

ALEXANDRE HOTELS

# INFORMATION MANAGEMENT PROCEDURE

## **1- OBJECT**

This document has been prepared with the purpose of establishing the Procedure for the Management of Information Received, corresponding to the Internal Information System or Complaint Channel of this entity.

This Management Procedure respects and complies in all cases with the minimum requirements established by Law 2/2023, of 20 February, regulating the protection of persons who report regulatory breaches and the fight against corruption.

## **2- SCOPE**

This procedure is applicable to all notifications received through the Internal Information System or Complaint Channel of this entity.

## **3- RESPONSIBILITIES**

3.1 - Of the administrative body/governing body of this entity/body

- Designate a person responsible (hereinafter "System Manager") for managing and processing the notifications received through the Internal Information System, as well as their dismissal or dismissal.
- Both the appointment and dismissal of the individually appointed natural person, as well as the members of the collegiate body, must be notified to the Independent Authority for the Protection of Whistleblowers, A.A.I., or, where appropriate, to the competent authorities or bodies of the Autonomous Communities, within the scope of their respective competences, within the following ten working days, specifying, in the event of their dismissal, the reasons that have justified it.
- Likewise, and exceptionally, it will appoint a substitute for the person in charge of the system in the event of the latter's absence.
- Establish guarantees for the protection of whistleblowers within the scope of the entity or body itself.
- Have a policy or strategy that enunciates the general principles in terms of internal information systems and whistleblower defense and that is duly publicized within the entity or body.
- To approve this procedure.
- Keep this procedure updated

3.2 - From the System Manager:

- To carry out their functions independently and autonomously with respect to the rest of the bodies of the entity or body, they may not receive instructions of any kind in their exercise, and must have all the personal and material means necessary to carry them out.
- The System Manager will be responsible for the diligent processing of notifications received through the Internal Information System or Whistleblowing Channel.
- Respect and ensure proper compliance with this procedure.

## **4- RIGHTS AND WARRANTIES OF THE PARTIES**

Any communication/complaint that is sent through the channels established in this procedure will enjoy total and absolute confidentiality.

In any case, this entity will prioritize and respect the right to presumption of innocence and honor of any of the parties involved in a communication/complaint, ensuring that the rights of any party involved are not violated.

Throughout the investigation of a communication/complaint, the right of the affected person to be informed of the actions or omissions attributed to him or her will be guaranteed. However, the exercise of this right will be limited in time until the appropriate time in order to ensure the successful completion of the investigation.

Respect for the provisions on the protection of personal data will be guaranteed in accordance with the provisions of Title V of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory breaches and the fight against corruption.

This entity will inform users of the system in a clear and accessible way about the external channels of information before the competent authorities and, where appropriate, before the institutions, bodies, offices or agencies of the European Union.

In particular, the complainant is informed that:

The complainant has at his/her disposal the following External Channels of information, and may make use of them in the same way as he/she makes use of this Internal Channel:

- External Information Channel of the Independent Authority for the Protection of Whistleblowers, A.A.I.: "In development"
- External Information Channel of the Autonomous Community: "Include access to the Complaints Channel of the Autonomous Community in particular"
- Canal Externo de Denuncia Derecho de la UE: [https://commission.europa.eu/about-european-commission/contact/problems-and-complaints/complaints-about-breaches-eu-law-member-states/how-make-complaint-eu-level\\_es](https://commission.europa.eu/about-european-commission/contact/problems-and-complaints/complaints-about-breaches-eu-law-member-states/how-make-complaint-eu-level_es)
- Information on protection EU law: [https://commission.europa.eu/aid-development-cooperation-fundamental-rights/your-rights-eu\\_en](https://commission.europa.eu/aid-development-cooperation-fundamental-rights/your-rights-eu_en)

## **5- INTERNAL INFORMATION CHANNEL/WHISTLEBLOWING CHANNEL**

This entity has adopted as an Internal Information Channel, called "Whistleblowing Channel", an online whistleblowing management system accessible from:

The website of the entity itself through the link:

<https://tucanalegal.canaldedenuncia.org/>

### 5.1 - Procedure for submitting complaints

The Whistleblowing Channel allows two ways for the subjects who wish to file complaints, hereinafter referred to as users:

1. Filing of Complaints by identifying the subjects who make the communications.
2. Making Anonymous Complaints.

#### *a. Sending a complaint by identifying the complainant.*

Users may make a communication/complaint by accessing through the link provided on the corporate website.

Access will require users to use "User" and "Password" login credentials. These access credentials can be provided to users in two ways:

- Communicated by the System Manager to Users individually, in the event that they have previously registered them through their access panel to the Complaints Channel
- Credentials received by the User in their email once they have registered from the web access panel of the Whistleblowing Channel.

#### *b. Sending an anonymous complaint.*

Once the User accesses the link provided on the entity's website, they may make a Complaint anonymously, by clicking on the "Anonymous Complaint" option.

The sending of the anonymous complaint will require filling in the field "Company Name (Company Name)" correctly and with the indications given in the USER COMPLAINTS CHANNEL USER MANUAL.

## 5.2 - Receipt of the complaint, acknowledgments of status to the complainant and exchange of information between the complainant and the System Manager

The System Manager may manage and receive each of the complaints made by accessing them through the Complaints section within the Complaints Management Web System, accessible through the link provided on the entity's website. In order to access this Panel, the System Manager will require an identification of his/her Username and Password, provided by the entity.

Within your complaints reception and management work area, you will be able to distinguish between complaints that are in process and those that have already been reviewed and managed.

Within the "In Process" section, the System Manager will have at his disposal all the complaints received to be managed, being able to differentiate whether they are complaints from Users identified with their name and surnames as well as those that are anonymous, the date of receipt or registration of each complaint, the days it has been open, as well as the status of the same.

The different States that may have complaints in Process are:

- Received: The complaint has arrived, but it has not been processed.
- In Progress: The working procedure on the complaint is in process.

Once a complaint has been received by the System Manager, the mandatory acknowledgement of receipt will be communicated to the complainant as soon as possible, and in any case within a maximum period of 7 calendar days from receipt, except in those cases in which this may jeopardize the confidentiality of the communication.

Once the System Manager communicates the acknowledgement of receipt to the complainant, they will receive a notice informing them that it has been received through the email provided in their user profile within the system.

In the case of a non-anonymous complaint, the complainant will be able to see the status of the processing of their complaint, from the "Anonymous Complaint Access" section and through the tracking code provided to anonymous Users at the time of submitting their complaints.

The stages of the proceedings in which a complaint can be found are:

- Received: The complaint has arrived, but it has not been processed.
- In Progress: The working procedure on the complaint is in process.
- Processed: The complaint has been successfully handled.

Any change in the status of the reports made by the System Manager will be notified to the whistleblower who has identified themselves when sending the reports through their email. All this provided that the User is allowed to notify changes in status acknowledgments via email.

As has been anticipated, the communication of the acknowledgement of receipt to the complainant by the System Manager, as well as the rest of the status changes that the Data Controller wishes to make with respect to each

complaint, will be carried out through the "Notifications" section, within the complaints management panel of the latter. The following status of the complaint may be communicated to the complainant:

- Report Received Complaint
- Notify complaint in process
- Notifies resolution of the complaint

The system will record the notifications made to the whistleblower, recording the date of sending, and will inform the System Manager if it has been received and read by the whistleblower through their access to the online system.

Likewise, the System Manager may modify the content of the message sent to the complainant when changing the status of each complaint.

### 5.3 - Treatment of the Complaint

The System Manager, once he has notified the complainant that the complaint is being processed, will begin with the investigation and development of the same.

The maximum period for responding to the investigative actions may not exceed three months from the receipt of the communication or, if no acknowledgement of receipt was sent to the informant, three months from the expiry of the period of seven days after the communication was 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 three additional months.

Through the system, you will have at your disposal the possibility of working on the complaint, as well as issuing a report and sending it to the entity's management bodies.

During the management of the complaint, the possibility of maintaining communication with the informant and, if deemed necessary, of requesting additional information from the informant is foreseen. This option can be carried out both externally and through the means enabled in the Complaint Channel itself through the "Chat" button available in each of the complaints received.

In any case, the information contained in the complaint, or that which may be obtained during its investigation, shall be brought to the attention of the Public Prosecutor's Office immediately when the facts could constitute an offence. In the event that the facts affect the financial interests of the European Union, it will be referred to the European Public Prosecutor's Office.

### 5.4 - Completion of the complaint

Once the study and investigation of the complaint has been completed, the System Manager will communicate the acknowledgement of status to the complainant through the option "Notify resolution of the complaint".

This notification of resolution of the complaint will in no case inform the complainant of the internal result of the investigation.

As soon as the complaint is finalized, it will be listed in the Reviewed Complaints section within the Complaints section, being from then on totally blocked and without the possibility of modifying it by any type of means.

#### 5.4 – Receipt of complaints by other means

When the communication/complaint is sent through complaint channels other than those established or is addressed to members of the staff not responsible for its processing, who have been trained in this matter and warned of the classification of its violation as a very serious infringement, the recipient of the communication must immediately forward it to the System Manager.

Notwithstanding the foregoing, this type of communication will enjoy the same confidentiality as if it were a complaint sent through the channels established in the entity.