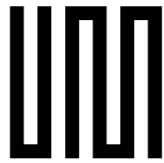


# **WHISTLEBLOWER CHANNEL POLICY**



**UMUSIC HOTELS®**

## INTRODUCTION

UMusic Hotels is strongly committed to ethical conduct, as well as to respecting and complying with national and European regulations. Therefore, it aims to share this commitment with its employees, business partners, and stakeholders by implementing, among other measures, a Compliance Channel. This channel is intended to be the preferred means of communication—secure, efficient, clear, and accessible—ensuring confidentiality and allowing for anonymous reporting. Its general principles are outlined in this Policy.

## PURPOSE

The Whistleblowing Channel Policy, approved by the Management Body, aims to disseminate the essential principles that govern the operation of the Whistleblowing Channel, particularly regarding the management, investigation, and response to reports in accordance with applicable legislation.

The members of UMusic Hotels have the duty to promptly and in good faith report any breach or violation they suspect or become aware of during their professional relationship.

These reports should preferably be made through the UMusic Hotels Whistleblowing Channel. In any case, the external channel managed by the competent authority is also available to them.

Independently of the Independent Authority for Whistleblower Protection (A.A.I.) or the regional bodies and authorities provided for in Law 2/2023, of February 20, regulating the protection of people who report regulatory infringements and the fight against corruption. Reports may also be made to the police or national or European judicial authorities.

Alongside this duty to report, the members of UMusic Hotels must proactively and in good faith cooperate with any investigations that may be initiated.

UMusic Hotels expects and encourages its stakeholders and business partners to embrace and share this duty of reporting and cooperation, so that the Organization can identify and respond appropriately and effectively to any potential irregularities or breaches.

## **AREAS**

### **SUBJECTIVE SCOPE**

#### **WHO CAN REPORT?**

Employees:

- Employees or former employees of UMusic Hotels.
- Members of the administrative and management body
- Non-executive members.

Stakeholders and business partners

- Shareholders, participants and investors.
- Contractors, subcontractors and suppliers.
- Self-employed people.
- Persons who have initiated the contracting process or negotiations.

### **SUBJECTIVE SCOPE**

#### **WHAT CAN I REPORT?**

Any action or omission detected within the scope of the labor or professional relationship with UMusic Hotels that may imply:

- A regulatory violation.
- A crime.
- A serious administrative infraction.

## PRINCIPLES AND COMMITMENTS

### WHISTLEBLOWER CHANNEL POLICY

UMusic Hotels has implemented an Internal Reporting System or Complaints Channel that guarantees the rights of the informant in good faith and the proper management of the communications received in accordance with the legislation in force.

The Whistleblowing Channel is a confidential, independent, and objective means for handling communications.

UMusic Hotels has appointed the Whistleblowing Channel Committee as the body responsible for managing the Information System or Whistleblowing Channel. This committee is composed of the People & Culture Director, the People & Culture Coordinator, the Duty Manager, and the General Manager.

If a report is filed against any member of the Committee, or if there is a conflict of interest involving one of them, that individual shall recuse themselves and will not take part in the assessment or handling of the report, nor in any investigation procedure that may be carried out. The report will instead be referred to the remaining unaffected member or members of the Committee for processing.

Employees of UMusic Hotels have the duty to report in good faith any violations or potential breaches they become aware of within the scope of their employment or professional relationship, so that the Organization can identify and respond appropriately and effectively to possible irregularities. They must also cooperate in any investigations carried out. Serious non-compliance with these obligations may result in disciplinary sanctions.

Communications may be made through the various channels enabled within the UMusic Hotels Whistleblowing Channel, including anonymously.

Preferably, communications should be made in writing or by recording a voice message through the UMusic Hotels Whistleblowing Platform:

<https://www.umusic-hotels.com/es/footer-links/policies/bienvenid-al-canal-de-denuncias-de-umusic-hotels>.

This platform is a confidential and secure line that can be used to submit reports, including anonymously. It is available 24 hours a day, every day of the year, and is run by an external provider that uses data encryption, ensuring the integrity and confidentiality of the information.

Although communications will always be processed through the aforementioned platform for reasons of confidentiality and security, it will be permitted to submit reports in person, by prior request, to the Whistleblowing Channel Committee.

In this case, the Committee members receiving the communication will record the opening of an investigation or inquiry at the time of the report, which shall be recorded if consent is given or, otherwise, transcribed.

## **GUARANTEES AND PROCEDURES**

### **WHISTLEBLOWER CHANNEL POLICY**

The Whistleblowing Channel Committee, composed of the People & Culture Director, People & Culture Coordinator, Duty Manager, and General Manager, is responsible for managing the Channel and diligently processing the reports.

UMusic Hotels ensures proper and appropriate management of the communications received in accordance with applicable regulations.

Once a report is submitted, the informant will receive an acknowledgment of receipt from the Whistleblowing Channel Committee within a maximum period of 7 calendar days from its receipt, unless doing so could jeopardize the confidentiality of the communication.

Upon receipt of the report, and if it is accepted for processing, the Whistleblowing Channel Committee will appoint the Investigative Committee.

Investigations will be conducted in accordance with the provisions set forth in the UMusic Hotels Whistleblowing Channel Management Procedure.

The Investigative Committee of the Whistleblowing Channel will develop an investigation plan and may, during the course of the inquiry, rely on specialized units and external third parties, always ensuring the confidentiality of the informant, any person involved in the investigation, and those affected, except in cases of consent for disclosure or communication, or judicial or administrative requirement.

The Whistleblowing Channel Committee will ensure that all actions deemed appropriate are taken to determine the existence or non-existence of the alleged reported breach, as well as to obtain the necessary evidence to have sufficient proof of the commission of the infringement, if applicable, always adhering to the principles of necessity, suitability, and proportionality.

During the course of the investigation, precautionary measures may be taken as deemed appropriate to protect the interests of individuals, the investigation process, or UMusic Hotels.

The investigation will be concluded within a maximum period of 3 months from receipt of the report. In cases of special complexity, the investigation period may be extended by an additional 3 months.

During the investigation, the investigative body may communicate with the informant to, if necessary, obtain additional information, unless the informant expressly waives this right.

UMusic Hotels will take appropriate and necessary measures to ensure the absence of conflicts of interest, as well as the independence, transparency, and confidentiality of the matter.

## GUARANTEES AND PROCEDURES

### Rights of the complainant:

UMusic Hotels guarantee full protection and the necessary support measures for any person who, in good faith, reports a breach. This protection includes:

- Protection against any retaliation, attempted retaliation, or threat.
- Confidentiality of personal data and reported facts, except when express authorization for disclosure is given or when required by authorities.
- Right to honor.
- Right to be informed about the status of the investigation and its conclusions.
- Right to protection and confidentiality of their identity, except when required by judicial or administrative authorities.

However, the filing of reports made in bad faith may be subject to disciplinary sanctions, in accordance with the provisions of the Whistleblowing Channel Management Procedure.

### Rights of the reported person:

- Right to be informed of the actions or omissions attributed to them. This information will be provided at the appropriate time and in the manner determined by the investigative body.
- Right to limited access to the case file.
- Right to honor.
- Right to the presumption of innocence.
- Right to defense: the right to be heard, to make allegations, and to present exculpatory evidence.
- Right to be informed about the status of the investigation and its conclusions.

UMusic Hotels will maintain an appropriate, adequate, and up-to-date record of all communications received in accordance with applicable legislation.

Once the investigation is concluded and the outcome determined, UMusic Hotels will act in accordance with its internal procedures and applicable laws.



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