COMPLAINTS RECEPTION PROTOCOL OF VENG S.A.

Approved by the Board of Directors at its Meeting No. 192 on 10/06/2023

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1. Application

This Protocol refers to the enforcement of VENG S.A. Code of Ethics and Conduct.
Its regulations apply to all individuals working at or for the company, regardless of their contractual relationship, the Board of Directors, contractors, subcontractors, suppliers, and other business partners.
Any person who interacts with VENG S.A., whether an employee, supplier, customer or any interested or affected citizen, will be authorized to report any deviation from the established guidelines in the Code of Ethics and Conduct or any violation to the ethical standards ruling the company, regardless of the other actions or complaints that legal regulations may establish.
The right to report circumstances contravening ethical principles will be included as a permanent clause in every Terms of Reference and Specific Conditions developed by the company for goods and services acquisition.

2. How to file complaints

2.1 Complaints may be filed:

a) By e-mail to: lineaetica@veng.com.ar
b) Personally, in verbal or written form, to the following authorities and/or areas:
   - President of VENG S.A.
   - Unit of Internal Audit.
c) Anonymously to the following link:

https://forms.office.com/r/8uM1PPemq7

2.2 Intervention of the Ethics Committee

The Ethics Committee will be informed of all complaints filed through the various channels outlined in this protocol. For that purpose, the Board of Directors President and the Unit of Internal Audit will forward all complaint reports received via any of the

complaint channels by e-mail. The Ethics Committee will then proceed according to the courses of action outlined in point 8.

2.3 Issues to take into account when filing a complaint:

- The complaint may be anonymous or not (it will be accepted as long as the elements attached or included in the presentation allow to presume the authenticity or seriousness of the stated facts, as well as to investigate it), either with reserved or identified identity.
- The description of the facts must be clear, well-founded and pertain to employees and those who provide professional services or are suppliers or contractors of the company.
- If possible, the date and location of the irregularity should be provided.
- Notify third parties external to the organization (contractors, suppliers, employees from other companies, public authorities, etc.) who may be involved in the incident.
- No one is required to disclose the complainant's information or sign the denounce if submitted in writing.

3. Content

The complaint must contain a detailed account of the facts or omissions which are considered to be violations of the Code of Ethics and Conduct. Any anonymous complaint that appears, at first glance, to be reckless, unsubstantiated or aimed at objectives contrary to the ethical spirit that the Code of Ethics and Conduct seeks to respect, will be rejected.
If the case of nominative complaints, the Ethics Committee may request the complainant to provide further details or additional clarifications, under penalty of filing the proceeding.

4. Scope

This Protocol adheres to the provisions contained in the before mentioned Code of Ethics and Conduct. Any irregularity surpassing its provisions should be addressed according to its nature. When the matter entails an irregularity that is subject to investigation as a criminal complaint, the ethical issue will be subsumed within the main investigation.

5. Protection to the complainant

VENG S.A. considers it essential that interested parties feel secure at the moment of reporting any action they believe violates the Code of Ethics and Conduct.
All contacts and investigations will be managed with the utmost confidentiality and in accordance with the applicable laws and regulations.
The complainant has the highest assurance from VENG S.A. that his/her presentation will not result undermining his/her rights as worker, without prejudice to the right of anyone

affected by a reckless or unfounded complaint to counterreport (against the complainant). Retaliation against any internal or external complainant is strictly prohibited.

6. Record of complaints

The Ethics Committee will keep a physical record of complaints in which received complaints and basic details for proper identification will be recorded. Every new complaint will be written in the record with a consecutive number based on the date of reception. The register will include: case number, case name, date of application, description, reported party, complainant (whether anonymous, identified or with reserved identity) and complainant status (internal or external).

7. Courses of action

7.1 The internal filing of the complaint will proceed in any of the following situations:
-The reported facts are deemed implausible.
-They are not considered violations of the Code of Ethics and Conduct.
-It is impossible or impractical to prove them.
-When the facts are already under the analysis of a regulatory or judicial authority for legal treatment.

The file may be reopened if there appear new elements of analysis. Information of filed cases will be kept confidential for statistical and consulting purposes.

7.2 When the complaint involves crimes within the jurisdiction of the Anticorruption Office, pursuant to Decree 102/99, the proceedings will be reported to said organization.

7.3 When from the content of the denounce/complaint, a disciplinary offence and/or crime could be confirmed, the Ethics Committee -subject to its jurisdiction- will give notice to the Legal Counselling Department in order to decide about the course of action to be taken. In cases involving clearly identified employees, and once all available evidence has been collected, the individuals involved will be summoned. In the exercise of their right to defense, they will be given the opportunity to present their statements. Following this, the Human Resources Management will intervene, recommending appropriate disciplinary measures based on the circumstances of the case. If it is deemed necessary to file a criminal denounce, the relevant procedures shall be followed, and the ethical issue will be filed, subsumed within the main investigation.

7.4 When, based on the content of the denounce/complaint or investigations conducted, the commission of acts or omissions that should be brought to the attention of entities other than VENG S.A., has been initially proved, the proceedings

will be notified and/or forwarded to such entities, as it corresponds. A written record will be duly made in the case file and in the Ethics Committee's archives.

8. Reports. Information Requests.

The Ethics Committee will submit reports to the Audit Committee semi-annually or whenever requested by the latter, regarding complaints or relevant developments in the subject matter.

All departments of VENG S.A. are obligated to respond to requests and information inquiries issued by the Ethics Committee within their respective areas of competence."