

WHISTLEBLOWING CHANNEL POLICY

Sistemas de Misiles de España S.L. (hereinafter, **"SMS**") has a Whistleblowing Channel, designed and implemented in accordance with the requirements of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

The Whistleblowing Channel is enabled to **securely** report the actions or omissions provided for in article 2 of the aforementioned Law, via the e-mail address <u>canaldenuncias@sms-defensa.es</u>.

SMS assumes the commitment to **protect the persons who make these communications**, ensuring, at all times, **diligent processing** of the communications and respect for the following **guarantees**:

- **Confidentiality** of all the people involved in the communication, as well as all the actions carried out in its processing.
- The possibility of making the communication **anonymously**.
- Absence of reprisals against persons who communicate in good faith.
- Processing of **personal data** in accordance with current legislation.
- **Right to the presumption of innocence and defense** of the person affected by the communication.

SMS' Internal Information System, available at <u>www.sms-defensa.es</u>, consists of the following **elements**:

- Whistleblowing Channel Policy.
- Whistleblowing Channel Management Procedure.
- Whistleblowing Channel Manager.
- Whisthleblowing Channel, as preferential channel to send communications.
- **External channel** of communication to the Independent Authority for the Whistleblower Protection (*Autoridad Independiente de Protección al Informante, A.A.I.*).

Failure to comply with any internal rules is a punishable offence. Therefore, failure to comply with policies or procedures implemented in relation to the Whistleblowing Channel may be subject to reasonable and proportionate disciplinary measures.

Approved by the Board of Directors of SISTEMAS DE MISILES DE ESPAÑA, S.L., on 22/03/2024, upon proposal of the Compliance Officer.