



Speak-Up Channel Protocol

Rule 42

Track changes

Revision	Date	Section involved	Issued	Reviewed	Approved
1	July 21, 2020	All	External	Legal	Raúl Morales

Rule 42 - Speak-Up Channel Protocol

With the aim to comply with Spain's criminal proceedings, this Protocol on the specific speak-up channel for SOLTEC POWER HOLDINGS S.A. and SOLTEC ENERGÍAS RENOVABLES, S.L. (hereinafter, the Group) is regulated in compliance with Spain's Criminal Code.

1.1 With regards to the obligation to report non-compliances relating to Corporate Compliance and Tax Compliance

1.1.1 In accordance with the Code of Conduct, it is everyone's obligation (regardless of their position and category) to inform the compliance body about **sound suspicions or knowledge of alleged violations of the Code of Conduct, or of any other general or specific protocol applied by the company following implementation of Corporate Compliance and Tax Compliance (that is, two programs aimed at preventing crime).**

1.1.2 The obligation to inform about non-compliances in the areas of Corporate Compliance and Tax Compliance is paramount for effectively developing existing policies to prevent, and where appropriate detect and correct, possible irregular behaviors.

1.1.3 Thus, potential breaches of this obligation may lead to initiation of the corresponding disciplinary proceedings and, where applicable, to the application of sanctions.

1.2 Mechanism to report irregularities

1.2.1 Violations (those mentioned in the previous section) should be reported by email to canaldenuncia@soltec.com, an address specifically created for this purpose (managed exclusively by the compliance body). Solnet includes a section containing all the necessary information about the speak-up channel.

1.2.2 It is also possible to contact the compliance body directly and make your complaint. In such cases, it is required that: i) the compliance body puts down in writing the data of the complainant, date of the complaint, a summary of allegations as well as of proofs or information provided, ii) after reading and agreeing with it, the complainant should sign the document in proof of consent.

1.2.3 In both cases (whether the option in section 1.2.1 or 1.2.2 is used), it is necessary to include: (i) complainant identification; (ii) a description of alleged facts (mentioning the individual(s) involved); and (iii) a reference to available or potentially available proofs or information on these facts.

1.2.4 As a general rule, no report or complaint failing to comply with the requirements included in the previous sections will be processed. Similarly, the compliance body will immediately file complaints or reports manifestly unfounded. Questions falling outside the competence of the compliance body will be referred to the corresponding organization or unit.

1.2.5 A channel is also established for Group members to make inquiries relating to the Corporate Compliance program (consultascompliance@soltec.com).

1.3 Confidentiality and protection against retaliation

1.3.1 As a general principle, the Group guarantees the confidentiality of the complainant's identity and will take legal measures to protect the privacy and other rights of affected parties during the investigation.

1.3.2 Without limiting the foregoing, the Group may exceptionally submit or disseminate such information to the authorities or to the judge or court when legally required.

1.3.3 In accordance with the Code of Conduct, the Group commits to protecting the rights of individuals who raise their concerns in good faith, not retaliating against them. In fact, retaliation against individuals who raise their concerns in good faith is a violation of the Code of Conduct and could be contested.

1.4 Procedure

1.4.1 In the case of complaints made in line with the abovementioned, as well as in relation to investigations potentially carried out *ex officio*, the compliance body is responsible for processing them, without prejudice to its right to request the collaboration of all personnel (who are obliged to collaborate) and even of an external legal counsel.

1.4.2 This procedure is regulated as Rule 44 of the Compliance Program, under the name "Procedure for Investigation, Management and Response to a complaint".