



INTERNAL WHISTLEBLOWER
DEFENCE AND INFRINGEMENT
REPORTING SYSTEM POLICY

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1. PURPOSE

The purpose of this policy is to set out the general principles behind the Internal Reporting System of the corporate group Gransolar (the "**Organisation**"), in accordance with the provisions of Spanish Act 2/2023, of 20 February on the protection of persons who report regulatory infringements and the fight against corruption (the "**Whistleblower Protection Act**").

In line with the Organisation's culture of compliance and business ethics, as evidenced, *inter alia*, by its Criminal Compliance Model ("**CCM**"), the Internal Reporting System has a dual objective: on the one hand, to protect individuals who report violations within its scope and, on the other hand, to strengthen and promote the culture of information and communication as a mechanism for preventing, detecting and reacting to irregular conduct.

2. SCOPE

This policy shall apply to the parent company of the Gransolar Group, as well as to all other companies of the Organisation. The geographical scope of application of this policy shall be national and international. If necessary, specific regulations or procedures applicable to the Organisation's companies subject to the legislation of any non-EU country or any country that, although a member of the EU, has its own legislative framework with its own specifications, will be drawn up.

For the purposes of this policy, the acts or omissions referred to in Section 2 of the Whistleblower Protection Act, as well as any conduct contrary to the law, to the principles and values defined by the Organisation as set forth in the Code of Conduct and in the corporate policies of the Organisation, CCM and the measures included therein, the prevention protocols against harassment at work, sexual or gender-based harassment, sexual violence and violence against LGBTBI persons that the Organisation has in place, or any other measures implemented to prevent any conduct contrary to the above.

Such infringements may be reported even if they were committed by third parties outside the Organisation, provided that such third parties are involved in the exercise of corporate activities on behalf of the Organisation.

This policy applies to whistleblowers, i.e. any natural person who reports a potential infringement in an employment or professional setting within the meaning of Section 3 of the Whistleblower Protection Act.

All members of the Organisation have the obligation to report any conduct contrary to, or indication of the commission of any conduct contrary to the Code of Conduct and the Organisation's corporate policies. In particular, all addressees of the Organisation's CCM are required to report any conduct that may violate the CCM and its policies.

3. THE INTERNAL REPORTING SYSTEM (IRS)

The IRS is composed of the communication channels set up for the reception of reports of infringements, the IRS Responsible and the procedure to be followed for the processing of such reports known as the "*Information management procedure for the Internal Reporting System*" (the "**IRS Procedure**").

3.1. General principles and guarantees

All actions carried out within the framework of the IRS will be carried out securely, in accordance with the criteria of proportionality and objectivity, with the utmost respect for the legislation in force and in full respect of the rights of all parties involved.

In any case, the confidentiality and the rights to privacy, integrity, defence and presumption of innocence of the persons involved in the investigation brought as a result of the receipt of a report through the Organisation's IRS shall be guaranteed.

Reports may be written or oral and may be anonymous.

The identity of the whistleblower, if known, and of the third parties identified in the communication, may only be disclosed to the judicial authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or sanctioning investigation, after informing the whistleblower or the third party concerned, provided that this does not jeopardise the ongoing investigation or judicial proceeding.

Actions aimed at verifying and clarifying the facts disclosed in the communications received must be carried out in compliance with all the guarantees expressly provided for under the IRS procedure for the persons concerned.

The person reported has the right to be informed of the facts against him/her and to be heard at any time.

Investigations shall be conducted as diligently, expeditiously and effectively as possible, taking into account the complexity of the facts, and in any event in accordance with the time limits set forth in the IRS Procedure.

3.2. Reporting channels

The IRS should be used as the preferred channel for reporting infringements through the internal channel established by the Organisation, given that a diligent and effective action by the Organisation could bring to a stop the damage caused by the actions under investigation.

The channel enabled in the Organisation's IRS for the communication of information relating to potential infringements is the **Gransolar Whistleblowing Channel**, guaranteeing confidentiality and anonymity, if so desired.

This internal channel is securely designed to guarantee the confidentiality of the identity of the whistleblower, the person reported and any third party mentioned in the communication, as well as the protection of personal data, preventing access by unauthorised personnel.

Without prejudice to the preferential nature of the aforementioned internal channel, whistleblowers may also access the existing channels established by the Public Authorities for this purpose ("external channels"), either directly or following a communication submitted through the internal channel, in order to report any potential infringements pursued by the Whistleblower Protection Act.

3.3. IRS Responsible

The Organisation's Managing Body has designated as the IRS Responsible a collegiate body composed by the person holding each of the following positions within the Organisation: the Quality Manager, the Chief Technical Officer and the Head of the CEO's office.

The list of current members of the IRS Responsible is set out in **Annex I**.

The IRS Responsible shall delegate to one of its members the authority to manage the IRS and to process investigation files.

The IRS Responsible shall notify to the Independent Whistleblower Protection Authority, both the list of the members of the IRS Responsible and to whom of its members the IRS Responsible delegates the authority to manage the IRS and to process investigation files, within 10 days as from the date of the corresponding designation.

The IRS Responsible shall diligently assume, in the absence of any conflict of interest, the management of the information received through the established channel, ensuring the proper application of the IRS Procedure and including the relation with any service providers that may act within the framework of the collection or processing of communications.

The IRS Responsible shall also keep a register of the information and communications received and of the Investigations arising therefrom, and shall keep such information confidential.

The IRS Responsible shall have at his/her disposal the material and human resources necessary for the proper discharge of his/her duties, which he/she shall carry out autonomously and independently of the remaining bodies of the Organisation. His/her actions shall be governed by the general principles set out in this Policy.

3.4. Procedure

The IRS Procedure regulates the management and processing of communications received through the Organisation's Internal Reporting System.

The actions carried out to verify and clarify the facts contained in the communications received through the internal channel established by the Organisation shall make up the Investigation Files, as regulated in the IRS Procedure.

If the facts on which the information is based are suspected of constituting a criminal offence, the IRS Responsible shall inform the Public Prosecutor's Office or the European Public Prosecutor's Office, as appropriate, applying in all cases the provisions of the Organisation's "*Special protocol for internal investigations concerning legal entities*".

4. WHISTLEBLOWER PROTECTION

Whistleblowers shall act in good faith. Reports shall be made in accordance with the criteria of truthfulness and proportionality and shall relate only to facts that have some connection with the Organisation. False or malicious reports or information may give rise to the application of the disciplinary rules in force in the Organisation, as well as to the adoption of the relevant legal actions for any damages that may have been caused.

The Organisation shall not take (and shall ensure that its Personnel do not take) any form of direct or indirect retaliation measures, including threats or attempts at retaliation, against any person who reports or discloses any infringement under Section 2 above in the following circumstances:

- a) If they have reasonable grounds to believe, even if they do not provide conclusive evidence, that the information is true at the time of the communication or disclosure and that the information falls within the scope of this Policy.
- b) If the report or disclosure was made in accordance with the requirements of this Policy.

Persons who communicate or disclose the following information are expressly excluded from the protection provided for in this Policy:

- a) Information contained in communications that have been declared inadmissible.
- b) Information related to complaints about interpersonal conflicts or involving only the whistleblower and the persons to whom the communication or disclosure relates.
- c) Information that is already fully available to the public or that is mere hearsay.
- d) Information relating to actions or omissions not covered by Section 2 of this Policy.

For the purposes of this Policy, retaliation means any act or failure to act that is prohibited by law, or that results in direct or indirect adverse treatment that places the individual at a particular disadvantage compared to others in an employment or professional context, solely because of his/her status as a whistleblower or because he/she made a public disclosure.

By way of example, the following shall be considered to be retaliation:

- Suspension of the employment contract, dismissal or termination of the employment relationship, including non-renewal or premature termination of a temporary employment contract after the probationary period, or premature termination or cancellation of contracts for goods or services, imposition of any disciplinary measure, demotion or refusal of promotion, and any other substantial change in working conditions, and failure to convert a temporary employment contract into an indefinite employment contract when the employee had a legitimate expectation of being offered an indefinite employment contract; unless these measures were taken as part of the normal exercise of management powers under labour law, as a result of circumstances, facts or proven infringements, and were unrelated to the submission of the report.
- Damage, including reputational damage, or economic loss, coercion, intimidation, harassment or ostracism.
- Negative appraisals or references with regard to work or professional performance.
- Blacklisting or dissemination of information in a particular sector, which makes it difficult or impossible for the person to gain access to employment or to contract for works or services.

- The refusal or withdrawal of a license or permit.
- Refusal of training.
- Discriminatory or unfavourable or unfair treatment.

The Whistleblower Protection Act also provides for a number of support and protection measures for whistleblowers who report the acts or omissions listed in Section 2 of the Act. These measures, which will be provided, where appropriate, by the Independent Whistleblower Protection Authority or any other competent authority or body, are as follows:

- Support measures:
 - o Full, independent and free information and advice on the procedures and remedies available, protection against reprisals and the rights of the person concerned.
 - o Effective assistance by the competent authorities to any relevant authority involved in their fight against retaliation, including certification that they are eligible for protection under the Whistleblower Protection Act.
 - o Legal assistance in criminal proceedings and cross-border civil proceedings in accordance with EU law.
 - o Financial and psychological support, on an exceptional basis, if so decided by the Independent Whistleblower Protection Authority following an assessment of the circumstances arising from the submission of the report.
- Protective measures:
 - o The whistleblower shall not be deemed to have breached any restriction on disclosure of information, and shall not incur any liability whatsoever in connection with such communication or public disclosure, provided that the whistleblower had reasonable grounds to believe that the communication was necessary to disclose an infringement, as defined in the Whistleblower Protection Act. This shall not affect criminal liability.

The provisions of the preceding paragraph shall apply to disclosures made by employee representatives, even if they are subject to statutory obligations of confidentiality or not to disclose confidential information. This is without prejudice to the specific protection rules applicable under labour legislation.

- o The whistleblower shall not be liable for acquiring or accessing the reported information, provided that such acquisition or access does not constitute a criminal offence.
- o In any proceedings before a court or other authority regarding damages suffered by the whistleblower, once the whistleblower has reasonably established that he or she has made a report and suffered such damages, it shall be presumed that the damage was caused in retaliation for the whistleblowing. In such cases, the burden of proof shall be on the person who initiated the harmful measure to prove that such measure was based on duly justified grounds unrelated to the report.

- The whistleblower and those persons to whom the whistleblower's protection is legally extended shall not be liable in any legal proceedings, including those for defamation, copyright infringement, breach of confidentiality, breach of data protection regulations, disclosure of trade secrets, or claims for damages based on labour or statutory law. The whistleblower and the persons to whom the protection of the whistleblower is lawfully extended shall be entitled to plead in their defence and in the aforementioned legal proceedings that they made the disclosure based on their understanding that the disclosure was necessary to bring to light an infringement under the Whistleblower Protection Act.

5. AVAILABILITY OF INFORMATION

The IRS Responsible shall ensure that the necessary information is provided in a clear and easily accessible manner so that whistleblowers can make use of the Organisation's communication channels.

Such information is contained in this Policy which, in turn, is further developed in the IRS Procedure. Both documents are available on the Organisation's corporate website at www.gransolar.com.

6. PROTECTION OF PERSONAL DATA

The processing of personal data within the IRS shall be conducted in full compliance with the general principles and obligations established in all personal data protection regulations including Spanish Act 2/2023.

In accordance with the provisions of Spanish Act 2/2023, the controller of personal data collected through the IRS is the Managing Body, which is ultimately responsible for ensuring that the IRS complies with the general principles and obligations established therein.

The Managing Body may establish systems of joint control with the Organisation whenever the execution of an agreement to delegate to third parties the management of privacy obligations is mandatory.

Annex I

Members of the IRS Responsible

- Quality Manager: Alexandr Sidorenko
- Chief Technical Officer: Ivan Arkipoff
- Head of the CEO's office: Rocío de Luis



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