

## Circuit whistle-blowing channel

The Whistle-blowing Channel is available 24 hours a day, 365 days per year, and maximum confidentiality is guaranteed.

### Accessing the Channel can be done by:

E-mail at the following address [comitecodigoetico@grupoortiz.com](mailto:comitecodigoetico@grupoortiz.com), which will be received by the Committee members.

A letter addressed to the Compliance Committee at the following postal address: Comité de Compliance (Compliance Committee), C/ Ensanche de Vallecas 44, 28051 Madrid, Spain.

Via the website: whistle-blowing channel: <http://www.grupoortiz.com>

### Minimum whistle-blowing requirements

1. Identity of whistle-blower, if any, and contact details.
2. A description of the suspicious event; as specific as possible.
3. Where applicable, documents or evidence supporting the reported claims.

### Reception and management of reported claims

The Compliance Committee, through the Head of the Internal Information System, is responsible for managing the complaint, which includes: reception, investigation, conclusion and filing.

### Complaint analysis

In order to prioritise those valid complaints that, due to their characteristics, have a greater impact, the Committee shall analyse the complaints in order to proceed with their investigation or archiving, conclusion and custody.

### Investigation, findings, action and closure

1. Initial contact with the whistle-blower to gather additional information: this will take place within 7 days
2. Development of the research

Opening of an investigation file and drafting of an investigation report with the conclusions and evidence found.

3. Imposition of sanctions and/or archiving

Once the Instructor's Report has been received, the Ethics Committee shall be responsible for:

- The imposition of appropriate sanctions depending on the seriousness of the conduct detected. - Informing the complainant of the measures taken.
- Notification of the file.

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