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# INTERNAL COMMUNICATION SYSTEM AND COMPLAINTS CHANNEL PROCEDURE

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**GRUPO LAR INVERSIONES  
INMOBILIARIAS, S.A.**

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## TITLE I - INTERNAL COMMUNICATION SYSTEM POLICY

### 1. Introduction

Grupo Lar, in its intention to respond to any improper acts that may occur within the Group, has decided to implement an efficient **internal communication system** that guarantees effective protection of those who use it at all times.

To this end, a new **Complaints Channel** has been set up to allow all persons connected with the Group to report any improper act or reasonable suspicion of wrongdoing committed within the company.

Consequently, this System enables employees and third parties acting in an employment or professional context with the entity to report in good faith, through the Channel, and on the basis of reasonable indications, those facts that may entail the materialisation of a legal or criminal risk for the Group.

In addition, those communicating through internal channels shall be informed, in a clear and accessible manner, of the possibility of using external reporting channels to the competent authorities (e.g. Independent Authority for the Protection of the Informant "IAI") and, where appropriate, to the institutions, bodies, offices or agencies of the European Union.

Finally, the internal communication system implemented by Grupo Lar includes:

- a) A **policy** outlining the general principles of internal information systems and informant protection, which must be duly publicised within the organisation.
- b) A **procedure** for managing the information received (Complaints channel).

### 2. Guiding principles

The general principles governing the operation and management of Grupo Lar's internal communication system are as follows:

- a) Transparency and accessibility:** Grupo Lar's internal communication system shall be made public through its website, where it shall appear on its home page, in a separate and easily identifiable section.
  
- b) Confidentiality and anonymity:** The configuration of Grupo Lar's internal communication system must meet the guarantees of confidentiality and anonymity, as well as the correct practices of monitoring, investigation and protection of the informant.



Grupo Lar adopts the necessary measures regarding the identity of the informant, as well as the data to which it has access regarding an irregular action through the Channel. The administrators of the Complaints Channel and its control bodies shall undertake to maintain the required confidentiality in all actions and in relation to all persons involved.

- c) Good faith:** Anyone making a communication must do so in accordance with an unwaivable principle of good faith, with sufficient reasons and objective evidence to demonstrate the existence of non-compliance. The submission of false, misrepresented or unlawfully obtained information must therefore be avoided.
  
- d) Objectivity and impartiality:** Grupo Lar's internal communication system guarantees that all communications received through its Complaints Channel will be treated and managed according to the same criteria, regardless of who makes them and who they concern, without establishing any difference or privilege based on the circumstances of individuals or their position in the hierarchical and functional organisation chart of the company.
  
- e) Informant protection:** Grupo Lar's internal communication system protects all informants against any type of retaliation that may be carried out by the entity as a consequence of the communication made.

Among the main requirements for obtaining protection, the following can be highlighted:

- The information on the irregularities was obtained in the context of work activity.
- The person reporting the irregularity has reasonable grounds to believe that the information is true, even if he or she does not provide conclusive evidence, reasonable suspicion being sufficient.

- f) Prohibition of retaliation:** Grupo Lar's Internal Communication System expressly prohibits acts constituting retaliation, including threats of retaliation and attempted retaliation against persons who submit a communication through the Channel.

Retaliation means any acts or omissions which are prohibited by law, or which, directly or indirectly, result in unfavourable treatment that places the persons subjected to them at a

particular disadvantage compared to another person in the employment or professional context, solely due to their status as informants.

Finally, it should be noted that Grupo Lar's internal communication system guarantees that people who report or disclose infringements through the Complaints Channel will have access to various support measures (e.g. information, legal advice, etc.).

### 3. Scope of application

In this section, we can distinguish the different areas of application which are covered by this protocol, as the following:

#### **Material scope**

Grupo Lar's internal communication system allows the option of reporting certain irregularities through the Complaints Channel:

- a) Infringements of European Union law (financial interests).
- b) Criminal offences.
- c) Serious or very serious administrative offences.

#### **Subjective scope**

Grupo Lar's internal communication system is extended to a large number of people who maintain professional or employment ties with the entity, as well as to those who are in any of the following situations:

- Persons who have terminated their professional relationship.
- Volunteers.
- Trainees.
- Workers undergoing training or even persons participating in selection processes.
- Persons providing assistance to the informant.
- People around them who may suffer retaliation.
- Legal entities owned by the informant.

In the same vein, protective measures also include workers' representatives advising and supporting the informant.

#### 4. System administrator

In order to guarantee a more effective management of the Complaints Channel, Grupo Lar has an **Ethics Committee** that assumes the functions derived from the implementation of the Channel. This committee will be made up of the Corporate Financial Director, the Secretary of the Board and the Corporate Director of Human Capital.

Within the Ethics Committee, the Corporate Director of Human Capital will be **responsible for the Internal Communication System**, whose function will be to manage the communications made through this system.

The following table lists the person responsible for the Complaints Channel as well as the bodies responsible for admitting, processing and resolving a communication:

<b>Complaints Channel Manager</b>	Cristina Rodríguez Rom
<b>Body admitting and processing the communication</b>	Ethics Committee (canaldenuncias@grupolar.com)
<b>Communication resolution body</b>	Ethics Committee

#### 5. Data protection

The processing of personal data, as well as the files and other documentation analysed within the scope of application of Grupo Lar's Internal Communication System, will be governed by the provisions of:

- Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.
- Organic Law 3/2018, on the Protection of Personal Data and guarantee of digital rights.
- Organic Law 7/2021 on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offences and the execution of criminal penalties.

Grupo Lar guarantees and is responsible for complying with the appropriate technical and organisational security measures in terms of data protection and confidentiality of information.

Personal data shall not be collected where it is manifestly not relevant for the processing of specific information or, if collected accidentally, shall be deleted without undue delay.

Access to personal data contained in the Internal Communication System shall be limited, within the scope of its powers and functions, to the following only:

- The System Manager and whoever manages it directly.
- The human resources manager, only when disciplinary action against an employee is likely to be taken.
- The person in charge of the legal services of the entity, should legal action be taken in relation to the facts described in the communication.
- The data processors who may be appointed from time to time.
- The Data Protection Officer.

The data of the reporter, employees and third parties shall be kept in the system only for as long as it is necessary to decide whether to open an investigation into the facts reported.

In any case, if three months have elapsed since receipt of the communication and no investigation has been initiated, the communication shall be deleted, unless the purpose of storage is to leave evidence of the operation of the system.

Complaints that have not been followed up may only be recorded in anonymised form, without the obligation to block provided for in article 32 of Organic Law 3/2018 being applicable.

Grupo Lar has a Data Protection Officer responsible for all processing carried out, including this internal communication system.

All personal data will be treated confidentially by Grupo Lar for the purpose of managing the complaints received, as well as, where appropriate, to carry out the necessary actions for the investigation of the reported facts and, if necessary, to take the corresponding disciplinary measures. For the investigation of the complaint, Grupo Lar may call witnesses to the facts reported in order to obtain more information about the complaint, and in the event of a criminal, disciplinary or sanctioning investigation, the data may be communicated to the Judicial Authority, the Public Prosecutor's Office and/or the competent administrative authority.

The basis for the processing is the fulfilment of a legal obligation (Law 2/2023 of 20 February on the protection of persons who report regulatory infringements and the fight against corruption). The personal data will be kept for the periods of time established by the aforementioned law and included in this document.

You may exercise your rights of access, rectification, deletion, opposition, not to be subject to automated individual decisions, portability and limitation of the processing of your data by contacting Grupo Lar, located at c/ María de Molina, 39. Planta 10. 28006 Madrid or [dpd@grupolar.com](mailto:dpd@grupolar.com), accompanied by a copy of your ID card duly proving your identity. You have

the right to file a complaint with the Spanish Data Protection Agency (AEPD) or with the Data Protection Officer (DPO) of Grupo Lar Management Services Iberia, S.L. (dpd@grupolar.com), if you consider that your rights have been infringed.

In the event that you provide personal data of a third party other than the complainant or respondent, you must expressly inform said third party in writing that their personal data will be processed for the same purposes and for the same transfers as stated above.

### **6. Sanctioning regime**

The Internal Communication System shall be subject to a system of penalties, considering as infringements, amongst others, any action that entails an effective limitation of the rights and guarantees provided for, introduced through contracts or agreements at individual or collective level, any attempt or effective action to hinder the submission of communications or to prevent, frustrate or slow down their follow-up, including the provision of false information or documentation by those required to do so, the adoption of any form of retaliation, or the violation of the guarantees of confidentiality and anonymity, amongst others.

The exercise of sanctioning powers corresponds to the Independent Authority for the Protection of Informants, A.A.I., and to the competent bodies of the autonomous communities, notwithstanding the disciplinary powers that the competent bodies may have within each organisation.



## TITLE II - COMPLAINTS CHANNEL MANAGEMENT PROCEDURE

### 1. Introduction

The Complaints Channel forms part of Grupo Lar's internal communications system, allowing information to be submitted on certain types of infractions that may be committed within the entity.

### 2. Phases of the procedure

The procedure for making a communication consists of the following steps:



#### 2.1 Communication of information

The communication can be made through the mailbox established for this purpose at the following link: <https://buzoncompliance.es/>

The communication may be made either **anonymously** or **identified**, and may be made in **writing** or **orally**, or both, while guaranteeing the confidentiality of the informant at all times.

A **face-to-face** meeting may also be requested through the mailbox, which will be held within a maximum period of 7 days.

In terms of content, it should reflect the following minimum requirements for conducting an internal investigation, if necessary:

Informant	Action	Recipient
<b>Identified</b>	<p>The communication identifying the reporting subject would include the following references:</p> <ul style="list-style-type: none"> <li>Name and surname of the informant and ID card number (or similar)</li> <li>Contact details: telephone, e-mail, etc.</li> <li>Name of the company to which he/she belongs.</li> <li>Approximate date of action.</li> <li>The subject matter and reasons for the communication: the facts reported should be described in a precise and concrete manner. In addition, the subject may attach any evidence available to him/her.</li> </ul>	Ethics Committee

	<ul style="list-style-type: none"> <li>• Details of the person reported (if known).</li> <li>• Whether or not customers are affected.</li> </ul>	
<b>Anonymous</b>	<p>The communication in anonymous form would include, amongst others, the following references:</p> <ul style="list-style-type: none"> <li>• Name of the company with which the business relationship was maintained.</li> <li>• Details of the person reported (if known).</li> <li>• Approximate date of occurrence.</li> <li>• The subject matter and reasons for the communication: the facts reported should be described in a precise and concrete manner. In addition, the subject may attach any evidence available to him/her.</li> <li>• Whether or not customers are affected.</li> </ul>	Ethics Committee

## 2.2 Record of Communication

Grupo Lar will empower the Ethics Committee to register all communications received.

When the informant makes the communication, he/she receives an **alphanumeric code** with which he/she can track the status of the communication through the following link: <https://buzoncompliance.es/seguimientoComunicaciones.html>

In the case of **identified communications**, you will also receive a validation email to the email address provided, which must be validated within 24 hours.

In the event that the informant requests a **face-to-face meeting**, information on the day, time and place of the meeting will be sent within 7 days.

Once the information has been registered, Grupo Lar will verify that the communication exposes facts or conduct that are covered by both the material and subjective scope of this channel. Once this initial assessment has been carried out, a decision will be made on the matter, taking any of the following decisions:

### Admission of communication

Admission shall be notified within five working days of the acknowledgement of receipt, unless the notification was made anonymously.

### Inadmissibility of communication

Provided that:

- The facts under examination are not plausible or do not constitute an infringement of the law, in accordance with the provisions of this regulation.
- The communication is unfounded or there are indications that it was obtained through the commission of a criminal offence.
- The communication does not contain significant new information on infringements compared to a previous communication for which the analysis has been completed.

Inadmissibility shall be communicated to the informant within five working days of the acknowledgement of receipt, unless the communication was made anonymously.

### 2.3 Communication research

Where an **identified communication** has been made, the maximum time limit for responding to the investigation proceedings shall not exceed three months from receipt of the communication.

In the case of an **anonymous communication**, the time limit for reply shall be three months from the expiry of the seven-day period following the communication.

However, whenever possible, the response to the informant shall be provided within a reasonable period of time, given the need to address the reported problem promptly, as well as the need to avoid unnecessary public disclosure of information.

The investigation shall include all those actions aimed at verifying the truthfulness of the facts reported. Notwithstanding the right to make written allegations, the investigation shall include, whenever possible, an interview with the person concerned in which, always with full respect for the presumption of innocence, he/she shall be invited to explain his/her version of the facts and to provide such evidence as he/she considers appropriate and pertinent.

Once all the relevant information has been obtained from the informant, an investigation report will be drawn up by an internal or external instructor (hereinafter the Instructor) who will set out the guidelines to be followed during this stage of the process.

Once the investigation has been completed, a report with the main conclusions shall be drawn up and sent to the Ethics Committee for the necessary measures to be taken. In the event of a criminal offence, the facts shall be brought to the attention of the Judicial Authority, the Public Prosecutor's Office and/or the competent administrative authority.

Throughout the investigation process, the right of the person reported to be informed of the actions or omissions attributed to him/her and to be heard at any time shall be guaranteed, and his/her rights to judicial protection and defence, access to the file, confidentiality, confidentiality of identity and presumption of innocence shall be guaranteed.

### **2.4 Conclusion and notification to interested parties**

The communication process shall be in writing and the Ethics Committee shall describe the actions and statements made, including:

- Details of the informant and assurance of confidentiality.
- Details of the reported person.
- Gathering information or evidence from both parties or witnesses.
- Final report which should cover: type of communication, statement of the facts reported, the means adopted to investigate it, any documented findings and any corrective action that may be recommended.

The Ethics Committee shall issue the final report before the end of the three-month period, as well as a proposal for appropriate sanctions depending on the seriousness of the conduct detected, and shall inform the informant and the reported person of the measures taken, in accordance with the legislation in force and in accordance with Grupo Lar's internal rules.

## **3. Supervision and control**

The Ethics Committee shall monitor the proper functioning of the Complaints Channel, and shall compile an annual report on its operation, including at least the following information:

- Number of communications received.
- Origin of communications received (internal/external).
- Type of communications received.
- Number of communications investigated.
- Conclusion of investigated communications.
- Corrective measures taken.

## **4. Communication of the Complaints Channel**

Grupo Lar undertakes to disseminate the Complaints Channel to all stakeholders through the website and to its employees through the internal communication means available to the company. The information provided must include the confidentiality of the communications received, the protection of the informant and the management of the complaints by the Ethics Committee.

## **5. Information Registration**

Grupo Lar, must keep a record book containing the information received and the internal investigations to which it gives rise, guaranteeing, in all cases, the confidentiality of its contents.

Personal data relating to the information received and to the internal investigations referred to in the preceding paragraph shall be kept only for such period as is necessary. In no case may data be kept for a period longer than 10 years.

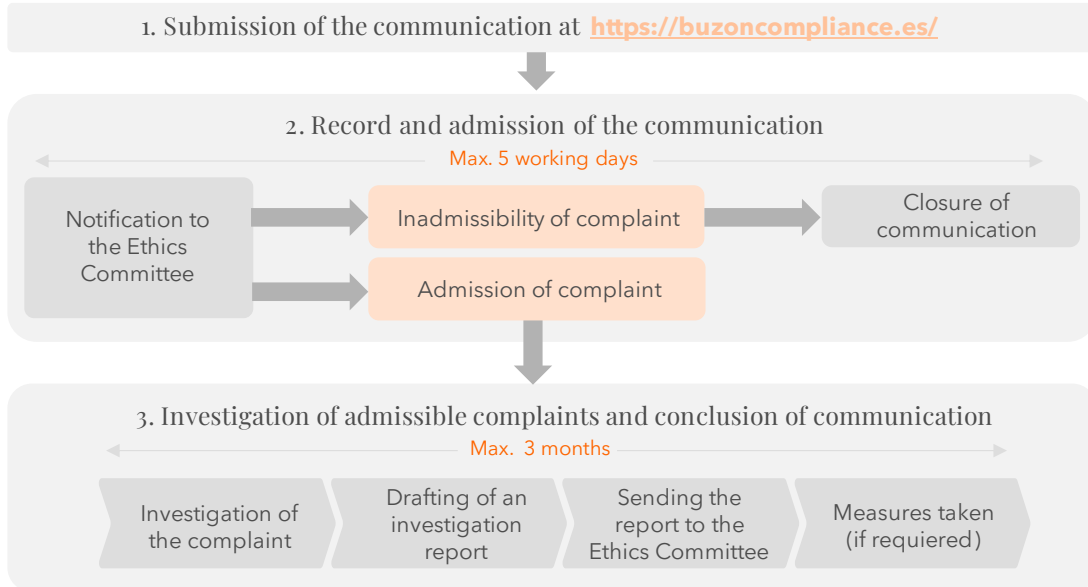
## **6. Approval and entry into force**

These Regulations were approved by Grupo Lar's Appointments and Remuneration Committee on 23 March 2023, after approval by the Ethics Committee, and came into force on the day following their approval.



## Annex I - Stages of the Complaints Channel procedure

### Procedure in the case of anonymous reporting



### Procedure in the case of identified communication

