

**INTERNAL MANAGEMENT PROCEDURE FOR THE COMPLAINTS CHANNEL  
OF FAS SPAIN S.L.**

**DATE 09-10-2023**

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## 1. INTRODUCTION

FAS SPAIN S.L. has implemented a Code of Ethics or complaints in which it establishes the ethical and action principles with which it is committed in its business activity and defines the framework of behavior to be followed by the Members of the Organization in the development of their professional performance.

In the desire to provide an adequate response to any doubt, discrepancy or irregularity in compliance with said Code, as well as to collaborate in monitoring compliance with all the rules applicable to this entity and its Members, this Ethical Channel is activated or of complaints as a channel of communication and knowledge, through the procedure regulated in this document.

The Ethical Channel is, therefore, a confidential and transparent means of communication so that both the Members of our entity, as well as other interested parties of the same, have an adequate channel to report those behaviors that may lead to any irregularity or any act contrary to the law or the rules of behavior of the Code of Ethics and other applicable internal rules, whether committed by other Members of the Organization or by representatives or employees of companies that collaborate with our entity in its different activities.

Its purpose is to establish the necessary mechanisms to communicate and manage early any issue related to the scope, compliance or interpretation of the regulations applicable to the Organization, as well as, especially, those behaviors from which a crime could arise that could lead to **criminal liability for the legal entity**.

The objective of this document is to develop the procedure of this communication channel.

## 2. DEFINITIONS:

The definitions of those terms that are frequently used in this document are listed below:

- . **Communication:** declaration by which any Member of the Organization, Business Partner or Third Party records a question about the scope, interpretation or

compliance with the regulations applicable to the Organization. Depending on its content, a communication may contain a query or a complaint.

- . **Consultation:** communication by which any Member of the Organization, Business Partner or Third Party requests a clarification, response or criterion regarding the scope, interpretation or compliance with the regulations applicable to the Organization.
- . **Complaint:** communication regarding a possible breach of the regulations applicable to the person responsible for the internal information system.
- . **Reported:** natural or legal person who is accused of an alleged non-compliance that is the subject of investigation by the person responsible for the internal information system of **FAS SPAIN S.L.**
- . **Informant:** natural or legal person with access to the Ethical Channel who makes a complaint.
- . **Breach:** behavior, active or omissive that involves the violation of the regulations applicable to the **FAS SPAIN S.L.**. A non-compliance may be more or less serious, ranging from mere formal non-compliance with a requirement included in an internal standard to the commission of acts constituting a crime potentially attributable to the Organization.
- . **Members of the Organization:** the members of the Administration body, directors, employees, temporary workers or employees under a collaboration agreement, and volunteers of the Organization and the rest of the people under hierarchical subordination of any of the above.
- . **Responsible for the Internal Information System:** A single-person or collegiate body, endowed with autonomous powers of initiative and control, which is entrusted, among other tasks, with the responsibility of supervising the proper functioning of the Organization's Compliance Management System in general.
- . **Business partners:** any legal or natural person, except the Members of the Organization, with whom the Organization maintains or plans to establish some type of business relationship. By way of example, but not limitation, intermediaries such as agents or commission agents, external advisors, suppliers, clients are included.
- . **Subjects affected by this document:** all Members of the Organization as well as Business Partners or Third Parties who have a business relationship with **FAS SPAIN S.L.**
- . **Third:** natural or legal person or body independent of the Organization.

### 3. AREA OF APPLICATION

This complaints channel is established so that the different interest groups such as Senior Management, Employees, partners, shareholders, people who belong to the organization's administrative body, suppliers, representatives of society in general, any person who works for or under the supervision and direction of contractors, subcontractors and suppliers, etc., with whom the Organization relates in a work or professional context, can communicate their doubts, suggestions, possible irregular conduct or any breach of the rules contained in the Code of Conduct, Anti-Corruption Policy or other internal or external regulations.

It is a confidential and even anonymous channel through which any irregular behavior that is taking place within the Organization can be communicated:

The Ethics or complaints Channel must be easily visible on the website of our entity and easily accessible to the members of our entity and/or, failing that, in a visible place in the physical center where the company operates.

#### **4. MANAGEMENT OF THE ETHICS OR COMPLAINTS CHANNEL**

The ethical or complaints channel is a channel hosted on an external web platform that meets the highest standards of confidentiality and information security, and also allows the anonymity of complaints and/or queries.

The management of the Ethics or Whistleblowing Channel corresponds to an external company with which the relevant service provision contract has been formalized and which complies with the canons of confidentiality and security in the information received through the whistleblowing channel. Said entity must assume the tasks detailed below:

- a. Reception, verification and processing of communications received.
- b. Management and maintenance of the file of cases received and files generated.
- c. Review and control of the operation of the Ethics Channel or complaints.
- d. Periodic update of the Procedure.
- e. Maintaining the record book of the information received and the internal investigations to which it has given rise.

#### **5. REGULATORY PRINCIPLES OF THE ETHICAL CHANNEL**

- I. **Obligation to communicate:** The Members of our entity, as well as other interested parties in it, who have rational and reasonable indications of the commission of an irregularity or any act contrary to the law, or to the applicable internal rules that the Organization voluntarily adopts, must notify the Responsible for the internal information system.

In the case of people who maintain an employment relationship with the Organization, a commercial relationship or the development of a service, this obligation is considered an essential part of good faith in contractual compliance. Therefore, all employees have the obligation to inform the person responsible for the internal information system of any data or indication that a breach of the applicable regulations may have been or may be committed.

II. **Confidentiality guarantee:** The identity of the person who notifies a breach through the Ethical Channel will be treated as confidential information, and may even be anonymous. Therefore, it will not be revealed to those who may be immersed in a verification process.

The data of the people who make the communication may only be revealed to the administrative or judicial authorities, to the extent that they require it as a consequence of the procedure derived from the object of the communication, as well as to the people involved in any subsequent investigation or procedure. judicial process initiated by and as a consequence thereof. The transfer of data will be made in accordance with the provisions of the legislation on the protection of personal data.

III. **Promotion of the Ethical Channel:** Our entity will promote the dissemination of the existence of this complaints channel for the benefit of better functioning of its services, for which it appreciates and promotes its use.

IV. **Whistleblower Protection:** The report, whether made by people outside of or linked to the Organization, is a conduct that the Organization promotes and appreciates, for the benefit of the best performance of its business activity, so it cannot give rise to any negative consequences for the informant. .

V. **False complaints:** A false report will be understood as: (1) one that is not based on facts or indications from which an anomalous fact or irregular behavior can reasonably be derived; (2) the formulated even when the author is aware of the falsity of the facts and/or voluntarily distorts them. In the event that, as a result of the investigation, it is proven that a complaint has been filed in bad faith based on false or distorted data, it will be verified whether there is an employment relationship with the informant and, if applicable, notify the Director or person in charge. of Human Resources to adopt the disciplinary measures it deems appropriate.

## 6. RECEPTION OF COMMUNICATIONS

Communications to the Ethics Channel or complaints can be sent through various channels:

- a. **Email:** [lgpd@hotelalanda.com](mailto:lgpd@hotelalanda.com)
- b. **Web:** [alandamarbellahotel.com](http://alandamarbellahotel.com)
- c. **Via telephone:** 673421251
- d. **Postal Address:** NATIONAL ROAD 340 Km 176.6, 29602, MARBELLA (MALAGA)

For the attention of ANA LOPEZ BENITEZ

## 7. COMPLAINTS MANAGEMENT SYSTEM

It includes the computer tools enabled by FAS SPAIN S.L. to record and archive the communications received and the documentation generated in the processing process.

The Complaint Management System of FAS SPAIN S.L. has the necessary technical and organizational security measures to guarantee the highest possible level of confidentiality. The information containing sensitive personal data will be treated with appropriate security measures in accordance with the provisions of Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights and the EU Regulation. 2016/679 of the European Parliament and of the Council of April 27, 2016 regarding the protection of natural persons (hereinafter, RGPD).

The person responsible for the Internal Information System will keep an updated list of people with the capacity to access the information contained in the Complaints mailbox, with an expression of the actions they can take, if deemed appropriate. Access to the data contained in processing documents of the complaints channel will be limited exclusively to personnel who carry out the compliance functions, internal audit of the Organization and, in due course, the external audit.

## **8. PROCESS FOR PROCESSING COMMUNICATIONS RECEIVED**

The processing of communications received must be carried out respecting the following phases:

1. Reception of communication.
2. Preliminary analysis of its content.
3. Admission to the procedure.
4. Record.
5. Acknowledgment of receipt.
6. Transfer or delegation.
7. Instruction or verification of the facts.
8. Resolution and proposal for action.
9. Communication of the Resolution to those affected.
10. Closing of the File and preparation of reporting reports to the governing bodies.

### **8.1 Reception of communication.**

Communications from the Ethical Channel can be received through the different means of access to the Channel reflected in section 5 of this procedure.

Once the communication is received, the person responsible for the internal management of the complaints channel will inform the person responsible for the Internal Information System, who will act based on its content as follows:

- . If the content of the communication is a query, the Head of the Internal System

- Information will respond as soon as possible to the questions raised, by the same means by which the query was communicated;
- . If the content of the communication is a query, the Head of the Internal Information System will respond as soon as possible to the questions raised, by the same means by which the query was communicated;

## **8.2 Preliminary analysis of its content.**

Any communication that refers to a possible non-compliance (that is, a complaint) must be the subject of a preliminary analysis by the Person Responsible for the Internal Information System to decide on its possible admission and registration or rejection.

The person responsible for the Internal Information System will document the reasons for admitting to processing and registering or rejecting a communication related to a possible non-compliance, through a file, which may contain, depending on the case, the following information:

- . Descriptive name of the complaint, stating its unique reference number and its date of receipt.
- . Summary of data provided in the complaint, with the discrimination of objective data and subjective data.
- . Analysis of the information and documentation sent with the complaint.
- . Assessment of the content of the complaint and the reliability of the informant. The anonymity of the informant will be treated, in principle, as an indication of less credibility of the reported facts.
- . Decision on the admission of the complaint for processing, with expression, if considered appropriate, of the actions to follow.
- . Exceptional measures adopted, in the event that the Head of the Internal Information System has considered them necessary or convenient for reasons of urgency.
- . Designation of the responsible instructor, if it is deemed appropriate to delegate this function, by the person responsible for the Internal Information System.

In this preliminary analysis, the convenience of sending to other entities of the entity information that is not the subject of this Channel or that has a different and specific procedure, if appropriate, will be assessed.

If it is a communication that affects an action by Partners of our entity, it will be verified in collaboration with the area that maintains the dialogue with said Partner and, where appropriate, it will be sent to the person responsible for the Internal Information System who perform similar tasks in that entity.



In the case of communications in which a malfunction of any Department or Area of the Organization or a breach of commitments to clients is revealed, the channels established to deal with this type of complaints or claims will be used, informing of their transfer to the informant.

It will also be decided whether the instruction should be added to other similar procedures already in progress.

### **8.3 Admission to the procedure.**

In order to be admitted for processing, complaints must contain:

- . The events or behaviors it affects, and its impact on the Organization, the informant, colleagues, Business Partners, or Third Parties.
- . The elements of accreditation or proof available (documents, witnesses, etc.).

The lack of identification of the informant will not be sufficient to rule out the processing of a complaint.

In the event that the communication was anonymous, the person responsible for the internal information system, due to due diligence, will consider undertaking a verification of the facts or rejecting them without further formalities. To do this, you must evaluate the appearance of veracity of the complaint and the data or indications it provides. In any case, you must document your decision in writing.

No complaint will be processed in which, clearly, the action that is the subject of the complaint does not constitute conduct that may imply the commission of any irregularity or any act contrary to the law or the standards of behavior included in the Code of Ethics.

### **8.4 Record.**

Complaints accepted for processing will be recorded in a record book with a unique reference number so that they can be easily located, completing a standardized registration format.

## **8.5 Acknowledgment of receipt.**

Once the preliminary analysis of the complaint has been carried out, if the informant is correctly identified, the person responsible for the internal information system will proceed to acknowledge receipt, with information in any of these senses: Regardless of the categorization of the communication , by the person responsible for the Internal Information System, acknowledgment of receipt of their communication will be sent to the informant within a maximum period of 7 calendar days from receipt.

If the complaint is considered irrelevant, inadmissible or not related to the purposes of this Procedure, an informative notification will be sent to the informant.

Likewise, the informant must be informed of the transfer to other channels enabled for the processing of commercial or other complaints or claims.

If the informant decides to make an anonymous report without providing any contact email, at the end of the communication process they will receive information in a pop-up window with the acknowledgment of receipt of that report in which they will be assigned a reference number so that they can obtain information about it in future communications.

We warn you that if the informant does not provide a contact email, which should not necessarily be their identification, they will not be able to receive communications from our entity about the processing status and other communications, although do not worry because we will respond within the deadline. legally established, and you may have access to the follow-ups carried out on your complaint by accessing through the link [dabocanaldenuncia.com/ALANDAHOTEL](http://dabocanaldenuncia.com/ALANDAHOTEL) with the same username and password with which you filed your complaint and including the identification number of the same.

When the complaint is considered relevant, but its content is insufficient, incomplete, or does not provide the necessary detail so that the investigation of the file can begin, then a notification will be sent informing the informant of the acceptance of the communication and requesting the information. additional necessary.

When the complaint is pertinent, and the information or documentation provided is

sufficient for the beginning of the corresponding investigation of the file, then a notification will be sent informing the informant about the beginning of the management of the corresponding investigation.

FAS SPAIN S.L. must guarantee at all times the confidentiality of the informant and the absence of retaliation for complaints made in good faith. Therefore, the identity of the informant or those circumstances that make him identifiable to the accused will be excluded from the information provided to the accused in the exercise of his right of access.

The period for acknowledging receipt of complaints to informants should not exceed seven calendar days.

However, when there is a significant risk that such communication would jeopardize the effective investigation of the facts that are the subject of the complaint or the collection and analysis of the necessary evidence, the person responsible for the internal information system may include in the file a justification for written part to ignore this communication.

#### **8.6 Transfer or delegation.**

The person responsible for the internal information system may delegate all or part of the investigation phases or request the support of specialists from the Areas or subsidiary companies to help him with the investigation of the complaints, if any.

These instructors must maintain confidentiality and professional secrecy in their intervention and respect in all cases the principles of this procedure.

If a complaint received in the Ethical Channel falls within the scope of competence of the Confidential Advisory Department on sexual harassment, the person responsible for the internal information system will promptly transfer it to the aforementioned Confidential Advisory Department for processing. The confidential consultancy will inform the person responsible for the Internal Information System of the closure of its procedures so that they can include them in their reports to the governing bodies.

If at any time during the processing you become aware of the existence of

actions in the judicial or administrative field for the same facts, the person responsible for the internal information system may agree to suspend the action of the Ethical Channel and resume it if there are relevant aspects not decided in those.

### **8.7 Instruction or verification of the facts.**

The person responsible for the internal information system must make the accused aware of the content of the complaint that affects him, giving him the opportunity to present and prove his position regarding its content.

The instruction will be carried out by the person responsible for the internal information system or the person or persons designated by him for this purpose, depending on the type of complaint and the verifications that are necessary. During the course of the instruction, the following actions may be carried out:

**8.7.1.** Request for clarification/additional information: in cases where it is necessary, it will require the person who made the communication to clarify or complement it, providing the documents and/or data that may be available to prove the existence of the action or conduct. irregular.

**8.7.2.** Verification of the truthfulness and accuracy of the communication in relation to the conduct described, respecting the rights of those affected. All Members of the Organization are obliged to collaborate loyally during the verification process. The interventions of witnesses and affected parties will be strictly confidential. Notes or reports may be requested from affected Departments or Areas.

**8.7.3.** Interview with the accused: respecting their rights, they will be informed of the content of the communication so that they can present their version of what happened and can provide the means of proof available to them. Likewise, private interviews will be held with all people who could be involved. In any case, written minutes will be drawn up, which must be signed by the participants at the end of the meetings.

**8.7.4.** Taking into account the nature of the facts investigated, interviews may be carried out with the presence of a witness (hierarchical superior, teammate or other person deemed appropriate). In this case, the witness will also have to sign the minutes of the meetings.

**8.7.5.** Expert reports from internal or external professionals.

**8.7.6.** Access to documents related to the reported event, including corporate emails of the accused, in accordance with the standards established for this purpose.

**8.7.7.** Other actions that are deemed necessary during the processing.

Of all the instruction sessions and interviews carried out during the course of the instruction, the person responsible for the internal information system or, where appropriate, the instructor, must leave a written record.

In the case of formal meetings, at the end of each meeting, a summary note will be signed with the agreement, if possible, of all those present.

## **8.8 Resolution and proposal for action**

Once the instruction process is completed, the person responsible for the internal information system will write a report and a conclusion or resolution. If an instructor has intervened, he or she will present a signed report with his proposed resolution, which must also be ratified with the signature of the person responsible for the internal information system. The resolution document must contain, at a minimum, the following points:

**8.8.1.** Description of the reported case.

**8.8.2.** Actions carried out during the investigation of the file, as well as any relevant documentation analyzed and that may provide evidence to support the conclusions.

**8.8.3.** Results obtained in the research.

**8.8.4.** Assessment or qualification of proven facts.

**8.8.5.** Proposal, if applicable, of corrective measures, directed to whoever has the capacity to decide and execute them.

The procedure must be completed in the shortest possible time, not exceeding three months from the receipt of the communication or, if an acknowledgment of receipt was not sent to the informant, three months from the expiration of the period of 7 days after of communication is made, except in cases of special complexity that require an extension of the period, in which case, it may be extended up to a maximum of another 3 additional months.

If the resolution concludes that a Member of the Organization has committed any non-compliance, corrective measures will be applied and, where appropriate, the Director or person responsible for the Human Resources Area will be notified to apply the corresponding disciplinary measures or , if applicable, to the Director of the Legal Advice Area.

If the involvement is of a Business Partner providing goods, services and/or supplies, the person responsible for the internal information system will inform the Department or Area that carried out the contract or that is responsible for compliance with its commitments.

Regardless of the previous measures, if the proven actions had

In relation to an administrative or judicial action, whether or not the Organization is a party, the Legal Department, if any, and the competent authorities will be immediately informed.

When the content of the complaint or its investigation reveals the possible existence of relevant criminal liabilities that may affect the Organization, the person responsible for the internal information system must immediately inform the entity's administrative body, being responsible for making the pertinent decisions regarding the complaint, once it has received an adequate report on its content.

In the event that it is proven that a complaint has been filed in bad faith based on false or misrepresented data by an employee, this will be brought to the attention of the Director or person responsible for Human Resources so that he or she can adopt, where appropriate, the measures disciplinary measures that he deems appropriate.

#### **8.9 Communication of the resolution to those affected**

The person responsible for the internal information system will communicate in writing the completion of the instruction to the informant and the accused and its assessment, indicating whether or not there has been a breach of the regulations applicable to the Organization and, in particular, its Code of Ethics.

#### **8.10 Closing of the file and preparation of the record book**

In any case, a record book without personal data will be created from the communications received, qualification and resolution, to undertake the corresponding studies and reports, and promote the correction of situations where appropriate.

### **9. PROTECTION OF PERSONAL DATA**

#### **PRIVACY CRITERIA OF THE ETHICAL OR COMPLAINT CHANNEL**

##### **1. Object**

The objective of this section of the Ethics Channel or complaints procedure is to inform the communicators of the data processing that will be carried out for the management and processing of complaints submitted through it. For these purposes, the privacy criteria of the Ethical Channel will also be defined on the page

corporate web.

For the correct configuration and design of the Ethical Channel, the Organization fully complies with the applicable regulations on data protection; in particular Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and its development regulations.

Likewise, the Ethical Channel has been designed in accordance with Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights.

## **2. Processing of your personal data and legitimacy**

The purpose of the Ethics or Complaints Channel is to manage the notifications received about non-compliance with the regulations applicable to FAS SPAIN S.L., committed by Members of the Organization or Business Partners, carry out the investigation of the reported events and adopt the pertinent corrective measures.

This is a channel of confidential communication between Members of the Organization, Business Partners and Third Parties, linked to the Organization.

The information contained in the Channel will be deleted three months from the resolution of the file and will be canceled once the legal deadlines have elapsed during which administrative or judicial procedures could arise for the legal entity and, in any case, not before 10 years. if the complaint is related to money laundering or terrorist financing.

Legitimation is given by consent, which has been given and collected through the Ethical Channel.

## **3. Data recipients**

Only the person responsible for the internal information system of FAS SPAIN S.L., as well as the collaborators authorized by him, will have access to the information sent by the interested party (except when management of commercial operations is requested in which the affected departments or areas must intervene). )

The data will not be transferred to Third Parties, except legal obligation, in which case the information will be available to Public Administrations, Judges and Courts, for the attention of possible liabilities.

#### **4. Exercise of rights**

At any time, the interested party may exercise the rights of access, opposition, rectification and deletion in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council and Organic Law 3/2018, of December 5.

In certain circumstances, interested parties may request the limitation of the processing of their data, in which case they will only be kept by the Ethics Channel for the exercise or defense of claims.

When technically possible, the interested party may request the portability of their data to another controller.

To exercise these rights, in accordance with current legislation, interested parties can use the email [accountlgpd@hotelalanda.com](mailto:accountlgpd@hotelalanda.com) attaching a copy of an accreditation document (DNI or Passport) and expressly indicating the right requested.

The interested person may file a claim with the Spanish Data Protection Agency, especially when they are not satisfied with the exercise of their rights. For more details, consult the website. <https://www.aepd.es>.

#### **5. Principle of proportionality and data minimization**

- . The personal data collected within the framework of the Ethical Channel: Its use will be limited to what is strictly and objectively necessary to process the complaints and, if appropriate, verify the reality of the reported facts;
- . They will be processed at all times in accordance with the applicable data protection regulations, for legitimate and specific purposes in relation to the investigation that may arise as a result of the complaint;
- . They will not be used for incompatible purposes;
- . They will be adequate and not excessive in relation to the aforementioned purposes.

#### **6. Limitation on data access**

Access to the data contained in these systems will be limited exclusively to the



bodies that are entrusted with the task of developing the compliance functions, the entity's internal audit and, when appropriate, external audit.

Only when disciplinary measures could be adopted against a Member of the Organization, will personnel with Human Resources management and control functions be allowed to process the data.

Likewise, and as indicated, the Organization may use the support of professional third parties, outside the Organization, for the provision of certain services related to the management of the Ethical Channel.

## **7. Security and confidentiality measures**

The Organization will ensure that all necessary technical and organizational measures are taken to preserve the security of the recorded data in order to protect it from unauthorized disclosure or access.

To this end, the Organization has adopted appropriate measures to guarantee the confidentiality of all information and will ensure that data relating to the identity of the informant are not disclosed to the accused during the investigation, respecting in all cases the fundamental rights of the person. , without prejudice to the actions that, where appropriate, the competent judicial authorities may adopt.

## **10. COMPLIANCE FUNCTION COMMITMENTS**

The person responsible for the internal information system, as well as, in his support, the people who have acted by his designation, and any person who intervenes in the management and processing phases of the Ethical Channel or in the processing of communications, must carry out the work. with the utmost diligence and confidentiality, refraining from revealing information, data or background to which they have access in the exercise of their task, as well as from using it for their own benefit or that of a Third Party.

The person responsible for the internal information system and any person who collaborates in the management procedure of the Ethical Channel must refrain from acting if, due to the people affected by the communication or the matter in question, a conflict of interest arises, communicating it. to the administrative body of the entity and assigning the processing to a qualified person in which said situation does not occur.

## **11. RELATIONSHIP WITH OTHER CURRENT PROCEDURES**

This Ethical Channel should not interfere in the procedure of the Confidential Advisory Office in charge of processing cases of sexual harassment and/or violence, which will continue to be governed by its specific regulations.

## **12. COMPLIANCE STATEMENT**

Since compliance with ethical norms and standards commits the entire Organization and constitutes a strategic objective for it, it is expected that all personnel know and respect the content of this Procedure.

FAS SPAIN S.L. will react immediately to possible non-compliance with the provisions of this Procedure, in accordance with the provisions of its internal regulations and within the parameters established in current legislation.

## **13. APPROVAL, ENTRY INTO FORCE AND UPDATE**

This Ethics Channel procedure has been approved by the administration and management body at its meeting on 09-10-2023.

From that moment on it is fully in force in all its terms.

This Ethical Channel procedure must be kept updated over time. To do this, it must be reviewed on an ordinary basis on an annual basis, and on an extraordinary basis, whenever variations occur in the strategic objectives or applicable legislation.

It is the responsibility of the person responsible for the Internal Information System to evaluate any modification proposal.

**CHANGE CONTROL**

Version 1.0 approved by the Administration body

<b>Version</b>	<b>Modification date</b>	<b>Purpose of the Modification</b>	<b>Affected sections</b>
<b>2.0</b>			
<b>3.0</b>			
<b>4.0</b>			