



## Internal Information System Policy Ethical Channel

<b>Document</b>	Internal Information System Policy – Ethical Channel
<b>Description</b>	Definition of functioning of Internal Information System (Ethical Channel)
<b>Start date</b>	June 2023
<b>Object</b>	To establish the rules for the functioning of the Internal Information System (Ethical Channel)
<b>Classification</b>	Public document

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## **1. OBJECT, SCOPE AND GUIDING PRINCIPLES**

### **1.1. Object and mission**

The object of this Policy is to explain to all users of the Internal Information System (“IIS” or “Ethical Channel”) of the la Fundació Institut de Bioenginyeria de Catalunya (“IBEC”) how it works, how they can access it and what its features are. In other words, its main operational principles as well as those governing the defence of both reporting and reported persons.

The Ethical Channel is a tool that can be used by all IBEC members (its governing body, managers and workers), as well as third parties, to make it aware of the possible commission of criminal or serious or very serious administrative offences of which they become aware (these can be described as complainants, whistleblowers or reporting persons).

The aforementioned third parties, i.e. those also permitted to submit a report, must include at the very least participants and members of the Board of Trustees (including non-executive members), freelancers, anyone working for or under the supervision of contractors, subcontractors and suppliers, former workers, interns, recruitment process candidates or those at the pre-contractual negotiation stage, volunteers and IBEC workers undergoing training. Nevertheless, please note that, although the IBEC will contemplate all the guarantees included in this Policy, current regulations only establish protection measures for those linked or formerly linked through an employment or professional relationship with the IBEC and with regard to those matters contained in Section 1.2 (a and b) and following hereof.

The Board of Trustees seeks to create a mechanism to, among other things, guarantee compliance with the law and the effectiveness of the Foundation’s Code of Ethics and Good Practices and of the IBEC’s internal protocols, thereby ensuring that they do not remain empty declarations of will and enforcing a zero-tolerance policy with regard to unlawfulness.

Furthermore, the use of this Channel should help the IBEC to ensure its activities are in line with applicable legislation, guarantee compliance with its internal regulations and reduce the risk of the committing of criminal or unlawful activities at its facilities, thereby protecting not only the Institute itself but also its employees and representatives.

The IBEC Board of Trustees shall be responsible for implementing the Ethical Channel, after consulting with the legal representatives of workers, if existing. It shall also be responsible for appointing, removing or dismissing the Responsible of the Internal Information System (the “Responsible”), who must be one or more people with sufficient training and knowledge to assume said function (the System must guarantee that reports are dealt with effectively). The Responsible shall be a collegiate body, must be independent and autonomous with regard to the other members of the Institute and may not receive instructions of any kind in the exercising of its duties. As a collegiate body, it shall designate the subjects who are to receive the reports and, depending upon the content of the latter, shall designate with each of them the person responsible for their internal investigation.

The IBEC shall furnish it with any human and material resources it may require for the carrying on of its duties. Once the Responsible, in whatever format it may take, has been

appointed, the fact must be notified to the Anti-Fraud Office of Catalonia in its capacity as the Catalan Independent Whistleblower Protection Authority.

It shall be the responsibility of the Responsible to receive and process all reports submitted via the Ethical Channel, to comply with the provisions of this Policy (and any others that may be required by law) and to review compliance with the Procedure on Managing Communications Received, whilst respecting the rights and duties of the parties involved in the IIS.

## 1.2. Scope and compulsory nature

### **Objective scope. What can and cannot be reported via the Ethical Channel?**

The Ethical Channel can be used to make complaints or provide information or alerts (“reports”), without distinction, regarding acts or omissions arising or that have arisen within the scope of the IBEC’s activities and that constitutes an infringement, in an employment-related or professional context, of a rule or principle applicable to it. Complaints can be made, for example, regarding the following:

- a) Conduct constituting a criminal or a serious or very serious administrative offence, such as fraud, the payment of an unearned commission, non-payment of taxes or price fixing in a public tender.
- b) Any action or omission of European Union law, provided that:
  - i. It involves public procurement, financial services, products and markets, and prevention of money laundering and terrorist financing, product safety and compliance, transport safety, protection of the environment, radiation protection and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, protection of privacy and personal data, and security of network and information systems.
  - ii. It affects the financial interests of the European Union.
  - iii. It impacts the internal market, including breaches of Union competition and State aid rules.
- c) The infringement of any rule or regulation that must be observed by the IBEC.

No incident not included in this section shall be regarded as reportable via the IIS, including matters closely related to Human Resources policies or personal matters (e.g. vacations, pay, relations between workers and interpersonal conflicts), nor shall recommendations or suggestions unrelated to regulatory compliance matters or the provision of Institute services.

Should a potential reporting person be in any doubt regarding the nature of an incident or behaviour, provided that they are acting in good faith, they may make a complaint via the Ethical Channel without any problem. The Responsible shall review the content and analyse its admissibility, providing the reporting person with notice of this fact. All manner of information that may be received via the IIS will be processed and dealt with via the applicable procedure.

### **Concerns**

In the case of any concerns on the part of the addressees of this Policy regarding regulatory compliance or around the use of the Ethical Channel itself (e.g. how to interpret a rule or how

to act in a given case), they may write to [infocanaletico@ibecbarcelona.eu](mailto:infocanaletico@ibecbarcelona.eu), without being entitled, in any case, to use this email address to make an actual report.

### **Subjective scope. Who is this Policy aimed at?**

This Policy is aimed at anyone who in any way provides services of an employment-based or professional nature to the IBEC. In other words, participants or members of its Board of Trustees, senior management or oversight team, including non-executive members, workers and habitual outside partners (as defined in Section 1.1), as well as anyone who may act for or on behalf of the IBEC and third-parties, with no geographical limitations. The Policy shall also be applicable (i) for all of them, whether reporting or reported person or witness, and (ii) for the Responsible as the body responsible for receiving and/or processing any reports that may be submitted via the Ethical Channel.

### **Compulsory nature**

Compliance with this Policy is an employment or contractual obligation for all of them (except for thirds parties with no link to the IBEC), such that non-observance thereof may give rise to disciplinary measures pursuant to the provisions of the labour rules and regulations applicable to the IBEC's activities (e.g. collective bargaining agreements), as well as of the relevant regulations or contractual document.

All addressees of this Policy, except for the aforementioned third parties, have an obligation to report any reportable incident(s) or behaviour of which they become aware, using the methods set forth in the following section.

### **1.3. Applicable laws and regulations**

The organisation, use and functioning of the Ethical Channel shall be governed by this Policy and, on an ancillary basis, by the Procedure for Managing Informations Received.

Additionally, any rules or regulations that may be issued by the authorities or public administrations with regard to internal or external reporting channels, or other norms that may govern aspects related thereto (e.g. laws on data protection and, particularly, all those governing the protection of fundamental rights) shall be observed.

In any case, if the incident(s)/behaviour reported involve a matter covered by a specific IBEC internal procedure, the provisions of said procedure shall be followed (e.g. the IBEC's Protocol for action in cases of harassment).

### **1.4. Guiding principles**

The present Policy is a result of, among other reasons, the IBEC Board of Trustees' wish to establish a zero-tolerance attitude towards criminal and administrative offences and unlawfulness in general, as well as to foster respect for the law and good practices.

In line with the above, this set of rules governing the obligation to report incident(s)/behaviour to the Responsible and their management shall always respect the principles of *freedom, independence and impartiality, confidentiality, indemnity, protection and prohibition of reprisals, integration and trust*. More specifically:

**a) Freedom:** All the addressees of this Policy may, pursuant to Section 2, access it and its procedures, as well as the Ethical Channel, freely.

**b) Independence and impartiality:** The Responsible, as the IBEC body charged with receiving and managing any reports made via the Ethical Channel, shall, in carrying out said functions, always act with respect for the principles of independence and impartiality, and always objectively respecting the rights and guarantees available to all the parties involved.

**c) Confidentiality:** Any information received via the Ethical Channel shall always be treated as strictly confidential. In other words, the Responsible shall never disclose: (i) the name of good-faith reporting persons, nor any data or information upon whose basis their identity may directly or indirectly be deduced; (ii) the identity of any other person identified in the report during the investigation stage; (iii) the report itself, and shall prevent any action likely to disclose the aforementioned points.

The Responsible may nevertheless disclose information associated with the report in the following cases:

- To other IBEC Units when necessary for the purposes of the investigation, something that shall be established at the beginning thereof to identify the persons given access to report-related information. Access to information may also be granted to other departments during the course of the investigation when required, as the investigation progresses.
- To third parties, when it is necessary to contract their services for the proper progress of the investigation (e.g. lawyers, advisers, experts and detectives) or to other organisations involved, something that shall be established over the course of the investigation. In such cases, a confidentiality undertaking shall be required of said third party.
- To the IBEC Board of Trustees when deemed necessary in light of the potential gravity of the incident(s)/behaviour.
- When there is a legal obligation or judicial order to do so.
- To the Human Resources Unit, after the investigation is complete and an affirmative conclusion as to its possible perpetration and responsibility is reached. This shall be done so that it may impose, where applicable, the relevant punitive measures against the reported and responsible person. Said Unit may also be provided access when the adoption of precautionary measures against a worker is required at the initial stages of the procedure.
- To other IBEC Units or committees, once investigations are concluded, to coordinate therewith in the implementation of improvements in IBEC processes when recommended in the final findings report.

In all the above cases, a declaration of confidentiality must be demanded and the identity of the affected persons (and particularly the reporting person) must never be disclosed when known, nor shall the report itself be provided. Additionally, the data protection obligations set forth in Section 7 hereto shall also be complied with.

Exceptions to protecting the identity of the reporting person may be made in the following cases:

- When special circumstances arise that make their identification advisable, provided that they provide their consent therefor.
- In the case of express requirement by the authorities or judicial bodies and, in particular, to safeguard the reported person's right to a defence.  
Should this case of disclosure of the reporting person's identity arise, they shall be informed in advance, except when this may compromise the investigation or judicial proceedings or when prohibited by a legal instrument with the status of a law (e.g. Spain's Law on the prevention of money laundering).  
In any case, this transfer of data shall comply with any applicable personal data protection legislation.

This protection of the confidentiality of the reporting person shall not be applicable when they themselves intentionally disclose their identity within the context of a public disclosure.

**d) Indemnity, protection and prohibition of reprisals:** No good-faith reporting person may, as the result of making a report, suffer from any form of reprisal or attempted reprisal by the IBEC. The IBEC itself shall take special care to ensure that no good-faith reporting person suffers any kind of negative consequence from the submission of a complaint (e.g. suspension from work, dismissal or termination, demotion or refusal of promotion, etc.).

The IBEC shall ensure that none of its members carries out any act that may entail a reprisal against a reporting person. This guarantee shall also encompass witnesses and/or third parties (including facilitators, defined as those who may assist the reporting person in formulating a report and any workers' legal representatives who may advise or support them) and legal persons that assist or are related with the investigation of the incident(s) reported.

Good faith shall be deemed lacking in reporting persons when they are aware of the falsehood of the incidents/behaviour reported or when they act with disregard for the truth.

Factors assessable as indicating the absence of good faith include a desire for revenge, harassment of the reported person and attempts to damage their good name or undermine their work or professional reputation.

Irrespective of any criminal and/or civil responsibilities that may arise from such actions, bad-faith reporting persons shall face disciplinary or contractual sanction, where possible, pursuant to applicable employment and contract law. Incidents reported by mistake shall not be sanctionable provided that this has been done in good faith.

**e) Integration:** The IBEC shall integrate its different channels in to a single one to improve management thereof, without prejudice to the individual elements to be observed in the management of each.

**f) Trust:** The IBEC shall create trust in the use of the Channel for all its members such that it becomes as effective as possible.

## **2. REPORT SUBMISSION: How to submit a report**

### **2.1. Methods of submitting reports**

The recipients of this Policy can make the complaints mentioned in point 1.2 above through the Co-resol website <https://co-resol.bcnresol.com/webclick> or through the application (available for Android and iOS). You can find access to it <https://ibecbarcelona.eu/ca/canal-etic>

If the reporting person so requests, they may also submit their report at a face-to-face meeting with the Responsible within a maximum of seven days of so requesting. In this case, and with the reporting person's prior authorisation, minutes shall be taken to place on record the incident(s)/behaviour reported. The reporting person shall be offered the opportunity to review and, if necessary, amend or expand upon, the information set forth therein.

For the purposes of ensuring Channel confidentiality, access to reports submitted shall only be given to the Responsible, as the party responsible for their management and processing, and those other persons contemplated in Section 7 hereto.

The above constitute all the internal IBEC methods for submitting a report, and their use must be prioritised. Nevertheless, reporting persons may also submit reports to the Independent Whistleblower Protection Authority, i.e. the Anti-Fraud Office of Catalonia, or any other authority with competence to received alerts.

Reports that involve self-reporting shall also be accepted, i.e. reports in which the whistleblower reports incident(s)/behaviour that implicate themselves personally. In such cases, the whistleblower shall be regarded as both reporting and reported person, with an obligation to respect the rights and obligations thereof.

Should anyone at the IBEC other than the Responsible receive a report in any way, they must immediately forward it to the Responsible and keep any information received confidential. Breach of this obligation may give rise to disciplinary measures.

Additionally, any information received from outside the IBEC, such as from the public administrations or the courts, shall be dealt with in compliance with this Policy and the Procedure on Managing Information Received. Furthermore, the Responsible may also apply this Policy to any incident(s) detected in the normal carrying on of its activities. In all such cases, reports received and/or incidents detected shall also be dealt with pursuant to this Policy and the Procedure on Managing Information Received.



## 2.2. Basic content of reports

Reports received via the Ethical Channel must, as far as possible, contain the following minimum information:

- The incident, behaviour or impropriety reported as well as the date(s) upon which it or they occurred. No classification or legal assessment of the incident shall be required of the reporting person, although they must have reasonable grounds for believing the incident/behaviour reported is true.
- The reason why they deem the incident/behaviour out of the ordinary or improper.
- The identity of the persons responsible for the incident(s)/behaviour, if known (reports shall also be accepted regarding unknown but identifiable persons).
- Any evidence that may be available proving that the incident/behaviour or impropriety has occurred (the submission of evidence by reporting persons is not compulsory but is advisable). Under no circumstances may evidence be obtained unlawfully or by infringing fundamental rights. In the case of any doubt in this regard, reporting persons shall refrain from obtaining evidence without first consulting with the third party they deem fit.
- Identification of the reporting person, although anonymous reports can also be accepted. Should an anonymous report be received via the Ethical Channel, the information received shall be processed with the safeguards appropriate for this kind of communication, without this preventing the application of this Policy or the Procedure on Managing Information Received. Specific priority mention must be made as to whether the reporting person or third parties are at risk, as must any serious immediate potential risk.

In any case, the reporting person shall have the duty to make a truthful report, with no misrepresentations, and without prejudice to the fact that the information reported relates solely to indications of the offences/infringements set forth in Section 1.2. Bad faith, such as the submission of false or baseless reports, is prohibited and shall be punished by the IBEC where possible.

## 2.3. Conflict of interest

Should the report directly or indirectly involve or implicate the Responsible, a second manager shall be appointed, so that the substitute may be appointed to take on report management tasks.

When such a situation of conflict of interest involving the Responsible arises, any failure thereby to recuse itself from its duties shall constitute a very serious breach of this Policy, with the resulting employment or contractual penalties that may be imposed.

### 3. THE DEFENCE AND OBLIGATIONS OF REPORTING AND REPORTED PERSONS

The IBEC shall, via the Responsible, ensure the protection of good-faith reporting persons who use the Ethical Channel in accordance with the provisions of this Policy, by means of the following guiding principles:

- a) It shall treat as confidential their identity and that of anyone mentioned in the report they make, as well as the incident(s)/behaviour reported. This means that only those persons so authorised, and identified above, may access information on the report, and may not share it with any other third party.
- b) It shall respect anonymity in cases in which the report is submitted on this basis. So, when a reporting person makes an anonymous report, their identity shall never become known.
- c) It shall furnish an interpreter or translated documentation when so required by the reporting party to understand the scope of their rights and obligations.
- d) It shall respect the total prohibition of any kind of reprisal, including threats and attempts thereof, due to any information that may be supplied to the investigation by the reporting person. Should a good-faith reporting person be subject to any reprisal due to their collaboration with the IBEC, the party responsible shall be immediately sanctioned, wherever possible. Should the reporting person believe they are victim of a reprisal, they must immediately notify the Responsible of the fact so that the IBEC may take the necessary measures.
- e) Generally speaking, it shall receive support and assistance from the IBEC for the time taken to manage the report and the procedures that may subsequently be carried out, and shall ensure respect for the provisions of the Procedure on Managing Information Received.

At the same time, reporting persons are subject to the following obligations:

- a) To act in good faith.
- b) Not to report false or manifestly untrue incident(s)/behaviour.
- c) To provide as much detail as possible with regard to the incident(s)/behaviour reported and to collaborate with the investigation as far as possible.
- d) As far as possible, to monitor the report made to remain informed as to its progress and to be in a position to respond to any requests for information made of them.
- e) To keep confidential the information they supply, the very existence of the report and its subsequent processing.

The IBEC shall also guarantee the rights available to the reported person, such as their right to honour, the presumption of innocence, not to be subject to “fishing expedition” investigations and to have access to the incident(s), action(s) or behaviour they are accused of and to be heard in this regard. All this is covered by the Procedure for Managing Information Received, which complements the provisions of this Section.

The Responsible shall ensure respect for the rights and obligations of both the reporting and reported persons throughout the report handling procedure and the subsequent outcomes, such as any judicial proceedings.

## **4. KEY PRINCIPLES OF THE SUBSEQUENT PROCEDURE FOR MANAGING REPORTS RECEIVED**

When the Responsible receives a report, it must – without prejudice to the provisions of the Procedure for Managing Information Received – embark upon the internal investigation of the incident(s)/behaviour reported, the key guiding principles of which are as follows:

- a) After receiving a report in any of the manners set forth in this Policy and only from persons authorised to do so, the Responsible shall send to the reporting person, within a maximum of 7 calendar days of the latter's receipt of the report, confirmation of receipt thereof, unless this might endanger the report's confidentiality.
- b) If necessary, such as when the information received is insufficient, the Responsible may, over the course of any investigations it may carry out, request of the reporting person more information regarding the incident(s)/behaviour reported.
- c) It shall study the reported incident(s)/behaviour and, firstly, analyse their credibility. In other words, it shall examine whether the report should be investigated and, on this basis, decide to proceed with or reject it. The reporting person shall be notified of this decision.
- d) Should the report pass the above credibility review, the Responsible shall commence an internal investigation carrying out the steps it deems necessary, such as interviewing the reporting person (if not anonymous), witnesses and the reported person, and/or examining any documentation that may be required.
- e) Throughout the carrying out of the entire investigation, it shall respect the rights and guarantees provided for in this Policy and in the Procedure for Managing Information Received, as well as in legislation, such as proportionality, impartiality, independence and the right to a defence, the presumption of innocence, the right to honour and for all of the parties involved in the investigation to be heard.
- f) Based on the facts of the case analysed, it shall issue a report of its findings, assessing said facts and reaching conclusions on them. Where applicable, the Responsible may also include in the report recommendations on the adoption of measures for improving the IBEC's procedures.
- g) Finally, based on the findings of the Responsible's report, the IBEC shall examine the need for adopting disciplinary or contractual measures or to take legal action.

## **5. COMMUNICATION**

### **5.1. Communication**

A copy of this Policy shall be issued, either by email or in hard copy form, to all its addressees, such that they may all be made aware of their duties, rights and guarantees with regard to the Ethical Channel. In any case, all addressees shall be guaranteed easy and ongoing access to this Policy. Should this Policy's addressees not speak Catalan, they shall be provided a translation into a language they can understand. Evidence of the issuing of this Policy to all its addresses shall be kept.

Furthermore, this Policy shall be published on the home page of the IBEC website, in a separate and easily identifiable section for simpler access thereto.  
<https://ibecbarcelona.eu/ca/canal-etic>

## **5.2. Interpretation**

Any doubts as to the interpretation of this Policy should be sent for resolution to the Responsible via the aforementioned email.

## **5.3. Training and awareness raising**

Additionally, the IBEC shall provide specific training on the use of the Ethical Channel to all its members, which shall be based on this Policy and which must include at least the following points:

- The existence of the Ethical Channel with the object and mission set forth herein.
- How to use the Ethical Channel properly and what its procedures entail.
- The rights and duties of Ethical Channel users.
- The obligation of addressees of this Policy to inform the IBEC of any of the cases set forth in Section 1.2.

The IBEC shall also provide specific training on managing the Ethical Channel to those responsible for receiving and dealing with reports, in this case the Responsible. It must guarantee that the Responsible is trained and equipped to manage the Ethical Channel.

The IBEC shall keep evidence of the courses or other training or awareness-raising activities it carries out on all the users of the Ethical Channel.

## **5.4. Undertaking by Policy addressees**

All IBEC members must be familiar with this Policy, actively contribute to respect thereof and report both any breaches of which they become aware and any shortcomings they may note in its contents or implementation. The IBEC Board of Trustees shall pay special attention to these duties.

## 6. POLICY VERSION HISTORY, APPROVAL, ENTRY INTO FORCE AND AMENDMENTS. EVIDENCE

### 6.1. Version history, approval and entry into force

#### Version history:

The table below shows the versions of the Policy that have been drawn up, together with their date and any subsequent changes made to each of them:

VERSION	AUTHOR	DATE	CHANGES
1.0	Outside advisor	June 2023	Initial version
2.0	Internal IBEC	June 2023	
3.0	Internal IBEC	October 2023	

#### Approval and entry into force:

This Policy shall be approved by the IBEC Board of Trustees. Set forth in the minutes of this approval shall be the date thereof. This Policy shall enter into force upon said date.

### 6.2. Policy monitoring, ongoing updating and amendment

#### Monitoring and ongoing updating:

Periodic reviews of the contents of this Policy shall be established to ensure it is updated to reflect the IBEC's current realities, changes in legislation or jurisprudence, etc. Additionally, its use shall be monitored and compliance with the Ethical Channel system measured using indicators. All of this pursuant to the principle of continuous improvement governing the IBEC's processes.

#### Amendment:

The Board of Trustees may amend this Policy upon its own initiative or at the proposal of any addressee hereof.

### 6.3. Custody of evidence

The Responsible shall be responsible for the custody of all evidence of training, monitoring, oversight and amendment activities carried out by the IBEC pursuant to the above sections. This shall be done in compliance with the personal data regulations associated with each area of IBEC activities.

## **7. PERSONAL DATA PROTECTION**

To ensure compliance with personal data protection legislation and, in general, to prevent the misuse of information, the IBEC shall guarantee, in its management of the Internal Information System and with regard to both the reporting and reported persons, as well as third parties, that any personal data processed as a result of the application of this Policy shall be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, and, in Spain, by Organic Law 3/2018, of 5 December, on the protection of personal data and the guarantee of digital rights, Organic Law 7/2021, of 26 May, on the protection of personal data processed for the prevention, detection, investigation and prosecution of criminal offences and on the enforcement of criminal sanctions, and Law 2/2023, of 20 February, governing the protection of persons reporting regulatory and anti-corruption offences, as well as those of the Procedure on Managing Information Received with regard to personal data protection.

## ANNEX I

### Definitions:

- a) **Ethical Channel:** a tool IBEC makes available to all its members and third parties so that they may, safely, confidentially and/or anonymously, report facts, behaviour and/or incidents that may constitute a criminal or a serious or very serious administrative offence.
- b) **Reporting person, whistleblower or complainant:** a person who, on an identified or anonymous basis, reports any of the above to the IBEC in the reasonable belief that the information is true at the time of submitting the report. They may be an IBEC member or a third party. Note that Spain's Law 2/2023, of 20 February, governing the protection of persons reporting regulatory and anti-corruption offences, only protects those with an employment or professional relationship with the IBEC reporting incidents or behaviour that constitute a criminal or a serious or very serious administrative offence, without prejudice to any protection that may be afforded to reporting persons in other bodies of law.
- c) **Reported person:** person who is alleged to be the perpetrator of and responsible for the reported incident(s) and/or behaviour. They shall also benefit from certain rights, as contemplated in the Procedure on Managing Information Received.
- d) **Responsible of the Ethical Channel Internal System:** a single person or collegiate body, appointed by the IBEC Board of Trustees and responsible for managing and handling the Ethical Channel and any subsequent internal investigations that may be carried out.
- e) **Reprisal:** any act or omission prohibited by law or that directly or indirectly entails adverse treatment placing those suffering from it at a particular disadvantage compared with another within an employment or professional context, due simply to the fact of their being a reporting person or having made a public disclosure. Examples include dismissal, lack of internal promotion, job changes, etc.

## **ANNEX II**

### **Confirmation of receipt of Internal Information System Policy**

By signing this document, I certify that I have received, read and understood the Internal Information System Policy and undertake to respect and comply with it.

Additionally I understand that if I breach its provisions, this may give rise to disciplinary sanctions by the IBEC.

I also hereby accept that I must keep myself abreast of amendments to this Policy and to read any future revisions that may be made to it.

DATE:

NAME:

SIGNATURE: