



Teltronic

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**Teltronic, S.A.U.
Whistleblowing Channel Policy**

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1. PURPOSE AND SCOPE

This Policy is part of the Compliance Programme and aims to establish the necessary provisions for the Whistleblowing Channel to comply with the requirements stipulated in Law 2/2023, of 20 February, regulating the protection of people who report regulatory and anti-corruption breaches.



This Policy seeks to ensure that, if a complaint related to the Compliance Program is submitted through any of TELTRONIC's internal channels, it will be treated in a professional and confidential manner.

The main objectives of this Policy are as follows:

- Identify the internal and external channels of information to which this Policy is associated.
- Determine the maximum period for responding to investigative actions.
- Establish the right of the affected person to be informed of the actions or omissions attributed to him/her, and to be heard at any time.
- Ensure the confidentiality of the whistleblower, as well as when the communication is sent through channels other than those established or to staff members not responsible for its processing.
- Ensure the defense, honour, and presumption of innocence of the persons under investigation.

2. DEFINITIONS

A.A.I.

It refers to the Independent Whistleblower Protection Authority.

Criminal Compliance Committee

This refers to the body responsible for supervising the operation and compliance of the *Compliance Program*.

EEG

Refers to the external entity managing the Whistleblowing Channel that may exist at any time during the term of the Compliance Program

Teltronic Group or Group

It refers indistinctly to Teltronic, S.A.U. and all its subsidiaries, branches and, ultimately, subsidiaries, existing at any given time.

Compliance Program

It refers to the crime prevention and detection model implemented in the Teltronic Group.

Politics

It refers to this criminal enforcement policy.

TELTRONIC

Ref of Teltronic, S.A.U.

User

Any director, director, employee or intern, regardless of the type of contract they have and/or the country where they work, who is part of the Teltronic Group, as well as any Business Partner or other type of third party (including, without limitation, public employees, employees, self-employed persons, shareholders, etc.).

3. CHANNEL ACCESS

The Whistleblowing Channel is a communication channel accessible to all Users in relation to any entity of the Teltronic Group.

All complaints submitted through the Whistleblowing Channel are anonymous to the entity or individual that is the subject of the complaint, and their confidentiality is also guaranteed.

In this regard, all Users with a legitimate interest must contact the Whistleblowing Channel to report any possible query or non-compliance, whether it affects them personally or third parties.

Communications to the Whistleblowing Channel may be made through the following means:

- The web address <https://canal-denuncias-consultas-teltronic.i2-ethics.com/>
- canaldedenuncias@teltronic.es
- Address: Polígono Industrial Malpica, Calle F Oeste, 50016, Zaragoza (Spain) for the attention of the TELTRONIC Criminal Compliance Committee.

In any case, the complaints submitted must contain, as far as possible, at least the following information:

- Identification of the complainant, although complaints submitted anonymously will be processed.
- Description of the reported event:
 - What is the alleged misconduct?
 - Possible people involved.
 - Approximate dates of occurrence of the events.
 - Means by which the irregularity has been carried out.
 - Affected business areas.
 - Relevant processes affected (e.g. procurement, accounting, treasury, etc.).
 - Potential economic impact.

- If applicable, provide documents or evidence of the facts.

In any case, it is recommended that the communication be as descriptive and detailed as possible, thus making it easier for the recipient to identify the person(s) or department(s) involved.

A complaint may also be lodged with the A.A.I. or equivalent regional body.

4. ACKNOWLEDGMENT OF RECEIPT AND INVESTIGATION OF THE COMPLAINT

4.1. RECEIPT OF THE COMPLAINT

Complaints will be received by the EEG. Likewise, the corresponding acknowledgement of receipt will be sent within seven (7) days of receipt of the complaint to the complainant, in the event that such person has identified himself or herself and unless this may jeopardize the confidentiality of the communication.

In the event that it deems it so, the EEG may request the person making the communication to extend it, in order to properly carry out the preliminary analysis of the complaint.

4.2. INVESTIGATION OR FACT-FINDING

The investigation and verification of the facts will be carried out in accordance with the provisions of the Regulations of the Whistleblowing Channel.

The EEG shall have three (3) months from the acknowledgment of receipt or, if no acknowledgment of receipt was sent to the complainant, three (3) months from the expiry of the period of seven (7) days after the complaint is made to respond to the investigation. In the event of justified causes, the investigation of the procedure may be extended for another 3 (three) months.

In addition, the information will be forwarded to the Public Prosecutor's Office immediately when the facts may constitute a criminal offence. In the event that the facts affect the financial interests of the European Union, it will be referred to the European Public Prosecutor's Office.



5. RESPONSIBLE DATA PROTECTION

The processing of the data obtained as a result of communication through the Teltronic Group's Whistleblowing Channel will be subject to current data protection regulations.

TELTRONIC will not disclose the data or inform other persons or third parties other than those who, in accordance with current regulations, are legally authorized, and neither may such data be used or transferred for purposes other than those established by law.

5.1. IDENTIFICATION OF THE RESPONSIBLE PARTY

Company name: TELTRONIC, S.A.U.

NIF: A50035518

Address: C/ F Oeste Parcela 12, Políg. Malpica 50016 Zaragoza (Spain).

Tel.: +34 976 46 56 56

Web: www.teltronic.es

If you have any privacy concerns, you may contact TELTRONIC at any time at the following address: protecciondedatos@teltronic.es.

You are hereby informed about the way in which TELTRONIC collects, processes and protects the personal data provided to it by whistleblowers of the Whistleblowing Channel.

The data requested by TELTRONIC are, in general, mandatory (unless otherwise specified in the required field) in order to comply with the established purposes.

5.2. FOR WHAT PURPOSE WILL TELTRONIC S.A.U. PROCESS THE WHISTLEBLOWER'S PERSONAL DATA AND FOR HOW LONG?

Access to the personal data contained in the Whistleblowing Channel will be limited, within the scope of its powers and functions, exclusively to:

- The person in charge of the Whistleblowing Channel and the EEC, which manages it directly.
- The person in charge of Human Resources or the duly designated competent body, only when disciplinary measures could be taken against an employee.
- The person in charge of the legal services of the entity or body, if it is appropriate to adopt legal measures in relation to the facts reported in the communication.
- The data processors that may be appointed.
- The data protection officer, if appointed.

The processing of data by other persons, or even its communication to third parties, will be lawful when it is necessary for the adoption of corrective measures in the entity or the processing of the sanctioning or criminal proceedings that, where appropriate, may be appropriate. For example, to the entities listed in section 7.6.

Under no circumstances will personal data that is not necessary for the knowledge and investigation of the actions or omissions referred to in article 2 of Law 2/2023 of 20 February be processed, and their immediate deletion will be deleted, where appropriate. Likewise, all personal data that may have been communicated and that refer to conduct that is not included in the scope of application of the aforementioned law will be deleted.

If the information received contains personal data included in the special categories of data, it will be immediately deleted, without being recorded and processed.

The data that is subject to processing may be kept in the information system only for the time necessary to decide on the admissibility of initiating an investigation into the facts reported.

If it is proven that the information provided or part of it is not truthful, it must be immediately deleted as soon as this circumstance becomes known, unless such lack of veracity may constitute a criminal offence,

in which case the information will be kept for the necessary time during which the legal proceedings are being conducted.

The personal data collected will be processed by TELTRONIC for the following purposes:

- Manage the processing of complaints that are submitted to the Criminal Compliance Committee through the procedure established in the Regulations of the Whistleblowing Channel approved by TELTRONIC.
- To carry out an investigation of the facts denounced in order to clarify them.
- Comply with the legal obligations established for TELTRONIC in all applicable regulations.
- After a period of three (3) months from the filing of the complaint, your data will be deleted from the Whistleblowing Channel system, except for the purpose of leaving evidence of the operation of the system. Exclusively in cases where an investigation procedure is being carried out, they may be kept in external media, and accessible exclusively by the body responsible for their management.

Communications that have not been processed may only be recorded in anonymised form, without the blocking obligation provided for in article 32 of Organic Law 3/2018, of 5 December, being applicable.

5.3. WHAT IS THE LEGITIMACY OF THE DATA PROCESSING?

The legitimate cause on which the processing of your data will be based will be compliance with a legal obligation (art. 6.1 c) GDPR), as well as Teltronic's legitimate interest in maintaining legality and order in its processes and workplaces (art. 6.1 f) GDPR).

5.4. TO WHICH ENTITIES MAY THE USER'S DATA BE COMMUNICATED?

Your data may be communicated to:

- Public Administrations, in the cases provided for by Law.
- Judges and Courts.
- State security forces and bodies.

The data related to the investigations will be limited exclusively to those who, whether or not they are part of TELTRONIC, carry out the functions

of internal control and compliance, or to the data processors who may be designated for this purpose.

The data may be transferred to entities of the Hytera Communications Corporation Limited group of companies, of which TELTRONIC is a member, in the event of legal proceedings arising from the communication.

Likewise, the data may be transferred to and/or received by the EEG, with whom the corresponding data processor contract will be signed in accordance with current legislation.

5.5. EXERCISE OF RIGHTS

At any time, you will have the right to the satisfaction of your rights of access, rectification, deletion and opposition, as well as to obtain from TELTRONIC the limitation of the processing of the data when any of the conditions provided for in the data protection regulations are met and, where appropriate, to request the portability of your data. To exercise these rights, you may contact TELTRONIC through the following channels: by writing to TELTRONIC, or by sending an email to the address protecciondedatos@teltronic.es, in both cases with the Reference "Data Protection" attaching a photocopy of your identity document.

6. SECURITY MEASURES

TELTRONIC will treat your data at all times in an absolutely confidential manner and maintaining the mandatory duty of secrecy with respect to them, in accordance with the provisions of the applicable regulations, adopting for this purpose the necessary technical and organisational measures to guarantee the security of your data and prevent its alteration, loss, processing or unauthorised access. taking into account the state of technology, the nature of the data stored and the risks to which they are exposed.

7. STATUTE OF COMPLAINANT AND DEFENDANT

TELTRONIC will respect the following basic rights of the whistleblower and the accused at all times during the process of collecting, investigating and resolving the complaints communicated through the Whistleblowing Channel.

7.1. CONFIDENTIALITY



TELTRONIC undertakes to treat personal data at all times in an absolutely confidential manner and in accordance with the purposes set out in this Regulation. In this regard, TELTRONIC guarantees the absolute confidentiality of the whistleblower or interested party and the other participants throughout the communication management process, even when the complaint is not sent through the Whistleblowing Channel or to members of the staff not responsible for its processing, who must immediately forward it to the person in charge of the Human Resources department.

The identity of the whistleblower will be preserved in accordance with the provisions of Article 33 of Law 2/2023.

7.2. RIGHT TO INFORMATION OF THE COMPLAINANT

The person accused in the complaint filed through the Whistleblowing Channel must be informed by the investigator of the investigation as soon as possible, as well as of the actions or omissions attributed to him. From this moment on, you have the right to be heard at any time in relation to the content of the complaint.

However, where there is a significant risk that such notification may jeopardise TELTRONIC's ability to effectively investigate the complaint or collect the necessary evidence, notification to the respondent may be delayed for as long as such risk exists. The objective of this measure is to preserve evidence by preventing its alteration or destruction by the accused, although it must be applied restrictively, being assessed on a case-by-case basis.

7.3. PROCEDURAL SAFEGUARDS

The Regulations of the TELTRONIC Whistleblowing Channel regulate the procedure for carrying out the investigation and resolution functions in such a way as to guarantee the right to defence and the right to the presumption of innocence and honour of the persons under investigation.

In cases where necessary, in the interest of the investigation and resolution of the complaint, the notification of the complaint to the

persons under investigation may be delayed. In no case may the Criminal Compliance Committee issue a Resolution if the person under investigation has not previously had the opportunity to know the facts, so that he or she can make allegations and provide the documents he or she deems appropriate, which will be incorporated into the file.

8. APPROVING AND UPDATING THE POLICY

This Policy forms an integral part of the Whistleblowing Channel Regulations. This Regulation may be consulted by any interested party who requests it through the channels indicated in this document.



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