

Law & Economy

# CHANNEL OF COMMUNICATIONS

USER MANUAL

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## PRESENTATION

The **Communications Channel** is a system through which the company receives and manages communications from its employees and other members of its organisation (including suppliers), in relation to possible conduct of which they have become aware in a work or professional context, and which is contrary to the policies, standards of behaviour in any of the following areas or environments:

	SEXUAL AND GENDER-BASED HARASSMENT
$\odot$	CRIMINAL COMPLIANCE
$\bigcirc$	SCHOOL
$\odot$	ENVIRONMENT
$\bigotimes$	WORK
$\oslash$	ENVIRONMENT
$\odot$	REGULATORY AND ANTI-CORRUPTION INFRINGEMENTS (LAW 2/2023 ON THE PROTECTION OF WHISTLEBLOWERS)
$\bigotimes$	EQUALITY PLAN
$\bigcirc$	PREVENTION OF MONEY LAUNDERING AND
$\bigcirc$	FT PREVENTION OF CRIMINAL RISKS

The Communications Channel can be adapted to the needs of each entity.



### PERSONAL SCOPE OF APPLICATION

Pursuant to Law 2/2023, the following persons may be informants:

<ul> <li>SELF-EMPLOYED WORKERS</li> <li>SHAREHOLDERS, UNIT HOLDERS AND PERSONS BELONGING TO THE</li> <li>ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODY OF THE</li> <li>COMPANY         <ul> <li>(INCLUDING NON-EXECUTIVE MEMBERS).</li> <li>ANY PERSON WORKING FOR OR UNDER THE SUPERVISION AND</li> <li>DIRECTION OF CONTRACTORS, SUBCONTRACTORS, AND</li> <li>VOLUNTARY             PROVIDERS             <li>SCHOLARS</li> <li>TRAINEES</li> <li>PERSONS WHO COMMUNICATE OR DISCLOSE INFORMATION</li> <li>OBTAINED IN THE FRAMEWORK OF AN EMPLOYMENT OR STATUTORY             RELATIONSHIP THAT HAS ALREADY ENDED.</li> <li>PERSONS WHOSE EMPLOYMENT RELATIONSHIP HAS NOT YET BEGUN</li></li></ul></li></ul>	
<ul> <li>SHAREHOLDERS, UNIT HOLDERS AND PERSONS BELONGING TO THE</li> <li>ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODY OF THE</li> <li>COMPANY (INCLUDING NON-EXECUTIVE MEMBERS).</li> <li>ANY PERSON WORKING FOR OR UNDER THE SUPERVISION AND</li> <li>DIRECTION OF CONTRACTORS, SUBCONTRACTORS, AND</li> <li>VOLUNTARY</li> <li>PROVIDERS</li> <li>SCHOLARS</li> <li>TRAINEES</li> <li>PERSONS WHO COMMUNICATE OR DISCLOSE INFORMATION</li> <li>OBTAINED IN THE FRAMEWORK OF AN EMPLOYMENT OR STATUTORY RELATIONSHIP THAT HAS ALREADY ENDED.</li> <li>PERSONS WHOSE EMPLOYMENT RELATIONSHIP HAS NOT YET BEGUN</li> <li>(ONLY WHEN THE INFORMATION CONCERNING THE INFRINGEMENT HAS BEEN OBTAINED DURING THE SELECTION PROCESS OR WHEN THE INFORMATION CONCERNING THE INFRINGEMENT IS NOT YET AVAILABLE).</li> <li>PRE-CONTRACTUAL NEGOTIATION.</li> </ul>	SELF-EMPLOYED WORKERS
ANY PERSON WORKING FOR OR UNDER THE SUPERVISION AND DIRECTION OF CONTRACTORS, SUBCONTRACTORS, AND VOLUNTARY PROVIDERS SCHOLARS TRAINEES PERSONS WHO COMMUNICATE OR DISCLOSE INFORMATION OBTAINED IN THE FRAMEWORK OF AN EMPLOYMENT OR STATUTORY RELATIONSHIP THAT HAS ALREADY ENDED. PERSONS WHOSE EMPLOYMENT RELATIONSHIP HAS NOT YET BEGUN (ONLY WHEN THE INFORMATION CONCERNING THE INFRINGEMENT HAS BEEN OBTAINED DURING THE SELECTION PROCESS OR WHEN THE INFORMATION CONCERNING THE INFRINGEMENT IS NOT YET AVAILABLE). PRE-CONTRACTUAL NEGOTIATION.	<ul> <li>SHAREHOLDERS, UNIT HOLDERS AND PERSONS BELONGING TO THE</li> <li>ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODY OF THE</li> <li>COMPANY</li> <li>(INCLUDING NON-EXECUTIVE MEMBERS).</li> </ul>
PROVIDERS         ✓       SCHOLARS         ✓       TRAINEES         ✓       PERSONS WHO COMMUNICATE OR DISCLOSE INFORMATION         ✓       OBTAINED IN THE FRAMEWORK OF AN EMPLOYMENT OR STATUTORY RELATIONSHIP THAT HAS ALREADY ENDED.         PERSONS WHOSE EMPLOYMENT RELATIONSHIP HAS NOT YET BEGUN (ONLY WHEN THE INFORMATION CONCERNING THE INFRINGEMENT HAS BEEN OBTAINED DURING THE SELECTION PROCESS OR WHEN THE INFORMATION CONCERNING THE INFRINGEMENT IS NOT YET AVAILABLE).         PRE-CONTRACTUAL NEGOTIATION.	ANY PERSON WORKING FOR OR UNDER THE SUPERVISION AND OIRECTION OF CONTRACTORS, SUBCONTRACTORS, AND VOLUNTARY
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<ul> <li>✓ TRAINEES</li> <li>✓ PERSONS WHO COMMUNICATE OR DISCLOSE INFORMATION</li> <li>✓ OBTAINED IN THE FRAMEWORK OF AN EMPLOYMENT OR STATUTORY RELATIONSHIP THAT HAS ALREADY ENDED.</li> <li>PERSONS WHOSE EMPLOYMENT RELATIONSHIP HAS NOT YET BEGUN</li> <li>✓ (ONLY WHEN THE INFORMATION CONCERNING THE INFRINGEMENT HAS BEEN OBTAINED DURING THE SELECTION PROCESS OR WHEN THE INFORMATION CONCERNING THE INFRINGEMENT IS NOT YET AVAILABLE).</li> <li>PRE-CONTRACTUAL NEGOTIATION.</li> </ul>	SCHOLARS
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## ACCESS THE PORTAL

To access the **public channel** (via a web link without the need to register as a user), click on the link provided by the Entity and you will directly access the communications registration panel:

	Añadir comunicación
Canal de información	Página principal > Canal de comunicaciones
	Crear una nueva comunicación para la empresa EMPRESA DEMO (canal de comunicaciones)
	Para proceder a realizar la denuncia haga clic en "Realizar denuncia" y siga las instrucciones "La denuncia realizada tendrá carácter anônimo y su contenido será tratado con absoluta confidencialidad.
	Realizar comunicación
	Acceder a la comunicación en curso Introducir el código de la comunicación
	Recuperar comunicación

Click on "Make communication" and follow the steps indicated below.

To retrieve a communication and view its status, click on "**Retrieve** communication". We enter our unique identifier and access the content of the communication.

MAKE A
COMMUNICATION

Now we must select our company and acce	ept the <b>terms and conditions.</b>
to continue with the discharge process.	

MPLAINTS

	Condiciones Generales
Empresa Política de privacidad canal de información	1. DATOS IDENTIFICATIVOS DEL TITULAR DE LA PLATAFORMA En cumplimiento de la Ley 34/2002, de 11 de julio, de Servicios de la Sociedad de la Información y de Comercio electrónico, se informa al Usuario que el titular de la plataforma es: Nichday DF, S.L. con CIF B- 6552804, Inscrita en el Registrp Mercantil de Barcelona Tormo 42430 Folio 144 Hoja 407847. El acceso a este sitio web, a su contenido y a sus funcionalidades supone la aceptación expresa por parte del usuario de las presentes Condiciones Generales de uso, que podrán ser modificadas o sustituidas por su titular en cualquier momento y sin aviso previo.
Siguiente	2. OBJETO Este canal de comunicaciones ha sido habilitado para permitir a cualquier persona que haya tenido conocimiento de posibles infracciones del Código Etico y de Conducta, que puedan producirse por parte de los empleados, directivos, colaboradores o usuarios de la empresa o institución, poner tal circunstancia en conocimiento de las personas responsables. El acceso a y/o uso de la plataforma es totalmente voluntario y atribuye a quien lo realiza la condición de usuario. Todo usuario acepta, desde el mismo momento en el que accede, sin ningún tipo de reserva, el contenido

Finally, click on Siguente to go to the next registration form. In the following

form we will introduce the basic **identification** fields of communication. These fields are:

- **Category** of the events to be communicated (area in which the event occurs)
- Conduct (subcategory where we specify the type of reported behaviour)
- **Description** of the facts to be communicated

## COMPLA

•	Añadir nueva comunicación	
	<ul> <li>Categoría de los sucesos a comunicar</li> </ul>	
	Conducta a comunicar	
	Describa los hechos a comunicar	
1	Interior	Siguiente

Once the indicated fields have been filled in, click on Siguiente go to the next registration form.

to

\* If the event we want to report does not appear in any of the categories or behaviours defined by default, click on "OTHERS".

\*\* The description of the facts to be communicated should be as rigorous and detailed as possible.



In the following form we will introduce the fields that collect <u>the information</u> <u>necessary to manage the communication</u>. This form shall contain the identification data of the subjects reported, of the persons who have intervened in the events or who can provide information, as well as specifying when and where the events took place.

We will also be able to attach the <u>necessary documentation</u> to complement the communication.

Añadir nueva comunicación	
* Nombre y apellidos del denunciado y/o responsable	
Personas que hayan podido encubrir el hecho	•
Persona/s que pueden aportar información	0
* Cuando ocurrieron los hechos o tiempo que lleva sucediendo	
* ¿Cómo ha tenido conocimiento de los hechos?	 •
* ¿Cómo y dónde ha ocurrido?	
Adjuntar documentación Click o arrastre el documento para subirlo	
Anterior	Siguiente



Here, we will indicate whether we wish to create an anonymous or confidential communication (read description to distinguish between them) and, if we choose confidential communication, we will indicate our identification data (e-mail, name and surname, etc.) as the subject making the communication and we will click on "Send communication" to finish the process.

Anadir nueva comunicación	
	<ul> <li><u>COMUNICACIÓN ANÓNIMA</u></li> <li>Al presentar una comunicación anónima, le proporcionaremos un código único de seguimiento. Este código de comunicación es esencial para realizar un seguimiento posterior de su comunicación o si se le ha notificado para que aporte más información o aclare algún aspecto.</li> <li>Una vez que haya presentado la comunicación y reciba su código, asegurese de guardarlo en un lugar seguro. Este código le permitirá acceder al estado de su comunicación en cualquier momento.</li> <li>Le recomendamos que acceda a su comunicación como mínimo una vez por semana hasta que se archive el expediente, con el objetivo de no entorpecer la investigación de la misma.</li> <li>Si tiene dudas al respecto, puede ponerse en contacto con soporte@ovetaukl.com</li> </ul>
۲	<ul> <li>COMUNICACIÓN CONFIDENCIAL Al presentar una comunicación confidencial, tendrá que proporcionarnos un correo electrónico donde le notificaremos cada vez que haya alguna novedad relacionada con el estado de su comunicación . Queremos asegurarte que tu dirección de correo electrónico y datos personales será tratada con la máxima confidencialidad y no será compartida con terceros sin tu consentimiento. Nuestro objetivo es brindarte la tranquilidad de poder realizar un seguimiento efectivo de tu comunicación mientras protegemos tu privacidad. Estamos comprometidos a proporcionarte un entorno seguro y protegido para que puedas informar sobre cualquier situación preocupante sin temor a represalias.</li> <li>Si tiene dudas al respecto, puede ponerse en contacto con soporte@ovetauki.com</li> </ul>
Correo electrónico	
Su nombre y apellidos	

The last message that will appear on the screen will indicate that the communication **has been successfully created**:

#### Example of confidential communication:

#### CORRECTO

Se ha creado correctamente la denuncia, el código de seguimiento es:

#### Example of anonymous communication:

#### CORRECTO

Se ha creado correctamente la comunicación, el código de seguimiento es: 651165057D4D5

ATENCIÓN. ANÓTESE EL CÓDIGO DE LA COMUNICACIÓN, YA QUE ESTE NO SE VOLVERÁ A PROPORCIONAR

To **check the status** of a communication, access it via the Ovet Auki document portal (using the link provided by the entity) and click on the **VIEW** button.