

# Ethical Channel Management Procedure



## DOCUMENT PROPERTIES

<b>Document title:</b>	Ethical Channel Management Procedure		
<b>Summary:</b>	This document includes the guarantees, guidelines and measures that must be followed for the management of queries and complaints received in the Ethical Channel		
<b>Applicable to:</b>	All professionals from Spain, India, Mexico and Hungary		
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## VERSION HISTORY

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1.0	Compliance Committee	Original version

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## 1. INTRODUCTION

### 1.1. Purpose

This document constitutes the Management Procedure of the Ethical Channel (hereinafter, "the Procedure") of the Group that make up the companies Uquifa Sciences S.L.U. (as the parent company), Unión Químico Farmacéutica S.A.U., Soneas Chemicals LTD, Uquifa México S.A. de C.V. and Uquifa India Private Ltd (as dependent companies), (hereinafter, "UQUIFA Group" or "Group").

This Procedure aims to comply with the mandate established in article 31 bis of the Spanish Criminal Code, as well as to regulate the operation of the Ethical Channel.

The UQUIFA Group makes available to its team a confidential tool, the Ethics Channel, to manage the communication of breaches, real or potential, of the Code of Ethics and Conduct, of any other internal regulations or of the applicable legislation, as well as to allow the realization of consultations and communications of suspicions or violations in terms of ethics or crime prevention that could be susceptible to clarification or improvement.

Likewise, complaints of harassment will follow the provisions of this Procedure, complying with current internal regulations.

### 1.2. Scope of the Ethical Channel

The recipients of the Procedure (hereinafter, "collaborators") are:



- The members of the Board of Directors of each company of the UQUIFA Group.
- The members of the Management Committee.
- The members of the Compliance Committee.
- The directors of the different companies.
- All the staff of the UQUIFA Group, regardless of the business area in question, their geographical location or the activities they carry out. Likewise, those labor personnel hired under any regime and contractual modality and collaborators with commercial link.
- Customers and suppliers.
- Stakeholders.

All collaborators will have access to the Ethical Channel, thus being able to any member of the UQUIFA Group make use of this means of communication in a mandatory way in the situations foreseen for its use.

### 1.3. Responsible for the Ethical Channel

The management of the Ethical Channel corresponds to the *Ethics, Compliance & Integrity Officer* (hereinafter, *ECI Officer*) or *Local Compliance delegate*, who assumes the task of receiving, verifying, and treating queries or complaints received by the means enabled for it with strict discretion and confidentiality, always acting with total independence and full respect for the affected persons.

In cases of special complexity or when the facts reported affect or may affect several departments, the *ECI Officer* or *Local Compliance delegate* may appoint an Instructor Committee of the Ethical Channel to collaborate in the investigation process. In this case, the members of the Committee must expressly assume the obligations of confidentiality and secrecy assumed by the *ECI Officer* and *Local Compliance delegate*.

## 2. PROCEDURAL GUARANTEES

In order to make effective use of the Ethical Channel, the different agents of the UQUIFA Group involved in the investigation process must ensure a series of guarantees that allow protecting both the user of the Channel and any possible person denounced.



### 2.1. Rights and guarantees of the whistleblower

- **Confidentiality**

The *ECI Officer* or *Local Compliance delegate* in charge of the reception and management of complaints and queries, guarantees the confidentiality of the communication and the processing of the procedure. In this way, the complaints or inquiries received will be considered confidential information.

This guarantees that, in any communication made in good faith, the identity of the complainant will not be revealed. Notwithstanding the foregoing, it is clarified that such identity may be provided to the administrative or judicial authorities in case it is expressly required as a result of any judicial or administrative procedure related to the object of the communication.

Likewise, the identity of the complainant may be known to the persons essential to carry out the relevant investigation. The person in charge of the investigation shall in any case avoid, during the processing of the investigation, the identification, both direct and by reference, of the complainant.

At the end of the investigation process, if it is concluded in favor of facts and / or actions worthy of a disciplinary sanction, the identification of such facts and persons may be

necessary in accordance with the applicable regulations to guarantee the right of knowledge and defense of the sanctioned employee.

- **Anonymity**

The complainant has, in any case, the possibility of making communications anonymously without the need to provide any kind of data that can identify him/her. Consequently, the anonymous whistleblower may use, for example, a generic email – not nominative, created exclusively for this purpose – or any other means that allows the concealment of his identity.

- **Indemnity**

The collaborator is guaranteed that he/she will not suffer reprisals, direct or indirect, as a result of making a communication in good faith.

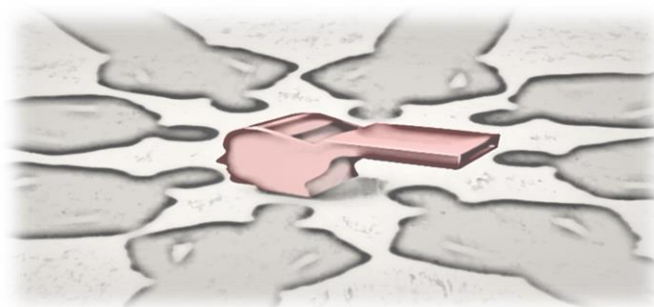
The indemnity of the complainant collaborator is guaranteed, so any member of the UQUIFA Group who denounces in good faith, may not be dismissed, disciplined, or suffer any other damage or retaliation in their employment relationship for this reason. A bona fide complaint shall be considered to be one made on the basis of facts or indications that have a reasonable appearance of constituting irregular, illicit or criminal conduct and from which no spirit of revenge or unjust harm can be derived from the denounced collaborator.

Any false or contrary to good faith report in accordance with the foregoing may lead to disciplinary sanctions for the complainant collaborator in bad faith. It will be understood that a complainant does not act in good faith when he is aware of the falsity of the facts he denounces, when he acts with revenge or trying to harass or harm the denounced collaborator at work or personally or tries to harm the interests of any company that is part of the UQUIFA Group.

This guarantee also extends to any person involved in the investigation (e.g. witnesses, injured person, etc.), provided that their intervention is carried out in good faith.

- **Communication of the conclusion of the procedure**

The complainant whenever he leaves a valid means of communication – except in cases of anonymous reporting – has the right to be informed of the conclusion of the procedure regardless of the outcome of the investigation.



## 2.2. Rights and guarantees of the accused

- **Rights of defence and contradiction**

Upon receipt of the complaint and its admission to processing, the accused must be informed of the initiation of the procedure and its purpose, unless for reasons of the investigation it is necessary to delay this communication.

Once the initiation of the procedure has been communicated, the accused will have the right to provide as many means of evidence as he deems necessary and appropriate for his defense. Likewise, it will have access to all the evidence that may have been collected, but, in no case, to the identity of the complainant. During the investigation, the defendant shall have the right to make all allegations in good faith that he or she deems appropriate for his or her defence. In any case, once the investigation has been concluded, and before the issuance of the resolution, a hearing must be held for allegations to the accused.

- **Presumption of innocence**

When there are indications that an employee has carried out activities that contravene the provisions of the Code of Ethics and Conduct, the presumption of innocence and objectivity in relation to the facts denounced will be guaranteed throughout the investigation procedure and until the issuance of a resolution. For this reason, no restrictive or coercive measures may be carried out against him/her, but only measures to secure evidence may be imposed when they are strictly essential.

- **Comunicación de la conclusión del procedimiento y resolución motivada**

It will be communicated in writing and with substantiated reasons to the collaborator denounced of the conclusion and resolution of the investigation.

In cases where the *ECI Officer* or *Local Compliance delegate* deems it appropriate, the inadmissibility may also be notified to the persons mentioned in the communication.

- **Confidentiality of the Procedure**

The confidentiality and reservation of the procedure is guaranteed. Any leaks during processing will be duly investigated.



### 3. ROLES AND RESPONSIBILITIES

The following are the functions and responsibilities of each of the bodies involved during the investigation procedure of a complaint -from its reception to its resolution and conclusion-:

- **Board of Directors**
  - Grant autonomy, resources, and authority to the *ECI Officer / Local Compliance delegate* and Instructor Committee of the Ethical Channel, if necessary, to carry out ongoing investigations.
  
- **Executive Management**
  - Guarantee the independence of action of the members of the Instructor Committee of the Ethical Channel.
  - Report to the Board of Directors the ongoing investigations and the results of the investigations concluded.
  - Analyze and, where appropriate, approve the disciplinary measures proposed by the Instructor Committee of the Ethical Channel.
  
- ***ECI Officer / Local Compliance delegate***
  - After the evaluation of the complaint and considering those people who may be linked to the facts reported and based on the complexity of the case, the *ECI Officer / Local Compliance delegate* may appoint two members of the Compliance Committee that it considers most appropriate to carry out the investigation and form part of an Instructor Committee of the Ethical Channel.
  - Report to the Executive Management the disciplinary measures proposed by the Ethics Channel Instructor Committee.
  
- **Ethics Channel Instructor Committee**






The Instructor Committee will be composed of the *ECI Officer / Local Compliance delegate* and two members from among the following: *Chief Financial Officer, HR Manager, SHE Corporative Manager, Global Quality Director, Site Manager or persons deemed most appropriate.*

- Perform the fieldwork of research.
  - Prepare a final report of the investigation and make the proposal for disciplinary measures.
- 
- **Workers' legal representatives**
    - Collaborate in those investigations that require their knowledge and action, in application of the corresponding rules.
  
  - **Employees of the UQUIFA Group**
    - Collaborate in the investigation procedure if required or involved.

## 4. TYPE AND MEANS OF COMMUNICATION

The UQUIFA Group has made available the Ethical Channel is accessible via email, postal or telephone address, through which all communications must be formulated, using the communication form enabled for this purpose and which is made available to all collaborators (see **Annex I**).

The management and access routes to the Channel are distinguished according to the country and are the following:

<p><b>SPAIN, INDIA</b> (and any country without a specific channel)</p> <p> <a href="mailto:ccompliance@uquifa.com">ccompliance@uquifa.com</a></p> <p> C/Mallorca 262 3rd floor, Barcelona 08008 at the attention to the Ethics, Compliance &amp; Integrity Officer.</p>	<p><b>MEXICO</b></p> <p> <a href="mailto:eticaycumplimiento@uquifa.com.mx">eticaycumplimiento@uquifa.com.mx</a></p> <p> 777 3295011</p>
	<p><b>HUNGARY</b></p> <p> <a href="mailto:etikusviselkedes@soneas.com">etikusviselkedes@soneas.com</a></p>

The Ethical Channel is a confidential medium and two types of communications can be made through it: consultations and complaints.

### 4.1. Consultations

The purpose of the consultations is to raise existing doubts about the UQUIFA Group's Code of Ethics and Conduct, any other internal regulation, or the applicable legislation in force, or about which there is doubt about its application, when it is related to the matter of ethics or crime prevention and affects professional performance.

Consultations are exclusively reserved for UQUIFA Group employees.



### 4.2. Complaints

The purpose of the complaints is the communication of risks or breaches of the Code of Ethics and Conduct, of any other internal norm or of the applicable legislation, especially for the communication of the commission of crimes. By means of this type of communication, it will be possible to inform of the infractions that have already been committed, of those that are foreseen, by means of reasonable indications, that they are going to be committed, or even of the risks that could facilitate their commission.

## 5. QUERY MANAGEMENT PROCEDURE

### 5.1. Reception, resolution, and communication of the consultation

When a query is received through the means provided for this purpose, an acknowledgment of receipt of the communication will be sent.

Queries whose content is outside the object of the Ethical Channel or that is made with disrespectful language or is made in bad faith will not be admitted.

As for the query, it will be analyzed by the *ECI Officer* or *Local Compliance delegate*, responsible for the Ethical Channel and will issue a response within a maximum period of **two months** from its receipt.

## 6. COMPLAINTS MANAGEMENT PROCEDURE

### 6.1. Receipt and admission of the complaint

When a complaint is received through the means authorized for this purpose, an acknowledgment of receipt of the communication will be sent. Subsequently, the *ECI Officer* or *Local Compliance delegate* will analyze the complaint and proceed to issue a reasoned resolution agreeing to the admission to processing or, where appropriate, the inadmissibility of the complaint within a period not exceeding **one month**.

Below are the necessary indications for the complaint to be admitted for processing:

- Possible people involved in the event.
- Description of the facts or potentially irregular conduct.
- Date or period of events.
- The way in which the possible unlawful conduct has been carried out.
- Area/function/location/work center/project/affected.
- All useful documentation that supports the basis of the fact denounced.

Likewise, to carry out the complaint through the Channel, the form included in **Annex I** may be used.

Once the communication or complaint has been made, and received by the *ECI Officer* or *Local Compliance delegate*, the management and processing will be carried out as contained in the following sections.

When a duly formulated complaint is received, that is, with the regulated content, the complainant collaborator will be responded to inform him/her that his/her complaint has been correctly received. Likewise, a clause relating to the Protection of Personal Data will be included in the response.

If the complaint does not have all the necessary information to initiate the investigation, the complainant may be asked for additional or complementary information to admit the complaint.

Those complaints that are not related to the object of the Ethical Channel or that a potential breach cannot be extracted from its drafting will be inadmissible.

## 6.2. Research phase

Once the complaint has been admitted for processing, the *ECI Officer* or *Local Compliance delegate* will proceed to open a file, within a period not exceeding **4 working days**, giving rise to the beginning of the investigation phase.

The research phase will be led by the *ECI Officer* or *Local Compliance delegate* or Instructor Committee of the Ethics Channel. If it is directed by the Instructor Committee of the Ethical Channel, the member members will be appointed by the *ECI Officer* or *Local Compliance delegate* after the admission of the complaint to processing being, therefore, responsible for the processing of the file. Likewise, it shall reserve the right for the complainant to propose the members of said Committee.

Persons who may be linked to the facts denounced may not be appointed to the Committee. For this reason, the *ECI Officer* or *Local Compliance delegate* will analyze in detail the facts and persons potentially involved based on the complaint received and will appoint two people to be part of the Ethics Channel Instructor Committee from among the following positions: Chief Financial Officer, HR Manager, SHE Corporative Manager, Global Quality Director, Site Manager or persons deemed most appropriate.

In the Report it will be essential to include the detailed documentation of all the actions developed and the documents that have been collected to obtain sufficient and adequate evidence.

To this end, the *ECI Officer* or *Local Compliance delegate* or Instructor Committee may carry out all the steps it deems necessary for the clarification of the facts denounced and collection of evidence. Among the possible steps is the review of documents or records, the analysis of procedures, or the conduct of interviews, among others. One of the steps will be the examination of the evidence provided by the complainant, if necessary, more information or evidence will be requested.

## 6.3. Communication to the accused

Once all the information and evidence has been collected, the defendant will be heard so that within **five working days** he or she may formulate the allegations and provide the documentation, evidence, or evidence that he or she considers pertinent for his or her defense. The failure to present allegations or documentation may not be considered in any case as an assumption of fault on the part of the accused, so that the procedure must proceed through the determined channels.

During the period determined in the preceding paragraph, the person(s) responsible for the investigation shall examine the documents and witnesses to verify the commission of the possible infringement.

Finally, the defendant will be heard, who may be assisted by the union representatives so that they can testify and propose those tests that they consider necessary for the defense of the complaint.

## 6.4. Resolution

Once the investigation phase of the case is completed, the *ECI Officer* or *Local Compliance delegate* or Investigative Committee must issue a reasoned resolution by means of a report detailing the results of the investigation of the case.

The Report may have two possible resolutions:

1. Where the **file is found to be irrelevant** either because sufficient evidence has not been provided, or because a complaint has been found in bad faith or because it has not been possible to conclude the commission of any infringement, the proceedings shall be closed.
2. Declare the **commission of an irregularity or breach of internal regulations or applicable current legislation**, urging the Human Resources Department to apply the corresponding disciplinary regime and referring it to executive management for approval of disciplinary measures and application of possible additional measures.

The Human Resources Department will be responsible for deciding the disciplinary measures to be applied to the accused as established in the appropriate disciplinary regime. Sanctions shall be graduated according to the gravity of the acts committed.

The following is the information that, at a minimum, the resolution must contain:

- Detail of the facts investigated, the identification code of the file assigned in the registration phase and date of receipt of the complaint.
- Identification of the intervening subjects.
- Detail of the procedures performed during the investigation.
- Detail of the results obtained for each of the procedures performed, as well as the evidence that supports these conclusions.
- Conclusions or assessment of the facts.
- Proposal of disciplinary measures or their imposition.
- Analysis and explanation of the weakness of internal control that has allowed the situation investigated, if any have been identified.
- Proposal for a Remediation Plan in the event of any weaknesses identified.

The *ECI Officer* or *Local Compliance delegate* will oversee communicating the proposed disciplinary measures to the Executive Management formally. The decision and adoption of measures will be taken by the Executive Management, as established in the General Procedure of Management of the Ethical Channel.

## 6.5. Deadline to resolve

From the opening of the file, the reasoned decision must be issued within a period not exceeding **three months**. However, if the case requires it, either due to the complexity or the size of the investigation or the nature of the facts denounced, this period may not be extended and may not exceed in any case **twelve months** from the opening of the file.

## 6.6. Communication to the complainant and denounced

Once the resolution has been issued and the disciplinary measures have been agreed, if appropriate, it will be communicated to both the complainant and the accused. As for the accused, he/she will only be informed of the meaning of the resolution.

## 7. PERSONAL DATA PROTECTION

The *ECI Officer* or *Local Compliance delegate*, as responsible for the Ethical Channel, will treat the personal data received through the Channel in a confidential manner, in accordance with the purposes established in this Procedure and in accordance with current legislation on this matter. Likewise, and as security measures, the UQUIFA Group will adopt the necessary technical and organizational measures to guarantee the security of the data and avoid its alteration, loss, treatment, or unauthorized access, in compliance with the provisions of the legislation on the protection of personal data.



After the period of **three months** from the formulation of the complaint, the data will be deleted from the Ethical Channel system, except for the purpose of leaving evidence of the operation of the system. Exclusively in cases where an investigation procedure is being carried out, they may be kept in external media, and accessible exclusively by the management body.

Without prejudice to the foregoing, the personal data included in the communications may be provided, both to the administrative or judicial authorities, to the extent that they are required by them because of any judicial or administrative procedure related to the object of the complaint, and to the persons strictly necessary in any diligence essential for the resolution of the investigation.

## 8. TRAINING AND COMMUNICATION OF THE ETHICAL CHANNEL

The UQUIFA Group will carry out training sessions and periodic dissemination and communication actions, to inform all the collaborators of the existence of the Ethical Channel, its purpose, and this Procedure, which will always be available on the corporate website.

## 9. VALIDITY AND REVISION

The Ethical Channel Management Procedure enters into force at the moment it is approved by the Board of Directors of Uquifa Sciences S.L.U. (in its capacity as the dominant entity of the Group). Each version of this version will remain in effect until it is repealed by a later version.


To ensure the effectiveness of this Procedure, it will be subject to periodic review and updating by the Compliance Committee.

All material modifications made to it must be submitted to the Board of Directors of Uquifa Sciences S.L.U., except those of a minor nature or mere development, which do not imply a substantial change in the values and principles of the Group, as well as in its commitments in terms of Compliance, its approval by the Compliance Committee is sufficient in these cases. In any case, it will be understood that a modification is material when it may have an impact on compliance with the provisions of the applicable regulations.

**Approved by the Board of Directors of Uquifa Sciences S.L.U. on 2<sup>nd</sup> August 2022.**



## Annex I

<b>COMMUNICATION FORM</b>		
<b>Name and surname</b>		
<b>Email</b>		
<b>Telephone</b>		
<b>Date</b>		
<b>Communication type</b>	<input type="checkbox"/> Consultation <input type="checkbox"/> Complaint	
<b>Relationship with UQUIFA Group</b>	<input type="checkbox"/> Employee <input type="checkbox"/> Supplier <input type="checkbox"/> Client <input type="checkbox"/> Others:	
<b>Select the option that you think best suits what you want to communicate</b>	<input type="checkbox"/> <b>Failure to comply with the laws, regulations, internal rules, and procedures</b> that apply or may apply to the UQUIFA Group. <input type="checkbox"/> <b>Theft or fraud.</b> <input type="checkbox"/> <b>Unethical conduct and/or conflicts of interest.</b> <input type="checkbox"/> <b>Manipulation or data falsification.</b> <input type="checkbox"/> <b>Another situation detected</b> and not included in the above categories that does not comply with the provisions of the Code of Ethics and Conduct of the UQUIFA Group.	
<b>Description of the reported event or query</b>		
<b>¿Do you have evidence of the reported facts?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<b>Type of test:</b>
<b>¿Have you brought such facts to the attention of politics, justice or other bodies?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<b>Organization and date:</b>

## LEGAL NOTICE

## Purpose

Uquifa Sciences S.L.U., Union Quimico Farmaceutica S.A.U., Soneas Chemicals LTD, Uquifa Mexico S.A. de C.V. and Uquifa India Private Ltd (hereinafter, "**UQUIFA Group**") puts at your disposal an Ethical Channel to make complaints of breaches and commission of crimes that is managed by **UQUIFA Group**.

Complaints must always be made under criteria of veracity, clarity and completeness, and must not be used to achieve objectives other than those defined in the Group's Code of Ethics and Conduct. The imputation of facts knowing their falsity could imply labor, civil or even criminal responsibilities for the complainant.

## Guarantees

Guarantee of confidentiality: **UQUIFA Group** guarantees the confidentiality of personal data and information received through the Ethical Channel. The identity of the complainant will be considered confidential information, not being, therefore, communicated without his consent to the denounced, avoiding any type of response to the complainant by him, because of the communication received.



Guarantee of indemnity: **UQUIFA Group** guarantees that the complainant will not be subject to any type of retaliation for any complaint made in good faith. If it is confirmed that said person has been subject to any type of reprisal, the perpetrators will be subject to investigation and, where appropriate, sanction.

Guarantee of access control: **UQUIFA Group** guarantees that access to the data contained in the Ethical Channel is limited exclusively to the Procedural Instructor Body. However, in exceptional cases, access may be given to other persons outside the Instructor Body, when their action is necessary for the adoption of disciplinary measures, or for the processing of judicial proceedings, which may be appropriate.

Guarantee of rights during the investigation: **UQUIFA Group** will guarantee during any investigation the rights to privacy, defense and the presumption of innocence of the persons investigated and other participants in the procedure.

#### LOPD CLAUSES

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, DIRECTIVE (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019 on the protection of persons reporting breaches of Union law and Organic Law 3/2018, of December 5, Personal Data Protection and guarantee of digital rights, it is reported that Uquifa Sciences S.L.U., Union Quimico Farmaceutica S.A.U., Soneas Chemicals LTD, Uquifa Mexico S.A. de C.V. and Uquifa India Private Ltd (hereinafter, "**UQUIFA Group**"), as manager of the Ethical Channel will treat the data collected in this form and those generated as a result of the research carried out, with the sole purpose of processing and deciding on the admission to processing of complaints received within the framework of the management model for the prevention of crimes of the Organization, proceed to their analysis, instruct the files and carry out the actions that proceed to this effect.

**UQUIFA Group** has implemented the measures that guarantee the adequate security and confidentiality of the information, that referring to the complainant.

Your data will not be communicated to third parties except legal obligation. However, depending on the facts reported, **UQUIFA Group** may be obliged to disclose or communicate your personal data, and the information provided by you, to the State Security Forces and Bodies, to other bodies of the Public Administration with competence in the investigation of the facts denounced, as well as to the Courts of Justice and other jurisdictional bodies.

Notwithstanding the foregoing, if a complaint turns out to be false, your data may be communicated to the person or persons denounced so that they can, if they deem it appropriate, initiate legal actions that assist them on the occasion of the false complaint, as well as to the collaborators involved in judicial or administrative proceedings initiated as a result of the investigation.

The personal data provided by you will be processed for the time necessary to decide on the appropriateness of initiating an investigation into the facts reported and, where appropriate, for the processing of it. If the investigation concludes with the archiving of the investigations, they will be deleted. In any case, after three months from the formulation of your complaint, **UQUIFA Group** will proceed to the deletion of your personal data from the Ethical Channel, without prejudice to the fact that they can continue to be treated, if necessary, for the completion of the investigation, as well as to purify the irregularities detected through, among others, judicial, administrative, or labor measures.

We inform you that at any time you can exercise your rights of access, rectification, limitation of treatment, deletion, portability and opposition if this is relevant in accordance with the applicable regulations on the protection of personal data, being able to make them effective by means of a written communication dated and signed, accompanied by a photocopy of the DNI (and, where appropriate, of the person representing it) and an address for the purposes of notifications, addressed to the registered office of **UQUIFA Group**; or to the email address [dpo@uquifa.com](mailto:dpo@uquifa.com). In this sense, the exercise of their rights by the accused is guaranteed, without this implying providing the latter with the data of the complainant. Finally, users are informed that they have the right to seek the protection of the Data Protection Spanish Agency.

I accept the conditions of the LOPD clause.

I accept the conditions of the Legal Notice.



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Chemistry for a better life

