

Ethics and Compliance Channel Policy



OBJECTIVE

The purpose of this Policy is to **detail the principles of action that govern the management and use of the Ethics and Compliance Channel and the management of any investigations that may arise from it.**



OUR COMMITMENTS

- **Make the Ethics and Compliance Channel available to our employees, suppliers, partners, customers and other stakeholders** to inform the Company's managers of **any possible breach** or misconduct by any employee or third party representing Cepsa that could damage its reputation or business continuity.
- **Maintain this communication channel active as a fundamental pillar of its sustainability**, which is managed by the Ethics and Compliance Office under the supervision of the Audit, Compliance, Ethics and Risk Committee, delegated by the Board of Directors.
- **Ensuring the integrity of the Company is the responsibility of our employees.** When we detect a possible non-compliance with ethics or internal or external rules, these have an obligation to report it as promptly as possible through the available channels.
- **Protect the bona fide complainant or collaborator in the investigation process from any possible retaliation.** A complaint or provision of information "in bad faith" is subject to disciplinary measures.
- Not tolerate **any form of retaliation directed against anyone who, in good faith, raises a concern about a possible breach of the Code of Ethics and Conduct** or internal or external regulations; or against anyone who cooperates in an investigation of a breach. Any act or threat of retaliation against an employee is subject to disciplinary action.
- To guarantee our **commitment to the confidentiality of the whistleblower's data.** Persons who need to know its contents are subject to a confidentiality commitment. A whistleblower's details can only be furnished in the event of legal requirement and at the request of the competent authority, at all times complying with personal data protection legislation.
- Analyze all complaints and inquiries received and, depending on the outcome, **the Ethics and Compliance Office may initiate an investigative procedure to clarify the events that have occurred.** Complaints will be handled in the channel in accordance with the deadlines required by current legislation.
- **Perform all actions deemed appropriate for determining and resolving the alleged non-compliance reported** and for obtaining the documents needed to have sufficient evidence, based on the principle of proportionality.
- **Proactively collaborating with investigations is the responsibility of our employees** by providing truthful, clear and complete information, and our basic principles and responsibilities in the development of investigations are confidentiality and cooperation.
- Maintain an updated record, in accordance with current legislation, of **all ethical interpretation or compliance queries**, of complaints arising from non-compliance and of the resolution of such complaints with the corrective measures or disciplinary actions taken.
- **Collaborate in good faith and proactively with the investigations and audits that are carried out, as well as the duty to inform the Ethics and Compliance Office of any suspected or actual breach of our ethical principles or applicable regulations**, which may result in criminal sanctions. To this end, we have internal channels developed for this purpose to communicate possible irregularities with the Audit, Compliance, and Ethics Committee of the Board of Directors, including the Ethics and Compliance Channel (canaletica@cepsa.com).

Scope de application

This Policy applies to Cepsa, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy.