Annex 4

WHISTLEBLOWER MANAGEMENT PROCEDURE

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1. NATURE AND PURPOSE

1.1. Nature

This Whistleblower Management Procedure (hereinafter, the "**IRS Procedure**") is an integral and inseparable part of the ULMA Group Compliance System.

Unless expressly stated otherwise, capitalised terms in the Policy shall hereinafter have the meaning ascribed to them in the Compliance Framework Document, to which this document is an Annex.

The content of the Compliance Framework Document shall be directly applicable to this IRS procedure.

1.2. Purpose

The purpose of this document is to define the procedure for managing the Reports received through the Whistleblower Channel, as well as the ex officio actions of the Compliance Bodies, all in accordance with the provisions of Law 2/2023, of February 20, governing the protection of persons who report regulatory violations and the fight against corruption when applicable (hereinafter, the "**Whistleblower Protection Act**").”).

1.3. Definitions

In addition to the defined terms contained in the Compliance Framework Document, for the purposes of this IRS Procedure, the following terms shall have the meanings as indicated below:

“**Whistleblower Channel**”	Means each of the communication channels for Violations implemented in ULMA's Cooperatives.
“**External Channels**”	Means the channels for reporting certain Violations to the competent public authorities provided for in the Whistleblower Protection Act.
“**Information**”	Means the facts or signs from which the existence of a Violation is deduced.

"**Reports made in Bad Faith**"	Means a report that: (i) is not based on facts or evidence from which the existence of a Violation may reasonably be inferred; (ii) is false, misrepresented or unlawfully obtained; (iii) is reported with a spirit of revenge, harassment or defamation; or (iv) is exclusively intended to cause personal or professional harm to the Reported Person or to ULMA's Cooperatives.
"**Whistleblower**"	Means a natural person who reports a violation based on information obtained in an occupational or professional context. This consideration may include, but is not limited to, the following: members and employees, suppliers, contractors, subcontractors, scholarship holders, trainees, job applicants, persons who have maintained an employment or statutory relationship with the ULMA Cooperative in question, even if such relationship is terminated.
"**Violation**"	Means (i) criminal, serious administrative or very serious breaches under Spanish law, (ii) infringements of European Union Law as set forth in Article 2 of the Whistleblower Protection Act and (iii) material breaches[1] of the provisions of the Compliance System.
"**Reported Person**"	Means the natural person to whom a Report refers as the person to whom the Violation is attributed (as directly responsible or as a cooperator) or with whom the Violation is associated and who corresponds to the concept of "Affected Person" as used in the Whistleblower Protection Act.
"Proof or Direct Knowledge"	In an employment or professional context, having witnessed the events potentially constituting a Violation and/or knowing of their existence in any

[1]For the purposes of determining "material breaches of the provisions of the Compliance System" mere violations of the employment regulations in force in ULMA Cooperatives and Subsidiaries shall not be considered, even if they may involve conduct described in the provisions of the Compliance System, provided that such violations are not significant for regulatory compliance purposes, are not related to possible situations of Harassment in ULMA Cooperatives and do not in turn constitute a breach of sections (i) or (ii). These violations will be managed in accordance with the procedure for workplace misconduct established by the relevant entity.

	provable way.
"**Reprisal**"	Means intolerable and unjustified conduct towards whistleblowers, such as termination of contracts, intimidation, unfavourable treatment, reputational damage, etc., and, in general, all those mentioned in Article 36.3 of the Whistleblower Protection Act.
"**Person responsible for the IRS**"	Means the natural person or collegiate body appointed by the Board of Directors of each Cooperative with respect to an entity and who is responsible for the management of the IRS.
"IRS"	Means the Internal Reporting System and Whistleblower protection.

2. GENERAL ASPECTS

2.1 Reporting Violations

Violations may be reported through the Internal Information Channel, provided that the reported facts refer to Violations of a ULMA Cooperative or Subsidiary, or affect the professional relationship of the Reported Person, as the case may be, with an ULMA Cooperative or Subsidiary.

In any case, it will be compulsory to report possible Violations through the Internal Information Channel for Members of the Cooperative and/or its Subsidiaries, when they have Proof or Direct Knowledge of them, who will acquire the status of Whistleblowers for the purposes of this procedure.

Communication shall not be mandatory for Members of the Cooperative and/or its Subsidiaries who are injured parties or victims of a Violation. Nor will it be mandatory for Members of the Cooperative and/or its Subsidiaries to make the report when they have no Proof or Direct Knowledge of the possible Violation.

Failure to report a possible Violation by Members of the Cooperative and/or its Subsidiaries, when they are obliged to do so, may result in disciplinary action. Reports made in Bad Faith may result in the corresponding sanctions, without prejudice to the civil or even criminal liabilities that may arise under current legislation.

In cases where the person reporting is a member of a Compliance Committee (or the Compliance Officer), the person in question shall refrain from participating in the decision to admit the case for processing and in the processing of the file, as the case may be.

Likewise, in cases where the members of the Compliance Committee or the Compliance Officer are aware of a possible Violation and, not having Proof or Direct Knowledge, are aware of the identity of the person(s) to whom such Proof or Direct Knowledge is attributed, they must officially register the Information. In such case, the regulations governing these situations in the following sections shall apply for its admission for processing, and they must abstain from participating in the processing of the file.

2.2 Whistleblower Channel

Without prejudice to any anonymous means of communication that may be specifically provided, the Report must be communicated, in writing or orally, by the following means:

(i) through ULMA's Cooperative Whistleblower Channel, by means of an electronic form available on the corporate website or voice messaging system; or

(ii) by written communication or by e-mail sent to the address established by the ULMA Co-operative concerned; or

(iii) by means of a face-to-face meeting within a maximum of seven days of the Whistleblower's request.

Verbal communications should be documented, subject to the Whistleblower's consent, in one of the following ways: (i) by a recording of the conversation or (ii) by a full transcript of the conversation which may be reviewed by the Whistleblower.

The Whistleblower may indicate a postal or e-mail address in their communication for the purpose of receiving notifications, and may also expressly waive the receipt of any further communication..

The Information must necessarily contain at least the following:

(i) The address and contact details of the Whistleblower for notification purposes, unless the Whistleblower expressly waives the receipt of any communication relating to the processing of the Investigation Files.

(ii) The identification of the reported Violation and of the Reported Persons, if applicable.

(iii) Details of the Proof or Direct Knowledge justifying the submission of the Report on the grounds of certainty or reasonable suspicion of the commission of a Violation, and which should be provided or referred to together with the Report if possible. If the person reporting the possible Violation lacks Proof or Direct Knowledge, they must identify the person(s) to whom they attribute such Proof or Direct Knowledge.

The Person responsible for the IRS will register all the Information received, whether or not they are admitted for processing and assign them an entry number. An acknowledgement of receipt shall be sent to the Whistleblower within seven calendar days of receipt of the Information, stating:

(i) the date and time of the communication of the Information and entry number;

(ii) information relating to the processing of personal data in accordance with the provisions of applicable law; and

(iii) an express mention that the Whistleblower's identity will not be communicated to the persons referred to in the information or to third parties.

All of the above unless the Whistleblower has expressly waived receipt of communications relating to the investigation or unless this would jeopardise the confidentiality of the communication of the Information.

The confidentiality of the communication and the identity of the Whistleblower and any third party mentioned in the communication shall be protected by sufficient technical measures and the organisational measures outlined in this procedure, which shall be kept to a minimum.

In the event that any Person of the corresponding ULMA Cooperative or, where applicable, of its Subsidiary, other than the Whistleblower, receives Information relating to a potential Violation, he/she must immediately forward it to the corresponding Person responsible for the IRS, preserving the confidentiality of said Information and, where applicable, the identity of the Whistleblower. The Person Responsible for the IRS shall ensure that the above referral obligation and the consequences of non-compliance are reported.

Without prejudice to the preferential channel of the internal channel for the communication of possible Violations, Whistleblowers of Violations under headings (i) and (ii) of the definition of Violation (i.e., criminal, serious administrative or very serious violations under Spanish law and violations of European Union law in accordance with the provisions of Article 2 of the Whistleblower Protection Act) may access the External Channels before the competent authorities provided for in the Whistleblower Protection Act, either directly or after communication through the internal channel.

3. PROCESSING THE CASE FILES

"**Investigation Case File**" means the set of actions carried out for the verification and clarification of the facts contained in the Reports received by the Person Responsible for the IRS.

3.1 Facts pending court decision

When the facts that are the subject of the Report are being investigated by a competent external authority or are *sub judice* (pending a judicial decision), or when such circumstances arise, without prejudice to the necessary "case by case" analysis, as a general rule, an investigation into the report shall not be initiated (or the one already initiated shall be suspended). The corresponding case file shall be opened and expressly held in abeyance for this reason until the external process has been completed, with the Whistleblower being informed of this circumstance, provided that the communication is not anonymous or the Whistleblower has not waived the right to receive notifications.

3.2 Notifications

Notifications to be sent to the Whistleblower, as well as to persons from the ULMA Cooperative and other third parties related to the Investigation Case File, shall be sent from a specific platform or from an e-mail address that allows communication with these persons and the receipt of their responses in a reserved and confidential manner, so that only the Person Responsible for the IRS or, where appropriate, the body in charge of the investigation has access to the content of these communications, in compliance with the regulations on the protection of personal data.

3.3 Admissibility/inadmissibility for processing

Once the Information has been received and registered, and having verified that the Information has the minimum content indicated in section 2.2 and having ruled out the existence of a conflict of interest, the person responsible for the IRS must decide whether to admit it for processing, with the possibility of seeking external advice if necessary.

The Person Responsible for the IRS shall check whether the Information received relates to facts that potentially constitute a Violation as defined in this procedure. To this end, the Person Responsible for the IRS may request additional clarifications from the Whistleblower, unless the latter has waived the right to receive notifications or is an anonymous Whistleblower, and shall establish the deadline for replying that it deems appropriate in view of the circumstances of each case.

In particular, if the person communicating the information lacks Proof or Direct Knowledge, but identifies the person(s) to whom they attribute the Proof or Direct Knowledge prior to its admission for processing, the Person Responsible for the IRS must interview this/these person(s) for the sole purpose of them stating whether or not they endorse the Information communicated, documenting it in accordance with the provisions of section 3.4.c) below.

The Person Responsible for the IRS will decide within ten (10) working days after the registration of the information whether it is admissible or inadmissible for processing.

In this regard, it is inadmissible if:

(i) The facts reported lack any credibility.

(ii) The facts reported do not constitute a Violation as defined in this procedure.

(iii) The facts reported are manifestly unfounded or there are, in the opinion of the person in charge of the IRS, reasonable indications that the information received has been obtained through the commission of an offence.

(iv) The facts reported do not contain significant new information on a Violation as compared to a previous Report in respect of which the relevant proceedings have been concluded, unless there are new factual or legal circumstances which justify a different follow-up.

(v) The person communicating the information lacks Proof or Direct Knowledge of the potential Violation and does not identify the person(s) to whom they attribute Proof or Direct Knowledge.

(vi) The person communicating or recording the Information lacks Proof or Direct Knowledge of the potential Violation and, having identified the person(s) he/she attributes as having Proof or Direct Knowledge of the same, said person(s) does/do not corroborate the Information.

In the case of Information that is accepted for processing in which the person who originally communicated the Information lacked Proof or Direct Knowledge, but had identified the persons to whom they attributed said Proof or Direct Knowledge and the Information was corroborated by them, both the person who made or recorded the initial communication and the person(s) who subsequently corroborated it, shall acquire the status of Whistleblower.

In the event that the facts that are the subject of the Report received could be indicative of a criminal offence, the person responsible for the IRS shall inform the Management and the Governing Board of the corresponding ULMA Cooperative (except for any Reported Persons) of this circumstance. The Governing Council, following any reports deemed necessary and provided that this is compatible with the rights of the entity concerned under the law, shall immediately forward the information to the Public Prosecutor's Office. If the facts affect the financial interests of the European Union, it shall be referred to the European Public Prosecutor's Office.

Provided that the Whistleblower has not waived the right to receive notifications or that their anonymity (if applicable) is not jeopardised, the final decision on the admission or rejection of the Information must be communicated to the Whistleblower within five (5) working days following the adoption of the decision, together with the reasons for rejection, as appropriate.

3.4 Instruction phase

After admission for processing, the investigation phase will begin, in which the investigative actions deemed necessary to verify the Truthfulness of the information admitted for processing will be carried out. The deadline for carrying out the investigative actions may not exceed three (3) months from the date of receipt of the Information, except in cases of particular complexity that require an extension of the deadline, in which case it may be extended up to a maximum of three additional months. If no acknowledgement of receipt was sent to the Whistleblower (because the Whistleblower is anonymous or does not wish to receive notifications), the three months will be counted from the expiry of the seven calendar day period following receipt of the Report.

The Person Responsible for the IRS must document all actions in an appropriate and sufficient manner in order to ensure traceability and to ensure their accreditation to a possible third party.

By default, the Person Responsible for the investigation phase (the "**Investigating Body**") will be the Person Responsible for the IRS. However, the instruction may be entrusted to another Member of Personnel of the ULMA's

Cooperative or, if applicable, a Subsidiary or its Legal Advisor or the Compliance Officer.

The body responsible for its resolution will be, by default, the Manager of the ULMA Cooperative, whether it is a matter affecting the Cooperative itself or a Subsidiary (the "**Resolution Body**"). Notwithstanding the foregoing, the Governing Board may, alternatively and in relation to Subsidiaries, agree on a permanent basis that the Resolution Body shall be another person or position, and state its reasons. If the Reported Person is the Manager, the Investigating Body may request the Chairperson of the Governing Board to act as the Resolution Body.

With regard to situations of conflict of interest, the provisions of the specific section below shall apply.

(a) Development of the Instruction

The Reported Person shall be informed of the commencement of the investigation and, succinctly, of the facts attributed to him/her, as well as of his/her right to be heard at any time and in the time and manner deemed appropriate to ensure the proper conduct of the investigation.

In the event that such Information could lead to the concealment, destruction or alteration of evidence by the Reported Person, it may be postponed until the time of his or her interview, and the reasons for such a decision shall be recorded in the Investigation Case File. In no case shall the Reported Person be informed of the identity of the Whistleblower or be given access to the reported Information.

Likewise, if, as a result of the investigative actions carried out, other facts are discovered that could constitute Violations, the Investigating Body shall agree to open a new Investigation Case File or, if they are related to what has been investigated in the current Investigation Case File, to expand it.

In any case, if as a result of the investigative actions carried out during the course of the Investigation Case File, indications of the possible commission of an offence are identified, the Person Responsible for the IRS will communicate this circumstance to the Management and the Governing Board of the corresponding ULMA Cooperative (except for Reported Persons). The Governing Council, following any reports deemed necessary and provided that this is compatible with the rights of the entity concerned under the law, shall immediately forward the information to the Public Prosecutor's Office. If the facts affect the financial interests of the European Union, it shall be referred to the

European Public Prosecutor's Office.

a) Document Management

During the course of the investigation case file, all information and documentation that may contribute to the clarification of the facts under investigation will be collected.

Where necessary, access to corporate equipment, devices and IT systems shall be carried out in full compliance with personal data protection regulations and in a proportionate manner.

The documentation and information gathered will become part of the Investigation Case File and may be used to defend the interests and rights of the ULMA Cooperative.

The Investigating Body may rely on internal or external advisers and suppliers to carry out the technical work required. They shall establish the necessary technical safeguards to ensure confidentiality, data protection and chain of custody.

(b) Hearing and interviews

In the course of the investigation phase, the Investigating Body may conduct as many interviews as it deems necessary for the verification and clarification of the facts, with the presence of at least one other person.

- Reported Person: the hearing will include a private interview with the Reported Person in which, with due respect for the guarantee of the presumption of innocence, he/she will be informed of the facts that are the subject of the Investigation Case File and will be invited to give his/her full version of the facts, he/she shall be given the opportunity to provide the evidence he/she considers relevant to his/her defence, which shall be included in the Investigation Case File, and he/she shall be asked the appropriate questions depending on the circumstances of the case, and may refuse to answer all or any of the questions or to answer only the questions he/she deems appropriate. Furthermore, he/she will be made aware of the processing of his/her personal data, as well as to comply with any other duty required by the legislation on the protection of personal data.

- Other persons: the interview will begin by informing of the duty to maintain absolute confidentiality in relation to the current

Investigation Case File and their participation in it. All matters relating to the processing of personal data will be reported in compliance with the regulations applicable for this purpose. They will also be informed of their duty to cooperate in the course of the investigation, answering the questions put to them faithfully and truthfully and providing any information that may be available to them and which may be required of them in the course of the investigation.

A written record of the interviews shall be drawn up and shall contain the content of the interviews. The minutes shall be read to the person interviewed so that he/she may agree with the contents. In the event of discrepancies, these shall be analysed and, if appropriate, the necessary amendments shall be made to the minutes or the discrepancies shall be recorded. The minutes shall be signed by both the Investigating Body and the interviewee. If the interviewee does not wish to sign the minutes, this fact shall be recorded.

In addition, if the interviewee so authorises, instead of a written record, the interview may be recorded and included in the Investigation Case File. In this case, an equally effective alternative procedure shall be offered and the processing of image and/or voice data shall be included in the data protection information.

In the event that the Reported Person or any person duly summoned to appear within the framework of the Investigation Case File does not acknowledge receipt of the communications sent or does not confirm his/her participation in the investigation as requested, the Investigating Body will seek such confirmation by telephone or even through personal contact (guaranteeing at all times the confidential nature of the communication) and will document the result of the action taken. If after this communication he/she does not appear for the proceedings for which he/she was summoned, the Investigation Case File will continue its course.

In the event that third parties who do not have a contractual relationship with the Organisation do not come forward after the first written communication incorporating the information required by the data protection regulations, it will be understood that they do not wish to participate in the investigation. Consequently, no further communication shall be sent.

3.5 Proposed resolution

At the end of the investigation phase, the Investigating Body will submit a report, with the minimum contents indicated below, together with the Investigation Case File, to the Resolution Body so that the latter may resolve the case file in accordance with the terms of the following section:

(i) The identification code assigned to the communication of the information that gave rise to the Investigation Case File.

(ii) Chronological description of the main milestones in the processing of the Investigation Case File.

(iii) List of the investigative actions carried out to verify the plausibility of the facts that are the subject of the Information, as well as the documentation provided.

(iv) Assessment of the outcome of the investigative actions conducted and the conclusions reached.

(v) Proposed resolution.

3.6 Resolution of case files

The Resolution Body must resolve the Investigation Case File, within a maximum period of three (3) months from the receipt of the Information via the IRS for the specific case in question, in accordance with the conclusions reached in the report submitted, adopting one of the following resolutions:

(i) Favourable resolution: this shall be adopted in cases where it is considered that no Violation has been established, which shall result in the termination of the Investigation Case File without further action being taken. The Reported Person shall be notified of the decision.

(ii) Unfavourable resolution: this shall be adopted when it is determined that a Violation attributable to the Reported Person has been established. In this case, measures will be adopted in accordance with the provisions of section 5.7 of the Compliance Framework Document, as well as the measures of any nature that may be appropriate in accordance with the regulations in force, as well as the disciplinary measures that may correspond in accordance with the applicable disciplinary or sanctioning regime.

The outcome of the Investigation Case File will be communicated to the

Whistleblower, provided that the Whistleblower is not anonymous, has not waived receipt of notifications or the confidentiality of the Information received is not compromised.

4. WHISTLEBLOWER REPORTS REGISTER

The Person Responsible for the IRS shall keep a register of the reports and communications received and of the Investigation Case Files to which they have given rise, while guaranteeing the confidentiality of such information. The register shall contain the following elements:

(i) Date received.

(ii) Registry number.

(iii) Internal investigation procedure: yes/no.

(iv) Date closed.

The conservation of the information collected in the register will be carried out in compliance with the provisions of the personal data protection regulations and the Whistleblower Protection Act.

5. CONFLICTS OF INTEREST

If there is at any time any circumstance relating to any Information which may cause the Person Responsible for the IRS, or a member of the Investigating Body or the Resolution Body to have a conflict of interest or which in any way affects or may affect their neutrality or independence of action, that person must immediately bring it to the attention of the other members of the body concerned no later than three (3) calendar days after the date on which they received the Information.

In this case, the person in question must refrain from participating in any activity in relation to such Information, and, where applicable, the provisions of section 7 of the Regulations of the Compliance Bodies shall apply.

6. INFORMATION ON PERSONAL DATA PROTECTION

The processing of personal data carried out within the framework of the IRS shall be carried out in full compliance with the general principles and obligations laid down in the personal data protection regulations and the Whistleblower Protection Act.

The Person Responsible for the IRS will, inter alia, ensure that the following is respected:

(i) The **principle of transparency**, providing the information required for the protection of personal data. In particular, the Whistleblower will be informed that his or her identity will in all cases be kept confidential and will not be communicated to the Reported Person or to third parties except, where appropriate under the terms of the Whistleblower Protection Act, to the Judicial Authority, the Public Prosecutor's Office or the competent administrative authority within the framework of a criminal, disciplinary or sanctioning investigation.

(ii) The **principle of minimisation**, with no more data being collected than is strictly necessary and essential for the correct functioning of the IRS. If more data is collected than is strictly necessary, it will be deleted as soon as possible.

(iii) The **principle of limitation of the purpose**, whereby the personal data collected through the IRS must not be processed for any purpose other than the management of the communication and processing of the Case File.

(iv) The **principle of limitation of the conservation period**, whereby personal data must be processed only for the time that is absolutely necessary. In any case, once three (3) months have elapsed since the receipt of the communication without having initiated the investigation proceedings, the personal data must be deleted, unless the purpose of the storage is to leave evidence of the functioning of the system. Communications that have not been acted upon can only be conserved in anonymised form, with there being no obligation to block them as provided for in the data protection regulations.

(v) The **principle of accuracy**, whereby any personal data included in the reported information that is not truthful must be deleted. This is unless the lack of truthfulness may constitute a criminal offence, in which case the information will be stored for as long as necessary for the duration of the legal proceedings.

(vi) The **principle of integrity and confidentiality**, guaranteeing the confidentiality of the Whistleblower and third parties as indicated in the Procedure. Furthermore, all necessary technical and organisational security measures shall be put in place to protect the information against unauthorised or unlawful processing and against accidental loss, destruction or damage.