

# WHISTLEBLOWER CHANNEL POLICY

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## 1. The purpose of this policy

CAMPER and all the subsidiary companies included in the corporate group (hereinafter, jointly “CAMPER”) advocate for establishing a culture of transparency, ethics and zero tolerance against any behaviour that might entail a breach of current legislation, our Code of Conduct and Ethics or any other corporate policies.

Therefore, at CAMPER we have a Complaints Management System available to any individual who becomes aware, in an employment or professional capacity or as a result of their business activity, of any behaviour that might infringe current legislation or our corporate policies and wishes to report it. The system includes appropriate guarantees of confidentiality and protection against possible reprisals.

The purpose of this policy (hereinafter, the “Policy”) is to define the general principles that we, as a company, uphold, encourage and adopt as part of the procedure of receiving, processing, registering, investigating and responding to the reports received, and that inspire the rest of the internal regulations governing the operation of the Complaints Management System.

Moreover, it contains a description of the key components within the referred System and provides information on other so-called “external” communication channels which the Whistleblower can also approach to file a report with a specialised public authority.

## 2. Scope of application

This policy applies to anyone who works with CAMPER, regardless of their location or their legal connection to the company, as well as other interest groups which, in a professional context or on the basis of a business activity, identify possible infringements (regardless of whether or not they have ended their professional relationship or business activity) related to the Whistleblower (as defined below), who may suffer reprisals.

## 3. Definitions

**Whistleblower Channel:** an internal information channel set up by CAMPER within the Complaints Management System, for receiving reports on:

- Infringements of the Code of Conduct and Ethics
- Infringements of corporate policies
- Infringements of the law
- Conflicts of interest

**Working person:** any individual who has a working relationship with CAMPER, regardless of the form it takes, including: a) people going through the recruitment process, b) volunteers, interns, and workers undergoing training, whether or not they receive a salary; c) working persons who have ended their employment relationship with CAMPER; d) representatives of working persons.

**Whistleblower:** any person who reports an infringement to the Whistleblower Channel set up by CAMPER.

**Infringement:** any act or omission that might constitute a serious or extremely serious criminal or administrative infringement of the law, the Code of Conduct and Ethics or internal regulations.

**Person connected to the Whistleblower:** individuals who help the Whistleblower during the investigation process; work colleagues, family members and other third parties who could suffer reprisals due to their relationship with the Whistleblower; legal entities with which the Whistleblower maintains any type of employment relationship or in which they hold a significant share of the capital or voting rights. Like the Whistleblower, none of them may suffer any type of reprisal, therefore unless stated otherwise, any reference to the Whistleblower in relation to reprisals is understood to include people connected to the Whistleblower.

**Reprisal:** any act or omission prohibited by law or that directly or indirectly involves unfavourable treatment, putting the people who suffer it at a particular disadvantage with regard to others in the employment or professional environment, solely due to their condition as a Whistleblower or for having made a public disclosure. Some examples of reprisals are: suspension, dismissal, termination or failure to renew the employment contract; demotion or failure to promote; substantial amendments to the employment contract; reputational damage or financial losses, coercion, harassment or ostracism; negative assessments or references regarding professional performance; inclusion in a black list, denial of training; discrimination or unfavourable treatment, etc.

**Complaints Management System:** CAMPER's system for receiving and managing information on Infringements, which includes:

- a. The preferred channel, mailbox or route for receiving the information (Whistleblower Channel)
- b. The System Manager
- c. The procedure for managing this information.

**Independent Authority for Whistleblower Protection (*Autoridad Independiente de Protección al Informante, AAI*):** Independent Administrative Authority, with its own legal personality, that Whistleblowers can approach to report a crime happening within an organisation. This authority is regulated by the Spanish Law on the protection of whistleblowers.

#### **4. Internal and external reporting channels, people who can make reports and how to do them**

We make the Whistleblower Channel available to Whistleblowers; this is the preferred route for reporting behaviour that could constitute an Infringement. The Whistleblower Channel can be found at this link: <https://report.whistleb.com/en/camper>

The Whistleblower also has the option of using other external channels to report information about any infringement to the Independent Authority for Whistleblower Protection (AAI). For more information about external channels, please see Appendix I to this Policy.

Furthermore, the Whistleblower may also ask for a face-to-face meeting with the System Manager within no more than seven (7) business days of making the complaint.

In the event that working people, directors, line managers, administrators or shareholders of CAMPER receive a warning or complaint via any means whatsoever, they must maintain absolute confidentiality avoiding disclosure of any information that could make it possible to identify the Whistleblower, the Suspect or those affected, and must immediately send it to the Whistleblower Channel Committee via the Whistleblower Channel.

Complaints can be made by a named person, with the Whistleblower's identification, or completely anonymously. Whatever the case, the guarantees and principles set out in this Policy will be observed.

Complaints must include the following content, notwithstanding the fact that some sections are optional:

1. Entity to which the facts relate (mandatory)
2. Description of the facts (mandatory)
3. Identification details of the Whistleblower (optional)
4. Indicate an address, email or safe place for receiving notifications (optional)
5. Whether you want to make the complaint at a face-to-face meeting (optional)
6. Evidence (optional)

## **5. System Manager**

The System Manager is appointed by the Whistleblower Committee; the Independent Authority for Whistleblower Protection (AAI) must be informed of their appointment within ten (10) business days of the date of their appointment (this applies in the territory of Spain).

The Whistleblower Channel Committee will be the System Manager, in other words, they will be the recipient and responsible for managing any reports received via the Whistleblower Channel, with one of its members, the Head of Personnel Administration, being its individual manager and the person in charge of any investigations that, where appropriate, are carried out.

Although the System Manager receives the reports, they may delegate their initial reception to a specialist external service provider, which will be required to provide, among other things, appropriate guarantees that it will observe the independence, confidentiality, data protection and secrecy of the reports, as well as signing the respective contract as a data processor.

Initial receipt of the reports by an external third party does not involve a lessening of the guarantees and requirements of said Complaints Management System, or the assignment of responsibility over this to a person other than the System Manager.

The System Manager must carry out their duties independently and autonomously with regard to CAMPER's other bodies and its board of directors. They may not receive any type of instruction regarding the exercise of their duties and must possess all the human and material resources needed to perform their duties.

The Independent Authority for Whistleblower Protection (AAI) must also be informed about the termination of the System Manager within the following ten (10) business days, with the notification specifying the reasons for their termination (this applies in the territory of Spain).

## 6. System and investigation process guarantees

Any complaints received via the Whistleblower Channel must comply with the following principles and guarantees: The Management System must possess all the appropriate security measures to guarantee the management and confidentiality of complaints, as well as guaranteeing due impartiality and objectivity and protecting personal data in accordance with the applicable legislation.

## 7. Whistleblower and suspect guarantees and rights

**Whistleblowers are entitled** to keep their identity a secret from unauthorised third parties, unless they consent to it being disclosed; to be free from any reprisals for having made a complaint in good faith and to receive an acknowledgement of receipt for their complaint within no more than seven calendar days of the complaint being received (unless this would jeopardise the confidentiality of the report) and information about the status of their complaint by the respective deadlines.

The Whistleblower may only be penalised in the event that the complaint was made in bad faith, if there are reasonable indications that the complaint was untrue and the information given was false.

**Reported persons are entitled** to a presumption of innocence and the right to honour, to being heard, to confidentiality, to a defense, to access the file (with the constraints provided for by law), and to objectivity and impartiality when decisions are taken. Likewise, they are entitled to a process with all the guarantees, which respects all legal provisions and the applicable corporate policies regarding deadlines and the adoption of measures proportional to the severity of the facts that occurred. They are entitled to know the results of the investigation and any applicable corrective measures.

The System Manager, together with the respective departments, shall implement the appropriate follow-up actions to ensure compliance with these guarantees.

## 8. Reporting doubts and breaches

As stated in our Code of Conduct, the obligation to report situations of risk that may occur within or outside the company that could result in damage or harm to any individual or entity exists at all levels at CAMPER. Specifically, infringements of the law, the Code of Conduct or of the corporate policies that implement it, must be reported via the Whistleblower Channel.

For more information on the management of the Whistleblower Channel and the reports received, please see the Complaints Management Procedure.

## 9. Disciplinary system

Failing to comply with the law, the Code of Conduct and Ethics or the corporate policies that implement it, as well as with this document, is an infringement, the extent of the penalty and punishment of which is applied in accordance with current applicable legislation and corporate policies.

The disciplinary procedure is started as a result of an investigation, an external report or as a consequence of the System Manager's knowledge of the alleged infringement.

Disciplinary measures are not only imposed on those whose behaviour has caused the infringement, but can also be imposed on any other person who has failed to follow the applicable regulations for the prevention, detection and/or correction of risk, circumstances that are themselves considered to be an infringement of CAMPER's values and ethical principles.

If the infringement is confirmed, CAMPER will enforce the applicable internal or contractual measures and, where appropriate, any legal actions it considers appropriate against those responsible for the infringement.

## **10. Governance**

This policy was adapted to current applicable standards at the time of its review and will be adapted to any legislative changes and jurisprudential case law that may occur in its geographical scope of application.

The Compliance Committee will review and update this Policy regularly with the aim of including any changes and improvements made.

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## APPENDIX – External information channels

In accordance with the Law on the protection of Whistleblowers, the competent Independent Authority for Whistleblower Protection may be informed of the commission of any acts or omissions covered by the scope of application of this Policy, either directly or following a report via the respective internal channel.

In Spain, this function corresponds to the Independent Authority for Whistleblower Protection (AAI). Some Autonomous Communities have respectively appointed independent authorities that assume similar duties to the AAI, when the potential infringements are only considered as such in the territory of the corresponding Autonomous Community. The European Union also has external information channels.

Please find below a table showing the different competent independent authorities for Whistleblower protection in Spain:

Whistleblower Protection Authorities	
European Union Authority	
Name	European Anti-Fraud Office ( <i>Office Européen de Lutte Antifraude</i> , OLAF)
Contact details	<a href="https://anti-fraud.ec.europa.eu/index_es">https://anti-fraud.ec.europa.eu/index_es</a>
Spanish Authority	
Name	Autoridad Independiente de Protección del Informante, AAI (Independent Authority for Whistleblower Protection)
Contact details	- Information yet to be published by the Ministry of Justice
Catalonian Authority	
Name	Oficina Antifrau de Catalunya (Antifraud Office of Catalonia)
Contact details	<a href="https://www.antifrau.cat/">https://www.antifrau.cat/</a>
Andalusian Authority	
Name	Oficina Andaluza contra el Fraude y la Corrupción (Andalusian Authority against Fraud and Corruption)
Contact details	<a href="https://antifraudeandalucia.es/">https://antifraudeandalucia.es/</a>
Valencian Community Authority	
Name	Agencia Valenciana Antifrau (Antifraud Agency of Valencia)
Contact details	<a href="https://www.antifraucv.es/buzon-de-denuncias-2/">https://www.antifraucv.es/buzon-de-denuncias-2/</a>
Balearic Islands Authority	
Name	Oficina de Prevenció i Lluita contra la Corrupció a les Illes Balears (Office for Prevention and Fight against Corruption in the Balearic Islands)
Contact details	<a href="https://www.oaib.es/">https://www.oaib.es/</a>