



ETHICAL CHANNEL

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1. ETHICAL CHANNEL

The Ethical Channel is an internal information system that, in accordance with Law 2/2023, of February 20, regulating the protection of people who report regulatory infractions and fight against corruption (hereinafter, the “Law”), AURORA enables as the preferred channel for members of the company, suppliers, customers, workers, managers, associated companies, contractors, subcontractors and, in general, any other interested party, can report those events related to infringements of EU law, serious or very serious administrative infractions or crimes, and/or risks of legal and internal regulatory non-compliance within AURORA, whether they are materialized risks, that may materialize or that there are suspicions of having materialized.

2. SYSTEM MANAGER

In accordance with what the Law establishes, a natural person has been designated, responsible for the regulatory compliance function in AURORA, as responsible for the Ethical Channel, who exercises his functions autonomously and independently.

3. INFORMANT’S RIGHTS

The informant may present the information by email enabled for this purpose or, if requested, in person.

The confidentiality of your data is guaranteed throughout the entire process of managing the information presented. You also have the right to waive receiving further communications after presenting the information. Likewise, you can present the communication anonymously.

Unless you have expressly waived receiving communications or have presented your communication anonymously, you have the right to know the status of the processing of your communication and the final result of the system manager’s action within the established deadlines.

People who communicate or disclose infractions provided for in the scope of application of the Law will have the right to protection as long as the following circumstances concur:

- that they have reasonable grounds to believe that the information referred to is true at the time of communication or disclosure, even if they do not provide conclusive evidence, and that said information falls within the scope of application of the Law.
- that the communication or disclosure has been made in accordance with the requirements

provided for in the Law.

The Law expressly prohibits acts constituting retaliation, including threats of retaliation and attempts at retaliation against people who present a communication as provided for in it.

The adoption of any retaliation derived from the communication against informants or other persons included in the scope of protection established in article 3 of the Law is classified as a very serious infraction in article 63 of the Law.

4. DATA PROTECTION POLICY

The Law establishes that the processing of personal data derived from its compliance will be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016 (General Data Protection Regulation, GDPR); in Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights; and in Title VI of Law 2/2023 itself.

The person in charge of processing the data, received through the internal channel established, is an external third party, who, in the terms provided for in the Law, offers adequate guarantees of respect for independence, confidentiality, data protection and secrecy of communications.

5. PROCEDURE

For the management and processing of the information received, an Ethical Channel procedure has been defined which can be accessed through the link located on the Ethical Channel portal.

6. AFFECTED PEOPLE

As established by the Law, during the processing of the file, people affected by the communication will have the right to the presumption of innocence, the right to defense and the right to access the file in the terms regulated by the Law, as well as the same protection established for informants, preserving their identity and guaranteeing the confidentiality of the facts and data of the procedure.

7. FALSE COMMUNICATIONS

The Law specifies in its article 63 that communicating or publicly revealing information knowing its falsehood will constitute a very serious infraction.

