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# INTERNAL INFORMATION SYSTEM POLICY AND INFORMANT ADVOCACY

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Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
S.L.



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## 1. INTRODUCTION

AGROMILLORA prides itself on its compliance with applicable legislation and the ethical principles set out in its Code of Ethics and Conduct in relations with its stakeholders, and in all the activities it carries out.

To this end, a series of values have been established which constitute AGROMILLORA's culture. These generic rules govern the daily conduct of everybody in the AGROMILLORA Group. These ethical and performance principles are defined in the Code of Ethics and Conduct of AGROMILLORA GROUP (hereinafter referred to as "the Code").

AGROMILLORA has an Internal Information System to respond to any queries, discrepancies, or irregularities in compliance with the Code. The Internal information System also serves to monitor compliance with all applicable legislation, according to the procedures established in the Policy. This Internal Information System, which is established in compliance with Law 2/2023, of February 20, Regulating the Protection of Persons Reporting on Regulatory Violations and Anti-Corruption, is based on our sustainability objectives and aims to increase transparency within the AGROMILLORA Group.

### 1.1 Purpose

The purpose of the Internal Information System is to establish the necessary and appropriate mechanisms to enable the persons concerned to report any issues related to compliance with or interpretation of the Code, as well as violations of the law.

To this end, this Policy regulates the procedure for the management of Communications received, including the conduct of investigations and follow-up actions in connection with such Communications and their corresponding resolution. The Internal Information System is also configured as a mechanism to prevent irregular contingencies and conduct before they occur and to identify conflicts, thus generating an ethical culture within the organization. The Internal Information System should also identify gaps in the AGROMILLORA Group's risk map and identify any conflicts with stakeholders.

Finally, this Policy determines the guarantees for the protection of Informants.

### 1.2 Scope of application

The procedure established in this Policy is mandatory for all entities that belong to the AGROMILLORA group, regardless of their geographical location, and binds all its Members, regardless of their position and the function they perform.

Any person may use the Internal Information System in the situations envisaged for use in this Policy.

### 1.3 Principles of operation of the Internal Information System

AGROMILLORA guarantees, throughout the procedure of notification and management of Communications made through the Internal Information System the following principles:

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- **Independence and objectivity:** A thorough and complete analysis of the facts and circumstances that have been communicated through the Internal Information System will be guaranteed, avoiding any kind of arbitrariness or impartiality in the proceedings.
- **Protection of the identity of the Informant.** The identity of the Informant will not be communicated without their consent, guaranteeing the confidentiality of their identity and the confidentiality of their personal data, as well as that of the Communication received through the Internal Information System. All persons, who as a result of the investigation, must know its contents, are subject to a commitment of confidentiality.
- **Protection of the person(s) concerned:** The persons affected by the Communication shall have the right to be presumed innocent, the right to a defense and the right of access to the file, as well as the same protection afforded to the Informants, preserving their identity and guaranteeing the confidentiality of the facts and data of the proceedings.
- **Non-retaliation:** AGROMILLORA will not tolerate any form of reprisal directed against the Informant or those who collaborate in the investigation of the complaint.

The persons designated by the Head of the System as collaborators in the investigation process will exercise their functions under the principles of confidentiality, completeness, respect and dignity, applying the aforementioned principles throughout the procedure.

### 1.4 Regulatory framework

- **Law 2/2023**, of February 20, regulating the protection of persons reporting on regulatory and anti-corruption violations (*Law on the Protection of the Informant*).
- **(EU) Directive 2019/1937** of the European Parliament and of the Council of October 23, 2019 on the protection of persons reporting breaches of Union law.
- **Organic Law 5/2010** of June 22 amending Organic Law 10/1995 of December 23 of the Criminal Code.
- **General Data Protection Regulation (EU) 2016/679** of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.
- **Organic Law 3/2018**, of December 6, on Data Protection and Guarantee of Digital Rights (*LOPDGDD*).
- **Organic Law 7/2021** of May 26 on the protection of personal data processed for the purposes of prevention, detection, investigation and prosecution of criminal offences and the execution of criminal sanctions.
- **UNE 19601:2017. Penal Enforcement Management Systems.** A standard establishing the requirements for the implementation, maintenance and continuous improvement of a criminal compliance management system in organizations.

Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
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### 1.5 Definitions

This section provides definitions/explanations of all words or expressions used in this procedure, which may require clarification or expansion of content.

<i>Concept</i>	<i>Definition</i>
<b>AGROMILLORA or AGROMILLORA GROUP</b>	A group of companies or entities whose head company is NAMOZUL SPAIN, S.L.
<b>Channel</b>	Any means of communication defined in this Policy and described in section 2.2. of this Policy by which Communications may be sent.
<b>Code</b>	This refers to the Agromillora Code of Ethics and Conduct.
<b>Communication</b>	Notification of a potential violation of the Rules or request for information, sent through the Channels described in section 2.3 of this Policy.
<b>Board of Directors</b>	Board of Directors of NAMOZUL SPAIN, S.L.
<b>Ambassadors of the Code</b>	Person employed in any Subsidiary entrusted with maintaining a high awareness of ethics in that Subsidiary by training and guiding the employees.
<b>Subsidiary</b>	Any company belonging to the AGROMILLORA Group.
<b>Informant</b>	Person who makes an inquiry or reports an infringement through the Channel.
<b>Irregularity</b>	Allegedly unlawful act or omission related to acts or areas of action of the applicable regulations.
<b>Members</b>	Any employee, shareholder, director or person commercially linked to AGROMILLORA Group.
<b>Standards</b>	A set of rules that apply to the Group, whether internal (procedures, protocols or instructions) or external (regulations and legislation of European, state, regional or local origin).
<b>Person concerned</b>	The person identified in the Communication as responsible for the alleged commission of an irregularity or unlawful act.
<b>System Manager</b>	Collegiate body responsible for the Internal Information System, whose role is described in section 2.4 of this Policy.
<b>Internal Information System (IIS)</b>	The preferred channel for reporting actions or omissions provided for in the article 2 of Law 2/2023 on the Protection of the Informant.

Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
S.L.



## **2. OPERATION OF THE INTERNAL INFORMATION SYSTEM**

### **2.1 Object of Communication**

Through the Internal Information System the Informant can perform the following actions:

- a) Report on possible conduct that is contrary to the provisions of the Code or submit queries regarding the Code itself.
- b) Report on actions or omissions that may constitute serious or very serious criminal or administrative offences, including, but not limited to:
  - financial losses to the treasury or social security,
  - embezzlement, theft, bribery, money laundering, or
  - conduct contrary to competition law.
- c) Report any action or omission that may constitute a violation of European Union law and Standards.
- d) Report on violations of labor law in the field of safety and health at work, without prejudice to the provisions of its specific regulations.
- e) Report on situations of both physical and verbal harassment, whether of a work, sexual or gender-based nature.

Queries, suggestions, complaints and/or opinions about an employee's employment status may not be the subject of a Communication, unless it involves a violation of the Standards. Complaints of a purely commercial nature may not be communicated either.

### **2.2 Who can submit a Communication through the Channel?**

Internal information channels are open media. Accordingly, the following persons may submit Communications through the Channel:

- Employees
- Former employees
- Family members of employees
- Shareholders
- Members of the Board
- Customers
- Suppliers
- Commercial agents and distributors
- Other collaborators

### **2.3 Internal information channels**

Agromillora provides a number of internal information channels to informants:

- 2.3.1 Emails
- 2.3.2 Ethical Mailbox
- 2.3.3 Telephone information line

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- 2.3.4 Web form
- 2.3.5 Mailing address

The Informant may use any of these means (the Channels) to send a Communication or request a face-to-face meeting with the System Manager.

The Informant may choose to submit the Communication anonymously or by providing personal data.

### 2.3.1 Emails

Communications may be made by means of emails intended for this purpose:

- The email address for reporting **conduct contrary to the Code or violations of the law** is: [complaints@agromillora.com](mailto:complaints@agromillora.com)
- The email address for legal **queries** or clarifications of the Code is the following: [inquiries@agromillora.com](mailto:inquiries@agromillora.com)

### 2.3.2 Ethical Mailbox

In the communal areas of its workplaces, Agromillora has installed physical mailboxes called “Ethical Mailbox”, intended for anyone who wishes to submit a Communication according to the cases detailed in point 2.1.

The Code Ambassadors will be responsible for regularly reviewing the contents of mailboxes and redirecting notifications to the System Manager.

### 2.3.3 Telephone information line

A telephone line is provided (+34 628 04 79 35), which will be attended directly by the System Manager. The Informant will be able to speak directly to the System Manager or leave a message in the voicemail.

### 2.3.4 Web form

In order to ensure that the Informants can submit their Communications in an easy and secure manner, the submission of inquiries or infringement information is facilitated through a form that can be accessed on the Agromillora website via the following link:

<https://www.agromillora.com/commitment/>

<https://www.agromillora.com/en-us/commitment/>

<https://www.agromillora.com/tr/taahhudumuz/>

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To send Communications through the Agromillora website, a Communication form is made available to the Informant. This form will be automatically forwarded to the System Manager, without any intermediary in this operation, so Agromillora guarantees the confidentiality of the content in Communications sent by these means.

The Informant can consult the Code of Ethics and this Policy of the Internal Information System in the same link.

### 2.3.5 Postal address

Communications may also be sent to the following postal address:

AGROMILLORA CATALANA S.A.U.  
[Internal Information System Manager](#)  
Plaça Manel Raventós, 3-5  
08770 – Sant Sadurní d’Anoia (Barcelona) - Spain

## 2.4 Internal Information System Manager

The competent body shall designate a director of the AGROMILLORA Group as the natural person responsible for the Internal Information System (hereinafter "System Manager"). If the Head of the System is a collegiate body, the latter shall delegate to one of its members the powers of management of the Internal Information System and processing of investigative files, who must be a director of the entity, and will exercise the position independently of the administrative body.

The System Manager shall perform his/her duties, as set out in this Policy, for the entire Group.

The Head of the System will carry out his/her duties independently and autonomously from the other organs of Agromillora. They may not receive instructions of any kind in their exercise, and shall have all the personal and material means necessary to carry them out.

The appointment of the Head of the System must be notified to the competent authorities in accordance with the provisions of the Law on the Protection of Informants.

## 2.5 Role of Ambassadors to the Code of Ethics and Conduct

The Subsidiary Code Ambassador is the person appointed in each Subsidiary to provide information to the Subsidiary staff on the use of the Internal Information System, as well as the essential principles of the Procedure detailed in the following sections.

## 3. PROCEDURE FOR THE MANAGEMENT OF COMMUNICATIONS NOTIFIED THROUGH INTERNAL INFORMATION CHANNELS

### 3.1 Commencement of the communication process

The Communication process begins when the Informant:

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- a. Communicates through any Channel that they are aware of or suspect the commission of illegal, unlawful or criminal behavior as described in paragraph 2.1 above; or
- b. when they make an enquiry of a legal nature or seek clarification on the Code.

### 3.2 Receipt of Communication

Upon receipt of the Communication, the System Manager will review whether the Communication meets the following requirements:

- a. A clear and concrete description of the events reported.
- b. Indication of the Subsidiary or country in which the alleged irregularity or unlawful act was committed.
- c. The relationship between the informant and Agromillora.
- d. An email address or telephone number for the Informant to send a reply or request additional information, except in cases where the Communication has been submitted anonymously.

Communications may be processed anonymously.

### 3.3 Admission of the communication and opening of proceedings

Upon verification of compliance with these minimum requirements set forth in the preceding paragraph, the System Manager will record the Communication and send an acknowledgement to the Informant, no later than seven (7) calendar days after the Communication is made, unless the Informant has expressly waived receiving communications regarding the investigation or it is reasonably considered that the acknowledgement of receipt of the Communication would compromise the protection of the identity of the Informant. The acknowledgement of receipt will simply record receipt of the communication but will not involve an analysis of the substantive issues, which will be carried out at a later stage.

Ambassadors must forward Communications received on the Channels enabled in the Subsidiaries to the System Manager within a maximum of 5 calendar days from the receipt of the Communication.

After a preliminary analysis, the Head of the System will evaluate the Communication submitted, and within 30 calendar days of receipt of the Communication must archive it or begin the investigation process.

The Communication may be archived in the following cases:

- a. Where the reason for anonymity of the Communication makes it difficult or impossible to investigate the incident,
- b. Because of the vagueness of the facts described or alleged,
- c. Because of the lack of clarity about the wrongfulness of the conduct.

The Informant, in any case, will receive a Communication about the admission or rejection of the Communication. The latter should be accompanied by a reasoned justification explaining why it was rejected, except in cases where the Informant had not communicated a notification address.

Should an investigation be initiated, a maximum period shall be fixed for responding to the investigation proceedings, which may not exceed three months from the receipt of the Communication or, if an acknowledgement of receipt was not sent to the Informant, three months from the expiry of the period of seven calendar days after the Communication was made. However, in cases of particular complexity the period may be extended by an additional three months.

Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
S.L.



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### 3.4 Instruction. Investigation process

The investigation shall include all actions aimed at verifying the plausibility of the facts reported. The System Manager will act as an instructor and must act impartially. Alternatively, in the investigation of particularly complex or sensitive cases because of the risks involved, a collegiate body may be appointed to investigate.

Where it is considered that the information provided in the Communication is not clear or complete, more information will be requested from the Informant. If there remains insufficient material to begin an investigation, or it is not possible to request an extension or more information because it is an anonymous communication, the opening of the investigation into the allegations cannot be guaranteed. If, within 15 calendar days from the date of the request for additional information, the requested documentation is not provided, the System Manager may archive the file by reasoned decision.

The Person Affected by the Communication shall be made aware of this, as well as of the allegations contained in the Communication. In addition, they will be informed of their right to submit written representations and about the processing of their personal data. However, information on this right may be provided in the course of the hearing if it is considered that its prior provision could facilitate the concealment, destruction or alteration of evidence.

Where the information provided in the Communication is considered sufficient, the pre-trial investigation process shall be opened. The Head of the System will prepare a reasoned report, for which they can obtain all the information and documentation they deem necessary and can also request the collaboration anyone who can provide information on the events. This reasoned report will be notified to the Affected Person so that they can present their representations. The investigation process may require the collaboration of a department or person who may have knowledge of the events reported, refraining from giving evidence whenever there may be a conflict of interest and ensuring confidentiality at all times. All Members of the Group shall be obliged to cooperate fairly in the investigation.

The Affected Person may request clarification at any time and shall have a period of 30 calendar days within which to make such representations as they consider appropriate. The representation shall be made in writing.

The affected subjects will not be told the identity of the Informant or given access to the Communication.

In order to guarantee the right of defense of the Affected Person, they will have access to the file, ensuring that no information that could identify the Reporting Person is disclosed, and can be heard at any time.

Without prejudice to the right of the Affected Person to make written representations, the investigation shall, whenever possible, include an interview with the Affected Person in which they are invited to set out their version of events and to provide such evidence as they consider appropriate and relevant to their defense. The presumption of innocence shall always be respected.

All AGROMILLORA Group Members shall cooperate and shall be obliged to comply with the requirements addressed to them to provide documentation, data or any information related to the investigative procedures being processed, including any personal data requested.

### 3.5 Resolution of the file

The investigation phase of the Communication will conclude with the preparation of a final report containing details of the events reported and the investigations carried out to clarify the alleged irregularity and possible response actions.

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This report will be written by the System Manager. It shall contain at least the following information:

- Date of receipt
- Identification code
- Reason for communication and summary of established facts
- Activities carried out
- Summary of the allegations of the Person concerned
- Action to be taken
- Closing date

Upon issuance of the final report, one of the following decisions shall be taken:

- Archiving of the file, which shall be notified to the Informant and, where applicable, to the Person concerned.
- Transfer to the Public Prosecutor's Office or competent authority should the acts be considered to constitute an offence.
- Adoption of agreement to initiate a sanction procedure, if applicable.
- Corrective action, if applicable.

Whatever the decision, it will be communicated to the Informant, unless they have waived this right or the Communication is anonymous.

### 3.6 Completion of the process

The final report will be archived and kept by the System Manager.

The System Manager shall keep a record of the communications received and internal investigations. This record will not be made public.

### 3.7 Follow-up to Communications

In cases where the reported events have been considered to constitute a disciplinary violation or contrary to the Code or the internal regulations of AGROMILLORA, the System Manager must inform the Corporate Compliance Department of the implementation of corrective, preventive and follow-up controls to prevent the recurrence of a similar case.

The System Manager shall send the Audit Committee an annual report detailing the number of communications received and indicating the action taken.

## 4. OBLIGATIONS AND RESPONSIBILITIES

Anyone who becomes aware of a possible breach of the AGROMILLORA Code and Standards is obliged to report it through the means available for this purpose. Not only those who violate the Code or Standards, but also those who condone such behavior and/or are aware of such behavior and do not seek to remedy or report it immediately, shall be deemed to have behaved inappropriately.

Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
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Communications will always be made under criteria of veracity, clarity and completeness. Knowingly making false allegations could lead to criminal or civil liability under current legislation, as well as possible disciplinary measures.

The Informant has the responsibility to provide all the evidence or indications that may be available to them at the initial moment of the Communication.

Any Member that, who by virtue of their function, may be required to collect information during the processing of a file in accordance with this Procedure, is obliged to collaborate proactively with the investigation and keep the matter confidential.

### 5. PROCEDURAL GUARANTEES

In order for the effective use to be made of the Information System Channels, a series of guarantees are in place to ensure that both the Informant and any potential offender can be protected.

Informant protection measures shall also apply, where applicable, to:

- a) natural persons who, within the framework of the organization in which the Informant provides services, assist the Informant in the process,
- b) natural persons who are related to the Informant and who may suffer reprisals, such as co-workers or family members of the Informant, and
- c) legal persons, for whom they work or with whom they have any other employment relationship or in which they have a significant involvement. For these purposes, it is understood that holding a shares or voting rights is understood to be significant when it enables the person who holds them to have the capacity to influence the legal entity involved.

Regardless of the outcome of the investigation, the Informant will receive communication of the resolution of the procedure, whether disciplinary measures are imposed or the file is archived. Likewise, the Informant will be informed of the inadmissibility of the complaint and the reasons for it.

#### 5.1 Rights of the Informant

##### 5.1.1 Confidentiality

The System Manager, in charge of receiving and managing Communications, must ensure the confidentiality of the content of the Communication. This guarantees that in any communication made in good faith the identity of the Informant will not be disclosed. Only persons strictly necessary to carry out the relevant investigation shall be aware of their identity, avoiding both direct identification and reference. The obligation of confidentiality extends even after the completion of the investigation process.

Communications and all documentation related to the processing thereof will be retained for the maximum period of limitation of the crime or administrative misdemeanor in accordance with applicable law. In cases where the facts covered by the communication do not constitute an administrative offence or misdemeanor, the documentation shall be kept for a maximum period of 5 years from the date of resolution of the file.

Without prejudice to the foregoing, the data of the collaborators making the Communication may be provided to the administrative or judicial authorities, if they are required as a result of any procedure derived from the subject matter of the Communication.

Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
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### 5.1.2 Measures to protect against reprisals

The Informant is guaranteed that they will not suffer reprisals, direct or indirect, as a result of making the Communication in good faith. If this guarantee is violated, it must be reported, the facts will be investigated and, if it is confirmed that reprisals are being used, disciplinary measures may be taken.

Reprisals means any act or omission that is prohibited by law, or that, directly or indirectly, involves unfavorable treatment that places the victim at a particular disadvantage compared to others in an employment or professional context, solely because of their status as an Informant, or because they have made a public disclosure.

This guarantee also extends to all persons who have professional or employment links with the Informant, those who have already completed their professional relationship, volunteers, trainees, persons participating in selection processes, and anyone in the Informant's work or personal environment who may suffer reprisals, as well as legal entities owned by the Informant.

Likewise, the protection measures for the informant shall apply, where appropriate, specifically to the legal representatives of the employees of the company in the exercise of their functions of advice and support to the informant.

## 5.2 Rights for the Affected Person

### 5.2.1 Right to defense and contradiction

Upon receipt of the Communication and its processing, the Affected Person shall be informed of the initiation of the procedure and its purpose. However, the Communication of initiation may be delayed where necessary to ensure the successful completion of the investigation.

Once the initiation of the investigation process has been communicated, the Affected Person shall have the right to provide all evidence that they consider relevant for their defense. They will also have access to any evidence that may have been collected, with the exception of the identity of the Informant.

During the course of the investigation the Person Concerned shall have the right to make any representations that they consider appropriate for their defense.

### 5.2.2 Presumption of innocence

During the investigation process and until the issuance of a decision, the presumption of innocence of the Person Concerned is guaranteed, so that no restrictive or corrective measures may be taken against the offender. Evidence-keeping measures may be imposed only when strictly necessary.

### 5.2.3 Reasoned resolution

Upon completion of the investigation, the resolution of the proceedings shall be communicated to the Person Concerned by a written reasoned decision.

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Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
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### 5.2.4 Confidentiality and impartiality of the investigation process

Confidentiality of the facts and the investigation process is guaranteed. Any leaks during the process will be duly investigated.

Proceedings shall be conducted by ensuring impartiality.

## 6. PROTECTION OF PERSONAL DATA

The System Manager will treat personal data received through the Channel confidentially and in accordance with the purposes set out in this Policy.

The processing of personal data arising from the application of the procedure described in this policy shall be governed by the provisions of the Organic Law on Data Protection and Guarantee of Digital Rights (LOPDGDD), of 6 December 2018 and (EU) Regulation 2016/679 of the European Parliament and Council, of 27 April 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

The System Manager, as well as any Member involved in an investigation process, will treat personal data with absolute confidentiality at all times and maintain the required duty of secrecy regarding the same, in accordance with the provisions of the implementing regulations, adopting for this purpose the necessary technical and organizational measures that guarantee data security and prevent their alteration, loss, unauthorized access or processing, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed.

Reporting parties must ensure that the personal data provided is true, accurate, complete and up-to-date. Data processed as part of an investigation will be deleted as soon as the investigation is complete, unless administrative or judicial procedures arise from the measures adopted. Likewise, the System Manager will keep the aforementioned data duly blocked for the periods during which responsibilities could arise from the actions carried out as a result of them.

Without prejudice to the foregoing, the personal data contained in the Communications may be provided both to administrative or judicial authorities, insofar as they are required as a result of any proceedings arising from the subject matter of the Communication, and to persons strictly necessary in any subsequent investigation or judicial proceeding initiated as a result of the investigation.

Personal data will be processed in accordance with Title VI of Law 2/2023 on the Protection of the Informant.

Personal data subject to processing may be retained in the information system only for the time necessary to decide whether to initiate an investigation into the facts reported. If after three months from the receipt of the communication, no investigation proceedings have been initiated, they should be deleted, unless the purpose of the preservation is to leave evidence of the functioning of the system.

Communications that have not been acted upon may only be recorded anonymously.

Prepared by: Corporate Risk Manager	Reviewed by: Corporate Legal Director	Approved by: Board of Directors of Namozul Spain, S.L.
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## INTERNAL INFORMATION SYSTEM POLICY AND ADVOCACY

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### **7. INTERNAL REFERENCE DOCUMENTS**

- Code of Ethics and Conduct of the Agromillora Group.
- Code of Ethics and Supplier Conduct
- Agromillora Compliance Policy.
- Agromillora Disciplinary System.

### **8. APPROVAL OF THIS DOCUMENT**

This Policy is approved by the Board of Directors of NAMOZUL SPAIN, S.L. on the date indicated in the heading. This approval is formalized after informing the representatives of the workers of Agromillora Iberia, S.L.U. of its contents and having obtained their approval.

### **9. DISSEMINATION, ENTRY INTO FORCE AND REVISION**

AGROMILLORA will carry out the necessary actions to ensure the knowledge and application of this policy to all subject persons. The Code Ambassadors in each Subsidiary shall be responsible for communicating the existence of the Internal Information System to all Members of the organization, its operation and the objectives pursued.

This Policy will become effective as of its approval and will be binding from that moment.

This policy will be subject to regular and extraordinary revisions and updates whenever there are variations in AGROMILLORA's strategic objectives or applicable legislation. Substantial changes to this policy will be approved by the Management Committee of AGROMILLORA CATALANA S.A.U.

Prepared by:  
Corporate Risk Manager

Reviewed by:  
Corporate Legal Director

Approved by:  
Board of Directors of Namozul Spain,  
S.L.