



## *Ethical channel regulation*

## Contents

1. Purpose.....	3
2. Confidentiality and non-retaliation.....	3
3. Scope .....	3
4. Roles and responsibilities .....	4
5. Complaints processing .....	4
Appendix I - Privacy policy of the ethical channel.....	6

	<b>ETHICAL CHANNEL REGULATION</b>	Code:	CIE CO CP M 03
		Revision:	02
		Page:	3 of 8

## 1. Purpose

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CIE Automotive, S.A. ("**CIE Automotive, S.A.** or "Group", indistinctly) has enabled channels that allow all the people who are directors, managers, employees and workers of all the member companies of the Group ("the people"), and its groups of interest, to report irregularities or any breach of the Code of Professional Conduct of CIE Automotive, S.A. (the "**Code of Conduct**"), as well as any conduct or behaviour contrary to the law and capable of generating criminal liability to those legal entities.

The channels enabled by CIE Automotive, S.A. are as follows:

- Electronic ethical channel: [whistleblowerchannel@cieautomotive.com](mailto:whistleblowerchannel@cieautomotive.com)
- Mail addressed to the Compliance Department at the following address:  
Alameda Mazarredo 69, 8º. C.P. 48009, Bilbao (Bizkaia), Spain.
- Information and communication channel on the intranet and the corporate website.

This document aims to regulate these mechanisms.

## 2. Confidentiality and non-retaliation

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All reports and queries may be made anonymously and must include a description of the report or query.

CIE Automotive, S.A. guarantees the utmost confidentiality of the complainant and other intervening parties during the proceedings, especially when disciplinary actions are implemented or when processing any legal actions that may be brought, if applicable.

All those involved in the investigation process, will be obliged to maintain a strict duty of confidentiality, within the framework of professional secrecy. Breach of this obligation by those people may lead to the legally applicable measures.

CIE Automotive, S.A. categorically prohibits the adoption of any reprisals, threats, coercion, penalties, or negative forms of discrimination measures taken to the detriment of the person making the complaint as a result of the reported incident, assuming the good faith of the complaint.

In guarantee of this principle, the person making the complaint may address the Compliance Department for the necessary guidance and protection against possible reprisals that could arise from the incident reported.

In any case, anyone who believes that they are being or have been subject to any form of retaliation, directly or indirectly, must make that clear.

Any person making a complaint relating to a breach of the Code of Conduct must have prima facie evidence to assert that the alleged breach poses a significant problem.

Any allegation that is shown to have been falsely brought in a malicious and knowing manner may give rise to the legal actions CIE Automotive, S.A. deems necessary.

## 3. Scope

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The mechanisms are in place to enable all those belonging to the Group or its groups of interest to report any irregularities or breaches of ethics or integrity or that infringe the guidelines established in the Code of Conduct.

	<b>ETHICAL CHANNEL REGULATION</b>	Code:	CIE CO CP M 03
		Revision:	02
		Page:	4 of 8

## 4. Roles and responsibilities

The Compliance Department is tasked with processing reports and consultations that will be studied and treated confidentially. The data of the people involved will be managed in accordance with the provisions of the Ethical Channel Privacy Policy (Appendix I).

It is the responsibility of the CIE Automotive, S.A. Corporate Social Responsibility Committee to ensure the existence of these channels, while the Compliance Department will be responsible for managing, maintaining and updating the channels.

All the reports will be collected and analysed by the Compliance Department that will decide the course of action in each case. When reports are received by mail or other means (e.g. via the Internal Audit Department or Human Resources Department) those departments have the obligation to forward the complaint to the attention of the Compliance Department.

## 5. Complaints processing

When a complaint is received via the ethical channel, the Compliance Department will decide the need to investigate it or not according to its relevance or nature. If it considers it unnecessary to analyse it, the Compliance Department will make a record of the complaint and communicate the decision to the person making the complaint.

If, however, the Compliance Department decides to investigate the complaint received, it will define an action plan to address it. The investigation may be carried out by the Compliance Department itself, the Internal Audit Department or may be delegated to a suitable person. Whoever is designated to carry out the investigation may, upon approval of the Chairman of the Corporate Social Responsibility Committee, the Secretary of the Board and the Manager of the Compliance Department, hire external auditors or other advisors to help investigate and analyse the results.

Those conducting the investigation will be empowered to interact with the source of the complaint for the purposes of gathering further details and to direct the investigation in an appropriate manner.

Once the investigation is complete, a report must be issued with reasonable details and with a clear account of the events, delivering a copy of that report to the Compliance Department. This report must contain at least the following information:

- ✓ Technical data (title, author, date, purpose and origin).
- ✓ Background of the file.
- ✓ Object and purpose of the investigation.
- ✓ Actions and aspects analysed.
- ✓ Documented results of the investigation.
- ✓ Recommended measures (disciplinary, corrective or preventive).

The Compliance Department must review the investigation report received and determine the actions to take depending on the results. The final approval of the corrective actions rests with the Corporate Social Responsibility Committee. In addition, a log will be presented containing details of all the complaints received, whether or not they were followed-up, to be presented periodically to the Corporate Social Responsibility Committee.

The ethical channel is based on the following basic principles:

- **Communication:** of suspicious behaviour that could entail some kind of breach.
- **Veracity:** reports made must address the reality of the facts.
- **Presumption of innocence:** those under investigation are presumed to be innocent throughout all phases of the proceeds until its completion, when the facts against them will be proven or not.

<b>Issued and revised:</b> Corporate Social Responsibility Committee	<b>Approved:</b> Board of Directors	<b>Date:</b> October 2019
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- **Confidentiality:** the absolute confidentiality of the complainant and others involved must be ensured.
- **Effective protection:** a comprehensive analysis and resolution of all reports made through the ethical channel is guaranteed.
- **Proportionality:** the gathering and compilation of information during the processing of the complaint will be strictly limited to what is objectively necessary.
- **Impartiality:** the reports made will be processed in an equitable, objective, comprehensive and independent manner.
- **Hearing:** the complainant and the reported person should be heard during the processing of the file, unless there are circumstances that prevent this.
- **Equal opportunities:** the complainant and the reported person will have the same opportunity for an effective and balanced hearing.
- **Defence:** the reported person may request and/or provide at any time of the investigation of the case the information, documentation or exculpatory evidence they consider appropriate.

	<b>ETHICAL CHANNEL REGULATION</b>	Code:	CIE CO CP M 03
		Revision:	02
		Page:	6 of 8

## Appendix I - Privacy policy of the ethical channel

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### 1. Purpose

The purpose of this privacy policy of the CIE Automotive, S.A. ethical channel is to inform about the processing of data carried out for the management and processing of complaints and of queries raised, that may arise through the channel.

For the correct configuration and design of the ethical channel, CIE Automotive, S.A. is fully compliant with the applicable rules on data protection, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and Spanish Organic Law 3/2018, of 5 December, on the protection of personal data and guarantee of digital rights.

Similarly, the ethical channel has been designed in accordance with the Legal Report 0128/2007 of the Spanish Data Protection Agency "Creating internal reporting systems in enterprises (whistleblowing mechanisms)", and with "Opinion 1/2006 on the application of EU data protection rules to internal whistleblowing schemes in the fields of accounting, internal accounting controls, auditing matters, fight against bribery, banking and financial crime", of the Working Party of Article 29 of the European Commission.

### 2. Data Controller

CIE Automotive, S.A. is the data controller.

- Address: Alameda Mazarredo, 69, piso 8º, Bilbao, 48009, Bizkaia
- Email: [gdpr@cieautomotive.com](mailto:gdpr@cieautomotive.com)

Complainants or those reported may use this address for any questions strictly related to the processing of their personal data and to exercise their legitimate rights, as detailed in section 6 "Exercise of Rights."

### 3. Processing of personal data and legal justification

The personal data collected in the ethical channel will be processed for the sole purpose of dealing with complaints and inquiries that are received and, as applicable, to investigate the reality of the facts reported.

Both the complainant and the reported party will be duly informed in each case, of the specific people and bodies to which their data will be communicated.

The processing of data by the ethical channel is carried out to fulfil a mission in the public interest, consisting in the management of an internal ethical channel that aims to prevent and detect possible behaviour that contravenes both the legal regulations in force and the internal regulations of CIE Automotive, S.A. All this in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

### 4. Data preservation time

The data of the complainant, of the reported person and of third parties will be kept for the time necessary to decide on the appropriateness of initiating an investigation into the facts reported and, as applicable, for as long as the investigation remains open.

<b>Issued and revised:</b> Corporate Social Responsibility Committee	<b>Approved:</b> Board of Directors	<b>Date:</b> October 2019
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	<b>ETHICAL CHANNEL REGULATION</b>	Code:	CIE CO CP M 03
		Revision:	02
		Page:	7 of 8

Therefore, when it is not considered appropriate to initiate an investigation, the data will be immediately blocked, preserving the data only for the legal limitation period for any claims that could arise from the report.

Similarly, if it is not necessary to process the data during the investigation, they may continue to be processed by the Corporate Social Responsibility Committee, or, where applicable, by the Board or any other internal body to which those powers are attributed.

## 5. Who will be the recipients of the data?

If necessary or when required, the data may be communicated to those third parties to whom it must be legally submitted, such as Public Bodies, state security corps and forces, judges and courts.

In addition, CIE Automotive, S.A. may rely on the collaboration of third-party service providers who may have access to the data subject's personal data and process that data on behalf of CIE Automotive, S.A.

In connection with the above, it is expressly stated that CIE Automotive, S.A. follows strict criteria for selecting service providers in order to comply with its obligations regarding data protection and undertakes to sign the corresponding data processing agreements with those providers, imposing, among others, the following obligations:

- Apply appropriate technical and organisational measures.
- Process personal data for the agreed purposes and take only the written instructions CIE Automotive, S.A.
- Delete or return the data once the provision of services ends.

Specifically, CIE Automotive, S.A. may engage the provision of services from providers who carry out their activity in the following sectors, by way of example and not limitation: legal advice, multidisciplinary professional service firms, suppliers of technological services, suppliers of IT services companies or physical security companies.

In particular, if CIE Automotive, S.A. opts for outsourcing the operation of the ethical channel to a third party, it must sign a data processing agreement with that third party that includes all the information required by section 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

In particular, this agreement must state that:

- The data processor will follow the instructions of CIE Automotive S.A. in the processing of data resulting from complaints processed.
- The processor will not use that data for any use not contemplated in this policy.
- The processor will implement the security, technical and organisational measures to ensure the confidentiality of information processed through the channel.
- The processor will not communicate any of the data obtained in the context of managing the ethical channel.
- The processor will destroy or return the data it has had access to once the service relationship with CIE Automotive, S.A. has concluded.

The above actions will not entail an international transfer of data. Notwithstanding the above, if it were exceptionally necessary to carry out any action that could entail an international transfer of data, before doing so, CIE Automotive, S.A. will strictly comply with the reporting and legal obligations established by the prevailing law at all times.

	<b>ETHICAL CHANNEL REGULATION</b>	Code:	CIE CO CP M 03
		Revision:	02
		Page:	8 of 8

## 6. Exercise of rights

Those people whose personal data is processed in the context of ethical channel proceedings have the following rights:

- a. They will be entitled to obtain confirmation on whether CIE Automotive, S.A. processing their personal or not in the management of the ethical channel data and to request access, rectification, cancellation, limitation of treatment and opposition to inaccurate data or where applicable, request its removal when, among other reasons, the data is no longer required for the purposes of managing the ethical channel.
- b. Under certain circumstances, to oppose the processing of their personal data.
- c. Data subjects may also complain to the Regulatory Agencies in each of the countries of the European Union by accessing the following website: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## 7. Principle of proportionality data minimisation

The personal data gathered in the course of ethical channel proceedings will be limited to the information that is strictly and objectively necessary to deal with complaints and, where appropriate, check their veracity, and to take legal action arising from the reported facts. This data will be treated at all times in accordance with applicable data protection regulations for legitimate and specific purposes in relation to any investigation that may arise as a result of the complaint and will be proportionate and not excessive in relation to the aforementioned purposes.

## 8. Security and confidentiality measures

CIE Automotive, S.A. will ensure that all the technical and organisational measures are adopted to safeguard the security of the data collected in order to protect them from unauthorised disclosure or access.

To this end, CIE Automotive, S.A. has adopted appropriate measures to ensure the confidentiality of all the data and to ensure that the data relating to the identity of the complainant is not revealed to the person reported during the investigation, respecting in any case the fundamental rights of that person, without prejudice to actions that may be adopted by the competent legal authorities in any case.