

INTERNAL INFORMATION SYSTEM MANAGEMENT PROCEDURE TELECOMING S.A.

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Telecoming S.A. (hereinafter, Telecoming or the Company), and in particular its Governing Body, in compliance with the provisions of Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption (hereinafter, the Law), has approved this Internal Information System Management Procedure (hereinafter, the Management Procedure) which regulates the procedure and guarantees applicable to the management of the Internal Information System.

1. System Manager.

Telecoming has designated a natural person as the Manager of the Internal Information System who exercises their responsibility independently and autonomously. The Manager of the Internal Information System, having the necessary personal and material means to do so, will proceed in accordance with this Management Procedure in the processing of any communication received through the internal reporting channel.

2. Access to the internal reporting channel.

The internal reporting channel is the preferred mechanism that Telecoming makes available through its website to all employees, executives, and administrators, as well as to any third party who interacts or has interacted with it, such as suppliers, contractors, interns, external personnel, and former employees, so that they have a reliable means that guarantees confidentiality and the absence of retaliation when communicating and reporting irregularities that may involve a regulatory breach in accordance with the provisions of Article 2 of the Law.

Communications may be made in writing or verbally. The Company makes the following communication channels available to the reporting person:

- Email: denuncias@telecoming.com
- Postal mail: Paseo de la Castellana 95, Torre Europa, planta 16, 28046, Madrid, Spain.
- Face-to-face meeting requested through the other channels.

The reporting person who wishes to maintain their anonymity may submit their communication or report via postal mail without a return address. In this case, no acknowledgment of receipt will be received, and it will not be possible to receive a response or information regarding the processing or status of the report.

3. Guarantees and principles.

The guarantees and principles governing the operation of the internal reporting channel are:

- Guarantee of confidentiality of the informant's identity in communications and throughout the information management process.
- Guarantee of protection for the whistleblower and absence of retaliation in the context of communications and reports made in good faith.
- Possibility of maintaining communication with the informant and requesting additional information if necessary.
- Possibility of submitting anonymous reports.
- Guarantee of respect for the presumption of innocence and the honor of the persons affected by a report.
- Right of the person affected by a report to be informed of the actions or omissions attributed to them and to be heard at any time.
- Compliance with applicable personal data protection provisions. Other guarantees and rights provided for by law.

4. Acknowledgment of receipt.

The System Manager will acknowledge receipt of the submitted communication within a maximum period of seven (7) calendar days from the date of receipt through the same channel by which it was received, provided that the confidentiality of the communication is not compromised. If the reporting person has submitted the information anonymously or has expressed their desire not to be contacted, no acknowledgment of receipt or any subsequent communication will be carried out. If they wish to receive the acknowledgment of receipt or additional information through another channel, the reporting person must communicate the desired channel at the time of submitting the communication or report.

5. Resolution.

The System Manager will respond to the investigation actions within a maximum period of three (3) months from the receipt of the communication or, if receipt was not acknowledged, three (3) months from the expiration of the seven-day period after the communication was made, except in cases of particular complexity in which this period may be extended for an additional three (3) months.

6. Personal data protection.

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In the management of the internal reporting channel, compliance with applicable personal data protection regulations will be ensured at all times. You can consult our Privacy Policy at the following link: <https://www.telecoming.com/en/politica-privacidad/>

7. External channels.

The Law establishes the creation of an External Information Channel and the appointment of an Independent Whistleblower Protection Authority. Reporting persons may also submit their communications or reports to said Authority or to the corresponding regional authorities or bodies, either directly or following prior communication through the corresponding internal channel. Information on accessing the External Channel will be communicated once it has been created and appointed.