

## Impulse Channel

We all comply.

Here at Solunion, we are all Compliance

We have a firm Commitment to conducting all our activities and businesses in line with **strict regulatory compliance and ethical behaviour standards, both internally and externally.**

We regard Compliance as **the standard that protects the solvency, integrity and reputation of Solunion** and allows us to accomplish our strategic objectives and achieve sustainable, profitable and, above all, upright and ethical growth.

To guarantee the best management of compliance, we rely on the Audit and Compliance Committee, the Group Compliance Officer and the support and commitment of the different Compliance Officers of the Business Units.

**We are brave, because we exercise our responsibility with compliance**

As collaborators, **each of us is responsible for our own compliance**, as well as for **vigilance when detecting situations** and risks of non-compliance in our environment, whether deriving from the various legal regulations, our own Code of Ethics, as well as the rest of Solunion's regulations and policies, about which we must notify the company via the **Impulse Channel.**

**Magnanimity**, as Solunion's great ethical principle, is the attitude that drives us to undertake initiatives with a true spirit of service: promoting the good in people and in the whole of society, through ethical conduct.

This rectitude that drives us to want to be better every day is what should lead us, as collaborators, to use the **Impulse Channel and collaborate to ensure respect for our values:** being bold by nature, demonstrating our strength as a team and the real commitment that characterises us.

## Who can communicate?

Any person who has obtained information about infractions in a professional or work context, including, in any case:

- Employees and former employees of SOLUNION, directors, shareholders and managers.
- Volunteers, interns, workers undergoing training, and people whose employment relationship has not yet started (applicants).
- Clients, suppliers or collaborators

## What can I communicate to the Compliance Impulse Channel?

You can report any actions or omissions that may constitute any of the following infringements:

- Infringements of European Union Law.
- Serious or very serious criminal or administrative offences.
- Violation of human rights.
- Attitudes and behaviours that jeopardise the Commitments contained in SOLUNION's Code of Ethics and Conduct, as well as in its development policies and procedures.
- Actions or omissions that imply the breach of any of the legal obligations to which SOLUNION is bound.

For example, issues related with

1. Fraud, robbery or theft
2. Corruption, bribery, inappropriate gifts
3. Violation of competition rules
4. Compliance with any standard
5. Compliance with accounting, tax or financial regulations
6. Alteration of the financial or commercial earnings of the company

## How do I act in the event of a possible case of non-compliance?

Solunion has made available to you a platform via which you can exercise your **responsibility to ensure compliance** and **collaborate so that our company achieves more Compliance than ever**.

1.- **I detect** a case of non-compliance

2.- I access the Impulse Channel via the **Compliance Intranet or via the SOLUNION's own website**.

3.- I complete the **form** that appears at the portal, choosing the type of communication we wish to carry out.

4.- From that moment on, a **prudent, diligent investigation** process is commenced of the information communicated.

5.- Once the information has been sent, I will receive an **Acknowledgement of receipt** within the following seven (7) days.

6.- At all times, I can present my **allegations** as long as I have **reasonable grounds** to think that the information referred to is **truthful**. Whenever possible, I will provide documentary evidence of my allegations.

7.- Within three (3) months after the Acknowledgement of receipt, I will receive an **answer** about the processing of my communication.

8.- My information will be treated in a **confidential** manner at all times **and anonymously**, in the event that the informant so decides.

We regard the Impulse Channel from the outset in good faith and so its use does not entail any type of measure against the people who use it, even if the result of the investigation does not result in non-compliance.

On the other hand, the use of this Channel in bad faith, taken to mean its use to communicate information without reasonable grounds to believe that the information is true, or with the sole intention of damaging the reputation of Solunion, its collaborators or clients, mediators and stakeholders, could lead to the adoption of such measures as are relevant.

We understand our commitment to respect the regulations, our values, commitments and policies in a global manner which is why the Impulse Channel **is also available at our website** so that **clients, mediators and stakeholders** can report any possible cases of non-compliance and collaborate and help us ensure compliance at Solunion.

### **What will the investigation process and processing of the communication entail?**

Once the communication has been received, the admissibility study will be carried out and, where appropriate, the investigation procedure will be set in motion by the Compliance Function Officer who will verify whether there is any legal obligation to inform the official public bodies and authorities about the situation.

Once the investigation phase has concluded, the Integrity Committee will be convened, made up of the Compliance Function Officer, the CEO of the Solunion Group and the Corporate Director of People, Sustainability and Resources, who will maintain due confidentiality throughout the process.

This Committee will be responsible for assessing the procedure, the facts reported, the evidence and the allegations provided by both the informant and the person concerned and it will adopt the attendant solution.

It will not be communicated to third parties unless this proves necessary for the adoption of disciplinary measures or for the processing of any legal proceedings that may apply.

If the Integrity Committee decides that the investigation has to end, without any consequences and proceeding with its termination and shelving, the data will be destroyed immediately.

On the other hand, if the Integrity Committee decides to go ahead with the alert, the data will be kept with the utmost diligence and confidentiality.

In any case, the data of the person making the communication, of the person concerned and of any third party mentioned in the communication, as well as any actions that are carried out in the management and processing thereof, will be treated in such a way as to preserve their identity and confidentiality. They will be kept in the system only for such time as is necessary to decide whether to continue with the investigation.

In any case, once three (3) months have elapsed since the communication, Solunion will proceed with the deletion of the data, although they may continue to be processed in the event of judicial investigations or the imposition of disciplinary measures.

Any complaints which have not been admitted may only be recorded in an anonymised manner.

### **What if I just want to ask a question, present an idea or raise a concern? Go to our Legal & Compliance Contact**

Here at Solunion, we are advocates of collaboration. We firmly believe that we are all part of the same team. This is why, in terms of Compliance, we have created an informal space where we have open doors to listen, attend to and solve the concerns of our clients, mediators and our teams.

As collaborators, if you have any doubts about whether one of our commitments is being breached, or any internal rule or process is being infringed, contact us via the intranet mailbox on our Compliance page or by e-mail at [compliance@solunion.com](mailto:compliance@solunion.com)

We will consider your queries on a confidential basis and we will help you obtain information and advice to address and resolve any issues related with our Code of Ethics and our Commitments.

This mailbox is complementary to the rest of the channels you can go to.

For example, you can go to this channel if:

- You are not sure whether the conduct you observed or which you are aware of may be contrary to our Code of Ethics and Conduct, Commitments, Values, Standards and Policies.
- You wish to contact Compliance informally to advise you on any matter related with our Code of Ethics and Conduct.