



Internal Information System (Whistleblowing Channel) - RDT GROUP

In compliance with **Law 2/2023 on the protection of persons reporting regulatory infringements and the fight against corruption**, RDT GROUP makes the present Internal Information System available to all stakeholders.

1. Purpose and Objective

The main objective of this system is the early detection of irregularities and the promotion of an ethical culture within the organization.

Its purpose is to establish a secure, independent, confidential, and effective mechanism for the receipt, management, investigation, and resolution of reports concerning possible regulatory infringements, conduct contrary to the Code of Ethics, internal non-compliance, or acts that may give rise to administrative, civil, or criminal liability for the organization through the Whistleblowing Channel.

2. Scope of Application

This channel is available to any person who maintains or has maintained a professional relationship with RDT GROUP, including:

- Employees, managers, and directors.
- Suppliers, contractors, and external collaborators.
- Job applicants, former employees, and former collaborators.

3. Reportable and Non-Reportable Matters

- **Reportable Matters:** Economic crimes, fraud, corruption, conflicts of interest, workplace or sexual harassment, data protection breaches, environmental infringements, and any violation of the Code of Ethics.
- **Non-Reportable Matters:** Commercial complaints, routine employment-related queries (such as holidays or payroll matters), personal disputes without regulatory implications, and suggestions for improvement. These matters should be addressed through the appropriate departments.

4. Reporting Channels

Reports may be submitted either anonymously or with identification through the following channels:



- **Email:** compliance@rdtengineers.com
- **Postal Mail:** Internal Information System Officer – RDT GROUP (Parque Tecnológico de Zamudio, Building 103 Ground Floor, 48170 Zamudio, Bizkaia, Spain).
- **In-Person Meeting:** Upon request by the reporting person, to be held within a maximum period of seven days.

5. Guarantees and Protection of Reporting Persons

The cornerstone of the system is absolute protection against retaliation. As detailed in the **WHISTLEBLOWING CHANNEL** policy:

“RDT GROUP guarantees that any person who, in good faith, reports information concerning potential regulatory infringements or internal non-compliance will be protected against any form of retaliation, discrimination, or adverse treatment resulting from such report. This protection shall apply both during the investigation process and after its conclusion.”

6. Procedure and Timeframes

- **Acknowledgement of Receipt:** Within a maximum period of 7 calendar days.
- **Admissibility Assessment:** Preliminary review within a maximum period of 30 days.
- **Investigation:** Conducted by the Internal Information System Officer, always ensuring the presumption of innocence and the right of defence of the persons concerned.
- **Resolution:** The maximum period for concluding the proceedings is 3 months, which may be extended for an additional 3 months in particularly complex cases.

7. Data Protection and Confidentiality

The system guarantees the utmost confidentiality regarding the identity of the reporting person and the individuals concerned. Personal data will be processed in accordance with the General Data Protection Regulation (GDPR) and applicable data protection legislation, and will be retained only for the period strictly necessary to conduct the investigation and comply with legal obligations.

Signed, RDT People Department