

Policy of the Consorci de la Zona Franca de Barcelona Internal Information System

The Consorci de la Zona Franca de Barcelona and Consorci ZF Internacional S.A.U. (hereinafter jointly, the "ConSORCI") are entities for the economic promotion and organisation of trade fair events, which are fully committed to their territorial, social and environmental surroundings and which develop strategic planning and business operations in accordance with compliance with the strictest legality, high standards of compliance and absolute commitment to practices that respect ethics and transparency. To this end, the collaboration of employees and third parties related to The Consorci who report regulatory violations or malpractice is essential.

For all of the above reasons, the Consorci has an internal information system (hereinafter, "the System") that scrupulously complies with the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

The purpose of this Internal Reporting System Policy (hereinafter the "Policy") is to set out the general principles governing the protection of persons who, in a work or professional context, detect regulatory breaches or malpractice and report them through the mechanisms established for this purpose.

Scope of application and general principles

The Policy forms part of the internal information system of the Consorci, as well as of all its subsidiaries and affiliates.

The Consorci's internal information system is made up of the following mailboxes or communication channels:

- Money Laundering Prevention Busts
- Confidential Information Security Channel
- Internal information channel

The System may be used by all interested parties who, within the subjective scope of each communication channel, wish to report non-compliances that are within its objective scope.

The Consorci advocates the following as general principles of the System:

1. **Confidentiality:** it is guaranteed that the informant's personal information and identity will be protected from disclosure without his or her consent.
2. **Anonymity:** the informant may opt for anonymity so that his or her personal data are not recorded in the System.

3. **Whistleblower protection and prohibition of retaliation:** any form of retaliation against a person who, in good faith, submits a communication is prohibited.
4. **Protection of the reported person:** the right to be presumed innocent, the right to defence, the right to honour and the right to be heard at any stage of the procedure for the investigation of a communication are guaranteed.
5. **Efficiency:** with the integration of the Consorci's different information channels or mailboxes into a single system.

The System Manager

The System Manager (hereinafter, the "Manager") is the person in charge of managing the system and processing the information received in the internal information channel. He/she is appointed, removed or dismissed by the governing body of the Consorci and both the appointment and the dismissal of the Manager shall be notified to the Independent Authority for the Protection of the Informant or competent bodies of the autonomous community.

The person in charge shall carry out his/her duties independently and autonomously from the other bodies of the Consorci and may not receive instructions of any kind in the performance of his/her duties. Furthermore, it must have all the personal and material resources necessary to carry out its functions.

Rights of informants and affected persons

Acts constituting retaliation, including threats of retaliation and attempts to retaliate against persons submitting a communication, are expressly prohibited and shall be prohibited:

- Have reasonable grounds to believe that the information referred to is true, even if they do not provide conclusive evidence.
- The communication is made in accordance with the requirements of Law 2/2023 and the procedures governing each Communication Channel or Mailbox.

The protection shall extend to natural persons related to the informant (such as co-workers or family members) and to legal persons with whom he/she has a relationship or a significant shareholding.

Likewise, the whistleblower protection measures provided for in Title VII of Law 2/2023 shall extend to the legal representatives of the employees in the exercise of their functions of advising and supporting the whistleblower.

The protection referred to above shall not be granted in the case of information relating to interpersonal conflicts or information that has been rejected by an internal information

channel or mailbox. The same shall not apply to information which constitutes mere rumours or which is available to the public.

By way of example, retaliation takes the form of:

- Suspension of employment contract, dismissal or termination of employment, or non-renewal, imposition of disciplinary measure, demotion or denial of promotion, substantial modification of working conditions; unless it is in the regular exercise of managerial authority under labour law.
- Damages, including reputational damage, financial loss, coercion, intimidation, harassment or ostracism.
- Negative evaluation or references in respect of work or professional work.
- Blacklisting or dissemination of information in an industry that hinders access to employment or recruitment.
- Denial or revocation of leave or licence.
- Denial of training.
- Discrimination, unfavourable or unfair treatment.

For their part, the persons affected by the communication shall have the right to the presumption of innocence, the right to honour, the right to defence and access to the file. They shall also enjoy the same protection established for informants, preserving their identity, and guaranteeing the confidentiality of the facts and data of the procedure.

Both the informants and the persons concerned may seek advice and assistance from the legal representative of the employees.

Information, dissemination and advertising

In accordance with the provisions of Law 2/2023, the Consorci has published on its website, in a separate and easily identifiable section, direct access to the internal information channel and to the other communication mailboxes.

This Policy shall be published on the Consorci's website and made available to its members via the Intranet, together with the Procedure for processing communications.

Approval, entry into force and review

This Policy has been approved by the competent body and shall enter into force at the time of its publication on the website. Subsequent revisions and updates shall be carried out by the System Manager and shall be approved by the General Secretariat of the Consorci de la Zona Franca de Barcelona.