



## INTERNAL INFORMATION SYSTEM POLICY

**NAUTA CAPITAL VC PARTNERS SGEIC S.A. and NAUTA CAPITAL UK LIMITED** (together, **NAUTA**) have an **Whistleblowing System**, designed and implemented in accordance with the requirements of current legislation for the adequate protection of people who report regulatory and anti-corruption infractions.

The Internal Information System is enabled to communicate, **in a secure manner**, possible risks or breaches of the applicable legislation and external or internal regulations in any territory in which **NAUTA** carries out its activity or of the internal regulations in force at **NAUTA**.

**NAUTA** is committed to **protecting the people who make these communications** by ensuring, at all times, a **diligent processing** of communications and respect for the following **guarantees**:

- **Confidentiality** of all the people involved in a communication, as well as of all the actions that take place in its processing.
- Possibility of communicating **anonymously**.
- **No retaliation** against persons who communicate in good faith.
- Processing of **personal data** in accordance with current **regulations**.
- **Right to the presumption of innocence** and defence of the **person affected by the communication**.

NAUTA's **Internal Information System**, accessible at [www.nautacapital.com](http://www.nautacapital.com) is composed of the following **elements**:

- **Whistleblowing Channel Policy**
- **Whistleblowing Channel Management Procedure**: which regulates, in detail, the operation of the System.
- **Whistleblowing Channel Manager**
- **Internal channel** as the preferred way to carry out communications
- Access to the **External Channel** managed by the Independent Authority

Failure to comply with any internal rule is a punishable offence. Therefore, failure to comply with policies or procedures implemented in relation to the Internal Information System may result in reasonable and proportionate disciplinary action.