

# ETHICAL CHANNEL

## 1. Purpose and Scope

ALIANZA LOGISTICS offers an ETHICAL CHANNEL that allows to communicate with total security the irregular, illicit or inadequate conducts related to accounting, control, auditing, non-compliance or violation of the duties included in our ethical code and anti-corruption policy, or any other internal regulation, as well as any conduct contrary to the law, in order to achieve the maximum level of satisfaction of its employees and economic partners, as well as its integration in the social ethical aspects, good governance and transparency. Send an e-mail to: [canal-etico@alianza-gt.com](mailto:canal-etico@alianza-gt.com), to resolve any queries or to report any such conducts.

## 2. Principles

- Any person related to ALIANZA LOGISTICS can make use of the Ethical Channel (it is a channel open to all employees, suppliers, clients and collaborators).
- All those conducts that could be irregular, illicit, inadequate, or suppose a breach or violation of our ethical code and anti-corruption policy, or any other internal regulation, general law or that could generate a reputational damage to ALIANZA LOGISTICS, must be communicated.
- Although the main objective of the Channel is the communication of irregularities, any person related to ALIANZA LOGISTICS can also make queries regarding any of the policies, procedures and protocols that are part of the internal regulations.
- The Ethics Committee is in charge of ensuring the correct functioning of the Channel, as well as of processing the communications.
- Communications to the Ethics Channel will be treated with complete confidentiality and will be handled as quickly as possible. In particular, the identity of the user who provides the information will be kept absolutely confidential at all stages of the process and, in particular, will not be disclosed to unauthorised third parties, nor to the incriminated person, nor, where appropriate, to their management.
- ALIANZA LOGISTICS has a zero tolerance attitude towards any type of retaliation or threat of retaliation against those who in good faith report a breach or suspected breach.

## 3. Ethics Committee

- The Ethics Committee is the body responsible for receiving, processing and investigating all communications received through the Ethics Channel. To this end, the Committee shall act in each investigation in an objective, independent, autonomous, expeditious and, above all, confidential manner.
- For the investigation of the communications, the Ethics Committee may rely on the heads of the different departments of ALIANZA LOGISTICS, as well as on external advisors if so required.
- In the event that any of the members of the Ethics Committee has a conflict of interest with the accuser, accused or any other person involved in the investigation, he/she will be immediately removed from the investigation.

## 4. Ethical Channel Procedure

### 4.1. Identification of a breach

- Any person connected with ALIANZA LOGISTICS who becomes aware of a breach or potential breach must report it as soon as possible through the Ethical Channel.
- The breach may be real, potential (when there is certainty and good faith about its possible perpetration), or constitute an attempt to conceal it.
- There must be sufficient and reasonable grounds to believe that the information is true at the time the report is made. Good faith must be maintained at all times and no slander must be spread.

- Notifications must be responsible, be in the interests of the common good and be within the cases for which the system has been implemented.

#### **4.2. Communication requirements**

All communications (except those whose purpose is to raise doubts regarding the internal regulations of ALIANZA LOGISTICS), as far as possible, must contain the following information:

- Identification of the accuser.
- Identification of the accuser/accused and others involved.
- The department or team to which the accuser/accused belongs.
- Description as detailed as possible of the incident being reported.
- Date and time of the occurrence.
- Location of the occurrence.
- How the alleged breach came to the knowledge of the accuser.
- Other information relevant to the report.
- Documentation/evidence relevant to the report.

#### **4.3. Communication and reception**

- The communication must be made by e-mail at: [canal-etico@alianza-gt.com](mailto:canal-etico@alianza-gt.com).
- The Ethics Committee must inform the interested party of the reception of the report within a maximum of 10 working days starting from the issue of said report.
- The interested party shall be asked to ratify the report. The Ethics Committee shall maintain communication with the interested party on the progress of the investigation and, if necessary, request additional information during the course of the investigation. Such communication shall be made within 20 working days of the reception of the interested party's report.
- The Channel's principle of confidentiality includes the alleged offender, who may exercise his or her right of defending themselves (access to the investigation to know the allegations against them and the evidence, presumption of innocence, due process, impartiality, and the right to be heard), without ever revealing the identity of the accuser. The accuser shall be notified within 3 working days of the opening of the investigation in order to be able to defend his or her interests properly.

#### **4.4. Assessment of a report**

- Once the information on the incident has been analysed, the following decisions may be taken:
  - Admission of the report: In the event of the conduct reported being in fact irregular, illicit or inappropriate in relation to accounting, control, auditing, non-compliance or violation of the conduct set out in our code of ethics and anti-corruption policy, any other internal regulations, or general laws and/or could generate reputational damage for ALIANZA LOGISTICS. The admission of the report activates the internal investigation, which is notified to the interested party.
  - Dismissal of the report: in the event of the conduct reported being in fact not irregular, illicit or inappropriate in relation to accounting, control, auditing, non-compliance or violation of the conduct set out in our code of ethics and anti-corruption policy, any other internal regulations, or general laws and/or could generate reputational damage for ALIANZA LOGISTICS. In case of there being any other type of breach, the Committee will inform the corresponding department. In the event of the report being completely inadmissible, it will be archived and the interested party will be notified of its inadmissibility.

#### **4.5. Action, investigation and resolution**

- The admission of the report activates an internal investigation, the opening of which will be notified to the Management Committee.
- ALIANZA LOGISTICS will provide the Ethics Committee with adequate resources so that internal investigations are carried out correctly and efficiently.
- When the Ethics Committee concludes the investigation, a final report is drawn up, which must include a proposed resolution.
- The final report of the investigation is submitted to the Management Committee for subsequent approval and decision.

#### **5. Protection of the accuser and the accused**

- Confidentiality of any communication means that its content and the personal data of each party shall at all times be kept strictly confidential, and access to it shall be limited to only those necessary. All personal data will be processed in accordance with the provisions of the General Data Protection Regulation; the only information that will be processed will be that which is relevant for the purpose of processing the communication.
- ALIANZA LOGISTICS does not tolerate, under any circumstances, retaliation against the accuser. Retaliation or threats of retaliation against any person related to ALIANZA LOGISTICS that makes use of the Channel for a report, ergo, an accuser, will be an incident.
- The confidentiality of the report, and of the investigation process in general, is a fundamental principle for ALIANZA LOGISTICS. All those who have access to the investigative procedure will have a strict obligation to keep the information secret, especially in relation to the identity of those involved. Failure to comply with the duty of confidentiality will result in an infringement.

#### **6. Protection of personal data**

- We inform you that the data provided by the users of the communication channels will be managed by ALIANZA LOGISTICS: GALADTRANS 2009 S.L., ALIANZA GALADTRANS S.L. and GRUPO ALIANZA MULTISERVICIOS S.L., kept under their responsibility and protected by the established security measures with the purpose of attending and managing in an adequate way the queries and/or reports sent to the Ethical Channel of ALIANZA LOGISTICS.
- You may request further information, as well as exercise your rights by sending a written communication to the e-mail address [protecciondatos@alianza-gt.com](mailto:protecciondatos@alianza-gt.com) or by post to the following address: C/ VICTORIA KENT 30, BAJO (12590) ALMENARA CASTELLÓN. In order to exercise your rights, you will be asked, if necessary, to provide proof of your identity. If you feel that your rights concerning the protection of your personal data have been violated, especially when you have not obtained satisfaction in the exercise of your rights, you can file a complaint with the Spanish data protection supervisory authority (Agencia Española de Protección de Datos), through its website: [www.aepd.es](http://www.aepd.es).

#### **7. Retention of information**

- The Ethics Committee will keep a record of all communications, which will be kept for the time the investigations demand.

- The personal data contained in a report will be retained only for as long as the investigation lasts, unless it is necessary to take certain measures against the reported person, in which case it would be possible to retain the data for a longer period of time. In any case, after three 3 months, the data must be deleted.
- Only those with internal control functions and/or those involved in the investigation (e.g. for disciplinary or evidentiary measures) will have access to the personal data contained in the report. Access by others or disclosure to third parties is only permitted when necessary for disciplinary or evidentiary measures, or for the purpose of legal proceedings.
- The Ethics Committee is responsible for retaining all communications made along with the record of investigations, evidentiary measures taken, decisions and other associated documentation for a period of 5 years from the entry of such communications (reports, in this case). At all times, the Ethics Committee shall take appropriate measures to keep the data confidential.

Date of approval: 1 March 2022

Approved by: Vicente Aguilar Galindo