

Ethical Channel Policy

Catalonia Hotels & Resorts has made an internal reporting channel available to all of its members of staff and its Stakeholders. It allows them to submit questions about the Code of Ethics and other internal rules quickly and in confidentiality. It also enables them to report potential breaches and violations of the regulations in force that constitute an offence against the legal system.

This Ethical Channel is an essential element for the smooth running of the Company, as well as for contributing to the ongoing improvement of **Catalonia Hotels & Resorts**. By reporting potential breaches of the Code of Ethics and other internal rules, everybody plays a part in protecting individual rights and those of **Catalonia Hotels & Resorts**.

Under no circumstances will conduct deemed to be a reprisal be tolerated, including threats of and attempt at reprisals against anybody who uses the Ethical Channel in good faith. Anyone who reports an incident or irregularity through the Ethical Channel will be entitled to protection, provided that a report is covered by the material scope of application of Act 2/2023, of 20 February, which governs the protection of people who report regulatory breaches and the fight against corruption, and that has been submitted in accordance with the requirements provided for in this Act.

The Ethical Channel has been designed in such a way that confidentiality is safeguarded at all times, not only of the person who reports a breach, but also of the events that were the subject matter of a report and of the third parties mentioned in it, as well as of the internal investigation procedure. Therefore, with a view to improving how investigations are conducted **Catalonia Hotels & Resorts** encourages people who submit a report to identify themselves, but anonymous reports will also be accepted and investigated.

The Ethical Channel is handled by the Department of Internal Audit, Risks and Compliance, who will at all times safeguard its total independence and objectivity in handling and processing reports received.

Furthermore, it should be highlighted that the presumption of innocence and the right to reputation will be ensured of anyone affected by a report of a breach.

Reports may be submitted to the Ethical Channel by email at canal.etico@cataloniahotels.com or by letter to the following address: Córcega, 323 – 08037 Barcelona, for the attention of Dirección de Auditoría Interna, Riesgos y Cumplimiento.

Notwithstanding the fact that **Catalonia Hotels & Resorts** has an Ethical Channel, its employees and Stakeholders are hereby informed that they may report events to external channels managed by public bodies and organisations, such as the Autoridad Independiente de Protección del Informante (Independent Authority for the Protection of Informants).

Personal data processing

Catalonia Hotels & Resorts shall process your personal data pursuant to Organic Law 3/2018, of 5 December, on Personal Data Protection and the safeguard of digital rights, and to Regulation (EU) 2016/679 of the European Parliament and Council, of 27 April 2016, so that you are able to request information about the Code of Ethics and other internal rules, and/or report possible breaches, incidents and irregularities through the Ethical Channel.

You may withdraw your consent at any time, as well as exercise your rights related to personal data protection by sending an email to lopd@cataloniahotels.com or a letter to the following address: Córcega, 323 – 08037 Barcelona, Auditoría Interna, Riesgos y Cumplimiento, in which case the wording “Protección de Datos – Canal Ético” should be added on the envelope.

You are likewise informed that you may file a claim with the Spanish Data Protection Agency for any matters related to the enforcement of this Policy.

SCHEDULE I – Contact form

CONTACT FORM

Contact details

Full name:			
Email:		Telephone number:	

Report details

Date and time:	
Hotel/Department:	
Country:	
Category:	
Description of the events:	
Persons and/or departments involved:	
Evidence – attach file	