

HIMOINSA GROUP ETHICAL CHANNEL PRIVACY POLICY

1. Normative reference

The personal data processed in the Channel or for the management of the communications made through the Channel or the processing of personal data that is necessary to process and conclude the files of the Consultations and Alerts communicated through the Channel will be carried out with scrupulous respect for and compliance with the regulations on personal data protection, specifically Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, of the Spanish Organic Law 3/2018, of December 5, on the protection of personal data and guarantee of digital rights, Organic Law 7/2021, of May 26, on the protection of personal data processed for the purposes of prevention, detection, investigation and prosecution of criminal offenses and enforcement of sanctions (as applicable) and of Law 2/2023, of February 20, regulating the protection of persons who report regulatory offenses and the fight against corruption.

The Board of Directors of DISMUNTEL S.L. at its meeting held on September 21, 2023, ratified the Ethical Channel Privacy Policy approved by the Group's parent company, Himoinsa, S.L., making this Policy binding on Dismuntel, S.L.

2. Purpose of this Policy

The purpose of this Privacy Policy is to provide users of the Ethical Channel of the Himoinsa Group with the mandatory information on the processing of personal data that occurs with the use of the technological tool designed by Lefebvre - El Derecho S.A. and called Centinela, or for the management of communications that are made through the same, or that are necessary to process and conclude the files of the Consultations and Alerts that are communicated through the Channel.

3. Data Controller

The Data Controller of the Himoinsa Group's Ethical Channel personal data is the management body of the Group's Spanish parent company HIMOINSA, S.L. (hereinafter Himoinsa), with Tax Identification Number B80540222, registered in the Mercantile Registry of Madrid, Volume 6012, Folio 212, Page M-98319 and registered office at Calle Edison, 57, Polígono Industrial Las Mezquitas, 28906 Getafe, Madrid (Spain), which has implemented the necessary technical and organizational measures to preserve the identity and guarantee the confidentiality of the data corresponding to the informants, affected persons and any third party mentioned in the information provided, protect personal data from accidental loss or unauthorized alteration, access, use or disclosure, having also established procedures to react to any security incident that may affect the personal data processed.

The processing of personal data that occurs with the use of the technological tool designed by Lefebvre - El Derecho S.A. and called Centinela, or for the management of communications made through the same, or that are necessary to process and conclude the files of the Consultations and Alerts communicated through the Channel, will be carried out in a lawful, loyal and transparent manner, in accordance with explicit and legitimate purposes, only if they are adequate, relevant and limited to what is necessary in relation to such purposes.

In addition, Himoina will keep your data accurate and up to date, retaining it in a form that permits identification (where applicable) only for as long as is necessary to fulfill the purposes of the processing.

Himoina will formalize, where appropriate, the relevant Agreement of co-responsible for the treatment provided for in Article 26 of the GDPR with each of the Spanish subsidiaries of the Group, thus complying with the provisions of Article 6.2 of Law 2/2023, of February 20.

4. Data Processor

Himoina has contracted with the Spanish company Lefebvre - El Derecho, S.A. (hereinafter LED) with NIF A79216651, registered in the Mercantile Registry of Madrid in Volume 6837, Folio 146, Page M-111.342 and registered office at Calle Monasterios de Suso y Yuso, 34, 28049 Madrid (Spain) the technological tool Centinela, having signed the appropriate processing order agreement and, therefore, acting as Data Processor.

Both LED and, where appropriate, its suppliers (sub-providers), guarantee the implementation of technical and organizational systems as well as the relevant security and privacy measures of the files and personal data processing that are necessary to protect personal data from accidental loss or unauthorized alteration, access, use or disclosure, having also established procedures to react to any security incident that may affect your personal data.

5. Personal data processed and how they are obtained

The personal data that we obtain and that are processed will depend on whether the user of the Himoina Group's Centinela technology tool identifies himself/herself truthfully by name or, on the contrary, chooses to make his/her communication anonymously.

In those cases in which the users choose to identify themselves, the personal data required in the appropriate forms contained in Centinela, such as name and surname, e-mail and telephone number, will be processed. In addition, if third parties are identified by name in the Consultation or Alert, these identities will also be processed through the Channel.

Personal data is therefore obtained through the form that the user submits using the Himoina Group's Centinela tool.

6. Purpose of Processing, Purpose Limitation and Data Minimization

Personal data and, in general, all information of a personal nature provided by the user will be processed for the purpose of managing, investigating and responding, as the case may be, to the Queries and Alerts sent through the Ethical Channel.

Personal data will not be collected if it is not manifestly relevant or necessary to process specific information submitted through the Ethical Channel or, if collected by accident, will be deleted without undue delay.

In any case, personal data that may have been communicated and that refer to behaviors that are not included in the scope of application of the Ethical Channel (Section 3 of the General Policy of the Ethical Channel) will not be processed.

If the information received through the Himoina Group's Centinela tool contains personal data included in the special categories of data (i.e. revealing ethnic or racial origin, political opinions, religious or philosophical convictions, trade union membership, genetic data, biometric data

aimed at uniquely identifying a natural person, data relating to health or sex life or sexual orientation of a person), it will be immediately deleted, without registration and processing.

In any case, the identity provided by a user of the Ethical Channel of the Himoinsa Group will be reserved and confidential, and in no case will it be communicated to the persons to whom the reported facts refer or to third parties, except in the cases indicated in Section 9 of this Policy.

7. Legality of the processing

The legal base of legitimacy for the processing of personal data, according to the purpose indicated in the previous section, are:

- (i) the Controller's legitimate interest in ensuring and monitoring compliance with the Code of Ethical and Conduct of Himoinsa and its Spanish subsidiaries, as well as its internal corporate Policies, Protocols and Procedures;
- (ii) the public interest when it comes to ensuring compliance with legal rules; and
- (iii) compliance with the legal obligation required by Law 2/2023 of 20 February to have an internal information system

8. Limitation of the storage period

The personal data provided when a Consultation is sent through the Centinela tool shall be kept for the period necessary to resolve it and, in any case, for one (1) year from its receipt in order to be able to assess the level of knowledge and implementation of the Code of Ethical and Conduct of Himoinsa and its subsidiaries in the different areas of the organisation during this time. Once this period has elapsed, the data will be duly blocked.

The personal data provided when an Alert is submitted through the Centinela tool will be kept for the time required to decide whether an internal investigation should be initiated in accordance with the provisions of the Ethical Channel Management Procedure and, in any case, once the communication has been accepted for processing, it will be deleted three (3) months after its entry in Centinela, unless their retention is necessary to provide evidence of the operation of the Ethical Channel, the Compliance Management System of Himoinsa and its Spanish subsidiaries, or for investigations and/or risk management within the Compliance Management System, and/or for the adoption of disciplinary measures or for the processing of legal proceedings, in which case they shall be retained for a maximum period of ten (10) years outside the scope of the ordinary management and processing of the Channel

If it is established that the information provided or part of it is not truthful, it must be immediately deleted as soon as this circumstance comes to light, unless this lack of truthfulness could constitute a criminal offence, in which case the information will be kept for the time necessary during the legal proceedings.

Communications that have not been admitted for processing may only be recorded in an anonymous format.

9. Communication and transfer

Access to the personal data contained in the Himoinsa Group's Ethical Channel shall be limited, within the scope of its competences and functions, exclusively to:

- a) The Himoinsa Risk and Regulatory Compliance Committee in its capacity as Head of the Group's Internal Information System and, where appropriate, and whoever manages it directly.
- b) The head of the Human Resources Department of Himoinsa and its Spanish subsidiaries, when disciplinary measures may be taken against an employee.
- c) The person in charge of the Legal Department of Himoinsa and its Spanish subsidiaries if legal action should be taken in relation to the facts described in the communication.
- (d) the persons in charge of processing (Data Processors) that may be appointed from time to time. External experts and lawyers engaged to provide support or to carry out an internal investigation shall have such status and a processing agreement shall be concluded with them
- e) the data protection officer, where applicable.

Apart from these cases, the identity of the informant may only be communicated to the judicial authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or disciplinary investigation.

10. International data transfers

No international transfers of the personal data processed through the Himoinsa Group's Ethical Channel are foreseen. Notwithstanding the foregoing, if exceptionally it were strictly necessary to carry out an international transfer of the personal data undergoing processing, such transfer would be carried out under one of the qualifying circumstances established for this purpose in Chapter V of the GDPR, without prejudice to the applicability, where appropriate, of Article 49(d) thereof, when the international transfer of data is necessary for important reasons of public interest.

11. Exercise of rights

Users of the Himoinsa Group's Centinela technological tool have the right to access their personal data subject to processing, as well as to request the rectification of inaccurate data or, where appropriate, to request their deletion when they are no longer necessary for the purposes for which they were collected, in addition to exercising the right to oppose and limit the processing and portability of their data; however, in the event that the person to whom the facts referred to in the communication refer exercises the right of objection, it shall be presumed that, in the absence of proof to the contrary, there are compelling legitimate grounds for processing his or her personal data.

Users may submit their requests to exercise their rights free of charge by contacting privacy@himoinsa.com in the event that the user has used the Centinela technological tool via the Himoinsa, S.L. website or privacidad@dismuntel.com in the event that the user has used the Centinela technological tool via the Dismuntel, S.L. website.

They also have the right to submit complaints about breaches or non-compliance with personal data protection regulations to the Spanish Data Protection Agency via its website. <https://sedeagpd.gob.es/sede-electronica-web/vistas/infoSede/tramitesCiudadano.jsf> or before any other supervisory authority that may be competent according to the nationality of the data subject, the place from which the data undergoing processing are provided or any other point of connection with such authority in accordance with the legislation applicable in each case.

12. Entry into force, revision and updating of this procedure.

The Board of Directors of HIMOINSA, S.L., at its meeting held on the date 5 th June, 2023, and at the proposal of the Risk and Regulatory Compliance Committee, has approved the present Privacy Policy of the Ethical Channel of the Himoinsa Group.

This Policy must be kept up to date over time and shall be reviewed whenever objective situations or applicable legislation so require, in which case the Risk and Regulatory Compliance Committee shall draw up a proposal for amendment and submit it to the Board of Directors for approval.

The Policy will also be the subject of appropriate communication and training actions.

13. Change Control:

Version	Date	Changes introduced	Items concerned
2.0 Definitiva	21/09/2023	Approval of the original version of the Policy	All