



COMPLAINTS CHANNEL USER GUIDE

LAW 2 / 2023 ON COMPLAINANT PROTECTION



MATERIAL SCOPE

WHAT MAY BE REPORTED?

- 1.-Breaches of European Union law. Annexed to Directive (EU) 2019/1937.
- 2.-Serious or very serious administrative infringements.
- 3.-Criminal offences.

Examples of such behaviour include:

- Fraud and scams.
- Irregularities with the Social Security or the Tax Authorities.
- Embezzlement.
- Money laundering.
- Situations of discrimination or sexual abuse.
- Conduct and behaviour possibly considered illegal within the workspace.
- Alleged profitable mismanagement of company resources.

PERSONAL SCOPE

WHO CAN FILE A COMPLAINT?

Any person who belongs to the company and external individuals who are or have been associated or related to the company in an occupational or professional context.

This includes individuals who participate in recruitment processes or who have a relationship through scholarships, volunteering or training, or who are self-employed or freelance.

Including shareholders or members of the administration, management, or supervisory body of an organization, as well as non- executive members. Legal entities for which the reporting person is employed by, or has an employment relationship, are within the personal jurisdiction of the law.

HOW TO DO IT?

MEANS TO WHICH INFORMATION CAN BE SUBMITTED

The informant may contact:

EXTERNAL SYSTEM

There is an external channel managed by the Independent Authority for the Protection of Informants (A.A.I). This channel is complementary to the internal channel, and is endowed with the guarantees of independence and autonomy required by the European Union.

The external channel can be used either directly or after the internal channel has been utilized. It allows for anonymous communication.

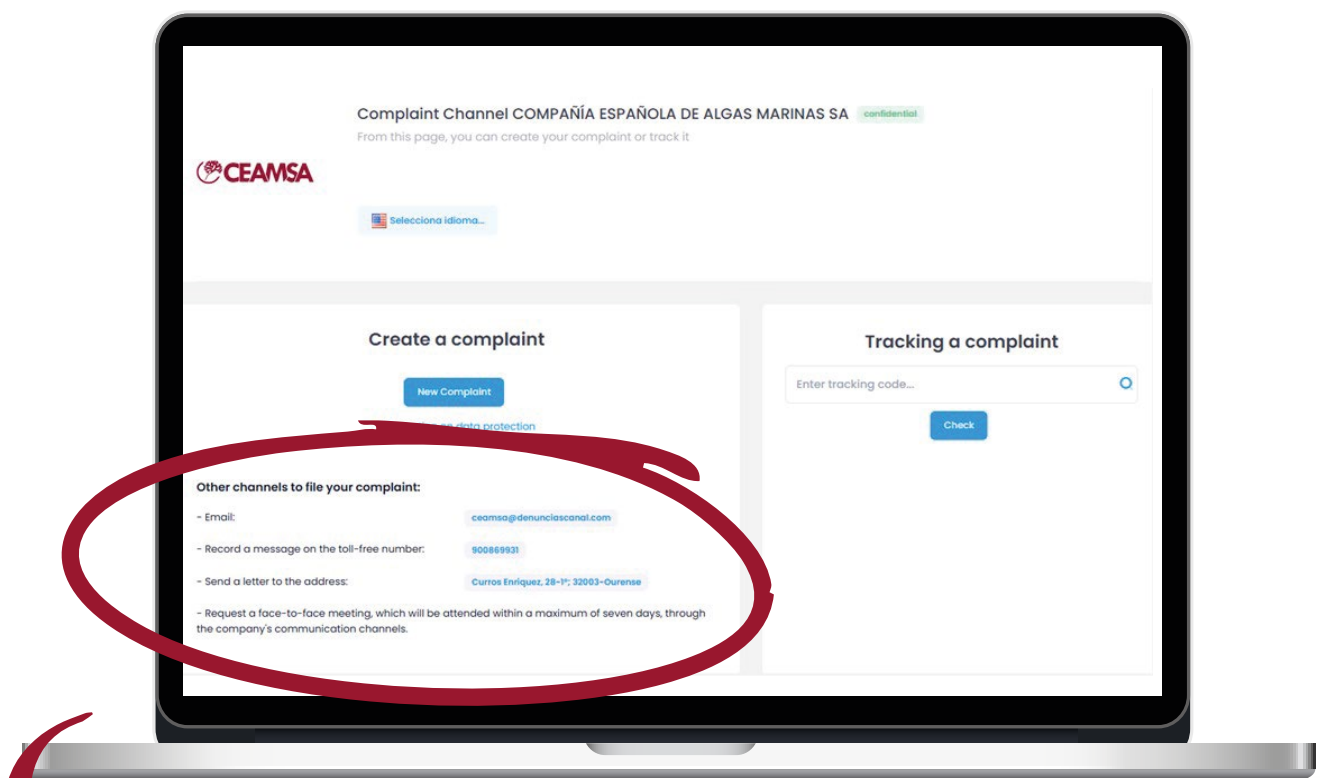
The timeframe for conducting investigations and providing a response may not exceed three months.

INTERNAL SYSTEM

ESCRITOS	VERBALES
Ethical line mail: ceamsa@denunciascanal.com	Toll free number: 900 869 931
Form available on the web site	Meeting in person within 7 days
Postal letter to: C/Curros Enríquez, nº28, 1º, 32003 - Ourense	

HOW TO USE THE COMPLAINTS INTERFACE?

This is the channel page interface. From here you can generate the report or submit the information. In addition, the details for other means of communication are provided:

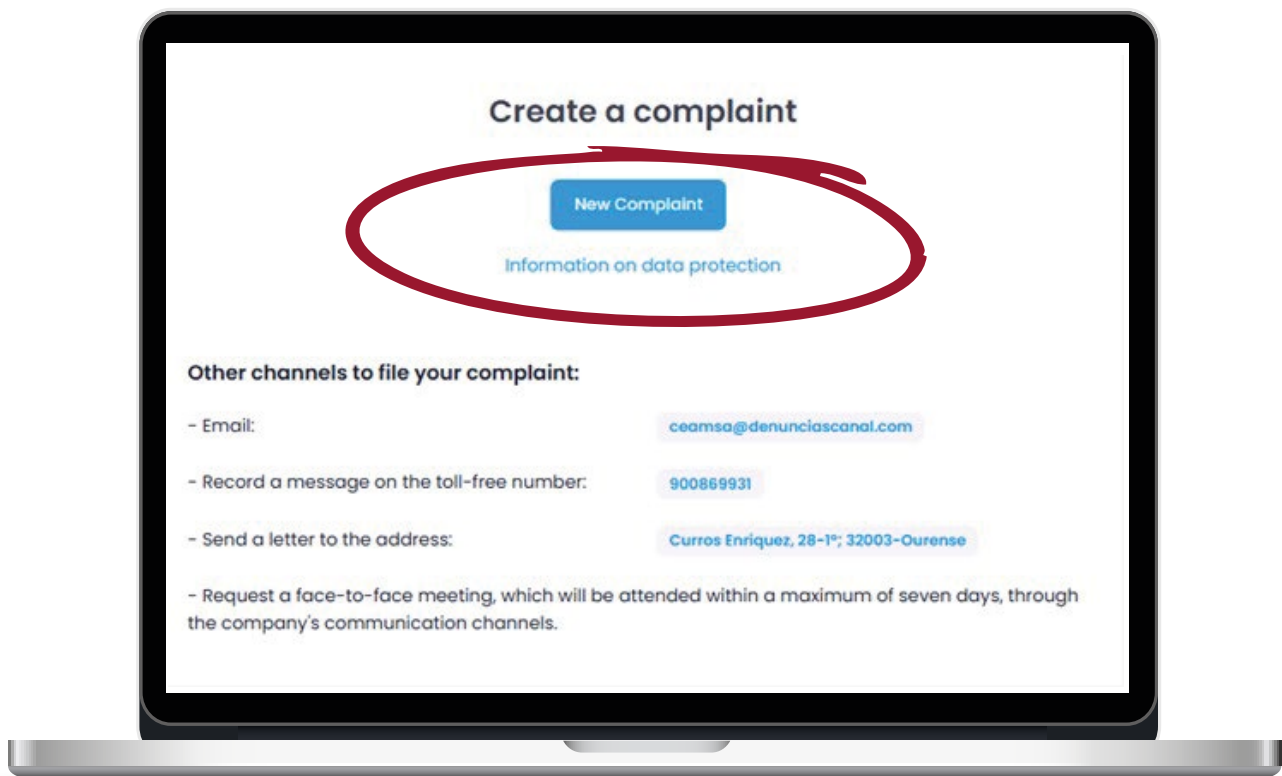


Other channels to file your complaint:

- Email: ceamsa@denunciascanal.com
- Record a message on the toll-free number: [900869931](tel:900869931)
- Send a letter to the address: [Curros Enriquez, 28-1º; 32003-Ourense](https://www.google.com/maps/place/Curros+Enriquez,+28-1%C3%B0,+32003-Ourense)

HOW IS THE COMPLAINT FILED?

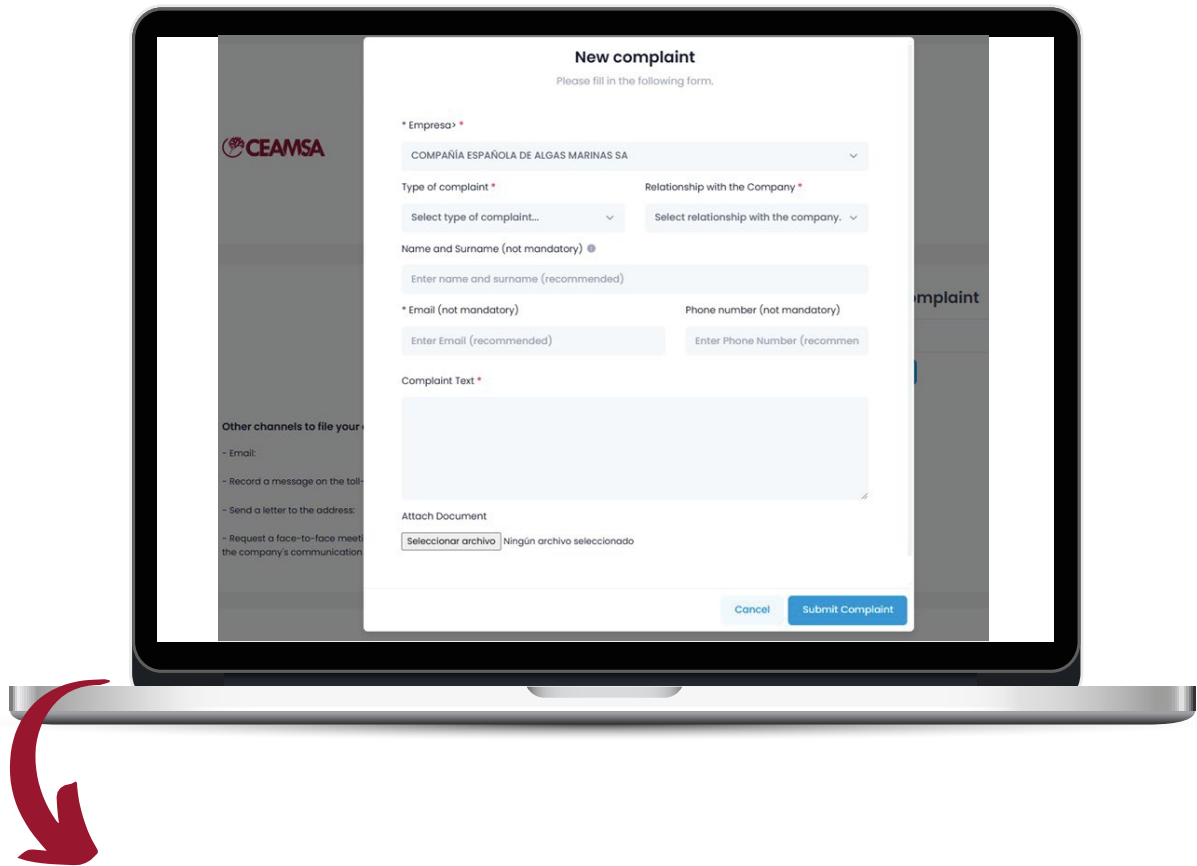
To file a complaint through the channel, click on the complaints button. Directly below the button you will see information on data protection.



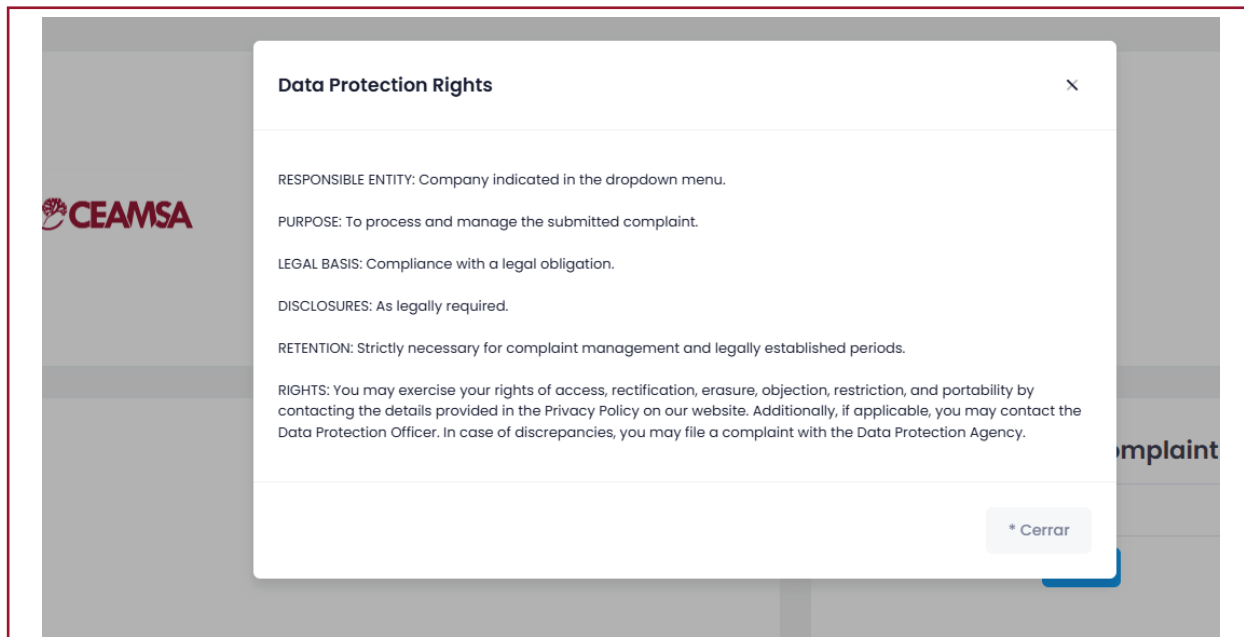
Confidentiality and respect for data protection regulations are guaranteed throughout the process.

Once the new complaint button has been clicked, a form is opened to file a new complaint.

Please note that anonymous reporting is allowed, so identification and contact details are not mandatory. If accidentally obtained, they shall be disposed of without undue delay. If personal data is provided voluntarily, it is guaranteed that your identity will be kept confidential and will not be communicated to the person (or persons) to whom the facts relate or to third parties.



Information on data protection is provided at the bottom.



Data Protection Rights

RESPONSIBLE ENTITY: Company indicated in the dropdown menu.

PURPOSE: To process and manage the submitted complaint.

LEGAL BASIS: Compliance with a legal obligation.

DISCLOSURES: As legally required.

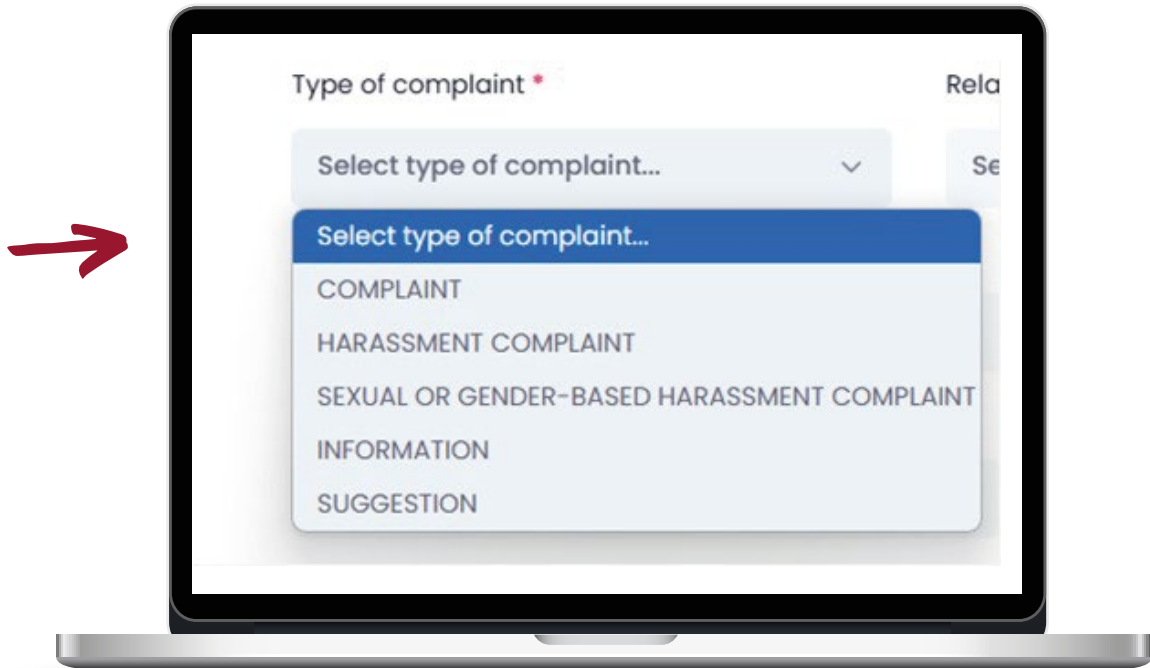
RETENTION: Strictly necessary for complaint management and legally established periods.

RIGHTS: You may exercise your rights of access, rectification, erasure, objection, restriction, and portability by contacting the details provided in the Privacy Policy on our website. Additionally, if applicable, you may contact the Data Protection Officer. In case of discrepancies, you may file a complaint with the Data Protection Agency.

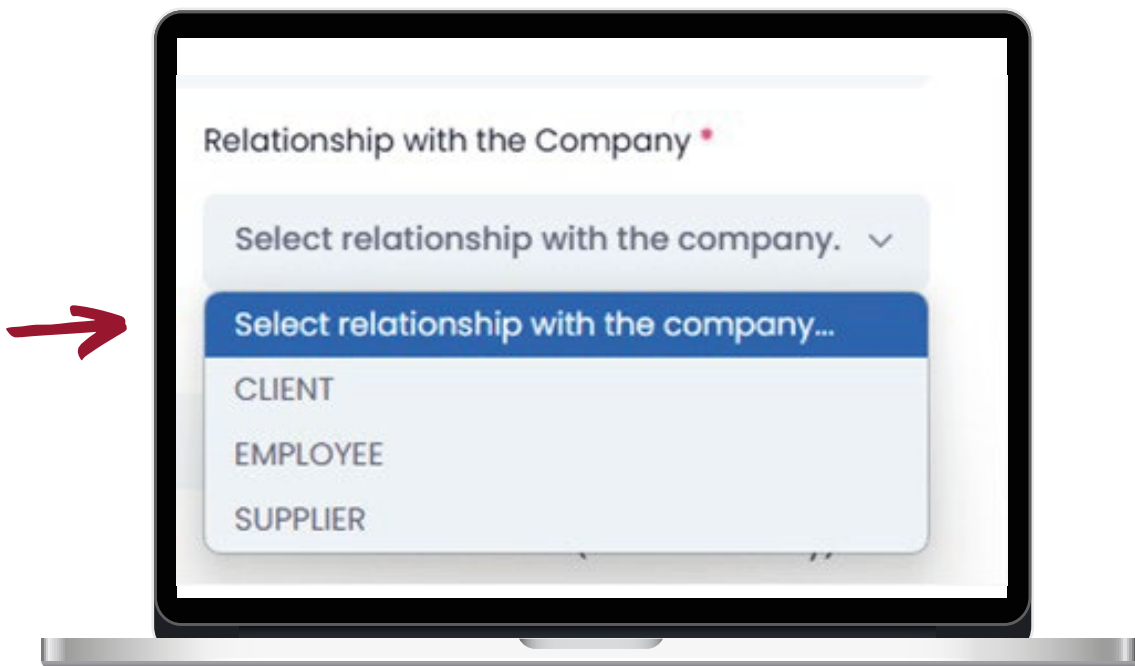
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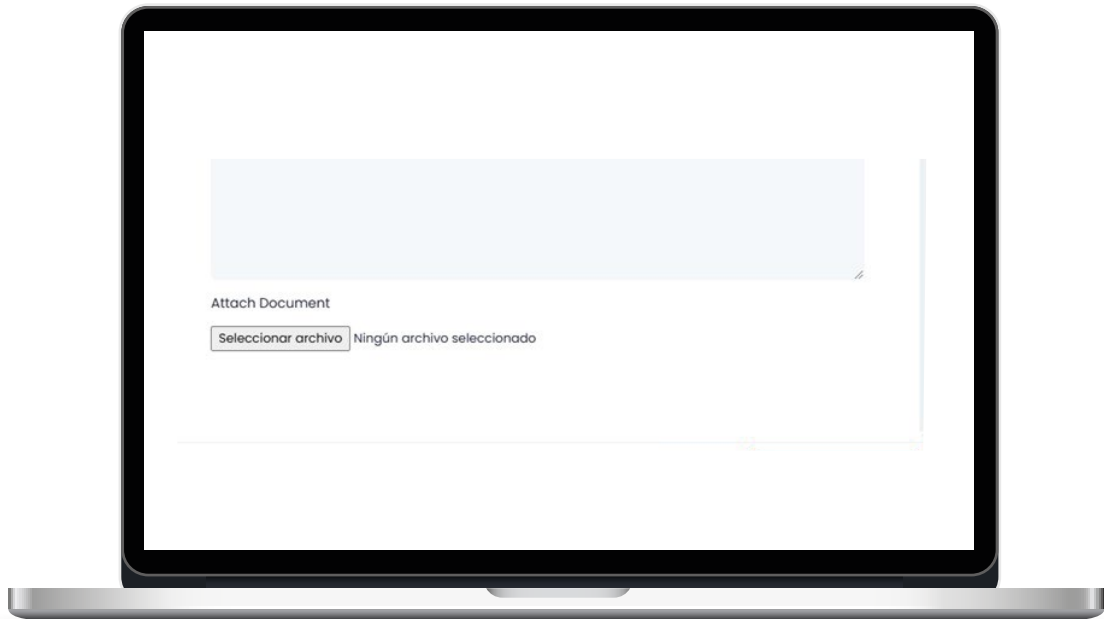
HOW DO I FILE A COMPLAINT? THE COMPLAINT'S FORM

There is a drop-down menu to select the type of complaint:



And another drop-down to indicate the relationship or link to the company:

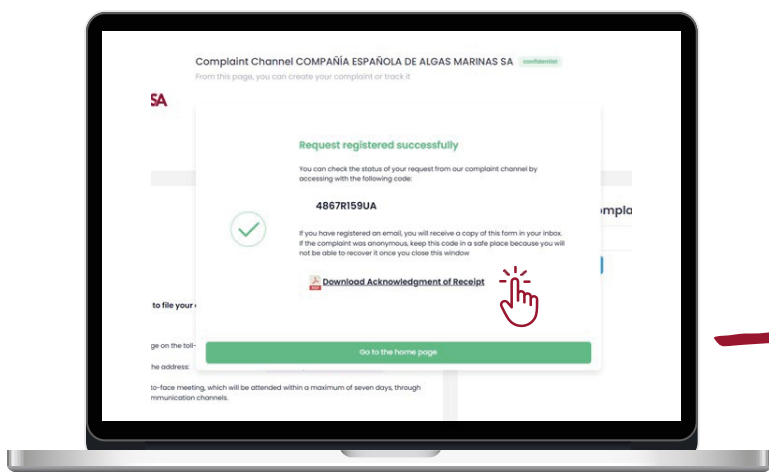





From the moment the complaint is filed, the maximum period for investigation and resolution is 3 months.

ACKNOWLEDGEMENT OF RECEIPT

All complaints filed through the channel automatically receive an acknowledgement of receipt with a tracking number so that the status of the complaint can be consulted. The acknowledgement can be downloaded as a PDF file by clicking on the link.



Canal de Denuncias EMPRESA 

Acuse de recibo Canal de Denuncias. Tipo: INFORMACIÓN
Fecha/hora creación: 21/11/2023 09:03:19

Empresa:

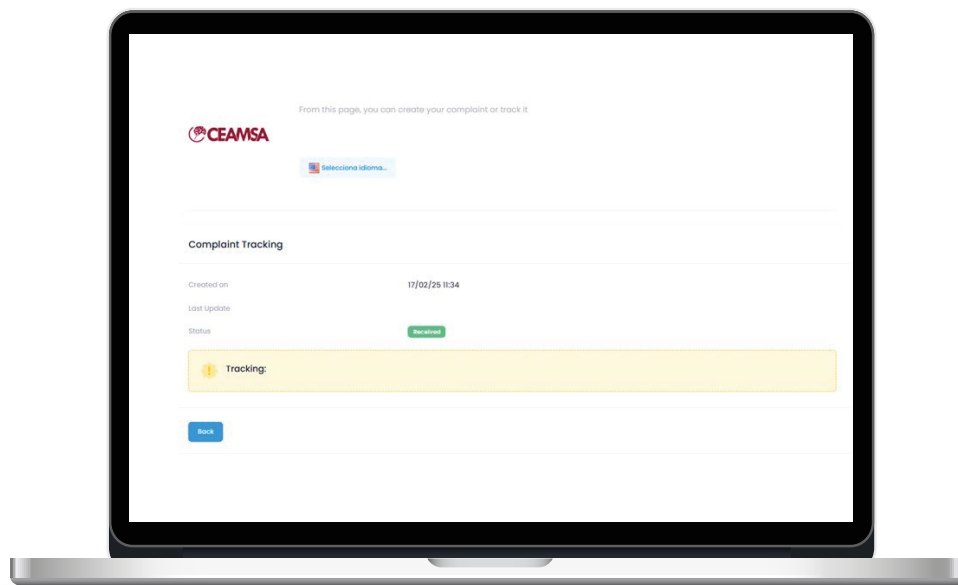
Código de seguimiento: 3J5M6UTU7I
Tipo: INFORMACIÓN
Estado: Recibida
Nombre: MARÍA ALONSO
Email: xxx@gmail.com
Teléfono: --
Relación con la empresa: CLIENTE

Texto Denuncia
esto es una prueba

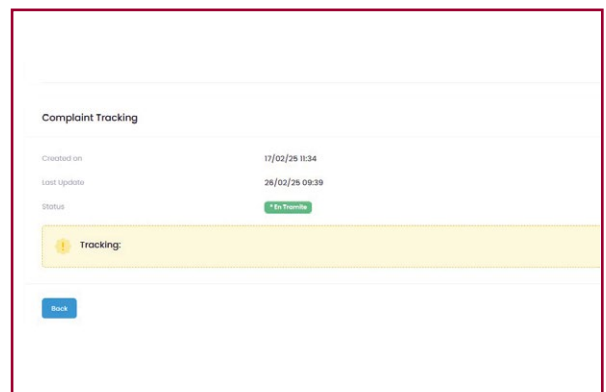
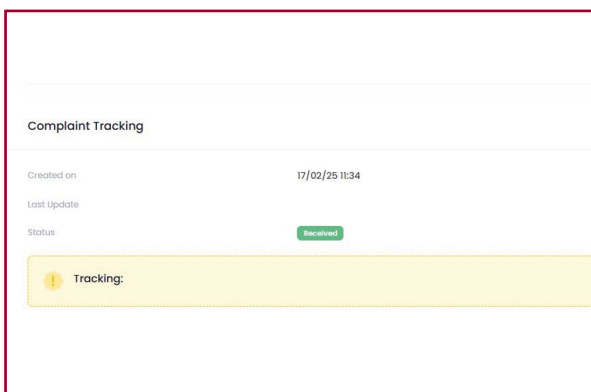
FOLLOW-UP ON THE COMPLAINT

All complaints submitted through the channel's form have an associated tracking code. The status of a complaint can be consulted from the channel's home page in the section ***"Follow up a complaint"***.

A space is provided where the tracking number provided with the acknowledgement of receipt may be entered. To inquire about the status of the complaint, click on the query button



A new screen will open with the information.



BASIC PRINCIPLES OF THE INTERNAL SYSTEM

Everything contained in this manual and the internal reporting system itself complies with the requirements of regulation standards:

- 1.-Identification of internal information channel(s) with which they are associated
- 2.-The inclusion of clear and accessible information on external reporting channels to the competent authorities.
- 3.-Issuing an acknowledgement of receipt to the informant within seven calendar days of reception of the communication.
- 4.-Determining a deadline for responding to the investigation proceedings, which may not exceed three months from the receipt of the communication.
- 5.-The possibility to maintain communication with the informant and, if deemed necessary, to request additional information from the informant.
- 6.-Establishing the rights of the person concerned being informed of the acts or omissions attributed to him/her, and to be granted the right to be heard at any time.
- 7.-Assurance of confidentiality when transmission is made through channels other than the established reporting channels or to staff members who are not responsible for its processing;
- 8.-Respecting the presumption of innocence and the right to honour.
- 9.-Compliance with personal data protection regulations.
- 10.-Immediate referral of the information to the Public Prosecutor's Office when the facts could be indicative of a criminal offence.

WHAT RIGHTS APPLY TO THE REPORTING INDIVIDUAL?

The internal information system needs to guarantee the following:

- 1.- Confidentiality.
- 2.- No retaliation.
- 3.- Respecting Independence.
- 4.- Data protection.
- 5.- Secret of communications.
- 6.- Proper monitoring and investigation practices.
- 7.- Protection of the informant.

**CE
AM
SA**

The logo consists of the letters 'CE', 'AM', and 'SA' stacked vertically in a bold, white, sans-serif font. The 'SA' is positioned to the right of a circular emblem. This emblem contains a stylized white tree with a dense canopy of leaves and a single leaf extending downwards from the trunk. The entire logo is centered on a solid dark red background.