

## Essential Management Procedures for the Ethical Channel

### Introduction:

At Sistemas Industriales Navales, we recognize the importance of maintaining high ethical standards and promoting a safe and transparent working environment. To strengthen our culture of integrity, we have established this Whistleblowing Channel, serving as a crucial resource for reporting any concerns related to unethical practices, inappropriate conduct, or irregularities. This document outlines the essential management procedures of the Whistleblowing Channel, ensuring effective and confidential implementation.

### Purpose of the Whistleblowing Channel:

The main objective of Sistemas Industriales Navales's Whistleblowing Channel is to provide our employees, clients, suppliers, and other stakeholders with a secure and confidential means to report any ethical concerns or irregularities. The effective implementation of this channel will contribute to maintaining the integrity of our operations and will strengthen trust in our company.

### How to Submit a Complaint:

#### 1. Confidential Channel:

Complaints can be submitted confidentially and anonymously if the complainant wishes.

A secure online form is available at [www.sintemar.com/canal-etico](http://www.sintemar.com/canal-etico) to facilitate the submission process.

#### 2. Email:

Complaints can also be sent by email to [canaletico@zubicar.es](mailto:canaletico@zubicar.es)

It is recommended not to include identifying information in the email subject to preserve confidentiality.

#### 3. Postal Code:

Complaints can also be sent to the following postal address:  
Ribera de Axpe, 50 – 5th Floor – 48950 Erandio (Vizcaya).

### Reception and Registration of Complaints:

#### 1. Designated Responsible:

The Internal Manager of the Whistleblowing Channel is the person designated to receive and manage the complaints.

[canaletico@zubicar.es](mailto:canaletico@zubicar.es) is available for inquiries and clarifications.

#### 2. Registration of Complaints:

Each received complaint will be recorded in a secure system accessible only to designated personnel.

A unique reference number will be assigned to each complaint for tracking.

## **Investigation and Resolution:**

### **1. Investigation Team:**

A specialized team will be designated to conduct impartial investigations. This team will have the capability to summon interviews and gather relevant evidence.

### **2. Confidentiality:**

Confidentiality will be ensured throughout the investigation process. Measures will be implemented to protect whistleblowers from unfair retaliation.

### **3. Report and Corrective Actions:**

Upon concluding the investigation, a detailed report including findings and recommendations will be generated. Appropriate corrective measures will be taken to address any identified issues.

## **Communication and Follow-up:**

### **1. Communication with the Complainant:**

Feedback will be provided to the complainant on the outcome of the investigation, as far as it does not compromise confidentiality.

### **2. Annual Report:**

An annual report summarizing received complaints, actions taken, and preventative measures implemented will be prepared.

### **3. Conclusions:**

These essential procedures are fundamental to ensuring the effectiveness and confidentiality of our Whistleblowing Channel at Sistemas Industriales Navales. By adhering to these guidelines, we reaffirm our commitment to ethics and transparency, building a stronger and more reliable company.