

REGULATIONS OF THE INTERNAL WHISTLEBLOWING CHANNEL OF JJUAN SAU

PRELIMINARY CONSIDERATIONS

Law 2/2023, of February 20, 2023 on the protection of people who report breaches of the law and on combating corruption, in line with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, seeks to provide adequate protection against the retaliation that may be sustained by individuals reporting any acts or omissions that may constitute breaches of European Union law via the procedures envisaged in same, and also to strengthen a reporting culture, the integrity infrastructures of the organizations and to encourage a reporting culture as a means of preventing and detecting threats to the public interest.

JJUAN SAU, in line with such legislation will set up an internal whistleblowing channel as a direct means to report suspicions of fraud or irregular situations.

Since 2021, JJUAN SAU has formed part of BREMBO SPA, a corporate group which is deeply committed to a corporate culture over which ethical principles and compliance with the law preside. The implementation of a whistleblowing channel within the company is the most effective way of reporting suspicions of fraud or irregular situations.

BREMBO SPA has implemented in its corporate group an internal reporting or whistleblowing system, that can be made extensive to all of the group companies, including JJUAN SAU, in accordance with article 11 of Law 2/2023, of February 20, 2023 on the protection of people who report breaches of the law and on combating corruption.

In accordance with the foregoing, JJUAN SAU, in a meeting held on July 17, 2023, the Board of Directors of the Company authorized the whistleblowing channel provided by BREMBO SpA for its corporate group, through which anyone can report suspicions of fraud and any purported irregularities of which they become aware, which shall be governed by these Regulations. The system implemented respects the anonymity and protection of personal data, protecting the identity of the whistleblowers with the necessary measures to guarantee the anonymity of the whistleblower both during the stage in which the facts reported are processed and also throughout the processing of the procedure.

DEFINITIONS

Retaliation: any acts or omissions, including threats or attempts, that occur in a work-related context, are prompted by internal or external reporting or by public

disclosure, which directly or indirectly cause or may cause unjustified detriment to the reporting person or material and non-pecuniary damages.

Unlawful or irregular conduct: any breach of the law or regulations in force, and of JJUAN SAU's internal regulations.

Disclosure or reported breach: the communication of a breach or irregular or unlawful conduct.

Accused person: the person who is reported by the whistleblower as participating in the irregular or unlawful conduct.

Whistleblower: the person who reports a breach via the means in place for this purpose.

Interested party: the person or organization who may be affected by or consider themselves to be affected by a decision or activity in the processing of the procedure.

ARTICLES

Article 1. Objectives.

The aim of this document is to regulate JJUAN SAU's internal Whistleblowing Channel, establishing the procedure to report any irregular or unlawful event or conduct that has taken place within the organization with a view to protecting the rights and guarantees of all the individuals that participate in the reporting procedure and investigation.

In accordance with article 11 of Law 2/2023, of February 20, 2023, on the protection of people who report breaches of the law and on combating corruption, JJUAN SAU implements the Internal Reporting System or Whistleblowing Channel established by BREMBO S.p.A. for its corporate group.

Article 2. Scope of application.

These Regulations shall be applicable to all the persons comprising the corporate structure of JJUAN SAU who make a disclosure or against whom a disclosure is made due to irregular or unlawful conduct, by means of the Whistleblowing Channel set up for the purpose.

Anyone involved in JJUAN SAU's activities may report breaches or make disclosures, including:

- employees of the company or other companies in the Brembo group;
- self-employed workers, collaborators, and consultants;

- employees or collaborators of providers, contractors or subcontractors;
- customers;
- voluntary staff and interns;
- shareholders and persons with administrative, management, control, supervision or representation functions.

Article 3. Guiding principles of the internal Whistleblowing Channel.

The Whistleblowing Channel of JJUAN SAU shall be governed by the following principles:

1. Good faith: whistleblowers shall act in good faith which means not making false disclosures. Legislation in force establishes that anyone who intentionally makes false or misleading statements or statements in bad faith shall be liable at a civil, criminal or administrative level.
2. Retaliation against the whistleblower is prohibited: JJUAN SAU shall take the necessary measures to prohibit all forms of retaliation, threats of retaliation and attempted retaliation against whistleblowers.
3. Confidentiality: The identity of all the persons affected by the information provided in the Whistleblowing Channel shall be protected and the confidentiality of the data shall be guaranteed. The identity of the whistleblower shall remain confidential during all the stages of the investigation and resolution of the reported breach. It shall not be revealed to third parties nor to the person against whom the disclosure is made. The details of the whistleblowers and the rest of the persons involved may be notified to the competent court bodies, judicial bodies, to the Public Prosecutor's Office and to the State Security Forces for the processing of the court proceedings that may be necessary as a result of the investigations conducted.
4. Presumption of innocence and defense: JJUAN SAU shall at all times guarantee the right of the reported person to defend themselves in the internal process against any accusation made against them.
5. Anonymity: JJUAN SAU shall guarantee that the person making the disclosure may, if they wish, remain anonymous by indicating this when making the initial disclosure.
6. Voluntary nature: this Regulation is based on a voluntary reporting scheme.
7. Independence and autonomy: all persons who may have a direct or indirect interest or involvement in the situation disclosed shall be excluded from the investigation and decision-making process, in order to ensure that all stages of the process are carried out in an independent and impartial manner, ensuring the absence of any actual or potential conflict of interest in the conduct of the proceedings.

Article 4. Disclosure or report of a breach.

1. A disclosure or report of a breach shall be deemed to be disclosing via the Whistleblowing Channel, conduct, acts or omissions related to the Brembo Group's activities in the following areas:

- breaches of specific national or EU regulations that harm the public interest or the integrity of the public authorities or of JJUAN SAU or the Brembo group;
- breaches of the company's Organization and Management Model;
- breaches of other corporate codes of conduct, policies and procedures for which the whistleblowing channel has been set up and which have been implemented at the company, including but not limited to: Code of Ethics, Anti-Corruption Code of Conduct, Anti-Trust Code of Conduct, Privacy Policy, Code of Basic Working Conditions, Non-Discrimination and Diversity Policy, Sustainable Hiring Policy.

2. Reports of breaches or disclosures may be made using any of the means established by BREMBO SpA for its group, via the following methods:

- Legality Whistleblowing web platform;
- Legality Whistleblowing mobile app.

3. The disclosure may be made orally or in writing, anonymously or identifying the whistleblower. The whistleblower may request a meeting with the Manager of the Internal Reporting System directly, by leaving a written or oral message on the platform. The disclosure or breach reported, shall, with the whistleblower's consent, be registered on the platform to ensure adequate management.

4. The disclosure must contain the following information:

- a) a specific and detailed description of the facts and date on which they took place.
- b) the identification of the persons that participated in the facts reported.
- c) the identification of the department or area of the company in which the facts reported took place.
- d) documents or evidence that help to verify the accuracy of the facts reported.

5. Without prejudice to the possibility for interested parties to make disclosures through the internal whistleblowing channel, they may also submit external complaints to the competent authorities through the procedure provided for in Title III of Law 2/2023 of February 20, 2023.

Article 5. Obligations of the whistleblower.

1. The whistleblower must have, at the time he/she makes the disclosure, reasonable grounds to believe that the information is true. Making disclosures that

are generic, in bad faith or an abuse of the law are prohibited.

2. The whistleblower shall describe the facts in detail and shall provide all the documentation and evidence that he/she has available of the facts reported.

Article 6. Protection of the whistleblower.

1. The whistleblower may not suffer retaliation and any acts of retaliation suffered in violation of this prohibition shall be null and void.

The protection provided for above shall also apply to those who facilitate the disclosure, to the whistleblower's co-workers and to the family members of the whistleblower. They shall also apply to legal entities for whom the whistleblower works or with whom they otherwise have an employment relationship or in which the whistleblower has a stake.

2. Disclosures may only be used by those who manage the channel for monitoring purposes, and revealing the whistleblower's identity is expressly prohibited.

The whistleblower's identity and any other information from which that identity can be deduced, directly or indirectly, may not be disclosed, without the express consent of the whistleblower, to persons other than those competent to follow up disclosures.

The identity of the persons involved and of the persons mentioned in the report is also subject to the same protection measures and confidentiality guarantees.

3. The protection envisaged above will only be applied if at the time of the disclosure, the whistleblower had reasonable grounds to believe that the information regarding the reported breaches was true and fell within the scope of the procedure.

Article 7. Rights of the accused person.

1. The accused person has the right to know of the existence of the breach reported and must be informed of it within a maximum term of 7 calendar days from its receipt.

2. The accused person has the right to have it recorded in the case record and record of reported breaches that the disclosure made against them has been, where applicable, closed, both in the event that the reported breach has not taken place, and in the event that the reported facts or conduct are not irregular or unlawful.

3. The accused person and any third party mentioned in the disclosure shall enjoy the protection of his/her data in the processing of their data, based on JJUAN SAU's legitimate interest, as data controller in maintaining a whistleblowing channel with all the necessary guarantees.

Article 8. Identification of the whistleblowing channel.

1. JJUAN SAU's internal whistleblowing channel is set up using the IT tools provided by BREMBO SpA for its corporate group which uses IT methods that include encryption tools to guarantee the confidentiality obligation, and which can be accessed through the web platform or the Legality Whistleblowing mobile app, which can be accessed from the website www.jjuan.es.

2. The tools implemented guarantee that the receipt, through these means, of any communication that may be considered a disclosure, will respect the confidentiality of the data and information received, throughout the assessment process and for the adoption of the appropriate measures.

3. The management, access to the information and maintenance of the Whistleblowing Channel shall be carried out by the GCF (Global Central Function) Internal Audit of BREMBO SpA, as an independent department with personnel specifically trained for the management of the Brembo Group's Whistleblowing Channel, in the person of the Chief Internal Audit Officer, who is appointed to the position of Manager of the Internal Reporting System, in accordance with the provisions of articles 8 and 11.2 of Law 2/2023 of February 20, 2023.

Article 9. Procedure for managing disclosures.

1. The disclosure shall be sent via the means implemented on the platform, for which the user must have registered. The user's data will be separated from the data of the disclosure. The disclosure will be sent via the platform to the users identified as Manager of the System (Internal Audit Director) and to the secretary of the GCF Internal Audit of BREMBO SpA, concealing the whistleblower's identity.

If considered necessary for the purposes of the correct functioning of the system the Manager of the Internal Reporting System may access the whistleblower's data via the platform and in an automated manner.

Within 7 days of receipt of the disclosure by the system, the GCF (Global Central Function) Internal Audit Secretary of BREMBO SpA will send the whistleblower an acknowledgment of receipt of the disclosure.

2. The Manager of the Internal Reporting System shall carry out a preliminary analysis of the information received in the disclosure carrying out the verifications and actions deemed necessary, requesting any additional documentation or information deemed appropriate, both from the whistleblower and from the areas or departments of the company that may have such documentation or information, or which may be affected, for the following purposes:

- to assess whether the information received, falls within the scope of this procedure; in the event the information is found not to be within the scope of the system, a prompt response shall be provided to the person reporting the information and the report shall be closed;

- to assess whether the disclosure falls within the scope of application of the Organization and Management Model implemented by JJUAN SAU, if applicable; in this case, the disclosure will also be notified, via the platform to the Chairman of the Brembo S.p.A. Supervisory Body and/or to the Chairman of the company's Supervisory Body, who may have access to the content of the disclosure, as the entity responsible for managing such disclosures;

- to assess whether there are any reasons that justify further verification: if additional clarification is required, the whistleblower will be contacted for such clarification, including via the platform; if no response is received from the whistleblower, the disclosure will be closed by providing a timely response to the whistleblower.

3. In the event that the preliminary analysis reveals that there are grounds to proceed, an internal verification or investigation shall be conducted.

The internal verification or investigation shall be carried out by qualified personnel of the GCF Internal Audit of BREMBO SpA according to the skills required for the investigation. The participation in the internal investigation of persons outside the GCF Internal Audit of BREMBO SpA, for specific skills or responsibilities in the investigation must be notified to the whistleblower.

The Manager of the Internal Reporting System, in the person of the internal Audit Director of BREMBO SpA, shall assess the data and information provided in the disclosure which shall be shared via the platform with other entities involved and solely for the purposes of a correct internal investigation. The identifying particulars of the whistleblower may only be shared for these purposes with the whistleblower's express authorization.

The internal investigation shall be carried out with the maximum speed, confidentiality and guaranteeing the rights of defense and participation of all persons involved.

For the internal investigation, the Manager of the Internal Reporting System, in the person of the internal Audit Director of BREMBO SpA, may conduct interviews with the whistleblower and request any clarification he considers necessary.

The person or persons involved in the disclosure may make any verbal statements in interviews, or in writing, and provide documents, for the proper verification or investigation of the facts reported in the disclosure.

Should it be necessary to conduct interviews with the affected personnel, witnesses or other personnel of interest, such steps shall be carried out by the Manager of the Internal Reporting System, in the person of the internal Audit Director of BREMBO SpA, with the utmost respect for the rights of each of the parties affected.

4. The processing of the procedure envisaged in these regulations shall run for a maximum period of three months from receipt of the disclosure or reported breach,

except in particularly complex cases needing a longer amount of time, in which case, the time period may be extended for up to a further three months. The whistleblower must be informed of any extension of the ordinary maximum time limit for processing the disclosure or reported breach, stating the reasons for the extension and providing information on the progress of the investigation and the term envisaged for the conclusion of the case.

Article 10. Conclusion of the procedure and decision.

1. Once the initial analysis of the disclosure and any investigation of the disclosure that may be necessary have been carried out, the Manager of the Internal Reporting System will issue the relevant decision, in which a response will be provided to the whistleblower and will be communicated to him/her.

The decision will also be notified to the Chairman of the Brembo S.p.A. Supervisory Body and/or to the Chairman of the company's Supervisory Body, in the event that it refers to facts within the scope of application of the management and organizational model implemented by JJUAN SAU.

2. The decision may find that the disclosure is:

a) justified, if it confirms the existence of irregular or unlawful conduct. In such event, the decision may include recommendations on the adoption of adequate response measures addressed to the managing body of the company.

b) unjustified, if the investigation and steps taken do not reveal the existence of irregular or unlawful conduct, or if there is insufficient evidence to confirm the existence of an infringement.

3. The managing body shall have the authority to adopt the appropriate decisions bearing in mind the situation reported, the decision and the recommendations adopted by the Manager of the Internal Reporting System.

4. If it emerges from the procedure, that the facts reported may constitute a criminal offense, all the information shall be immediately forwarded to the Public Prosecutor's Office. If the facts affect the financial interests of the European Union, the information shall be sent immediately to the European Public Prosecutor's Office.

Article 11. Record of information. Communications.

1. The receipt of disclosures and all the steps taken in the context of the whistleblowing channel implemented by JJUAN SAU, shall be reflected in a record of the information received and internal investigations performed, which shall be kept by the Manager of the Internal Reporting System.

2. The Manager of the Internal Reporting System shall periodically report, via the platform, on his activities in relation to the disclosures and steps taken, to the

governing bodies of the company and to the institutional control bodies of BREMBO SpA.

Article 12. Confidentiality guarantee.

1. All persons who, directly or indirectly, may be involved in the handling of any disclosure, shall keep confidential any information that comes to their knowledge in any way whatsoever.

2. Unless the whistleblower expressly requests otherwise, their identity shall be kept completely confidential and shall not be revealed to any person, except in the cases expressly contemplated in these Regulations. All notifications, actions or requests for documentation that are carried out during the processing of the procedures shall omit the data regarding the whistleblower's identity and any other data through which he/her may be identified.

3. In accordance with article 29 of Law 2/2023, of February 20, 2023, the processing of personal data resulting from the procedures established in these Regulations shall be governed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and by Personal Data Protection Organic Law 3/2018, of December 5, 2018.

In all cases the whistleblower shall be expressly informed that his/her identity will be kept confidential and shall not be disclosed to the persons to whom the reported breaches refer, nor to third parties.

Article 13. Duty to cooperate.

All the bodies comprising the corporate structure of JJUAN SAU, as well as the personnel in its service, have the duty to collaborate with the competent bodies in the investigation of disclosures for the proper investigation of the proceedings and the fulfillment of the functions entrusted to them, within the limits established by the legislation in force.

Article 14. Dissemination.

These Regulations shall be immediately disseminated within the company's internal structure, and the necessary consultation, communication and dissemination activities shall be carried out to ensure that they are easily accessible and understood by all the parties concerned.

Article 15. Secondary provisions.

In all matters not expressly provided for in these Regulations, the provisions of Law 2/2023 of February 20, 2023 shall be applicable.

Article 16. Entry into force.

These Regulations shall enter into force on September 1, 2023.