

## INTERNAL INFORMATION SYSTEM

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### I.- INTERNAL INFORMATION SYSTEM.

In compliance with Law 2/2023, of 20 February, *regulating the protection of persons who report regulatory breaches and the fight against corruption*, **ELAUSA ELECTRONICS, SL** states that it has an *Internal Information System*, with the company being responsible for the processing of personal data in accordance with the provisions of current legislation in this area.

In order to strengthen the culture of information and the infrastructures of dignity of **ELAUSA ELECTRONICS, SL** and to promote the culture of communication as a mechanism for the prevention of activities or omissions that may constitute infringements within the EU, serious or very serious criminal or administrative infringements as well as labour infringements in the field of occupational health and safety, the company has appointed the person responsible for the Quality and Environmental Management/Integrated Management and Information Security area, as the *person responsible for the System* and has activated by various means, an *Ethical Channel and Internal Information Channel* to be able to contact him:

-<https://elausa.report2box.com/home>

-At the postal address: Polígono Industrial Malloles, Calle Ermita de Sant Francesc, 1, 08500 Vic (Barcelona) -to obtain the person CPR/RSII-

-By writing delivered to the CPR/RSII person.

The reporting person may request, within a maximum period of seven days, a face-to-face visit with the person in charge of Criminal Compliance.

The verbal information collected in the face-to-face visit must be documented in one of the following ways, with the prior consent of the informant:

a) by recording the conversation in a secure, durable and accessible format.

The reporting person will be warned that the communication will be recorded and will be informed of the processing of their data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016.

b) through a complete and accurate transcription of the conversation made by the personnel responsible for processing it.

Without prejudice to the rights that correspond to them in accordance with data protection regulations, the reporting person will be offered the opportunity to check, rectify and accept the transcription of the conversation by signing it.

The Internal Investigation System complies with the requirements of Article 5.2 of the Law:

a) It allows the persons to whom the Law applies (Article 3) to communicate information, by various means, on the infractions provided for in Article 2 thereof.

b).- It is managed securely, guaranteeing that communications can be processed effectively within the company, as well as the confidentiality of the identity of the reporting person and of any third party mentioned in the communication and of the actions that are carried out in the management

and processing of the same, as well as data protection, preventing access by unauthorized personnel.

c) It has a Protocol for the use of the Channel that establishes guarantees for the protection of whistleblowers:

- Proof of receipt within seven calendar days of receipt of the information.
- A maximum period of three months to respond to the actions of the investigation, in the terms of article 9 of the Law, by completing and diligently safeguarding an Information Book-Register.
- Possibility of maintaining communication with the informant.
- Establishment of the right of the affected person to be informed of the actions or omissions attributed to him or her and to be heard.
- Guarantee of confidentiality when the communication is sent through complaint channels other than those established or to personnel not responsible for its processing, as well as the obligation for the person who receives it to immediately forward it to the person responsible for the System.
- Respect for the presumption of innocence and the honour of the people affected.
- Respect for the provisions on Data Protection (Title VI of the reference Law).
- Commitment to forward the information to the Public Prosecutor's Office immediately, when the facts could constitute a crime.

## II.- PROCESSING OF PERSONAL DATA.

**ELAUSA ELECTRONICS, SL** will process the personal data included in the communications received and protected by Law 2/2023, as the data controller, in order to be able to manage them and initiate, where appropriate, the corresponding investigation procedure. The legal basis for the processing will be compliance with a legal obligation, derived from the Law. If the communication contains data of a special nature, the legal basis shall be the essential public interest and other provisions established in section 2 of art. 9.2. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data.

Likewise, it is reported that these personal data may be processed and transferred by the personnel authorized for this purpose only, when necessary for the adoption of corrective measures to **ELAUSA ELECTRONICS, SL** for the processing of sanctioning or criminal proceedings that, where appropriate, may be appropriate. Personal data will be kept for the time necessary to decide on the appropriateness of initiating an investigation into the facts reported. In any case, if this decision is not adopted within a period of three months, the personal data contained in the communication will be deleted, except for the purpose of maintaining evidence of the operation of the system.

Personal data that is not considered to be true will also be deleted, unless this lack of veracity may constitute a criminal offence, in which case the information will be kept for the time necessary during which the judicial procedure is carried out.

Finally, it is stated that at any time the communicating person may request from the data controller, access to their personal data, their rectification or deletion, or the limitation of their processing, or to object, as well as the right to data portability, by sending a letter accompanied by a photocopy of their identity document to the address Polígono Industrial Malloles, Ermita de Sant Francesc street,

1, 08500 Vic (Barcelona) or by email [infoweb@elausa.com](mailto:infoweb@elausa.com). In the event of disagreement with the processing of your data, you may file a complaint with the Spanish Data Protection Agency, the body that holds the supervisory authority in the matter, located at C/ Jorge Juan, 6 (28001) Madrid ([www.aepd.es](http://www.aepd.es)).

### III.- NON-RETALIATION.

ELAUSA ELECTRONICS, SL expressly undertakes not to carry out acts constituting retaliation, including threats or attempts at retaliation against persons who submit a communication in good faith in accordance with the provisions of Law 2/2023, and to apply protection measures during the processing of a file, with respect to the persons affected by a possible communication.

### IV.- EXEMPTION AND MITIGATION OF THE PENALTY.

When a person who has participated in the commission of the administrative offence that is the subject of the information is the one who informs of its existence by submitting the information and provided that it has been submitted before the initiation of the investigation or sanctioning procedure has been notified, the body competent to resolve the procedure, by means of a reasoned resolution, it may exempt him from compliance with the administrative sanction that corresponds to him, provided that the points mentioned in Article 40 of the aforementioned Law are accredited.

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*(\*) The Internal Information Channel allows the presentation and management of anonymous communications.*

*(\*\*) Although whenever possible, the internal whistleblowing channel will be preferred, communications covered by Law 2/2023 may also be sent, where appropriate, when the object and seriousness of the situation so requires and the whistleblower deems it appropriate, to the Independent Authority for the Protection of Whistleblowers (Anti-Fraud Office of Catalonia within the scope of the CA of Catalonia). to the Public Prosecutor's Office or the European Public Prosecutor's Office, as appropriate.*