# CORPORATE POLICY ON INTERNAL INFORMATION SYSTEM AND INFORMANT PROTECTION

## AUDAX RENOVABLES, S.A.

## AND ITS GROUP OF COMPANIES

| Version control | | | |
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| **Version** | **Date** | **Controller** | **Action** |
| 1.0 | 18 July 2023 | Internal Information System Manager | Initial design and approval of the Policy of Internal Information System and Informant Protection in accordance with Law 2/2023 of 20 February, on the protection of persons who report breaches of law and on fight against corruption. |
| 2.0 | 25 November 2024 | Group Compliance Officer | Update on the new governance system at Internal information System |

| Approvals | | | |
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| 1.0 | 27 September 2023 | Board of Directors of AUDAX RENOVABLES, S.A. | Approval of the Policy on Internal Information System and Informant Protection |
| 2.0 | 17 December 2024 | Board of Directors of AUDAX RENOVABLES, S.A. | Approval of the update of the Policy on Internal Information System and Informant Protection |

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| Internal Information System and Management of the Whistleblowing Channel Procedure | 17 December 2024 |

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## 1. Introduction and Object

In line with the provisions of the Corporate Code of Ethics and Conduct (hereinafter referred to as the "Code of Ethics") and applicable internal regulations, the Audax Group and all the companies belonging to the Group (hereinafter also: the "Group") strives to develop its professional activity righteously, promoting ethical conduct and respect for human dignity, and upholding legal compliance.

On 16 December 2019, Directive (EU) 2019/1937 (hereinafter 'Directive') entered into force, which aims to encourage whistleblowing and protect whistleblowers from retaliation by establishing effective, confidential and secure reporting channels. This Directive is implemented in the different Member States of the European Union through the national legislation of each State.

In the case of Spain, Law 2/2023 of 20 February, on the protection of persons who report breaches of law and on fight against corruption ("**Law 2/2023**") incorporates to the Spanish law Directive  And the main purpose of aforementioned Law 2/2023 is the protection of persons who, in general, in a work-related or professional context have obtained information about certain breaches of law and have reported it through internal and/or external information channels or, as the case may be, disclosed it publicly, and who shall be granted adequate protection against any type of retaliation.

For this purpose and in compliance with the provisions of Law 2/2023, the Audax Group has implemented a System of Internal Information and Informant Protection (hereinafter also referred to as either the "**System**" or "**Internal Information System**") composed of:

1) The Whistleblowing Channel (hereinafter also referred to as the "Channel") available in the Group since 2018, designed as a formal mechanism of query and communication of irregularities and infractions.
2) The appointed Internal Information System Manager and the Compliance Officers of the Group companies that collaborate with the management of the System.
3) This Corporate Policy on Internal Information System and Informant Protection ("**Policy**").
4) The Internal Information System and Management of the Whistleblowing Channel Procedure, which builds on this Policy (hereinafter: the "**Procedure**").

The Internal Information System is designed to promote the culture of information or communication ("*speak up*") among our stakeholders, both internal and external, encouraging them all to report any concerns they may have about unethical conduct and/or infringements of regulations (internal and/or external) within our professional activity, and to guarantee the protection of the informant against any possible retaliation.

Therefore, this document is conceived as the Corporate Policy on Internal Information System and Informant Protection of the Audax Group, whose aim is to establish the principles and guarantees of the System and, specifically, of the Channel. At the same time, the System and the Channel are additionally regulated by the Procedure.

The Board of Directors of AUDAX RENOVABLES, S.A. launches and approves this Policy, thus fulfilling its duty to establish the bases, set up the instruments and design the mechanisms necessary to attain an adequate and efficient coordination of the activities related to the management of the Internal Information System and the Whistleblowing Channel.

All this is done without prejudice to the autonomous decisions of each company comprising the Group (at the moment of approval of this Policy or in the future), to the adherence or adaptation, which it may need to perform in accordance with the legislation of the country where it operates and the particularities of its line of business.

## 2. Scope of application

This Policy is applicable to all the companies belonging to the Audax Group, subject to the Directive and/or to Law 2/2023, independently of their line of business, geographical location and their corporate structure.

This is without prejudice to the fact that the companies that make up the Audax Group must comply, in all cases, with the regulations corresponding to the country in which they are located, in accordance with the transposition of the Directive and applying the particularities foreseen locally.

The governing bodies of these subsidiary companies belonging to the Group shall make appropriate decisions in order to integrate the provisions of this Policy and of the Procedure in accordance with the applicable legislation, the structure of the governing bodies, commissions and departments, among other factors. This may involve accession and/or incorporation by means of an annex of the special features that may apply.

The Policy is also applicable to all the persons who render professional services to the Group, who have the obligation to act with integrity and always in compliance with the law and applicable internal regulations and shall cooperate in order to avoid unethical conduct and/or infringement of regulations (internal and/or external). In this sense, it is a duty of the directors, managers, employees, collaborators or any other persons maintaining a relationship of hierarchical dependence with the Audax Group, independently of their functional or hierarchical position, type of employment or territory of operation (hereinafter also referred to as the "**Staff**"), to report any unethical conduct and/or infringement of the regulations (internal and/or external) of which they become aware through the Channel.

Additionally, any person (natural or legal) who has had, has or may have any business relationship (or a relationship within a business context) with the Audax Group (hereinafter also referred to as the "**Third Party**") is likewise encouraged to use the Channel in the cases regulated in this Policy and in the follow-up Procedure, as the means of preference for the reporting of irregularities and breaches and independently of other ordinary communication means made available to the Third Parties.

The Staff shall and the Third Parties may communicate their knowledge or reasonable suspicion of unethical conduct and/or infringement of regulations (internal and/or external), including the Code of Ethics.

Specifically, it shall apply to any communications set forth in the Directive and/or in the article 2 of Law 2/2023: Any actions or omissions, which may constitute infringements of the Law of the European Union, as long as they meet the requirements set out in that Law; as well as any actions or omissions, which may constitute serious or very serious criminal or administrative offences, implying an economic damage to the Public Treasury and to the Social Security, including offences related to health and safety in the workplace, all this without prejudice to the protection established in the applicable specific regulations.

The Internal Information System is the means of preference for the purpose of reporting such conduct.

The Channel should not be used to inform about interpersonal conflicts, which do not imply any infringement and/or which concern only the informant and the persons to whom the information refers, nor to inform about issues, which are already fully known to the public, or which are merely gossip.

## 3. Mechanisms for the lodging of queries or complaints in the Audax Group: Whistleblowing Channel

The Audax Group makes available to its Staff and Third Parties various means of communication in order to promote the culture of integrity and communication as a fundamental element of the Internal Information System and the corporate Compliance and Criminal Risk Prevention Model. The Internal Information System will be available through the corporate website of the Audax Group and in some cases through the Employee Portal (or similar tool).

In addition to the various means of communication, the Audax Group has a formal and secure means, by which the queries and complaints may be communicated in writing or verbally, and by which it is also possible to request a personal meeting. All this is possible through:

- **Whistleblowing Channel Platform** of the Audax Group, in writing or by voice recording. The platform belongs to an external provider and is accessible from the corporate website, the Employee Portal (or similar tool) of those companies which have it, as well as through the following link: https://audax.whistleblowernetwork.net.

- **Personal meeting**: the reporting person may request, through the Whistleblowing Channel, a personal meeting with the Internal Information System Manager, which shall take place within seven (7) calendar days from the date of the request.

Regardless of the way the offences are reported, the Audax Group shall conduct an independent, impartial and efficient investigation, ensuring the rights of the parties involved and informing the reporting person about the progress and the result of such investigation in a confidential manner, always in accordance with this Policy and the follow-up Procedure.

Apart from the aforementioned mechanisms of reporting irregularities and offences, which are the preferred means, the government or public administration of each country where the Audax Group is present may have official channels made available to the public. In the case of the European Union, the Member States have appointed competent authorities to whom cases of non-compliance may be reported either directly or through previous complaint in the Whistleblowing Channel of the Audax Group.

The Staff and Third Parties shall receive clear and accessible information through the website and the Channel Platform about such external channels (whenever they are set up and/or their existence is known and/or the communication means or channels are made available).

## 4. Internal Information System and Whistleblowing Channel

The Board of Directors of Audax Renovables, S.A. appoints as Internal Information System and Whistleblowing Channel Manager (hereinafter also referred to as the "Manager") the Audax Group Compliance Officer (hereinafter '**GCO'**), who assumes the role.

The Internal Information System Manager shall perform their duties in an independent way from the rest of the bodies of the Audax Group, may not receive any kind of instructions while carrying out their duties and shall have at their disposal all the human and material resources necessary to perform those duties. The Manager shall also be responsible for diligently carrying out the Procedure.

Although the ISS is unique in the Audax Group, for regulatory, efficiency and proximity reasons and in order to provide maximum protection, Audax has opted for a mixed management model in the sense that the different Compliance Officers of each of the companies that form part of the Group also participate in the management of the System on a delegated basis.

By virtue of the foregoing, in those cases in which a communication is received in the ISS from any of the Group's subsidiaries, the Internal Information System Manager shall delegate such communication to the Compliance Officer of the subsidiary from which it originates so that he/she may process and resolve it, thus adopting the role of Instructor in its management and following the provisions of section I.V of the Internal Information System and Management of the Whistleblowing System. To this end, the corresponding communications shall be sent through the System Platform itself. In the event that the report is received by alternative means, the System Manager must manually enter the report in the Platform and proceed in the same way, forwarding the report to the corresponding Compliance Officer.

On the other hand, annually, and always when necessary, the Manager shall report to the Board of Directors of the parent company of the Group all the required information about the activity of the System and of the Whistleblowing Channel, maintaining in any case the guarantees of confidentiality, anonymity and security of the information, as well as all the other guarantees and users' rights established in this Policy and in the Directive and/or Law 2/2023. Therefore, any procedures and formalities carried out by the local Compliance Officer must be recorded in the System Platform.

Any member of the Staff, individually or collectively, has the obligation to collaborate with the Internal Information System Manager on the terms established in this Policy and follow-up regulations.

For this purpose, there is only one Manager of the Internal Information System for all the Audax Group, without prejudice to any further coordination with the Compliance Officers of the rest of the Group's subsidiary companies in order to ensure proper management of the reported irregularities and offences.

## 5. Principles and guarantees of the Internal Information System and Whistleblowing Channel of the Audax Group

**Legality and corporate ethics**. Independently of the means used to lodge a complaint or a query, its management and processing shall be governed by the applicable legislation, by this Policy and by the Procedure, as well as any specific regulations which may apply.

**Independence and impartiality**. The Internal Information System Manager shall act at all times according to the independence and impartiality principles and with the utmost respect to the applicable legislation and internal regulations of the Audax Group. All the persons involved in the proceedings shall act in good faith in the search for truth and clarification of the facts.

**Transparency and accessibility**. To ensure that the information about the regulation of the System should be transmitted in a clear and comprehensible way, as well as to guarantee public awareness and accessibility of the System and its channels. In particular, the regulation of the Internal Information System and Whistleblowing Channel, including the Policy and follow-up Procedure, shall be published on the corporate website and made accessible through the following link: https://audax.whistleblowernetwork.net. Additionally, it shall also be accessible through the Employee Portal (or similar tool) in the companies where it is available.

At any rate, the Audax Group's Staff shall receive information and training about the Internal Information System and its regulation.

**Traceability and security**. The reports submitted through the Internal Information System shall be registered and processed according to the provisions of this Policy and its follow-up Procedure, without prejudice to the application of any specific regulations. In particular, the complaints made through the Whistleblowing Channel shall be

registered on the Whistleblowing Channel Platform. If the Internal Information System Manager receives a complaint or a query through a channel other than the Whistleblowing Channel, they shall register it manually on the Whistleblowing Channel Platform in order to include there all the reports concerning compliance matters. Likewise, if any member of the Staff of the Audax Group receives information belonging to the objective scope of this Policy, they shall immediately communicate it to the Internal Information System Manager and, in any case, they have the obligation to keep in strictest confidence the information about the facts, the reporting person and other persons involved. Any breach of this obligation will be considered as a serious offence and may result in disciplinary or other applicable consequences.

**Diligence and celerity.** To ensure that the investigation and resolution concerning the reported facts should be processed with due professionality, diligence and without unnecessary delays, so that the proceedings may be completed in the shortest possible time, respecting all due guarantees and within three (3) months at the most, extendable by other three (3) months in complex cases which require such extension.

**Good faith**. Information should be given in good faith, which implies that we should believe that what we communicate is true, even if later it may be proved that the information was incorrect, and without prejudice to the inaccuracies or omissions, which the informant may have committed unintentionally.

**Respect for fundamental rights.** To ensure the right of information, right to a defence, right of reply, presumption of innocence and the right to honour of all the persons who become involved as a consequence of the processing of the information submitted to the System. Moreover, these persons have the right to be heard at all times, in the form considered appropriate in order to ensure the successful completion of the investigation, and to know the actions or omissions (offences) attributed to them through a succinct communication of the facts.

**Prohibition of retaliation**. The persons who make any kind of enquiry or complaint concerning irregular conduct or offences are protected against any form of retaliation in connection with the reports they made. The Group shall proactively protect the persons lodging complaints and shall punish any instances of retaliation against the informants or related persons (natural or legal) or any breach of the duty of confidentiality.

The prohibition of retaliation referred to in the preceding paragraph shall not prevent the adoption of appropriate disciplinary measures if internal investigation shows that the report is false and that the user who made it was aware of its falsehood and, therefore, acted in bad faith.

**Confidentiality**. The Group will ensure the confidentiality of the whistleblower, and for that purpose, among other measures, the exercise of the right of access by the reported person will not involve access to the identity of the whistleblower. Therefore, and with the exception of cases expressly regulated, the reported person shall not know the identity of the whistleblower.

Moreover, (i) the persons who, because of the position they hold in the Audax Group, have knowledge of the reports made, as well as (ii) the GCO of the Group and the

Compliance Officers of the other subsidiary companies, or (iii) external advisers - are all expressly required to keep secret the identity of the whistleblower as well as any other information they may obtain through the System.

**Anonymity**. The System allows the reporting persons to make their reports anonymously or under their real name, so the reporting person may freely choose between anonymity and identification. Therefore, they have at their disposal a secure and encrypted communication mechanism through the Channel (secure mailbox) and, at all events, maximum confidentiality regarding identity must be guaranteed to the person making the report until any such time as they choose to identify themselves.

**Personal data protection**. The Internal Information System is designed in full compliance with diverse legal requirements concerning data protection in order to duly protect the privacy and secrecy of the persons concerned, and particularly in order to guarantee the confidentiality of the person making a report or enquiry.

## 6. Approval, publication and entry into force

This Policy has been approved by the Board of Directors of the parent company of the Audax Group on 27 September 2023 and entered into force at the same time. Likewise, it has also been updated on 17 December 2024.

The regulation of the Internal Information System, in particular this Policy and the Procedure, as well as the Whistleblowing Channel platform is published on the website, on the Employee Portal or similar tool of the Audax Group, and the regulation have been sent to the Staff as well as communicated, where applicable, to the Third Parties within the Group's business network. This Policy shall be reviewed, updated, approved and published periodically and whenever it may be necessary to introduce any amendments.