

STAYINGVALENCIA

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REPORTING CHANNEL PROTOCOL

IMPLEMENTATION DATE: 05/30/2024

LAST UPDATED DATE:

Concept

The reporting channel is the instrument through which the company receives and manages information provided by organization members regarding behaviors contrary to the code of ethics, corporate policies approved by the company, or the penal code.

OBJECTIVE OF THE REPORTING CHANNEL

The objectives pursued with the implementation of a reporting channel are:

- To prevent behaviors that violate the company's code of ethics and corporate policies.
- To detect behaviors that could constitute a crime within the company.
- To comply with the requirements of Article 31bis of the Penal Code.
- To implement a culture of compliance and good corporate practices.
- To avoid the commission of crimes within the organization.
- To achieve a compliance scenario that could lead to the exemption or mitigation of criminal liability for the company and the board of directors for crimes committed by organization members.
- To provide the company with mechanisms for awareness and control of potential non-compliant behaviors.
- To initiate the disciplinary process and impose sanctions on individuals who engage in behaviors contrary to the organization's compliance rules.
- To collaborate with the justice administration, if necessary.

REQUIREMENTS OF THE REPORTING CHANNEL

The reporting channel must meet the following guarantees:

- **Confidentiality:** Communication systems that are effective and ensure confidentiality will be used. Confidentiality of reports is a basic requirement for compliance with Directive 95/46/EC. It is essential that the whistleblower enjoys appropriate protection, guaranteeing the privacy of the report and preventing their identification, which is fundamental to fulfilling the purpose of the reporting channel and encouraging its use. Legal entities implementing reporting channels must adopt appropriate measures to ensure the confidentiality of the whistleblowers' identities and that they are not disclosed to the reported party during the investigation.

- **Anonymity of the Whistleblower:** The UNE 19601 standard allows for anonymous reporting. If the report is not anonymous, the anonymity of the whistleblower will be ensured.
- **Indemnity of the Whistleblower:** It is guaranteed that no retaliatory actions will be taken against the whistleblower.
- **Information:** All members of the organization must be informed about the existence and functioning of the reporting channel, confidentiality, anonymity, indemnity of the whistleblower, and that access to the channel is restricted and only accessible to the body designated by the company to manage the investigation of the report.
- **Training:** All organization members will be trained on how to properly formulate a report.
- **Evaluation:** A periodic evaluation of the functioning of the reporting channel must be conducted.
- **Communication:** The existence and functioning of the reporting channel must be communicated to the legal representatives of the workers (Article 64.5 of the Workers' Statute).
- **Disciplinary and Sanctioning Procedure:** Organization members must be informed about the disciplinary and sanctioning regime that adequately sanctions non-compliance with the code of conduct, corporate policies, and, if applicable, the commission of a crime. The UNE 19601 (clause 8.8) establishes the possibility of imposing sanctions that, depending on the degree of non-compliance, can range from a warning to disciplinary dismissal. Considering the limitations established in the Workers' Statute, it must be agreed with the workers that non-compliance with the code of conduct or corporate policies will be considered a breach of contractual good faith and thus a cause for disciplinary dismissal.
- **Instructor Body:** It must be appointed by the administrative body and ratified by the shareholders' meeting. Its actions must be objective, transparent, and impartial. It can be internal or external to the organization.
- **Resolution Body:** It must be appointed by the administrative body and ratified by the shareholders' meeting. It may or may not be the same as the instructor body. It can be internal or external to the organization.

REPORT HANDLING PROCEDURE

a) Definition of the Channel: The method of communication for reports will be determined, specifying an email address or postal address directed to the instructor body. All organization members must be aware of this email and/or postal address.

b) Formulation of the Report: The whistleblower will address the report to the following email address:

- canaldedenunciascompliance@belenguerabogados.com

The whistleblower must describe the subject of the report and provide any available evidence.

c) Reception of the Report: It must be documented in writing, recording all possible data.

d) Timeline: The date of receipt must be recorded in writing, and the deadlines for the process phases must be established:

- Preliminary Evaluation

- Preliminary Decision
- Instruction Phase
- Investigation Report
- Conclusions Report
- Communication to the Resolution Body

e) Preliminary Evaluation: The instructor will conduct a preliminary evaluation of the report's content to determine if it could lead to awareness of non-compliance with the code of conduct, corporate policies, or the commission of a crime.

f) Definition of the Framework of Action: The framework in which the reported subject should be addressed will be defined:

- Code of Conduct
- Corporate Policies
- Penal Code

g) Preliminary Decision: The preliminary decision will be defined according to:

- **Exclusion of Non-Compliance:** If the preliminary evaluation indicates no punishable non-compliance in any compliance framework, the report file will be archived, documenting the evaluation and qualification criteria. The whistleblower will be informed if their identity is known.
- **Non-Compliance with Internal Rules:** If the reported behavior involves non-compliance with the code of conduct or corporate policies, it will be referred to the relevant area: labor, administrative, etc.
- **Indications of Crime:** If the report provides rational indications of a crime, the instruction phase will commence.

h) Instruction Phase: Evidence from involved persons will be collected, interviews will be conducted, documents from other departments of the company will be requested, etc., and a thorough analysis of the collected data will be carried out, ensuring the whistleblower's anonymity is preserved at all times.

i) Investigation Report: Upon conclusion of the instruction and investigation phase, the instructor will issue a report detailing the facts and the investigative actions taken.

j) Conclusions Report: The instructor will issue a reasoned and motivated conclusions report, which will be sent to the Compliance Committee, the Compliance Officer, and the Administrative Body.

k) Resolution Body: The resolution body will consist of the Compliance Officer and the Compliance Committee if appointed. The individual who is the subject of the report will be excluded from the resolution body.

l) Sanction Proposal: The resolution body will propose a sanction based on the severity of the investigated facts and the reached conclusions and will recommend to the administrative body that the facts be reported to the judicial authority, initiating the post-criminal actions protocol. In any case, the final decision will rest with the administrative body.

NOTICE OF INTEREST

All organization members are informed that the use of their computer equipment, email, etc., is reserved exclusively for professional purposes and that the company may access these systems if there are indications of a crime and/or an internal report has been filed in accordance with this protocol.

Reporting Form

- **Whistleblower (if not anonymous)**
 - Name
 - Department
 - Reporting Method
 - Reporting Date

- **Reported**
 - Name
 - Department

- **DESCRIPTION OF REPORTED FACTS**
- **EVIDENCE PROVIDED**