

# Corporate Whistleblowing Channel Regulation

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## 1 Introduction

The companies that make up the Coral Homes Group<sup>1</sup> (indistinctly, the **"Group"** or **"Coral Homes Group"**), as a sign of their commitment to ethics and in accordance with the rules in force, have a Code of Ethics and Compliance and Criminal Risk Prevention Models.

Thus, in accordance with the internal rules of the Coral Homes Group, all employees, managers, directors and associates (the **"Personnel"**), as well as the external suppliers and collaborators acting for and/or on behalf of the companies that are part of the Coral Homes Group (the **"Third Parties"**), are required to observe the legislation in force and the internal regulatory body of the Group at all times, including the Code of Ethics and the other policies and procedures approved for implementation.

In this prevention effort, the cooperation of Personnel and Third Parties, as well as customers of the holders of both real estate and financial assets, which manage the Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. companies (the **"Customers"**), and the end customers, is of great importance in order to detect any possible conduct that constitutes a potential or real breach of the internal and external rules and, where appropriate, which constitutes a criminal offence, or an administrative or labour breach.

With the aim of ensuring the effectiveness of the Compliance and Criminal Risk Prevention Models, Coral Homes Group makes a new and single whistleblowing channel available to its Personnel, as well as Third Parties, Customers and end customers which is for all the companies that are part of the Coral Homes Group (the **"Corporate Whistleblowing Channel"**). This channel is created on the basis of a technological application of an external supplier, in order to provide it with the greatest guarantees in terms of operation and confidentiality, so that all of the aforementioned can report possible risks and breaches of both the legislation in force and the internal rules of the Coral Homes Group.

Any Personnel, Third Parties, Customers and end customers that use the Corporate Whistleblowing Channel in good faith, either anonymously or revealing their identity, shall have the due protection guarantee; in particular, they shall have the right to be protected as stipulated in Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, and in the other applicable legislation in force.

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<sup>1</sup> The Coral Homes Group is made up of the following companies: Coral Homes Holdco, S.L.U. (as the parent company), Coral Homes S.L., Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. (as subsidiary companies).

## **2 Purpose**

The purpose of this Regulation is (i) to provide suitable information, in a way which is clear and easily accessible, on the use of the Corporate Whistleblowing Channel, as well as on the essential principles by means of which the management of this channel must be governed; (ii) to define the conditions that must be fulfilled for the submission, management and settlement of the reports submitted through the Corporate Compliance Channel (iii) the flow of tasks and responsibilities in order for the aforementioned to be managed correctly, in accordance with the internal rules and applicable legislation in force.

The link to access the Corporate Whistleblowing Channel appears, inter alia, in the Code of Ethics of the Coral Homes Group and on the web portals of the companies that make up the Group, on the intranet of Servihabitats and in the Compliance clauses included in the contracts signed with the Third Parties and with the end customers.

### **3 Channel subjective scope**

#### **Who can/must use the Corporate Whistleblowing Channel?**

Any person who is considered as Personnel and Third Parties, in accordance with these terms defined in section 1 above, shall be under an obligation to use the Corporate Whistleblowing Channel to communicate any event or action of which they are aware in the course of their duties which may give rise to a potential breach of the internal rules of the Coral Homes Group and/or of the legislation in force.

In addition, Customers and end customers may use the Corporate Whistleblowing Channel to communicate these types of events and actions.

Reports may also be submitted through the Corporate Whistleblowing Channel by anyone disclosing information on breaches obtained in a work-based, commercial and/or collaborative relationship which has since ended.

#### **Who can be reported through the Corporate Whistleblowing Channel?**

Any person who is considered as Personnel and any Third Party that has taken any action contrary to the provisions in the internal rules of the Coral Homes Group and/or in the legislation in force may be reported.

## **4 Corporate Whistleblowing Channel objective scope**

The objective scope of the Corporate Whistleblowing Channel includes any events and conduct that may entail a potential or real breach of the internal and external rules, and which may constitute a criminal offence, or an administrative or labour breach.

### **What must be reported through the Corporate Whistleblowing Channel?**

Any conduct considered in the Criminal Code and criminal offences stipulated in other special laws, liable to generate criminal liability for the Coral Homes Group, which is attached in **Annex I**, shall be subject to reports.

Likewise, any conduct contrary to the principles and rules of conduct which are stipulated in the Code of Ethics of Coral Homes Group and in its implementing rules may be reported through the Corporate Whistleblowing Channel.

Furthermore, any breaches of the applicable rules on special regulation, as well as the prevention of money laundering and terrorist financing or on any other regulation that constitutes an administrative and/or labour breach may also be reported.

### **What must not be reported through the Corporate Whistleblowing Channel?**

The following shall not be submitted through the Corporate Whistleblowing Channel:

- **Consultations:** Any consultations that Personnel, Third Parties, Customers or end customers may want to make in connection with the application of the Code of Ethics, its implementing rules and any other internal rules of the Coral Homes Group shall be made via the mailboxes enabled for this purpose by the companies that make up the Group ([cumplimientonormativo@servihabitat.com](mailto:cumplimientonormativo@servihabitat.com)) and ([compliance@coralh.com](mailto:compliance@coralh.com)).
- **Complaints and/or grievances:** Any complaints and/or grievances submitted by end customers, of either a commercial or operational nature (for example, maintenance, appropriateness, consumption, etc.) which in no way constitute a breach of the internal rules of the Coral Homes Group or of the legislation in force, must be addressed to the Customer Service Centre of Servihabitat, through its own website or to the mailbox [info@coralh.com](mailto:info@coralh.com) of Coral Homes.

Any reports unconnected with the objective scope of the Corporate Whistleblowing Channel shall not be accepted, including those with the purpose of consultations and complaints/grievances, or from whose text no potential breach can be deduced.

Once the report has been received, acknowledgement of receipt shall likewise be sent to the whistleblower within **seven (7) calendar days** from the date on which it is received, where the whistleblower is identified, unless this compromises the confidentiality of the communication. After the report has been analysed, a decision shall be issued regarding the non-acceptance of the report procedure within no more than **fifteen (15) calendar days**.

## **5 Corporate Whistleblowing Channel guiding principles**

### **5.1 Truthfulness, reasonable and responsible use**

Reports must be submitted through the Corporate Whistleblowing Channel in accordance with criteria which promote truthfulness, responsibility, proportionality and good faith, while communication of any false information is prohibited.

Use of the Corporate Whistleblowing Channel for purposes other than to ensure and guarantee compliance with the internal rules of the Coral Homes Group and the legislation in force is prohibited.

### **5.2 Duty of collaboration**

As well as bringing any situation or behaviour which breaches the ethical principles, internal rules or legislation in force to the attention of the companies of the Group, the Personnel is under an obligation to collaborate with the Chief Compliance Officers and the Corporate Compliance Committee in implementing the necessary measures to detect and correct any action that may entail a breach in relation to Compliance.

Likewise, the Third Parties are under an obligation to communicate any breach that occurs in the Coral Homes Group of which they may be aware.

### **5.3 Confidentiality**

Any person who may gain access to the reports shall keep the aforementioned, the investigation and the outcome of the investigation process, as well as the personal data of the persons concerned with the utmost confidentiality.

The information collected while the investigation is being carried out shall be duly stored and safeguarded in a way which guarantees its confidentiality and integrity, and any breach of this shall be sanctioned in accordance with the provisions of the Code of Ethics of the Coral Homes Group.

These duties shall remain in force even once the investigation stage has come to an end and the file for each report has been closed.

### **5.4 Presumption of innocence and right of defence principle and contradiction**

While the report is being processed, the persons concerned by the aforementioned shall have the right to the presumption of innocence, the right of defence, including the right to be heard and the right to access the file in the terms governed by the rules in force, as well as the right to the same protection as that enjoyed by the whistleblower, with their identity being kept hidden and the events and data of the procedure guaranteed to remain confidential.

In this respect, once the start of the procedure has been announced, the reported party shall have the right to provide all means of evidence deemed relevant and to make as many allegations as considered appropriate for their defence. Furthermore, they shall have access to all evidence that may have been collected, except for the identity of the whistleblower.

In any case, before the decision is issued, an express allegation procedure must be given to the reported party.



## 6 Submission of reports

The Corporate Whistleblowing Channel is configured through two URLs, <https://coralhomes.integrityline.com/> (Coral Homes Holdco, S.L. and Coral Homes, S.L.U.) and <https://servihabitat.integrityline.com/> (Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U.), depending on the company to which the whistleblower wishes to submit the report.

Upon accessing the Corporate Whistleblowing Channel from the above-mentioned URLs, the whistleblower will see several sections, with the most important ones being direct access to create a report ("**File a report**") or access to the secure communication mailbox ("**Create a secure communication Mailbox**" and "**Secure communication Mailbox**").

### 6.1 Create a report

The whistleblower accesses the "**File a report**" section and must complete the fields appearing in the form, particularly those which are configured as mandatory.

Firstly, the whistleblower must select the company of the Group concerned by the presumed breaching conduct, either Coral Homes Holdco, S.L.U. or Coral Homes S.L., at the *coralhomes* URL, or Servihabitat Servicios Inmobiliarios, S.L.U. or Serviland Gestión Urbanística, S.L.U., at the *servihabitat* URL.

If the whistleblower does not complete the form with the fields configured as mandatory, the Corporate Whistleblowing Channel will not allow them to continue and submit the report.

By completing the form to create their report, the whistleblower may also:

- Record an audio file, which will be encrypted; and/or
- Attach any document related to the events reported.

The reports must be, insofar as it is possible, clear and concise with regard to the events reported.

Furthermore, the whistleblower may choose the option of submitting the report anonymously, without having to provide any kind of information by which they may be identified. However, whistleblowers are encouraged to identify themselves in order that more information can be obtained on the events reported. In any case, for any whistleblower who wishes to identify themselves, the utmost confidentiality of their identity shall be guaranteed.

To send the report, the whistleblower must also **create a secure communication Mailbox**, and set a password by following the instructions provided in the Corporate Whistleblowing Channel.

Once the form has been completed, the mailbox has been opened and the report sent, the whistleblower will be given the identification reference number for their report, which must be kept safe in order to be able to follow up on the aforementioned, as appropriate. It is extremely important that this reference number is kept safe, as without it the whistleblower will not be able to access the file on their report or the secure communication mailbox linked to it.

## 6.2. Accessing and using the secure communication mailbox

The Corporate Whistleblowing Channel provides a secure channel between the whistleblower and the person responsible for managing the report.

To access the mailbox and view the messages sent and received through the Corporate Whistleblowing Channel or to send any further information or communication to the person responsible for managing the report, the whistleblower must go to the **"Secure communication mailbox"** and enter the password that they created upon submitting their report, together with the identification reference number for the report.

## **7 Protection of whistleblowers**

### **7.1 Prohibition of retaliation**

In accordance with the Code of Ethics of the Coral Homes Group, any persons who file any kind of report, pursuant to the stipulations of this Regulation, in good faith and on the basis of reasonable evidence, are protected from any type of retaliation, discrimination, disciplinary measure or penalization resulting from the reports made. Furthermore, Coral Homes Group shall sanction any type of retaliation taken against the whistleblower in good faith.

The prohibition of retaliation stipulated in the previous paragraph shall not prevent any appropriate disciplinary measures from being taken when the internal investigation determines that the report is false and that the person who has made it knew it was false, having acted in bad faith<sup>2</sup>.

To this end, it shall be understood that a report is submitted "in bad faith" when premeditated, malicious or reckless actions are taken.

Where it is considered that there is not enough evidence, or that from the investigation carried out it has not been possible to conclude that any breach has been committed, the aforementioned shall be documented and closed in accordance with the processing stages stipulated in this Regulation. For these reasons, closure does not necessarily imply that the report should be considered as a false report, as this must have been made in bad faith.

### **7.2 Confidentiality regarding the identity of the whistleblower who is identified**

Coral Homes Group guarantees the utmost confidentiality regarding the identity of any whistleblower who wishes to identify themselves.

Furthermore, it is ensured that, in any report submitted in bad faith, the identity of the whistleblower will not be revealed. Notwithstanding the foregoing, it is stated that the administrative or judicial authorities may be provided with this identity, where expressly required as a result of any judicial or administrative proceedings related to the purpose of the communication.

Likewise, all persons who, because of the duties that they carry out in the companies that make up the Coral Homes Group, are aware of the reports that are filed, are under an obligation to keep professional secrecy and the utmost confidentiality regarding the identity of the whistleblower. In this respect, only the persons who are essential in carrying out the relevant investigation shall know the identity of the aforementioned.

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<sup>2</sup> In this respect, it must be remembered that, in accordance with the provisions of article 456 et seq. of the Criminal Code, the accusation, false report and simulation of criminal offences are considered a criminal offence and are punishable by a prison sentence of up to two (2) years.

## **8 Responsibilities and duties in the management of the Corporate Whistleblowing Channel of the Chief Compliance Officers and of the Corporate Compliance Committee**

In accordance with the provisions of the Corporate Compliance Policy, the Corporate Compliance Committee, by means of the Chief Compliance Officers of the companies that make up the Coral Homes Group, is the body responsible for safeguarding the appropriate management and operation of the breach detection mechanisms belonging to the Group, which include the Corporate Whistleblowing Channel.

For its part, the Chief Compliance Officers are responsible, as delegated by this body, for coordinating the management of the reports received in their respective companies, without prejudice to any decisions that must be made by the Corporate Compliance Committee, safeguarding the correct implementation of the appropriate sanctioning measures.

Thus, any time a complaint is received, and before a decision is made by the Chief Compliance Officers, these persons must inform the Corporate Compliance Committee of the analysis carried out on the reports received in order that the aforementioned make a decision in this respect. This excludes any reports whose events are clearly established as a minor breach (minor breach being understood as any event reported which is not established as a potential breach of the internal or external rules, and which does not therefore constitute a criminal offence or an administrative or labour breach).

While managing the Corporate Whistleblowing Channel, Chief Compliance Officers shall at all times act in accordance with the principles, rules of conduct and guarantees provided for in both this Regulation and the Code of Ethics of the Group and also other internal rules, particularly safeguarding compliance with the prohibition of taking or permitting any form of direct or indirect retaliation against the whistleblowers who, in good faith, have submitted a report.

The Chief Compliance Officers and the Corporate Compliance Committee are also responsible for safeguarding the confidential nature of the identity of any whistleblower who chooses to identify themselves upon submitting a report, although this may be revealed to the administrative and judicial authorities insofar as this is required or necessary in order to process the appropriate proceedings.

The Chief Compliance Officers shall also safeguard the processing, instructions and settlement of any reports that are made out by conducting a thorough analysis on any data, information or document submitted, with full independence and impartiality, observing the principles of hearing, contradiction and equality and fully respecting the rights to privacy, to defence and to the presumption of innocence of the investigated persons.

In their Annual Reports, the Corporate Compliance Committee shall include the basic and statistical information regarding the management and operation of the Corporate Whistleblowing Channel in the previous financial year, in all cases safeguarding confidentiality in relation to the identity of the whistleblowers and of any person concerned.

## **9 Special cases in the event of conflicts of interest**

In the event that a report concerned or were made against any of the Chief Compliance Officers, members of the Compliance teams or a member of the Corporate Compliance Committee, this person may not be involved in its processing, investigation or settlement.

It shall be understood that there is a risk of conflict of interest, which shall prevent the person in question from being involved in the processing of a report, in the following cases:

- i. There are family ties with the whistleblower or reported party;
- ii. Is or has been reported by the whistleblower;
- iii. Has a direct interest in the events reported;
- iv. Is part of the area or department concerned by the report;
- v. There is clear enmity with the whistleblower or reported party;
- vi. Is or has been in a situation of hierarchical dependence with regard to the whistleblower or reported party;
- vii. Any other circumstance which prevents any of the Chief Compliance Officers, members of the Compliance teams or a member of the Corporate Compliance Committee from acting independently, impartially and objectively.

The Chief Compliance Officers, members of the Compliance teams and members of the Corporate Compliance Committee undertake to reveal any incompatibility or sign of conflict of interest in connection with a report which has been submitted or is being processed as soon as they become aware of it.

Furthermore, in any cases where it is concluded that there is a conflict of interest, the Chief Compliance Officer, the member of the Compliance teams or of the Corporate Compliance Committee concerned by said conflict must also refrain from accessing any information on the report, its processing, investigation and settlement.

In the case of members of the Compliance teams, any decision on the existence of a situation of conflict of interest and, therefore, of incapacity to be involved in the processing of a report, shall be taken by the Chief Compliance Officer of their company.

Regarding the Chief Compliance Officers and the members of the Corporate Compliance Committee, any decision on the existence of a situation of conflict of interest and, therefore, of incapacity to be involved in the processing of a report, shall be taken by the Corporate Compliance Committee, in accordance with the system for adopting agreements stipulated in their own Regulation. In this case, the member of the Committee allegedly concerned by the conflict of interest shall refrain from being involved in deliberation.

Likewise, any whistleblower, reported party or third party concerned has the right to present cases of incompatibility or of conflict of interest, and these cases must be subject to analysis and judgment on the part of the Corporate Compliance Committee. These cases may either be presented through the Corporate Whistleblowing Channel, the Compliance mailboxes of the companies that make up the Group or directly to the Corporate Compliance Committee itself or to the Chief Compliance Officers.

## 10 Report process procedure

Pursuant to the stipulations of section 8 above, the Chief Compliance Officers of the companies that make up the Coral Homes Group shall be responsible for the management of the Corporate Whistleblowing Channel and shall process the reports in accordance with the following stages which are set out below.

Notwithstanding the foregoing, every Chief Compliance Officer shall appoint, from among the members of their Compliance team, a report manager and instructor (the "**Instructor**") for their company on a yearly basis, and shall inform the Corporate Compliance Committee of their appointment.

Notwithstanding the foregoing, the Corporate Compliance Committee may agree to appoint a different Instructor in any cases of reports which it deems relevant. Likewise, the Corporate Compliance Committee is authorised to appoint an external Instructor for the management and processing of reports where it considers this advisable.

### Previous stage: Acknowledgement of receipt of the report

The Instructor of the company of the Group receiving a report shall send an acknowledgement of receipt of the report to the whistleblower through the secure communication mailbox which has been enabled by the Corporate Whistleblowing Channel tool within no more than **seven (7) calendar days** from the date on which the report is received, unless this compromises the confidentiality of the report.

### Stage 1: Report process procedure and communication to the whistleblower/reported party

The Instructor shall be responsible for conducting a preliminary analysis on the events reported and shall submit this to their Chief Compliance Officer, who will decide whether each report shall be accepted or not accepted, as applicable.

- i. **Non-acceptance of the report for processing:** in the event that the report does not fulfil the requirements stipulated in this Regulation (for not having been submitted through the Corporate Whistleblowing Channel, submitted to a company which is not related to the report or for reporting events which clearly do not constitute a breach as provided for in the objective scope of the Corporate Whistleblowing Channel), the Chief Compliance Officer may decide not to accept the report. In this case, the aforementioned must inform the whistleblower of this matter by means of a justified decision, within no more than **fifteen (15) calendar days** from the date on which the report is received through the secure communication mailbox of the Corporate Whistleblowing Channel or via the same means through which the report was submitted, if this was not done through the aforementioned channel.

Nevertheless, where possible, the Instructor shall request, through the secure communication mailbox or via the same means through which the report was submitted, that the unfulfilled requirement be remedied.

Unaccepted reports shall be anonymized in accordance with the rules in force.

- ii. **Acceptance of the report for processing and start of the instruction and investigation stage:** when the filed report fulfils the requirements stipulated in this Regulation, the Chief Compliance Officers shall inform the Corporate Compliance Committee of this, who, where appropriate, shall decide on whether it should be accepted for processing.

Consequently, this first stage shall end with one of these options: non-acceptance, remedy request or acceptance of the reports. If the outcome is acceptance, this shall be communicated to the whistleblower,

provided that this does not compromise the confidentiality of the report. In any case, the decision made shall be recorded in writing with the reasons that justify it.

The decision of acceptance or, where appropriate, of the need to remedy the report submitted shall be communicated to the whistleblower within no more than **fifteen (15) calendar days** from the date on which the report is received through the secure communication mailbox of the Corporate Whistleblowing Channel or via the same means through which the report was submitted, if this was not done through the aforementioned channel.

Likewise, any person who has been subject to a report, whenever this is accepted, shall be informed of the following by the Instructor: (i) the report having been received; (ii) the event of which they are accused; (iii) the departments and third parties which, where appropriate, may be recipients of the report; and (iv) how to exercise their privacy rights in accordance with the data protection rules.

As an exception, in the event that the Chief Compliance Officers believe that notifying the reported party may risk compromising the investigation, this communication may be postponed until the aforementioned risk disappears. In any case, the reported party must be informed within no more than one (1) month from the date on which the acknowledgement of receipt of the report was issued or, if no acknowledgement of receipt was sent to the whistleblower, the reported party must be informed within one (1) month from the expiry of the seven (7)-day period after the report was submitted, with the possibility to extend this deadline to a maximum of three (3) months where there are justified reasons for doing so.

## **Stage 2: Opening of the File and start of investigation: collection of information and documentation**

Once the report has been accepted for processing, and under the identification reference number assigned by the Corporate Whistleblowing Channel tool, as soon as the report is submitted, the Investigation File is opened.

At this time, the Instructor shall begin the appropriate investigation proceedings in order to establish the truthfulness of the events reported, in accordance with the following rules and protecting the rights of the parties in all cases:

- i. **Proportionality:** the collection of data and information throughout the course of the investigation of a report (including personal data) shall be executed in accordance with this principle. This means that (i) collection of data shall be restricted to those which are strictly and objectively necessary in order to process the reports and the reality of the events reported; (ii) data shall be processed, at all times, pursuant to the applicable data protection rules, for legitimate and specific purposes related to the investigation which may arise as a result of the report and shall not be used for any incompatible purposes; and (iii) data shall be appropriate and not excessive in relation to the purposes stipulated.
- ii. **Right to an impartial instructor:** this is one of the rights which assists the reported party in the sense of being investigated in accordance with the principles of equality, independence and honesty.
- iii. **Equality between the parties:** consists of preventing unfair situations of privilege for one of the parties (whistleblower or reported party) to the detriment of the other.
- iv. **Right of defence:** guarantee of the reported party which allows them, where appropriate, to request and provide evidence, as well as to refute any which is filed against them, in order to detract from the charges brought against them.
- v. **Right of contradiction:** understood as the recognition of the right of the parties (whistleblower and reported party) in order to assert their claims in terms of examining evidence, as well as the right to be heard prior to the proposal of the disciplinary measures to be implemented, where appropriate.
- vi. **Right to privacy:** throughout the investigation, the right of all persons who are involved in it to their personal data and private information being processed confidentially shall be respected.



- vii. **Right to the presumption of innocence of the investigated persons:** every person is presumed innocent and shall be treated as such for the whole time that the Investigation Report is being processed, provided that they are not proven to be responsible for the events reported.

The Instructor shall conduct any enquiry proceedings that they deem necessary in order to confirm the truthfulness and reality of the conduct reported, counting, in any case, with the collaboration of the Chief Compliance Officer, the Corporate Compliance Committee, where appropriate, and with members of other departments and Third Parties, which due to their position or closeness to the events reported, may be relevant in clarifying the aforementioned.

To this end, all information and professional documentation related to the events shall be collected first of all. In order to do so, the Instructor may access, with the guarantees which are necessary in each case with regard to the validity of the evidence, professional e-mails, corporate files, professional income and expenditure records, records of professional expenses and trips and back-up files of the professional computers concerned, as well as any other information of a professional nature which is necessary for the investigation of the events, in accordance with the stipulations of the Code of Ethics of the Coral Homes Group.

In the event that access is required to any professional e-mails, telephone calls of a professional nature, internet history of a corporate computer or back-up files of the professional computers concerned, the Instructor shall inform the Chief Compliance Officer of this necessity in order that the aforementioned make the appropriate request to the CISO or to the systems director of the company of the Group which receives the report. Access must be adequately motivated and have enough evidence to justify it, also including the proportionality assessment and use of alternative or less invasive measures.

In the process of collecting information and documentation related to the events, the Chief Compliance Officer and the Instructor shall guarantee, at all times, observance of the data protection rules, of the Workers' Statute and of the Collective Agreements which are applicable.

In view of the circumstances of the case and in accordance with the seriousness of the events which are investigated, the Instructor may suggest initiating testimony proceedings, in which at least one (1) member of the workers' representative body or, otherwise, two (2) employees not concerned by the investigation process shall be called, in all cases guaranteeing that there is no conflict of interest on the part of the aforementioned. Any persons who act as witnesses shall be present at the investigation proceedings in order to give evidence on observance of the guarantees during the process of collecting and analysing information.

### Stage 3: Execution of the investigation proceedings

Once the Instructor has the documentation and information that they have deemed necessary to collect, in collaboration with the Chief Compliance Officer, the aforementioned shall initiate hearing proceedings with all concerned parties and witnesses and shall execute as many additional investigation proceedings as they consider necessary. All Personnel shall be under an obligation to loyally collaborate in the investigation and keep its content a secret. The intervention of witnesses and concerned parties shall be of a strictly confidential nature, particularly regarding the data of any whistleblower who has been identified.

Before entering into hearing proceedings with the whistleblower, where appropriate, and with the witnesses, the Instructor shall send them formal notification of the interview in advance, summoning them on a set date and in a set place in the registered office or by means of videoconference. In the event that the interview were to be recorded, the appropriate data protection measures shall be implemented.

While the interviews are being carried out, the guidelines stated below should be followed:



- Before the interview, the Instructor must (i) draw up a plan of the persons to be interviewed and the order in which this will be done; (ii) collect any documentation required for the interview; and (iii) prepare a script for the interview.
- At the start of the interview, the Instructor must inform the interviewed person in writing (i) of the purpose of the investigation and of the interview; (ii) of their rights; (iii) that, in accordance with this Regulation, Coral Homes Group shall not permit any retaliation to be taken for information which may be provided during the interview and (iv) of the confidential nature of the interview.
- During the interview, the Instructor shall try to start with open-ended questions in order to subsequently pose closed-ended questions which allow them to find out information.
- At the end of the interview, the Instructor shall ask if there is any additional matter that concerns them or that is significant and has not been discussed throughout the course of the interview. Subsequently, the interviewed person shall be asked to thoroughly read their witness statement and, if they agree with its content, to sign it. In the event that the aforementioned does not express their acceptance of the content of the statement, they must sign a document stating their disagreement, the content with which they do not agree and, where appropriate, the reason for their disagreement.

The hearing proceedings shall include, at least and where possible, a private interview with the person supposedly responsible for the conduct reported in which, pursuant to the guarantee of presumption of innocence, they shall be informed of the events subject to the file and shall be asked to provide their full version of events. Furthermore, the aforementioned shall be allowed to provide appropriate evidence and shall be asked relevant questions depending on the circumstances of the case and the events reported. Likewise, all the parties concerned shall be informed about the processing of their personal data, and any other duty required by the legislation on protection of personal data and, where appropriate, of an employment nature with regard to the presence of a representative member of the workers shall be observed.

The rights to privacy, to defence and to the presumption of innocence of the investigated persons shall be guaranteed throughout the investigation.

The Instructor, directly or through their Chief Compliance Officer, may at any time during the procedure, ask for the advice and collaboration of personnel from the Senior Management of their company and/or from external and independent advisers, in order to determine the outcome and form of action in relation to any report.

#### **Stage 4: Issuing of internal investigation Report and Decision Proposal**

The instruction of the Investigation File shall end with an Internal Investigation Report being issued by the Instructor, which shall be submitted to their Chief Compliance Officer (where this person has not been appointed as the Instructor) together with a Decision Proposal.

The Decision Proposal shall be delivered about any of the following alternative decisions:

- a) the existence of a breach shall be decided with justification;
- b) the non-existence of a breach shall be decided with justification; or
- c) the execution of additional proceedings which are necessary in order to be able to determine if there has been a breach or not shall be agreed.

If at the time when the Decision Proposal has been issued, the maximum timeframe of two (2) months has been exceeded for the investigation stage, the Instructor shall include the need to introduce the appropriate extension in the aforementioned Decision Proposal, respecting, at all times, the deadline of **three (3) months**

from the acknowledgement of receipt sent to the whistleblower or, if no acknowledgement of receipt was sent to the whistleblower, three (3) months from the expiry of the seven (7)-day period after the report was submitted. Only in cases which are particularly complex and require a longer timeframe, this may be extended by up to a maximum of another three (3) additional months.

The Chief Compliance Officer shall review the Report and make a decision on the Decision Proposal, being able to make, with justification, any other decision different from the Instructor's proposal, where deemed appropriate, and shall submit the Report together with the Decision Proposal to the Corporate Compliance Committee.

### **Stage 5: Termination of the Investigation: Closure or proposal for measures to implement. Record**

Once the investigation has come to an end, the Corporate Compliance Committee, in view of the Report and of the Decision Proposal, shall take one of the following decisions:

#### **a) Closure of the report**

The Corporate Compliance Committee shall agree on the closing of the report and of the actions taken when, following the relevant investigation, it considers that there has not been enough evidence regarding the events reported, or that these events do not constitute any breach in line with the objective scope of the Corporate Whistleblowing Channel.

#### **b) Proposal for measures to implement**

When there has been enough evidence regarding the events reported and, furthermore, these constitute a breach in line with the objective scope of the Corporate Whistleblowing Channel, the Corporate Compliance Committee shall:

- i. Draft a decision proposal in writing, which is duly justified, for the possible measures to implement.
- ii. Send the report (subject to due anonymization, where applicable), the documented outcome of the investigation and the sanction proposal:
  - o to the department with human resources management and control functions which is responsible for implementing specific disciplinary measures against Personnel;
  - o to the department responsible for coordinating relationships with Third Parties;
  - o to the department responsible for processing the judicial/administrative proceedings which, where appropriate, are right and proper.<sup>3</sup>

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<sup>3</sup> In the event that the Corporate Compliance Committee were to come to the conclusion that the conduct or the events brought to light through a report are liable to be described as a criminal, administrative or labour crime, Coral Homes Group reserves the power to provide the competent authorities with all the information which it may be obliged to do, including the identity of the persons involved.

Furthermore, a deadline of **three (3) months** from the date on which the acknowledgement of receipt of the report is sent or, if no acknowledgement of receipt was sent to the whistleblower, three (3) months from the expiry of the seven (7)-day period after the report was submitted, or, where applicable, after three (3) additional months, feedback shall be given to the whistleblower with the grounds for the decision and, where appropriate, the aforementioned shall be told that the relevant measures will be implemented.

## Record

By means of the Corporate Whistleblowing Channel tool, Coral Homes Group shall keep a record of all the reports received and of the internal investigations that they have given rise to, guaranteeing, in all cases, the necessary confidentiality requirements.

This record is not of a public nature and its content may only be accessed by persons who are duly authorised to do so by the Chief Compliance Officers of the companies that make up the Coral Homes Group, as well as any competent authorities that request access, guaranteeing, in all cases, confidentiality in accordance with the rules in force.

## **11 Protection of personal data**

The Corporate Whistleblowing Channel fully complies with the applicable data protection rules; particularly with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, "General Data Protection Regulation" or "GDPR") and with its implementing rules, both in Europe and in Spain, and particularly with Organic Law 3/2018, of 5 December, on Protection of Personal Data ("Organic Law on Protection of Personal Data and Guarantee of Digital Rights").

Likewise, and without yet being transposed, Coral Homes Group has also taken Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law into consideration.

Furthermore, in compliance with the duty of disclosure which falls on the Controllers of personal data and the commitment to due diligence, Coral Homes Group makes the Privacy Policy of the Corporate Whistleblowing Channel available to the whistleblowers and to any other interested party. This Policy may be consulted at the web pages: <https://coralhomes.integrityline.com/> and <https://servihabitat.integrityline.com/> (can be viewed by all users at the top of the web page). In accordance with art. 13 of the GDPR and art. 11 of the Organic Law on Protection of Personal Data and Guarantee of Digital Rights, the aforementioned Policy sets out detailed information on the processing of personal data in the framework of the Corporate Whistleblowing Channel.

## **12 Advertising and Dissemination**

In order to provide information on the use of the Corporate Whistleblowing Channel, this Regulation shall be published on the web portals of the companies that make up the Coral Homes Group, as well as on the intranet of Servihabitat.

Likewise, Coral Homes Group shall take any actions necessary in order to encourage Personnel to use the Corporate Whistleblowing Channel.

### **13 Approval, Follow-up and Review**

This Regulation has been approved by the Corporate Compliance Committee on 17 November 2022.

It shall enter into force once it has been approved by the Corporate Compliance Committee, although it shall be submitted to the Board of Directors of Coral Homes Holdco, S.L.U. for ratification.

In order to guarantee the effectiveness of this Regulation, it shall be submitted for periodic reviewing and updating.

All amendments, regardless of the nature, which are made to the aforementioned must be submitted for the approval of the Corporate Compliance Committee, although they must only be ratified by the Board of Directors of Coral Homes Holdco, S.L.U. when amendments are significant.

In any case, an amendment shall be understood to be significant when it may affect the fulfilment of the provisions of the applicable rules.

## **ANNEX I: Conduct considered in the Criminal Code and criminal offences stipulated in other special laws**

Conduct that may be reported through the Corporate Whistleblowing Channel of the Group includes any **breach of the principles and rules of conduct stipulated in its Code of Ethics** and additional rules.

Furthermore, any conduct may also be reported which is considered in the Criminal Code and criminal offences stipulated in other special laws, liable to generate criminal liability for the Group, such as:

**Bribery:** Offering or giving civil servants, authorities, bodies and public administrations a gift or compensation, of a financial or any other nature, with the intention of obtaining a benefit for the Group or any of the companies that make it up, irrespective of whether it is lawful or unlawful.

**Influence peddling:** Influencing and taking advantage of any situation derived from a personal relationship, in order to reach a decision, that may directly or indirectly generate a financial profit for the Group or any of the companies that make it up.

**Corruption in business:** When a director, manager, employee or collaborator, of the Group itself or through an intermediary party, receives, requests or accepts a benefit or advantage of any nature which is not justified, for themselves or for a third party, as compensation to unduly favour another party in the acquisition or sale of goods, or in the hiring of services or in commercial relations. To the contrary, the promise or granting of the benefit to a third party for the acquisition or sale of products in commercial relations.

**Corruption in international transactions:** Offering or giving an undue benefit or advantage to civil servants in order to obtain favourable treatment in the carrying out of international financial activities.

**Swindle:** Deceiving another, for profit, in order that the aforementioned carry out an act of disposition which is detrimental to themselves or to a third party.

**Misleading advertising:** Making offers or advertising products or services, where false declarations are made or vague characteristics are shown of the aforementioned, in such a way that may cause serious and clear harm to consumers.

**Revelation and disclosure of company secrets:** Using any means to take possession of data, physical documents or electronic documents, computer mediums or other objects that constitute confidential information of another company, entity or that of the Group or any of the companies that make it up, etc. in order to use, disseminate, disclose or transfer the aforementioned.

**Subsidy fraud:** Obtaining subsidies or aid from Public Administration for an amount or value of over 120,000 euros, falsifying the conditions required for this to be granted and hiding any which had prevented the amount from being granted.

**Treasury fraud:** Defrauding the Treasury (at a national, autonomous, regional or local level) for an amount exceeding 120,000 euros; avoiding the payment of taxes, amounts deducted or which must have been deducted or income credited to compensation in kind, unduly obtaining refunds or enjoying tax benefits in the same way. Breaches of a fiscal nature for an amount of under 120,000 euros may also be reported.

**Social Security fraud:** Avoiding the payment of Social Security contributions, unduly obtaining refunds or enjoying deductions in an undue way.

**Breach and falseness of accounting obligations:** Seriously breaching the obligation of keeping commercial accounting and accounting books and/or records. This represents a type of criminal act which tends to go hand in hand with other fraudulent conduct, as this tends to be carried out by means of double-entry book-keeping and false account entries.

**Criminal offences against natural resources and the environment:** Causing or carrying out, either directly or indirectly, emissions, dumping, radiation, extraction, excavation, grounding, noise, vibrations, injections or deposits, in the atmosphere, the ground, underground or in inland or maritime waters or groundwater; establishing dumps or landfills for rubbish or solid or liquid waste which is toxic or harmful and which may be seriously detrimental to the balance of natural systems or to human health.

**Frustrated enforcement:** Carrying out any act of asset disposition or which generates obligations, hindering or preventing any seizure or procedure from being carried out to claim an amount. Hiding assets in judicial or administrative enforcement proceedings. Using the depository of assets seized by the authority without authorisation.

**Punishable insolvency:** In the event that the company were to find itself in bankruptcy, this criminal offence would be committed when an act of asset disposition is carried out in order to unduly reduce the assets which guarantee the fulfilment of the obligations, or to make it difficult or impossible for the creditor to know the true financial situation of the debtor.

**Criminal offences against Intellectual Property:** Reproducing, plagiarizing or publicly communicating, in whole or in part, work of a literary nature (books) artistic nature (paintings or photographs) or scientific nature (specific theories, computer applications or programs), or transforming, interpreting or artistically performing this work established on any type of medium or communicated through any medium, without authorisation from the owners. For example, this criminal offence is applicable to any cases in which computer applications or programs are used without the appropriate user licence.

**Criminal offences against Industrial Property:** Reproducing, imitating, etc. a distinctive sign without the consent of the owner, so that another sign is obtained which is identical or can be confused with the original sign, in order to distinguish the same or similar products, services, activities or establishments.

**Computer damage:** Erasing, damaging, spoiling, deleting or rendering inaccessible any external data, computer programs or electronic documents, without authorisation and when the outcome is serious. Obstructing or hindering the operation of external computer systems.

**Town-planning criminal offences:** Carrying out development, construction or building work which may not be authorised on land set aside for roads, green areas, public property or places whose landscape, ecological, artistic, historic or cultural value is recognised, through law or administration, or which have been considered to be under special protection for the aforementioned reasons.

**Criminal offences against personal and family privacy:** Taking possession of, using or modifying, without authorisation and to the detriment of third parties, confidential data of a personal or family nature of another which are recorded in computer, electronic or telematic files or mediums or in any other public or private file or register. Unlawfully accessing a computer system in order to take possession of personal data contained in the aforementioned.

**Against the rights of foreign citizens:** Promoting, favouring or facilitating illegal trafficking or illegal immigration.



**Money Laundering:** Accepting funds, deposits, etc. which originate from a criminal offence being committed, or taking any other action to hide this unlawful origin, or in order to help any person who has been involved in the breach. This may be committed recklessly when acting without due diligence, in other words, the perpetrator does not have to want the criminal offence be committed or be aware of it.

**Terrorist financing:** Providing, collecting or accepting funds with the intention of these being used to commit criminal offences related to terrorist organisations and groups.

**Criminal offences against public health:** Offering products on the market which are harmful to health and/or which do not meet the expiration or composition requirements stipulated by laws or regulations. Also producing substances which are harmful to health, shipping them, supplying them or trading with them.

**Criminal offences against workers' rights:** Seriously endangering the lives, health and safety of workers as a result of breaching the occupational risk prevention rules. This criminal offence may be committed recklessly. Using deception or abuse in a situation of need to impose working or Social Security conditions on workers that damage, abolish or restrict their rights. Imposing working conditions which are inappropriate or contrary to occupational health and safety; treating workers in conditions of inequality and discrimination; blocking or limiting the right to freedom of association.

**Stock market criminal offences:** Using or supplying any relevant information for the quotation of any kind of financial instrument. Spreading news or rumours about persons or companies, knowing that they are false, in order to change or maintain the price of the quotation of a financial value or instrument. Falsifying the economic and financial information contained in the issue prospectuses of any financial instruments.

**Handling of toxic, corrosive and other substances:** Contravening the safety rules stipulated with respect to the manufacturing, handling, transport, possession or selling of explosives, inflammable or corrosive, toxic and asphyxiating substances, specifically endangering the lives, physical integrity or health of persons or the environment.

**Falsification of credit cards, debit cards and traveller's cheques:** Modifying, copying, reproducing or falsifying credit cards, debit cards and traveller's cheques.

**Illegal funding of political parties:** Giving donations or contributions to a political party, federation, coalition or a group of electors in a way which is illegal.

**Fraudulent invoicing:** Modifying or manipulating the automatic systems that measure the cost of products sold or services offered (meters, taximeters, etc.) in order to invoice higher amounts, causing harm to the consumer.

**Prostitution and corruption of minors:** Forcing a person of legal age to take part in or be supported by prostitution, using violence, intimidation or deception, or taking advantage of a situation of superiority, need or vulnerability. Inducing, encouraging, favouring or facilitating the prostitution of a minor or a person with disabilities who requires special protection, or making money from the aforementioned, or exploiting a minor or a person with disabilities for this purpose in any other way. Requesting, accepting or obtaining, in exchange for remuneration or a promise, sexual relations with a minor or a person with disabilities who requires special protection. The production, selling, distribution, etc. of child pornography.

**Modification of prices in tenders and public auctions:** Requesting any benefit in order to not take part in a tender or public auction, attempting to keep bidders away from the aforementioned by means of threats,

gifts, promises or any other artifice, making an agreement with another bidder in order to modify the price of the auction, or fraudulently leaving an auction once the tender has been accepted.

**Embezzlement:** Using or managing public money in a fraudulent way.

**Piracy of broadcasting or interactive services:** Accessing or facilitating access (without the permission of the service provider) to a sound or television broadcasting service or to interactive services provided remotely by electronic means. Modifying or duplicating the identification number of telecommunications equipment, or selling equipment which has been modified in a fraudulent way. Using equipment or programs which permit unauthorised access to conditional access services or telecommunications equipment.

**Obstruction to inspection activity:** Refusing to collaborate with the inspection authorities regarding any companies subject to or which operate in markets subject to administrative oversight.

**Coercion:** Using violence to prevent another from doing what is not prohibited by law or compelling them to do something that they do not want to do, irrespective of whether this is fair or unfair, in order to prevent the legitimate enjoyment of a home.

**Breaking and entering:** Entering or staying in another person's dwelling against the will of the inhabitant. Likewise, entering or staying at the address of a legal entity, professional study, office, establishment or premises open to the public against the will of the owner outside opening times.

**Corporate criminal offences:** Any managers who falsify annual accounts or other instruments that must reflect the legal or financial situation of the company are punished de facto and de jure.

Furthermore, the introduction of any abusive agreements taking advantage of a majority situation in a board of shareholders or governing body, the introduction of a harmful agreement adopted by a fictitious majority and the refusal or blocking of rights to information, participation in the management or control of the corporate activity or preemptive subscription of shares for associates is punished.

**Criminal offences of torture and criminal offences against moral integrity:** Inflicting degrading treatment on another person which damages their moral integrity, which may also be committed in the scope of any work-based or administrative relationship and taking advantage of their relationship of superiority, repeatedly taking hostile or humiliating action against another person which, without constituting degrading treatment, represents serious harassment against the victim.

**Criminal offences of sexual harassment:** Requesting favours of a sexual nature, for themselves or for a third party, in the scope of a work-related, teaching or service-provision relationship or similar, which is continuous or regular, with this behaviour giving rise to an objective and seriously intimidating, hostile or humiliating situation for the victim.