

# INTERNAL INFORMATION SYSTEM POLICY

The purpose of this Policy is to set out the principles, strategy and characteristics of the Internal Reporting System of Würth Industry Spain

The Policy is applicable to any natural or legal person who has a relationship with Würth Industry Spain and reports a breach or irregularity, unlawful or criminal act, as well as any actions or omissions that may constitute breaches of European Union law, as referred to in Law 2/2023. Therefore, applicable to its partners, employees, managers, shareholders, volunteers, persons with an employment or statutory relationship that has already ended, persons whose employment relationship has not yet begun (candidates), clients, suppliers or collaborators, as well as all persons indicated in the aforementioned Law.

The principles of the Internal Information System implemented by Würth Industry Spain are as follows:

- Presumption of innocence.
- Contradiction.
- Confidentiality.
- Possibility of anonymous reporting.
- No reprisals against the Whistleblower, including the conduct described in article 36 of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.
- Right to information for interested parties.

The Internal Reporting System guarantees the confidentiality of the identity of the Reporter, the Reported Person and the third parties to which the communications relate. Furthermore, it is guaranteed that there will be no retaliation or negative consequences against the reporter for the fact of the communication, unless the internal investigation determines that the communication has been made with knowledge of its falsity or that it has been made with reckless disregard for the truth, bad faith or abuse of rights.

Würth Industry Spain has appointed a person responsible for the Internal Reporting System, who will be the person in charge of managing the communications received. In order to avoid possible conflicts of interest, any communication received about the person responsible for the system will be assigned to a responsible third party.

Informants can send a communication through one of the following means that Würth Industria makes available to them:

- Würth Industria website
- Compliance Channel Würth Industria España SA
- Würth Group Compliance Channel - Speak Up
- 938.602.110
- Postal address: Carrer dels Joiers, 21, 08184, Palau-solità i Plegamans  
Barcelona
- By requesting a meeting with the person in charge of the Internal Information System.

Additionally, the informant can access the external information channels with the competent authorities and, where appropriate, with the institutions, bodies, organs or agencies of the European Union.

#### **ANALYSIS AND INVESTIGATION OF THE COMMUNICATION.**

All communications will be managed and those that are admitted for processing will be investigated. In any case, if deemed necessary, the sanctioning or precautionary measures deemed appropriate in each case will be taken.

The Internal Information System of Würth Industry Spain complies with Organic Law 3/2018 on Data Protection and Guarantee of Digital Rights and with the General Data Protection Regulation, having implemented the necessary personal data security measures. Adequate compliance with the processing of personal data is guaranteed, and in particular with respect to the rights of the holders of such data to be informed about the processing thereof. Specifically, it guarantees the use of personal data only for the relevant purposes, the minimization of the data processed, compliance with the periods of conservation of personal data, as well as the exercise of rights by data subjects.