Whistleblowing Policy

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1. Objective

This Policy for the management of the investigation of reports of breaches and responses to enquiries (hereinafter referred to as the “Policy”) is a tangible way in which Worldreader applies its ethical values, ensures Worldreader Professionals respect ethical norms & standards, Worldreader policies and applicable legislation (“Applicable Standards”), and applies a principle of zero-tolerance of breaches of Applicable Standards.

The purpose of this Policy is to establish the necessary mechanisms to resolve doubts relating to the interpretation of Applicable Standards, and report and promptly manage any behavior which breaches Applicable Standards and may constitute a criminal offence and/or entail criminal liability of Worldreader as a legal entity.

2. Scope

This Policy is binding and of global and direct application to all entities comprising Worldreader, regardless of their geographical location, and binds all Worldreader Professionals, regardless of their position or function.

This Policy covers all enquiries and reports of breaches that may be made by any Worldreader Professional, as well as the management of investigations into reports of breaches.

3. Roles and responsibilities

3.1 Compliance Officer

The Executive Team has designated the Compliance Officer to oversee the corporate compliance program, providing him/her with autonomous powers of initiative and control, as well as of the greatest possible independence to carry out their tasks. The responsibilities of the Compliance Officer in case of receiving a report of a breach or enquiry are as follows:

- Receipt of all enquiries and reports of breaches received through the reporting channels set out in Section 4.1 of this Policy.
- Relaying of any enquiry or report of breach to the Ethics Committee, in order to decide whether the report is admissible or out of scope.
3.2 Ethics Committee

The Ethics Committee is a standing advisory and executive body in respect of corporate compliance-related issues, which is coordinated by the Compliance Officer and consists of the following roles:

- Compliance Officer;
- Director of Human Resources; and
- Impact team Global Leadership Team (GLT) anchor.

The responsibilities of the Ethics Committee in case of receiving a report of a breach are the following:

- After assessing the report of breach received, if appropriate, inform the Executive Team of the suspected breach of the Applicable Standard;
- Ensure that the report of breach received contains all the points detailed in Section 4.3 of this Policy and, if not, request that the person reporting a breach to complete it, if possible;
- Resolve whether or not to investigate the reported breach;
- In performance of the different functions attributed to it, the Ethics Committee may avail itself of specific assistance of Worldreader employees from one or more departments, and/or third parties with specialist expertise in conducting internal investigations, depending on the specific circumstances of the case, when deemed necessary;
- Interview the person who reported the breach as many times as necessary, in order to clarify the facts in as much detail as possible, unless the report of breach is anonymous and the identity of the person making the report unknown;
- Keep records of reports of breaches received for as long as necessary, in accordance with the time period established by law, depending on the facts reported; and
- Issue a case-report or assessment of the report of breach, if required, pursuant to Section 5 of this Policy.

3.3 Executive Team

In the event of an investigation, the Executive Team is ultimately responsible for taking appropriate action, in accordance with Section 5.3 of this Policy.

The Executive Team shall inform the Ethics Committee of the actions agreed, so they are duly recorded and documented. Among other actions, it may order disciplinary measures that are legitimate and proportionate to the facts reported and, in case they affect employees, it will notify the competent
departments to ensure their proper implementation, in accordance with applicable employment legislation.

4. Description of the procedure

4.1 What internal reporting channels exist in Worldreader?

In order to ensure the effective application of this Policy, Worldreader has various internal reporting channels that allow breaches to be reported in writing. Reports of breaches by any Worldreader Professional in matters relating to corporate compliance may be relayed in any of the following ways:

- making a simple report to one’s supervisor. Supervisors should record any report of a breach via the report form via a Google Form;
- Completing a report form directly; or
- Sending an email to the Compliance Officer (compliance@worldreader.org)

In all three cases, the information set out in Annex I should be provided, if available.

The Ethics Committee shall ensure that no retaliatory action is taken against any person reporting a breach or making an enquiry in good faith, in accordance with Sections 4.4 and 4.5 of this Policy, respectively.

4.2 What external reporting channels exist?

Worldreader Professionals are encouraged to report breaches through the internal reporting channels described in Section 4.1 above.

External reporting channels should only be used:

- where the Worldreader Professional or third party has tried using an internal channel and remains dissatisfied with the outcome; or
- has reasonable concerns that the breach will not be addressed effectively internally and/or that the mechanisms in place cannot eliminate the risk of retaliation.

External reporting channels include national law enforcement bodies, regulators and ombudsmans.
4.3 What reports can be made?

Worldreader's internal reporting channels may be used to report a potential breach relating to an Applicable Standard. Concerns reported may relate to past, present or imminent wrongdoing or an attempt to cover up wrongdoing.

Personal grievances (for example bullying harassment and discrimination) are handled by Human Resources Department according to our Anti-harassment Policy (click on relevant country Employment Policy and go to Anti-Harassment Policy section) to access and therefore outside the scope of this Policy.

Personal disputes, mere rumours affecting strictly personal matters relating to Worldreader Professionals and reports made in bad faith will not be investigated as breaches and may have consequences for the person making the enquiry or reporting a breach.

4.4 Enquiries

Enquiries to request clarification or an explanation of the criteria for determining the scope, interpretation or application of an Applicable Standard are distinct from reports of breaches. Worldreader Professionals may resolve doubts or make enquiries by:

- Approaching one’s supervisor; or
- Sending an email to the Compliance Officer (compliance@worldreader.org) including "Enquiry" in the title.

4.5 What information should a report of a breach contain?

Reports of breaches should contain the following:

- The date on which the report was made;
- Details of the person reporting the breach, if the report is not anonymous. In order to facilitate the investigation of the alleged breach, as well as to inform the person reporting the breach of the status of the investigation, Worldreader Professionals are strongly encouraged to identify themselves or at least provide contact details, which will be kept confidential;
- Details of the person allegedly responsible for the breach, as well as of other potential participants and people who might have knowledge of the event in question;
- A clear and detailed account of the facts and of the breach;
• *Proof or supporting evidence*; and
• *Any other information and/or documentation* that the person reporting the breach can provide to help better understand the facts in question.

Details of the above are contained in Annex I.

4.6 Handling of reports

Any report relating to a possible breach will be managed by the Ethics Committee. Upon receipt of the report, the Compliance Officer shall first acknowledge receipt of the report to the person making the report **within seven days of receipt**. The Ethics Committee shall then inform the person reporting the breach **within one month of the date of receipt of the report** of its decision to close the case, request more information or investigate the case:

• If the reported breach is considered irrelevant, inappropriate or out of scope of this Policy, the person reporting the breach will be notified of the closing of the case;
• Where the report is considered relevant, but the information provided is insufficient, incomplete, or does not provide the necessary detail to initiate an investigation, the person reporting the breach will be notified that the report has been registered and they will be asked to provide the necessary additional information; and
• Where the report is considered relevant, and the information provided is sufficient for the start of an investigation, the person reporting the breach will be notified that the report has been registered and the initiation of the investigation, in accordance with Section 5 of this Policy.

In the event of the initiation of an investigation, the Ethics Committee shall, **no later than three months of receipt of the report**, inform the person reporting the breach of the outcome of the investigation.

Information on the person responsible for the breach must be kept only for the time necessary to decide on the appropriateness of initiating an investigation, based on an analysis of the reported facts. In any event, this information must be deleted within three months of the report of breach, except to the extent necessary to evidence the effectiveness of Worldreader’s corporate compliance program.

The Ethics Committee shall ensure that the rights of all those involved in the report are respected.
In the event that the report relates to or implicates a member of the Ethics Committee, he or she shall refrain from participating in the investigation.

4.7 Safeguards in the management of investigations

Worldreader encourages openness and supports any individual who raises genuine concerns, in good faith, under this Policy, even if the investigation finds that they were mistaken. Worldreader will ensure Worldreader Professionals and other third parties can raise their concerns swiftly and confidentially.

Worldreader will ensure that any employee who raises genuine concerns, in good faith, will not suffer any detrimental treatment as a result of raising a concern relating to potential acts of bribery or corruption. Detrimental treatment includes dismissal, disciplinary action, or unfavorable treatment as a result of the concern the individual has raised.

The person reporting a breach is also guaranteed complete confidentiality. The Ethics Committee shall in no case disclose the identity of the person reporting a breach in good faith, unless (i) it considers disclosure appropriate after analyzing the report of the breach and it has obtained the express and prior written consent of the person reporting the breach and/or (ii) it receives a court order obliging disclosure.

For this reason, any information which identifies or could make the person reporting a breach identifiable will be excluded from the information made available to the person alleged to be responsible for the breach.

The Compliance Officer shall maintain a record (controlled by Worldreader) of all the information received, as well as all the actions taken following receipt of a report. In accordance with the provisions of Art. 24.2 of the Spanish Law on Protection of Personal Data and Guarantee of Rights Digital, access to the data contained in that register shall be limited exclusively to those who perform the functions of internal control and compliance and the data processors they designate. Other persons may have access to this information or be sent information, where necessary for the adoption of disciplinary measures or for the conduct of judicial proceedings.

Any individual who has reason to believe that they are being subject to unjust treatment in retaliation for the concern he or she has raised should immediately inform his or her supervisor or the Compliance Officer.
5. Procedure for managing investigations

5.1 Investigation of the report

Once the decision is taken to investigate the report, the person alleged to be responsible for the breach and, where appropriate, third parties involved is/are informed of this fact and an investigation file is opened. The investigation will be led by the Ethics Committee.

The purpose of the investigation is to obtain sufficient evidence to reach a determination and prepare the corresponding report and conclusions.

The investigation may be internal, external or mixed, ensuring in all cases the independence and confidentiality of the investigation, both in substance and form.

Details of the person reporting the breach and other employees and third parties must be kept only for the time necessary for the investigation of the events reported.

All efforts should be taken to process the personal data of the person alleged to be responsible for the breach or third parties named in the report or involved in the investigation, within the maximum period of three months established by data protection legislation.

If there is a significant risk that limiting the investigation to three months would jeopardize the effective investigation of the facts reported or the collection and analysis of the necessary evidence, the investigator shall justify such risk in writing and request a time extension to the Ethics Committee, which must approve or deny the request. If approved, the justification must be recorded in order to provide it to the person alleged to be responsible for the breach upon request.

The information to be provided to the person alleged to be responsible for the breach should include at least the following:

- Identity and contact details of the person responsible for the investigation;
- Rights of access, rectification, erasure, opposition, limitation and portability, as well as their right to lodge a complaint to a supervisory authority;
- The source or sources of the data;
- The category of data;
- The breach which they are alleged to be responsible for; and
• Employees and third parties who may have access to the information during the investigation.

Worldreader must at all times guarantee the confidentiality of the identity of the person reporting the breach and the absence of reprisals in the event of reports made in good faith. For this reason, the identity of the person reporting the breach or information which could make him or her identifiable will be excluded from any information provided to the person alleged to be responsible for the breach in the exercise of a subject access request.

The investigation of the complaint shall be initiated by the investigator designated by the Ethics Committee. The investigator will be responsible for verifying the veracity and accuracy of the facts and information contained in the complaint, and in particular of the reported conduct, in order to verify the existence of a breach of Applicable Standards. For this purpose, he/she shall have the power to conduct interviews with the complainant, the respondent and those third parties involved in the events contained in the complaint.

Of all instructional sessions and interviews conducted during the course of the investigation, the investigator shall draw up a report at the end of each meeting.

5.2 Issuance of case-report on the reported breach

Once the investigation of the case has been completed, the investigator shall draw up a case-report containing the results of his or her investigation and conclusions, addressed to the Ethics Committee, for its members to comment on and make any observations they consider relevant and ratify its content. The case-report and conclusions shall contain at least the following:

• Facts contained in the report of alleged breach;
• Actions taken during the investigation of the case, as well as any relevant documentation analyzed and which may constitute evidence in support of the conclusions; and
• Conclusions reached as to the existence or not of a breach.

Once received from the investigator, the Ethics Committee will ratify its content with whatever amendments it considers appropriate, and shall include proposed actions, addressed to the Executive Team, including appropriate disciplinary actions for any breach, in accordance with local employment legislation.
5.3 Resolution of the case

The Executive Team of Worldreader will be responsible for taking decisions in respect of the case, upon receipt of the Investigation case-report and conclusions adopted by the Ethics Committee. The Executive Team will inform the Ethics Committee of the actions agreed, so that they are duly documented and recorded. It shall, amongst other things, order such disciplinary measures as are lawful and proportionate to the reported facts and, if they affect employees, will inform the departments responsible for implementing them in line with labor regulations (Department of Human Resources and other departments that should implement the measures).

Documentary evidence of the report shall be recorded and the case file blocked to avoid subsequent processing. However, if, as a result of investigations, it emerges that the person reporting the breach acted solely with the intention of prejudicing the person he or she reported or a third party for personal reasons, the Ethics Committee shall assess whether the action of the person reporting the breach constitutes a violation of any of the rights of the person reported and whether disciplinary and/or corrective action should be taken.

6. Declaration of compliance

Since compliance with ethical norms and standards commits the entire company and constitutes a strategic objective for it, it is expected that all members of staff know and respect the contents of this Policy and report potential breaches of Applicable Standards of which they become aware. Likewise, Worldreader expects third parties with which Worldreader enters into a professional relationship, to act in accordance with this Policy. Worldreader will react immediately in the face of potential breaches of the provisions of this Policy, within the limits of applicable legislation.

7. Responsible Department

The Compliance & Legal Department is responsible for maintaining this Policy and resolving any doubts regarding its interpretation. Any questions or concerns that arise as to this Procedure should be directed to Worldreader’s Compliance Officer: compliance@worldreader.org.