

## **ALEXANDRE HOTELS**

# POLICIES OF GENERAL PRINCIPLES REGARDING THE INTERNAL INFORMATION SYSTEM AND THE DEFENSE OF THE INFORMANT



#### 1. INTRODUCTION

The Policy on the General Principles of the Internal Information and Whistleblower Defence System (hereinafter, the Policy) seeks to establish a foundation of foundations aimed at promoting the correct use of the Internal Information System of this entity, as well as guaranteeing an integral defence of the informant.

#### 2. SCOPE

This policy applies in a generalized and comprehensive manner to this entity.

The principles of whistleblower protection and defence included in this policy will apply to whistleblowers in accordance with the provisions of Law 2/2023, of 20 February, regulating the protection of people who report regulatory breaches and the fight against corruption.

#### 3. PRINCIPLES OF THE POLICY

This Policy seeks to comply with the obligations contained in Law 2/2023, of 20 February, regulating the protection of persons who report regulatory breaches and the fight against corruption.

Based on the legal content imposed in the aforementioned Law, this entity is firmly committed to:

- Maintain a control mechanism that supports internal processes to improve and maintain the quality of the Internal Information System.
- Ensure that each and every one of the communications made through the Internal Information System will be attended.
- Develop and maintain transparent policies and procedures for all key data processed through the Internal Information System.
- Implement appropriate measures and introduce mechanisms to ensure the security of the information transmitted through the Internal Information System, as well as to reinforce and guarantee the protection and defense of the whistleblower.
- Provide advice, training, and support to personnel as necessary both in terms of the use and promotion of the use of the Internal Information System and the defense of the informant.
- Ensure that the policies for the use and use of the Internal Information System, as well as the promotion of whistleblower advocacy, will be committed and supported at all levels of the entity so that they can be coordinated and integrated with the rest of the strategic initiatives to form a completely coherent and effective framework.
- It will guarantee the non-disclosure of the data included in the communications carried out through the Internal Information System.
- It will restrict access to the data included in the communications carried out through the Internal Information System.
- Strictly comply with each and every one of the measures included in Law 2/2023, of 20 February, regulating the protection of people who report regulatory breaches and the fight against corruption.

### 4. POLICY CONTROL AND ENFORCEMENT

The entity's management bodies will ensure that the content of these Policies is correctly and adequately complied with.