

ALERT CHANNEL POLICY



1. PURPOSE

Holaluz has an Ethical Code and some policies that establish the values and guidelines of behavior expected from its members and allies, and which is applicable to all its subsidiaries.

Compliance with current legislation and applicable internal regulations, transparency, and ethical behavior are fundamental principles that govern Holaluz and its subsidiaries' operations and are part of the backbone of its corporate culture.

To ensure that any behaviors that may violate these standards or the laws in force are detected, prevented, treated, and corrected, Holaluz has been equipped with an alert channel, which, in compliance with current regulations, guarantees the confidentiality of all communications and can be accessed through this [form](#), through which you can:

- File a complaint about possible breaches of legal regulations or any behavior contrary to the Holaluz Code of Ethics.
- Follow up securely and anonymously on the status of the complaint that has been filed (by means of the reference that will be indicated at the time of filing the complaint).

Additionally, there are alternative means of communication:

- E-mail: alertas@holaluz.com.
- Postal mail addressed to the attention of the Office of Compliance, Passeig Joan de Borbò, 99-101, 4 planta, 08039, Barcelona.
- Verbally, by telephone at 931220905.
- In-person, at the request of the complainant at alertas@holaluz.com, through a meeting within a maximum period of seven days from the request.

Complaints received by alternative means will be managed to ensure the secure treatment of the information.

We also inform that there are external information channels of the Independent Whistleblower Protection Authority.

The management of this channel is entrusted to the Compliance Officer and the resolution of the complaints processed through this channel is entrusted to the Compliance Committee.

This mechanism allows us to provide our Ethical Code with all its validity, solve incidents, as well as improve our regulatory and ethical compliance system, providing us with policies and procedures appropriate to the reality of our organization and sector.

Holaluz expects its members and allies to use actively and in good faith the channel alert for any situation or illegal or doubtful conduct that may result in sanctions, including criminal, for our organization as well as to formulate any questions or queries related to our normative and ethical compliance system.

This policy regulates the use of this alert channel that guarantees, in any case, the confidentiality of communications and the indemnity and protection of the whistleblower acting in good faith.

2. SCOPE OF APPLICATION

a. Objective

Any alert or report of irregular, illicit, or criminal acts carried out in breach of the Code of Ethics of Holaluz, its policies and procedures, and the laws in force.

Any questions about the Holaluz Code of Ethics, our own policies and procedures, and the regulations applicable to the activity of our Company.

b. Subjective

The policy applies to any individual or legal entity with a relationship with Holaluz and uses the alert channel to alert, including, but not limited to, its partners and managers, directors, employees, and dependent personnel, as well as collaborators, suppliers, subcontractors, and business partners.

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3. CONTENTS

3.1 Obligation of use of the alert channel

The members of Holaluz and its allies are called to use the alert channel, in good faith, as the only channel to convey all notifications about:

- 1) illicit or irregular behaviors detected in the operation and performance of the organization;
- 2) consultations on the regulatory compliance system of Holaluz, in particular, consultations on current legislation (Criminal Code or other applicable laws as well as the Code of Ethics and its own policies and procedures) regarding its content, scope, application and/or others; and,
- 3) queries regarding possible conflicts between the Code of Ethics and the laws observed in the activities, decision making, or actions developed for Holaluz.

Holaluz will treat all the notifications received through the alert channel with maximum **confidentiality**, preserving the rights of whistleblowers and denounced: in this sense, the use of the channel in good faith will never cause negative consequences for the complainant. The alert communicated by the channel provided herein is not and cannot be interpreted as an infringement of the principle of good faith in labor relations or as a breach of confidentiality or business secrecy. Any negative consequences suffered by the complainant as a result of his complaint must be communicated to the Compliance Officer or the Board of Directors and will be duly investigated and, if applicable, duly sanctioned.

3.2. Complaints

3.2.1. Notifications

Bona fide complaints sent through the aforementioned alert channels must include at least the following information:

- a. Detailed description of the facts that are the object of the notification and details of those denounced: in this sense, anonymous complaints will be investigated only if they sufficiently detail facts that are objectively susceptible of being considered illicit or irregular;
- b. Date or period of commission of the infraction or irregularity;
- c. List of witnesses or persons aware of the infraction or irregularity;
- d. Background or additional data relevant for research purposes.

Any documents that may be useful to verify the veracity of the facts reported may be attached.

3.2.2. Processing

The alert will be received by the Compliance Officer who will register it in the Complaints Registry and, later, analyze it.

In the event that the complaint is manifestly false or objectively lacks relevance, the Compliance Officer will close it, stating the reason that justifies this decision.

If it detects objective signs of infringement or irregularity, it will open the investigation, being able to carry out all the pertinent and necessary actions, within the budget approved by the Board of Directors, to clarify the details of the complaint.

If the initial data provided by the complainant were insufficient to open the investigation, the Compliance Officer may require you to complete them.

The deadline for the processing, investigation, and resolution of each alert may not exceed three (3) months, except in exceptional cases that must be motivated, duly and expressly, by the Compliance Officer.

In the event that the complaint is addressed to the Compliance Officer, the person in charge of processing it will be the CEO, who must follow the same procedure described in this Policy.

In both cases, the Compliance Officer will acknowledge receipt of the alert and inform the complainant of the course of processing that has been given.

3.2.3. Investigation

In its investigation, the Compliance Officer will avoid revealing the identity of the complainant unless it is essential or necessary for the investigation and provided that the defendant so authorizes.

In his task, he will have the support of all the areas and people of Holaluz: it is mandatory that the members of Holaluz attend the consultations and requests of the Compliance Officer with diligence, truthful and complete information. Failure to comply with this obligation will result in the disciplinary sanctions established in the applicable People policy.

The Compliance Officer may transmit his research requests, if deemed appropriate, through the CEO of the organization or the different Area Directors. The Compliance Officer will have access to all documentation, physical or electronic files, premises, offices and facilities of the company, without limitation. When in this investigation it is necessary to access computer equipment, servers or corporate emails, the access will be documented and carried out in strict compliance with the rules of use of said means and leaving a record of the purposes of access.

If necessary, the Compliance Officer may appoint internal or external investigators or create mixed investigation team. All of them will carry out their work in strict compliance with this policy, the Code of Ethics and its development regulations and, in any case, under the principles of integrity and confidentiality. Once the investigation is concluded, they will pass their results to the Compliance Officer.

In the investigation the rights of whistleblower and denounced will be taken into account and, in particular, their right to privacy, honor and defense: In this regard, within a maximum period of two (2) months from receipt of the complaint, the Compliance Officer will inform the defendant of the existence of the investigation that concerns him, allowing him to exercise his right of defense, among others, by accessing the file, providing the documentation and evidence that he deems pertinent and requesting the provision of documentation or the completion of relevant research measures. In case the complaint received turns out to be a false report, the defendant will have the right to be recorded in the Register of complaints.

Similarly, during the investigation and if the case so requires, the Compliance Officer may adopt or urge the CEO or Area managers to adopt the necessary measures to minimize the effects or damages that result or may result from the events reported and to preserve proof on them.

3.2.4. Resolution

Once the complaint has been investigated, the Compliance Officer will upload the result of the complaint and its resolution proposal to the Compliance Committee in the form of a report that includes (1) all the issues of the complaint, (2) the details of the investigations carried out, (3) the result of the investigation and (4) the resolution proposal. In case of doubts about the investigation or its results, the Board of Directors may request and order, either directly or through the Compliance Officer, the practicing of complementary actions.

The Board of Directors is responsible for adopting the decision on the resolution of each complaint, including the pertinent disciplinary measures (always in coordination with the Department of People) and the actions that derive from said resolution.

Likewise, said result will be communicated to the complainant and denounced, in a way that allows the reception of this communication to be accredited.

Once the investigation is completed, the file will be closed and only the files will be kept for the time necessary to comply with the procedures or actions that derive or are expected to derive from it (e.g. legal, judicial or administrative actions).

3.3. Queries

The queries will be sent to the Compliance Officer through the alert the alert channel [form](#), by email to alertas@holaluz.com or by post to the Holaluz office address: Paseo Joan de Borbó 99-101 4th floor 08039 Barcelona.

These channels are available in the local language in the countries in which Holaluz is present, and in the countries in which it maintains relationships with its suppliers.

The Compliance Officer will evacuate the queries received directly or through the external legal advisors of Holaluz specialized in the area or subject of the query.

When the consultations show deficiencies in the policies or procedures of Holaluz, it is the responsibility of the Compliance Officer to document them and propose the modifications, adjustments, revisions or elaboration of new norms or procedures that are necessary to improve the compliance system of the organization and to raise them to the Board of Directors for approval.

3.4. Personal Data

The personal data of all notifications and alerts received will be incorporated into the Complaints Register file and processed in strict compliance with current Data Protection regulations and the specific protocols and procedures approved by Holaluz.

4. CONSEQUENCES OF THE BREACH

The breach of this policy of Holaluz and its rules and development instructions will be sanctioned as a minor, serious or very serious infringement depending on the conduct and the damages that this generates to the Company or to third parties and in accordance with the provisions of the Agreement. Applicable collective.

It is also noted that the use in bad faith of the alert channel may be sanctioned.

The sanction will be imposed by the management committee, at the proposal of the head of the sanctioned person and/or the Compliance Officer, and prior to the hearing of the person investigated.

5. DOUBTS AND BREACH NOTIFICATIONS

Any doubt or notification of non-compliance with this policy must be notified to the Compliance Officer, as the person responsible for its supervision, updating and management.

6. INFORMATION / TRAINING

This policy is delivered to Holaluz members and third parties linked to the Company and will be accessible on the web of the Company.

Within its periodic training plan, which allows all Holaluz employees, members and stakeholders to have the necessary qualifications and knowledge in the various matters that affect them in the exercise of their professional activity, Holaluz has incorporated specific training related to the Code of Ethics. The training sessions will be prepared and announced by the Compliance Officer and attendance is mandatory for those invited to participate in each of them.

More specifically and only for the company's employees, Holaluz has mandatory training on all company policies (including this Code of Ethics) upon joining the Holaluz team.

7. DATE OF APPROVAL OF THE POLICY AND SUPERVISION, DEVELOPMENT, AND UPDATE APPOINTEES

This policy has been prepared by the Legal Area of Holaluz, which will be in charge of its supervision, development, and update.

This policy has been approved by the Board Members on March 14th, 2018, and updated on February 14th, 2022, June 1st, 2023 and November 30th, 2023.