



COMPLAINTS CHANNEL USER GUIDE

LAW 2 / 2023 ON COMPLAINANT PROTECTION



MATERIAL SCOPE

WHAT MAY BE REPORTED?

- 1.-Breaches of European Union law. Annexed to Directive (EU) 2019/1937.
- 2.-Serious or very serious administrative infringements.
- 3.-Criminal offences.

Examples of such behaviour include:

- Fraud and scams.
- Irregularities with the Social Security or the Tax Authorities.
- Embezzlement.
- Money laundering.
- Situations of discrimination or sexual abuse.
- Conduct and behaviour possibly considered illegal within the workspace.
- Alleged profitable mismanagement of company resources.

PERSONAL SCOPE

WHO CAN FILE A COMPLAINT?

Any person who belongs to the company and external individuals who are or have been associated or related to the company in an occupational or professional context.

This includes individuals who participate in recruitment processes or who have a relationship through scholarships, volunteering or training, or who are self-employed or freelance.

Including shareholders or members of the administration, management, or supervisory body of an organization, as well as non- executive members. Legal entities for which the reporting person is employed by, or has an employment relationship, are within the personal jurisdiction of the law.

HOW TO DO IT?

MEANS TO WHICH INFORMATION CAN BE SUBMITTED

The informant may contact:

EXTERNAL SYSTEM

There is an external channel managed by the Independent Authority for the Protection of Informants (A.A.I). This channel is complementary to the internal channel, and is endowed with the guarantees of independence and autonomy required by the European Union.

The external channel can be used either directly or after the internal channel has been utilized. It allows for anonymous communication.

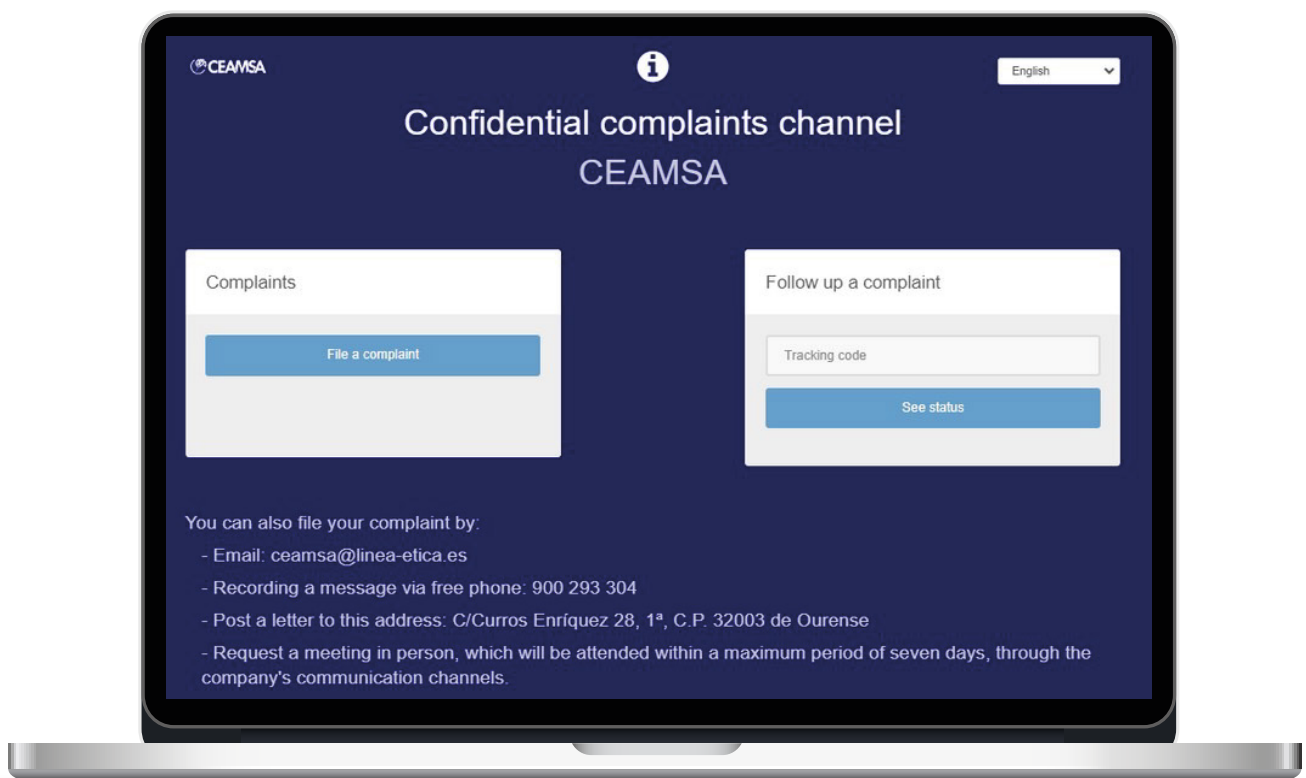
The timeframe for conducting investigations and providing a response may not exceed three months.

INTERNAL SYSTEM

ESCRITOS	VERBALES
Ethical line mail: ceamsa@linea-etica.es	Toll free number: 900293304
Form available on the web site	Meeting in person within 7 days
Postal letter to: C/Curros Enríquez, nº28, 1º, 32003 - Ourense	

HOW TO USE THE COMPLAINTS INTERFACE?

This is the channel page interface. From here you can generate the report or submit the information. In addition, the details for other means of communication are provided:

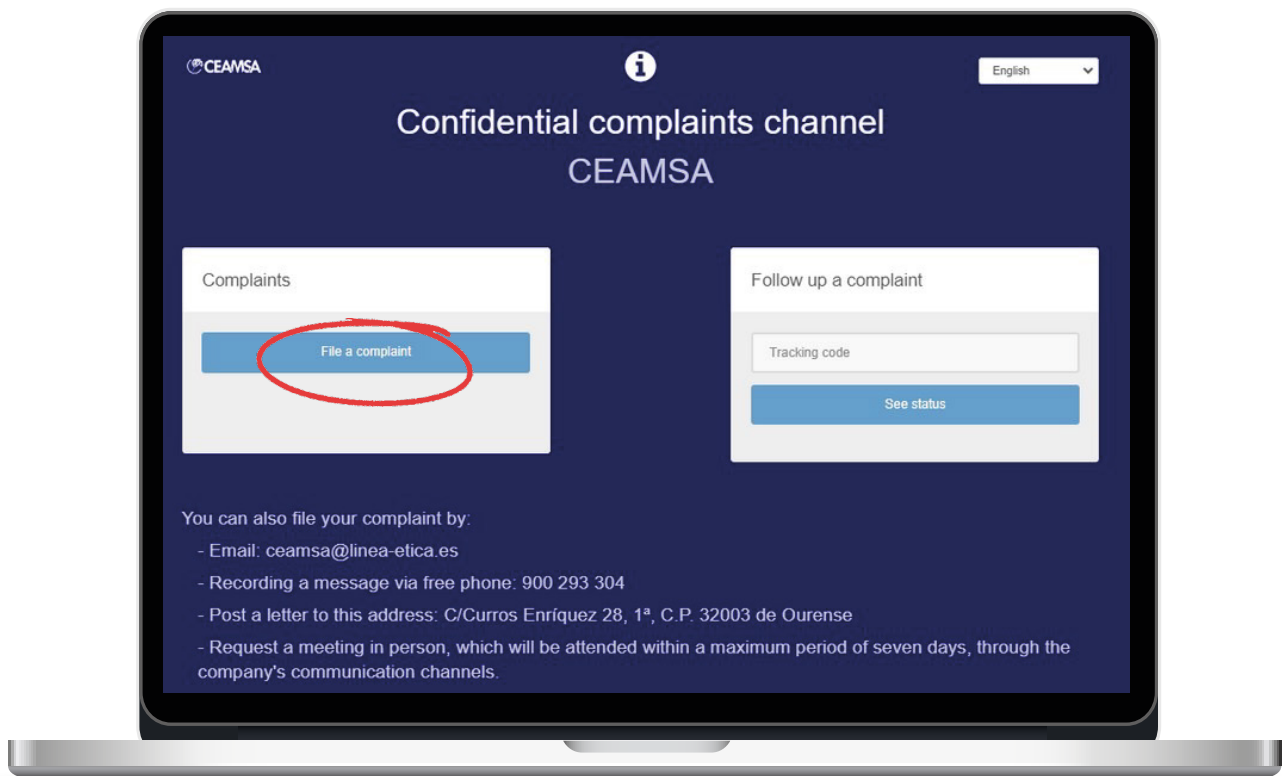


You can also file your complaint by:

- Email: ceamsa@linea-etica.es
- Recording a message via free phone: 900 293 304
- Post a letter to this address: C/Corros Enríquez 28, 1ª, C.P. 32003 de Ourense
- Request a meeting in person, which will be attended within a maximum period of seven days, through the company's communication channels.

HOW IS THE COMPLAINT FILED?

To file a complaint through the channel, click on the complaints button. Directly below the button you will see information on data protection.



Confidentiality and respect for data protection regulations are guaranteed throughout the process.

Once the new complaint button has been clicked, a form is opened to file a new complaint.

Please note that anonymous reporting is allowed, so identification and contact details are not mandatory. If accidentally obtained, they shall be disposed of without undue delay. If personal data is provided voluntarily, it is guaranteed that your identity will be kept confidential and will not be communicated to the person (or persons) to whom the facts relate or to third parties.

New complaint

Type of complaint ⓘ

Name and surname(s) (not mandatory)

Email (not mandatory)

Tel. number (not mandatory)

Company

Relationship with the company

Complaint text

Document

INFORMATION ON DATA PROTECTION

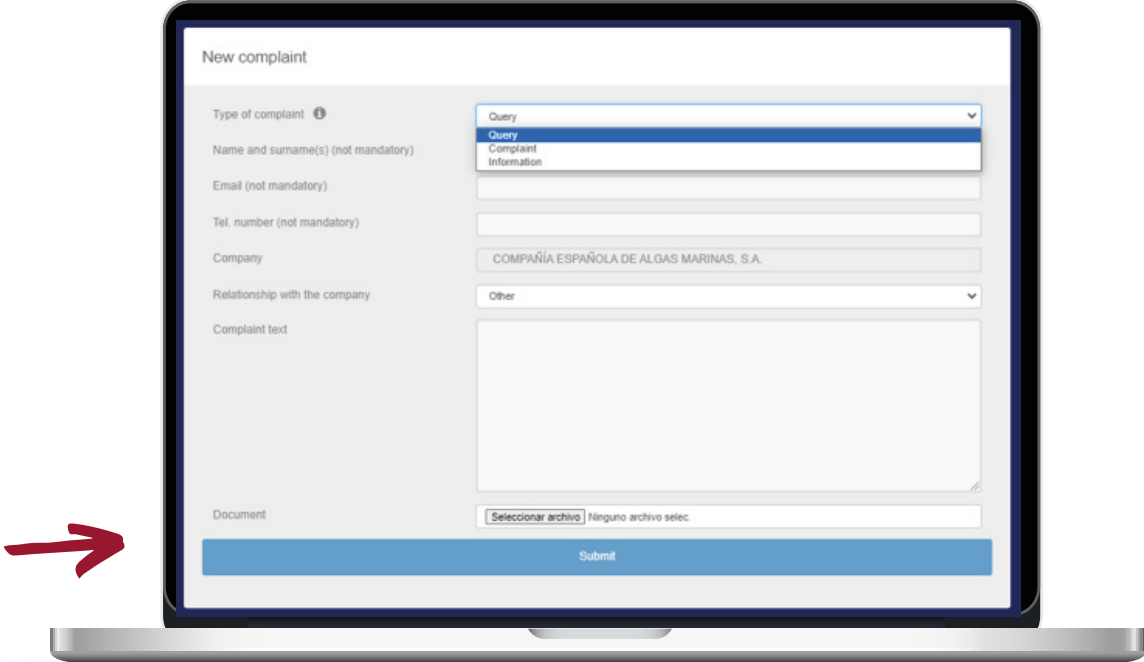
DATA CONTROLLER: Company indicated in the drop-down menu. PURPOSE: Process and manage the complaint filed. LEGAL GROUNDS: Compliance with a legal obligation, DATA TRANSFERS: Those legally provided. DATA RETENTION: Those strictly necessary for handling the complaint and legally established deadlines. RIGHTS: You may exercise your right of access, rectification, erasure, objection, restriction and portability by contacting the contact details indicated in the Privacy Policy of our website, as well as, where appropriate, to contact the data protection officer. In the event of any dispute, a claim may be filed with the Data Protection Agency.



Information on data protection is provided at the bottom.

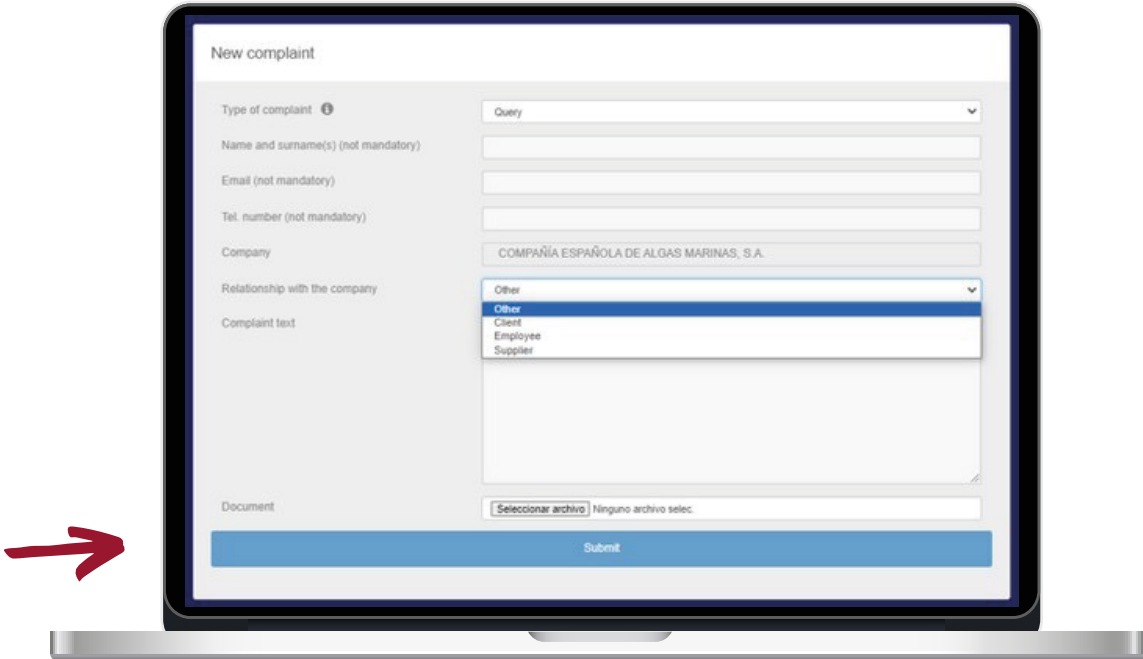
HOW DO I FILE A COMPLAINT? THE COMPLAINT'S FORM

There is a drop-down menu to select the type of complaint:



The screenshot shows a laptop displaying the 'New complaint' form. The form has several fields: 'Type of complaint' (a dropdown menu with 'Query', 'Complaint', and 'Information' options), 'Name and surname(s) (not mandatory)', 'Email (not mandatory)', 'Tel. number (not mandatory)', 'Company' (pre-filled with 'COMPAÑÍA ESPAÑOLA DE ALGAS MARINAS, S.A.'), 'Relationship with the company' (a dropdown menu with 'Other' selected), and 'Complaint text' (a large text area). At the bottom, there is a 'Document' field with a file selection button and a 'Submit' button. A red arrow points to the 'Type of complaint' dropdown menu.

And another drop-down to indicate the relationship or link to the company:



The screenshot shows the same 'New complaint' form as above, but with the 'Relationship with the company' dropdown menu open. The dropdown menu shows 'Other' selected, with other options being 'Client', 'Employee', and 'Supplier'. A red arrow points to this dropdown menu.

Complaint text

Document

Seleccionar archivo Ninguno archivo selec.

Submit




From the moment the complaint is filed, the maximum period for investigation and resolution is 3 months.

ACKNOWLEDGEMENT OF RECEIPT

All complaints filed through the channel automatically receive an acknowledgement of receipt with a tracking number so that the status of the complaint can be consulted. The acknowledgement can be downloaded as a PDF file by clicking on the link.

Company Complaint



Code Tracking
6e5007

Date created
19/01/2024 9.44 AM

Status of the complaint

Type of complaint
Query

Company

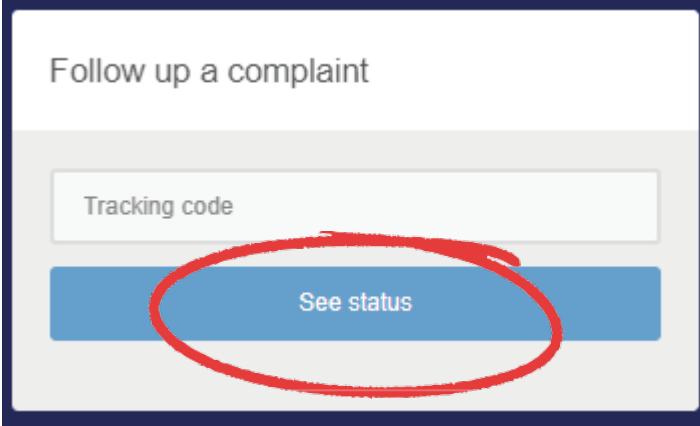
Relationship to customer
Other

Complaint text

FOLLOW-UP ON THE COMPLAINT

All complaints submitted through the channel's form have an associated tracking code. The status of a complaint can be consulted from the channel's home page in the section ***"Follow up a complaint"***.

A space is provided where the tracking number provided with the acknowledgement of receipt may be entered. To inquire about the status of the complaint, click on the query button



Follow up a complaint

Tracking code

See status

A new screen will open with the information.

BASIC PRINCIPLES OF THE INTERNAL SYSTEM

Everything contained in this manual and the internal reporting system itself complies with the requirements of regulation standards:

- 1.-Identification of internal information channel(s) with which they are associated
- 2.-The inclusion of clear and accessible information on external reporting channels to the competent authorities.
- 3.-Issuing an acknowledgement of receipt to the informant within seven calendar days of reception of the communication.
- 4.-Determining a deadline for responding to the investigation proceedings, which may not exceed three months from the receipt of the communication.
- 5.-The possibility to maintain communication with the informant and, if deemed necessary, to request additional information from the informant.
- 6.-Establishing the rights of the person concerned being informed of the acts or omissions attributed to him/her, and to be granted the right to be heard at any time.
- 7.-Assurance of confidentiality when transmission is made through channels other than the established reporting channels or to staff members who are not responsible for its processing;
- 8.-Respecting the presumption of innocence and the right to honour.
- 9.-Compliance with personal data protection regulations.
- 10.-Immediate referral of the information to the Public Prosecutor's Office when the facts could be indicative of a criminal offence.

WHAT RIGHTS APPLY TO THE REPORTING INDIVIDUAL?

The internal information system needs to guarantee the following:

- 1.- Confidentiality.
- 2.- No retaliation.
- 3.- Respecting Independence.
- 4.- Data protection.
- 5.- Secret of communications.
- 6.- Proper monitoring and investigation practices.
- 7.- Protection of the informant.

**CE
AM
SA**

The logo for CEAMSA is centered on a dark red background. It consists of the letters 'CE', 'AM', and 'SA' stacked vertically in a bold, white, sans-serif font. The 'SA' is positioned to the right of a circular emblem. This emblem contains a stylized white tree with a thick trunk and a dense canopy of leaves, set against a dark red background within the circle.