

PRIVACY POLICY OF THE INTERNAL REPORTING SYSTEM

Privacy Policy of the Internal Reporting System

The Internal Reporting System of INTERMAS SETS, S.A.U. – hereinafter INTERMAS – is the channel through which employees, suppliers, customers, and other third parties with a legitimate interest may report irregular conduct, violations of the Code of Ethics, or corrupt behavior within the company that may constitute a criminal offense, in accordance with Law 2/2023, of February 20, on the protection of persons who report regulatory infringements and the fight against corruption.

INTERMAS, with registered office at Ronda de Collsabadell, 11, Polígon Industrial, 08450 Llinars del Vallès (Barcelona), is responsible for processing the personal data provided through this channel and explicitly states that such data may be shared with third parties acting as data processors, to ensure the proper management of the report submitted.

All reports will be treated with the utmost confidentiality and with the aim of investigating, processing, and resolving them, anticipating and, where appropriate, correcting irregular and/or unethical behavior.

This channel may not be used as a suggestion box or a customer service channel.

Personal data will be retained for as long as necessary to decide whether to initiate an investigation into the reported facts. However, if a judicial proceeding is initiated following the investigation, the data may be retained for the additional period required until a final judicial resolution is obtained.

Reports may be submitted anonymously or with identification. In the case of identified reports, protection measures against potential retaliation, as provided for by current legislation, will be applied. Reports must be submitted online via the link provided at the end of this Policy, after accepting its terms. The designated internal reporting system manager will receive the report and, if appropriate, forward it to the Investigative Body, which will follow the internal investigation procedure established.

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Access to the reports will be restricted to:

- The system manager and the members of the Investigative Body.
- The Data Protection Officer or delegate.
- Any data processors or sub-processors who may be designated.

Any report or communication with criminal implications will necessarily lead to the initiation of a case by the Investigative Body and, if applicable, its communication to the law enforcement authorities, public administrations, and/or courts and tribunals.

To be accepted and properly processed, reports must contain the following information:

- Identification of the whistleblower, unless the report is anonymous.
- A brief description of the facts or arguments supporting the report, along with any documents or testimonies deemed appropriate.
- The person or department against whom the report is directed.
- The place or address where the events occurred.

INTERMAS will implement all necessary technical and organizational security measures to prevent alteration, loss, or unauthorized processing or access to this data and thus guarantee its security.

Whistleblowers may exercise their rights of access, rectification, objection, erasure, restriction of processing, and data portability by emailing: rgpd@intermasgroup.com. In the case of anonymous reports, the whistleblower will not be able to exercise the rights mentioned above.