

APPLICABLE PROCEDURES FOR REPORTING AND INVESTIGATING IRREGULARITIES

REN GROUP

REN 

Considering that:

- A. REN operates in the capital market and complies in appropriate and strict terms with high standards of good corporate governance, stipulated in the applicable legislation and in the recommendations of the Portuguese Institute of Corporate Governance (“**IPCG**”).
- B. Pursuant to paragraph 1.2.4. of IPCG Corporate Governance Code 2018 (“*Código de Governo das Sociedades de 2018 do IPCG*”), as revised in 2020, the IPCG recommends that companies adopt a policy for communications regarding irregularities allegedly occurring within the company, which ensures the appropriate means for communicating and processing such communications, safeguarding the confidentiality of the information communicated and the identity of the person communicating it, whenever this is requested.
- C. The entry into force of the General Regime for the Protection of Whistleblowers, approved by Law No. 93/2021, of 20 December, and of the General Regime for the Prevention of Corruption, of 9 December, requires the implementation of whistleblower channels, which must comply with the requirements set out in the aforementioned legal diplomas.
- D. REN undertakes to comply with all applicable legal provisions regarding the protection of whistleblowers of irregularities.
- E. The Audit Committee of REN - REDES ENERGÉTICAS NACIONAIS, SGPS, S.A., as a body monitoring corporate activities, has sought to contribute actively to ensure that REN Group complies with the applicable market standards and rules, by effectively performing its functions. This encompasses four essential dimensions of corporate supervision: (i) supervising corporate activities, (ii) monitoring financial information, (iii) supervising internal risk management, internal audit and monitoring systems and (iv) receiving and processing reports of irregularities.
- F. In the context of its activities of receiving and processing reports of irregularities, as provided for in the General Regime for the Protection of Whistleblowers, in the General Regime for the Prevention of Corruption, in Article 423-F(1)(j) of the Portuguese Companies Code and in the Regulations of the Audit Committee, REN Group and, in particular, the Audit Committee considered it convenient to define rules creating legal certainty and security with regard to the terms for receiving and processing reports of irregularities submitted by shareholders, members of corporate bodies, managers, directors, senior officials, employees, service providers, suppliers, contractors, subcontractors, volunteers, interns, clients or other stakeholders of REN or REN Group companies or third parties, regardless of whether the reports are based on information obtained in a professional relationship that has since ended, as well as during the recruitment process or during another phase of pre-contractual negotiation of an established or not constituted professional relationship (“**Whistleblowers**”), with the following elements: (i) an indication of the means by which the commission of irregular practices can be reported internally, including the persons authorised to receive reports and (ii) an indication of the way the reports will be processed.

The Board of Directors of each company of the REN Group approved, based on a proposal submitted by the Audit Committee of REN - REDES ENERGÉTICAS NACIONAIS, SGPS, S.A., this document regarding the procedures applicable to receiving and processing reports of Irregularities submitted by Whistleblowers and to investigating whether Irregularities actually exist and how they should be remedied (“**Procedure**”).

I. Definitions

For the purposes of this Procedure, the following terms and expressions have the following meaning, when beginning with a capital letter, unless the context clearly requires otherwise:

Perpetrator of the Irregularity: has the meaning given to it by section VI(1) of this Procedure;

Audit Committee: means the Audit Committee of REN - REDES ENERGÉTICAS NACIONAIS, SGPS, S.A.

Personal Data: has the meaning ascribed to it by Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the “General Data Protection Regulation”), i.e., any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Report: means the communication or public disclosure of any Irregularity.

Whistleblowers: has the meaning given to it in Recital F;

Group or REN or REN Group: has the meaning given to it in the Code of Conduct;

Irregularity: has the meaning given to it by section VI;

Remedy Measures: has the meaning given to it by Section VIII(15)(iii);

Procedure: means this document regarding the procedures applicable to receiving and processing reports of Irregularities submitted by Whistleblowers and to investigating whether Irregularities actually exist and how they can be remedied;

Processor: has the meaning given to it in section VIII(1);

Investigation Process: has the meaning given to it in section VIII(15) (i);

Final Report: has the meaning given to it in section IX(6)(iv);

Preliminary Report: has the meaning given to it in section VIII(13);

Process Manager: has the meaning given to it in section IX(1);

Regulatory Compliance Officer: has the meaning given to it in the Integrity Policy;

System: has the meaning given to it in section III;

II. Powers to receive, record and process Reports

1. According to the functions granted to it under the law, REN's Articles of Association and internal Regulations, the Audit Committee is responsible for receiving, recording and processing reports with indications of Irregularities occurring at the REN Group, as well as the practice of other acts that, in accordance with these powers, are necessarily related.
2. While performing the functions mentioned in paragraph 1 above, the Audit Committee will have the support of one member of its secretarial staff.

III. Purpose

This Procedure establishes a set of rules and internal procedures which constitute the system for receiving, processing and handling reports of Irregularities occurring at REN Group, submitted by Whistleblowers, and subsequent procedures to detect Irregularities by the Audit Committee, and to remedy them ("**System**").

This Procedure is attached to the REN Code of Conduct as its Annex B), and forms an integral part thereof, so it must be read in conjunction with it.

IV. System

1. The System established in this Procedure is intended to ensure the existence of conditions to detect in a timely manner any irregular situations which could cause adverse effects to the REN Group, with a view to remedying those situations. It is also intended to ensure the protection of Whistleblowers, who publicly report or disclose an Irregularity, in good faith, and having serious grounds to believe that the information is true at the time of the report or public disclosure.
2. Access to any component of the System is limited to staff specifically authorised by REN's Audit Committee, insofar as is strictly necessary for the System to operate efficiently.
3. Personal Data collected through the System will be processed by REN - Redes Energéticas Nacionais, SGPS, S.A., legal entity number 503264032, with registered offices at Avenida dos Estados Unidos da América, no. 55, 1749-061 Lisbon, or by a company directly or indirectly controlled by it, which is the entity responsible for the processing within the meaning of the General Data Protection Regulation. This processing may have various grounds of lawfulness, as applicable, such as compliance with legal obligations that bind the controller, the pursuit of legitimate interests by the controller or consent of the Whistleblowers. In any case, all applicable legal provisions regarding the processing of personal data shall be observed, namely, under the General Data Protection Regulation and other applicable European and national legislation, including Law No. 58/2019, of 8 August, ensuring the implementation, in the Portuguese legal system, of the General Data Protection Regulation, and Law No. 59/2019, of 8 August, adopting the rules on the processing of personal data for the purpose of preventing, detecting, investigating or prosecuting criminal offences or the execution of criminal sanctions.
4. Where it is necessary to obtain the consent of data subjects for the processing of personal data, the Processor

shall identify the personal data to be processed and seek consent from the Whistleblowers to proceed with the processing. The Controller shall keep evidence of the consent.

5. In accordance with Article 28 of the General Data Protection Regulation, the Controller shall only use processors, for the analysis of the Irregularity, which provide sufficient guarantees to implement appropriate technical and organisational measures to meet the requirements of the General Data Protection Regulation.
6. Personal Data that is clearly not relevant for the purposes pursued by the System must not be collected. If inadvertently collected, they must be deleted without undue delay.
7. The provisions of paragraph 6 of this section IV do not prejudice the duty to preserve reports provided for in section XIII.

V. Duty of confidentiality

1. Members of the Audit Committee and the member of the secretarial staff mentioned in section II(2) are bound to maintain confidentiality with regard to the facts and information that they become aware while performing their duties under this Procedure, without prejudice to compliance with the legal provisions to which they are subject.
2. The identity of the Whistleblower, as well as the information that, directly or indirectly, makes it possible to deduce his/her identity, are confidential and are of restricted access to the persons responsible for receiving or following up on the reports, under the terms of this Procedure.
3. The identity of the Whistleblower shall only be disclosed as a result of a legal obligation or court decision. In these cases, the disclosure of the information is preceded by a written communication to the Whistleblower indicating the reasons for disclosing the confidential data in question, unless the provision of this information compromises the investigations or related legal proceedings.
4. The duty of confidentiality extends to anyone who has received information about Reports, even if they are not responsible or incompetent for their reception and processing.
5. All reports regarding Irregularities will be treated as confidential, under the provisions of this Procedure and, in particular, section XV.
6. When requested by the Whistleblower, the person's identification may be included in the report of an Irregularity, but this identification shall only be disclosed for the purposes of investigation measures, in the event that the Whistleblower expressly gives his/her consent for this purpose.

VI. Concept of "Irregularity"

1. For the purposes of this Procedure, Irregularities are considered to be any situation that any Whistleblower detects, is aware of or has well-founded doubts about the commission of any illicit acts, infractions or irregularities relating to violations of the law, statutory, ethical or professional ethics standards, including those contained in the REN Group Code of Conduct and the REN Group Integrity Policy, or any standards contained in any internal documents or regulations, recommendations or guidelines applicable to REN, or

any REN Group company, concerning:

- (i) acts or omissions;
- (ii) documentation, in a physical or electronic format;
- (iii) decisions, orders, guidelines, recommendations, opinions and press releases;

done, issued or prepared by shareholders, members of corporate bodies, any manager, director, senior officials, employee, service provider, client, partner, consultant, supplier or collaborator of the REN Group (“**Perpetrator of the Irregularity**”), due to or within the context of their duties.

2. The report or public disclosure can be based on the Irregularities committed, which are being committed or whose commission can reasonably be foreseen, as well as attempts to conceal such Irregularities.
3. Irregularities which can be reported under this Procedure are understood to be those which could result in illegal acts which constitute criminal, civil or administrative offences or which are related to:
 - (i) public procurement;
 - (ii) financial services, products and markets, and the prevention of money laundering and terrorist financing;
 - (iii) product safety and compliance;
 - (iv) transport security;
 - (v) environmental protection;
 - (vi) protection against radiation and nuclear safety;
 - (vii) food and feed security, animal health and animal welfare;
 - (viii) public health;
 - (ix) consumer protection;
 - (x) protection of privacy and personal data and security of information network and systems;
 - (xi) any accounting and financial matters, including acts or omission harmful to the financial interests of the European Union;
 - (xii) the rules of the internal market, including competition and state aid rules, as well as corporate tax rules;
 - (xiii) the internal risk management system;
 - (xiv) supervisory activities performed at REN or at any of the REN Group’s companies.

VII. Reporting of Irregularities

1. Reporting of Irregularities must be made voluntarily by the Whistleblowers, verbally or in writing, and contain the elements and information necessary to assess the Irregularity. As far as possible, the Whistleblower must

identify the company(ies) of the REN Group to which the Irregularity refers.

2. Reports may be anonymous or with identification of the Whistleblower.
3. Reports can be made through the following channels:
 - Email: comissao.auditoria@ren.pt*
 - Telephone: 210013511*
4. Verbal reports can be made by telephone or through voice message systems, and, at the request of the Whistleblower, at a presential meeting.
5. The Report may be submitted using electronic authentication means using an identification card (*cartão de cidadão*) or digital mobile key, or using other commonly accepted means of electronic identification.
6. Any communication of an Irregularity received through the email address in paragraph 3 above is automatically encrypted, so as to protect the identity of the Whistleblower.
7. The REN Group's whistleblower channel allows the safe presentation and follow-up of Whistleblowers, in order to guarantee the completeness, integrity and preservation of the report, the confidentiality of the identity or anonymity of Whistleblowers and the confidentiality of the identity of third parties mentioned in the Report, preventing access by unauthorised persons.
8. As set out in article 7 of Law 93/2021, in order to benefit from the guarantees provided for in this Procedure, the Whistleblower may only use external reporting channels (i.e. reporting to the public competent authorities) when:
 - (i) there is no internal reporting channel;
 - (ii) the internal reporting channel only admits the submission of Reports by employees, and the Whistleblower is not an employee;
 - (iii) has reasonable grounds to believe that the Irregularity cannot be effectively known or resolved internally or that there is a risk of retaliation;
 - (iv) has initially filed an internal Report without having been informed of the measures envisaged or adopted following the Report within the deadlines defined in this Procedure; or
 - (v) the Irregularity constitutes a crime or administrative offence punishable by a fine of more than €50,000.00.
9. In order to benefit from the guarantees provided for in this Procedure, the Whistleblower may only publicly disclose an infraction when:
 - (i) has reasonable grounds to believe that the Irregularity may constitute an imminent or manifest danger to the public interest, that the Irregularity cannot be effectively known or resolved by the competent authorities, given the specific circumstances of the case, or that there is a risk of retaliation even in the case of external reporting; or
 - (ii) has filed an internal report and an external report, or directly an external report, under the terms set out in paragraph 8 of this section, without adequate measures having been taken within the time limits provided for in this Procedure.
10. The Whistleblowers and the Perpetrator of the Irregularity are guaranteed the right to information, access, erasure and rectification of their Personal Data, except insofar as the exercise of these rights may conflict with other rights that must prevail, with compliance with legal obligations or legitimate orders from the authorities, or may hinder the effectiveness of the assessment procedures that are underway. Under no

circumstances may the identity of the Whistleblower at the origin of the Irregularity be disclosed to the Perpetrator of the Irregularity, unless authorised by the Whistleblower.

11. The rights referred to in the preceding paragraph may be exercised under the terms of paragraph 2 of this section. Personal Data subjects also have the right to file a complaint with the National Commission for Data Protection, and may do so through the website <https://www.cnpd.pt/>.
12. The personal data collected may be transmitted to administrative entities or judicial authorities, whenever necessary to comply with legal duties of collaboration and reporting.
13. The rules applicable to the conservation of personal data follow the provisions of section XIII of this Policy, unless otherwise provided by law.

VIII. Preliminary Assessment

1. After the reporting of an Irregularity is received, a member of the Audit Committee is appointed to process and handle each report (“**Processor**”), who must, within a maximum of 7 (calendar) days of the date of receipt of the Report, send the Whistleblower an acknowledgement of receipt of the report.
2. The acknowledgment of receipt referred to in paragraph 1 above must contain clear and accessible information on the requirements, competent authorities and the form and admissibility of the external report.
3. Following the Report, all appropriate internal measures are taken to verify the allegations contained therein and, where appropriate, to put an end to the reported Irregularity, including through the opening of an internal investigation or communication to the competent authority for investigation. of the offence, including the institutions, bodies or agencies of the European Union.
4. If the reported Irregularity refers to suspicions of criminal activities, proposed or attempted, underway or executed, the Processor must report these suspicions to the Regulatory Compliance Officer, who, if justified, will immediately report the suspicions or facts to the authorities – together with the Chairman of the Audit Committee of REN - REDES ENERGÉTICAS NACIONAIS, SGPS, S.A., in the cases provided for in Chapter IX (3) below – and/or propose that the Board of Directors or the Executive Committee take provisional, precautionary and preventive measures.
5. If the reported Irregularity could give rise to disciplinary responsibility, the Processor must report it to the Human Resources Department, without prejudice to compliance with the provisions of this Procedure.
6. If the reported Irregularity relates to the violation of the rules contained in the REN Group Code of Conduct, the REN Group Integrity Policy or the Plan for the prevention of risks of corruption and related violations, the Processor must report it to the Regulatory Compliance Officer.
7. If the reported Irregularity relates to the breach of personal data, the Processor shall refer the handling of the matter to the Data Protection Officer, within 48 hours, without prejudice to compliance with the provisions of this Procedure.
8. If the Irregularity has been reported, pursuant to Article VII. to the National Data Protection Commission, the Processor shall make the matter known to the Data Protection Officer within 48 hours, without prejudice to

compliance with the provisions of this Procedure.

9. If the reported Irregularity relates to a situation of harassment at work, the Processor shall refer the matter to the Human Resources Department for handling, without prejudice to compliance with the provisions of this Procedure.
10. The Processor must make a preliminary assessment of the coherence and truthfulness of the report and on the existence of sufficient and reasonable indications to carry out an Investigation Process on the reported Irregularity.
11. Whenever the identity of the Whistleblower is known, he/she may be contacted to clarify any aspects of the report that are considered incomplete, insufficient or ambiguous, and to ascertain, complete or clarify information considered relevant to the preliminary assessment, unless when expressly requested otherwise by the Whistleblower or in cases where there are reasonable grounds to believe that the contact may compromise the protection of the Whistleblower.
12. In any case, the Processor informs the Whistleblower of the measures planned or adopted to follow up on the Report and the respective grounds, within a maximum period of three months from the date of receipt of the Report.
13. The preliminary assessment will be based on the information obtained from the Whistleblower and a report will be prepared on it by the Processor in which the following factors will be weighed (“**Preliminary Report**”):
 - (i) the type of Irregularity;
 - (ii) the plausibility of the content of the report;
 - (iii) the appearance of Irregularity of the situation identified;
 - (iv) the practical feasibility of any Investigation Process, with identification of potential obstacles or relevant conditioning factors;
 - (v) the identification of any persons who may be involved or have knowledge of facts relevant to the assessment of the reported irregularity, with a view to the future conduct of investigation steps.
14. The Preliminary Report should be concluded within 20 (calendar) days of the date of receipt of the report of Irregularity and made immediately available to the remaining members of the Audit Committee.
15. The Audit Committee will analyse and discuss the Preliminary Report, and its supporting documentation, and, with justification, within 10 (calendar) days of the availability of the Preliminary Report, approve:
 - (i) the continuation of internal steps to identify the Irregularity in question (“**Investigation Process**”) and the maximum period to conclude the Investigation Process, which, except in justified cases, may not exceed 30 calendar days from the date of the decision of the Audit Committee instituting it;
 - (ii) the rejection of the report;
 - (iii) if it is not necessary to open an Investigation Process because the Preliminary Report allows the complete and well-founded identification of the Irregularity, a proposal to the Board of Directors or the Executive Committee - depending on the Irregularities confirmed - the approval of corrective

measures to remedy the Irregularity in question (“**Remedy Measures**”) and the maximum period for their implementation.

16. In the cases of sub-paragraphs (ii) and (iii) of the preceding paragraph, the Audit Committee will inform the Whistleblower, in writing, of its decision, within 5 (calendar) days of the date of its approval by the Audit Committee, pursuant to the preceding paragraph, unless the disclosure of such information may conflict with compliance with legal obligations or legitimate orders from the authorities.
17. In the case of subparagraph (i) of paragraph 15 above, at the end of the Investigation Process:
 - (i) the Audit Committee will decide on the rejection of the communication or the adoption of Remedy Measures and the maximum period for their implementation; and
 - (ii) there will be a new communication from the Audit Committee informing the Whistleblower of the Audit Committee's decision referred to in the preceding paragraph, within 5 (calendar) days of its approval, unless the disclosure of such information may conflict with compliance with legal obligations or legitimate orders from the authorities.
18. In any case, the Whistleblower may request, at any time, that the result of the analysis carried out on the Report be communicated within 15 (calendar) days after the respective conclusion.

IX. Investigation Process

1. The Investigation Process is carried out and supervised by the Audit Committee, which can appoint a member responsible for the Investigation Process (“**Process Manager**”) and, taking into account the subject-matter, complexity or seriousness of the Irregularity in question, can hire external auditors or legal consultants, as a structure to support the structure of the Investigation Process.
2. During the Investigation Process, the Audit Committee must comply with, and strive to ensure compliance with the applicable legal and regulatory rules, and with the internal procedures and rules in force at REN or the company of the REN Group in question.
3. The Audit Committee must ensure that the entities which act as an external support to the conduct of the Investigation Processes maintain confidentiality with regard to any facts and information of which they become aware due to, or within the scope, of the Investigation Process, complying with this Procedures.
4. Within the scope of the Investigation Process and the assessment of the Irregularity in question, the Audit Committee or the Process Manager, as applicable, must take into account possible situations of conflict of interests on the part of the Whistleblower or the individuals working on the Investigation Process.
5. For the purposes of the previous paragraph, a situation of a conflict of interest is considered to exist when there is a person whose impartiality in terms of acting, analysing or making decisions is reduced or affected by virtue of (i) the person and/or matter that is the subject of the Investigation Process or (ii) the persons in question, or their spouse, relative or kin, in a direct line or up to the 2nd degree of the collateral line, or any person with whom they live in as an unmarried couple (*união de facto*) and/or with whom they live in the same household (*economia comum*), who are able to obtain any benefit or suffer disadvantages, even if intangible, as a result of the outcome of the Investigation Process.

6. The Investigation Process may include the implementation of the following measures by the Audit Committee or the Process Manager, if the latter is appointed:
 - (i) collection of documents or information;
 - (ii) conducting interviews with individuals considered to be relevant in order to ascertain the facts in question;
 - (iii) conducting internal or external audits;
 - (iv) preparation of a final report with (1) the description of the measures implemented, (2) an overview of the relevant facts and the critical assessment of them, (3) the identification of the applicable legal, accounting or regulatory rules and (4) the conclusions reached (“**Final Report**”);
 - (v) other measures considered suitable and proportional to the seriousness of the Irregularity being assessed.

X. Final Report

1. The Process Manager, if any, is responsible for preparing a proposal for a Final Report and for adopting possible Remedy Measures.
2. The Final Report must be approved by the Audit Committee within 4 months of the discussion of the Preliminary Report.
3. The deadline stipulated in paragraph 2 above can be extended by resolution of the Audit Committee, based on a proposal submitted by the Process Manager, should there be one, whenever the complexity of the case or the duration of measures to be implemented so justify.

XI. Remedy Measures

1. If the conclusions of the Final Report so justify, the Audit Committee must also, taking into account the Irregularities assessed, propose to the Board of Directors or to the Executive Committee the approval of Remedy Measures. If the Executive Committee decides that the Remedy Measures should be carried out, it shall inform the Audit Committee within 15 (calendar) days. The responsibility for applying the Remedy Measures is transferred to the Executive Committee.
2. Remedy Measures may include, in particular:
 - (i) the approval of amendments to procedures, rules or methods concerning risk management, internal control, internal audit or other policies of the Company and/or other companies of the REN Group;
 - (ii) the introduction or disclosure, as applicable, of rectifications or adjustments to documents or information;
 - (iii) communications to the competent administrative entities and/or authorities;
 - (iv) bringing a legal action;

- (v) beginning a disciplinary procedure;
 - (vi) suspending or terminating of contractual relationships;
 - (vii) suspension or removal from duties as a member of a corporate body at the Company or companies of the REN Group.
3. If the Irregularities assessed refer to facts which constitute a public crime (*crime público*), the Chairman of the Audit Committee of REN - REDES ENERGÉTICAS NACIONAIS, SGPS, S.A. and the Regulatory Compliance Officer shall provide the information to the Public Prosecutor's Office (*Ministério Público*).

XII. Notification of the Whistleblower

1. The Audit Committee shall inform in writing the Whistleblower of the measures envisaged or taken to follow up the report and the reasons for them (including, if applicable, conclusion of the Investigation Process and the Remedy Measures adopted as a result thereof) within three months of the date of receipt of the report, or, if this has not been sent to the Whistleblower, three months after the expiry of the term of 7 (calendar) days from the filing of the report, unless the disclosure of such information may conflict with compliance with legal obligations or legitimate orders from the authorities.
2. In the communication provided for in the preceding paragraph, the Audit Committee must take into account any duty of confidentiality that binds the company in question, the legitimate rights and interests of its employees, service providers, members of governing bodies, shareholders and third parties and the interests of REN or of the company belonging to the REN Group.

XIII. Filing of reports

1. Without prejudice to maintaining a factual report on record regarding the situations described in the reports received, which should not contain any details that would enable the identification of either the Whistleblower or the alleged Perpetrator of the Irregularity, the Audit Committee will ensure that necessary measures are implemented concerning the archiving of communications, which must be archived in a confidential environment, subject to restricted access for 5 years from the date of receipt and, regardless of this period, during the term the judicial or administrative proceedings related to the Report is pending.
2. Reports submitted orally, over a telephone line with recording or other recorded voice message system, are registered, with the consent of the Whistleblower, by means of:
 - (i) recording of the report on a durable and retrievable medium; or
 - (ii) complete and accurate transcription of the report.
3. If the verbal reporting channel used does not allow its recording, a reliable report of the communication is recorded.
4. If the Report is presented in a face-to-face meeting, the Audit Committee ensures, after obtaining the Whistleblower's consent, the recording of the meeting by means of:
 - (i) recording of the communication on a durable and retrievable medium; or

- (ii) reliable minutes.
5. In the cases referred to in paragraphs 2 and 4 of this section, the Audit Committee allows the Whistleblower to view, rectify and approve the transcript or minutes of the communication or meeting, by signing it.

XIV. Reports of Irregularities

The conduct of any Whistleblower submitting a report that breaches the principles of truthfulness, integrity and good faith, without serious grounds to believe that the information is, at the time of the reporting or public disclosure, true, will constitute an infringement susceptible of being object of disciplinary sanction appropriate and proportionate to the infraction, without prejudice to the civil and/or criminal liability that may arise for the Whistleblower from the practice of said conduct.

XV. Guarantees

1. While managing and operating the System, the Audit Committee must (i) strive to ensure the confidentiality of the information contained in communications and the anonymity of the Whistleblower and the persons who have worked on the investigation of facts and information and (ii) prevent retaliation against the Whistleblower or any of these persons.
2. The protection granted to the Whistleblower is extendable, *mutatis mutandis*, to:
 - (i) any natural person who assists the Whistleblower in the reporting procedure and whose assistance must be confidential, including union representatives or workers' representatives;
 - (ii) a third party that is linked to the Whistleblower, namely a co-worker or family member, and may be the target of retaliation in a professional context; and
 - (iii) any legal person or similar entity that is owned or controlled by the Whistleblower, for which the Whistleblower works or with which he/she is somehow connected in a professional context.
3. The protection granted is excluded when (i) the Whistleblower has no serious reason to believe that the information is, at the time of the report or public disclosure, true or (ii) gives knowledge of an infringement to the media or the journalist outside the cases provided for in section VII, without prejudice to the applicable rules on journalistic secrecy and protection of sources.
4. Any reporting of Irregularities provided for in this Procedure is treated as confidential.
5. Even in the case of reporting of Irregularities which identify the Whistleblower, this identification is not to be disclosed, except with the Whistleblower's express consent to enable investigation measures to be implemented.
6. REN and other companies of REN Group cannot dismiss, threaten, suspend, intimidate, harass, persecute, withhold or suspend payments of salaries and/or benefits, demote, transfer or in any other way engage in any discriminatory, retaliatory or threatening behaviour concerning (i) a Whistleblower, based, even if not overtly, on a report of Irregularity made in good faith, accurately and in compliance with the terms of this Procedure or (ii) any person providing any information or cooperating within an Investigation Process or

participating in any investigation measures.

7. In addition to the rights set out in paragraph 7 of section VII., the persons concerned by the Irregularity report are ensured a fair and equitable Investigation Processes, with safeguards for their rights of defence, including the right to be heard, and the presumption of innocence. These individuals enjoy the same protection as Whistleblowers with respect to the confidentiality of their identity.

XVI. Report regarding the activity

1. The Audit Committee will include, annually, in its activity report a summary description of the measures implemented under this Procedure and will propose to REN's Board of Directors any amendments it deems necessary to improve and perfect the System.
2. The Audit Committee will inform the Board of Directors and the Regulatory Compliance Officer, if requested by the latter, about the conclusions drawn from the above report.