



# Ethics Channel Management Procedure

## Criminal Compliance

PG.CP.05-03 - 14/11/2023



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## CONTENT

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1. OBJECTIVE	3
2. SCOPE	3
3. RESPONSIBLE PARTY	3
4. GENERAL CONSIDERATIONS	3
5. SCOPE OF THE ETHICS CHANNEL	5
6. PROCEDURE FOR HANDLING COMPLAINTS	6
7. GUARANTEES OF THE COMPLAINT CHANNEL AND COMPLAINANT PROTECTION	11
8. REFERENCES	15
9. CHANGE LOG	16



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## 1. OBJECTIVE

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1.1. Define the scope of application and operation of the Ethics Channel within the framework of IDE's Criminal Risk Management System (SGRP).

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## 2. SCOPE

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2.1. SGRP.

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## 3. RESPONSIBLE PARTY

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3.1. Compliance Committee.

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## 4. GENERAL CONSIDERATIONS

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### 4.1. Object.

4.1.1. The purpose of this procedure is to regulate the operating rules of IDE's Ethics Channel, defining the legal status of the complainant and the person being complained about, as well as the roles and responsibilities of each of the bodies involved in its management and the procedure for processing-complaints.

4.1.2. The Ethics Channel incorporates, in its configuration and operation, the legal requirements and guarantees for the protection of the complainant and the person being complained about as set forth in the following rules and reference standards in this area:

- 4.1.2.1. Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (Data Protection Act) and Organic Law 7/2021 of 26 May on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offenses and the execution of criminal penalties.
- 4.1.2.2. Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report infringements of Union Law and Law 2/2023 of 20 February on the protection of persons who report regulatory infringements and the fight against corruption.
- 4.1.2.3. Art. 31 bis Criminal Code and Circular 1/2016, of the State Attorney General's Office, which affects complaints and communications relating to the prevention of the crime of money laundering.
- 4.1.2.4. Standard UNE 19601 regarding the operation of the complaint channels.

### 4.2. Responsible party.

4.2.1. Among others, IDE's Regulatory Compliance Committee (CCN) will have the following main competencies in the management of the Ethics Channel:

- 4.2.1.1. receive complaints made through the Ethics Channel;
- 4.2.1.2. analyze the complaints received and to decide on their admissibility;
- 4.2.1.3. process the complaints and, as the case may be, instruct the corresponding files, being able to carry out the necessary investigations to verify the existence of the infringement that is the object of the complaint;



- 4.2.1.4. request external advice or internal or external expert reports, as well as to carry out any investigation action that is reasonable within the framework of the resolution of consultations or the admission for processing and investigation of files derived from a complaint;
- 4.2.1.5. provide advice to people who raise doubts or concerns about their complaint or communication within the target area made through the Ethics Channel.
- 4.2.1.6. request and receive the collaboration of all IDE members necessary for the proper processing and resolution of the files;
- 4.2.1.7. access all information and documentation related to the offence that is the subject of the complaint, including corporate emails of the person complained of under the legally permitted terms.
- 4.2.1.8. register the consultations and complaints that have been received, regardless of whether or not they have been admitted for processing; and
- 4.2.1.9. prepare the corresponding reports in accordance with this procedure and other IDE internal regulations.

## 4.3. Documentation.

- 4.3.1. All the actions carried out within the framework of the processing and investigation of a complaint, as well as the decisions adopted by the Regulatory Compliance Committee and the Administrative Body must be duly justified and documented, as the case may be, in a report or minutes signed by all the attendees, as well as recorded in the **IDE.CP.22 Complaints Register**.

## 4.4. Dissemination and communication.

- 4.4.1. This Ethics Channel procedure will be duly communicated to potential complainants and the persons being complained about, through a publicity campaign, among IDE members and stakeholders identified therein, as well as on the corporate website (Ethics Channel).
- 4.4.2. The Ethics Channel will remain permanently available to potential potential complainants and persons being complained about through IDE's website.
- 4.4.3. Without constituting the preferred form for the submission of complaints and as an alternative to this Ethics Channel of IDE, complaints may be submitted through external complaint channels to the competent administrative authorities, where appropriate, or to the institutions, bodies and agencies of the European Union.

## 4.5. Interpretation and review.

- 4.5.1. The interpretation of the provisions of this procedure shall be the responsibility of the Regulatory Compliance Committee, which shall review its provisions on a regular basis and may propose the additions and modifications that, at any time, it deems appropriate to update them.



## 5. SCOPE OF THE ETHICS CHANNEL

### 5.1. Subjective scope.

5.1.1. IDE's Ethics Channel is at the disposal of all its members, as well as any interested party with whom the company maintains a relationship (partners, employees, customers, suppliers, associations, etc.), so that they may bring to IDE's attention any suspicion or knowledge of any action or omission within the objective scope that has been, is being or will be committed by a member of IDE in the performance of his/her duties within the Company.

5.1.2. For these purposes, they are considered members of IDE::

5.1.2. For these purposes, they are considered members of IDE:

5.1.2.1. IDE's partners;

5.1.2.2. members of the Administrative Body;

5.1.2.3. General Management;

5.1.2.4. Department Heads; and

5.1.2.5. In general, the personnel rendering their services in the name and on behalf of IDE, regardless of the type or duration of their employment.

Notwithstanding the above, in the event that any of the members of the Regulatory Compliance Committee has suspicion or knowledge of the possible commission of an illegal conduct or irregularity within the objective scope of the Complaints Channel, said body may initiate an investigation procedure *ex officio*, following the phases established in this procedure.

### 5.2. Target scope.

5.2.1. The conducts that may be reported through the Ethics Channel are the actions or omissions that constitute or may constitute:

5.2.1.1. Infringements of European Union Law (current legislation)

5.2.1.2. Serious or very serious criminal or administrative infringement; including among these, specifically, those that may imply an economic loss for the Public Treasury and for the Social Security,

5.2.1.3. Non-compliance with IDE's mission, vision, values, guidelines, the rules of conduct set out in the **Code of Conduct (P.CP.02)**, the **Criminal Risk Prevention Policy (P.CP.01)** or other internal rules (policies, procedures and instructions).

5.2.2. It is expressly stated that the Ethics Channel is not intended as a means for the referral of doubts, queries, suggestions, complaints or for the communication of other conducts not included in the aforementioned objective scope, for which IDE has other channels enabled for this purpose.

### 5.3. Content of the complaints.

5.3.1. Complaints sent through the Ethics Channel must contain, at least, a clear and detailed description of the facts reported (time and place of occurrence, possible witnesses, factual statement, supporting documentation for the complaint...).



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- 5.3.2. Although it is not mandatory, it is recommended to indicate the identification of the person or persons complained about, if known, and their relationship with the company.
  - 5.3.3. All complaints may be anonymous, i.e. the identification of the person making the complaint is not mandatory but optional.
  - 5.3.4. All complaints must be supported by a principle of proof that allows the facts denounced to be accredited, at least, with a circumstantial character. To this end, the Ethics Channel allows the submission of supporting documentation for the complaint.
  - 5.3.5. The complainant may indicate a means to receive notifications, either an address or a safe place, or an e-mail. If you provide such means of communication, you will be notified of the admission and resolution of the complaint.

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## 6. PROCEDURE FOR HANDLING COMPLAINTS

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### 6.1. How to submit a complaint.

- 6.1.1. The communication of complaints through the Ethics Channel will be made by means of an online form that will be permanently accessible on IDE's corporate website.
- 6.1.2. The complainant may also request a face-to-face meeting with IDE's Regulatory Compliance Committee, which must be held within 7 working days of the complainant's request.
- 6.1.3. In the event of a face-to-face meeting, and after obtaining the express and informed consent of the complainant regarding the processing of his/her personal data, the conversation held shall be documented in any of the following ways:
  - 6.1.3.1. Recording of the conversation in a secure, durable and accessible format.
  - 6.1.3.2. Complete and accurate transcription of the conversation. In this case, the complainant shall be given the opportunity to verify, rectify and accept the transcript of the conversation by signing it.
- 6.1.4. In the event that the complainant has provided any means of communication through any of the aforementioned communication channels, once a communication or complaint has been sent through the Ethics Channel, the complainant will receive an acknowledgement of receipt within a maximum period of 7 calendar days following receipt of the complaint confirming that the complaint has been correctly processed.
- 6.1.5. In the event that complaints are not received through the aforementioned channels or are forwarded to any member of IDE other than the Regulatory Compliance Committee, the obligation of the recipient of the complaint to immediately forward it to the Regulatory Compliance Committee and the guarantee to maintain the confidentiality of the communication received is established.



## 6.2. Receipt of complaints.

- 6.2.1. All complaints sent through IDE's Ethics Channel will be received by e-mail by the Compliance Committee as the body responsible for the management of the Ethics Channel, which may refer them to an external advisor specialized in criminal risk management for the purpose of making an initial assessment on whether or not to admit them for processing by the Regulatory Compliance Committee. Both the Regulatory Compliance Committee and the external advisor shall act independently and autonomously, performing the necessary tasks under the premises of confidentiality, respect, independence, neutrality, impartiality, honesty and objectivity towards the persons being complained about and complainants.
- 6.2.2. Each of the complaints received through the Ethics Channel will be assigned a unique reference number in IDE.CP.22 Complaint Register to identify it throughout its processing.

## 6.3. Preliminary examination of the complaint.

- 6.3.1. Within a maximum period of fifteen (15) working days from receipt of the complaint, the external advisor shall conduct a preliminary review of the facts and the existence of sufficient evidence or indications for its admission or not for processing, as well as the possible concurrence of conflicts of interest with any of the members of the Regulatory Compliance Committee.
- 6.3.2. The conclusions of the external consultant on the preliminary study of the complaint shall be included in a report, which shall not contain the identity of the complainant in order to guarantee confidentiality and impartiality in the decision making process during its admission for processing. The external consultant will dissociate such personal data in the case of non-anonymous complaints.

## 6.4. Admission of complaints for processing.

- 6.4.1. 6.4.1. Once the external advisor's report has been received, the Secretary of the Regulatory Compliance Committee shall convene a meeting of said body, at which it shall discuss whether or not to admit the complaint for processing and the existence of sufficient evidence or indications on which to base this decision. The report prepared by the external advisor must be attached to the meeting notice for evaluation by all the members of the Regulatory Compliance Committee.
- 6.4.2. The convening, holding of meetings and adoption of resolutions by the Regulatory Compliance Committee shall be in accordance with the provisions of its Procedure regulating the activity and operation of the CC (PG.CP.04); the external advisor may attend said meeting as a guest, with voice, but without vote (unless he/she is a member of the RCC).
- 6.4.3. The Regulatory Compliance Committee may only decide to refuse admission to proceedings when:
  - 6.4.3.1. The reported facts do not refer to any of the persons included in the subjective scope indicated above and/or when
  - 6.4.3.2. The reported facts are not included in the objective scope of the Ethics Channel.



- 6.4.4. In the event that the complaint is inadmissible because the facts do not fall within the objective scope of the Ethics Channel, the Regulatory Compliance Committee may transfer the facts to other competent internal bodies in each case so that they may respond to the complaint through other internal procedures established for this purpose by IDE.
- 6.4.5. It is expressly stated that failure to comply with formal requirements shall not be an obstacle to the admission of a complaint for processing. Notwithstanding the foregoing, in the event that the complaint has been submitted anonymously or falsifying the identity of the complainant and no evidence has been provided as to the veracity of the facts reported, the Regulatory Compliance Committee shall be empowered to reject the complaint.
- 6.4.6. Once the decision on admission and/or inadmissibility has been adopted by the Regulatory Compliance Committee, the external advisor shall communicate such decision to the complainant within five (5) business days following the date of the decision on admission and/or inadmissibility, unless the complaint has been made anonymously or no contact information has been provided for notifications.

### 6.5. Investigation of complaints.

- 6.5.1. At the same meeting at which the complaint is admitted for processing, the Regulatory Compliance Committee shall decide how the process of investigation of the facts reported shall be carried out in order to accredit the veracity and reality of the facts, as well as to analyze their possible consequences and to determine the member of the Regulatory Compliance Committee responsible for conducting the procedure (hereinafter, the "instructor").
- 6.5.2. The investigator may carry out any actions deemed appropriate to clarify the facts, including, among others, access to documentation, interviews with the complainant, unless the complaint was anonymous, and with the person complained about, interviewing witnesses, conducting specific audits and hiring experts or external advisors.
- 6.5.3. In any case, all actions carried out within the framework of the investigation of the complaint shall respect fundamental rights, guaranteeing the lawfulness and proof of the evidence obtained. In addition, all actions will ensure maximum confidentiality regarding the identity of the complainant and any third party mentioned in the complaint, preventing access to such information by personnel not authorized by the management of the Ethics Channel.
- 6.5.4. The identity of the complainant may only be disclosed to the judicial authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or sanctioning investigation.
- 6.5.5. In the event that, in view of the information gathered during the investigation phase, the investigator appreciates the existence of situations that require immediate action to safeguard the interests of IDE or third parties, he/she shall immediately inform the Regulatory Compliance Committee, which may adopt precautionary measures such as:
- 6.5.5.1. Measures necessary to reduce or mitigate possible economic damages caused to IDE or third parties.
  - 6.5.5.2. Measures aimed at the recovery of assets that have been fraudulently used or diverted.





- 6.5.5.3. Measures to ensure the preservation of the evidence necessary for the investigation of the reported facts.
- 6.5.5.4. Actions necessary to correct the internal control weaknesses detected.
- 6.5.5.5. Immediate communication of the reported facts to the police and/or judicial authorities.

## 6.6. Hearing of the person complained about.

- 6.6.1. In parallel, at the time of opening the investigation phase, the Secretary of the Regulatory Compliance Committee shall inform the person complained about of the receipt of the complaint, of the actions or omissions attributed to him/her, of the processing of his/her personal data, of the decision to open an investigation and, if applicable, of the preliminary results of the investigation.
- 6.6.2. In application of the principle of contradiction and presumption of innocence, the person complained about must be given a hearing so that he/she may provide the information and documentation necessary for his/her defense, through any means of proof admitted in the Spanish legal system. The presumption of innocence and the honor of the person complained about shall be respected at all times.
- 6.6.3. This communication to the reported person may be delayed on an exceptional basis, provided that the Regulatory Compliance Committee so decides; when there are well-founded and objective suspicions that communication to the reported person could compromise the investigation; or there is a risk of destruction of evidence.

## 6.7. Proposed resolution.

- 6.7.1. Upon completion of the investigation, the investigator shall prepare a report with the conclusions obtained during the investigation within two (2) months from the date of receipt of the complaint by the Regulatory Compliance Committee. This term may be extended in cases of special complexity of the investigation and up to a maximum term of two (2) months from the admission for processing of the complaint.
- 6.7.2. This report shall contain, at least, the following points:
  - 6.7.2.1. Copy of the complaint (date of receipt, facts reported...), anonymizing the data of the complainant, if the complaint was not anonymous.
  - 6.7.2.2. Description of the actions carried out within the framework of the investigation, results obtained and previous measures adopted.
  - 6.7.2.3. Statement of the person complained about and, if applicable, of the complainant and evidence provided by each of the parties.
  - 6.7.2.4. Proposed resolution of the complaint (either by filing it or by adopting disciplinary measures). The proposed disciplinary measures must be in accordance with the disciplinary regime established in the Collective Settlement applicable to IDE.
- 6.7.3. Upon receipt of the investigator's report, the Secretary of the Regulatory Compliance Committee shall convene a meeting of said body for the study and discussion of said report and the preparation of a proposed resolution. For clarification purposes, it is hereby stated that the resolution proposal



made by the Regulatory Compliance Committee shall not be binding for the competent body for the resolution of the complaint, as indicated in the following section.

### 6.8. Resolution of complaints.

- 6.8.1. To ensure impartiality and independence in the various stages of the complaint process, the final decision on whether to close the complaint or to apply disciplinary measures will be made by IDE's Administrative Body.
- 6.8.2. The Secretary of the Regulatory Compliance Committee shall submit the conclusions report and the resolution proposal to IDE's Administrative Body within five (5) working days in order to make the final decision on the filing of the complaint or, if applicable, the adoption of disciplinary measures.
- 6.8.3. The complaint may only be archived when, in the opinion of the Administrative Body, the facts reported or their source have not been sufficiently accredited, or when they do not constitute conduct that can be subsumed within the objective scope of the Ethics Channel.
- 6.8.4. Once the resolution decision has been adopted, which must be in writing and sufficiently reasoned, the Administrative Body shall inform the Secretary of the Regulatory Compliance Committee of the resolution adopted.
- 6.8.5. Likewise, the Secretary of the Regulatory Compliance Committee shall inform the rest of its members of the result of the resolution of the complaint, as well as the complainant, unless the complaint was anonymous and no means of notification was provided, and the person complained about within five (5) working days from the day following receipt of the resolution of the Administrative Body. Such communication to the complainant and the person complained about may be made directly by the Secretary of the Regulatory Compliance Committee or, at the decision of the majority of its members, through the external advisor.
- 6.8.6. In any case, the communication of the resolution of the result of the investigation must be made within a maximum period of 3 months from the receipt of the communication, except in cases of special complexity that require an extension of the term, in which case, this may be extended up to a maximum of 3 additional months.

### 6.9. Adoption of measures.

- 6.9.1. In the event that the Administrative Body decides to adopt disciplinary measures, the Secretary of the Regulatory Compliance Committee shall inform the General Management and the Human Resources Department of this fact.
- 6.9.2. The disciplinary or corrective measures adopted, if any, shall be effective, proportionate and dissuasive and shall always be applied with full respect for the applicable regulations and the fundamental rights of the person sanctioned.



- 6.9.3. Finally, in the event that the reported act constitutes a criminal offense, the procedure for the Prevention of Crimes and Post-Criminal Measures [PG.CP.02] will be followed and the information will be transferred to the Public Prosecutor's Office. If the reported facts affect the financial interests of the European Union, the matter will be referred to the European Public Prosecutor's Office.

## 7. GUARANTEES OF THE COMPLAINT CHANNEL AND COMPLAINANT PROTECTION

### 7.1. Confidentiality.

- 7.1.1. IDE guarantees the utmost confidentiality with respect to all data collected and processed within the framework of the management of the Ethics Channel and, in particular, with respect to the identity of the complainant. In order to reinforce such confidentiality, the report prepared by the external consultant in accordance with section 6.3 shall not contain the identity of the complainant.
- 7.1.2. However, in case the complaint is admitted for processing, the identity and data of the complainant may be communicated to the investigator of the investigation, as well as to the other internal bodies of IDE involved in its processing, when it is strictly necessary for the success of the investigation.
- 7.1.3. Likewise, it is hereby stated that the right of access granted by the regulations on personal data protection shall be limited to the data itself, and under no circumstances shall the person complained about have access to the identification data of the complainant, if the report is not anonymous.

### 7.2. Conflict of interest management.

- 7.2.1. In the event that any of the members of the Regulatory Compliance Committee, the management body or any other body or department involved in the processing of a complaint is involved in an actual or potential conflict of interest, the necessary mechanisms shall be established in accordance with IT.CP.04. Anti-corruption anti-fraud conflict of interest management protocol so that, under no circumstances, he/she has knowledge of the identity of the complainant and must abstain from participating in the management of the complaint, being deprived of the right to vote in the adoption of decisions related to the processing of the complaint.
- 7.2.2. By way of example, a conflict of interest is considered to exist in the following cases:
- 7.2.2.1. Being involved in the reported facts or having a personal or professional interest in them.
  - 7.2.2.2. Be related by blood within the fourth degree or by affinity within the second degree to the complainant or person complained about.
  - 7.2.2.3. Having intimate friendship or manifest enmity with the complainant or person complained about.
- 7.2.3. The person in which any of the circumstances indicated in the previous point occurs shall immediately notify the Secretary of the Compliance Committee, who shall decide on the effective existence of a conflict of interest within five (5) working days following the reports and verifications that he/she deems appropriate.



7.2.4. Failure to disclose possible conflicts of interest or failure to abstain in those cases in which this has been agreed by the Secretary of the Regulatory Compliance Committee, or by the administrative body if the conflict derives from a member of the Regulatory Compliance Committee, shall give rise to the liability of the person in which such conflict arises.

7.2.5. Notwithstanding the foregoing, the actions of persons with grounds for abstention shall not necessarily imply the invalidity of the acts in which they have intervened.

### 7.3. Absence of retaliation.

7.3.1. Any form of retaliation, including threats of retaliation, attempted retaliation, criminalization or disparagement against persons who submit a complaint in good faith through IDE's Ethics Channel is strictly prohibited.

7.3.2. IDE will articulate the mechanisms and procedures necessary in each specific case to guarantee the indemnity of the bona fide complainant, adequately sanctioning any type of retaliation that, if applicable, he/she may suffer as a consequence of the submitted complaint.

7.3.3. Any complainant who feels that he or she has been the victim of an act of retaliation or negative consequences for his or her employment as a result of having filed a complaint must immediately notify the Compliance Committee, which will investigate the complaint and, if necessary, take appropriate corrective action.

7.3.4. The complainant will enjoy protection measures in relation to possible retaliation that may be articulated in the form of:

- 7.3.4.1. Suspension, dismissal, removal or equivalent measures;
- 7.3.4.2. Demotion or denial of promotion;
- 7.3.4.3. Change of job position, change of work location, reduction in salary or change in working hours;
- 7.3.4.4. Denial of training;
- 7.3.4.5. Negative evaluation or references regarding their work performance;
- 7.3.4.6. Imposition of any disciplinary measure, reprimand or other sanction, including monetary sanctions;
- 7.3.4.7. Coercion, intimidation, harassment or ostracism;
- 7.3.4.8. Discrimination, or unfavorable or unfair treatment;
- 7.3.4.9. Non-conversion of a temporary employment contract into a permanent one, in the event that the employee had legitimate expectations that he/she would be offered a permanent job;
- 7.3.4.10. Non-renewal or early termination of a temporary employment contract;
- 7.3.4.11. Damage, including to his/her reputation, especially on social media, or economic loss, including loss of business and revenue;
- 7.3.4.12. Blacklisting on the basis of a sectoral agreement, informal or formal, that may imply that in the future the person will not find employment in that sector;
- 7.3.4.13. Early termination or cancellation of contracts for goods or services;



7.3.4.14. Cancellation of a license or permit;

7.3.4.15. Medical or psychiatric references.

## 7.4. Allegations of bad faith.

7.4.1. A complaint shall be understood to have been made in good faith when it is based on reasonable evidence or belief and is not motivated by a desire for revenge or to cause harm to the person complained about.

7.4.2. On the contrary, disciplinary or other measures shall be taken, as deemed appropriate in each case, against those persons who have filed a complaint with knowledge of its falsity or manifest disregard for the truth or with the sole purpose of causing harm to the person complained about.

## 7.5. Protection of the person complained about.

7.5.1. The processing of complaints and the corresponding investigation shall be carried out in all cases respecting the fundamental rights of the person complained about and, in particular, the principle of the presumption of innocence, the principle of contradiction and the right to a process with all the guarantees.

7.5.2. In order to make these rights effective, in the event that a complaint is admitted for processing, the person complained about will be informed of the existence and content of the complaint and will be given a hearing so that he/she may allege and prove, through any means admitted in the Spanish legal system, what he/she deems appropriate for the defense of his/her interests.

## 7.6. Protection of personal data.

7.6.1. The person responsible for the processing of the personal data processed within the framework of the Ethics Channel as a consequence of the management of a complaint and, where appropriate, the corresponding investigation is IDE ELECTRIC S.L., with Tax Identification Number B50180397 and address at Calle Leonardo da Vinci, 2, Polígono Industrial Los Huertos, 50800, Zuera, Zaragoza.

7.6.2. The persons authorized to process personal data obtained through the Ethics Channel are limited to those who carry out regulatory compliance control functions at IDE, as provided for in this procedure:

7.6.2.1. The Regulatory Compliance Committee and the administrative body of IDE.

7.6.2.2. The person responsible for human resources management, exclusively in relation to the management of disciplinary measures;

7.6.2.3. The external advisor, in the event that appropriate legal action is taken, with whom a service contract and a data processing assignment contract are maintained; and

7.6.2.4. IDE's Privacy Officer.

7.6.3. All of the above persons are contractually bound by a duty of secrecy, reserve and confidentiality.



- 7.6.4. The personal data processed within the framework of the management of the Ethics Channel will be limited to those voluntarily provided by the complainant, in the case of non-anonymous complaints, and to those strictly necessary to process the complaints received and, where appropriate, to investigate the facts reported. Such data will be processed for the purpose of processing, investigating and/or resolving the corresponding complaints and to establish communications and notifications in accordance with this procedure. The information obtained through the Ethics Channel will not be used for any other purpose.
- 7.6.5. The legal basis that legitimizes the processing of personal data processed within the framework of the Ethics Channel is the legitimate interest of the controller to comply with the requirements in terms of legal and regulatory compliance, especially those related to the possible criminal liability of the legal person, in relation to Article 24 of Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights, as well as compliance with a legal obligation pursuant to the provisions of Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption.
- 7.6.6. The information processed in the context of the investigation of a complaint may be communicated to the human resources manager, to external legal advisors and to the judicial bodies and to the State Security Forces and Corps or administrative authority to whom the result of the investigation may be transferred, when necessary for the adoption of disciplinary measures or for the processing of the appropriate legal proceedings, as the case may be.
- 7.6.7. The data processed within the framework of the management of the Ethics Channel will be kept in the Ethics Channel system for the time necessary to decide whether to initiate an investigation into the reported facts and, where appropriate, while the process of investigation and resolution of the complaints filed is being developed, and always for a maximum period of 3 months from the date of entry of the complaint.
- 7.6.8. However, personal data may be processed for a longer period of time outside the Ethics Channel system, in the event that, as a result of the investigation process initiated on the occasion of the reported facts, it may be necessary to take appropriate legal action and/or may lead to the opening of legal proceedings, in which case it will be kept until a final judicial decision is obtained.
- 7.6.9. In any case, personal data must be deleted or blocked out of the Ethics Channel system after the deadline, if they are kept in this way for the purpose of evidencing, auditing or improving the functioning of the Ethics Channel or the SGRP.
- 7.6.10. The personal data contained in inadmissible complaints may only be anonymized, i.e. without any personal data associated with them and without the application of blocking.
- 7.6.11. Personal data provided through the Ethics Channel are not, under any circumstances, subject to international data transfer.
- 7.6.12. In any case, the persons whose data are processed within the framework of the management of the Ethics Channel may at any time exercise their rights of access, rectification, suppression, limitation, opposition, portability and other legally recognized rights, by contacting our postal address at Calle



Leonardo da Vinci, 2, Polígono Industrial Los Huertos, 50800, Zuera, Zaragoza, or by sending an e-mail to the following address [privacy@ide.es](mailto:privacy@ide.es), attaching a photocopy of their ID card or substitute identification document (Important to indicate Ref. Personal Data IDE Ethics Channel) for the processing of such rights by IDE's Privacy Officer).

7.6.13. In any case, it is reported that:

- 7.6.13.1. They will have the right to obtain confirmation as to whether or not their personal data is being processed at IDE - in the context of the management of the Ethics Channel - and to request the rectification of inaccurate data, or, where appropriate, to request its deletion, when, among other reasons, the data is no longer necessary for the management of the Ethics Channel.
- 7.6.13.2. They shall have the right to access their own personal data. In other words, the person complained about will not be provided with information about the identity of the person who made the complaint.
- 7.6.13.3. When the complainant requests a meeting with IDE's Compliance Committee for the purpose of filing a complaint, after having been informed about the processing of the complainant's personal data and having given his/her express consent, IDE will ensure that the content of the meeting is preserved in a durable and accessible format that can be verified, rectified and accepted by the signature of the complainant.
- 7.6.13.4. In the event that the reported person exercises the right of opposition, it will be presumed that, unless proven otherwise, there are compelling legitimate reasons that legitimize the processing of their personal data for the purpose reported.

7.6.14. Likewise, in the event that the right to the protection of personal data is considered to have been violated, a complaint may be filed with the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)).

## 8. REFERENCES

- 8.1. SGRP Manual (M.CP).
- 8.2. Criminal Risk Prevention Policy (P.CP.01).
- 8.3. Code of Conduct (P.CP.02).
- 8.4. Complaint Register (IDE.CP.22).
- 8.5. Procedure for the prevention of crimes and post-criminal measures (PG.CP.02).
- 8.6. Anti-corruption anti-fraud conflict of interest management protocol (IT.CP.04).
- 8.7. Procedure regulating the activity and operation of the CC (PG.CP.04).



## 9. CHANGE LOG

Version	Description	Date
01	Drafted	30/06/2021
01	Approval by the Regulatory Compliance Committee	16/11/2021
02	Updating in accordance with Law 2/23	09/06/2023
03	Update point 4.2.1.5	14/11/2023





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