



INTERNAL INFORMATION SYSTEM POLICY



DOCUMENT PROPERTIES

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INTERNAL INFORMATION SYSTEM POLICY

ALFARIVER DEFENSE, S.L. (hereinafter "**ALFARIVER DEFENSE**" or "the Organization") has an Internal Information System or Ethical Channel, designed and implemented in accordance with the requirements of the *Law 2/2023, regulating the protection of persons who report breaches of regulations and the fight against corruption*.

The Internal Reporting System is enabled to report, **in a secure and confidential manner**, even **anonymously**, the actions or omissions provided for in Article 2 of the aforementioned Law (serious or very serious offences or infringements).

The Organization is committed to **protecting individuals making such communications** by ensuring, at all times, that communications **handled expeditiously** and that the following safeguards are respected:

- **Confidentiality** of all persons involved in a communication, as well as of all actions carried out in its processing.
- Possibility to communicate **anonymously**.
- **No retaliation** against people who report in good faith.
- Processing of **personal data** in accordance with **current legislation**.
- **The right to the presumption of innocence** and the right of **defense** of the person affected by communication.

The Internal Information System of **ALFARIVER DEFENSE**, accessible on the corporate website, consists of the following **elements**:

- **Internal Information System Policy**.
- **System Manager**.
- **Internal Channel** (Ethical Channel) is the preferred channel for communications.
- Access to the **External Channel** managed by the regional and/or national Independent Authorities.
- **Internal Information System Management Procedure**: which regulates, in detail, the operation of the System.

Failure to comply with any internal rules is a punishable offence. Therefore, non-compliance with policies or procedures implemented in relation to the Internal Reporting System may be subject to disciplinary measures reasonable and proportionate in accordance with applicable sanctioning regimes.