

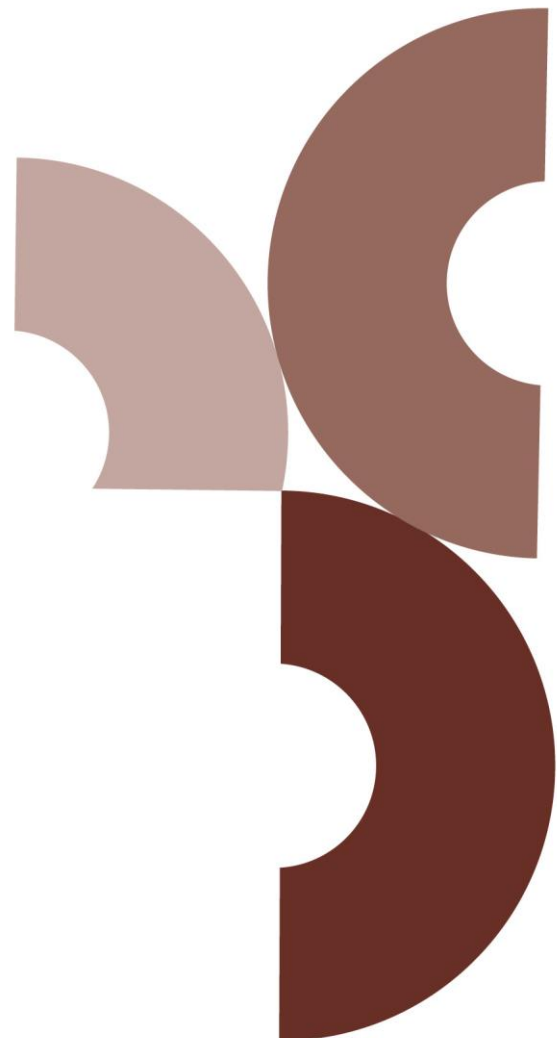


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**COMMUNICATION MANAGEMENT  
PROCEDURE**

**LA FINCA GROUP**

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## VERSIONS LOG

La Finca Group (hereinafter “the Company” o “La Finca”), has made, to the date, the following updates to its internal informative system policy (hereinafter “the System”):

Denomination	Approval	Date
Communication management procedure	Board of Directors	09/06/2023

## INTRODUCTION

The Compliance mailbox of La Finca Group (hereinafter “the mailbox” or “the channel”) from their internal’s information system, allows the submission of communications of different types of violation who can be committed under the wing of the Entity.

This information internal channel is complemented by an external channel meaning, who knows an event susceptible to be submitted in accordance with the Law 2/2023, on regulating the protection of persons who report regulatory violations and the fight against corruption (hereinafter “the Law” or “Law 2/2023”), may resort to:

- A Public Authority (Independent Whistleblower Protection Authority, A.I.P.I).
- To the respective authorities or autonomic institutions.
- To the Prosecuting Authority when value that the fact related in the communication constitutes a violation.

La Finca Compliance mailbox is authorized to receive any other communications or information not included in the scope established by Law 2/2023, although said communications and their senders will be outside the scope of protection provided by the same.

## STAGES OF THE PROCEEDING

La Finca Group, through his website <https://lafincarealestate.com>, makes available to all those interested in making a communication, the following management procedure, which is detailed in this document.

Moreover, the Board of Directors will be responsible for the channel manager as well as those responsible for receiving, accepting, processing, and resolving a communication:



Mailbox Compliance manager	Director of Legal Counsel
Recipient of Communication	Core Business Consulting
Body for admission and processing of communications	Director of Legal Counsel
Body for resolving communications	Director of Legal Counsel/ Internal Control Body

The procedure to make a communication conforms, therefore, the following steps:



### 3.1 Communication of the information

The communication can be made through the mailbox established for this purpose in the following link:  
<https://buzoncompliance.es/>

The communication can be done anonymous as identifying, oral or writing, or both forms, ensuring the confidentiality of the informant at all times.

Likewise, at the whistleblower request, a face-to-face reunion will be accepted, which must be held within a maximum period of 7 business days.

Regarding its content, it must reflect the following minimum requirements for proceeding with an internal investigation, if necessary:



Whistleblower	Action	Recipient
Identified	<p>The communication, which would identify the reporting party include the following information:</p> <ul style="list-style-type: none"> <li>▪ First and last name of the whistleblower and ID (or similar).</li> <li>▪ Contact information: telephone number, email address, etc.</li> <li>▪ Name of the Company to which the reporting party belongs.</li> <li>▪ Approximate date of action.</li> <li>▪ The subject and reasons for the communication: the reported facts must be described precisely and specifically. The reporting party may also attach any available evidence.</li> <li>▪ Information about the person reported (if known).</li> <li>▪ Whether or not it affects clients.</li> </ul>	CoreBC



Whistleblower	Action	Recipient
Anonymous	<p>Anonymous communication would include, among others, the following references:</p> <ul style="list-style-type: none"> <li>▪ Name of the Company with the business relationship has been maintained.</li> <li>▪ Information about the person reported (if known).</li> <li>▪ Approximate date of action.</li> <li>▪ The subject and reasons for the communication: the reported facts must be described precisely and specifically. The reporting party may also attach any available evidence.</li> <li>▪ Information about the person reported (if known).</li> <li>▪ Whether or not it affects clients.</li> </ul>	CoreBC

### 3.2 Register of the Communication

La Finca Group enable the Director of Legal Counsel, or in case of conflict of interest, the Internal Control Body, will be responsible for recording all communication sent by the external third that manages their reception (IBC) through the compliance mailbox. Likewise, you will be informed if the received communications expose facts or conducts that are not covered by the material scope of Law 2/2023.

When the whistleblower makes the communication, in a period of 7 business days next to their reception, except if that implies risk on the confidentiality of the communication, will receive an acknowledgment in the form of an alphanumeric code which you can track its status through the following link: <https://buzoncompliance.es/seguimientoComunicaciones.html>.

In case of identified communications, you will also receive a validation email at provided address, which must be validated within the next 24 hours. If validation is not completed, the reporting party will be notified that the communication has not been processed.



If the whistleblower decides to request an in-person meeting, within 7 days, they will provide with the necessary information regarding the date, time and location of the meeting, which must be held within maximum of 7 days of receiving the communication.

Once this initial assessment has been completed, a decision will be made, including any of the following:

#### **Dismiss the communication**

- i. Whenever the facts analysed lack any credibility or do not constitute violation of the legal system, in accordance with the provisions of this procedure.
- ii. When the communication is unfounded or there are indications that it was obtained through the commission of a crime.
- iii. When communication does not contain new and significant information regarding violations, compared to a previous communication whose analysis has been completed.

The non-acceptance will be communicated to the whistleblower within five business days of receiving the acknowledgement of receipt, unless the communication was anonymously.

#### **Accepting the communication**

Admission for processing will be communicated within five business days of receiving the acknowledgement of receipt, unless this communication was made anonymously.

#### **Forward the information to the Prosecutor Authority**

When the facts could indicate a violation criminal.

### **3.3 Investigation of the Communication**

In the event that an identified communication, has been made, the maximum timeframe for responding to the investigation may not exceed three months since the receipt of the communication.

If the communication was Anonymous, the response period will be three months from the expiration of the seven-day period after the communication was made.

However, in particular complex that require an extension, the deadline may be extended by up to a maximum of three additional months.

Aside from this, and whenever possible, the informant will be responded to within a reasonable timeframe, given the need to promptly address the issue being reported, as well as the need to avoid unnecessary public disclosure of information.

The investigation will include all actions aimed at verifying the veracity of the reported facts.



Without prejudice to the right to submit written allegations, throughout the investigation process, the affected person (accused) will be guaranteed the right to be informed of the actions or omissions attributed to them and to be heard at any time. Their rights to judicial protection and defence, access to the file, confidentiality, access to the file, confidentiality, confidentiality of identity, and the presumption of innocence must be guaranteed.

Once all relevant information has been obtained from both the informant and the accused party, a report will be drafted by an internal or external investigator (hereinafter the instructor), which will outline the guidelines to be followed during this stage of the process.

### **3.4 Investigation of the Communication**

The communication process will be kept in writing, and La Finca, through the Director of Legal Counsel or, in case of conflict of interest, the internal Control Body. The actions and statements made will be described including:

- Details of information and guarantee.
- Details of the affected of confidentiality party (the person reported)
- Compilation of information or evidence provided by both parties or witnesses.
- Final report that must address, at a minimum, the following aspects: type of communication, description of the facts reported, means adopted for the investigation, any documented results, and any recommended corrective measures.

If a violation is found, the facts will be reported to the Prosecutor's Office and the corresponding judicial authorities.

Finally, the report referred to in this procedure will include a proposed set of sanctions base on the severity of the conduct detected and will inform the reporting party and the person affected (the accused) of the measures taken; in accordance with the current legislation and the internal rules La Finca Group.

## **SUPERVISION AND REVIEW**

The Director of Legal Counsel will oversee the correct use of the compliance mailbox for which it will prepare an annual report on its operation, using for this purpose the communications log provided by the external third party in charge of receiving communications.

The referred report may include, as a minimum, the following information:

- Number of communications received.
- Origin of communications received (internal/external).



- Type of communications received.
- Number of communications investigated.
- Conclusion of investigated communications.
- Corrective measures taken.

## **COMPLIANCE MAILBOX COMMUNICATION**

La Finca Group is committed to disseminating information about the use of all internal information channels it has implemented, as well as the essential principles at its management procedures, to its employees and stakeholders in a clear and easily accessible manner.

If it has a website, this information must appear on the home page, in a separate and easily identifiable section.

The information provided must include the obligation of confidentiality regarding communications received.

## **REGISTER OF COMMUNICATIONS**

La Finca Group, must maintain a logbook containing all the communications received and any internal investigations they may have led to, ensuing, in all cases, the confidentiality of their content.

Personal data relating to communications received and the internal investigations referred to in the previous paragraph will only be retained for the period strictly necessary. Under no circumstances may data be retained for a period larger than 10 years.

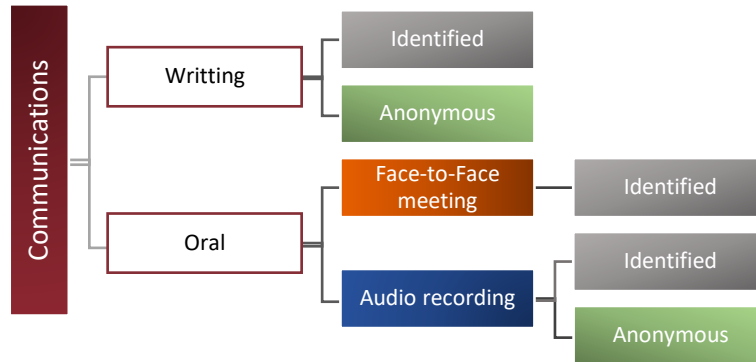
## **APPROVAL AND ENTRY INTO FORCE**

This procedure has been approved by the Board of Directors of La Finca Group and entered into force on the day following its approval.



# APPENDIX I: TYPOLOGY OF COMMUNICATIONS AND PROCEDURE

## 1. Typology of communications



## 2. Procedure

