



ELABORADOS

NATURALES

**ESSENTIAL PRINCIPLES OF THE
COMPLAINT MANAGEMENT
PROCEDURE**

	ESSENTIAL PRINCIPLES OF THE COMPLAINT MANAGEMENT PROCEDURE	Versión 1
		Julio 2023
		Página 1 de 3

The Complaints Management Procedure of the entity called "ELABORADOS NATURALES DE LA RIBERA DEL EBRO, S.L." (hereinafter, "NATURAL ELABORATIONS") establishes a framework for reporting regulatory and ethical violations within the organization and aims to promote a corporate culture of compliance and work and professional ethics, as well as absolute respect for current legislation.

Area of application

This Procedure will apply to natural persons with a direct or indirect relationship with ELABORADOS NATURALES, who have obtained information about infringements in a work or professional context, current or already completed.

ELABORADOS NATURALES has an Internal Information System, which has a channel, with differentiated functions:

- (i) On the one hand, the Channel exists so that the people mentioned above can report irregularities, any non-compliance or behavior contrary to the Law, which could constitute serious criminal and/or administrative infractions.
- (ii) On the other hand, the Channel has also been created to collect complaints regarding harassment, as this concept is defined in the "Protocol for prevention and action in cases of harassment", to which reference has also been made.

Information Channels

Communications to the Internal Information System can be made in writing, verbally or in both ways: In the case of written communications, these may be channelled by any of the following means:

- (i) Through email, using the following address: canaldeenuncias@elaboradosnaturales.es
This will be managed exclusively and under the strictest duty of confidentiality, by the people who make up the Ethics Committee.
- (ii) As an alternative to the above, complaints may be raised, by postal mail, through a letter addressed to:

Attention to the Responsible for the Internal Information System
ELABORADOS NATURALES DE LA RIBERA DEL EBRO, S.L.
Polígono Industrial Bodega Romana s/n (31360 - Funes, Navarra)

Management and processing

All complaints received are recorded in a record book, guaranteeing the confidentiality and security of the information.

The Management Manager will analyse and verify the complaints and may hire external professionals to investigate the reported events. During the investigation process, the confidentiality of both the informant and the accused will be guaranteed, and the presumption of innocence and the honour of the accused will be respected.

Upon receipt of the complaint, an acknowledgment of receipt will be sent within a maximum period of seven (7) calendar days.

	ESSENTIAL PRINCIPLES OF THE COMPLAINT MANAGEMENT PROCEDURE	Versión 1
		Julio 2023
		Página 2 de 3

During the processing of the complaint, it is possible to maintain communication with the informant and, if considered necessary, request additional information.

The maximum period for the investigation and issuance of a final report is three (3) months, although it may be extended for another three (3) months, maximum, in cases of special complexity.

Once the investigation is concluded, a report will be issued that includes the events reported, the evaluation, the results of the investigation and the measures adopted.

When the reported facts could constitute a crime, the information will be immediately sent to the Public Prosecutor's Office.

Guarantees and protection of personal data.

Measures are established to control and prevent retaliation against the informant.

In addition, the procedure is monitored annually, and its effectiveness is evaluated, with the aim of improving the protection of informants and responding effectively to complaints.

Guarantee of the right of the person reported to be informed of the actions or omissions attributed to him or her, and to be heard at any time.

Regarding data protection, ELABORADOS NATURALES guarantees the confidentiality and protection of the identity of the informant, even when the communication is sent through reporting channels other than those established.

Personal data is only disclosed when necessary to carry out the investigation or comply with legal requirements, in compliance with personal data protection legislation.

COMPLETE INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA IN THE ETHICAL CHANNEL / INTERNAL COMPLAINTS

Elaborados Naturales de La Ribera del Ebro, S.L. is the Responsible for the Processing of the personal data provided and informs you that this data will be processed in accordance with the provisions of the current regulations for the protection of personal data, for which reason the following information is provided:

Purpose of the treatment: the adequate management of our internal information system or ethical channel, processing the corresponding irregularities notified through it, and deciding on the origin of starting an investigation, in order to detect possible crimes and prevent the imposition of any type of responsibility to Elaborados Naturales de la Ribera del Ebro, S.L., as well as to avoid any type of conduct contrary to the internal or external regulations of the entity or to the general or sectoral regulations that may be applicable to it.

Legitimation for data processing: the legal basis for data processing is compliance with a legal obligation established in articles 10 and 13 of Law 2/2023, of February 20, regulating the protection

of people that report on regulatory violations and the fight against corruption, to have these internal information systems (article 6.1.c GDPR).

Confidentiality of your identity: in accordance with article 31.1 of Law 2/2023, we inform you that your identity will, in any case, be confidential and that it will not be communicated to the persons to whom the reported facts refer or to third parties.

Data conservation criteria: the data will be kept for a maximum period of three months, or six if the investigation has been extended, following notification of the irregularity if the facts have not been proven and if they do not result necessary for other purposes or for evidentiary purposes of due control and supervision in the prevention of crimes. In the event that the facts are proven or with sufficient evidence, the data will be kept as long as necessary (not being kept in the internal complaints information system itself) for the exercise by the entity of its rights before the courts of justice, and when it is no longer necessary to do so, they will be deleted with appropriate security measures to guarantee the anonymous of the data or its total destruction.

Data communication: the data will not be communicated to third parties unless there is a legal obligation or it is necessary for the management and performance of the protocol, such as, but not limited to:

- Courts and Tribunals, as well as other possible conflict resolution bodies.
- State Security Forces and Bodies.
- Notaries and registrars.

With suppliers who need access to your personal data to provide the services that we have contracted from them or who, due to the operation of our electronic services (website and emails), may have access to certain personal data, we have signed contracts of confidentiality and order of processing of personal data necessary and required by regulations to protect your privacy (article 28.3 RGPD).

Rights that assist the Interested Party:

- Right of access, rectification, portability and deletion of your data and the limitation or opposition to its processing.
- Right to file a claim with the Control Authority (www.aepd.es) if you consider that the treatment does not comply with current regulations.

Contact information to exercise your rights:

Elaborados Naturales de la Ribera del Ebro, S.L. Polígono Industrial Bodega Romana, s/n. - 31360 Funes (Navarra). E-mail: rrhh@elaboradosnaturales.es

The interested party guarantees the authenticity, accuracy, and veracity of all the information they provide us, committing to keep the personal data they provide us updated so that they respond, always, to their real situation. The Interested Party will be solely responsible for any false, inaccurate statements and any damages that they may cause.