
Whistleblowing Channel Policy

Duro Felguera Group



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1. INTRODUCTION




The Duro Felguera Group, through its Regulatory Compliance Model, is committed to ensuring the correct application of legal regulations and those other obligations that it has voluntarily assumed through the development of its internal regulations. Through this premise, the Duro Felguera Group strengthens its firm commitment to ensure compliance with ethical principles and good corporate governance, fostering a solid culture of regulatory compliance in which the organization's ethical values are the central elements of its activity and decision-making.

Creating, maintaining and updating an efficient compliance culture entails establishing systems for reporting potential breaches. To this end, an Internal Reporting System called the Ethics Line has been developed in compliance with the applicable regulations and adopting the best market practices.

The management of the Duro Felguera Group's Internal Reporting System is based on the principles set out in this Policy and in the Internal Procedure for the Management of the Ethics Line. The means contained in both documents are the support for the protection of the whistleblower offered by the Duro Felguera Group when using its Internal Reporting System, creating a reporting model whose fundamental pillars are the confidentiality of the information processed and data protection, without prejudice to the rest of the principles governing the management of the Ethical Line.

2. PURPOSE OF THE POLICY

The purpose of the Whistleblowing Channel Policy (hereinafter referred to as the Internal Reporting System or Ethics Line) is to foster a culture of rejection of wrongdoing in the scope of the activities carried out within the Duro Felguera Group, encouraging employees to help detect them, guaranteeing the protection of the whistleblower without the whistleblower facing potential retaliation. It means that the users of the Ethics Line (whistleblowers) have a direct communication channel to report suspicions of irregular or inappropriate conduct. This Policy refers to any type of report or potential non-compliance regardless of its nature, although the person in charge of the Internal Reporting System will manage those relating to:

-  Corruption-oriented offences or any other offences considered in the Group's Crime Prevention Model.
-  Breaches of the Code of Conduct, especially those related to the principles contained therein.
-  Others that may constitute a criminal offence, especially those considered in Law 2/2023 on whistleblower protection: (i) breaches of EU law with an impact on matters such as the free movement of the internal market, tax fraud, free competition, the environment or data protection, as well as (ii) serious or very serious administrative offences.

Any other report received through the Ethics Line will be redirected by the person in charge of the Internal Reporting System to those responsible for managing it, especially reports related to the labor area will be directed to the People and Organization Department for processing.

3. SCOPE OF APPLICATION

This Policy is addressed to any employee, representative or third party related to the Duro Felguera Group who reports a potential breach and/or enquiry in relation to a possible non-compliance with the applicable legal or internal regulations at any time through the Ethics Line. Communications that are not directly managed by the Head of the Internal Reporting System, as described in the section on the purpose of the policy, do not fall within its scope of application.


It is complemented by the Internal Standard for reporting enquiries, complaints and internal investigations (NIG 15), both documents being published on the corporate intranet and on the Group's website, as well as on the website of the Ethics Line.


4. RESPONSIBILITIES

The Duro Felguera Group defines the following responsibilities concerning the Internal Reporting System or Ethics Line:

- df Board of Directors:** The main body responsible for the implementation and maintenance of the Internal Reporting System (Ethics Line) and the ethical culture in the Group. It is also responsible for the approval, at the proposal of the Audit, Risk and Compliance Committee, of the policy defining the principles for managing the Ethics Line and its associated procedure, as well as the appointment and dismissal of the person responsible for the Internal Reporting System.
- df Audit, Risk and Compliance Committee:** A follow-up and control body to establish and monitor a mechanism that allows employees, representatives and other stakeholders to report criminal offences or unethical conduct of potential importance confidentially and anonymously. It will propose to the Board of Directors the approval of the regulations associated with the management of the Internal Reporting System and the appointment and dismissal of the person responsible for it.
- df Internal Audit and Regulatory Compliance Department:** Responsible for implementing and managing this mechanism for reporting potential irregularities and ensuring that the processing of the reports received is carried out diligently, confidentially and, where appropriate, anonymously when requested by the whistleblower. Responsible for the Internal Reporting System or Ethics Line.
- df Compliance Committee:** Responsible for monitoring the management of the Internal Reporting System or Ethics Line, and therefore for:
 - Providing an assessment on important reports from the Head of the Reporting System that could significantly affect the Group's strategy.
 - Requesting the initiation of an investigation or the admission or reopening of a report submitted through the Ethics Line that has been archived, when it considers that there are indications or irregularities that should be investigated.
 - Handling reports or ex officio enquiries involving the Head of the Internal Reporting System.

- In accordance with the Final Report issued by the investigating body concerning the investigation, it shall: (i) in the case of non-criminal acts, propose the resolution of the report to the competent body and inform the Board of Directors of Duro Felguera, either directly or through the Audit, Risk and Compliance Committee and, (ii) in the case of criminal acts, send the Final Report to the Board of Directors of Duro Felguera, which shall take the decision to be adopted and the measures to be implemented, including disciplinary measures and, the possible reporting to the competent judicial authorities.

 **Management Committee:** The members of the Management Committee, individually and collectively, are responsible for implementing, ensuring and disseminating through their practice the highest ethical standards and compliance with implemented internal policies, encouraging the use of the Ethics Line among employees.

 **Employees and Representatives:** They are responsible for applying the Group's ethical principles and values. They are obliged to report any potential irregularities detected, whether criminal, regulatory or ethical, including possible actions contrary to the principles defined in the Group's Code of Conduct.

5. POLICY BASIC PRINCIPLES

Reporting

All Employees and Representatives of the Duro Felguera Group have not only the possibility but also the obligation to report any potential risk or complaint in the Group that involves a breach of the Regulatory Compliance Policy and the regulations that develop it, especially the Code of Conduct, as well as any conduct that could constitute a crime, using the Internal Reporting System (Ethics Line) for this purpose.

The obligation to report such situations must be fulfilled in accordance with the principle of good faith and without fear of disciplinary action or retaliation.

Truthfulness

The enquiries and complaints submitted must always and, in all cases, meet objective criteria of truthfulness, responsibility, proportionality and good faith. This implies that the whistleblower acts on reasonable grounds that the information he or she is reporting is accurate.

Presumption of innocence

The investigated party shall be presumed innocent at all stages of the proceedings and shall have the right to remain silent, in whole or in part, to refute incriminating evidence and to use any means of defense.



Anonymity

The Duro Felguera Group allows the reporting of breaches anonymously, especially in those cases in which it is necessary to safeguard the identity of the whistleblower to preserve the proper purpose of the report and its subsequent investigation, thus complying with the provisions of the applicable national and EU regulations.

However, whistleblowers are encouraged to identify themselves by providing their contact details so that they can be contacted during the complaint processing if necessary. In this case, the Duro Felguera Group guarantees the confidentiality of their identity and all related information.

Confidentiality

The Duro Felguera Group guarantees the absolute confidentiality of whistleblowers and other parties involved during the procedure and any dealings with processing the report itself. The identity of the whistleblower shall be known only to the person responsible for the Internal Reporting System and to such third parties as may be strictly necessary, depending on the specific circumstances of each case, especially at the time of adopting disciplinary measures or for the processing of any legal proceedings that may proceed, as appropriate.

All of them shall be bound by the strictest duty of confidentiality.

Non-retaliation

The Duro Felguera Group expressly prohibits adopting any type of retaliation, threats, coercion, penalties, forms of discrimination or negative measures adopted to the detriment of the whistleblower because of the breach reported, thus assuming the good faith of the same. The Duro Felguera Group understands retaliation as any treatment that places the whistleblower at a disadvantage before another employee or third party in a professional context.

As a guarantee of this principle, any Employee or Representative who considers that he or she is being or has been subjected to any form of retaliation, directly or indirectly, must report it to the People and Organization Department and, should it persist, to the Internal Audit and Compliance Department.

Effective guardianship

Any potential breaches reported through the Ethics Line and any data, information or related document provided are guaranteed to be fully analyzed and resolved.

Proportionality

The collection and gathering of data and information during the complaint reporting procedure shall be limited to what is strictly and objectively necessary for its proper processing and to verify the reality of the reported facts.

Fairness

Enquiries and complaints will always be handled in a fair, complete, objective, independent and honest manner.



Hearing

Unless any of the circumstances provided for in this procedure limit and/or exclude the principle of a hearing, the whistleblower and the investigated party must be heard during the processing of the case.

Equal opportunities

The whistleblower and the investigated party shall have the same possibilities for an effective and balanced hearing to submit their position and version of the facts, avoiding unfair privilege situations.

Defence

The investigated party may request and/or provide at any time during the reporting procedure such information, documentation, or evidence as he/she deems appropriate, provided that it is reasonably connected or related to the subject matter of the investigation.

Presumption of good faith

The whistleblower who reports a potential breach through the Internal Reporting System (Ethics Line) is responsible for the truthfulness and accuracy of the data provided. The Duro Felguera Group reserves the right to adopt disciplinary measures and/or sanctions in accordance with the regulations in force for those whistleblowers who, thus contrary to good faith, have reported potential breaches knowing them to be false or with reckless disregard for the truth.

Principle of evidence

To report a potential breach, the whistleblower shall provide or point to the minimum prima facie evidence to support the report. Any evidentiary material permitted by law and obtained in a lawful manner, with respect for the law and constitutional rights and principles, preferably in documentary form, shall be considered valid evidence, although testimonial evidence shall also be admissible, including the testimony of the whistleblower him/herself.

Data Protection Rights of the Ethics Line

In accordance with the requirements of Spanish personal data protection regulations, all users of the Ethical Line will have the right to access and, if necessary, request the rectification of their personal data through the Ethical Line website.

Likewise, the Duro Felguera Group has implemented the corresponding security measures necessary to guarantee the security of personal data and to avoid its alteration, loss, processing or unauthorized access.



6. PUBLICATION AND ENTRY INTO FORCE

The Whistleblowing Channel Policy was approved by the Board of Directors of Duro Felguera on 12th of June 2023. This Policy may be updated and revised periodically at the proposal of the Internal Audit and Compliance Department and/or the Compliance Committee.

The Whistleblowing Channel Policy will be published both on the intranet and on the corporate website, together with the Internal Enquiries, Complaints, and Investigations Reporting Standard (NIG 15), as both documents should be read jointly.