

Data Protection and Use Conditions of the Whistleblowing Channel:

Aspects to report using the Whistleblowing Channel

Anyone having a relationship with Incatema Consulting & Engineering is bound to:

- Report in good faith and on the grounds of reasonable signs those circumstances which may represent a criminal risk or risk of bribery for the organisation as well as breaches or weaknesses of the compliance and anti-bribery management system.
- Report any suspicion or evidence of offence/bribery committed by peers or third parties as well as comply with the ethics code and integrated policy.
- Report any criminal act or behaviour which contravenes the current legislation or Incatema's corporate principles.

Reporting procedure

There is a direct and confidential channel with the Compliance Officer for these purposes using the form of the website available here: <https://app.laworatory.com/ethical-channel/incatema>.

Should it be impossible for technical reasons to send the report through the email address mentioned, it shall be sent by postal mail to Calle Poeta Joan Maragall 1, 10ª Planta, 28020, Madrid, to the attention of the Compliance Officer or directly to the Compliance Officer.

Processing of reports

All reports received through the whistleblowing channel will be duly processed as per the procedures established by Incatema respecting the rights of the reporter and reported person as described below.

Guarantees

All those who in good faith send their reports will be provided with the following guarantees:

- Confidentiality of the identity of the Reporter not disclosing researches to other employees or Incatema's representatives.
- Protection of identity with maximum confidentiality (unless legal/judicial obligation) both of acts and personal data of all those who may be involved in the action reported.
- Protection against any sort of retaliation or negative consequence and/or sanction in the context of the report/request made unless the internal research determines that the report has been made aware of its misrepresentation or with reckless disregard of the truth, bad faith or abuse of law.
- Processing of personal data pursuant to Data Protection Legislation.
- Use of the information provided in a report only for legitimate purposes with respect to the investigation to be opened.
- Guarantee of the presumption of innocence right, right to access the case and right to defend the subject investigated.

Data Protection in the Whistleblowing Channel

Incatema's Whistleblowing Channel fulfils Organic Law 3/2018 on Data Protection and Guarantee of Digital Rights and with the General Regulation on Data Protection. Thus the periods for conservation and requirements of information to interested parties have been established as per article 24 of the LOPDGDD.

Persona data provided within the context of reports and obtained as a result of the relevant internal investigation will be treated solely for their management.

Holders of Personal Data may exercise their rights of access, rectification, cancelation and opposition as per the provisions of the regulations in force of personal data protection by sending an email to the address: compliance@incatemaconsulting.es.

In any case once three months have elapsed from the incorporation of the information to the Whistleblowing Channel, they shall be erased from the reporting system unless the purposes of the conservation is to leave evidence of the operation of the model for crime commission prevention by the entity. All reports which have not been processed may appear as anonymous.

Once the period aforementioned has elapsed the information may continue being processed by the relevant body for the research of the facts reported, not being stored in the information system of internal reports.

Personal data which are not appropriate for the processing of a specific case will be immediately deleted.