

1. Introduction and object

In the framework of the ethical and transparency model of Hotel Montera 47, S.L., everyone who works for the company must maintain integrity and comply with the internal rules that have been established, and cooperate to prevent any irregularity or illegal act.

To this end, a Whistleblowing Channel has been set up on the hotel's website which can be accessed from the section "whistleblowing channel".

These Regulations regulate the operation of the Whistleblowing Channel, and the guarantees, terms and conditions of its use by whistleblowers.

Management of the channel is governed by the principles of respect, confidentiality of the data submitted and the statements made. Any decisions made after receiving information will therefore be made in a reasoned manner and taking into account the circumstances of the facts reports, and the rights and duties of the whistleblower and the affected persons.

The whistleblower protection measures may be implemented by the company once the breach has been reported to the Whistleblowing Channel.

Hotel Montera 47, S.L. reserves the right to modify the contents of these Regulations at any time and with no need for prior notice.

2. Who can use the whistleblowing channel?

Any employee or third party who is aware of any breach of the internal regulations may use the Whistleblowing Channel.

3. Objective scope

The irregularities that may be reported are as follows, and are detailed more extensively in the appendix to this document.

- Sexual harassment
- Discrimination
- Bullying
- Inappropriate conduct and other conflicts in the work setting
- Conflict of interests
- Privacy, information security, use of privileged information
- Working conditions
- Bribery and corruption
- Regulatory breach
- Health and safety
- Internal control over financial reporting, contracts or reports
- Breach of commitments with customers
- Protection of the environment
- Other

4. How to report concerns

Whistleblowers may report their concerns confidentially and/or anonymously using the form available in the whistleblowing channel section.

Reports made in bad faith will be the object of disciplinary action.

5. Processing of the report

All reports will be received by Hotel Management and Human Resources who will analyse the reports facts or indications and will decide whether or not to accept the complaint filed, informing the whistleblower at all times of the decision made.

6. Personal data protection

Information

All whistleblowers are hereby informed of how Hotel Montera 47, S.L. gathers, processes and protects that data provided using the whistleblowing channel.

Identification of the controller

Data controller: Hotel Montera 47, S.L.

Tax Identification Number: B67175208

Registered office: Pedro i Pons, 9-11 08034 Barcelona

For what purpose are data processed and for how long?

Data will be processed by Hotel Montera 47, S.L. for the following purposes:

- To manage the processing of the complaints submitted using the established procedure.
- To conduct the investigation of the events.
- To comply with the company's regulations and applicable legal obligations.

Once the complaint has been submitted, if the process does not advance the data are deleted after 3 months. In an investigation process is in progress, the data will be accessible for a maximum term of 5 years.

What is the legal basis for the data processing?

The principal basis for the data processing will be the consent given on submitting the complaint.

It is hereby expressly stated that the processing of personal data will conform to the guidelines and recommendations established in the applicable legislation.

To whom will be data be communicated?

The data may be communicated to:

- Public administrations
- Judges and courts
- State law enforcement agencies

Exercise of rights

At all times, whistleblowers will be entitled to enforce their rights of access, rectification, cancellation and objection and to obtain from Hotel Montera 47, S.L. the restriction of the processing of the data when any of the conditions established in data protection legislation is present and, as the case may be, to request the portability of their data. To exercise the aforesaid rights, whistleblowers may contact Hotel Montera 47, S.L. at the following e-mail address : protecciondatos@hotelmonteramadrid.com stating "Data Protection" as the subject and attaching a photocopy of their identity document.

Whistleblowers are also informed that they may at any time file a complaint concerning their personal data protection with the Spanish Data Protection Agency at Calle de Jorge Juan, 6, 28001 Madrid.

APPENDIX: IRREGULARITIES THAT CAN BE REPORTED

SEXUAL HARASSMENT

This refers to undesired conduct of a sexual nature that may be perceived as or cause offense or humiliation to a person. The conduct interferes with the work and creates an intimidated working environment.

It is distinguished from “harassment on account of sex” which is included as a form of discriminatory harassment.

DISCRIMINATION

Unfair treatment for reasons of ethnicity, religion, nationality, gender, age or any other social conditions, which may affect an individual or a group.

BULLYING

Any action of psychological harassment at work. It refers to recurring conduct that constitutes an attack against the worker’s dignity. This type of actions or comments annul the worker’s capacity, his or her continuity in the job or promotion, creating an unfavourable working environment.

INAPPROPRIATE CONDUCT AND OTHER CONFLICTS IN THE WORK SETTING

Abuse of power both by management or senior members of the company towards their subordinates and mistreatment of an employee occurring between individuals who do not have a hierarchical relationship or where, if one exists, it is not significant.

CONFLICT OF INTEREST

Situations in which an employee’s professional decisions are influenced by a personal interest, related to causes that the employees sees can limit or conditions his or her decisions, as well as begin related to or having a shareholding in companies that exercise a significant influence within the company.

PRIVACY, INFORMATION SECURITY, USE OF PRIVILEGED INFORMATION

Improper use of the information of the company, customers, employees or suppliers to one’s own benefit or to the benefit of third parties.

WORKING CONDITIONS

Errors in the employee remuneration process that are not associated to fraud. This include situations that entail a labour risk for the employee.

BRIBERY AND CORRUPTION

Conduct by employees of the company or third parties that consists of authorizing invitations or other types of incentives for the purpose of obtaining a benefit for the company. This involves giving or receiving something of value in order to influence the actions or decisions of a person, often in breach of the law or ethical rules.

REGULATORY BREACH

Any other breaches, intentional or otherwise, of local or corporate internal regulations not reflected in the preceding sections.

LACK OF INTEGRITY IN THE PRIVATE SPHERE

Conduct by employees of the company or third parties that consists of authorizing ore receiving invitations or other types of incentives from any person in the private sphere with the aim of obtaining a reward.

HEALTH AND SAFETY

Breach of occupational risk prevention procedures that are aimed at protecting employees' physical and mental integrity.

INTERNAL CONTROL OVER FINANCIAL REPORTING, CONTRACTS OR REPORTS

Accounting irregularities related to internal control over financing reporting or audit matters.

BREACH OF COMMITMENTS WITH CUSTOMERS

Breach of commitments undertaken with customers in relation to contracted services, billing, quality of products and services, etc. or malpractice contrary to the customer's interests.

PROTECTION OF THE ENVIRONMENT

Any conduct that causes substantial damage to the quality of air, soil, water or to animals and plants is considered to be a criminal offence against natural resources and the environment.

OTHER

Any other matters reported that cannot be assigned to any of the categories indicated above. As far as possible, attempts will be made to use this category as little as possible.