



Ethical Channel Protocol

1. Introduction

This protocol is part of the Whistleblowing Channel Policy of Consulmar S.L. and details the procedures for managing and responding to complaints.

2. Receipt of Complaints

All complaints must be received through designated channels, either anonymously or non-anonymously. The channels may include a dedicated telephone line, a specific email address, or an online portal.

3. Recording of Complaints

Each received complaint must be recorded with a unique identification and date of receipt. All relevant information provided by the whistleblower should be documented.

4. Initial Assessment

Upon receipt, the complaint will be preliminarily assessed to determine its credibility and urgency. This initial assessment must be carried out within a maximum of 5 business days.

5. Investigation

If the complaint is considered credible, a formal investigation will proceed. The investigation will be conducted by trained personnel and, if necessary, with the help of external experts.

6. Confidentiality

Confidentiality will be maintained throughout the investigation process. Only authorized personnel will have access to the complaint information.

7. Whistleblower Protection

Protection will be guaranteed for the whistleblower against any type of retaliation. Mechanisms will be established to support and assist whistleblowers during and after the process.

8. Resolution and Corrective Measures

At the end of the investigation, appropriate corrective measures will be taken if misconduct is confirmed. The whistleblower will be informed, as far as possible, about the outcome of the investigation.



9. Reports and Monitoring

Regular reports on the activities of the whistleblowing channel will be prepared for senior management. Monitoring will be conducted to ensure the effective implementation of corrective measures.

10. Protocol Review

This protocol will be periodically reviewed to ensure its effectiveness and update it according to applicable laws.

11. Contact for Inquiries

For inquiries related to this protocol, contact: Internal Manager of the Complaint System (canaletico@zubicar.es).