



**LÍNEA DIRECTA GROUP ETHICS CHANNEL
POLICY
APRIL 2023**



Important information about this document	
Name of Policy	Ethics Channel Policy
Related section of Línea Directa Group's Code of Ethics	VII. Violations and breaches of the code of conduct VIII. Communications channel
Related sections of other policies	
Rules and standards superseded	Ethics Channel procedure
Rules and standards repealed	Ethics Channel procedure
Related rules and standards	
Business unit or function affected	Línea Directa Aseguradora Group
Personnel affected	All Línea Directa Aseguradora employees
Main area responsible for monitoring	Ethics Manager
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1. Introduction

LINEA DIRECTA has an Internal Information System, the Ethics Channel, so that any person can report, with all due guarantees, any irregularity detected in compliance with the Code of Ethics or any other breach of current legislation, as well as raise queries about the Code's application. Employees may also use the channels provided by the People and Communication Area to report incidents or make queries related to their area of activity.

The Code of Ethics also establishes that there shall be no reprisals of any kind against employees who report alleged breaches in good faith.

In accordance with current legislation – in particular Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption – it is necessary to have an internal information system, which covers both the channel for receiving information and the party responsible for the system and the management procedure.

The board of directors of Línea Directa Aseguradora, in its commitment to zero tolerance towards crime, is aware of the importance of diligent and effective action within the organisation in investigating possible crimes, and approves this policy with the purpose of establishing the **general principles and procedure for management of the Ethics Channel.**

2. Principles of action

The following general principles of action in the management of the Ethics Channel are established to ensure that individuals who, in a work or professional context, detect breaches of regulations or actions contrary to the Code of Ethics, or any other breach of the legal regulations in force, report them with the due guarantees:

1. Confidentiality of the identity of the whistleblower and of any third party mentioned in the report, as well as of the processing of the information and its investigation.
2. Prohibition of reprisals.
3. Respect for the principle of the presumption of innocence and the right of defence of the parties concerned.
4. Independence, impartiality and absence of conflicts of interest in handling reports.
5. Effective processing of reports.
6. Accessibility.

3. Scope

This policy applies to all companies that comprise Línea Directa Aseguradora Group, as well as to the Línea Directa Foundation, under the terms provided for in the applicable regulations.

With regard to the subjective scope, the Ethics Channel will be available and accessible to any individual (including, but not limited to: workers, interns,

people who have not yet started or have completed their employment contract, customers and third party collaborators) so that any informant through said channel is under the protection of this policy.

4. Ethics Manager

The board of directors of Línea Directa Aseguradora has appointed an Ethics Manager as the individual responsible for the management of the company's Internal Information System, making this person responsible for receiving and responding to all questions and doubts that may arise from the application of the Code of Ethics, as well as for addressing, analysing, assessing and resolving the various reports received regarding possible breaches of regulations or inappropriate conduct.

The Ethics Manager is assigned the following functions in relation to the Ethics Channel:

- Promoting and planning the dissemination of the Code of Ethics and the Ethics Channel among Línea Directa Group employees and stakeholders.
- Resolving queries and advising stakeholders on questions of interpretation of the Code of Ethics regarding inappropriate conduct or breaches of regulations that may arise.
- Ensuring the proper functioning of the Ethics Channel:
- Addressing, managing, processing, supervising, assessing and solving the reports received until they are resolved.
- Presenting proposals to the head of the affected area and, where appropriate, to the management committee and the board of directors, in order to take decisions to remedy the non-compliance and adopt preventive

actions to avoid its repetition.

- Filing or proposing action plans when a situation of risk deriving from non-compliance is brought to light.
- Keeping an updated record of the process starting from the receipt of the report, including the steps taken, associated documentation and communications between the interested parties and those involved in the process.
- Regularly drawing up reports and statistics on the level of compliance with the Code of Ethics and reports received through the Ethics Channel, submitting the recommendations they deem appropriate to the board of directors.

The Ethics Manager must carry out their functions independently and autonomously and must have all the personal and material resources necessary to carry them out.

5. Ethics Channel

LINEA DIRECTA has implemented a tool to ensure better management of the reports that may be made through this channel.

The Ethics Channel allows for the submission and subsequent processing of anonymous reports.

The link to the Ethics Channel must be available both on the corporate website and on the intranet so that anyone can easily access it.

6. Report management procedure

Any queries, incidents or actions related to the Code of Ethics, breaches of national or European regulations or inappropriate conduct received through the Ethics Channel or the channels provided by People and Communication shall be processed in accordance with the provisions of this procedure.

Reports that refer to matters mentioned in the previous paragraph and are sent through other channels must be immediately brought to the attention of the Ethics Manager, so that the management of the report can be carried out in accordance with the provisions of this procedure, thus complying with all of its guarantees.

In this regard, it should be noted that entries related to the Group's regular provision of services (e.g. claims processing, policy management) shall not be analysed and shall be sent to the corresponding Area for resolution.

All actions associated with the Ethics Channel will be treated with the utmost confidentiality with respect to the identity of the person submitting the report and the information and documentation provided. To this end, a confidentiality agreement shall be signed, which shall be extended to all persons involved in the investigation of the report received and who shall be obliged to maintain professional secrecy with regard to it, and in particular with regard to the person submitting the report. A confidentiality agreement must also be signed by anyone who has received the report through channels other than those provided for in the system. Employees must be properly trained in this matter.

Without prejudice to the foregoing, the data of people involved in the report may only be disclosed either in the event that it is considered essential to prevent the commission of a crime, or if the reported facts give rise to the initiation of proceedings by the administrative or judicial authorities and to the extent required by such authorities, as well as in compliance with Regulation (EU) 2016/679 and Organic Law 3/2018, on Personal Data

Protection and guarantee of digital rights.

Personal data will not be collected if it is manifestly not relevant for processing specific information or, if collected by accident, will be deleted without delay.

1. Reception and recording

The report is received through the Ethics Channel, at which point the entry is recorded. Acknowledgement of receipt of the report must be made within 7 days.

2. Assessment and classification

The Ethics Manager will assess the content of the report to determine whether there is a possible breach of regulations, inappropriate conduct according to the Code of Ethics or a situation resulting from causes beyond the control of the Group and the people who form part of it.

The Ethics Manager can:

- a) Admit the report for processing and initiate the investigation.
- b) Reject the report for processing, in which case they shall reply to the whistleblower, informing them of the reasons for the rejection and possible remedy (if any information necessary to initiate the investigation is missing) or referral of the report to another body for resolution in the case of matters that are outside the scope of action of the Ethics Manager.

Reports will not be processed when they deal with matters related to the provision of LINEA DIRECTA's services and are not related to the Code of Ethics or to any breach of regulations.

3. Assignment and investigation

Once the complaint has been accepted for processing, the Ethics Manager shall initiate the necessary investigations to clarify the facts, and the investigation of the report shall commence. The Ethics Manager may keep in contact with the whistleblower and request additional information.

For this task, the Ethics Manager may use the system to request the support of third parties, whether internal or external to the Company, in order to take the necessary steps to obtain information, documentation or expertise on the events described in the report. This allows for maintaining both the traceability and confidentiality of the information, as well as monitoring of the individuals involved in the process. Once the task has been completed by the Manager, their access will be cancelled and they will no longer be able to access the report.

During the investigation of the incidents reported, the affected parties and witnesses will be given a hearing, and the Ethics Manager will take any steps deemed necessary. The participation of witnesses and other intervening parties shall be strictly confidential. This hearing process shall include, at the very least, an interview with the person being reported, in which they may make any allegations they deem appropriate in relation to the events reported.

The person concerned shall be informed of the actions or inactions attributed to them, and shall have the right to be heard at all times. This communication shall take place at the time and in the manner deemed appropriate to ensure the proper handling of the investigation.

The investigation shall at all times be conducted with respect for the presumption of innocence and the honour of the person concerned.

4. Resolution

At the end of the investigation, the maximum duration of which shall be 3 months, which may be extended to 6 months in justified cases, the Ethics Manager shall pass a resolution, which may involve:

- Transferring the report to the Risk Area or to the People and Communication Area, in accordance with the specific procedures regarding financial irregularities and irregularities involving individuals as per sections 7 and 8 of this Policy.
- Closing the report on the grounds that there has not been any type of breach or inappropriate behaviour.
- Presenting proposals to the head of the affected area and, where appropriate, to the management committee and the board of directors or to the president of the Foundation, in order to take decisions to remedy the non-compliance and adopt preventive actions to avoid its repetition. This proposal shall include the disciplinary measures to be taken, subject to the approval of the chief executive officer or, as the case may be, the board of directors, and implemented by the People and Communication Area in accordance with the provisions of labour legislation.

5. Communication of the resolution

The Ethics Manager shall communicate the resolution to the whistleblower through the Ethics Channel system.



7. Specific procedure for potentially significant irregularities, especially of a financial and accounting nature

When problems are raised through the Ethics Channel regarding irregularities of potential legal significance, especially of a financial and accounting nature, and which affect the internal control systems, procedures and accounting practices, the Risk Management and Internal Control Area shall be notified and the matter shall be resolved with their collaboration.

8. Specific procedure for the prevention of situations of workplace and sexual harassment

When matters relating to possible situations of workplace and sexual harassment are raised through the Ethics Channel, they will be reported to the People and Communication Area for management in accordance with the procedure established in the specific Harassment Protocol of Línea Directa Group, which has a specific information channel for such matters.

If the information received through the company's information systems could constitute conduct defined in the Criminal Code, the processing and resolution of these reports will be coordinated between the Ethics Manager and the People and Communication Area.

9. Specific procedure for the prevention of criminal offences

When possible criminal offences are brought to light through the Ethics Channel, the Ethics Manager may seek the collaboration of the company's legal departments (Labour, Tax, Data, Legal Counsel, Corporate Governance or Regulatory) as required by the nature of the possible offence, resolving it with their collaboration and in accordance with the provisions of the Criminal Compliance Policy.

When the events could constitute a criminal offence, the information will be immediately forwarded to the Public Prosecutor's Office. In the event that the incident affects the financial interests of the European Union, it shall be referred to the European Public Prosecutor's Office. All of the above is without prejudice to the right of defence or the right not to confess guilt, as the case may be.

10. Coordination for handling reports received through other internal channels

In addition to the previously mentioned Ethics Channel, which is accessible to everyone, LINEA DIRECTA has, for the exclusive access of employees, a series of lines of communication with the Ethics Channel:

- **Human Resources Consultations / Employee Channel** available on the intranet: this is a channel for communicating and enquiring about doubts or incidents relating to the employment relationship (absences, leave, payroll, etc.).

- **Internal channel for reporting workplace harassment**, governed by the Protocol for Prevention and Action in Situations of Psychosocial Risks: this is a channel structured as a system for resolving disputes between employees, with an internal investigation for the purpose of disciplinary action.

In the event that a report is received through any of these channels on issues that must be managed in accordance with the Ethics Channel Policy – and, in particular, on facts that could constitute a crime or any other breach of regulations – the report will be forwarded for management through the Ethics Channel.

11. Guarantee of no reprisal against whistleblowers

LINEA DIRECTA will not tolerate any reprisal against any employee who raises a compliance breach or concern in good faith, regardless of whether the problem is ultimately deemed a matter to be addressed.

If an employee believes that they are suffering any reprisals for having used the Ethics Channel, they should report it to the Ethics Manager, indicating the original incident reported in order to investigate what happened and take appropriate action.

12. Personal data processing and storage of documentation

Personal data will be treated with the utmost confidentiality throughout the entire process of managing Ethics Channel reports. In this regard, it should be noted that if the user considers it appropriate, they can submit a report while maintaining their anonymity.

Likewise, only the Ethics Manager, who will handle the report with the direct support of Corporate Governance, and the remaining authorised individuals will have access to the personal data included in the Channel, in accordance with article 32.1 of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

In any case, at the time of data collection, users will be informed of the processing of their personal data via the corresponding clause. Users of the channel will also be expressly informed that their identity will in all cases be kept confidential and will not be communicated to the individuals involved in the incidents in question or to third parties.

Likewise, it is guaranteed that the identity of the whistleblower will never be subject to the right of access to personal data and the possibility of communication of said identity is limited only to the judicial authority, the Public Prosecutor's Office or the competent administrative authority.

The data processed will be kept in the information system (Ethics Channel) only for the time necessary to decide whether or not to initiate an investigation into the events reported.

If it is confirmed that the information or part of the information provided is not truthful, it shall be deleted immediately, unless the lack of truthfulness may constitute a criminal offence, in which case the information shall be kept for the time necessary during the legal proceedings.

In any case, if three months have elapsed since receipt of the report and no investigation has been initiated, the information shall be deleted, except when its retention is necessary to provide evidence of the system's operation.

Reports that have not been processed may only be recorded anonymously, and the obligation to block them, provided for in article 32 of Organic Law 3/2018 of 5 December, shall not apply.

Línea Directa will file and keep the information received and the internal investigations that have been carried out in the corresponding record book, guaranteeing, in all cases, the confidentiality requirements provided for in said law.

This record will not be public, and only at the reasoned request of the competent judicial authority, by means of an order, and within the framework of a judicial procedure and under its supervision, will it be possible to access all or part of the content of the record.

The personal data relating to the information received and to the internal investigations referred to in the previous paragraph shall only be kept for such period as is necessary and appropriate for the purposes of complying with the applicable regulations.

13. Approval and implementation

This Policy has been approved by the board of directors at its meeting held on 20 April 2023 and is effective from the moment of its approval.

The content of this document shall be updated and revised regularly, as well as when there are regulatory changes that affect its content, following the same procedure as when it was drawn up, and it shall be published on the intranet and on the corporate website. (www.lineadirectaaseguradora.com)