

**REGULATION**

**OF THE ETHICS AND COMPLIANCE**  
**CHANNEL**

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## 1. **Purpose of the Regulation**

The purpose of this Regulation of the Ethics and Compliance Channel (the “**Regulation**”) is to establish in the **GMV Group** (“GMV”) the processing of any claim of possible situations of noncompliance with the applicable legislation and the Code of Ethics.

The investigation and clarification of the events detected or reported must be processed in accordance with this Regulation, in accordance with the guarantees offered by the current regulations for the Bound Parties, in particular when the rights of privacy, dignity and personal data protection of the Bound Party could be compromised.

In this sense, the development of the internal investigations must guarantee the right to defense, the presumption of innocence and the right to privacy of the Bound Party investigated, as well as the claimant, in the terms legally set forth. In this sense, the measures used during the investigation must comply with the following requirements:

- (a) Judgement of suitability: subject to achieving the objective proposed through the measure.
- (b) Judgement of need: the measure is necessary in the sense that there is no other more modern measure to achieve the goal with the same efficiency.
- (c) Judgement of proportionality: if it is weighted or balanced due to offering more benefits or advantages for the general interest than damage to other assets or values in conflict.

This Regulation will be duly updated when the applicable rules so require, or when GMV deems it necessary due to a specific need.

## **Scope of Application**

This Regulation applies to Bound Parties who are the members of the GMV management bodies and to all GMV employees.

## **2. Principles**

Reporting and being immediately aware of any possible irregularity is essential to guaranteeing integrity, reputation and business continuity.

All claims must be made in good faith, understood as always providing true and accurate information, even after verifying that it was wrong. In cases in which the claimant has made a claim in bad faith, GMV will take appropriate measures in accordance with this Regulation and the applicable legal regulation.

The authority to investigate and, when necessary, punish any infractions of the Regulatory Compliance System is held by the GMV Ethics supervisor for matters related to criminal offences (including any failure to comply with controls established in the Noncompliance System itself) and the Human Resources Department for the rest of the infractions.

As a general principle, although the system requires identifying the claimant to respond appropriately, GMV guarantees that the identity of the claimant will be handled confidentially and is committed to protecting the rights of the people making claims in good faith, adopting the measures legally allowed to protect privacy in the investigation and all other rights of those involved.

GMV does not tolerate any type of reprisal against those who make any claim in good faith regarding possible noncompliance with the Code of Ethics, as well as external and internal regulations.

### **3. Receipt and preliminary analysis of the Incidents**

#### **3.1 Acknowledgement of Receipt**

The GMV Ethics supervisor is responsible for managing the Ethics and Compliance Channel, controlling the claims submitted to identify noncompliance.

Following the receipt of any claim and Incident report through any of the available channels, the GMV Ethics supervisor will acknowledge receipt within a period of three (3) working days.

The GMV Ethics supervisor will inform the claimant of the collection and processing of their personal data, which will be processed confidentially in accordance with the current legislation.

#### **3.2. Information for the claimant on processing of the case**

The GMV Ethics supervisor will inform the reporter or claimant of the non-admission of the claim, filing of the case or deviation to another body, as applicable, as well as any additional measure that may be adopted, or of the processing of the claim, if there are objective reasons to do so.

### **4. Confidentiality of the Proceedings**

The GMV Ethics supervisor and any intervening party in the investigation proceedings is required to:

- (d) keep the Confidential Information related to the proceedings and the events and conduct subject to communication or the claim presented in the strictest secrecy. Any party who, for any reason, participates in the proceeding must likewise comply with this confidentiality obligation; and
- (e) not reveal, directly or indirectly, the Confidential Information (or allow it to be revealed), in whole or in part, to a third party.