

**ECOTIC ENTIDAD ADMINISTRADORA, SL**



**INFORMATION MANAGEMENT PROCEDURE THROUGH  
THE INTERNAL REPORTING CHANNEL**

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## 1) SUBMISSION OF INFORMATION OR REPORTS

The whistleblower, if opting to use ECOTIC ENTIDAD ADMINISTRADORA, SL's Internal Reporting Channel, may do so through a written communication. When completing the reporting form, they will have the option to submit the report anonymously or by providing personal details.

The form must be completed with at least all required fields to proceed with the report.

If the whistleblower identifies themselves, they may request an in-person meeting, which will take place within a maximum period of 7 days.

However, individuals making such reports should be aware that "knowingly reporting or publicly disclosing false information" is considered a very serious offense, and Law 2/23 imposes fines ranging from €30,001 to €300,000 for individuals committing such acts.

## 2) RECEIPT OF INFORMATION OR REPORT

Upon receipt of the report via our Channel, a registration number will be generated to identify the facts, possible internal investigations, and future resolutions, preserving the identity of both the whistleblower and those affected.

Reports will be recorded in the register book of information received by ECOTIC ENTIDAD ADMINISTRADORA, SL, which will also document any resulting internal investigations, always guaranteeing the legally established confidentiality requirements.

This register book is not public and may only be accessed, fully or partially, upon a reasoned request by the competent judicial authority, through a court order, and within the framework of a judicial procedure under its supervision.

ECOTIC ENTIDAD ADMINISTRADORA, SL also guarantees the protection of the identities of both the whistleblower and the individuals involved, as provided in Law 2/23. Whistleblowers are granted a series of rights, especially if the information provided complies with Articles 2 and 35 of said law, including the prohibition of retaliation (Article 36). Support and protection measures against retaliation outlined in Articles 37 and 38 are also of utmost importance to ECOTIC ENTIDAD ADMINISTRADORA, SL.

## 3) ACKNOWLEDGMENT OF RECEIPT

Within a maximum of 7 days, according to Article 9.2(c) of Law 2/23, an acknowledgment of receipt will be sent to identified whistleblowers.

Upon submitting the report, a tracking code and password will be provided to monitor the progress of the procedure.

In case the password is lost, a new one will not be issued for confidentiality reasons, and access to the system will be denied.

If the whistleblower remains anonymous, they will not receive updates but can track the status of their report and view comments or information requests by accessing the tracking option using the credentials provided after submission. From this section, the whistleblower may submit any additional information requested, maintaining the required safety and anonymity conditions.

If the informant or whistleblower chooses to remain anonymous, the reporting party will not be able to receive information about their progress. Instead, they will only be able to view their status and any comments and requests for information that the channel manager may have requested. They can access the follow-up option directly using their login details, which will be provided at the end of the report submission. From this section, the reporting party can provide any additional information requested, while maintaining the security and anonymity requirements required by law.

#### **4) INITIAL ANALYSIS OF THE REPORT**

Once the information has been received, an initial assessment will be carried out to determine whether the report should be admitted for processing, taking into account whether it is substantiated or if there are suspicions that it may involve criminal conduct and/or could cause harm requiring immediate actions to protect the whistleblower, third parties, or the organization itself.

If deemed necessary, additional information may be requested from the whistleblower.

In any case, ECOTIC ENTIDAD ADMINISTRADORA, SL will activate internal mechanisms to protect the whistleblower, safeguard their identity, and ensure respect for the presumption of innocence and the honor of the individuals involved.

ECOTIC ENTIDAD ADMINISTRADORA, SL informs that, in the event the reported conduct may constitute a criminal offense, it will be immediately referred to the Public Prosecutor's Office or to another Authority or Agency that may be competent to process the report. If the facts affect the financial interests of the European Union, the report will be forwarded to the European Public Prosecutor's Office. However, in the case of a non-anonymous report, it must be noted that the whistleblower's identity will be protected and may only be disclosed to the judicial authority, the Public Prosecutor, or the competent administrative authority in the context of a criminal, disciplinary, or sanctioning investigation.

#### **5) INVESTIGATION OF THE CASE**

Once the report has been admitted for processing, the individuals reported will be informed that they are under investigation due to the submission of a report through the Internal Reporting Channel.

During the investigation phase, evidence may be collected, all information will be analyzed, and interviews will be conducted with the reported person, the whistleblower, and any possible witnesses.

Internal investigations will be carried out to clarify the veracity of the reported facts. These investigations will involve the necessary investigative personnel depending on the complexity of the reported matters, and will be conducted with full guarantees of confidentiality, impartiality, and absence of conflicts of interest.

Depending on the type of infringement and available indications, a judicial or police investigation may also take place. The internal investigation will not interfere with such potential investigations.

The resolution adopted by the investigation team will be reasoned and justified. At all times, the protection of information and the custody of documents will be ensured.

The dismissal of the report will be agreed upon in the following cases:

- a) When the information refers to facts that do not concern actions or omissions within the material scope of application of this Regulation.
- b) When the information is provided by persons other than those detailed within the personal scope of application of this Regulation.
- c) When the reported facts do not constitute any infringement of the legal system, nor contravene the Code of Ethics, or any of the internal policies, rules, agreements, or procedures of ECOTIC ENTIDAD ADMINISTRADORA, SL.
- d) When the information is manifestly unfounded.
- e) When there are reasonable indications that the data on which the report is based has been obtained unlawfully.
- f) When the facts on which the report is based are absolutely implausible.
- g) Information based on reports previously dismissed through any internal reporting channel or that are merely a reproduction of a previous report that was already dismissed or duly investigated.
- h) Information concerning interpersonal conflicts.
- i) Information based merely on rumors and/or not based on specific or concrete suspicions or indications.
- j) Information concerning public facts (publicly available information).
- k) Information about facts or conduct that are already under police or judicial investigation.

The dismissal will be notified to the whistleblower within seven calendar days, unless the report is anonymous or the whistleblower has waived the right to receive communications. In any case,

a record of the dismissal will be kept in the complaints logbook of ECOTIC ENTIDAD ADMINISTRADORA, SL.

Conversely, if the investigation team decides that the report should be processed, this will also be recorded accordingly. The admission of the report will be notified to the whistleblower through the mechanisms mentioned in section 10.3 of this Regulation.

## 6) RESOLUTION OF THE CASE

Once the investigation is concluded, the case will be resolved, and the outcome may be:

- That a violation has been detected, in which case the following actions will be taken:
  - The necessary, proportionate, and sufficient measures will be adopted to resolve the potential conflict and to monitor that it does not recur, in accordance with the policies, Code of Ethics, internal rules, agreements, or procedures of ECOTIC ENTIDAD ADMINISTRADORA, SL. If applicable, internal sanctions in line with these reference rules may be imposed.
  - Where appropriate, disciplinary measures may be adopted.
  - Communication of the facts to the relevant Authorities.
  - Where applicable, monitoring of the outcomes of judicial/police investigations.
- That no violation has been detected, in which case the following will apply:
  - The investigators will justify their decision.
  - ECOTIC ENTIDAD ADMINISTRADORA, SL will in any case protect the information and ensure the custody of the documents received.

The investigation must be completed within 3 months from the date of its acceptance. This period may be extended by an additional 3 months in duly justified cases.

## 7) CONTENT OF THE FINAL REPORT

In all cases, the decision must include the following points:

- a) Identification code of the report and the date it was received;
- b) Description of the reported facts;
- c) Investigative actions carried out to clarify the facts, assessment of the evidence gathered, and of the indications obtained;
- d) Conclusions of the investigation;
- e) Where applicable, measures to be adopted.

When the report has led to the opening of an administrative case or judicial proceeding, ECOTIC ENTIDAD ADMINISTRADORA, SL also undertakes to monitor the outcomes of the administrative, judicial, or police investigations.

## 8) ARCHIVING AND DATA DELETION

After three months have passed since the receipt of the report without any investigative actions having been initiated, ECOTIC ENTIDAD ADMINISTRADORA, SL will proceed to delete the

personal data related to the report, unless the purpose of retaining such data is to provide evidence of the functioning of the system. Reports that have not been processed may only be recorded in anonymized form.

The personal data contained in the information received and in internal investigations will only be retained for the time necessary and proportionate to comply with Law 2/2023.

If it is found that the information received, or part of it, is not truthful, it will be immediately deleted, unless the falsehood may constitute a criminal offense, in which case it will be retained for the time necessary for the judicial process.

Any information containing special category personal data will be deleted immediately, and will not be registered or processed.

In any case, ECOTIC ENTIDAD ADMINISTRADORA, SL will proceed to archive the file generated by the report in the following situations:

- 1) No measures needed to be taken;
- 2) The facts do not give rise to an investigation;
- 3) The matter must be referred to another procedure (judicial, police, etc.);
- 4) The investigation has concluded (whether or not a violation was detected).

The documentation of the investigations carried out may include, among other things: findings, measures adopted, lessons learned, etc.

## **9) DOCUMENTATION IN THE REGISTER BOOK**

ECOTIC ENTIDAD ADMINISTRADORA, SL undertakes to document in the complaints logbook the information received and the internal investigations carried out as a result, always ensuring compliance with the confidentiality requirements legally established under Law 2/2023.

This documentation shall include:

- a) The date of conclusion of the case;
- b) The person who approves the conclusion;
- c) The measures that have been adopted;
- d) The relevant evidence.