

## MANAGEMENT PROCEDURE OF THE INTERNAL INFORMATION SYSTEM

QUBE GROUP has implemented an Internal Information System, hereinafter IIS or Information Channel, with the purpose of ensuring the effectiveness of the Code of Ethics, to which it is accessed through the Group's website ([www.qubepharmagroup.com](http://www.qubepharmagroup.com)) or through the corporate website of each of the companies that make up QUBE GROUP. It has also the purpose of ensuring the effectiveness of the rest of the internal regulations relating to supervision, surveillance and control for the prevention of criminal risks and situations and conduct contrary to legal norms applicable to the Group and its internal regulations.

This Information System, which is constituted as a tool available to all employees of the QUBE GROUP as well as third parties who in any way collaborate with the organization, it is designed, established and managed in a securely, so that the confidentiality of the identity of the informant and any third party mentioned in the communication, is guaranteed.

The Channel is accessible through the corporate website <https://qubepharmagroup.com> to which the rest of the domains of the QUBE GROUP companies refer.

Anyone wishing to make any communication may do so, even anonymously, by any of the means offered by GRUPO QUBE's internal information system, which are specified in the following:

- By writing to the email address expressly enabled for this purpose. at the address: [complianceofficer@qubepharmagroup.com](mailto:complianceofficer@qubepharmagroup.com), or via postal mail to the attention of the Compliance Officer at the address Avenida Baja Navarra 1, 4º E, 31002, Pamplona (Navarra).
- In the case of employees, through a written or verbal report to their superior hierarchical, who will transfer it to the Group Compliance Officer.
- Requesting a face-to-face meeting that must take place within the maximum period of seven days from the request.

In the event that the communication is made verbally, including those made via telephone or through a voice messaging system, this will be documented by means of recording, prior warning to the informant, or transcription, giving the possibility to the informant to review and validate such transcription.

In all communications, the confidentiality of the identity of the informant is guaranteed, as well as any third party mentioned in the communication and of the actions that are

developed in the management and transmission of communications, as well as protection of data, preventing access by unauthorized personnel, however, the presentation of anonymous communications is permitted.

Likewise, confidentiality is guaranteed when the communication is sent through channels other than those established or to staff members not responsible for their treatment, which is why the staff is duly informed on this matter and will immediately refer it to the Compliance officer.

Likewise, you may be informed of the regulatory breaches referred to in the Law 2/2023 before the Independent Authority for the Protection of Informants (A.A.I.) or before the corresponding authorities or autonomous bodies, with internal communication to the organization as the preferred way to report this type of infractions, provided that can be dealt with effectively and there is no risk of retaliation.

QUBE GROUP has a Management Procedure for the Internal Control System Information that describes in detail the procedure to follow from that the information is received until, where appropriate, the appropriate measures are adopted in response to it, in case it constitutes an assumption of regulatory non-compliance.

The provisions of said Procedure respect, in any case, the guarantees of protection of informants in accordance with the provisions of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of people who report violations of Union Law, Law 2/2023, of February 20, regulating the protection of people who report on regulatory infractions and the fight against corruption, as well as the provisions of the regulations regarding the protection of personal data.

The body responsible within the Organization for managing the operation of the IIS, as well as the receipt of information about the possible commission of an action illegal, irregular or improper act committed within the Organization and the subsequent processing of the investigation file, is the Compliance Officer, who will inform periodically to the Governing Body about the information received, being ultimately responsible for making decisions on the resolution of the information received.

The IIS of GRUPO QUBE reaffirms the commitment acquired by it that all illegal activity by the Organization or any of its directors, employees, or third parties who in any way collaborate with the Organization will be strictly investigated, adopting the measures that in accordance with the internal and external regulations are appropriate.