




INTEGRITY LINE

ZAMORA COMPANY

28 April 2022

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INTRODUCTION

Any employees or collaborators of Zamora Company who have indications or suspicions of the commission of any crime or of the breach of any of the principles and values expressed in the Code of Ethics and Conduct and its implementing documents must report the infraction via the Integrity Line established by the Group.

SCOPE OF APPLICATION

The present document will apply to all the employees and collaborators of the companies of the Zamora Company Group.

OBJECT

This system is established to channel possible illegal acts, without risk for the person reporting and with guarantees for the person reported, within the scope of compliance with the Company's rules of conduct.

This document determines the guidelines of the Integrity Line, in accordance with the provisions of the Code of Ethics and Conduct, policies, manuals and procedures laid down in consequence of and in accordance with the attributions granted by the Board of Directors of the Zamora Company and which derive from the operative regulations of the Compliance Committee.

This Policy establishes the following specific requirements:

1. Submission of reports via the Integrity Line platform and also in person if the person reporting so prefers;
2. Acknowledgement of receipt of the report within a maximum of 7 days;
3. *Ad hoc* designation by the Compliance Committee of an Investigation Team to operate until the termination of the case, and the designation of a Case Manager, who will be the person responsible for processing the reports and who will maintain communication with the person reporting and, if necessary, will take charge of requesting additional information from them and replying to them;
4. Diligent processing of all the reports (including anonymous reports);

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5. Establishment of a general period of 3 months to reply to the person reporting on the processing of the report, counted from the acknowledgement of receipt.

The purpose of this Policy, which implements the obligation of the use of the Zamora Company's Integrity Line and the form of using it, is to provide advice and certainty in the decision-making process of a person who becomes aware of possible violations of the applicable regulations, of the Code of Ethics and Conduct and/or of any policy, manual and procedure laid down in consequence.

DISSEMINATION

The Integrity Line will be disseminated among all the employees and persons related with the Zamora Company. The information on its existence will be formally communicated to all of the Group's employees at the moment of its approval or of the incorporation of the employee into the Company, if later.

In addition, it will be published on the notice-boards in the physical spaces, will be available in the intranet of the Zamora Company, and internal communications will be made by electronic means.

The collaborators with whom the Zamora Company works will have an annex in the contracts containing the information relating to the Integrity Line and it will be published in the Company's website (www.zamoracompany.com) for consultation.

GUIDING PRINCIPLES

1.1. Confidentiality

The Zamora Company assures the **total confidentiality** of the reports, the persons reporting and persons reported, along with compliance with the current data regulations, except in the event that the reported conducts have to be notified to the pertinent authorities.

The person reporting is subject to the duty of confidentiality and may not divulge the facts to third persons, except in the event of an illegal act reported to the competent authorities, and even so this will be done in the most discreet manner possible in order not to harm the image of the persons and the Company.

1.2. Objectivity

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The Zamora Company guarantees **exhaustive, complete and objective analysis of the fact** and circumstances which have been communicated by way of the Integrity Line, preventing any type of arbitrariness in the actions. The decision on each and every one of the communications received will always be duly motivated.

1.3. Anti-reprisal policy

The Zamora Company guarantees that the person reporting will not be subjected to any type of reprisal for submitting the report, unless bad faith is detected, in which case the provisions of the Group's disciplinary system will apply.

1.4. Hearing of the parties

Once a report has been admitted, it will be indispensable to guarantee a hearing for the interested parties (person reporting and person reported) in order for them to declare whatever they consider pertinent to clarify the facts.

2. COMPLIANCE COMMITTEE

The Compliance Committee is the body in charge of examining all the reports submitted by any person with a legitimate interest, and its competences will include their reception, examination and, as the case may be, referral, along with the decision on each case.

3. PROCEDURE

3.1. Submission of the report

If any person suspects a non-compliance with the rules of the Code of Ethics and Conduct and its related policies and procedures, they must report it by way of:

- The Integrity Line platform: by completing the electronic report form available in the platform, which can be accessed by the following alternative means:
 - In the link included in the Company's website;
 - In the direct link to the platform:

<https://zamoracompany.integrityline.com/frontpage>

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- In addition, and since non-compliances will be incorporated into the platform which can be accessed by all the members of the Compliance Committee, non-compliances may be reported in person to any of these members, who will incorporate the case into the platform for it to be processed by the full Committee, which will handle the case in the most appropriate manner to avoid conflicts of interest.

The members of the Compliance Committee are the Managers of the following areas:

- Corporate Services
- Human Resources
- Legal Consultancy


- Finally, and in exceptional circumstances, non-compliances can be reported to the hierarchical superior, who will assess the best way of managing it and incorporating the case into the platform to be handled by the Compliance Committee.

If anyone wishes to report a non-compliance, they can choose to do so under their own identity or, if they prefer, anonymously. The Zamora Company will not take any form of direct or indirect reprisal against any professionals who have submitted a report in good faith.

However, the Zamora Company prefers that, in the case of presenting a report, the person reporting identify themselves by providing their name, function and contact data. In this way, the personnel in charge of processing the report will be able to contact the person reporting in order to carry out a follow-up of the case if necessary.

The information to be reported must be as complete and truthful as possible, and therefore the person reporting must provide in detail all the information they are aware of in relation with the possible infractions, including any proof or document which will permit handling the case in the fastest and most effective manner possible.

The confidentiality of the reports received will be guaranteed at all times, and communications made anonymously will also be accepted. If the report is not anonymous, the identity of the person reporting may not be communicated to the person reported under any circumstances.

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It will be fundamental for the person reporting to provide a minimum of indications on the alleged fact or facts in order to permit an analysis of the information received and discard the possibility of a false report.

Once submitted, the report will be registered in the Integrity Line.

3.2. Processing of the report

Once the report has been registered, it will be investigated in the following stages:

3.2.1. Admission

The receiver of the report, that is, the Compliance Committee, will assess its veracity and acknowledge its receipt within a maximum of 7 days from its reception.

The decision on admission will be communicated to the person reporting, and if the report is admitted, the investigation of the alleged non-compliance will commence.

3.2.2. Examination

Once the report is admitted, the Compliance Committee will form an Investigation Team to examine it, carrying out all the necessary actions which may be required to clarify the facts, in addition to holding interviews with the persons involved, requests for information or documentation from other departments of the organisation, analyses of data, obtainment of information from external sources, etc., thus compiling the necessary evidence.

It will be indispensable to interview the person reporting and the person reported, formalising the contents of the interviews in a document recording the questions asked concerning the facts reported, except in the case of an admitted anonymous report, in which case this step must be excluded in regard to the person reporting.

The examination must be carried out in the shortest possible time, and in all cases within three months from the admission of the report.

Once the examination has been concluded, the examining party will issue an **impartial motivated report** containing its **proposed decision**, which may consist in:

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- Proposal to shelve the file, for any of the following reasons:
 - a) Due to non-existence of rational indications of the commission of the violation. However, even if the reported fact does not constitute a breach of the Compliance rules, the examiner may transfer the report to the pertinent department, such as Human Resources, Administration and Finance or any which may correspond.
 - b) Due to the reported breach having elapsed.

- Proposal of penalty, according to the seriousness of the investigated facts which must contain the following points:
 - a) Proof of the commission of the action.
 - b) Necessity or otherwise of bringing the action to the knowledge of the Public Authorities.
 - c) Proposal of the disciplinary penalty.
 - d) Corrective measures, if applicable.

In either of the two cases, the examiner's report must not contain their opinion, but must limit itself to setting out the facts of which they have become aware during the investigation and which are supported by proof. In addition, the reports must be drafted in a clear, concise and objective manner, without ambiguities or margin for speculation.

Once the report has been issued, it will be forwarded to the Compliance Committee for its decision.

3.2.3. Decision

The Compliance Committee will analyse the examination report and take the pertinent decision or, if necessary, forward it to the Governing Body for its decision.

4. INFORMATION TO INTERESTED PARTIES

4.1. Duty of information to the person reporting

In the event of submission of a report, the person reporting will be provided with the following information:

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- Registration number of the report.
- Corporate name and address of the party responsible for the file which conducts the processing.
- Purpose of the processing of the data.
- Information on the guarantees which, for the person reporting, govern the reporting process and are included in this protocol.
- Information on the method of exercising the POLIARSO rights (Portability, Opposition, Treatment Limitation, Information, Access, Rectification, Erasure/right to be forgotten and Opposition to processing for certain purposes).

4.2. Duty of information to the person reported and third parties involved


Once the evidence has been examined, the Compliance Committee must inform both the person reported and any third parties involved which it considers appropriate.

This duty of information does not entail revealing the identity of the person reporting or any data which may permit deducing their identity, but only the following information:

- That the person has been reported via the Integrity Line.
- Registration number of the report.
- The facts reported.
- Corporate name and address of the party responsible for the file which conducts the processing.
- Purpose of the processing of the data.
- Information on the guarantees which, for the person reported, govern the reporting process and are included in this protocol.
- Information on the method of exercising the POLIARSO rights (Portability, Opposition, Treatment Limitation, Information, Access, Rectification, Erasure/right to be forgotten and Opposition to processing for certain purposes).

5. PROCESSING OF THE DATA

The information contained in the report form will be strictly confidential and will only be processed by the **authorised personnel** for the purpose of managing the report. It will be filed correctly and access to it will be restricted exclusively to the

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authorised personnel in each corresponding case (Compliance Committee and designated Investigation Team).

The compiled data will be conserved in the report system only for the indispensable time for deciding on the appropriateness of initiating an investigation on the facts reported.

If three months have passed with no investigation having been commenced, the data must be eliminated from the report system in all cases, but they may be conserved in a different environment.

6. PENALTIES FOR NON-COMPLIANCE

In the event that the investigation conducted reveals the commission of one or more of the violations provided for in the Zamora Company's Disciplinary System, the corresponding penalty, also provided for in the System, will be imposed on the violator, without prejudice to any criminal liabilities or those of any other nature which may correspond according to the opinion of judges, courts and other competent bodies.

7. UPDATING OF THE INTEGRITY LINE

The Zamora Company reserves the right to modify this document whenever necessary. It will be disseminated via the channels established by the Group. Any modifications will be duly announced.