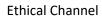




# **ETHICAL CHANNEL**

**Policy** 

February 2024







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#### 1 INTRODUCTION

## 1.1 Purpose and context.

An effective communication system strengthens our commitment to promoting an ethical and honest culture within our partnership between Stellantis Financial Services Europe and Santander Consumer Finance.

All Joint Ventures companies will have an internal reporting system, which aims to detect and act on any conduct that breaches the Code of Ethics, including non-proper behaviours from employees, while fostering an atmosphere in which employees, executives, directors and any third party who interacts with them may speak up and be truly heard.

The Ethical Channel can be used to report suspicions regarding work-related conduct such as:

- Illegal acts in the workplace.
- Irregularities and breaches of the Code of Ethics and its implementing regulations that may result in disciplinary action.
- Inappropriate accounting, auditing or internal control practices, or inappropriate influence on external auditors (SOX).
- Infringements of the anti-money laundering and terrorist financing regulations, the internal procedures to ensure compliance with them, or Bribery and Corruption.
- Conduct that may constitute an act contrary to the law or other applicable regulation, in particular a serious or very serious criminal or administrative offence or a breach of European Union law<sup>1</sup>.
- Acts or conducts related to discrimination, harassment, disrespectful behaviour or respect for private life.

**Appendix I** to this policy contains a list of the types of conduct that may be reported through The Ethical Channel and the related definitions.

#### 2 CRITERIA

The Ethical Channel is structured in the following levels to achieve effective implementation:

- a) **Common standards (Section 2.1)** designed taking into account international standards and the best practices.
- b) **Management criteria (Section 2.2)** to achieve standardised, consistent management for risk management and identification of the main concerns within the partnership.
- c) Guarantees for the user (Section 2.3).
- d) **Local initiatives (Section 2.4):** the JVs will be able to put in place any local initiatives they consider appropriate to encourage the use and better management of their respective reporting systems.

<sup>&</sup>lt;sup>1</sup> Persons reporting this type of conduct will also be protected by the specific protection rules set forth in Law 2/2023.



#### 2.1 Common standards.

The common standards that must be met are as follows:

#### Tone from the top.

The support and involvement of senior management in the existence and management of Ethical Channel is key to ensuring that it works properly and that employees and other stakeholders trust it.

The commitment of the Partnership's senior management to behave with integrity, honesty and respect for the law and the rights of others is key to fostering a culture of ethics and compliance.

It is a highly recommended best practice that the local CEO sponsor the Ethical Channel through internal communications or other forms of communication (videos, for example), highlighting the importance of using it to report irregularities that may be investigated and give rise to improvements in the entity.

The Cooperation Compliance Committee has designated the JV's Chief Compliance Officer (CCO) as the person responsible for managing the internal reporting system within the JVs. This designation must be reported to the Independent Reporter Protection Authority<sup>2</sup>.

The functions involved in managing Ethical Channel must keep the person responsible for managing the internal reporting system informed of the result of any investigations conducted and of the main actions they perform in this connection.

## Duty to report any illegal acts or breaches.

All the members of staff, including members of senior management and of the governing bodies of the JVs are obliged to report to the related company any suspected serious or very serious administrative or criminal offence or breach of European Union law, and any suspected unlawful act.

## Awareness-raising initiatives.

It is important to raise awareness of the existence of the channels among all employees so that they know how important it is to use them to create a positive working environment.

For this purpose, initiatives will be run regularly to raise awareness or provide training so that all employees can see the importance of this channel, its features and how it works.

## Easy access to the channel.

The Ethical Channel must be easily accessible and available for any employee or third party to locate.

• Information for employees on statistics, results and lessons learned from reports received through the Ethical Channel.

<sup>&</sup>lt;sup>2</sup> According to the Spanish Law. It may defer in other countries.





Employees will be informed, through general communications, about the management and consequences of reports received through Ethical Channel<sup>3</sup>.

The aim of this initiative is to promote the use of the channel by showing that actions are being taken when issues are raised, to provide information on actions taken, and to ensure that the measures and improvements implemented at each unit can be used as an example to prevent similar behaviour in the future.

 When requested by the reporters, reports made through the Ethical Channel will remain anonymous.

The policy permits anonymous reporting, unless local law provides otherwise; however, it is recommended for the reporter to identify themselves. All reports received will be treated confidentially.

All reports will be completely confidential, whether or not they were made anonymously.

 Possibility of using the Ethical Channel to report conduct not aligned with the discrimination, harassment, disrespectful behaviour or respect for private life.

All employees are expected to act respectfully towards their team members, other employees and, more generally, all individuals with whom they are in professional contact. They are expected to respect the private lives of other individuals and refrain from spreading information they may have gained by chance or in the course of their work.

 Management of Ethical Channel by an external provider to ensure the confidentiality and anonymity of reports.

As a best practice, it is considered very useful to have a platform for receiving and managing reports that is managed by an external provider in order to ensure the confidentiality and anonymity of the reports, without prejudice to the other channels in place, mentioned in section 2.3 below.

Mechanisms in place to prevent conflicts of interest while reports are being investigated.

One of the guarantees inherent to this channel is the prevention of conflicts of interest during investigations (Section 2.3). It is therefore essential to establish appropriate controls and mechanisms to mitigate these situations.

• Regular review of the Ethical Channel by Internal Audit

Internal Audit will review the JVs' channels and, as part of its functions, it will regularly assess, according to its risk assessment and the annual audit plan, whether the channels comply with these common standards.

<sup>&</sup>lt;sup>3</sup> This communication may also be carried out with the legal representation of the working people (trade unions).





#### 2.2 Management criteria

JVs' channels must comply with the following management criteria:

• Taxonomy of cases that may be reported using the Ethical Channel

**Appendix I** contains a list of the types of cases and the definitions that are applicable at the time of approving this policy. This taxonomy should be applied by all the JVs for classifying the cases reported using the Ethical Channel. The list of types of cases may be reviewed and modified by Cooperation Compliance Committee. The Committee will notify the local Compliance functions of any modifications made to the list of types of cases to ensure that all cases are classified in a standardised manner.

Channels enabled for employees and third parties (vendors, customers, etc.)

The Ethical Channel is provided to receive reports made by:

- JV professionals<sup>4</sup>;
- Shareholders;
- Members of the board of directors;
- Interns;
- JVs service vendors;
- o Customers;
- And any other third party that, being in the process of acquiring any of the above conditions or after having lost it, has been affected by the conduct reported in that process.
- Processing of cases received by other internal (e.g., Human Resources, Internal Audit and control functions) or external sources.

The Ethical Channel receives all reports made by employees or third parties who have personally decided to use this channel for this purpose.

In addition, Compliance may send cases to the WB channel that have come to its attention through other internal or external sources and that represent a suspected breach of the law or of the Code of Ethics and, in particular, a suspected serious or very serious administrative or criminal offence or breach of European Union law, without the need to seek prior consent from the employee concerned<sup>5</sup>.

Any communications and/or conversations held between employees and Human Resources staff in relation to work matters or conduct that are not aligned with the corporate behaviours will not be included in the Ethical Channel by the Human Resources staff unless expressly requested by the reporter.

<sup>&</sup>lt;sup>4</sup> The reports will refer to known facts within the scope of a professional relationship that is ongoing or has ended (e.g. former employees) or has not yet begun (e.g. candidates in recruitment processes).

<sup>&</sup>lt;sup>5</sup> In this regard, it will not be necessary to include non-compliances identified by the Compliance function as part of the controls it routinely carries out.





Any person receiving a report covered by the Ethical Channel who is not responsible for managing the report must refer it immediately to Ethical Channel, while always respecting the reporter protection measures set forth in this policy, the data protection provisions and all other applicable regulations.

To this end, training and awareness initiatives will be developed and launched to ensure that the employees know how to act if they receive a report whose management is not their responsibility.

Any breach and, in particular, conduct that may constitute a serious or very serious administrative or criminal offence or breach of European Union law, which becomes known in the media, may be managed through The Ethical Channel, provided that it meets the admission acceptance criteria set forth in section 1.2 above.

#### • Mechanisms for preventing conflicts of interest during investigations.

When managing cases that are received through the Ethical Channel, the general principles for managing conflicts of interest will be taken into account: (i) prevent; (ii) disclose; and (iii) abstain from participating in the decision.

If a potential conflict of interest arises in relation to the person (or team) responsible for carrying out the investigation, the case must be reassigned to a different person or team.

In exceptional cases, it may be necessary to use an external investigator.

#### • Rights of the reporter and of the person under investigation.

The internal investigation will respect the fundamental rights of the reporter and of the person under investigation.

People who make reports through the Ethical Channel will have the right to confidentiality of the facts reported, withholding the identity, and may not be subject to reprisals for using the channel in good faith.

All information, documentation, evidence, deliberations, etc. relating to the internal investigation shall remain confidential. Only the persons specifically designated will participate in the internal investigations.

Should it be necessary to share documentation generated in the investigation (including the final report) with anyone apart from those designated to carry out the investigation, this must be authorised by the heads of Compliance and Human Resources.

The person under investigation will be informed of the actions or omissions attributed to them (in the time and form deemed appropriate to ensure the successful outcome of the investigation). The person under investigation will have the right to be heard at any time, and will be given the opportunity to put forward arguments and use any means of defence deemed appropriate.

In all cases, respect for the presumption of innocence, the good repute, and access to the record of the person under investigation will be guaranteed during the investigation. Access to the record will be understood as the right to know the facts attributed to them without revealing information that could identify the reporter or compromising the outcome of the investigation.

This duty to inform the person under investigation will not apply in cases where the report is unfounded, is not directly processed through this channel or refers to cases of money laundering and terrorist financing. These cases will be governed by the prevailing related legislation and internal





regulations, especially with regard to the prohibition on disclosure in relation to reports and examination of transactions. The duty of information to the person under investigation will not be applicable when it implies compromising the confidentiality of the reporter, in accordance with the provisions of the data protection regulations.

The persons under investigation may explain their version of events and provide the means of proof they consider necessary and may present their arguments in writing. Similarly, reporters' identity will be protected and the confidentiality of the events and data of the procedure will be guaranteed.

It must be ensured that the internal investigation procedure is carried out independently, without any conflict of interest, actual or potential.

Likewise, actions carried out by the investigating team must be proportional and must respect in all cases the rights to privacy, honour and reputation of the people involved in the facts investigated, as well as the presumption of innocence.

## • Maximum duration of the investigation and resolution of cases received.

The Ethical Channel will acknowledge receipt to the reporter of any communication received within a maximum period of seven days.

Cases received through The Ethical Channel must be processed within a maximum of 60 days from receipt of the communication, unless the case is especially complex or there are valid reasons justify extending this deadline by a further 30 days.

The Person Responsible for Managing the Internal Reporting System<sup>6</sup> will be informed of cases in which the investigation is taking longer than 60 days when he/she is not directly involved.

## Processing of cases received.

All cases reported using the Ethical Channel will be appropriately processed, without prejudice to their rejection for processing for the reasons established in the Policy, or because they are deemed unfounded during the process.

In cases where additional information is required from the reporter in order to begin or continue with the investigation, the information will be requested and must be received in 15 days or the case will be closed and classified as "insufficient information".

During the investigation, the investigator may gather all the information and documentation they consider appropriate from any functions. Any assistance considered necessary may also be requested from Internal Audit or other functions.

#### Oversight, reporting and escalation.

- The JVs must send a quarterly report to the Cooperation Compliance Committee<sup>7</sup> with the KPIs
  on all cases received through the Ethical Channel. Nonetheless, they must expressly specify
  which ones refer to cases reported by reporters identified as employees.
- Any cases affecting a member of Senior Management or of the governing bodies of a JV must be escalated by local Compliance to the President and Secretary of the Cooperation Compliance

<sup>&</sup>lt;sup>6</sup> Chief Compliance Officer

<sup>&</sup>lt;sup>7</sup> Through the Regulatory Compliance function in SCF.





Committee for its information, without prejudice to its being managed and investigated on a local level.

- Each Compliance function will analyse trends and patterns regarding measures adopted in the event of irregularities or breaches to identify fluctuations in the percentage of disciplinary measures that are being adopted at the respective local unit.
  - Any statistical outliers that are identified will be reported to the competent governing bodies.
- The local Compliance functions must report in due time and proper form when reports are received regarding irregularities in the area of accounting or auditing<sup>8</sup>, and must escalate them to the local Audit Committee, sending the resolution to the Cooperation Compliance Committee. SCF Regulatory Compliance will inform to the Audit Committee of Santander Consumer Finance, S.A., and the latter to the Audit Committee of Banco Santander, SA.

## Disciplinary system

Upon completion of the investigation, a ruling will be issued on the case, determining whether it is considered that a breach of the law or of internal or any other applicable regulations has occurred, whereby:

- If it is considered that the existence of a breach has not been established, a decision will be taken to close the case with no need to take any action, and to shelve it. The reporter and the persons concerned will be informed accordingly.
- o If it is considered that the existence of a breach has been demonstrated, it will be referred to the Irregularities Assessment Committee or to the competent body to initiate the adoption of appropriate disciplinary measures or the adoption of corrective or preventive measures of an organisational or educational nature, complying with the provisions of the Collective Bargaining Agreement or the applicable legislation.

If the facts might be indicative of a criminal offence, the person responsible for managing the Ethical Channel will submit the file to Legal. The latter will immediately submit the related information to the public prosecutor or, if the facts affect the financial interests of the European Union, to the European public prosecutor's office. However, if the evidence is clear, this decision to submit the information will be taken before the investigation is concluded.

Likewise, measures may be adopted to improve the procedures, policies or tools of the local unit to prevent a recurrence of the detected irregularity, and to foster the Simple, Personal and Fair culture and compliance with the corporate behaviours and applicable regulations.

## 2.3 Guarantees for the user.

The guarantees defining The Ethical Channel are as follows:

## Open door policy

Reporters may use The Ethical Channel to directly report any of the situations described above, regardless of the company in which it takes place.

<sup>&</sup>lt;sup>8</sup> Mandatory obligation derived from SOX regulation.





Cases may be reported through The Ethical Channel either in writing, on the following websites, or verbally by calling to the call centre in each country:

- stellantisfinancialserviceseurope.ethicspoint.com (Computers)
- o stellantisfinancialserviceseuropemobile.ethicspoint.com (mobile version)

A face-to-face meeting with the managers of the Ethical Channel may also be requested.

In all cases, reporters also have the option of reporting conduct that may be considered to constitute serious or very serious administrative or criminal offences or breaches of European Union law through the channel established by the Independent Reporter Protection Authority, and through the channels established by other bodies, listed in **Appendix II** purely for illustrative purposes.

## Confidentiality and anonymity

Reports made through the Ethical Channel will be confidential and, if preferred, anonymous (see more details about anonymity in page 5).

In confidential reports, JVs will preserve the identity of the reporter, notwithstanding the legal obligations and protection of rights of individuals or legal entities accused in bad faith.

Both Compliance and Human Resources will ensure the maintenance of confidentiality. To this end, they will identify possible conflicts of interest or other circumstances that might compromise this confidentiality and they will take the necessary steps to resolve them.

Any person (including the persons concerned) having knowledge of a report received through the Ethical Channel is obliged to secrecy about the reporter's identity and the facts and circumstances related to the report.

If court or administrative proceedings are initiated because of the report made, it may be necessary to inform the competent judicial or court authority of the reporter's identity, in accordance with the law.

#### Prohibition on retaliation

Reporters who submit cases in good faith will be protected against any type of discrimination and penalisation as a result of the reports made. It is strictly prohibited to take any measure against the reporter constituting a reprisal, including the threat of retaliation, or any kind of negative consequence for having reported an action that is presumed to be illicit, irregular or not aligned with the corporate behaviours in place.

Retaliation means any act or omission that, directly or indirectly, represents an unfavourable treatment and places the person who suffers it at a particular disadvantage compared to another person, in the work environment, solely as a result of being a reporter or of having made a public disclosure.





By way of illustration, retaliations are understood to be9:

- i) Suspension of the employment contract, dismissal or termination of the employment or bylaw-stipulated relationship, including non-renewal or early termination of a temporary employment contract after the probation period has expired, or early termination or cancellation of contracts for goods or services, imposition of any disciplinary action, degradation or refusal of promotions and any other substantial modification of working conditions and non-conversion of a temporary employment contract into a permanent one, in the event that the employee had legitimate expectations that they would be offered a permanent contract;
- ii) Damage, including to the reporter's reputation, or financial losses, coercion, intimidation, harassment or ostracism;
- iii) Unjustifiably negative assessment or references with regard to the reporter's work-related or professional performance;
- iv) Refusal of training;
- v) Discrimination, or unfavourable or unfair treatment; and
- vi) Prohibition of hiring vendors.

The protection also covers persons related to the reporter (co-workers, family members, related legal persons, etc.). It will also cover any natural person who has assisted the reporter and, specifically, to the legal representation of working people in the exercise of their advisory and support duties to the reporter.

Although, as indicated in this section, retaliations are not permitted, appropriate disciplinary measures may be taken if the reporter's report proves to be unfounded and to have been made in bad faith or if the reporter was found to have breached corporate behaviours or acted illegally. Likewise, the measures provided for in (i), (iii) and (iv) above will not be understood as retaliations when they are carried out in the regular exercise of management power under labour law, due to circumstances, facts or accredited infringements, and unrelated to the report on the Ethical Channel.

There will be safeguards against retaliations for anyone reporting any information through the Ethical Channel, provided that the report was made in good faith and in accordance with the requirements set out in this policy and other applicable regulations. Protection will not be available for persons who:

- Report information contained in earlier communications that have been ruled inadmissible for any of the reasons set out in this policy.
- Report about interpersonal conflicts that affect only the reporter and the persons to whom the report refers.
- o Report information that is public or merely constitutes rumours.
- Report information referring to actions or omissions outside the scope of application of the Ethical Channel, as defined in this policy.

<sup>&</sup>lt;sup>9</sup> Excerpts from Spanish Law 2/2023 as examples.





## Management of conflicts of interest in the handling of reports received through The Ethical Channel.

Anyone who may have a potential conflict of interest with the persons concerned in a report received through the Ethical Channel must refrain from taking part in the management of said report. The above applies equally to any person belonging to a function on which the Ethical Channel needs to rely on during the investigation.

#### 2.4 Local initiatives

The JVs may run their own initiatives separately which may be shared with Cooperation Compliance Committee to promote best practices, sharing and learning among all the JVs, while respecting the provisions of this policy in all aspects that do not contradict applicable local legislation.

#### 3 GOVERNANCE AND REMIT

The governing bodies with powers with respect to the Ethical Channel are as follows:

#### 3.1 Board of Directors and committees

The Board is responsible for establishing the internal reporting system (the Ethical Channel) and for designating its responsible person at every JV.

It is also responsible for approving this policy.

- The Cooperation Compliance Committee is responsible for the oversight of the Ethical Channel of all JVs. At local level, the Compliance Committee is the responsible for its oversight.
- Audit Committee: Where a report received through the Ethical Channel refers to accounting or auditing matters, pursuant to the Sarbanes-Oxley Act, on completion of the investigation by Compliance, the resolution will be submitted to the JV's Audit Committee, which will decide on the appropriate measures in this case, which will be reported to the Audit Committee of Santander Consumer Finance, S.A.
- Irregularities Assessment Committee: it will decide on disciplinary measures for infringements or breaches as provided for in internal regulations, and on measures additional to disciplinary measures, whether administrative or criminal, and which may also result from non-compliance or irregularities, in accordance with applicable labour law.

#### 4 OWNERSHIP, INTERPRETATION, EFFECTIVE DATE AND REVIEW

#### 4.1 Ownership of the policy

Compliance SCF is responsible for drawing up this policy.

Approval of this document will be given by the Cooperation Compliance Committee.

At local level, the Board of directors is the responsible for approving the document.





## 4.2 Interpretation

The Cooperation Compliance Committee is responsible for interpreting this policy.

## 4.3 Date of validity and review of the policy

This policy will come into force on the date it is published. Its content will be reviewed regularly and any pertinent changes or amendments will be made.

## 5 VERSION CONTROL

ID	Created by	Validated by	Approved by Committee	Date
1	Diego Martín	Philippe Mathieu	Cooperation Compliance Committee	15/02/2024

ID	Description	
1	First version of the policy.	





## APPENDIX I: TYPES OF CASES THAT MAY BE REPORTED THROUGH THE ETHICAL CHANNEL AND DEFINITIONS

Category	Sub-category	Definition
Code of Ethics	Marketing of products and services	Marketing products or services without fulfilling the obligation of treating the customer fairly by acting honestly, impartially and professionally.
	Conflicts of interest/activities outside the JV	Situations where the personal or financial interests of an employee, or of their direct relatives or any person with whom the employee has a significant relationship, interferes in any way with their ability to serve the best interests of the JV, its customers and/or its stakeholders.
	Gifts and hospitalities	When employees abuse their position at the JV by offering, delivering, promising, requesting or accepting any type of gift, benefit, consideration or hospitality in order to obtain personal benefit for themselves or a third party, thereby affecting their impartiality.
	Corruption and bribery	Acts of corruption may arise when individuals abuse their position of power or responsibility for personal gain.
		Bribery relates to acts whereby a person receives a financial or other benefit to encourage them to perform their duties or activities improperly or a person receives a reward for having already done so. This would include an attempt to influence a decision-maker by granting some additional benefit to the decision-maker, beyond that which can be legitimately offered.
		Bribery in which a national or international public official is involved.
	Anti-money laundering and terrorist financing, and sanctions	Money laundering is: (i) converting or transferring assets, knowing that such assets derive from a criminal activity, or from involvement in a criminal activity, with the aim of concealing or disguising the illegal origin of the assets or of helping the people involved to avoid the legal consequences of their actions; (ii) concealing or disguising the nature, origin, location, availability, movement or actual ownership of assets or rights over assets, knowing that such assets derive from a criminal activity, or from involvement in a criminal activity; (iii) acquiring, owning or using assets, knowing that, when they were received, such assets derived from a criminal activity, or from involvement in a criminal activity; (iv) engaging in any of the activities mentioned above, forming associations to perform this type of activity, attempting to engage in them and helping, encouraging or advising a third party to engage in or facilitate this type of activity.





	1	
	Market abuse (insider	Engaging in trading based on inside information.
	trading)	Recommending trades in the securities market based on inside information.
		Disclosing and using inside information illegally.
		Manipulating the market by trading or spreading fake news or rumours about people or companies to change or maintain the price of a security or financial instrument.
	Antitrust	Conduct that prevents, restricts, or distorts free, effective competition to the detriment of the market, of the JVs' customers and of anyone with whom a business or professional relationship is maintained. This conduct includes exchanging sensitive information with competitors, price fixing, fixing market share, and rigging bids and tenders.
	Privacy/information security/confidentiality of information	The privacy and protection of information involve refraining from disclosing information to third parties, e.g., personal data relating to customers or employees (salaries, leave, etc.), JVs' strategic/security-related information, or information relating to the entities with JVs have a business relationship. These obligations remain in place even after the employment relationship has terminated; the confidential information may not be used to obtain financial benefit.
	Insider fraud	Fraud either attempted or perpetrated by one or more internal parties against the organisation, i.e., one of the organisation's employees or subsidiaries, including cases where an employee acts in collusion without external parties.
	Cybersecurity	Cybersecurity risks are: (i) unauthorised access to or misuse of information or systems (e.g., theft of personal information, M&A plans or intellectual property); (ii) financial fraud and theft (e.g., payments redirection, withdrawal of funds from customer accounts, credit card fraud and identity theft); and (iii) disruption of business activity (e.g., sabotage, extortion and denial of service).
	Equal opportunities and non-discrimination	Conduct that is not aligned with JVs basic principles in relation to providing equal opportunities regarding access to employment and professional promotions, ensuring there is no discrimination at any time for reasons of gender or sexual orientation, race, religion, disability, origin, marital status, age or social condition.
	Sexual harassment	Disrespectful behaviour or undesired conduct of a sexual nature that is bothersome and generates an intimidatory, offensive or hostile working environment.





	Workplace harassment	Systematically hostile or offensive treatment in the working environment that provokes an intimidatory, offensive or hostile environment.
Fraud	External fraud	The type of fraud attempted or perpetrated by an external party (or parties) against the organisation of the customer under the bank's responsibility. There may be cases where an internal party is also involved in the fraud.
Accounting and auditing	Accounting and auditing	Alteration or falsification of financial information, inaccuracies in financial statements, intentionally false information, undue influence over auditors, questionable practices in accounting, auditing or internal financial controls.
Work issues and breach of corporate	Serious disrespect	Conduct that involves serious disrespect by co-workers or managers in the work environment.
behaviours	Breach of labour regulations	Any breach of the internal (legal or conventional) regulations, policies or procedures that involves non-compliance with a labour obligation or any obligations categorised in the collective bargaining agreement currently in effect.
Other	Any breach of JVs legal or internal regulations, policies or procedures in relation to functional or organisational aspects not mentioned in the categories above.	





# APPENDIX II: EXTERNAL CHANNELS FOR REPORTING BREACHES COVERED BY THE MATERIAL SCOPE OF APPLICATION OF LAW 2/2023

- Channel established by the Independent Reporter Protection Authority
- Bank of Spain: https://www.bde.es/bde/en/secciones/sobreelbanco/Transparencia/Informacion\_inst/registro-de-acti/Canal\_de\_denuncias.html
- National Markets and Competition Commission (CNMC): https://sede.cnmc.gob.es/en/tramites/competencia/denuncia-de-conducta-prohibida
- National Securities Market Commission (CNMV): https://www.cnmv.es/portal/whistleblowing/presentacion.aspx?lang=en
- SEPBLAC: https://www.sepblac.es/en/obliged-subjects/formalities/suspicious-transactions-reporting/