



Ethical and Compliance Channel Management System Guideline



Purpose

To regulate the management and processing of communications received through the Ethics and Compliance Channel Management System¹ (hereinafter, "Channel Management System" or "System"), which includes the mechanisms for notifying and/or reporting irregular conduct.

This Guideline develops the Ethics and Compliance Channel Management System Policy (hereinafter, the "System Policy" or "Policy") regarding the application of the principles and guarantees to be followed in the management of information received through the Redeia Channel Management System.

Scope

Subjective Scope

All individuals who form part of Redeia (hereinafter, "Redeia people") must comply with this Guideline in the exercise of their functions and responsibilities, in all the professional areas in which they represent the organisation, and must report any breach of current legislation, the Redeia Code of Ethics and Conduct (hereinafter, "Code of Ethics") and the other internal Redeia regulations that articulate it.

Redeia also encourages its external stakeholders (hereinafter, "Third Parties") to also use the Channel Management System in the cases regulated in this Guideline.

Objective scope

Redeia and Third Parties must report irregular conduct, or justified suspicions thereof, that may involve a breach of current legislation, the Code of Ethics and other internal Redeia regulations that articulate it. Redeia's Ethics and Compliance Channel (hereinafter, "Ethics Channel") can also be used to raise doubts or enquiries thereon.

The following subjects can be reported through the Ethics Channel:

1. Breaches of the values and principles set out in the Code of Ethics and the internal regulations that articulate it, including breaches related to financial, accounting or commercial malpractice;
2. Acts or conduct that may have criminal implications;
3. Serious or very serious administrative breaches;
4. Breaches of labour law in the field of health and safety at work;
5. Breaches of European Union law falling within the material scope of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of European law and the Spanish transposing law.

The Ethics and Compliance Channel may also be used to communicate enquiries on the interpretation of the ethical values, principles and guidelines of conduct of the Code of Ethics and Conduct, and suggestions for improvement related to the Code of Ethics and Conduct.

¹ Reference is made to the Internal Information System under Law 2/2023 of 20 February, governing the protection of persons who report regulatory infringements and the fight against corruption.

Submitting a Complaint or Enquiry

Communication Channels

The following is a description of the communication channels for complaints and enquiries available to Redeia²:

Platform of the Ethics and Compliance Channel	<ul style="list-style-type: none"> • Online application available at group level (provided by a leading company in this field). • Accessible through the Redeia website and intranet (in a separate, easily accessible section). • Possibility of anonymous communications. • Measures to preserve the security and integrity of information and the proper processing of personal data.
Email address	Through the email address gestoretico@redeia.com .
By post	Redeia, Paseo Conde de los Gaitanes 177, 28109 Alcobendas (Madrid), FAO the Ethics Manager and Interest Group Ombudsman.
Face-to-face meeting	Any conduct may be reported verbally to the Ethics Manager by means of a face-to-face or online meeting to be held within seven (7) days of receipt of such a request through the Channel platform or by means of a written communication addressed to the Ethics Manager.

Redeia's other channels of communication are not channels intended for whistleblowing. In the event that any communication falling within the objective scope of the Ethics Channel Management System is received through such channels, the reporting person will be redirected to the Ethics and Compliance Channel. Without prejudice to the above, the confidentiality of complaints received through any of these channels will be guaranteed.

Similarly, the Redeia website provides clear and accessible information on external channels for reporting to the competent authorities.

Handling of Complaints

Requirements for a Complaint

The submission of a complaint must comply with the following formal requirements:

- a) Identity of the reporting person and email address, if the report is not anonymous.
- b) Identity of the reported person or organisational unit involved.
- c) The facts giving rise to the complaint, specifying as far as possible the breach of the Code of Ethics and Conduct or of the applicable regulations.
- d) Evidence or indicators to support the alleged fact, to the extent possible.
- e) Place and date of dispatch of the complaint.
- f) Acceptance of the Ethics and Compliance Channel Privacy Policy and the Redeia Channel System Policy.

It must also meet the following material requirements:

² Reports of moral, sexual and gender-based harassment can be sent through the Ethics and Compliance Channel or the email address for the Medical Service (serviciomedico@redeia.com) and will be processed under the procedure established in the "Action Guideline for the prevention of moral, sexual and gender-based harassment".

- g) Be made in good faith and be based on true facts, notwithstanding any inaccuracies or omissions that may be inadvertently made by the reporting person.
- h) Deal with events within the objective scope of the Channel Management System.
- i) Be submitted by Redeia or third parties.

Procedure for Handling Complaints

Maximum deadline: 3 months [+ 3 additional months in cases of particular complexity]



Reception, registration and analysis. Inadmissibility or admissibility of the complaint	Instruction	Conclusion	Implementation and monitoring
<p>Ethical Manager</p> <ol style="list-style-type: none"> 1. Acknowledgement of receipt and information on data protection. [max. 7 days deadline] 2. Decision on admission or inadmissibility of the complaint. [max. 10 days deadline]. 3. Notice to the informant and request for additional information. 4. Opening of the file and appointment of the Complaint Investigator. 	<p>Compliance¹</p> <ol style="list-style-type: none"> 1. Investigation of the complaint (under principles of confidentiality, objectivity, impartiality, independence and proportionality). 2. Preparation of a detailed report on the outcome of the investigation (internal investigation report). 	<p>Ethical Manager</p> <ol style="list-style-type: none"> 1. issue of the Report on the resolution of the case. 2. Communication of the Resolution Report to: <ul style="list-style-type: none"> • Informant; • Reported person; • Areas involved; • People and Culture Unit (adoption of disciplinary measures). 	<p>Areas of the organisation</p> <ol style="list-style-type: none"> 1. Implementation of actions arising from the Resolution Report. <p>Ethical Manager</p> <ol style="list-style-type: none"> 2. Monitoring of actions and safeguards taken. 3. Preparation of the annual report on the management of the Code, which is submitted to the Board.
<ul style="list-style-type: none"> • Right of anonymous reporting. • The Ethics Manager may act ex officio. • Referral of information to the Public Prosecutor's Office on criminal offences. • The Ethics Manager will delegate the processing and management in the following cases: <ul style="list-style-type: none"> ○ People and Culture Unit (employment-related non-compliance). ○ Criminal and Anti-Bribery Compliance Committee (criminal non-compliance). ○ Monitoring body for the prevention of moral, sexual and gender-based harassment (harassing behaviour). • Whistleblowers has the right to be heard during the processing of the case. 	<ul style="list-style-type: none"> • Due confidentiality of the informant will be ensured. • The presumption of innocence and the right to honour of the persons concerned will be guaranteed. • The person complained of has the right to be heard during the processing of the case. 	<p>The Resolution Report will include:</p> <ul style="list-style-type: none"> • Facts as reported. • Measures taken. • Outcome of the proceedings. • Arguments of the person complained of. • Assessment of the facts complained of (upholding or dismissal). • Measures to be taken for the protection of the informant. 	

Note 1: Compliance Director/Chief Compliance Officer and/or Compliance Officers appointed in the subsidiaries.

Protocol for the Protection of Whistleblowers Against Retaliation (Annex I)

Redeia has in place a Retaliation Protection Protocol with the objective of protecting whistleblowers who submit a report through Redeia's Ethics and Compliance Channel Management System from potential retaliation, including threats of retaliation and attempted retaliation. The Protocol aims to establish a framework of protection that can effectively address situations of risk and protect persons who report in good faith from such retaliation.

Handling of Enquiries

Requirements for an Enquiry

The submission of a communication should include the identity of the person making the enquiry and their email address, as well as the reason for the enquiry and any relevant attachments. The Redeia System Policy must be accepted prior to submission.

Procedure for Handling Enquiries

Any enquiries or suggestions for improvement related to the Code of Ethics and Conduct made through the Ethics Channel will be processed by the Ethics Manager with the collaboration of the Compliance Director and the Head of Redeia's Compliance Department, as well as with the collaboration of the Compliance Officers of the subsidiaries in their sphere of action.

Depending on the nature of the enquiry, the Ethics Manager may be assisted by internal bodies involved in the supervision of the legal duties and commitments assumed by the organisation.

Enquiries will be answered within ten (10) calendar days of receipt, which may be extended by a further ten (10) calendar days in cases of particular complexity.

Dissemination of the Ethics and Compliance Channel

Awareness raising and training are key factors in the development of Redeia's corporate culture based on integrity. The members of Redeia and its interest groups must be aware of the existence and operation of the Ethics and Compliance Channel, for which purpose it will be available on the Redeia website and intranet in a separate, easily accessible section.

Protection of Personal Data

Information regarding the processing of personal data derived from the use of Redeia's Ethics and Compliance Channel Management System can be found in the Ethics and Compliance Channel Privacy Policy.

This **Ethical and Compliance Channel Management System Guideline** was approved by the Board of Redeia's parent company on **30th May 2023**, the date of its entry into force.

Annex I. Protocol for Protection Against Retaliation

Retaliation	<p>An act or omission prohibited by law, or which involves unfavourable treatment that places the persons concerned at a particular disadvantage compared with another in the employment or professional context, solely because of their status as reporting persons, and provided that such acts or omissions occur during the investigation procedure or within two years of the termination of the investigation procedure.</p> <p>Examples: suspension of employment contract, dismissal or termination of the employment relationship, damages, economic losses, coercion, intimidation, harassment, ostracism, in particular.</p>
Conditions for Protection	<p>Persons falling within the subjective scope of Law 2/2023 will be covered by the protection regime provided for in the Protocol provided that the following conditions are met:</p> <ul style="list-style-type: none"> a) Reporting of breaches falling within the scope of the Law. b) Existence of reasonable grounds on the part of the reporting person to believe that the information reported is true at the time of reporting, even if no conclusive evidence could be provided. c) Communication of information in compliance with the requirements of the Law. <p>Subjects are expressly excluded from protection if they report:</p> <ul style="list-style-type: none"> a) Complaints inadmissible under the provisions of the Law; b) Information related to interpersonal conflicts, or affecting only the reporting person and the reported person; c) Information that is already fully available to the public or is mere hearsay; d) Information related to breaches not falling within the objective scope of subparagraph (a) of the previous paragraph.
Protective Measures	<ul style="list-style-type: none"> • Anonymity and confidentiality. • Development of training and communication actions. • Prohibition of retaliation against whistle blowers acting in good faith. • Regular monitoring of its implementation.

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Valuing the essentials