

WHISTLEBLOWING POLICY

HORSAN BROKERS COMPANY SL

Registered Office: Calle Campoamor, 28 - Piso 1, Castellón de la Plana, Spain

Version 1.0 | Effective Date: 20 April 2026 | Approved by: Board of Directors

1. Purpose

HORSAN BROKERS COMPANY SL is committed to the highest standards of openness, integrity and accountability. This Policy establishes a formal mechanism through which employees and third parties may raise concerns about suspected wrongdoing in good faith, without fear of retaliation.

The Policy is aligned with Spanish Law 2/2023 of 20 February, regulating the protection of persons who report regulatory breaches and the fight against corruption, as well as with EU Directive 2019/1937 on the protection of persons who report breaches of Union law.

2. Scope

This Policy applies to all directors, officers, employees (current and former), shareholders, agents, contractors, suppliers, consultants, interns and any third party having a work-related relationship with the Company.

3. What Can Be Reported

Reportable concerns include any actual, attempted or suspected:

- Bribery, corruption, kickbacks or improper payments.
- Fraud, embezzlement or theft.
- Money laundering or financing of terrorism.
- Breach of trade sanctions.
- Conflicts of interest.
- Breach of the Code of Conduct or any Company policy.
- Breach of applicable laws or regulations.
- Accounting, auditing or financial reporting irregularities.
- Serious health, safety or environmental risks.
- Harassment, discrimination or retaliation.
- Data protection or cybersecurity breaches.
- Any other serious misconduct affecting the Company or its stakeholders.

4. How to Report a Concern

Concerns may be reported through any of the following channels:

4.1 Internal Reporting Channel

- **Email:** compliance@horsanbrokers.com
- **Postal mail:** Compliance Officer — HORSAN BROKERS COMPANY SL, Calle Campoamor, 28 - Piso 1, Castellón de la Plana, Spain, marked "Private & Confidential".
- **In-person meeting:** by request to the Compliance Officer.

The reporter may choose to report anonymously or identified. Anonymous reports are processed with the same diligence, provided they contain sufficient information to allow investigation.

4.2 External Reporting Channel

Reporters may also report directly to the Spanish Independent Authority for the Protection of Whistleblowers (Autoridad Independiente de Protección del Informante, A.A.I.) or to the competent authority in the relevant jurisdiction.

5. Confidentiality

The Company treats all reports with the strictest confidentiality. The identity of the reporter and any person mentioned in the report will not be disclosed without the reporter's express consent, except where disclosure is required by law or to conduct the investigation.

Access to information relating to a report is restricted to persons strictly involved in handling it.

6. Non-Retaliation

The Company strictly prohibits retaliation, in any form, against any person who reports a concern in good faith or cooperates in an investigation. Protected persons include the reporter, their colleagues, relatives and any legal entity they are associated with.

Retaliation includes dismissal, demotion, disciplinary action, harassment, discrimination, denial of training or promotion, or any other adverse measure. Any act of retaliation will itself be investigated and sanctioned under this Policy.

7. Handling of Reports

7.1 Acknowledgment

The reporter receives acknowledgment of receipt within 7 calendar days, unless anonymity prevents this.

7.2 Assessment

The Compliance Officer performs an initial assessment to determine whether the report falls within the scope of this Policy and whether further investigation is warranted.

7.3 Investigation

Where investigation is warranted, a competent and impartial person or team is appointed. Investigations are conducted fairly, objectively and in compliance with applicable law, including rights of defence and data protection.

7.4 Response to Reporter

The reporter is informed of the outcome and any action taken within three months of acknowledgment, or six months in duly justified cases.

7.5 Closure and Record-Keeping

All reports and related documentation are recorded in a secure log maintained by the Compliance Officer. Records are retained only for as long as necessary and in compliance with data protection legislation.

8. Governance

The Compliance Officer manages the internal reporting channel with operational independence and reports directly to the Board of Directors. The Board receives at least an annual summary of reports received, investigations conducted and actions taken.

9. False or Malicious Reports

Reports made in good faith, even if not ultimately substantiated, are protected under this Policy. However, knowingly false or malicious reports may result in disciplinary action and, where appropriate, civil or criminal liability.

10. Data Protection

All personal data processed under this Policy is handled in accordance with Regulation (EU) 2016/679 (GDPR) and Spanish Organic Law 3/2018. Data is processed only to the extent necessary to manage reports and conduct investigations.

11. Training and Awareness

The Company provides training to all employees on this Policy and ensures that the reporting channels are accessible, visible and publicised internally.

12. Review

This Policy is reviewed at least every three years, and whenever there is a material change in applicable legislation or in the Company's operations.

Approval and Sign-Off

This Policy has been reviewed, approved and adopted by the Board of Directors of HORSAN BROKERS COMPANY SL and is effective as of 20 April 2026.

Javier Sánchez
Chief Executive Officer / Administrador Único
HORSAN BROKERS COMPANY SL
Date: 20 April 2026

