



RavenPack

Whistleblowing Procedure

Internal Information System

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Whistleblowing Procedure

Internal Information System

Introduction

The purpose of this document is to describe the Internal Information System hereinafter (“IIS”) Procedure in accordance with the legal requirements established in Article 9 of Law 2/2023, regarding the phases of receiving communications, instruction, and conclusion of the procedure.

This procedure is part of the IIS of RavenPack, which is the preferred channel for reporting actions or omissions specified in Article 2 of Law 2/2023, within the scope of RavenPack. It is preferred that the information about irregular practices is known by us to correct or repair the damages as soon as possible, provided the infringement can be effectively addressed.

The IIS integrates the internal channel of RavenPack, the person responsible for the IIS, and the IIS Procedure.

The Legal Counsel is assigned by RavenPack, as the Whistleblowing Officer, and will ensure that the communications received in it are processed diligently.

Initiating a procedure

Forms of Information Submission

The IIS of RavenPack ensures the confidentiality of data related to the informant and any person mentioned in the provided information, even allowing the submission and subsequent processing of anonymous communications.

Written

Via email in writing to whistle@ravenpack.com

Via post by sending the documentation in a sealed envelope to the following postal address:

Atte. Legal Counsel
Centro Negocios Oasis, Local 8, Ctra Nacional 340, KM 176
RavenPack
Marbella, Malaga 29602
Spain

In person - remote meeting

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In person, upon request of the whistleblower by holding a meeting for this purpose within a maximum period of seven days. The meeting can be in person at RavenPack's facilities or remotely via online conference.

In this case, the communication must be documented through a recording in a secure, durable, and accessible format or by transcribing the complete and accurate content of the conversation, with the prior consent of the informant. The informant will be given the opportunity to verify, correct, and accept the transcription of the message by signing it.

In all cases where communications are made, information on the processing of personal data will be provided to the informant, regarding the protection of individuals concerning the processing of personal data and the free movement of such data.

Content of the Communication

The communication submitted must include the maximum number of known details necessary for the identification of individuals to whom the information refers, as well as the behaviors contrary to legal provisions attributed to them. In particular, the following information should be provided:

- Full name, ID number (if known), workplace, functional area, job position, location where they perform their duties, and any other available data that allows for clear and unequivocal identification of the person about whom information is being reported.
- Detailed description of the actions and behaviors performed that may constitute any type of violation and about which information is intended to be reported. Documentation available to substantiate these facts should be provided.
- If applicable, an indication of the employment or professional relationship that links the informant with RavenPack, for the purpose of applying the protection measures.
- Any other facts that may be considered appropriate or relevant.

When making the communication, the informant may specify an address, email, or secure location for receiving notifications. The informant may also expressly waive receiving any communication regarding actions taken as a result of the provided information.

Communication Registration and Acknowledgment of Receipt

Once the communication is submitted, it will be registered in the IIS by personnel expressly authorized by the person in charge of the system to access it. This registry is not public, and

access to its content, either in full or in part, can only be granted upon reasoned request by a judicial authority and under its supervision.

Furthermore, it is necessary to acknowledge receipt of the received communication to the informant within 7 natural days following its reception through the same means by which the communication was received, unless doing so could jeopardize the confidentiality of the communication.

In any case, if the information was presented verbally, the record mentioned in the previous section will have the same effect as the acknowledgment of receipt, and the issuance of the latter will not be necessary.

In all cases, a registration number associated with the report will be generated, allowing the informant to track the corresponding process and, if necessary, receive communications or provide new information.

An acknowledgment of receipt will be sent through the same means. In the case of reports submitted by postal mail, the acknowledgment of receipt will be communicated to the informant through postal notification to the provided address.

Acceptance of communications

Once the information is received, within 10 business days from its registration, a preliminary analysis will be conducted to verify whether it exposes facts or behaviors within the scope of Law 2/2023. The result of this preliminary analysis will be:

Rejection of the communication

Rejection will occur in the following cases:

- When the informant is not within the subjective scope defined in Article 3 of Law 2/2023.
- When the reported facts lack credibility or foundation, or there are, according to the Whistleblower Officer, reasonable indications that the communication has been obtained through the commission of a crime. In this case, in addition to rejection, a detailed report of the facts considered constitutive of a crime will be forwarded to the Public Prosecutor.
- When the reported facts do not constitute a violation of the legal system.
- When the communication does not contain new and significant information about violations compared to a previous communication for which the corresponding procedures have concluded, unless new factual or legal circumstances justify a different follow-up.

In these cases, the Whistleblower Officer will notify the decision with reasons. Rejection will be communicated to the informant unless the communication was anonymous or the informant had waived receiving communications. Rejection will result in the conclusion of the procedure.

Admission for processing of the communication

Admission for processing of the communication will be communicated to the informant, except when the information is anonymous or when the informant has waived receiving communications.

Referral

Immediate referral of the communication to the Public Prosecutor when the facts could be indicative of a crime or to the European Public Prosecutor if the facts affect the financial interests of the European Union.

Referral of the communication to the authority, entity, or organization deemed competent for processing.

Admitted communications - process

Once the communication is admitted for processing, the Whistleblower Officer will conduct the procedure. The instructional phase will encompass all actions aimed at verifying the credibility of the reported facts, including but not limited to:

- Inspection visits, data analysis, studies, and any informative actions deemed appropriate.
- Gathering all necessary background, reports, documents, files, and data for effective development.
- Providing a hearing opportunity to the individual, body, or unit affected by the information.

To ensure the right to defense and with absolute respect for the presumption of innocence, the affected person will have access to the file, ensuring that any data that could identify the informant is not revealed. The affected person may be heard at any time and will be informed of the possibility to appear with legal representation.

Completion of procedure

Once all investigative actions are completed, the Whistleblower Officer will issue a proposal report with the following content:

- An exposition of the reported facts along with the communication identification code and the registration date.
- The classification of the communication to determine its priority or lack thereof in processing.

- The actions taken to clarify the facts.
- The conclusions reached in the instruction and the assessment of the measures and evidence supporting them, indicating the proposed actions to be taken.

Following this report, the Whistleblower Officer will make one of the following decisions:

Closure of the file

This decision will be notified to the informant and, if applicable, to the affected person. In these cases, the informant has the right to the protection provided by this law, unless, as a result of the actions taken during the instructional phase, it is concluded that, based on the gathered information, the communication should have been rejected due to one of the reasons outlined in the procedure.

Referral

In case that, despite not initially observing indications that the facts may constitute a crime, this becomes apparent during the course of the instruction. If the crime affects the financial interests of the European Union, it will be referred to the European Public Prosecutor.

Referral of the communication to the authority, entity, or organization deemed competent for processing.

Internal measures

Order RavenPack to take those internal changes / measures that the nature of the facts and actions so determine.

All decisions made shall be communicated to the Whistleblower.

Maximum Duration of the Procedure

The maximum duration of the procedure shall not exceed 3 months from the date of sending the acknowledgment of receipt or, if not sent, from the expiration of seven natural days from the submission of the communication, except in cases of special complexity that require an extension of the period.

In such cases, the period may be extended for a maximum of an additional three months.