

bound4blue

# Whistleblowing Channel Policy

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## I. OBJECT AND SCOPE

### 1.1. Object

The purpose of BOUND4BLUE's Whistleblowing Channel Policy is to establish a regulatory and operational framework that allows all employees, executives, business partners, and any other interested party to safely, confidentially, and effectively report any irregularity, violation, or inappropriate behavior they detect within the scope of their professional activities related to the company. This channel is a key tool to foster an organizational culture based on ethics, transparency, and regulatory compliance, ensuring that any violations of internal or external regulations are identified and properly managed.

The Whistleblowing Channel is designed to comply with current legal regulations, such as Law 2/2023 of February 20, which governs the protection of individuals who report regulatory violations and the fight against corruption, as well as other national and international regulations aimed at protecting whistleblowers and ensuring business integrity.

BOUND4BLUE understands that early detection of irregularities through the Whistleblowing Channel is essential to mitigate legal, financial, and reputational risks. Therefore, this policy not only facilitates the reporting of misconduct but also establishes a clear process for receiving, investigating, and resolving complaints while protecting the rights of both the informant and the accused.

### 1.2. Scope

The scope of BOUND4BLUE's Whistleblowing Channel Policy is broad and encompasses all individuals interacting with the company in various capacities, including:

- **Employees and Executives:** All BOUND4BLUE employees, regardless of hierarchical level, are required to use the Whistleblowing Channel to report any detected violations or irregular behavior.

- **Board Members:** Board members must report any irregularities they detect in the performance of their duties, ensuring that their decisions align with the company's ethical and legal principles.
- **Suppliers, Contractors, and Business Partners:** Third parties in business relations with BOUND4BLUE, such as suppliers and contractors, may use the Whistleblowing Channel to report irregular or illegal practices.
- **Shareholders and Investors:** Shareholders and other investors have access to the Whistleblowing Channel to report issues affecting the company.
- **Job Candidates:** Individuals negotiating or in the pre-contractual phase with BOUND4BLUE may report irregularities even before formalizing a relationship with the company.

## II. FUNDAMENTAL PRINCIPLES OF THE CHANNEL

BOUND4BLUE's Whistleblowing Channel is governed by a set of fundamental principles designed to ensure its effectiveness, credibility, and protection for both the informant and the company. These principles are essential in fostering a culture of ethics and transparency within the organization, allowing anyone associated with the company to report misconduct or irregularities, knowing that their report will be handled fairly and confidentially.

### 2.1. Confidentiality

Confidentiality is a key pillar of the Whistleblowing Channel. This principle ensures that the identity of the informant, as well as any information provided in the report, is protected and shared only with individuals strictly necessary to carry out the investigation.

- **Identity Protection:** The informant's identity will remain strictly confidential throughout the process, unless the informant decides to reveal it or if the law requires disclosure. This protection is essential to encourage employees and other stakeholders to report without fear of retaliation.

- **Handling of Information:** All information received through the Whistleblowing Channel is handled securely and confidentially. BOUND4BLUE guarantees that the details of the report and the investigation results will not be disclosed to unauthorized persons except when required by competent authorities.

## 2.2. Accessibility

The Whistleblowing Channel must be accessible to all individuals related to BOUND4BLUE, regardless of their role or location. This principle ensures that anyone who detects an irregularity has the appropriate means to report it easily and directly, using an online form accessible from BOUND4BLUE's website. The channel is available 24/7, ensuring that reports can be submitted at any time. Continuous accessibility is crucial to ensure that reports are made as soon as an irregularity is detected. Additionally, complaints can be submitted via the following external channels:

- An external channel managed by the Independent Authority for the Protection of Whistleblowers (A.A.I.).
- Regional authorities as provided for in Law 2/2003 of February 20 regarding the protection of whistleblowers and the fight against corruption.

## 2.3. Objectivity

Objectivity in managing complaints is fundamental to ensuring that all received communications are treated impartially, without bias or favoritism. BOUND4BLUE is committed to investigating each report fairly and equitably.

- **Impartial Evaluation:** Every report is evaluated on its merits, regardless of the informant's or accused's position within the organization. Any bias that could influence the evaluation or the outcome of the investigation is avoided.
- **Independent Investigation Committee:** Reports are handled by a specialized committee that operates independently. This committee may request the collaboration of external experts to ensure that the investigation is conducted objectively and with the necessary rigor.

## 2.4. Protection Against Retaliation

To ensure that informants feel safe when reporting irregularities, BOUND4BLUE enforces a strict anti-retaliation policy. This principle ensures that no one will be penalized for filing a report in good faith.

- **Prohibition of Retaliation:** BOUND4BLUE prohibits any form of retaliation against informants, including dismissals, demotions, changes in working conditions, or any other indirect form of retaliation as a result of the report. This protection is crucial to maintaining trust in the whistleblowing system.
- **Corrective Measures:** If retaliation against an informant is detected, BOUND4BLUE will take disciplinary action against those responsible and take necessary measures to restore the informant's situation, ensuring their protection and well-being.

## III. WHO CAN USE THE CHANNEL?

BOUND4BLUE's Whistleblowing Channel is designed to be inclusive and accessible to all individuals who have some form of relationship with the company. This broad approach ensures that anyone with knowledge of a possible irregularity has the opportunity to report it, which is crucial to maintaining integrity and transparency in all of BOUND4BLUE's operations. Below is a list of who can use the channel and under what circumstances:

- 1) **Employees, Executives, and Board Members:** All BOUND4BLUE employees, regardless of their hierarchical level or seniority, have the obligation and right to use the Whistleblowing Channel to report any inappropriate behavior or irregularities they detect in the performance of their duties.
- 2) **Suppliers, Contractors, and Business Partners:** These third parties play a crucial role in the company's value chain, and by interacting directly with BOUND4BLUE's operations, they may witness practices that violate the company's policies or applicable laws.
- 3) **Shareholders and Investors:** BOUND4BLUE shareholders and investors also have the right to use the Whistleblowing Channel to report any suspicion of misconduct, financial fraud, or decisions that could jeopardize the company's value.

- 4) **Job Candidates and Consultants:** Individuals who are in the process of negotiating employment or freelance contracts with BOUND4BLUE may also use the channel to report any unethical or inappropriate practices they detect.
- 5) **Volunteers and Interns:** Temporary collaborators such as volunteers and interns are given access to the channel as their participation in specific projects may give them a unique perspective from which they can detect potential irregularities.
- 6) **Former Employees:** Even individuals who have previously worked for the company have access to the Whistleblowing Channel, ensuring that any knowledge of irregularities acquired during their time at the company can be reported, even after the employment relationship has ended.

#### IV. WHAT CAN BE REPORTED?

BOUND4BLUE's Whistleblowing Channel is designed to enable the communication of a wide range of irregularities and inappropriate conduct that could affect the company's integrity and its compliance with legal and ethical standards. Below are the main categories of complaints that can be submitted through this channel:

##### 4.1. Violations of National and International Regulations

The channel is open to receive reports of any violations of the current legal regulations, both at the national and international levels. This includes:

- **Violations of National Laws:** Any action or omission that breaches the laws of the country where BOUND4BLUE operates. This can range from violations of labor laws to non-compliance with workplace health and safety regulations.
- **Infringement of International Regulations:** Given that BOUND4BLUE operates in a global environment, it is essential to comply with international regulations. This includes standards on international trade, human rights, and international environmental agreements. Any non-compliance with these legal frameworks should be reported through the Whistleblowing Channel.



## 4.2. Commission of Crimes

The Whistleblowing Channel is an essential tool for reporting crimes within the organization or related to BOUND4BLUE's activities. Crimes that must be reported include:

- **Corruption and Bribery:** Any attempt to influence business decisions through improper payments or the offering of personal benefits must be immediately reported. This includes both active (offered) and passive (accepted) bribes.
- **Fraud:** This includes the manipulation of financial information, falsification of documents, or any action aimed at deceiving the company or its business partners to obtain undue economic or material benefits.
- **Crimes Against Intellectual Property:** Violations of intellectual property rights, such as unauthorized copying of technologies or the disclosure of trade secrets, must also be reported.

## 4.3. Serious or very serious Administrative Offenses

Administrative offenses that can be reported include those that violate BOUND4BLUE's internal regulations or constitute a serious breach of applicable administrative regulations governing the company's operations. Examples of such offenses include:

- **Non-compliance with Internal Policies:** If an employee or executive does not comply with BOUND4BLUE's established policies and procedures, such as codes of conduct or anti-corruption policies, this must be reported. These violations can include anything from failing to adhere to safety standards to not following hiring protocols.
- **Violations of Industry Regulations:** In highly regulated sectors, such as the maritime and renewable energy industries where BOUND4BLUE operates, it is crucial to comply with specific sectoral regulations. Any breach of these regulations, such as failing to comply with environmental or safety regulations, must be reported.
- **Non-compliance with Internal Audits and Controls:** If it is detected that an area of the company is not complying with internal controls or has manipulated the results of an internal audit, this behavior must be reported.

#### 4.4. Irregular or Unethical Practices

The channel is also enabled to receive reports on irregular practices, which, although not illegal, are contrary to BOUND4BLUE's values and ethical principles. These practices may include:

- **Conflicts of Interest:** Any situation where an employee or executive has personal or financial interests that could influence their decisions to the detriment of the company must be reported. This is crucial to ensuring that business decisions are made impartially and in the best interest of BOUND4BLUE.
- **Abuse of Power or Authority:** If a manager or supervisor is using their position to obtain personal benefits or exert undue pressure on other employees, this behavior must be reported. Abuse of power can manifest in forms such as favoritism, harassment, or coercion to obtain inappropriate results.
- **Discrimination and Harassment:** Any conduct that constitutes discrimination based on gender, race, sexual orientation, religion, or any other protected characteristic, as well as any form of workplace harassment, must be reported through the Whistleblowing Channel.

#### 4.5. Misuse of Company Resources

The Whistleblowing Channel can also be used to report the misuse of BOUND4BLUE's resources. This includes:

- **Misuse of Company Assets:** Any unauthorized or inappropriate use of the company's physical or intellectual assets, such as vehicles, equipment, software, or intellectual property, must be reported.
- **Misappropriation of Financial Resources:** The improper allocation of financial resources, such as using company funds for personal or unauthorized purposes, must also be reported.

## V. PROCEDURE

The procedure for filing complaints with BOUND4BLUE is designed to be simple, secure, and accessible, allowing anyone associated with the company to report irregularities efficiently and without fear of retaliation.

### 5.1. Submission Methods

BOUND4BLUE offers several methods for submitting complaints, ensuring that all informants can choose the option that best suits their needs and preferences. These methods include:

- **Online Form:** A secure and confidential form is available on BOUND4BLUE's website, accessible 24/7. This form allows informants to provide details of the detected irregularity and attach any relevant evidence.

### 5.2. Types of Reports: Anonymous and Named

BOUND4BLUE allows both anonymous and named reports, offering flexibility and security to the informant:

- **Anonymous Reports:** In situations where the informant prefers not to reveal their identity, anonymous reports are allowed. Although the identification of the informant is not required, it is crucial that the information provided is detailed enough to allow an effective investigation.
- **Named Reports:** Informants can also choose to provide their name and contact details, facilitating communication during the investigation. This allows for a more direct dialogue and exchange of additional information if necessary. BOUND4BLUE ensures that the identity of the informant will be protected and kept confidential unless required by law.

### 5.3. Content of the Report

For a report to be effective, it is crucial that the informant provides detailed and accurate information. The essential elements that should be included in the report are:

- **Description of the Irregularity:** A clear and detailed summary of the behavior or situation considered inappropriate or illegal, including the facts, names of those involved, and any relevant circumstances.
- **Dates and Locations:** The informant should specify when and where the events occurred, as this will help contextualize the report and guide the investigation.
- **Evidence:** Any document, email, photograph, or other form of evidence supporting the report should be included. Providing solid evidence enhances BOUND4BLUE's ability to investigate and address the issue effectively.
- **Witnesses:** If there are other individuals who witnessed the events or can provide relevant information, their names and contact details (if appropriate) should be included in the report.

## VI. RIGHTS OF THE INFORMANT AND THE ACCUSED

The protection of the rights of all parties involved in a report is a fundamental principle in the management of BOUND4BLUE's Whistleblowing Channel. Both the informant and the accused have specific rights that must be respected throughout the investigation process. These rights are designed to ensure that the process is fair, transparent, and that the integrity and dignity of all individuals involved are safeguarded.

### 6.1. Rights of the Informant

The informant is the person who reports an irregularity or inappropriate behavior through the Whistleblowing Channel. To promote a culture of transparency and ensure that informants feel safe in making a report, BOUND4BLUE is committed to protecting the following rights:

- **Protection Against Retaliation:** One of the most important rights of the informant is protection against any form of retaliation. This includes any negative action the company or its employees might take in response to the report, such as dismissals, demotions, unjustified changes in working conditions, or any other form of punishment. BOUND4BLUE guarantees that no informant will be penalized for submitting a report made in good faith.
- **Absolute Confidentiality:** The informant's identity will be protected at all times. It will only be disclosed if the informant explicitly authorizes it or if required by law

(for example, in a legal process). This confidentiality also extends to the information provided in the report, which will be handled with the highest level of security.

- **Right to Honor and Reputation:** The informant has the right to have their integrity and reputation respected throughout the process. This means that any communication related to the report must be handled in a way that does not damage the informant's image or reputation.
- **Right to Information:** The informant has the right to be informed about the status of the investigation and its final conclusions, as long as the report is not anonymous. BOUND4BLUE will provide regular updates and a final notification detailing the investigation's outcome and any actions taken.

## 6.2. Rights of the Accused

The accused is the person or persons against whom the report has been made. The rights of the accused must be respected to ensure a fair and equitable process. BOUND4BLUE guarantees the following rights for the accused:

- **Presumption of Innocence:** The accused has the right to be considered innocent until proven otherwise. The investigation must be conducted objectively, without bias or assumptions of guilt.
- **Right to Be Informed:** The accused has the right to be informed of the allegations made against them at an appropriate time during the process. This information should include the details of the report and the nature of the investigation. However, the communication of this information will be managed in such a way that it does not compromise the integrity of the investigation.
- **Right to Defense:** The accused has the right to present their defense, which includes the opportunity to provide their version of events, submit exculpatory evidence, and make arguments that may influence the outcome of the investigation. This right is essential to ensure that the investigation is thorough and fair.
- **Right to Confidentiality:** Like the informant, the accused has the right to confidentiality. Information related to the report and the identity of the accused will be handled discreetly and only shared with those necessary for the investigation.

- **Right to Honor and Reputation:** BOUND4BLUE ensures that the investigation process will not compromise the dignity or reputation of the accused. Any communication related to the report must be treated with sensitivity to avoid unnecessary damage to the accused's image.
- **Right to Know the Outcome of the Investigation:** Once the investigation is complete, the accused has the right to be informed of the conclusions and any measures that have been decided upon. This includes the right to receive an explanation of how the conclusions were reached.

## VII. PROTECTION OF THE INFORMANT AND GUARANTEES

The protection of the informant is a central element of BOUND4BLUE's Whistleblowing Channel Policy. BOUND4BLUE is committed to providing a safe and supportive environment for anyone who decides to report inappropriate or illegal behavior. The guarantees offered are designed to ensure that informants not only feel supported in reporting irregularities but also to protect their personal, professional, and legal integrity. To this end, BOUND4BLUE commits to:

- **Prohibiting Retaliation and Protecting the Informant:** Strict measures will be taken to prevent any form of retaliation against informants.
- **Guaranteeing Confidentiality:** Ensuring that informants feel comfortable making reports without fear of their identity being disclosed.
- **Ensuring a Fair Process for All Involved:** Both the informant and the accused will be afforded fairness throughout the process.

## VIII. BAD FAITH COMMUNICATIONS

A report or communication made in "bad faith" may be subject to disciplinary sanctions for members of BOUND4BLUE. In cases where a bad faith report or communication is made by business partners, this may lead to the legal and contractual consequences foreseen in each case.

**IX. RECORD OF COMMUNICATIONS RECEIVED**

BOUND4BLUE will maintain a record of the communications received through the Whistleblowing Channel, ensuring confidentiality and data protection at all times.