

BCMGlobal WHISTLEBLOWER CHANNEL GENERAL POLICY

I. What can be communicated through the Whistleblower Channel?

The content of the communications must relate to:

- a. Actions or omissions that may constitute a serious or very serious criminal or administrative offence.
- b. Actions or omissions that may constitute a breach of BCMGlobal's Code of Ethics, where it may involve serious or very serious criminal or administrative liability.

II. Who can make a report?

Any individual who has obtained information about wrongdoing in an employment or professional context at BCMGlobal can report through the Whistleblower Channel.

III. How can a report be made?

The BCMGlobal Whistleblower Channel tool allows you to make a report in writing or verbally (by attaching an audio recording), both of which enjoy the guarantees of confidentiality or anonymity.

At the request of the informant, the communication may be made by means of a face-to-face meeting, which will be held within 7 days of the request.

IV. Who will be responsible for managing the communication?

Communications received through the BCMGlobal Whistleblowing Channel will be handled by the Head of the internal reporting system.

V. How will communications be handled?

Communications received through the BCMGlobal Whistleblowing Channel will be handled in accordance with Redwood's General Whistleblowing Channel Policy.

In any case, within 7 calendar days of sending the report, the informant will receive acknowledgement of receipt of the report, unless this would compromise the confidentiality of the report or if the informant has declined to maintain contact with the channel.

Within 3 months of receipt of the communication, extendable for an additional 3 months in cases of particular complexity, a response shall be given to the investigation proceedings.

After sending the communication, the BCMGlobal Whistleblowing Channel will guarantee bilateral communication of confidentiality, in the event that the complainant wishes to remain anonymous, no communications will be made, in order to complement, where appropriate, the information provided.

VI. BCMGlobal Whistleblower Channel Guiding Principles

The BCMGlobal Companies' Whistleblower Channel Management Procedures shall be governed by the principles described below.

- a. Confidentiality and Anonymity
 - The confidentiality of the content of communications and the identity of the communicators will be guaranteed, and anonymous communications will be permitted. BCMGlobal will ensure that only authorised personnel have access to the content and persons related to the communication.
 - The guarantee of confidentiality will subsist even if the communication is sent through channels other than those established (BCMGlobal's Internal Reporting System) or to BCMGlobal personnel other than those designated as responsible for the processing and management of the Whistleblowing Channel.
- b. Transparency: Monitoring and Recording of communications
 - Those responsible for the Whistleblowing Channel shall ensure transparency in the complete management of communications, ensuring traceability, monitoring and recording at all stages and procedures from receipt to conclusion.
- c. Personal Data Protection

- The processing of personal data on the grounds of communications received in the Whistleblowing Channel will comply with 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, as well as with the national regulations applicable in this area.
 - The party responsible for the processing of personal data is BCMGlobal Holding Iberia, S.L. The data will be processed for the purpose of managing the communications and/or complaints that are transmitted, based on compliance with legal obligations. The data collected will not be communicated to third parties, except to the competent judicial and public authorities, where applicable. The origin of the data will be the information provided by you and, if necessary for the processing of the investigation, personal data may be obtained through third parties. You may exercise your rights of access, rectification, deletion, limitation of processing, portability and opposition by sending an e-mail to dpo@BCMGlobal.es.
 - The communications and personal data contained therein will only be retained for the time strictly necessary and proportionate to comply with the Whistleblowing Channel regulations; more information on this can be found in the 'Information on the processing of personal data of the Whistleblowing Channel'.
- d. Protection of informants and affected persons
- Under no circumstances shall retaliation of any kind (including but not limited to job retention, professional role, salary, salary, training, sanction, intimidation or coercion) be permitted against callers.
 - The presumption of innocence, honour, the right to effective judicial protection, impartiality, the right to defence, to be heard and to have access to their file shall be guaranteed to the persons affected by the communication.

VII. External whistleblowing channels

Any person may report through the external Whistleblowing Channels set up by the Independent Whistleblower Protection Authority, the commission of any act or omission that complies with what is described in section three ('What can be reported through the Whistleblowing Channel').

Reporting to external Whistleblower Channels may be done directly or after reporting through the BCMGlobal Whistleblowing Channel.

Access information for this external channel will be posted on this portal as soon as it is known.