

**FCC GROUP INTERNAL
REPORTING
SYSTEM
POLICY**

14 June 2023

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0. Version control

Version	Date	Changes
1	14 June 2023	Initial version. Approved by the Board of Directors.

1. Reason

Article 5.2(h) of the Spanish Whistleblower Protection Act (Law 2/2023 of 20 February) states that every regulated entity must have a policy or strategy which sets out the general principles of its internal whistleblowing and whistleblower protection system, duly disseminated throughout the entity or organisation.

2. Purpose

In accordance with the aforementioned article 5.2(h) of Law 2/2023 of 20 February, the FCC Board of Directors has drawn up the FCC Group Internal Reporting System Policy (hereinafter referred to as "the System"), with a view to setting out the general principles therein.

The System falls within the FCC Group Compliance Model devised by its Board of Directors and comprises the provisions on this matter set out in the FCC Group Code of Ethics and Conduct, Crime Prevention Manual and the respective Procedures of the Whistleblowing Channel and Investigation and Response and Investigation Channel.

3. General principles

This Policy sets out the following principles governing the System:

1. Protection is established for whistleblowers, expressly prohibiting any retaliation against them, understood as any acts or omissions that, directly or indirectly, entail unfavourable treatment that places the persons who suffer them at a particular disadvantage with respect to another person in the work or professional context, solely because of their status as whistleblowers or because they have made a public disclosure.
2. The System facilitates communications via the FCC Group's Whistleblowing Channel of breaches of its Code of Ethics and Conduct and the infringements referred to in article 2 of Law 2/23.
3. The System has been designed and is securely managed to guarantee the confidentiality of the identity of the whistleblower, third parties mentioned in the communication, and actions and alleged facts, thus safeguarding the principles of data protection and preventing unauthorised access.
4. The System accepts written and oral submissions to the System Officer, which may be made anonymously or through a named individual.
5. The FCC Group has its own procedure, integrated within the FCC Compliance Model, to effectively manage all submitted communications.
6. The protection of personal data collected and processed through this System is

guaranteed in accordance with the pertinent Spanish legislation currently in force.

4. System Officer

The FCC Board of Directors appoints the corporate Compliance Officer as the System Officer.

The Board of Directors is responsible for his/her dismissal or removal from office.

This appointment shall be communicated to the Independent Administrative Authority referred to in Law 2/23.

The System Officer shall carry out his or her functions independently and autonomously from the rest of the organisation's bodies, without receiving instructions in the performance of his or her duties, and shall have the necessary material and personal resources for the fulfilment of his or her functions.

5. Disclosure and public dissemination

This Policy will be published on FCC's corporate website and made available to all employees together with the System management procedure.

In keeping with Law 2/2023, the organisation shall set up a direct access to the Whistleblowing Channel on its homepage (www.fcc.es) in a separate and easily identifiable section.

FCC shall appropriately disseminate this Policy and the System within its organisation.