



# Standards for the Ethics Hotline Sener Group



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SENER Group's Code of Conduct formally establishes the values, references and standards that guide the behaviors of natural and legal persons in the SENER Group as well as their interactions with clients, suppliers and external partners.

This document defines the Ethics Hotline as the communication channel or tool for reporting those potential irregular events which may represent a breach of the principles laid out in the Code of Conduct.

Additionally, the Ethics Hotline provides one of the pillars of the Crime Compliance Program, implemented within the Group in order to communicate the behavior and events likely to be punishable by law.

# I. Scope of application

This standard defines the functioning and principles of the Ethics Hotline of the SENER Group. It will apply to all the communications sent from this tool by the individuals and entities that make up the Group, as well as third parties that send their communications or inquiries via the form available on the corporate website for this purpose.

# II. Purpose of the Ethics Hotline

The purpose of the Ethics Hotline is to put an easily accessible tool at the disposal of individuals and entities that comprise the SENER Group -and third parties that have a relationship with the Group- through which irregular events detected within the Group can be reported and communicated in a confidential and anonymous way.

Likewise, the Ethics Hotline will respond to all doubts and questions about the Code of Conduct and other Rules and/or Procedures of Grupo SENER companies in connection with the ethical culture of the company.

# III. Functioning of the Ethics Hotline

## III. I. Guiding principles

All communications, incidents, or questions submitted through the Ethics Hotline will be handled according to the following principles:

- **Independence:** actions taken in relation to communications received will be managed by the Corporate Compliance Body of the SENER Group, from this point forward, CCB, for the purpose of ensuring autonomy in its procedures and decisions. The actions taken by the CCB, will be only controlled by the Board of Directors of the SENER Group, through the Audit, Risk Supervision and Compliance Committee. In case of conflict of interest by any of the members of the CCB, the investigation will be undertaken by one of the members of the committee who is not prevented from carrying out the inquiry.
- **Objectivity:** it is guaranteed an exhaustive and complete analysis of the facts and circumstances reported through the Ethics Hotline, avoiding any type of arbitrary action, according to the protocol established for this purpose<sup>1</sup>. The resolution of all communications received should be always duly justified. In case any type of action is taken, it will be proposed by the CCB and approved by the Audit, Risk Supervision and Compliance Committee.

<sup>1</sup> Procedure Regulating the Ethics Hotline

- **Confidentiality:** activities shall be managed discreetly and confidentially, both in the investigation and analysis and in obtaining and handling the necessary information. If the user of the Ethics Hotline wishes, communications or consultations may be communicated anonymously.
- **Authority:** the SENER Group establishes the competence and authority of CCB to manage all the communications and consultations sent through the Ethics Hotline and to execute all the actions required in accordance with the Ethics Hotline Procedure.
- **Anti-retaliation policy:** in no case will retaliation be taken against people who make any type of communication or query through this channel.

## III. II. Communications and/or consultations to the Ethics Hotline

In the event of the occurrence of any of the circumstances that result in sending a communication or a consultation, these must be made through the form provided for this purpose entitled "Ethics Hotline" and found on Intr@SENER and on the corporate webpage.

The communication will be made, in any event, confidentially. In other words, the user may not share with anyone the filing of the communication or the making of an inquiry.

This must be submitted in as little time as possible from the occurrence of the events that are the subject of the communication or consultation or knowledge of them.

The user of the Ethics Hotline has the right to an efficient and timely handling of the communication, regardless of whether it is anonymous or not. All communications will be confidential, both in their content and in the findings resulting from them. In case it is not an anonymous communication, the user is entitled to being notified of the receipt of the communication and the final decision reached in regard to it.

The good faith of the user of the Ethics Hotline is presumed. For this reason, the information provided must be true. It should be kept in mind that this information will serve as the basis for the initiation of an internal investigation procedure that, in turn, could lead to other investigations by public bodies and the imposition of disciplinary sanctions or measures. It is worthwhile remembering that the dissemination of false or misleading information that could affect the good name and/or reputation of people, in certain jurisdictions, may be regarded as a crime. However, communications made in good faith and according to the above criteria will not under any circumstances have negative consequences.

## III. III. Recipients of communications made through the Ethics Hotline

All communications made through this Line will be received and analyzed, in the first instance and only, by the delegates of the Corporate Compliance Body of the Group for this purpose. After this preliminary analysis of the events, the appropriate actions and procedures will be set in motion in accordance with the established procedure.

Notwithstanding the above, SENER informs you that the data provided will be handled and, if necessary, transferred to interested third-parties, consultants or public authorities for the purpose of researching and clarifying the reported events, to determine responsibility, implement corrective actions and, when applicable, impose applicable legal and disciplinary actions before the responsible entities in each case.

# IV. Processing of the information

All communications will be handled with maximum rigor, analyzing and verifying the reported events firstly and then, proceeding to resolve them with the participation of the other areas or departments, if required, according to the protocol established for such purpose.

## IV. I. Ethics Hotline Personal Data Protection Clause

SENER Grupo de Ingeniería, S.A. as controller, will process the personal data provided for the management of the Ethics Hotline, based on the legitimate interest Sener Group has in knowing about and investigating the commission of legal breaches within its organization and the consent of the whistleblower, in case he/she has provided his/her personal data. The data will be shared with legal advisers and/or the competent authorities, where appropriate. Likewise, the information may be subject to international data transfers, since SENER Group operates worldwide, guaranteeing an adequate level of protection in these operations.

Learn more about the processing of your data and your rights by consulting our Ethics Hotline Data Protection Policy.

## IV. II. Ethics Hotline Personal Data Protection Policy

We take your privacy seriously and want you to understand our practices regarding the processing of your personal data. This privacy statement explains how we do it.

### Controller

SENER GRUPO DE INGENIERÍA, S.A., with tax identification number A-48914113, located at Calle Cervantes 8, Gexto (Las Arenas), 48930, Vizcaya, will process your personal data in order to effectively manage your participation in the Ethics Hotline and investigate the events you communicate.

Please be informed that SENER Group has a Data Protection Officer who can be contacted at any time at the email address [dpd@sener.es](mailto:dpd@sener.es).

### Purpose

The aim of the SENER Group Ethics Hotline management is to meet the following objectives:

- Process and investigate, confidentially, communications about alleged violations of applicable legislation, as well as SENER Group policies and internal regulations.
- Attend to and resolve questions and doubts concerning the Code of Conduct and other Rules and Procedures of SENER Group companies in connection with the ethical culture of the company.

The processing of your personal data for purposes other than the ones specified above will require your prior and express consent in each case.

### Legitimacy

Meeting the above purpose is based on the following:

- Legitimate interest that SENER Group has in knowing about and investigating the commission of legal breaches at its organization; however, in relation to communications in connection with money laundering and the financing of terrorism, the processing is based on a legal obligation.

- Legitimate interest that SENER Group has in investigating and adopting relevant measures in response to breaches of the policies and internal regulations of the company.
- Legitimate interest that SENER Group has in resolving doubts related to its policies and internal regulations, as well as spreading and sharing its compliance culture.
- The consent granted by the whistleblower to process his/her personal data, when he/she has decided to provide them.

### **Data to be processed**

The data to be processed will be your identifying and contact information, where these have been provided, and the data you communicate in connection with the people whose actions you report.

### **Data communication**

In case of indications of the commission of a crime or behavior that violates current law, SENER Group will communicate the data in connection with this behavior to legal advisers or the competent public authorities for their investigation, and where applicable, prosecution of these acts.

### **Data transfer outside the European Union**

Since SENER Group operates worldwide, your personal data will be accessible to/shared with other companies of the Group involved in this process. Any internal data transfer of the Group is governed and legitimized by the Binding Corporate Rules of SENER, guaranteeing an adequate level of data protection.

### **Data retention**

We will keep your data for 3 months on the platform that we use to receive communications, consultations, questions and concerns. At the end of this period, we will retain anonymized data, without the inclusion of any personal data.

### **Rights**

At any time, you may exercise the following rights:

- Right of Access: you may consult your personal data.
- Right of Rectification: you may change your personal data when they are inaccurate.
- Right of Erasure: you may request the erasure of your personal data associated with the service.
- Right of Opposition: you may request that your personal data not be processed:
- Right of Restriction of the processing: you may request the restriction of the processing of your personal data in the following cases:
  - While the challenge of the accuracy of your personal data is being verified.
  - When the processing is illegal, but you are opposed to the erasure of your personal data.
  - When SENER needs to process your data, but you need them for the exercise or defense of claims.-
  - When you have opposed the processing of your personal data for compliance with legitimate interest by SENER, while it is being verified whether the legitimate interests for the processing take precedence over your interests.
- Right of Withdrawal of consent: you will have the right to withdraw the consent granted for the processing of personal data, at any time, and through any of the channels indicated below, without this affecting the legality of the processing carried out prior to the withdrawal.

You may exercise these rights through the email [protecciondatos@sener.es](mailto:protecciondatos@sener.es) or through the mailing address indicated in the section "Controller", specifying which right you wish to exercise and providing copy of your national identification card or similar document verifying your identity.

In case you do not receive a satisfactory response to the exercising of your rights, please be informed that you can file a claim with the Spanish Data Protection Agency, through their [webpage](#).

### **Data security**

Grupo SENER is firmly committed to ensuring the security of the data that it processes and keeps. For this reason, we have adopted the technical and organizational measures needed to avoid the information being affected. Thus, once we have received your data, we will take the necessary security steps to avoid any unauthorized access, inappropriate uses or disclosures, unauthorized modifications, illegal destruction or accidental loss.

### **Contact us**

If you have a question or interest related to our practices concerning the use of personal data, don't hesitate to contact us by e-mail at: [protecciondatos@sener.es](mailto:protecciondatos@sener.es) or by post at the following address: Avda. Zugazarte, nº 56. 48930. Getxo, Las Arenas, Provincia de Vizcaya (Spain).



## **SENER IN THE WORLD**

[www.group.sener](http://www.group.sener)