

ETHICAL CHANNEL HANDBOOK

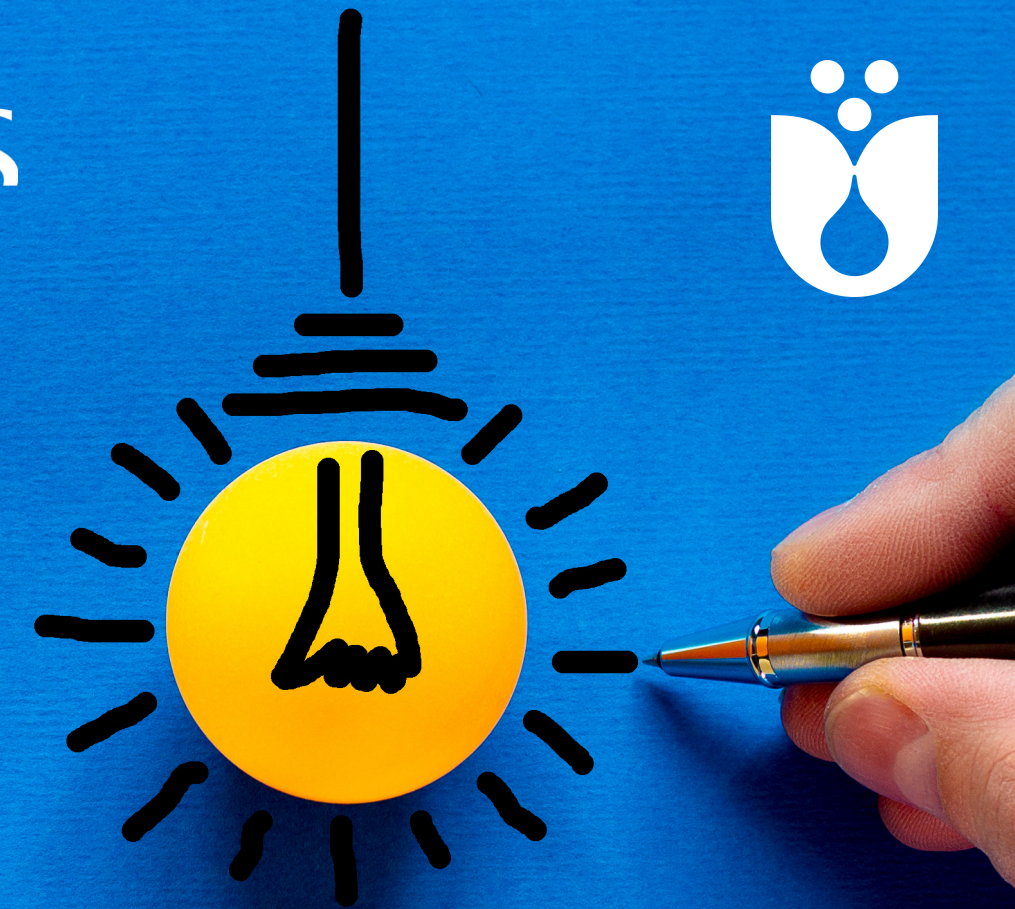


Legal Department 2024



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ETHICS

OF

CODE



1 The Ethical Channel. Presentation

The Ethics and Communications Channel is a system through which Provital receives and manages communications referring to possible conduct in a work or professional context, contrary to policies, standards of behavior of some of the following subjects or environments, of which somebody may have become aware:

- Sexual and gender-based harassment
- Criminal compliance
- School environment
- Work environment
- Infringements, regulations and anti-corruption (Law 2/2023 on whistleblower protection).
- Equality plan
- Prevention of money laundering and FT
- Prevention of criminal risks
- And others

This channel, whose management is outsourced to the experts of TARINAS VILADRICH ADVOCATS I PROCURADORS, SLP, allows both anonymous and confidential communications, at the choice of each informant.



2 Scope of application

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

- **Provitall employees**
- **freelance or any person working under the supervision of contractors, subcontractors and/or supplying companies**
- **Partners, directors and management**
- **Interns, trainees or volunteers**
- **Persons who have already terminated a labor or statutory relationship**
- **Persons whose employment has not begun, when the information is related to the recruitment process or hiring negotiation.**
- **Supplying companies**



3 Access to channel

Access the public channel (via web link, without user registration):



Access to Ethical and Communications Channel

<https://www.ovetauki.com/canal/provital>
Click here and select LANGUAGE ●

Make a disclosure or complaint report

Click on New disclosure and follow the steps indicated

Access the disclosure in course

To view the status of a communication already made, click on "Retrieve disclosure". Enter your unique identifier and access the content.

Access is available from any device, at any time of the day, 365 days a year.



Provital
Do Care

Canal de denuncias

Add disclosure

Página principal > Reporting channel

Create a new disclosure PROVITAL, S.A.

To proceed with the communication, please click on "New disclosure" and follow the instructions.

*This message remains strictly **anonymous** and the **confidentiality** of its content is **guaranteed**.

New disclosure

Access the disclosure in course

Enter the disclosure tracking number

Retrieve disclosure

ES | CA | EN



4 Make a disclosure or complaint report

<https://www.ovetauki.com/canal/provital> Public channel, no user registration required:

Step 1 Read and accept the privacy policy

Add new disclosure

Company

PROVITAL, S.A.

Privacy Policy

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR) regarding the protection of individuals with regard to the processing of personal data and the free movement of such data, as well as Organic Law 3/2018, of December 5, on Personal Data Protection and Guarantee of Digital Rights (LOPDGDD), as well as Organic Law 7/2021, of May 26, on the protection of personal data processed for the purposes of prevention, detection, investigation, and prosecution of criminal offenses and the enforcement of criminal sanctions, and Law 2/2023, of February 20, regulating the protection of persons reporting regulatory violations and combating corruption, whose main purpose is to protect individuals who, in a work or professional context, detect serious or very serious criminal or administrative offenses and report them through mechanisms regulated by this same regulation, we inform you about the processing of data:

Data Controller:
Company Name: PROVITAL, S.A.
Tax Identification Number (NIF): A-08584997
Address: Pol. Ind. Can Salvatella, C/ Gorgs Lladó nº200, 08210-Barberà del Vallès (Barcelona-ESPAÑA).

Purpose of processing: The data provided through the Whistleblower Channel will be processed to receive and process your report, as well as to provide adequate protection against retaliation that individuals may suffer when reporting any regulatory violations and corruption, in accordance with Law 2/2023, of February 20.

Legitimation: The processing of data is legitimized by the legal compliance with Law 2/2023, of February 20, regulating the protection of persons reporting regulatory violations and combating corruption.

Recipients: In a situation of criminal, disciplinary, or sanctioning investigation, the identity of the informant will be communicated to the Judicial Authority, the Public Prosecutor's Office, or the competent administrative authority.

On the other hand, your data will be processed by the company that owns the portal, NICHDAY DF, S.L., as Data Processor, for the effective processing and handling of the reported incident. NICHDAY DF, S.L. has entered into a contract with your company, for the purpose of complying with the provisions of Article 28 of Regulation (EU) 2016/679 on Data Protection.

NICHDAY DF, S.L. has implemented appropriate technical and organizational security measures to preserve the identity and ensure the confidentiality of the data concerning the affected individuals and any third party mentioned in the information provided, especially the identity of the informant if identified.

International transfer: Your data will not be subject to international transfers.

Data retention: It is established that communications may be kept within the information system only for the time necessary to decide whether or not to initiate an investigation. If this decision is not made within a period of three months, the communication must be deleted from the system, except for the purpose of maintaining evidence of the system's operation and in anonymized form if they were not sent communications.

Rights: The data subject may exercise the right to access their personal data, as well as request the rectification of inaccurate data or, if applicable, request their deletion when the data is no longer necessary for the purposes for which they were collected. You may also request the limitation, portability, and opposition to the processing of your data, in certain circumstances and for reasons related to your particular situation. If the

General conditions

1. IDENTIFYING DATA OF THE PLATFORM

In compliance with Law 34/2002, of July 11, on the Information Society and Electronic Commerce, the User is informed that the platform is registered in the Mercantile Register of the Province of Barcelona, Book 1, Folio 65528804. Registered in the Mercantile Register of the Province of Barcelona, Book 1, Folio 65528804.

Access to this website, its content and the use of these General Conditions of use, with or without prior notice.

2. OBJECT

This communication channel has been created to report possible breaches of the Code of Ethics of the company or its collaborators or users of the company in any circumstance.

Access to and/or use of the platform is reserved for those who accept, for themselves or for the company, the content of these "Legal Conditions" and read each one carefully before accessing the platform and assuming full responsibility.

The design and application of this Cor

Accept and NEXT

Accept privacy policy





4 Make a disclosure or complaint report

<https://www.ovetauki.com/canal/provital> Public channel, no user registration required:

Step 2 Enter the BASIC data for communication's identification

Página principal > Reporting channel > Add disclosure

🗨 Add new disclosure

● * Category of the events to be reported

● * Behaviour to report

● * Describe the facts you wish to report

Previous

●

Next

* * If the event we want to report doesn't appear in any of the categories defined by default, click on "OTHERS".

** The facts's description to be reported must be as rigorous and detailed as possible.





4 Make a disclosure or complaint report

<https://www.ovetauki.com/canal/provital> Public channel, no user registration required:

Step 3 Enter the REQUIRED data for the communication

This form will contain the identification data of the reported person, and also of those who have intervened or who can provide information.

Indicate when, how and where the events took place.

The form allows to attach the necessary documentation to complement the communication.

Reporting channel

[Página principal](#) > [Reporting channel](#) > [Add disclosure](#)

Add new disclosure

* Name and surname of the respondent and / or the responsible.

Persons who may have covered up the act

Person who can provide information

* When they happened or how long it's been going on

* How did you come to know the facts?

* How and where did it happen?

Attach files
Click or drop the document to upload it.

Previous Next





4 Make a disclosure or complaint report

<https://www.ovetauki.com/canal/provital> Public channel, no user registration required:

Step 4 Choose whether the communication will be anonymous or confidential

You will need to read in depth each description to distinguish them and choose.

Anonymous: no need to identify the complainant or provide contact details.

Confidential: the complainant identifies himself/herself to facilitate the evaluation and investigation of the complaint, with total guarantee of confidentiality.

ANONYMOUS DISCLOSURE

When submitting an anonymous communication, we will provide you with a unique tracking code. This code is essential for later tracking of your communication or if you have been notified to provide additional information or clarify any aspect.

Once you have submitted the communication and received your code, make sure to keep it in a secure place. This code will allow you to access the status of your communication at any time.

We recommend that you check your communication at least once a week until the record is archived, with the aim of not hindering its investigation.

If you have any doubts, you can contact support@ovetauki.com

CONFIDENTIAL REPORT

When submitting a confidential communication, you will need to provide us with an email address where we will notify you whenever there is any update related to the status of your communication.

We want to assure you that your email address and personal data will be treated with the utmost confidentiality and will not be shared with third parties without your consent. Our goal is to provide you with the peace of mind to effectively track your communication while protecting your privacy.

We are committed to providing a secure and protected environment for you to report any concerning situation without fear of reprisals.

If you have any doubts, you can contact support@ovetauki.com



Submit disclosure

** in case of choosing confidential communication, indicate your data (e-mail, name and surname, etc.) as the subject of the communication.

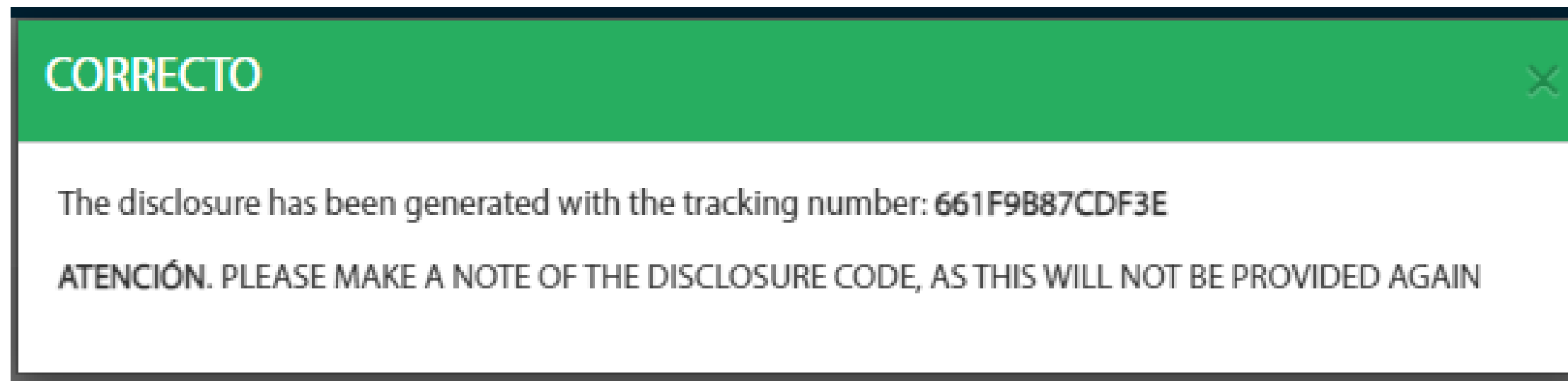




4 Make a disclosure or complaint report

<https://www.ovetauki.com/canal/provital> Public channel, no user registration required:

Step 5 Save your unique identifier code



Access the disclosure in course

To view the status of a communication already made, click on "Retrieve disclosure". Enter your unique identifier and access the content.





In case of doubts or incidents, contact the platform's technical service by e-mail:

soporte@ovetauki.com

