#### Whistleblowing channel

Do you have reliable information on any serious or very serious crime or infringement committed in any of our group's hotels or companies?

**OLA Hotels** offers you various channels to report the facts, guaranteeing you complete confidentiality and absolute protection against any type of reprisal.

# Who can report cases?

Any person who maintains or has maintained any type of link with **OLA HOTELS**.

The following can thus report such cases: employees of any of our companies, selfemployed workers, professional associates, partners, executives, subsidiaries of our contractors or suppliers, former employees, former partners, former directors or authorised signatories, interns, applicants for training or selection processes.

## How can I submit a complaint?

By post, sending a letter to the attention of the «Head of the **OLA HOTELS** Internal Information System» Gran Vía Asima, 4, 5ª, 07009 Palma de Mallorca.

By sending an e-mail to <a href="mailto:personal@olahotels.com">personal@olahotels.com</a>

## Do I have to give my personal details?

Although it is advisable for you to provide your name, address, ID number and a contact phone number or e-mail address, so that we can verify the facts and request additional information or keep you up to date on the course of investigations, you have the right to submit your report anonymously. We will also investigate it.

#### What facts can be reported?

Our whistleblowing channel is NOT a place to make complaints. If you do this, the case will be closed.

This is a RESTRICTED CHANNEL, designed to report particularly serious events that may constitute a serious or very serious crime or administrative offence, when the informant is convinced that they really occurred.

The events must also have taken place in the workplace or in connection with our professional activity. Events not related to us must be reported to the relevant police, administrative or judicial authorities.

If the complainant is aware that their information is unlikely to be true or is manifestly false, or if the reason for the complaint is to slander the person or organisation being reported, they will not be entitled to any protection and **OLA Hotels** may lodge a formal complaint and hold them legally liable.

### **How will complaints be processed?**

**OLA Hotels** has designated an "Internal Information System Manager". This is the only person who will have access to the complaint and who will be responsible for investigating it.

The investigation will be carried out with the utmost discretion and will be totally confidential. The defendant and any other persons affected by the complaint will not have access to the complainant's identity.

If the complainant has provided an address, telephone number or e-mail for communications, they will be informed of the admission or rejection of their complaint and of the decision taken at the end of the investigation. If the investigation should reveal that a crime has been committed, the facts must be reported to the Public Prosecutor's Office or the judicial authorities. If a serious or very serious administrative offence has been committed, the relevant authorities will be informed.

Regardless of whether complainants use our internal information channels, they may use the external channels provided by the judicial administration system or the relevant administrative authorities, in addition to said channels or as an alternative.

### What protection will the complainant have?

All persons who use our internal channels of complaint in good faith will have the right to be protected, provided that the events reported are not manifestly false or unlikely to be true.

The protection of complainants will in all cases include the right not to have their identity disclosed to those who have been reported or to others affected by the complaint.

**OLA Hotels** guarantees that no whistleblower will be subject to retaliation for reports submitted or complaints made through our internal channels or, if applicable, those submitted to the Independent Authority for the Protection of the Informant or those publicly disclosed under the terms of Act 2/2023. The right of protection will extend to their relatives and close associates, and to any organisations with which the complainant maintains links.

Data processing carried out in accordance with Act 2/2023 is protected by the Act, which constitutes its legal justification. In addition, the regulations establish a presumption of legality for the processing of special categories of data on the basis of essential public interest.

In compliance with data protection legislation, all data subjects are also informed that their identity will remain confidential and will not be disclosed to the persons to whom the events reported refer or to third parties, except when there is a legal obligation to do so.

The complainant and any interested party may exercise their right to access, rectify, limit, delete and transfer their personal data in accordance with current legislation. In view of the requirement for confidentiality mentioned in the previous paragraph, some of these rights may be subject to certain limitations, for example, with regard to the right of access or the right of opposition.

Only those company employees specifically authorised to do so will be able to access the data contained in the Internal Information System. Disclosure of such data to third parties will also be limited in accordance with the law.

The data may only be kept for as long as is necessary to decide whether it is appropriate to initiate an investigation. Moreover, if three months have passed after the submission of the report and no investigation has been initiated, the personal data will be deleted, unless the purpose of storing them is to provide evidence of the functioning of the Internal Information System, in which case the data will be anonymised.