


INTERNAL CHANNEL
OF
COMMUNICATION AND COMPLAINTS
OF TECNOARANDA, S.L.



SUPERVISED BY
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Fecha: 04.12.2020


APPROVED BY
Board of directors
Fecha: 04.12.2020


The original document, which is approved by the Company's Management Body and on the date indicated above (by handwritten or electronic signature), is in the custody of the Company's Ethics and Compliance Committee.



INDEX

1. Purpose and scope of application	3
2. Complaint	3
3. Presentation of the Complaint.....	4
4. Protection of personal data.....	5



1. Purpose and scope of application

The **Internal Channel of Communication and Complaints** (the "**Complaints Channel**") of the entity **Tecnoaranda, S.L.** (the "**Company**") aims to establish a communication procedure between the Company's Ethics and Compliance Committee (the "**Committee**") and any administrators, managers, departmental units of the Company, employees, collaborators or third parties dependent on the Company (the "**Interested Parties**") so that they can bring to the attention of the Committee a fact or conduct related to (i) an action or omission that is allegedly criminal or that generates a risk of criminal charges for or in the Company, or (ii) an act or omission presumably generating a non-criminal offense within the Company, and (iii) any incident or breach of the Company's Code of Conduct.

This Statute will be duly updated when the applicable regulations so require, or at the Committee's own estimation it is necessary to do so in response to a specific need. Subsequently, it will be ratified by the Board of Directors.

2. Complaint

The **Internal Functioning Regulations of the Ethics and Compliance Committee** (the "**Regulations**") regulate the procedure for communication, processing, investigation, resolution and response to complaints, communications and inquiries (the "**Complaint**") within the scope of the Company (the "**Procedure**") presented to the Committee by the Interested Parties.

Any Interested Subject may initiate the Procedure in accordance with the provisions of the Regulations by using and completing the model form made available at any time by the Company on (i) its website <https://www.tecnoaranda.com/>, and (ii) physically in the mailboxes installed for this purpose and which is attached to this document as **Annex I**. Together with the complaint, the Interested Party You must attach all the documentation that you have and that serves as justification support for its content.

The complainant Interested Party, in addition to complying with the provisions of this document, must observe the rules and principles established in the Regulations when using the Company's Whistleblower Channel. Thus, with both documents, we proceed to regulate the operation of the Procedure that must be followed for the realization and processing of Complaints that are presented to the Committee, the powers of said body when processing and



resolving them, and the guarantees both for the Interested Subject complaining as for the accused in the course of the Procedure.

In order to avoid the fraudulent use of the Whistleblower Channel, the express prohibition of sending false reports is established. Thus, it will be understood that a false complaint is being made when it indicates false information, lacks justification or clearly responds to the bad faith of the complaining Interested Party, failing to truth and with a clear intention of harming the accused. In the event that the submission of a false complaint is appreciated, and apart from the communication of its inadmissibility, the measures deemed appropriate may be carried out.

3. Presentation of the Complaint

The Complaint communication, together with the corresponding form and the attached documentation, will be addressed and sent to the Committee by means of one of the following media, clearly indicating "*Confidential personnel*":

- (a) By postal mail (or any alternative means that allows acknowledging receipt of delivery), addressed to the Committee, Calle Premios Envero S/N – Polígono Industrial Prado Marina, 09400-Aranda de Duero (Burgos); or
- (b) Through the mailboxes set up for such purposes in the company; or
- (c) By email, addressed to the Committee, at the address compliance@tecnoaranda.com; or
- (d) Through the Company's website at the address <https://www.tecnoaranda.com/>.

Prior to filing the Complaint, the complainant Interested Subject must have confirmed that he has read, knows and accepts the content of this document, the Regulations and the Code of Conduct of the Company by indicating them in the box provided for this purpose in the case of electronic submission through the website and that, in the same way, you have been informed that your personal data will be processed and protected in accordance with the regulations on the protection of personal data in force, in particular the General Regulations of Data Protection ("**RGPD**"), the personal data provided of the person denounced is also protected.



In the same sense, and in the case of sending the Complaint sent by post or by email, the complaining Interested Subject must give their consent in the same terms as if it were made electronically through the website of the Society.

Once the Complaint has been sent in the terms described, the complainant Interested Party must receive a confirmation of receipt of the Complaint. The Channel will allow the possibility of submitting anonymous Complaints, providing the complaining Interested Subject with the option of not providing their personal data when sending the Complaint, as stated in Section 4 below.

4. Protection of personal data

The personal data of the complaining Interested Subject will be processed by the Company, that is, Tecnoaranda S.L., con domicilio en Calle Premios Envero S/N – Polígono Industrial Prado Marina, 09400-Aranda de Duero (Burgos). Similarly, the Data Protection Delegate can be contacted by email protecciondedatos@tecnoaranda.com (the "Delegate").

The Company will process the personal data of the complaining Interested Subject in order to manage, process and investigate the Complaint and adopt the disciplinary or legal measures that, in each case, correspond.

The complaining Interested Subject may choose to file the Complaint by providing their contact information or anonymously. The choice of one or the other option will not have major consequences on the complaining Interested Party.

That is why the complainant Interested Subject may choose, at the time of filing the Complaint, if she wishes the Company to treat her name as a complainant in order to process her notification in accordance with this document and the Regulations.

Depending on the individual situation and the content of the Report, it may be necessary to disclose the name to third parties, in particular to authorities and / or courts. The Interested Subject will have the right to withdraw their consent regarding the processing of their name in their capacity as complainant with effect for the future at any time and without giving reasons. For this purpose, you can contact the Delegate.



Even after withdrawal, it may be the case that third parties (eg authorities or courts) process your name. Your withdrawal cannot affect the legality of the treatment carried out until your withdrawal, as well as a treatment due to another legal justification (for example, the public interest described below or compliance with legal obligations).

The processing of personal data within the framework of the Whistleblower Channel is based on the existence of a public interest, in the terms established in article 6.1.e) of the General Data Protection Regulation, of detecting and preventing claims and the consequent prevention of damages and risks of liability of the Company. Likewise, the Company must comply with the legal obligation to resolve the queries made, applicable by virtue of the provisions of Organic Law 10/1995, of November 23, of the Penal Code, therefore compliance with legal obligations of article 6.1. c of the RGDP may also be the legal basis for the treatment.

In the case of a Report of an alleged infringement by an Interested Party, the treatment will also serve to prevent criminal offenses or other legal offenses in relation to their legal relationship with the Company.

The processing of your personal data will be strictly necessary to manage the Report and comply with the aforementioned purposes and legal obligations. Under no circumstances will the Company make automated decisions based on the data submitted.

Only those third parties to whom the Company is legally or contractually obliged to provide them will have access to your personal data, as well as the companies of the Haizea Wind Group and the WEC Group, whose list of companies can be found attached as **Annex II** to this document, at that has entrusted the provision of consulting and advisory services in relation to the management of the Whistleblower Channel, on behalf of the Company, insofar as it is necessary for the provision of those services. In no case will the Company carry out international transfers of your personal data to third countries or to an international organization..

The Delegate will keep the personal data for the time strictly necessary to decide on the origin of initiating an investigation into the facts or behaviors reported and, once decided, they will be deleted from the Whistleblower Channel, being able to process outside the system to investigate the facts for time necessary to make a decision. Once the investigation of the Complaint is completed and the appropriate actions taken, where appropriate, the data will



be kept duly blocked to comply with the legal obligations that, in each case, correspond. In any case, personal data will be deleted from the Whistleblower Channel within a maximum period of three (3) months from their introduction into the Whistleblower Channel, unless they are kept for an additional period as it is necessary to comply with legal obligations and related to the operation of the crime prevention model of the Company, and it may continue to deal with outside the Whistleblower Channel, in the event that the investigation of the Complaint has not been completed, for the necessary time.

The complainant Interested Subject may exercise, in the terms provided in the applicable regulations, the rights of access, rectification or deletion, as well as request that the processing of their data be limited, oppose it, or request the portability of their data by contacting writing to protecciondedatos@tecnoaranda.com, attaching a copy of your National Identity Document or other document that proves your identity and clearly indicating the right you want to exercise. If you deem it appropriate, you can also file a claim with the competent data protection authority.



Annex I

COMPLAINT FORM	
Name and surname of the complainant.	VOLUNTARY
Position held in the Company / Relationship with the company.	VOLUNTARY
Mail or telephone number.	VOLUNTARY
Name and surname of the allegedly infringing subject or subjects.	
Position and department held / n in the Company.	
Incidence.	
Attached Documentation.	<input type="checkbox"/> No <input type="checkbox"/> Yes If so, please list the attached documentation:
People who can provide information	
<input type="checkbox"/> I confirm that I have read and accept the content of the Code of Ethics and Conduct, the Internal Operating Regulations and the Internal Communication Channel, available on the company's website.	
Date:	Date:

Download:



Annex II

Subsidiaries and associated companies of the Haizea Group and / or WEC Group

Haizea Group:

1. Haizea Wind S.L.
2. Haizea Wind Group Management S.L.U.
3. Haizea Investments S.L.
4. Haizea International Investments S.L.
5. Haizea Metal Structures S.L.U.
6. Haizea Aranda S.L.U.
7. Haizea SOPEF S.L.
8. Haizea SICA S.L.
9. Tecnoaranda S.L.

WEC Group:

1. Sociedad Cartera Zestoa S.A.
2. Fundiciones Wind Energy Casting S.A.U.
3. Fundiciones Wind Energy Casting II S.L.U.
4. Superficial Treatments Metratak S.A.U.
5. Mecanizados Wind Energy Components S.L.U.
6. Mecanizados Wind Energy Components II S.L.U.
7. Conecta Logistics and Engineering S.L.U.
8. WEC Business and Technology Center A.I.E.
9. WEC Turquía S.L.

