

OPERATION POLICY OF THE ETHICAL CHANNEL OF ANGEL MIR

The Operation Policy of the Ethical Channel of PORTES BISBAL, S.L. (hereinafter, “ÀNGEL MIR” or the “Company”), defines and establishes the procedure regulating the operation of the Internal Information System (the “Ethical Channel”) of the Company, so that all those people who have knowledge, in a work or professional context, of any infraction in ÀNGEL MIR, can report it (even anonymously) to the System Manager (the Compliance Committee) through the channels that ÀNGEL MIR has enabled for this purpose.

In this sense, communications may be made through the following communication channels enabled in ÀNGEL MIR:

Through the e-mail address canaletico@angelmir.com;

- Through the e-mail address canaletico@angelmir.com;
- Vía postal mail to the following address: Carretera C-66 Girona-Palamós Km 12, 8, 17121 Corçà, Girona (España) (strictly for the attention of the Compliance Committee) or;
- By requesting a face-to-face Meeting with the System Manager.

The procedures for managing, processing, investigating and resolving the communications received through the Ethical Channel of ÀNGEL MIR will be carried out by the System Manager and will be governed mainly by three basic guarantees: i) the confidentiality of the informant identity 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; ii) absence of reprisals against informants and iii) guarantee that the rights of the accused person will be respected during the management and processing of the communications.

In this regard, ÀNGEL MIR undertakes not to adopt any form of reprisal, threats of reprisal or attempts of reprisal, direct or indirect, against the persons who, in good faith, have communicated any irregularity through the Ethical Channel.

Likewise, in any investigation procedure, the compliance with the principles of objectivity, the confidentiality of communications, the independence, good faith and protection of personal data shall be specially monitored, and the right to defence, the honour and innocence presumption of the persons under investigation shall be guaranteed. In addition, the procedure shall be transparent and shall guarantee the right to inform of the persons in it involved.

Upon receipt of the communication, and within a maximum period of seven (7) calendar days after its receipt, the System Manager shall acknowledge receipt of the communication to the reporting person, unless it is anonymous or that the reporting person has renounced to receive communications related to the investigation or that it may jeopardize the confidentiality of the communication.

In addition to the right to formulate written allegations, the investigation will include, whenever possible, an interview with the reported person in which, always having absolute respect for the innocence presumption, he / she will be invited to present his / her version of the facts and to provide those means of proof that he / she considers appropriate and pertinent.

Once all the investigative actions are completed, the System Manager will prepare and issue a report containing: a statement of the facts reported; the assessment of the communication content; the actions carried out in order to verify the plausibility of the facts; the conclusions reached in the inquiry; the assessment of the proceedings and the evidence that supports them; the measures adopted (if any), as

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well as the eventually taken decision that will be transferred to the governing body or administration for its adoption.

The maximum term to respond to the investigation actions may not exceed three (3) months from the communication receipt, except in cases of special complexity requiring an extension of the term, in which case, this may be extended, by decision of the System Manager, up to a maximum of an additional three (3) months.

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