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### 1. OBJECT

This procedure regulates the management of the Internal Information System and the Complaints Channel.

### 2. SCOPE

All staff

### 3. DEFINITIONS

### 4. DESCRIPTION OF THE PROCEDURE

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## 1. INTRODUCTION

The purpose of this procedure is to regulate the management of the Internal Reporting System and the Whistleblower Channel, enabled to prevent, detect and manage possible breaches of regulations, criminal offences or conduct contrary to the values of the Vincci Hoteles Code of Ethics, as established in Spanish Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, and its counterpart in Portugal, which transposes European Union (EU) Directive 2019/1937 of the European Parliament and of the Council on the protection of persons who report Union law and the rights of the whistleblower.

The Whistleblowing Channel is integrated within the framework of the Criminal Compliance Programme implemented at Vincci Hoteles in accordance with Organic Law 5/2010 of 22 June amending the Criminal Code, which establishes that the legal person is criminally liable for the crimes expressly contemplated in the Law, and in accordance with Organic Law 1/2015 of 30 March, according to which it is compulsory to have an organisational and management model that includes surveillance and control measures suitable for preventing crimes or reducing the risk of their commission.

## 2. COMPETENT BODY

Vincci Hoteles has designated the following bodies as those involved in the management of the internal information system and the complaints channel:

1. Responsible for the internal information system and the complaints channel.
2. Criminal Compliance Committee.
3. External manager of the complaints channel.

The functions of each of these bodies are specified throughout this Standard.

## 3. COMMUNICATION CHANNELS

The communication channels set up by Vincci Hoteles for the reception and management of communications are as follows:



Web form, which allows you to submit communications, even anonymously, which can be accessed through the official Vincci Hotels website, <https://www.vinccihoteles.com/landing-pro/canal-denuncias/>, by clicking on the link to the AUREN FARO tool:

<https://faro.auren.es/FormularioPublico/LadingPage?Token=14ddb429-fd50-40fd-94b9-22dab6f08cdc&Token=14ddb429-fd50-40fd-94b9-22dab6f08cdc>.

Employee portal communication: <https://portalempleado.vinccihoteles.com/solicitudes>



Email to Ms. Estrella Marugán, Chair of the Criminal Compliance Committee at [ccp@vinccihoteles.com](mailto:ccp@vinccihoteles.com)



Postal mail addressed to the Vincci Hoteles Criminal Compliance Committee, Calle Anabel Segura 11, Edificio C, Bajo, Centro de Negocios ALBATROS, Arroyo de la Vega, 28108 Alcobendas, Madrid.



Telephone +34 914 902 650



In person at the Vincci Head Office located at Calle Anabel Segura 11, Edificio C, Bajo, Centro de Negocios ALBATROS, Arroyo de la Vega, 28108 Alcobendas, Madrid.

#### **4. SCOPE OF THE CHANNEL AND TARGET AUDIENCE**

Within the internal Vincci Hoteles Information System, the Whistleblower Channel has become the main channel through which actions or omissions that could constitute criminal or administrative offences or infringements of Vincci Hoteles' internal regulations

can be reported, as it incorporates mechanisms that guarantee the confidentiality of all information and offers a secure communication space for maintaining contact with the compliance bodies of Vincci Hoteles, allowing interaction between the latter and the informants anonymously, without suffering reprisals of any kind.

This whistle-blowing channel is open to all those informants who form part of Vincci Hoteles or who interact with or may be affected by the activity of Vincci Hoteles: employees, self-employed workers, shareholders, managers, clients, suppliers, advisors, subcontractors, competitors, among others.

The Vincci Hoteles Complaints Channel will be shared by the following companies:

- VINCCI HOTELES, S.A.
- NEXOTEL ADEJEJE, S.A.
- LUSOVINCCI UNIPESOAL, LDA.
- HOTEL ZENTRO COSO, S.L.
- GOLF VALDECAÑAS, S.L.
- GEHOSAL LA SALLE, S.L.

Through this channel it will be possible to process:

- Communications relating to acts or omissions that may constitute a serious or very serious criminal offence.
- Actions contrary to the Vincci Hoteles Code of Ethics and other approved internal regulations.
- Civil, commercial, administrative or tax offences.
- Complaints related to occupational risk prevention and health and safety at work.
- Conduct contrary to competition law and the free market.
- Corruption and bribery.
- Situations of harassment, violence or discrimination.
- Infringements against the environment.
- Protection of privacy and personal data.
- Other similar issues.

In the event that the complaints are submitted by e-mail, postal address, telephone or personal interview, the System Manager will register them in the information register of the complaints channel of the AUREN FARO tool.

Other aspects of a labour nature or related to the services provided by the company will be managed through other corporate information channels, depending on the matter in question. This is due to the existence of other more appropriate channels for such communications, and therefore, once they have been analysed, they will be referred to the personnel responsible for their management, notifying the informant of the process to be followed or the interlocutor to be contacted.

## 5. OPERATION OF THE COMPLAINTS CHANNEL

### 5.1. REQUIREMENTS FOR COMMUNICATIONS-COMPLAINTS

The communications to be processed through this channel in accordance with the detailed scope in the previous point must contain, as a minimum, the following information:

- Identification of the communicating person and contact details (except in

anonymous communications).

- Type of communication.

- Clear description of the offence, irregularity or reason for the report, detailing the time of occurrence of the facts, the circumstances and the company in the chain and, where appropriate, the hotel concerned.

- Identification of the person responsible for the irregularity or infringement, if known.

- Providing any available documents or evidence about the situation being reported, or objective indications to enable the personnel assigned to the investigation to obtain evidence of the reported facts or behaviour.

Communications or complaints will not be processed if it is impossible to verify the veracity of the communication received.

## **5.2. OBLIGATIONS OF REPORTERS**

Good faith and diligence: the whistleblower should ensure that the internal communication is made in good faith, i.e. that he/she believes it to be substantially true; it is not unfounded or makes false accusations, lacks motivation or seeks revenge and/or personal gain.

Communications based on opinions which are not accompanied by sufficient substantiation, evidence or which are notoriously false will not be admitted if the facts reported do not constitute an infringement or if the communication has been made in bad faith.

Duty of confidentiality: the informant or informant shall under no circumstances communicate either the content of the internal communication or the identity of the persons affected by the same to third parties or other organisational units of Vincci Hoteles other than the System Managers or the Persons Responsible for the Internal Communication System and personnel assigned to the same.

Contravening and breaching this confidentiality obligation may lead to a variety of measures, including disciplinary measures, depending on the sanctioning regime; contractual measures, especially if the whistleblower is or belongs to a supplier; and even legal action.

## **5.3. RIGHTS AND GUARANTEES OF THE PERSONS COVERED BY THE COMMUNICATION**

As indicated in article 39 of Law 2/2023, during the processing of the case file, the persons affected by the communication shall have the right to the presumption of innocence, the right to defence and the right of access to the case file under the terms regulated in the said law, as well as the same protection established for informants, preserving their identity and guaranteeing the confidentiality of the facts and data of the procedure.

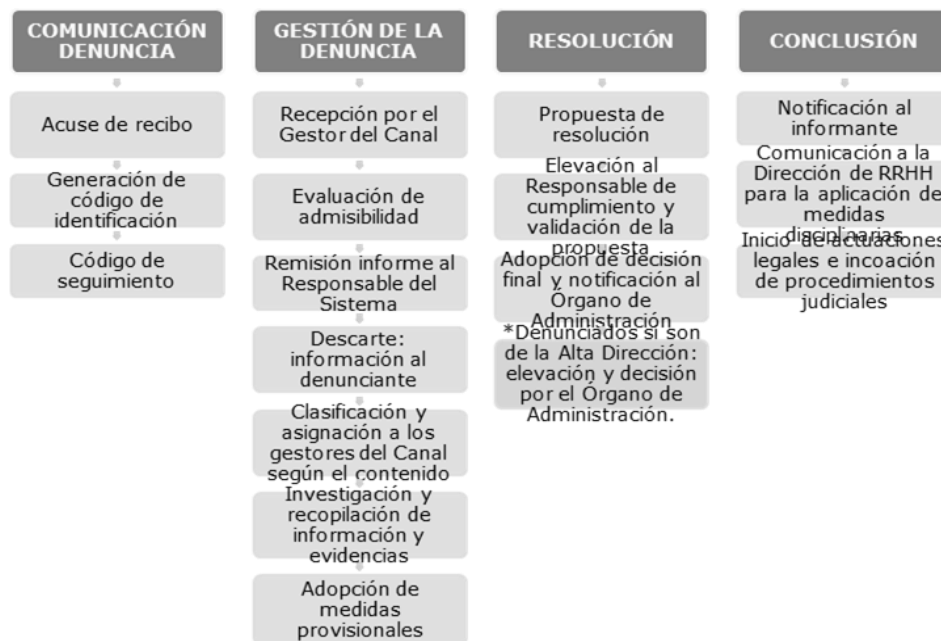
## **5.4. DEADLINES FOR REPLYING TO COMMUNICATIONS**

Internal communications received shall be acknowledged within a maximum of seven days.

The resolution and conclusion of the investigation procedure and its notification to the reporter shall be made within three months of receipt of the communication or complaint.

This maximum period may be extended for a further three months if there are particularly complex reasons for investigating and resolving the irregularities and infringements reported. To this end, the informant shall be notified of the extension with a statement reasoned, seven days before the expiry of the initial period.

## 5.5. SCHEMATIC DIAGRAM OF SYSTEM OPERATION



Important: In accordance with the provisions of article 9 of Law 2/2023, when the facts could be indicative of a crime, HOTELS VINCCI will immediately forward the information to the Public Prosecutor's Office. In the event that the facts affect the financial interests of the European Union, it will be forwarded to the European Public Prosecutor's Office.

## 6. EXTERNAL COMPLAINTS CHANNEL MANAGER

Vincci Hoteles has the collaboration of an external company (Auren Consultores SP SLP) in charge of managing the Complaints Channel. This company (hereinafter, AUREN) is also the one that has designed and provided the computer tool (Auren Faro Sistema de Denuncias) to the Company.

In this regard, AUREN has staff specialised in this area and dedicated to providing the initial reception and management service for the communications that were transferred through the Whistleblowing Channel.

### 6.1. FUNCTIONS

AUREN's work is limited to the initial phases of any process, not entering into the investigation phases, although it may collaborate in ensuring that the documentation and evidence is duly reflected. Accordingly, the functions of AUREN, as External Manager of the Whistleblowing Channel, are:

- Receipt of the communication and sending acknowledgement of receipt to the reporter.
  - Initial screening of submissions and feasibility study
  - Preparation of a feasibility report and transfer to the System Manager.
  - Request, where appropriate, to the reporter for preliminary clarifications.
  - Update the status of the file as appropriate (archive, continuation, investigation...).
- Collaboration for the due collection on the Channel's platform of possible evidence that may be generated.
- Notifying informants of the admission or inadmissibility and archiving of complaints in a

reasoned manner.

## **7. INTERNAL REPORTING SYSTEM AND COMPLAINTS CHANNEL MANAGER**

The System Manager, once the feasibility study and preliminary management by AUREN have been carried out, will be responsible for the management and processing of communications.

In accordance with the provisions of article 8 of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, it must be an executive of Vincci Hoteles and its designation is the responsibility of the Administrative Body, with the Criminal Compliance Committee being informed of the decision.

The System Manager shall perform his/her duties independently and autonomously with respect to the Administrative Body without receiving instructions or being subject to directives from this or other bodies or Members of Vincci Hoteles for their performance. The Management Body of Vincci Hoteles shall ensure that the means and material resources necessary for the effective performance of its functions are placed at the disposal of the System Manager. Likewise, it shall notify the Independent Authority for the Protection of the Informant of the designation of the Persons Responsible for the System. The System Manager may rely on the Vincci Hoteles Criminal Compliance Committee to manage the internal Information System and, in particular, may delegate to its members the management of internal channels and/or information management procedures in order to ensure that the internal channels are managed efficiently, independently and free of any conflict of interest.

Those responsible for the different internal channels must inform the Head of the Internal Information System of any communication received through these channels as soon as possible, with a twofold objective:

- Keeping a record book of the information received and the internal investigations to which they give rise.
- Ensuring by the Head of the Internal Information System that the safeguards set out in the regulations regarding whistleblower protection and the proposed precautionary measures have been complied with.

This obligation falls on the following managers of the other internal channels:

Director of Human Resources, regarding the Vincci Hoteles harassment protocol: labour, sexual and gender-based.

Likewise, the Head of the Internal Information System, for the management of the Whistleblowing Channel, has the collaboration, as Internal Whistleblowing Channel Managers, of:

- Members of the Criminal Compliance Committee

### **7.1. FUNCTIONS**

The System Manager:

It shall carry out the preliminary study and decide on the admissibility of the complaints. If they are admitted, based on their nature and content, it will proceed to open the file and will carry out the investigation itself and, if necessary, with the support of a team of Complaints Managers. In addition, for the better and efficient conduct of the investigation, may request the allocation of additional resources to the Compliance Committee, on a case-by-case basis and as appropriate depending on the complaint. The functions of the System Manager are:



- I. Notifying complainants of the admission or inadmissibility and archiving of complaints in a reasoned manner.
  - II. To be responsible for, coordinate and follow up investigations to their conclusion.
  - III. Request the Compliance Committee to adopt any provisional measures that may be considered necessary for the proper conduct of the investigation. This request must be justified and the aforementioned body shall decide within 5 days of the request whether or not to apply them, documenting the decision and notifying the corresponding Directorate of their application.
  - IV. Issue the resolution proposal report and forward it to the Compliance Committee or the Administrative Body, as appropriate.
  - V. To report the outcome of the conclusions agreed by said body and the final decision to the Board of Directors, if applicable, as well as to transmit instructions to the corresponding departments of the Company for the application and execution of the disciplinary measures that may arise.
    - The Compliance Committee shall be responsible for approving the adoption of the measures agreed on a general basis, and shall notify the Management Body.
    - In the event that such measures affect managerial or first level staff, the Governing Body shall be responsible for taking the final decision and approving the corresponding measures.
  - VI. Notify complainants of the status and outcome of the proceedings, as well as of final decisions.
  - VII. Prepare and report to the Compliance Committee relevant and aggregated information on the operation and activity of the Whistle-blowing Channel, with details of the complaints and communications received, their type, processing and status for the preparation of the corresponding regulatory compliance reports.
- The System Manager shall be responsible for the fulfilment of his or her obligations with regard to the performance of his or her functions, especially in his or her duty to supervise compliance with the guarantees of respect for the rights and duties of whistleblowers and those affected by the complaints, as well as the proper functioning of the investigation process.

## 7.2 RESEARCH OFFICERS

### 7.2.1 DESIGNATION

They shall be designated by the System Officer, with the approval of the Compliance Committee, and shall be based on the following criteria:

- ☐ Skills and competence: technical knowledge of the subject matter of the communication.
- ☐ Neutrality and absence of conflicts of interest: it will be assigned to someone who has no responsibilities, synergies, relationships or functions in the area or with the manager or employee to whom the complaint refers.
- ☐ Adequacy in the assignment of investigations: who may be best suited to investigate, depending on the content of the complaint and the resources that are likely to be needed for the investigation.
- ☐ Availability: depending on their material and organisational availability, as well as taking into account the calendar of holidays and leave.

### 7.2.2 LIABILITY AND OBLIGATIONS

Those responsible for the investigation should ensure that internal communications, the information they contain and the investigation is carried out in a diligent, objective and rigorous manner:



- I. Gather and analyse the information received carefully, assessing the information available and gathering any other information necessary to conduct a thorough investigation.
- II. Protect the confidentiality of the investigation and the privacy of informants and those involved in the processing of information by following the rules and measures established for this purpose.
- III. Assess and determine the seriousness of the complaints, their magnitude and impact on Vincci Hoteles.
- IV. keep the System Manager informed of the results of the investigation.
- V. Collaborate with the System Manager in proposing possible measures to be adopted to remedy the irregularity or non-compliance.
- VI. Assist the System Manager in the preparation of the report to be submitted to the Compliance Officer and/or Management Body.

Managers are responsible for their actions, as well as any act of action or omission that may compromise the investigative work, compliance with the aforementioned obligations and the rights and interests of whistleblowers, as well as the right to information and defence of those affected by internal communications. Any breach of these terms may lead to disciplinary consequences and liability in accordance with the law and internal regulations. In the event that the managers consider that there are sufficient causes that may compromise the investigation work, the fulfilment of the aforementioned obligations and the rights and interests of the informants or in the event that they do not comply, initially or unexpectedly, with the requirements to carry out said work, they shall immediately request to be removed from the investigation, being protected against reprisals to the same extent as the informants. The System Manager will designate an ideal replacement for the person(s) responsible for the investigation to continue with the corresponding investigation.

## **8. FALSE OR UNSUBSTANTIATED ALLEGATIONS**

Vincci Hoteles, aware of its commitment to compliance with current legislation, will invest the necessary personal and financial resources to implement and maintain the effectiveness of the Complaints Channel, undertaking to investigate any internal communication received.

Likewise, it will consider any false or malicious accusation made in a deliberate manner as a very serious offence, which may be sanctioned in accordance with the provisions of the Internal Code of Conduct, by application of labour and/or criminal law.

It should be emphasised, firstly, that we could be dealing with a crime of false accusation or denunciation (art.456), or a crime of slander (art.205) contemplated in the Penal Code.

Indeed, the Penal Code, in Article 456.1, concerning the crime of false accusation or denunciation, establishes that the person who, with knowledge of its falsehood or reckless disregard for the truth, accuses another person of facts which, if true, would constitute a criminal offence, if this accusation is made before a judicial or administrative official who has the duty to proceed with its investigation, shall be punished with a prison sentence of six months to two years and a fine of twelve to twenty-four months, if a serious offence is charged; a fine of twelve to twenty-four months, if a less serious offence is charged; and a fine of three to six months, if a misdemeanour is charged.

On the other hand, the crime of slander contemplated in art. 205 of the Penal Code establishes that "slander is the imputation of a crime made with knowledge of its falsity or reckless disregard for the truth" and can be punished with a prison sentence of six months to two years or a fine of twelve to 24 months, if it is spread with publicity and, in other cases, with a fine of six to 12 months.

Secondly, with regard to labour regulations, Article 58 of the Workers' Statute establishes that "workers may be sanctioned by the management of companies for labour breaches, in accordance with the graduation of offences and sanctions established in the legal provisions or in the applicable collective bargaining agreement.

In this respect, the VI Labour Agreement for the Hotel and Catering Sector -ALEH VI- (Resolution of 20 January 2023, of the Directorate General for Labour) shall apply.

## **9. CONFLICT OF INTEREST**

In those cases in which the Reporting Person detects a possible conflict of interest with the System Manager or with the Internal Channel Manager who is going to receive and/or investigate the communication, or in which the Internal Channel Manager identifies the existence of a possible conflict of interest in the reception phase, the communications will be managed by the alternative manager designated by Vincci Hoteles, or if possible, it will be managed directly by the Internal Information System Manager, when the latter or the Administrative body so considers.

This shall entail the removal of the person in whom the potential conflict of interest arises from the processing of the file originating from the communication, at the stage of the file in which he/she is involved.

In the case of communications relating to workplace, sexual or gender-based harassment, the conflict of interest shall be managed in accordance with the provisions of the Protocol for the prevention of workplace, sexual or gender-based harassment or, failing this, in accordance with the provisions of the first paragraph of this number.

Potential conflicts of interest may concern

- (a) Any Channel Manager set out in this Procedure;
- (b) Criminal Compliance Officer
- (c) Any member of the decision-making bodies.

When the result of the corresponding file determines that the action or omission reported by the reporting person has actually taken place and is attributed to the person in which the conflict of interest arose, he/she shall be subject to the same consequences as the rest of the personnel of the Entity.

In the event of a possible conflict of interest, the Head of the Information System or his or her substitute shall ensure that this conflict of interest is managed, limiting access to the Channel tool, if necessary.

## **10. PROTECTION OF WHISTLEBLOWERS**

The System Administrator shall ensure that no retaliation of any kind is taken against any person or persons who have made a report and/or complaint in good faith, or who have participated in the investigation process, regardless of the outcome.

Persons who report or disclose violations shall be entitled (Art. 35) to the measures of prohibition of retaliation and support provided for in Articles 36 to 38 of the Act. However, persons who report or disclose shall be expressly excluded from protection:

- a. Information contained in communications that have been inadmissible by any internal Communication System or for any of the reasons provided for in article 18.2.a) of the Law.
- b. Information relating to claims concerning interpersonal conflicts or involving only the reporter and the persons to whom the communication or disclosure relates.
- c. Information which is already fully available to the public or which constitutes mere hearsay.
- d. Information that relates to acts or omissions not covered by Article 2 of the Law.

On the other hand, during the processing of the file, the persons affected by the communication shall have the right (art. 39) to the presumption of innocence, the right of defence and the right of access to the file under the terms established by law. Like the

informants, they shall also have the right to have their identity preserved and the confidentiality of the facts and data of the procedure guaranteed.

Likewise, in accordance with the provisions of Article 31.2 of Law 2/2023, the person to whom the facts reported refer shall in no case be informed of the identity of the informant or of the person who has made the public disclosure.

## **11. RECORDING OF INFORMATION**

In accordance with the provisions of article 26 of the law, all parties obliged to have an internal information channel, regardless of whether they are part of the public or private sector, must have a register of the information received and the internal investigations to which they have given rise, guaranteeing, in all cases, the confidentiality requirements provided for in this law.

## **12. INDEPENDENT WHISTLEBLOWER PROTECTION AUTHORITY**

Members of Vincci Hoteles are informed that they may address their complaints directly or after prior notification through the Complaints Channel to the Independent Authority for the Protection of Whistleblowers (A.A.I.) through its External Information System or to the competent regional authorities, and in other countries than Spain, to the authority of the country in question.

In this regard, information on the communication procedure will be provided, once the A.A.I. is appointed and starts its activity, notifying the addressees of this Rule.

## **13. ANONYMISATION OF DATA**

In accordance with the provisions of Article 24 LOPDGDD, three months after the data have been entered into the System by any means, they must be deleted from the complaints system, unless the purpose of the storage is to leave evidence of the functioning of the model for the prevention of the commission of offences by the legal person.

Internal communications that have not been processed may only be recorded in anonymised form, without the obligation to block provided for in Article 32 of this Organic Law being applicable.

## **14. DATA PROTECTION**

Personal data obtained in the course of the complaint and the internal investigation shall be processed solely for the management and control of this Complaints Channel Standard.

The reports made shall be recorded in the Register of Processing Activities and the informant shall be informed of the collection and processing of their personal data, and how to exercise their rights of access, rectification, deletion, revocation of consent, limitation, portability and opposition by sending an e-mail to the address [dpd@vinccihoteles.com](mailto:dpd@vinccihoteles.com).

The data contained in the Complaints Channel system will be treated with due confidentiality, respecting data protection regulations, and will be deleted within three (3) months of the complaint being filed or when the legal proceedings arising from the complaint are concluded, if applicable. Personal data may only be kept in separate custody during the period of limitation of the liabilities related to the complaint, to be made available to the authorities, where appropriate.

Access to the personal data contained in the Complaints Channel (art. 32) shall be limited, within the scope of its competences and functions, exclusively to:

- a. The System Manager and whoever manages the system directly.
  - b. The human resources manager, only when disciplinary measures may be taken against an employee.
  - c. The person responsible for the legal services of Vincci Hoteles, should legal action be taken in relation to the facts described in the communication.
  - d. The persons in charge of the processing that may be appointed.
  - e. The data protection officer, where applicable.
- On the other hand, the identity of the informant may only be communicated (Art. 33) to the judicial authority, the public prosecutor's office or the competent administrative authority in the framework of a criminal, disciplinary or sanctioning investigation.

## 15. APPROVAL AND ENTRY INTO FORCE

These Regulations have been approved by the Administrative Body of Vincci Hoteles on the 9th of December 2.024, and shall remain in force until their modification is approved, and shall be communicated to the addressees of Regulations.these

## 16. REVIEW AND FOLLOW-UP

The Compliance Committee shall review this Standard on an annual basis, and shall inform Vincci Hoteles Members of any changes or updates that are made. Without prejudice to the foregoing, the review and updating shall be undertaken when the circumstances set out below, by way of example but not limitation, occur:

- ☐ Changes in the regulatory framework.
- ☐ Recommendations of the Independent Authority for Whistleblower Protection or other administrative authorities or supervisory bodies whose activity has an impact on the matters covered by this Rule.
- ☐ Modification of the organisational structure and general governance model of Vincci Hoteles with links to this Standard, as well as the Vincci Hoteles Criminal Compliance Committee.
- ☐ Changes in business objectives and strategy or management approach linked to the Compliance Policy and internal regulations with an impact on this Standard.
- ☐ Substantive amendments in related proceedings.
- ☐ When the result of its monitoring and control makes it advisable to modify actions to increase the degree of compliance or improve its impact on Vincci Hoteles or its employees and interested parties.

## 5. APPROVAL

DRAFTED	REVISED	APPROVED
Name: AUREN CONSULTORES S.P, S.L.P. and COMPLIANCE COMMITTEE Date: 09/12/2024	Name: Legal Department of Vincci Hoteles Date: 09/12/2024	Name: MANAGING BODY OF VINCCI HOTELS Date: 09/12/2024

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1ª	Dec 2024	First Edition General Revision Documentation