



# General Policy regarding the Internal Information System and informant protection

(Corporación Masaveu, S.A. and Dependent Companies)

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# 1. Introduction and purpose

With a view to promoting an information and communication culture as a mechanism to prevent and detect conduct constituting a crime, and in compliance with *"Law 2/2023, 20 February, regulating the protection of persons who inform about breaches of regulations and the fight against corruption"* The Corporación Masaveu Group has set up an Internal Information System.

The Board of Directors of Corporación Masaveu, S.A., the parent company of the Group, is responsible for implementing the Internal Information System and ensuring the application of its principles, contained in a general policy, in all of the companies in the Group, without prejudice to the autonomy and Independence of each company which, where appropriate, may establish a respective corporate governance or group governance, and the modifications or adaptations which may be necessary in order to comply with the applicable regulations in each case.

Therefore, it corresponds to the Board of Directors of Corporación Masaveu, to approve this "General Policy regarding the Internal Information System and informant protection", therefore fulfilling its task of laying the basis, providing the tools and designing the mechanisms required for an adequate and efficient coordination of the activities related to the management of reports; without prejudice to the autonomous decisions taken by each company in the Group in accordance with the legislation in the country where it operates and the particular needs of its line of business.

## 2. Scope of application

### 2.1. Material scope

The information processed through the Internal Information System will deal with actions or omissions that may constitute certain infringements of European Law<sup>1</sup>, or serious or very serious criminal or administrative infringements, including amongst these in all events, those which involve economic losses for the Public Treasury and the Social Security.

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<sup>1</sup> Acts or omissions that may constitute infringements of European Law within the scope of application of European Union laws listed in the Annex to Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October of 2019, on the protection of persons who report breaches of Union Law, irrespective of their classification in the internal legal order and those that affect the financial interests of the European Union as specified in article 325 of the Treaty on the Functioning of the European Union (TFEU) or affecting the internal market, as defined in article 26, section 2 of the TFEU, including infringements of norms of the European Union competition policies and aids granted by Member States, as well as infringements related to the internal market in connection with acts that infringe corporate tax rules or practices intended to obtain a tax advantage that would undermine the object or purpose of the legislation applicable to corporate taxation.

## 2.2 Personal scope

The Internal Information System shall allow people that, in a work or professional context, become aware of the infringements defined in section 2.1. to report such breaches, including in any case:

- Employees, volunteers, interns and trainees.
- The self-employed.
- Shareholders, participants and people belonging to the administrative, management or supervisory body of the company, including non-executive members.
- Any person working for or under the supervision and direction of contractors, subcontractors and suppliers.
- Those who have maintained an employment or statutory relationship.
- In cases in which the information on violations has been obtained during the selection process or pre-contractual negotiation, those persons whose employment relationship has not yet begun.

## 2.3 Corporate scope

This policy applies to all the companies in the Corporación Masaveu Group (hereinafter "Corporación Masaveu Group" or "the Group").

For the purposes of this regulation, "Corporación Masaveu Group" is understood to be: Corporación Masaveu, S.A. (hereinafter "Corporación Masaveu" or the "Company") and those companies in whose capital the Company holds, directly or indirectly, a majority of shares, stakes or voting rights, or in whose governing or administrative body it has appointed or has the power to appoint a majority of its members, such that it effectively controls the company.

## 3 Definitions

- Internal Information System: System consisting of the internal communication channel (hereinafter Ethical Channel), the person responsible for the system and the procedures that establish how to manage and follow up on the information received.
- Infringements: Actions or omissions that are unlawful or undermine the object or purpose of the rules, within the material scope of application contained in section 2.1.
- Information on infringements: Information, including reasonable suspicions, about actual or potential infringements, which have occurred or are very likely to occur in the organization in which the informant works or has worked or in another organization with which the informant has been in contact for work purposes, and about attempts to conceal such infringements.
- Complaint: the communication of information about breaches.
- Complainant or informant: A natural person who reports information on infringements obtained in the context of their work activities.

- Person concerned: A natural or legal person mentioned in the complaint as the person to whom the infringement is attributed or with whom the infringement is associated.
- Work context: The current or past work activities through which, regardless of the nature of such activities, people may obtain information on infringements and in which those individuals may suffer reprisals if they disclose such information.
- Act of reprisal: "Any acts or omissions that are prohibited by law, or that, directly or indirectly, result in adverse treatment which put people who suffer them at a particular disadvantage with respect to others in a work or professional context, solely due to their status of informants, or for having made a public revelation". Examples of what could be considered reprisals are: suspension of the employment contract, dismissal or termination of the employment or statutory relationship, including non-renewal or early termination of a temporary employment contract once the trial period has finished, or early termination or cancellation of contracts for goods or services, the imposition of any disciplinary measure, demotion or denial of promotion and any other substantial modification of working conditions and failure to convert a temporary contract into a permanent one, in the event that the worker had legitimate expectations that they were to be offered a permanent job; unless these measures were carried out as part of the regular exercise of management powers under labour law or the corresponding public employee statute, due to circumstances or facts of proven infringements, and unrelated to the presentation of the communication. Also damages, including those of a reputational nature, or economic losses, coercion, intimidation or harassment; negative evaluation or references regarding work or professional performance; inclusion in black lists or dissemination of information in certain sectoral areas, which hinder or prevent access to employment or the hiring of works or services; denial of training and discrimination, or unjust or unfair treatment<sup>2</sup>.
- Follow-up: Any action taken by the recipient of a complaint or any competent authority in order to assess the accuracy of the allegations made in the complaint and, where appropriate, to resolve the reported violation including using measures such as internal investigations, inquiries, legal proceedings, recovery actions or filing of the procedure.
- Response: The information provided to complainants on the measures planned or adopted in order to follow up on their complaint and the reasons for such follow up.
- Competent Authority: Independent Authority for the Protection of the Informant (A.A.I.) or competent regional authorities or bodies.
- False complaint: A false complaint shall be considered to be that which meets the following requirements simultaneously after the procedure has been investigated: (i) That it lacks justification and basis (ii) that its presentation has been made in bad faith by the informants for the sole purpose of causing harm.

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<sup>2</sup> Art.36.2. Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.

## 4 Guiding principles

The procedure for receiving, processing, resolving and registering communications of reports received in the Internal Information System of Corporación Masaveu Group shall be governed by the following guiding principles:

- Anonymity: If they wish so, the informant may request anonymity when making their report. Notwithstanding the selection of this option, the informant may maintain two-way communication with the Head of the Internal Information System, offering the possibility of submitting the documentation to support the facts reported, through the field created for this purpose in the Ethical Channel.
- Good Faith: the informant must act in good faith, and provide all the data and documents available to them in relation to the reported facts. Communications made in bad faith may arise in disciplinary/ sanctioning measures, as appropriate, for the informant.
- Information: The informant shall have the right to know the status of the processing of their complaint and the results of the investigation. The reported person shall have the right to be informed about the resolution, dismissal or filing of the complaint, if applicable, without this implying the disclosure of the identity of the informant and other people affected by the report.
- Confidentiality: The actions and proceedings shall be carried out with the utmost caution and discretion in order to guarantee the confidentiality of the identity of the informant and of any third party mentioned in the report.
- Data Protection: The mechanism and procedures, recording and processing of reports, mentioned in this Policy, adhere to the data protection regulations in force, as well as to information security standards. Likewise, the informant and the reported person will be informed about the processing of their personal data within the framework of the use of the Ethical Channel.
- Diligence: The investigation and resolution of the conduct reported must be carried out without undue delay, so that the procedure can be completed in the shortest possible time whilst respecting the due diligence.
- Contradiction: The procedure must guarantee a fair hearing and fair treatment for all persons concerned. All parties involved must seek the truth and the clarification of the facts reported in good faith.
- Prohibition of reprisals: Acts constituting reprisals, including threats of reprisals and attempts of reprisals against people who make reports are expressly prohibited. The prohibition of reprisals, in any form, is extended to any person who assists the informant in the complaint procedure and whose assistance must be confidential, including union or employee representatives, any third party related to the complainant who may be subject to reprisals in a professional context, and legal persons or similar entities owned or controlled by the complainant, for whom the complainant works or with whom the complainant is professionally related. The prohibition of reprisals shall not prevent the adoption of appropriate disciplinary measures when the internal investigation determines that the report is false and that the person who made the report was aware of its falsity, having acted in bad faith.
  
- Independence: The person in charge of the Internal Information System shall perform their functions independently and autonomously, not receiving instructions of any kind in the exercise of their powers. Furthermore, they shall count on all of the personal and material means required to carry them out.

- Protection of the affected person: Those people related to the reported facts shall maintain all their rights of judicial protection and defence, access to the file, confidentiality and protection of identity and presumption of innocence.
- Prevention of abusive use: Abusive use and use of the ethical channel in bad faith may expose the complainant to possible disciplinary or legal proceedings.

## 5 Rights and guarantees of the informant and the reported person

### 5.1 Rights and guarantees of the informant

The informant has the following rights and guarantees:

- To submit a written communication and decide if it shall be anonymous or not.
- To not reveal their identity to the third parties, except in the cases specified in the implementing legislation<sup>3</sup>.
- To provide an address, email address or safe place to receive notifications from the Regulatory Compliance Unit for the purpose of the investigation.
- To forego if relevant, to receive further notifications.
- To exercise the rights conferred by personal data protection law.
- To learn the status of the processing of their complaint and the results of the investigation.
- To consult the external information channels defined in section 12 of this policy.

### 5.2 Rights and guarantees of the affected person

The person affected by the complaint has the following rights and guarantees:

- The right to be notified, as soon as possible, about their involvement in an investigation process, fruit of the complaint made against them or their actions. The aforementioned complaint shall contain the following minimum content: the body in charge of managing the complaint, the reported facts, the rights to which they are entitled for processing the complaint.
- The right to present written allegations, including means of proof considered appropriate and relevant.
- The right of access to the file, without revealing information that could identify the informant and other people affected by the complaint, in order to guarantee the right of defence of the affected person. They shall also have the right to correct their personal data if they were incorrect or incomplete.

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<sup>3</sup> Law 2/2023, of 20 February, regulating the protection of people who inform about legislation breaches or the fight against corruption.

- The right to be informed about the ruling, dismissal or closing of the complaint, where appropriate.

## 6 Means of communication

The Internal Information Channel (hereinafter the Ethical Channel) shall be accessible through:

- The website
- By Post:
  - A/A UNIDAD DE CUMPLIMIENTO NORMATIVO
  - c/ Cimadevilla 8
  - 33003 Oviedo (Asturias)
- Intranet and the Employee Portal

In accordance with applicable legislation<sup>4</sup>, the Internal Information System is comprised of the different internal information channels that exist within the Group, such as, for example, those established to consult or report infringements of the Code of Conduct and the Regulatory Compliance Model of the Group, money laundering and terrorist financing breaches or harassment situations, of any nature, occurring in the workplace.

The Ethical Channel shall be unique for all of the companies in the Corporación Masaveu Group, however, depending on the facts reported, they may be sent to different units responsible for their ruling.

Any action aimed at preventing an employee from making a communication through the Ethical Channel shall be sanctioned in accordance with the applicable work and disciplinary regime.

The application process, evaluation or resolution of the communications received in the Ethical Channel shall be developed as quickly as possible, taking into account the characteristics of the reported facts and other existing circumstances.

## 7 Competent Body

The Regulatory Compliance Unit is responsible for Corporación Masaveu's Internal Information System, and so, shall be responsible for receiving, processing and operating the Ethical Channel.

The Regulatory Compliance Unit is the collegiate body that reports to the Board of Directors of Corporación Masaveu, S.A. with autonomous initiative and control powers within the scope of its competence in relation to the Group's Regulatory Compliance Model and the Internal Information System.

This body shall be chaired by Regulatory Compliance Management, and shall also include the Corporate, Industrial and Media General Management, as well as the person responsible for Internal Audit and the person who holds the position of Secretary of the Board of Directors, the latter acting as Secretary of the Unit.

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<sup>4</sup> Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption



The Regulatory Compliance Unit shall investigate all the information received through the established means regarding the possible commission of an unlawful or irregular act, provided that it considers that there is sufficient evidence of credibility.

The Regulatory Compliance Unit shall act under the principal of consensus, submitting its discrepancies to the adoption of resolutions by the majority of its members. In the event of a tied vote, the President of the RCU shall have the deciding vote.

The members of the Regulatory Compliance Unit may be replaced by other people from the company who perform similar functions if the following situations arise in relation to the person reporting or reported: related family or closeness or friendship, declared enmity with them or if they are affected persons. Those who form part of the Regulatory Compliance Unit, shall remain strictly impartial with respect to the affected parties, and so, in the event of any kind of relationship through blood or affinity with any of the person affected by the investigation, close friendship, expressed enmity with the persons affected by the procedure or who have direct or indirect interest in the specific process, must refrain from acting. In the event that, despite the existence of these causes, the abstentions do not occur, any of the persons affected by the procedure may request the removal of that person or people from the Regulatory Compliance Unit.

Those who, in accordance with this procedure, are responsible for the investigation and follow-up of complaints, undertake to maintain professional secrecy, impartiality and respect regarding all the cases they deal with for the purpose of the application of this procedure. The work carried out in this regard shall at all times guarantee the privacy and dignity of those involved.

If deemed appropriate, the Regulatory Compliance Unit may hire the services of specialised external agents for their collaboration in the investigation on the complaints reported through the Ethical Channel. The external agents must provide a report that shall remain in the custody of the Regulatory Compliance Unit on a confidential basis.

## 8 Content of the complaints

In order to be processed, the complaint must contain a minimum amount of information to enable the investigation of the reported facts to be initiated.

The following being the minimum requirements:

- (If not anonymous): Identification of the informant: Name, surnames and address, email address or safe place to receive notifications, with possibility to expressly waive the receipt of any notification of actions carried out by the Regulatory Compliance Unit regarding the information provided to this body.
- Reported irregularity: Description of the circumstances of the reported irregularity, providing answers to questions such as (i) what it consists of; (ii) when it happened; (iii) if there are any other people that can provide further information; (iv) area of business or company affected; (v) if there is an impact on customers; and (vi) estimation, if possible, of the economic damage caused.

- Provision of documents or proof, when possible, of the reported facts.
- Identification of those responsible for the irregularity, if known.

The person submitting the report shall provide all of the information in their possession regarding the matter in question and shall provide all of the information considered relevant or requested by those investigating the case.

The person submitting the report may file the complaint using the form included in Annex I to this procedure. For this purpose, this form is incorporated in the Ethical Channel Platform.

## 9 Receipt and processing of the complaints

### 9.1 Registration of the complaint

Once the complaint is presented, it shall be registered and assigned an identification code. The Internal Information System will be stored in a secure database with access restricted to the System manager. All of the complaints received shall be analysed independently by the Regulatory Compliance Unit, and the identity of the informant and the reported person shall be guaranteed total confidentiality.

Once the notification is received, receipt shall be acknowledged within a maximum of seven calendar days, unless the informant has expressly waived the receipt of notifications regarding the investigation and/or the identity of the informant has been ensured.

### 9.2 Admission procedure

Once the complaint has been registered, and after a preliminary analysis, the regulatory Compliance Unit, within a maximum period of ten working days from the registration date of the information, will adopt some of the following decisions:

- Reject the complaint, in some of the following cases:
  - When the facts or conduct reported are not within the scope of the Internal Information System.
  - When the facts reported lack verisimilitude or basis.
  - When the complaint does not contain sufficient information to prove the reported facts.
  - When the complaint does not have new and significant information on infringements in comparison with a previous one for which the corresponding procedures have been concluded, unless there are new factual or legal circumstances that justify a different follow-up.

Notwithstanding the foregoing, prior to the rejection of the complaint, the regulatory Compliance Unit may request the

informant to correct any defects in the complaint within a period of ten days.

The rejection of the complaint must be recorded in the system together with the reasoned decision of such conclusion which, must also be notified to the informant within five working days of its adoption, unless the notification is anonymous or the informant has waived the right to receive notifications in relation to the complaint filed.

- Admission of the complaint for processing. This decision shall be communicated to the informant within five working days of its adoption, unless the communication is anonymous or the informant has waived receipt of communications related to the complaint.
- Immediately forward the information to the Public Prosecutor's Office when the facts may constitute a crime or to the European Public Prosecutor's Office in the event that the facts affect the financial interests of the European Union.
- Forward the complaint to the unit within Corporación Masaveu Group that is responsible for its processing. Particularly those complaints received through the Ethical Channel and related to situations of mobbing and sexual harassment or harassment based on gender, sexual orientation, gender identity or expression, including those made in the digital domain, shall be processed, where appropriate, in accordance with the specific procedures that may exist for these specific matters in the company employing the complainant.

## 9.3 Communication with the informant

The Ethical Channel enables safe communication with the informant, even with those who have chosen to remain anonymous. For this purpose, a mailbox is set up where, with the unique code and password assigned to the registered complaint, the informant can learn about the status of the complaint, correct formal defects and provide new information. For safety protocols, the access codes and passwords shall not be retrievable, and so, if the informant does not remember them, they will have to generate a new complaint. This login information shall be disabled two months after the case has been closed.

Notwithstanding the foregoing, the Ethical Channel enables the informant to expressly waive the receipt of any notification regarding the measures taken by the Regulatory Compliance Unit as a consequence of the information.

## 9.4 Investigation of the complaints

The investigation shall include the process of collection, analysis and investigation of the facts reported, carried out in a rigorous, independent and objective manner, in order to determine the credibility of the complaint.

During the investigation process, the person affected by the information shall be guaranteed to be notified about the matter and the reported facts in a clear and concise manner. However, when this notification puts Corporación Masaveu Group's capacity to investigate or gather evidence in an efficient manner in peril, due to the risk of destruction or alteration of the evidence by the reported person, this may be delayed up to a maximum of three months from the receipt of the complaint. The affected persons shall under no circumstances be informed about the identity of the informant nor will they be allowed access to the complaint.

Without prejudice to the right to present written allegations, the investigation shall include, when possible, an interview with the affected person in which, always with utmost respect for the presumption of innocence, they will be invited to explain their version of the facts and to provide the evidence that they deem appropriate and relevant.

In order to guarantee the affected person's right to defence, the investigation shall provide that the affected person shall have access to the file without revealing any information that could identify the informant, and may be heard at any time, and shall be informed of the possibility of being assisted by legal counsel during the hearing.

During the processing of the procedure, the interested parties may submit allegations and provide documents or other evidence that will be taken into account in the investigation.

All Group employees must collaborate with the Regulatory Compliance Unit and shall be obliged to comply with any requests made to them to provide documentation, data or any information related to the procedure in question, including any personal data required.

## 9.5 Termination of proceedings

Once all of the proceedings have concluded, the Regulatory Compliance Unit shall adopt one of the following decisions:

- To shelf the file, which will be notified to the informant and, if applicable, to the affected person.
- In cases where, arising from the investigation, it is concluded that the conduct could constitute a crime, referral to the Public Prosecutor's Office or to the European Public Prosecutor's Office if the crime affects the interests of the European Union.
- Adoption of an agreement to initiate a sanctioning procedure.

The period for finalizing the proceedings and providing a response to the informant, if applicable, may not exceed three months from the receipt of the notification (following the dispatch of acknowledgement), except for particularly complicated cases that require an extended period of time, in which case, this could be extended up to a maximum of three additional months. Whatever the decision, the informant shall be notified, unless they have waived receipt of notifications or the complaint was anonymous.

## 9.6 Unfounded or false complaints

In the event that, after the investigation of the case, the complaint is deemed to have been made in bad faith or that the information provided or the evidence is false, the company may initiate disciplinary proceedings against those responsible.

## 10. Conservation

The data of the person making the report, as well as that of the employees or third parties included therein, shall be kept in the reporting system for the time required to decide on whether to initiate an investigation on the reported facts.

If it is proven that the information provided or part of it is not truthful, it shall be deleted as soon as such circumstance comes to light, unless such lack of truthfulness may constitute a criminal offence, in which case, the information shall be kept for the required time throughout the duration of the legal proceedings.

In any case, once three months have passed since the receipt of the communication without any investigation having been initiated, it must be deleted, unless the purpose of the conservation is to leave evidence of the performance of the system. The notifications that have not been followed up may only be recorded in anonymous form, without the implementation of the blocking obligation set out in article 32 of Organic Law 3/2018, of 5 December.

In the event of disciplinary measures, the decision will be kept in the employee's employment file for those periods of time required to assess repeated infringement according to the Collective Agreement, unless such information is required for determining any potential liabilities, in which case it will be blocked and only accessible for such purpose. Under no circumstances shall the data be kept for a period of over ten years.

## 11. Improvement measures

The information recorded through the Ethical Channel shall be analyzed and evaluated by the Regulatory Compliance Unit, within the limits defined in the previous section, for the purpose of improving the measures aimed at preventing and discovering the crimes or infringements that could be committed with the means or under the pretext of the companies that form part of Corporación Masaveu Group.

## 12. External Information Channels

Any person may inform the Independent Informant Protection Authority (A.A.I.) or the corresponding autonomous authorities, about the commission of any actions or omissions that may constitute infringements of European Law provided for in the Directive of the European Parliament and Council, of 23 October 2019, and serious or very serious criminal and administrative offences, including those involving economic losses for the Public Treasury and Social Security.

## 13. Distribution

The Regulatory Compliance Unit shall ensure awareness of this Policy and the existence of the Ethical Channel. To this effect, the policy and the respective Ethical Channel will be available on Corporación Masaveu's website, on the Intranet and the Group's Employee Portal.

## 14. Validity

This Policy shall come into effect upon approval by the Board of Directors of Corporación Masaveu.

## Annex I. Complaint form

|  |  |
|--|--|
| <b>Complainant's details:</b>                                |  |
| Name:  |  |
| Surnames:  |  |
| Contact details (email or contact tlf)                       |  |
| <b>Description of the reported incident:</b>                 |  |
| Describe the reported incident in a clear and concise manner |  |
|  |  |
|  |  |
|  |  |

|  |
|--|
|  |
| ¿Can others provide more information? If so, reveal their identity                                   |
|  |
| Indicate the activity in which it has been committed:  |
|  |
| Indicate if the reported incident has an impact customers or beneficiaries of activities or projects |
|  |

|   |
|---|
| <b>Identification of those responsible for the irregularity:</b>  |
| Can you identify any of the perpetrators of the reported incident? If they are known to you, identify them:   |
|   |
| <b>Proof:</b>   |
| Do you have any proof of the reported incident? If so, indicate what proof you have and attach the documents and evidence to this form:   |
|   |
| <p><b>Who processes your data?</b> Corporación Masaveu with registered address in C/ Cimadevilla nº8 33003 Oviedo is responsible for the management of the Internal Information System on behalf of the companies in the Masaveu Group.</p> <p><b>For what purpose?</b> To effectively manage the processing, investigation and, where appropriate, to resolve the complaints made through the Ethical Channel.</p> <p><b>What data is processed?</b> In accordance with the regulations in force it is possible to file an Anonymous complaint on Corporación Masaveu Group's Ethical Channel. However, if the informant wishes to do so, they can provide their identification details, such as name, surnames, and address, email or safe place to receive notifications. All information contained in the complaint will also be processed.</p> <p><b>Why can they do so?</b> Because it is necessary to comply with legal requirements, and also in public interest to prevent breaches of the regulations in force.</p> <p><b>To whom is your data communicated?</b><br/>The identity of the complainant will never be revealed to the affected person/s nor will they have access to the report.</p> |

**Who has access to your data?** Access to the personal data concerning the complainant and contained in the Ethical Channel is limited, within the scope of their powers and functions, exclusively to the members of the Regulatory Compliance Units those responsible for the Internal Information System, and to the data protection officer in the event that he/ she has been appointed by the Group Company to which the information refers.

**What rights do you have and where can you request them?** Access to your data by obtaining confirmation as to whether or not it is being processed; rectification of incomplete or inaccurate data, deletion of your data when it is no longer necessary, is required by law or you object to the processing, amongst other reasons, the opposition to the processing for reasons based on your personal circumstances, in which case these reasons will be analysed; the limitation of the treatment while it is being evaluated if the attention of other rights, you oppose to its suppression, or you want it to be kept for the exercise or defence of your claims; the information about the resolution, dismissal or filing of the complaint. You may request the exercise of these rights by writing to the Department of Attention to the rights of the interested parties to the Dpto. de Atención de derechos de los interesados en C/ Cimadevilla 8, 33003 Oviedo or send an email to [atencionderechos@grma.masaveu.com](mailto:atencionderechos@grma.masaveu.com)

You can also file a complaint with the Spanish Data Protection Agency (AEPD) if you consider that the processing of your data does not comply with law. You can go to the external information systems of the Independent Informant Protection Authority (A.A.I.), those created by the competent authorities of the autonomous communities and, where appropriate, to the competent institutions, bodies and agencies of the European Union.

**How long will your data be kept?** The data of the person making the report, and of the employees or third parties reflected therein, must be kept in the reporting system for the time necessary to decide whether to initiate an investigation into the reported facts.

In the event that a report does not meet the requirements for admission and processing, it will be removed from the Ethical Channel and conserved in an anonymous form, in order to leave evidence of the operation of Corporación Masaveu Group's crime prevention model.

If it were demonstrated that the information provided or part of it was not truthful, it shall be deleted immediately as soon as this circumstance comes to light, unless this untruthfulness may constitute a criminal offence, in which case the information shall be kept for the time required by the legal proceedings.

In any event, once the three months have passed since the receipt of the notification and no investigation proceedings have been initiated, it must be deleted, unless the purpose of the conservation is to leave evidence of the performance of the system.