

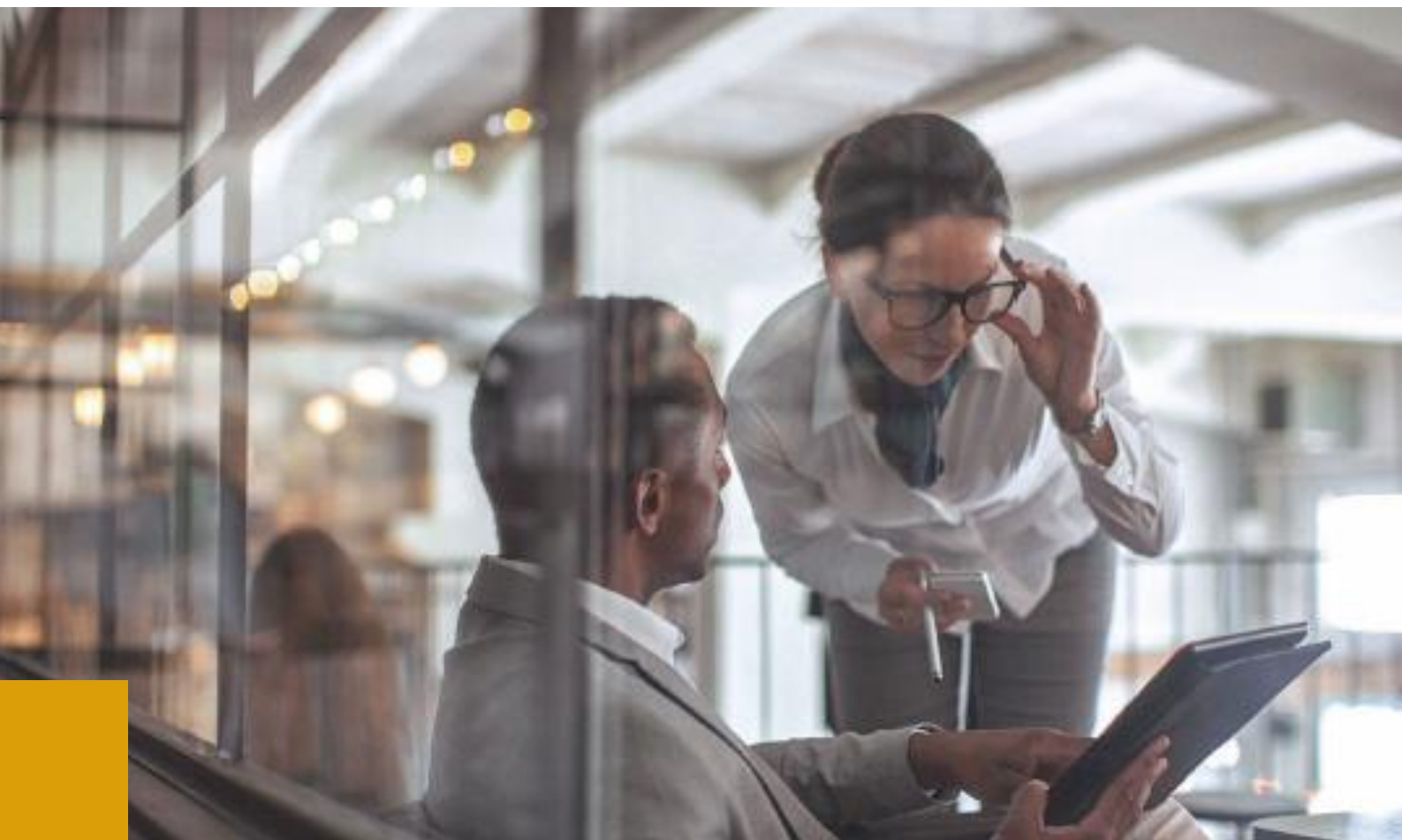


SARDINERO
HOTELES

Santander - Madrid

Internal Information System Policy

EL SARDINERO, S.A.



2025

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1. PURPOSE

At El Sardinero, S.A. we believe that ethical behaviour and compliance are fundamental pillars for the growth and sustainability of the organisation. We are also convinced that the behaviour of all the people who make up the organisation contributes to the consolidation of a true culture of compliance.

As one of the signs of this commitment, the organisation has implemented an ethical channel, which is a mechanism that promotes the confidential communication, even anonymously, of potentially illicit or irregular conduct that takes place in any of the companies that make up the company or that go against the principles and values, the code of ethics and other internal regulations.

This channel is one of the tools of the Regulatory Compliance Programme to prevent and reduce the risk of non-compliance. In addition, this tool contributes to the development of the SDG 16 targets.

The purpose of this Policy is:

- Regulate the Internal Information System of El Sardinero, S.A. , which shall be known and respected by all members of the organisation.
- To ensure the implementation of the Ethics Channel in an effective manner and in accordance with Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.
- Establish the general principles and guarantees of the Ethics Channel, ensuring the highest standards of quality, protection and compliance with current legislation.

2. SCOPE OF APPLICATION

The scope of application of the Ethical Channel Policy extends to all companies that make up or may come to make up El Sardinero, S.A.

The Ethics Channel can and must be used by all persons linked to the organisation, through an employment or professional relationship, as employees, as well as by third parties related to the organisation, suppliers, customers or third parties.

In accordance with the applicable regulations, the communications transmitted through the Ethics Channel must refer to conduct, whether actions or omissions, which may constitute

- Infringements of European Union law provided that they fall within the scope of the Union acts listed in the Annex to Directive (EU) 2019/1937 or affect the financial interests of the European Union or have an impact on the internal market.
- Infringements of the Spanish Criminal Code or serious or very serious administrative infringements.
- Infringements of El Sardinero's internal regulations such as the Code of Ethics, the Equality Protocol, the Crime Prevention Manual, among others.

Communications related to interpersonal conflicts that only affect personal interests (contractual, employment, holiday issues, etc.) or communications related to incidents regarding services provided (customer service) will not be processed through the Ethics Channel and will be handled through the specific channels provided.

Of course, communications made knowingly in a false manner or in bad faith will not be processed through the Ethical Channel, constituting a very serious infringement and giving rise to the initiation of sanctioning measures for those persons who use the Channel for this purpose.

3. RESPONSIBLE FOR THE ETHICAL CHANNEL

Communications are prohibited when the reporter is not acting in good faith. The following are good faith disclosures:

- Those that are made in accordance with the provisions of this Procedure, those that are based on facts or indications from which irregular behaviour, contrary to the Code of Ethics or any other internal or external regulations of the El Sardinero, S.A. may reasonably be inferred.
- Those in which, although no document or any other material supporting the indications of the report can be provided at the time of the report, they are made in accordance with the provisions of this Procedure and are made without manifest disregard for the truth, without intent to seek revenge, to cause damage to the employment or professional interests, or to harm the honour of any employee or third party, among others.

A whistleblower acting in bad faith shall be subject to disciplinary sanction, regardless of the criminal and civil liabilities that may arise from such actions.

4. PRINCIPLES AND GUARANTEES OF THE ETHICAL CHANNEL

The principles and guarantees on which the Policy and, thus, the Ethics Channel of El Sardinero are based are as follows:

- The Compliance Officer will make the Ethics Channel, its guarantees and operation known to all interested parties through awareness-raising and information strategies, and specific training actions on the use of the Ethics Channel will be included in the annual plan.
 - Easy access from the website itself will be ensured.
 - Throughout the process, data provided by stakeholders will be treated in strict confidentiality. Furthermore, it is possible to communicate anonymously.
 - All persons involved in a communication will be called upon to sign the relevant confidentiality clauses.
 - The Communicant will have access to the file of his communication and the persons involved will be kept informed of the results of the management affecting them.
 - Integral management carried out by impartial persons and ensuring the absence of conflicts of interest.
 - The absence of reprisals of any kind is guaranteed for those who use the Ethics Channel in good faith.
 - We will ensure that the information communicated is honest, complete and truthful, being rigorous with the good faith of the communications.
 - The rights of the communicator and stakeholders will be protected. It shall be assumed from the outset that all communications are made in good faith and that all persons are innocent unless there is evidence to the contrary.
 - The Channel Manager shall diligently process the information communicated to him/her in an independent and autonomous manner.
 - The legislation in force shall be respected at all times.
- Communications to the Independent Whistleblower Protection Authority
In the event that the whistleblower considers that the report cannot be effectively handled internally, or that there is a risk of retaliation, they may directly address the matter through the external reporting channel of the Independent Whistleblower Protection Authority, accessible via the following link: Information Note – Independent Whistleblower Protection Authority.

5. MANAGEMENT OF COMMUNICATIONS

The process for managing communications received through El Sardinero 's Ethics Channel is detailed in the Ethics Channel Procedure located on the Channel's platform.

6. APPROVAL, DISSEMINATION AND REVIEW

The Board of Directors of El Sardinero is the competent body for the approval of the Policy of the Internal Communication System-Ethical Channel, being effective from the moment of its approval, proceeding to its publication on the same day in the Ethical Channel available on the corporate website.

Training actions shall be carried out to enable the appropriate dissemination of this Policy and of the culture of compliance and communication within the organisation, through awareness-raising and information campaigns for stakeholders and training plans for the specific personnel managing the Ethical Channel.

This Policy will be reviewed and updated whenever it is necessary to make any modifications based on changes in the organisation itself or in the applicable legislation.

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