and processing the complaints that users make in the Whistleblowing Channel for their resolution and establishing the necessary control procedures.

12.4. Complaint

The whistleblowing channel through the web form **https://canaldedenuncia.es/INCRO** is accessible to all members of the company, guarantees the confidentiality of the data, boasts good monitoring practices, allows anonymous communication and ensures independence and confidentiality since it is managed by an external advisor. In the same way, the internal channel enables the filing of complaints through written or verbal communications, or both. The information may be made either in writing, by post, through any electronic means enabled for this purpose or verbally, by telephone or through a voice messaging system. At the request of the informant, it may also be presented through a face-to-face meeting within a maximum period of seven (7) days.

Where appropriate, the complainant is warned that the face-to-face communication will be recorded and will be informed of the processing of their data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016.

In turn, it is reported that people who wish to report may do so in a clear and accessible way, on the external channels of information before the competent authorities.

When reporting, the whistleblower may indicate a postal address, an email address or a safe place for the purpose of receiving notifications of the person handling the complaints.

Verbal communications, including those made through a face-to-face meeting, by telephone or by voice messaging system, must be documented in one of the following ways, with the consent of the informant:

a) By recording the conversation in a secure, durable, and accessible format, or

b) through a complete and accurate transcription of the conversation made by the personnel responsible for processing it.

Without prejudice to the rights that correspond to them in accordance with data protection regulations, the informant will be offered the opportunity to check, rectify and accept the transcription of the conversation by signing.

All internal complaints must contain, as a minimum, (i) the identification data of the accused – name, surnames – and (ii) the facts reported, specifying, as far as possible, the infraction allegedly committed.

12.5. Test Principle

Any person who makes a complaint must have reasonable indications to support it, so that his complaint must be accompanied by a principle of proof that proves the facts, at least indicatively.

Any evidentiary material permitted by law, preferably in documentary format, will be considered a valid principle of evidence, although witness evidence - including the testimony of the complainant himself - and instruments for the reproduction of words, images and sounds will also be admissible.

In any case, any evidence must have been obtained by the complainant in a lawful manner, that is, with respect for the law and constitutional rights and principles.

12.6. **Admission for processing**

Complaints will only be admitted for processing in the event that they comply with the provisions of these rules, the admission for processing must be notified within a period of no more than seven (7) days.

12.7. Correction of defects

In the event that a correctable defect has been incurred when making the complaint, the person receiving the complaints will inform the complainant, provided that he/she provides his/her data, of the need to correct the defect(s) within seven (7) working days to the complainant, which will begin to count the day following the communication. The complainant will be warned that if the complaint is not corrected within the established period, the complaint may be archived.

12.8. Archive

If the complaint does not comply with the provisions of this Policy, for whatever reason, or if the defects noted in the complaint have not been corrected, the external lawyer *(Ombudsman*) who processes the complaint channel will proceed to file it.

12.9. Opening of the file

If the *Ombudsman* admits the complaint for processing, the Director-General will proceed to open a file in which any appropriate actions may be carried out and the evidence deemed necessary for the due clarification and determination of the facts may be taken.

The term for the processing of the file may not exceed three (3) months from the date of its opening. If the investigation carried out by INCRO or by an external consultant requires, due to its complexity (economic, personnel, etc.), an extra period, the processing may be extended for an additional three (3) months.

12.10. Conclusion of the file

The processing of the file will conclude with a report from the Director of Compliance in which he will give an account of the actions carried out to the Director General, the evidence carried out and the facts that can be considered accredited, recording the recommendations that he deems appropriate to make.

12.11. Report elevation

The report will be submitted to the Board of Directors of INCRO, which may adopt the legal measures it deems appropriate.

12.12. Notification to the person or persons reported

The person or persons reported shall have the right to know that they have been reported and shall be notified of the existence of the complaint and of a summary of the facts reported as soon as possible and, in any case, within a maximum period of fifteen days
(15) days from the date the complaint was received.

The notification addressed to the person or persons reported shall not include the details of the complainant.

12.13. Communication through the external information channel of the Independent Authority for the Protection of Whistleblowers, A.A.I. or through the regional authorities or bodies

Similarly, any natural person may report/report to the Independent Authority for the Protection of Whistleblowers, A.A.I., or to the corresponding authorities or regional bodies, of the commission of any actions or omissions included in the scope of application of the Law, either directly or after notification through the corresponding internal channel.

When the complaint is filed with the A.A.I., it will be followed by the procedure established in article 17 and following of Law 2/2023, of 20 February, regulating the protection of people who report regulatory breaches and the fight against corruption.

12.14. Whistleblower support measures

Persons who report or disclose infractions may have the following support measures:

a) Comprehensive and independent information and advice, which is easily accessible to the public and free of charge, on available procedures and remedies, protection from retaliation and the rights of the person concerned.

b) Effective assistance by competent authorities to any relevant authorities involved in their protection from retaliation, including certification that they are eligible for protection.

c) Legal assistance in criminal proceedings and cross-border civil proceedings in accordance with Community law.

d) Financial and psychological support, exceptionally, if so decided by the Independent Authority for the Protection of Whistleblowers, A.A.I. after assessing the circumstances arising from the submission of the communication.

e) All this, regardless of the assistance that may correspond under Law 1/1996, of 10 January, on free legal assistance, for representation and defence

in judicial proceedings arising from the presentation of the communication or public disclosure.

The support measures will be provided by the Independent Authority for the Protection of Whistleblowers, A.A.I., in the case of infringements committed in the private sector and in the state public sector.

13. SANCTIONING REGIME

Failure to comply with the Code of Ethics by a Subject Person, depending on the specific circumstances, will lead to the reparation of the damages that such breach may cause to INCRO, as well as to the termination of the contractual relationship with the company or, in the event of an employment relationship, to the adoption of disciplinary measures. including dismissal.

Cases of non-compliance with the Code of Ethics will be considered, among others:

- Failing to comply with any of the obligations, duties and prohibitions imposed by the Code.
- Inducing third parties to breach the Code.
- Covering up third parties who have failed, are failing to comply or are going to fail to comply with the precepts of the Code.
- Lack of cooperation in the investigation initiated by INCRO, or by any law firm or external consultant hired for this purpose.
- Retaliate against any Subject Person who has reported or reported, in good faith, a breach of the law and/or the Code.

14. TRAINING

The Director General will adopt the necessary measures and/or resources to ensure adequate training and information for the Obligated Entities under this Code of Ethics, with the aim of allowing and facilitating compliance with these Rules, understanding the operation of the INCRO Prevention Model, and providing the collaboration required to achieve a successful culture of respect and compliance.

15. ENTRY INTO FORCE AND DISSEMINATION

This Code of Ethics is mandatory from its entry into force, from the day following its delivery by hand or by email to the subject persons, and must be disseminated to all of them and published on the INCRO website, in order to facilitate its reading by any person.

16. REVIEW AND UPDATE

These standards must be verified periodically through updating procedures. Its eventual modification will seek an ideal adaptation to the reality of INCRO, especially when relevant infringements of its provisions arise, or when there are changes in the organization, in the control structure or in the activity carried out that make them necessary.