

## 01 What should be reported:

Always report in good faith on facts performed by employees, suppliers or third parties with which the Ingeteam Group maintains a direct employment, business or professional relationship related to:

- Non-compliance with the Code of Conduct or any other policy or procedure of the Ingeteam Group.
- Breaches of the regulations and current legislation in the labor, civil or criminal law of which they have knowledge and that impact on the Ingeteam Group.
- Any doubt or suspicion about economic or reputational damages, materialized or potential, to the Ingeteam Group.

## 02 Who should communicate or report:

All employees of the Ingeteam group have the obligation to communicate and report independently of their hierarchical level and geographical location, as well as suppliers or third parties with a direct relationship and legitimate commercial or professional interest.

## 03 Where to make the complaint:

The complaints and communications are raised through the Whistleblower Channel through the following email that will arrive directly to the Compliance and Conduct Committee:

[conducta.corporacion@ingeteam.com](mailto:conducta.corporacion@ingeteam.com)

The alternative is also enabled by postal mail for those who wish to:

**Canal de Denuncias del Grupo Ingeteam  
Comité de Cumplimiento  
Parque Tecnológico de Bizkaia, Edificio 106.  
CP 48170, Zamudio, España - Spain**

## 04 How to make the complaint:

The complaint or communication must be made in writing, there is no established model but it must contain the following information:

- Complete identification of the complainant or whistleblower, his connection to the Ingeteam Group, as well as contact information in case any clarification is necessary and to follow up on it.
- Detailed explanation of the complaint, of the concern or irregularity identified, as well as all supporting documentation or available evidence.
- Where appropriate, identification of those responsible or affected persons.

As a general rule, complaints or communications of an anonymous nature will not be accepted, or where the identification of the complainant is imperfect. However, the Compliance Committee may estimate it after assessing the circumstances and facts of the complaint.

## 05 Reception, processing, investigation and resolution of the communication or complaint:

The Compliance and Conduct Committee of the Ingeteam Group is responsible for receiving the communication or the complaint, as well as its processing and investigation, as appropriate:

- It performs the reception, assessment, processing, investigation and resolution of all types of questions or complaints related to the application of the Code of Conduct or breach of the regulations in force that are received through the Whistleblower Channel or by any other way.
- It establishes the necessary corrective and disciplinary measures, subsequently ensuring the implementation of its resolutions and the execution of its agreements, as well as specific action plans for remediation where appropriate, including the communication to the corresponding Director for the execution of disciplinary sanctions.

## 06 The Compliance and Conduct Committee is formed by:

- President: Corporate International Development Director
- Member: Corporate HR Director
- Member: Corporate Information Technologies Director
- Member: Legal Services Director
- Secretary: Director de Operativa Interna

## 07 Guarantees of non-retaliation and confidentiality

The Board of Directors of the Ingeteam Group protects and strongly supports those who help to prevent irregular behaviour. Every person in the Ingeteam Group must feel untouched of negative consequences derived from a good faith report. In this regard, the Board of Directors expressly guarantees that no retaliation will be taken or adopted by anyone in the organization it has been done in good faith report.

In addition, the Board of Directors guarantees the absolute confidentiality of the identity of the complainant and the data provided, which will be known exclusively by the Compliance and Conduct Committee, by the Investigation team, or, as the case, by the request of the Judicial Authority or by the applicable legislation.