

Whistleblowing Policy

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1. Introduction

- 1.1 Quibim is committed to taking the necessary actions to establish a proper whistleblowing process in the organization, in accordance with [Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the protection of persons who report breaches of Union law \("Whistleblowing Directive"\)](#), and [Law 2/2023 of 20 February 2023, regulating the protection of persons who report regulatory violations and the fight against corruption \("Whistleblowing Spanish Act"\)](#).
- 1.2 Whistleblowing encourages accountability and promotes responsible corporate behavior by providing a mechanism for people to report unethical or illegal practices. In alignment with the Whistleblowing Directive and the Whistleblowing Spanish Act, this Whistleblowing Policy (the "**Policy**") enables Quibim to foster a culture of upholding the law, transparency, integrity, and social responsibility that aligns with our broader goals of Sustainability.
- 1.3 Quibim has developed this Policy to demonstrate its commitment to open and accountable management and is designed to allow Quibim's employees and third parties to disclose information - confidentially, and if they wish anonymously - that they believe shows malpractice, unethical conduct, or illegal practices in the workplace, without being penalized in any way, protecting the Informant (as below defined) from any retaliation if they do report improper or illegal conduct within the organization.

2. Subjective Scope

This Policy applies to:

- a) all of Quibim's **employees** (either full-time, part-time or under a fixed-term contract) or **interns** (paid or unpaid), including persons whose work-based relationship is yet to begin where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations and including persons whose work-based relationship has ended;
- b) **self-employed** persons or freelance workers;
- c) **shareholders** and persons belonging to the administrative, management or supervisory body of Quibim;
- d) persons working under the supervision and direction of **contractors, subcontractors** or **suppliers** that have a professional relationship with Quibim; and

- e) other persons that, under the Whistleblowing Directive ¹ or the Whistleblowing Spanish Act², shall be protected when informing following the procedures established under this Policy.

Hereinafter, all individuals listed in sections a) to e) shall be referred to jointly as “**Informants**” or, individually, where required, as “**Informant**”.

3. Material Scope

This Policy and its processes shall be followed by the Informants to report **acts** or **omissions** that:

- may constitute an infringement of European Union law;
- may constitute a serious or grave criminal or administrative offense,
- may constitute a breach of Quibim’s processes, procedures or policies;
or
- any other action that may not be aligned with our corporate behaviors or values.

Examples of the conducts to report are³:

- a criminal offence;
- the breach of a legal obligation or regulatory requirement;
- a danger to the health and safety of any person;
- damage to the environment;
- bribery or fraud;
- unethical conduct;
- sexual harassment;
- intimidation or workplace harassment;
- harassment based on race or age; or
- the deliberate attempt to conceal any of the above.

Under this Policy, Informants shall qualify for protection provided that (i) they had reasonable grounds to believe that the information on breaches reported was true at the time of reporting and (ii) they reported internally following the procedures of this Policy.

¹ Article 4 of the Whistleblowing Directive establishes its personal scope.

² Article 3 of the Whistleblowing Spanish Act establishes its personal scope.

³ Please note this is not an exhaustive list and you are free to report other concerns.

This Policy is not designed to support an Informant who wishes to question financial or business decisions that Quibim has taken. Also, the Whistleblowing Channel is not the appropriate tool for making contractual or commercial claims, nor does it have the functionality of Customer Service to deal with customer requests. For all of this, we have other channels available depending on each person's needs.

4. Principles

The principles that govern this Policy are the following:

4.1 Confidentiality

Quibim will ensure the confidentiality of the identity of the Informants, ensuring it is kept from anyone beyond the authorized staff members⁴ competent to receive or follow up on reports without the explicit consent of the Informant. The confidentiality protection shall also apply to any other information from which the identity of the Informant may be directly or indirectly inferred and any third party mentioned in the report.

However, the identity of the Informant and any other information referred to in the paragraph above may be disclosed - only - where this is a necessary and proportionate obligation imposed by the laws of the European Union or national laws in the context of investigations by national authorities or judicial proceedings⁵.

Said disclosures shall be subject to appropriate safeguards. In particular, Informants shall be informed by Quibim (including an explanation in writing of the reasons for the disclosure of the confidential data concerned) before their identity is disclosed unless such information would jeopardize the related investigations or judicial proceedings.

4.2 Prohibition of Retaliation

Under this Policy, it is strictly prohibited any form of retaliation against Informants or any person who has been investigated as part of the disclosures, including threats of retaliation and attempts of retaliation⁶.

⁴ See section 5.6 to know who is authorized to access the reports.

⁵ As per Article 33 of the Whistleblowing Spanish Act it shall only be disclosed to the Judicial Authority, the Public Prosecutor's Office or the competent administrative authority within the framework of a criminal, disciplinary or sanctioning investigation.

⁶ Examples of retaliation: coercion, intimidation, harassment, discrimination, dismissal, demotion, transfer of duties, withholding of training, negative performance assessment, among other actions.

4.3 Protection of personal data

Any processing of personal data carried out pursuant to this Policy shall be carried out in accordance with Regulation (EU) 2016/679 (“**GDPR**”), applying the highest standards to the processing of personal data.

Personal data that are manifestly irrelevant for handling a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

4.4 Presumption of innocence

Quibim shall ensure that persons concerned fully enjoy the right to the presumption of innocence and the rights of defense, including the right to be heard and to access their files.

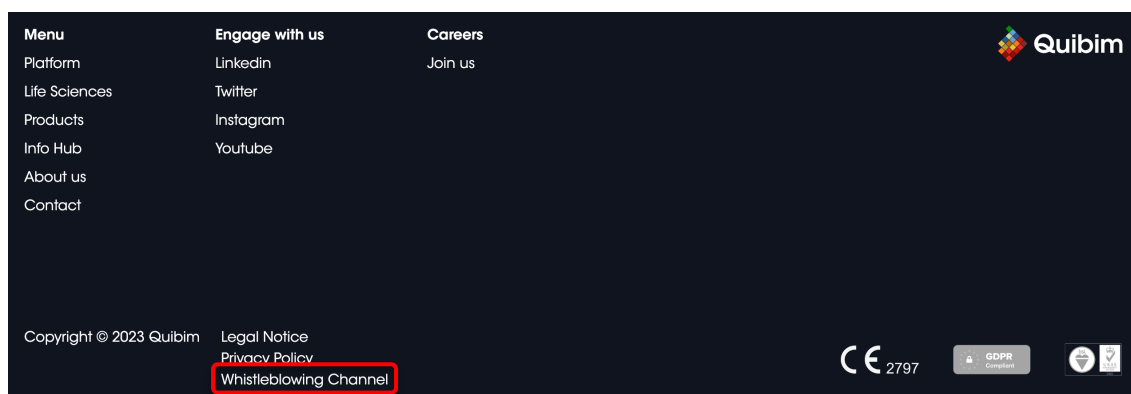
4.5 Good faith

If an Informant makes a genuine allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against them.

Only if the investigation reveals that the allegations were malicious, vexatious or pursued defamation of Quibim’s reputation or any of Quibim’s staff members or client’s reputation, disciplinary actions may be taken.

5. Whistleblowing Channel

5.1 If an Informant wishes to “*blow the whistle*”, they shall navigate to Quibim’s website (www.quibim.com), where they will find the “[Whistleblowing Channel](#)” link at the bottom of the homepage, as shown below:



Homepage of the Whistleblowing Channel:



 English

Anonymously report wrongdoing

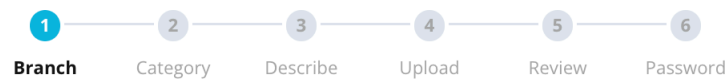
Raise concerns about wrongdoing you've witnessed at Quibim. You're in control of what you share. No one will know or be able to find out your identity unless you reveal it.

When reporting a case, you'll enter a description and can upload files. Within 7 days, someone at Quibim will confirm they've received your case. You'll get a response within 3 months. To see these updates, you'll need to use the unique case password you get after you submit the case.

Report a new case


Follow up on a case

5.2 The Informant will be required to select the relevant entity for which the case is about.



First, select the relevant branch

Select which part of Quibim your case concerns so it can be sent to the right team.

 You're reporting a case anonymously

Branch

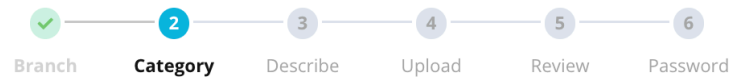
Select a branch 

Quibim Inc. (US)

Quibim Ltd. (UK)

Quibim, S.L. (Spain)

5.3 The Informant will be required to select the category that best describes their report.



What is the case about?

Select the category that best describes what you're reporting.

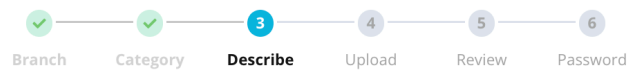
i You're reporting a case anonymously

Category (optional)

Unknown/Other ▼

Back **Next**

5.4 The Informant will be required to provide as much information as it is willing to provide. It would not be expected to have absolute proof of malpractice or illegal practices, but the Informant would need to show sound reasons for its concerns.



Describe what you've witnessed

Enter as much information as you're willing to provide. For example:

- What happened and who was involved
- Where and when it happened
- How this affected you personally

Avoid sharing anything that could reveal your identity, such as your name or contact details.

i You're reporting a case anonymously

Title

EXAMPLE

Description

EXAMPLE

Back **Next**

Uploading supporting files that provide context to the information described will be possible. For instance, documents, screenshots or photos.

5.5 A unique password will be generated after a case submission to ensure complete anonymity.



Case submitted, save password

Thank you for submitting your case. To see responses and updates, you'll need to go to the start page and enter your case password. You won't get any emails or notifications.

Scan the QR code, or copy or download the password, and save it somewhere safe.



Your unique case password

PASSWORD

Copy password

Download

Save this password now. You won't see it again.

When you can expect updates:

- Your case will be acknowledged within one week
- You will get a response within three months

Done

Informants can check for updates or communicate further anonymously by clicking "Follow up on a case" on the homepage of the Whistleblowing Channel.

Anonymously report wrongdoing

Raise concerns about wrongdoing you've witnessed at Quibim. You're in control of what you share. No one will know or be able to find out your identity unless you reveal it.

When reporting a case, you'll enter a description and can upload files. Within 7 days, someone at Quibim will confirm they've received your case. You'll get a response within 3 months. To see these updates, you'll need to use the unique case password you get after you submit the case.

Report a new case

Follow up on a case

- 5.6 Quibim's Chief People Officer – as the officer in charge of the correct functioning of the Whistleblowing Channel and implementation of this Policy - will send the Informant a receipt of acknowledgment of the case within seven (7) calendar days.
- 5.7 Quibim's Chief People Officer will process all cases it receives carefully and promptly, ensuring that they are investigated and providing the resources to ensure that they are resolved, preventing potential conflicts of interest.
- 5.8 The information will be made known only to those departments or persons whose cooperation is necessary for the investigation process to avoid compromising the result of the investigation, the Informant's good name, or any person affected by the case.
- 5.9 Quibim's Chief People Officer will decide whether sufficient information exists to investigate the allegation(s). Within thirty (30) calendar days from the receipt of acknowledgment, the Chief People Officer will inform the Informant about the investigation process or about not accepting to investigate further the raised concern.
- 5.10 Quibim will aim to keep the Informant who raised the concern informed of the progress of any investigation and its likely timescale. However, sometimes, the need for confidentiality may prevent Quibim from giving specific details of the investigation or any disciplinary action taken.
- 5.11 The maximum time limit for closing the investigation may not exceed three (3) months from receipt of the acknowledgment, except in cases of complexity requiring an extension of the time limit, in which case it may be extended for a maximum of three (3) additional months.
- 5.12 In case Quibim is not competent to investigate reported matters, it will be forwarded to competent authorities and/or other institutions. In case such actions were taken, the Informant will be informed by Quibim.

6. Other ways to report

- 6.1 The internal channel established herein shall also allow communications to be made in **writing** (by the Whistleblowing Channel or by mail⁷) or **verbally** (by telephone or voice messaging system⁸).

⁷ Addressed to the Chief People Officer, at Quibim's registered office: Avenida Aragón 30, floor 13, office I-J, 46021 Valencia (Spain).

⁸ At the following contact telephones: +34 961 243 225 | +34 648 086 619

- 6.2 At the request of the Informant, a report may also be submitted by means of a **face-to-face** meeting with Quibim's Chief People Officer within a maximum period of seven (7) calendar days.
- 6.3 Where appropriate, the Informants shall be warned that the communication will be recorded and shall be informed of the processing of their data in accordance with GDPR.
- 6.4 Verbal communications, including those made by face-to-face meeting, by telephone or by voice messaging system, shall be documented in one of the following ways, subject to the Informant's consent:
 - i. by a recording of the conversation in a secure, durable and accessible format, or
 - ii. through a complete and accurate transcription of the conversation by the personnel responsible for processing it.
- 6.5 Without prejudice to their rights under data protection regulations, the Informant shall be allowed to verify, rectify and agree to the conversation transcript by signing it.

7. Investigation outcome

- 7.1 Possible outcomes of the internal investigation may include:
 - i. **No further action** – given the information provided, the act or omission did not constitute a breach of Quibim's processes, procedures or policies, did not deviate from Quibim's corporate behaviors or values, or the information was insufficient to kick off an investigation.
 - ii. **Internal Investigation** – an internal investigation is kicked off to determine the misconduct and apply, if needed, appropriate disciplinary action.
- 7.2 As mentioned in Section 4.1, when reviewing each case, the designated Quibim staff shall decide whether the report should be referred to relevant national authorities.
- 7.3 While Quibim cannot always guarantee the outcome an Informant seeks, Quibim will try to deal with its concerns fairly and appropriately. However, suppose the Informant is unhappy about the outcome of an investigation. In that case, it should make a further report outlining its concerns. If there is

good reason to do so, mainly if there is new evidence, the concern will be investigated again.

- 7.4 The result of the investigations will be advised to the departments that need to take appropriate measures to mitigate or correct the transgression, in addition to the person being reported and the Informant.

8. External Channels

Any person may report to the **Independent Authority for the Protection of the Informant** or to the corresponding regional authorities or bodies any actions or omissions, either:

- i. directly; or
- ii. after communication through Quibim's internal channels as per this Policy.

9. Other provisions

This Policy is subject to review based on the prevailing circumstances, which may include changes in the applicable legislation, modifications in the internal processes, or updates to Quibim's systems.

As such, it is crucial to ensure that the content of this Policy remains aligned with the current standards and regulations. To guarantee the accuracy and applicability of the Policy, regular reviews must be conducted to identify any discrepancies and make the necessary changes, subject to the approval of the Board of Directors.

10. Enforcement

Disciplinary action may be taken against any of Quibim's employees found to have breached this Policy.

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