

global payment systems

OPERATING POLICY

COMPLAINTS CHANNEL

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Control sheet

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1. INTRODUCTION

A Complaint Channel is a tool whose purpose is to be a means of communication through which employees, collaborators, suppliers and others can send communications or complaints about risks or suspicions of irregular conduct and non-compliance with regulations. In this way, the responsible body will investigate them and, if necessary, adopt appropriate preventive, corrective or sanctioning measures.

Therefore, in order to improve both communication and management at Global Payment Systems S.L. (GPS), as well as to facilitate and encourage the reporting of irregularities, we have created the Complaint Channel, available to all employees of Global Payment Systems S.L. and third parties related to the company, through which it is possible to report any professional negligence and illicit and/or irregular or unethical conduct occurring within the organization.

The main objective is to foster a culture of transparency, trust, integrity and accountability. In short, the performance of GPS activities in an ethical environment and respect for external and internal regulations.

These are also objectives of this policy:

- To provide legal protection to those who are willing to report non-compliance and who as a result could be retaliated against in a variety of ways, such as dismissal, change of job, loss of contract in the case of a supplier, etc.
- Promote the use and culture of information of this communication tool.

2. SCOPE OF APPLICATION

The following people will be able to use this tool:

- GPS personnel.
- External personnel such as consultants, vendors, freelancers, interns, etc.
- Legal entities with whom the organization has established or plans to establish any business relationship, including clients, customers, consumers, contractors, consultants, subcontractors, suppliers, vendors, advisors, consultants, agents, distributors, representatives, intermediaries, investors, joint venture partners, consortium partners, subcontracting providers, business alliances, etc.
- Trade union representatives.
- Any other person who has held or will hold any of the positions set forth in this section.

3. CHANNEL MANAGEMENT

A channel has been established for communicating internal company complaints or disclosing information on irregular conduct that may occur within the Organization. This channel is available at the link: <https://secure.revealit.app/form/denuncias-grupo-petroprix>.

The Channel shall be accessible, visible and secure, thus providing confidence to any person wishing to use it to disclose irregular conduct.

Annually, a report shall be prepared summarizing the Channel's activity in the fiscal year. The information contained in this report will not contain information on the identity of the parties involved in the complaints or disclosures of wrongdoing.

Once the reports are received, they will be evaluated taking into account certain aspects or factors that contribute to determine the seriousness of the matter reported or disclosed.

Based on this, the treatment will be proposed to carry out the investigation of the reported facts, which will respect at all times the impartiality with all parties involved, such as the business unit or department, the complainant and the reporter. Adequate resources will be made available at this stage, including experts in the matter in question.

The management will end, whether or not any irregularity has been detected, as any investigation, i.e., with a conclusion that may or may not establish the need to take any action in response to the complaint.

4. REPORTABLE FACTS

The irregularities that could be reported, disclosed or denounced in this channel, by way of example, but not exhaustively, would be the following:

- **Harassment:** Any action of insisting on a person for something that is annoying or harmful to that person. It includes harassment in all its forms.
- **Fraud and corruption:** Any action that involves any type of corruption, bribery or fraud (e.g., giving or receiving gifts, presents and hospitality when this could affect objectivity or influence a commercial, professional or administrative relationship).
- **Practice contrary to the Code of Ethics and Conduct:** Any behavior that is contrary to the commitments developed in the Code of Ethics and Conduct, understanding any action that is contrary to honesty, responsibility, transparency and commitment, without being unduly influenced either by their own personal interests or by third parties.
- **Conduct related to Money Laundering:** Any action that may be related to money laundering or that does not comply with the regulations on this matter.
- **Health and Safety Risks:** Any negligent attitude of a colleague, hierarchical superior or of the company itself, which may put at risk any person, whether an employee or an unrelated third party.

- **Bad practices:** Any undesirable situation such as offering gifts to third parties in order to obtain business, failing to comply with any type of legal or internal regulations, etc.
- **Respect and Equal Opportunity:** Any action that involves any type of discrimination based on gender, race, sexual orientation, religious beliefs, opinion, religion, age, gender identity or sexual orientation.

It should be borne in mind that irregularities or damage resulting from irregularities may have occurred at an earlier point in time, may be occurring now, or may occur in the future.

5. NON-REPORTABLE FACTS

All facts that are not included in the reportable facts, such as complaints about invoices, incidents related to the access to a product or other issues that do not involve an irregular or unlawful conduct as those described in the previous section, are considered non-reportable facts.

For these cases, please contact the GPS Customer Service Department by email: atencionalcliente@wipay.es

6. COMMUNICATION MEANS

According to the applicable regulations, an internal complaint is a verbal or written communication of information about violations within a legal entity in the private or public sectors. In this case, in order to guarantee the confidentiality and security of the complaints, the management will be carried out in written form, specifically through the web page, the company's Intranet (Petronet), or by accessing through the following link: <https://secure.revealit.app/form/denuncias-grupo-petroprix>

Likewise, other means of communication may be used to disclose knowledge of irregular conduct in the Organization, such as telephone, verbal communication to the Area or Department Manager, communication to the Director of the Compliance Office, e-mail or any other means of communication.

7. COMPLAINT REQUIREMENTS

The complaint must contain the following minimum requirements:

- A. In case it is not anonymous it must include name and surname(s) of the complainant and contact details (e-mail and/or telephone).
- B. Identification of the person responsible for the irregularity: name and surname(s) of the reported person, position held in the company, if there are several departments or persons involved, etc.

- C. Reported conduct or irregularity: description of the circumstances of the reported irregularity, answering questions such as; what it consists of, when it occurred, etc.

If possible, documents or evidence of the reported facts should be attached, especially if the report is anonymous.

8. GUIDING PRINCIPLES OF THE ETHICAL CHANNEL

The guiding principles of the GPS Ethics Channel are as follows:

- **Principle of good faith:** persons reporting must act in good faith and not make false accusations through this medium. Good faith consists of giving information without malice, without considering personal benefit and considering truthful information in a reasonable manner and with the means at their disposal. Personnel who deliberately make false, misleading or bad faith statements may be subject to disciplinary action in accordance with applicable law.
- **Prohibition of retaliation against the reporting person:** GPS formally states that it does not tolerate retaliation of any kind committed on persons who make use of the procedures established to report irregular conduct.
- **Principle of confidentiality:** measures are taken to preserve the identity and ensure the confidentiality of the data corresponding to all persons affected by the information provided in the communications of the Ethics Channel. In particular, in the case of non-anonymous reports, the identity of the reporting person must be kept confidential at all stages of the process of investigation and resolution of the report, so it must not be disclosed to third parties or, therefore, to the person reported. Without prejudice to the foregoing, the data of the reporting person and of the other parties involved may be communicated to the courts or tribunals, to the Public Prosecutor's Office, to the Forces and Corps of Law and Order, and to the police.

9. STAGES OF THE PROCEDURE FOR PROCESSING AND INVESTIGATING A COMPLAINT FILED THROUGH THE CHANNEL

9.1. COMMUNICATION PHASE

The GPS Ethical Channel can be accessed via e-mail canal.denuncias@wipay.es, in the link provided on the web site www.wipay.es, or through the company's Intranet (Petronet).

Once the complaint or non-compliance has been communicated, it will be handled by the person in charge of the Channel appointed by the company.

The content of the complaint must include a specific and precise description of the facts denounced, the area or department affected, the date or period of commission and the

possible parties responsible. Likewise, the complainant may attach any evidence available to him/her.

Anonymous complaints will be admitted, in which case the complainant will not have to fill in his/her name and ID or contact information.

Notwithstanding the foregoing, all requests or communications will be treated confidentially.

Communications are prohibited when the informant is not acting in good faith.

These are bona fide communications:

- Those that are made in accordance with the provisions of this Procedure, those that are based on facts or indications from which an irregular behavior, contrary to the Code of Conduct or any other internal or external regulation of GPS can be reasonably inferred.
- Those in which, although no document or any other material that supports the evidence of the communication can be provided at the time of the communication, are made in accordance with the provisions of this Procedure and are made without manifest disregard for the truth, without intent to retaliate, to cause a labor or professional damage or to harm the honor of any employee, associate or third party, among others.

A bad faith informant may be subject to disciplinary sanction, regardless of the criminal and civil liabilities that may arise from such actions.

9.2. ANALYSIS PHASE

9.2.1. Receipt and Admission of communications

Within 7 working days following the receipt and registration of the complaint, the receipt of the complaint will be acknowledged, informing the complainant through the address provided by him/her as contact information. In the event that the complaint is anonymous, the follow-up will be done through the link generated for this purpose.

Then, a maximum period of 7 working days is established from the receipt of the complaint for its analysis in order to determine whether it is admitted for processing and management, in which case the appropriate file will be opened.

The following are causes of inadmissibility of the complaint:

- When the content of the complaint does not involve a breach of the principles and values defined in the Code of Ethics.
- Facts manifestly unfounded and without any accreditation.
- Lack of reasonable evidence to support the same.

- Description of the facts in a generic, imprecise or unspecific manner. Prior to the rejection of a complaint for this reason, the person in charge of the channel shall inform the complainant of the deficiencies in his complaint and shall grant him a period of 5 working days in order to clarify, specify or duly specify the facts to which he refers. If such deficiencies are not remedied within the aforementioned period, the complaint shall be rejected.

In any case of inadmissibility, the complainant will be informed in writing and at the contact address provided by him/her of the reasoned decision of inadmissibility. Likewise, the status will be changed to "communication" and the complainant will be allowed either to accept or not to reply to the rejection and then the complaint will be filed; or the complainant will not accept and will present allegations through the channel.

In order to facilitate the analysis of the complaints received, the following aspects are established to be taken into account in order to consider their importance:

- Number of persons or departments affected
- Amount associated with the complaint
- Impact on the continuity of the business
- Damage to the image and reputation of the Organization
- Non-compliance with legislation
- Potential criminal liability arising from the reported event

9.2.2. Opening of the file

If, after analyzing the facts contained in the Communication, the person in charge of the Channel considers that there are reasonable indications of the existence of non-compliance, he/she will agree to open a file and start the corresponding internal investigation.

At this point, it is advisable to assess whether, in parallel, additional urgent measures should be taken to avoid jeopardizing the development of the investigation, or to protect the Stakeholder.

The status is changed to "Investigation".

9.3. RESEARCH PHASE

9.3.1. Internal Communication Research

In this phase, the person in charge of the Channel or third parties specifically designated to collaborate in the investigation, may gather the information and documentation they deem appropriate in order to determine the certainty or plausibility of the facts or indications reported.

A maximum period of three months from the admission of the complaint is established for the investigation to be carried out. Said term may be extended for another term of the same duration in those cases in which the investigated facts are complex, or special technical, accounting or computer knowledge is required, as well as in cases of accumulation of complaints.

The person in charge of the Channel or the third parties specifically designated, shall prepare a report on the content of the complaint, which shall contain the following conclusions:

- Infringements detected
- Possible responsible parties
- Defined risks
- Established controls
- Quantification of loss
- Action plans
- Allegations of the accused, who shall be granted a reasonable and sufficient period of time, not less than 10 working days, in order to make allegations and provide the evidence he/she deems appropriate.

The instructor's report shall be referenced to the proofs or evidence that may exist or the absence thereof, and shall be sent to the Compliance Officer.

9.3.2. Information and hearing

The persons who have been identified as allegedly irregular in the complaint must be informed, provided that the procedure so permits and does not hinder the proper investigation of the facts reported.

Through this hearing process, the right of the Interested Party and the Complainant to present arguments, allegations and evidence in writing shall be guaranteed.

9.4. RESOLUTION PHASE

9.4.1. Conclusions and proposed resolution of the investigation

Based on the conclusions reached during the internal investigation, a report shall be prepared and a resolution of the case shall be proposed with the following minimum content:

- Brief description of the investigation
- Facts proven by the investigation
- Conclusions, which may include, as the case may be:
 - the declaration of the existence of the non-compliance, in which case, the proposal of measures to be taken, or
 - the closing of the case, in the event that it is concluded that there has been no non-compliance.

- Additional guarantees, such as indicating to which persons or persons in charge of the Department it is proposed to communicate the content of the resolution.

9.4.2. Resolution of the investigation

It will be the responsibility of the CRAI Committee or the Sole Administrator, as the case may be, and will be communicated to the affected stakeholders and those persons or Department heads who must execute the resolution.

The person in charge of the Channel, or specifically designated third parties, will make the report of the conclusions of the investigation, informing the members of the company related to the complaint (corresponding director of the affected area, HR department, etc.), with the purpose of initiating the implementation of the corresponding actions as a result of the conclusions of the study carried out.

In the event that there is no evidence of wrongdoing, the arguments supporting such resolution will be recorded and the status will be changed to "Resolution of the complaint" and the complainant will be informed, who may submit allegations in the communication channel. If the complainant does not do so or does not reply, the status will be changed to "Archive" and the process will end.

In the event that there are indications of a crime, the person in charge of the Channel or the third parties specifically designated for the investigation may, at their discretion, not inform the corresponding director, submitting the report to the CRAI Committee.

If necessary, reports may be made in accordance with the applicable jurisdiction depending on the subject matter.

The result of the investigation shall be communicated in writing by e-mail to the person who filed the complaint, as well as to the complainant.

9.4.3. Preservation, custody and archiving of information

The Channel Manager must keep an updated record of all communications received, as well as, if applicable, of the internal investigations carried out and the measures adopted, for the periods of time that, in accordance with the applicable regulations, are legally permitted in each case.

To this end, a minimum amount of information on each communication investigated containing these data should be kept updated at all times:

- Date of receipt of the complaint.
- Means by which the complaint was received.
- Details of the Complainant and the Interested Party.
- Summary of the nature of the complaint and the facts on which non-compliance can be appreciated.

- Dates of information to the Complainant and the Interested Party.
- Documentation used in the investigation of the complaint.
- Status of the investigation.

Personal data obtained within the framework of the internal investigation shall be deleted when they are no longer necessary and relevant and, in any case, no later than three (3) months after the complaint is registered, unless the investigation is still ongoing.

As regards personal data relating to complaints that do not fall within the scope of the Channel, are not necessary for the development of the investigation and/or are not subject to investigation, they shall be deleted without delay, with the exception of making them available to the Public Administrations or Jurisdictional Bodies, in the event that they may be necessary for the attention of possible liabilities during the corresponding prescription periods. After this, the data will be physically deleted.

10. EVALUATION

Once a complaint has been filed, the effectiveness of the actions implemented will be evaluated: consultation with the complainant, analyses, audits, etc.

Finally, a report will be prepared annually, in the first quarter, for the CRAI Committee with the data recorded for the year (January-December): number of complaints, their content, actions taken, resolution times. This report will omit the identity of the complainant, the complained against, as well as those involved in the procedure of each case. Consideration will be given to how it can be used for organizational learning: improvements in controls, policies, procedures, etc.

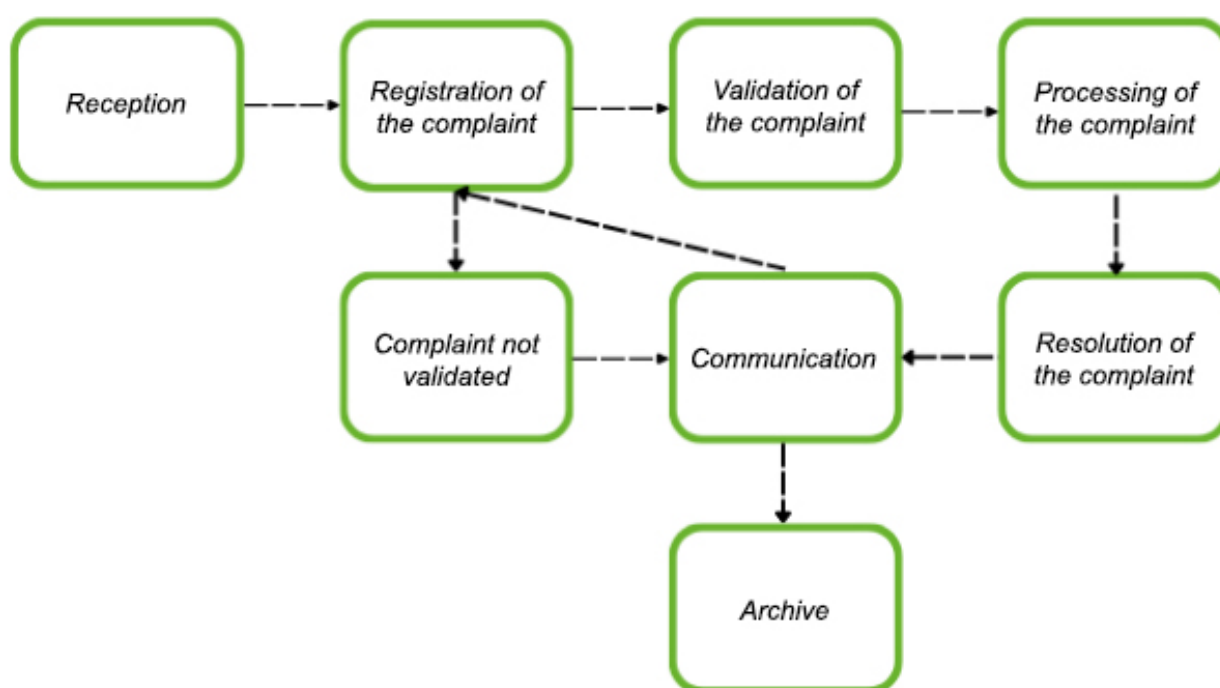
11. DEADLINES

COMMUNICATION PHASE	
Acknowledgement of receipt	7 working days from the communication of the report
ANALYSIS PHASE	
Admission of the complaint	7 working days from the communication of the complaint
Communication to the complainant	7 working days from the admission decision
Correction of deficiencies in the complaint	7 working days from the communication of such deficiencies
Notification to the defendant	3 months from the admission of the complaint
RESEARCH PHASE	
Investigation report	3 months from the admission of the complaint (possible prolongation in case of greater complexity)

Notification to the accused	10 working days from the communication of the result of the investigation.
RESOLUTION PHASE	
Resolution of the file	1 month from the end of the investigation
Deletion of personal data obtained in the investigation	3 months from registration of the complaint

The deadlines indicated may be subject to change depending on the progress of events and the investigation. In the event of a delay due to a justified cause, the complainant will be informed in order to update the deadlines.

12. COMPLAINT MANAGEMENT PROCESS



13. TRAINING, DISSEMINATION AND PUBLICITY

In accordance with the provisions of Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, the organization has published on its home page of the website, in a separate and easily identifiable section, a direct access to the Whistleblower Channel, on its page <http://www.wipay.es>.

This Policy will be published on the website and made available to all employees.

The organization shall carry out training and dissemination of this Policy and the management procedure of the Internal Information System, with the aim of making it known and encouraging its use.

14. APPROVAL, ENTRY INTO FORCE AND REVISION OF THE DOCUMENT

This Policy is approved by the Sole Administrator and shall enter into force at the time of its publication on the website, and shall be reviewed annually or when circumstances change that make it necessary to do so.