POLICY ON THE GENERAL PRINCIPLES OF THE WHISTLEBLOWING CHANNEL AND THE DEFENCE OF THE WHISTLEBLOWER

QUIRÓNSALUD GROUP

Scope of application	HELIOS HEALTHCARE SPAIN, S.L.U., and the rest of the Companies of its Group of companies as defined in Article 42 of the Spanish Commercial Code (hereinafter and indistinctly, the "**Quirónsalud Group**", "**Quirónsalud**" or the "**Group**").
Summary of the Policy	This Policy regulates the general principles that govern and are applicable to the procedure for handling complaints made through the Group's Whistleblowing Channel, as well as the whistleblower protection measures.
Approval	Board of Directors of HELIOS HEALTHCARE SPAIN, S.L.U., after consultation with the legal representation of the workers.
Supervisory Body	Risk and Compliance Committee of the Quirónsalud Group.
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1. INTRODUCTION

Quirónsalud is the **leading** Group in the provision of **health services** and **occupational risk prevention** in Spain. Integrated into the multinational Fresenius Group, together with "Helios" it forms the largest private hospital group in Europe and one of the leading in the world, managing, with an absolute commitment to health, as well as to the most comprehensive and highest quality care and attention, more than 100 health centers, mainly in Spain.

At Quirónsalud we are **committed to person-to-person health and safety**, with the best professionals in the services that cover all medical specialties, with the best techniques in diagnosis and treatment, and with the best technicians in occupational risk prevention, as well as with the highest standards in terms of **corporate social responsibility**.

Our values, reflected in our Code of Conduct and Ethics, imply a commitment to professional **integrity,** transparency**, respect for the law** and human rights**, in order to** offer the highest quality of services and care to our patients, generating relationships of trust, and collaborating in the improvement of the professional environment. social and ethical.

In this sense, each and every one of the people who work in Quirónsalud – the Professionals – must behave **honestly**, **comply with the laws and internal regulations –** especially our Code of Conduct and Ethics – in the development of their professional activities, cooperating to prevent anyone from acting incorrectly or without integrity.

We are aware that the inappropriate behavior of a single Professional can damage our **image and reputation** at any time. And even generate criminal liability for the companies that make up the Quirónsalud, as legal entities.

For this reason, at Quirónsalud we actively work to **prevent and avoid** the possibility of this happening.

In this regard, current legislation reinforces the need for companies to have control systems and mechanisms in place to prevent, detect and react to the risk of any of their members committing an irregular or criminal activity, even if it could benefit the organization.

For the effectiveness of these prevention systems, **the Whistleblowing Channel** plays a fundamental role, which allows us to comply with the legal obligation we have to report possible infractions and non-compliances. In line with our Ethics and Compliance Culture, this is expressly established in our Code of Conduct and Ethics, and in our Corporate Defense Model.

The Whistleblowing Channel that we have implemented at Quirónsalud is designed and regulated in such a way that the due conditions of **confidentiality, security and independence** are guaranteed at all times. In the same way, our Channel has a series of measures to **prevent the Whistleblower** - as defined in section 2 below - from **suffering any kind of retaliation** for the mere fact of having made a complaint.

The Whistleblowing Channel subject to this Policy is made available to our employees, collaborators and suppliers and, where appropriate, patients and customers, adapted to the guarantees of Law 2/2023, of 20 February, regulating the protection of people who report regulatory and anti-corruption breaches, as well as any other applicable law (hereinafter referred to as "Law of Whistleblower Protection"), since their cooperation is of great importance in detecting possible misconduct and breaches.

However, it is essential to point out that patients have their own, different and specific channel to channel their claims and complaints: the "Patient Care Service Channel".

2. OBJECT

The purpose of this Policy is to establish (i) **the general principles** applicable to the management of communications received through the Quirónsalud Whistleblowing Channel and (ii) **the protection guarantees** that assist persons who make use of the Whistleblowing Channel under the conditions defined below (hereinafter also referred to as the "**Whistleblowers**") and in accordance with Law of Whistleblower Protection.

Quirónsalud assumes the commitments established in this Policy and guarantees that all communications made through the Channel, as well as the people involved in the process, will be treated with the rigor and principles described below.

3. WHO CAN/SHOULD REPORT?

3.1. Quirónsalud Professionals can and should report

Quirónsalud Professionals, understood as employees, subcontracted workers (including personnel made available by ETT), interns, self-employed and/or self-employed persons hired by the Group, Directors, Attorneys-in-Fact, Administrators, Partners and Shareholders, **may** report when they suspect any alleged irregularity, act contrary to the law, integrity or internal rules - especially the Code of Conduct and Ethics -. On the other hand, Quirónsalud Professionals **have** the duty to report when they know with certainty one of the situations described.

Only in this way will it be possible for any suspicion or doubt of irregularity to be verified and, where appropriate, measures can be adopted by Quirónsalud to repair its consequences and prevent this irregularity from worsening or repeating itself in the future.

With everyone's **cooperation**, we improve the professional, social, ethical, environment and commitment to compliance with laws and regulations of Quirónsalud.

3.2. Outsiders can also report

Any person external to Quirónsalud, whether a patient, client, any person who works for (or under the supervision or direction) of a supplier, a subcontracted company, or other collaborators, as well as interns, candidates who are in a selection process and former employees, or any person who has a legitimate interest and in good faith, may report irregular conduct of which they are aware and which violates or has violated the regulations in force, the internal rules, their rights, those of Quirónsalud, its Professionals, or third parties related to the Group or its activity.

4. HOW CAN I REPORT AND WHAT ARE THE REQUIREMENTS FOR MY REPORT?

4.1. Ways to file a complaint

Complaints can be communicated in writing:

- By going to the **corporate website** www.quironsalud.es, accessing: https://www.quironsalud.com/en/group/whistleblowing-channel
- By post to the attention of the Compliance Department of the Quirónsalud Group, Calle Ramírez de Arellano, 21, 28043 - Madrid, including the mention "Confidential" on the envelope.
- By e-mail: canaldedenuncias@quironsalud.es, to the attention of the Compliance Department, including in the subject line of the e-mail the mention "Confidential".

Likewise, Quirónsalud informs that any interested person may report the facts described in section 5

below "What can I report?", through the **External Information Channels** of the Independent Authority for the Protection of Whistleblowers ("A.A.I."), indicated in Annex I, and those that may be created in the future.

4.2. Requirements to be met by the report

The filing of a complaint must meet the following formal requirements:

- Submit through one of the channels provided for in section 4.1.
- If the complaint has been submitted in writing (by e-mail or post), it must be submitted in accordance with the contents of the Form attached as Annex II.
- Attach all the information and evidence available to the Complainant.

It must also meet the following material requirements:

- It must be carried out in **good faith** and deal with true facts, and it is not admissible to communicate false information, in bad faith by the Complainant or with a clear intention to harm the person whose conduct is mentioned.
- "Good faith" in the communication will be considered if it has been honestly, completely and accurately reported, even in cases where it is later shown that the information was unsubstantiated, erroneous or misleading.
- Deal with the facts indicated in section "5. What can I report?" next.

5. WHAT CAN I REPORT?

5.1. Events that can be reported through the Channel

Through the Whistleblowing Channel, you can alert about facts, actions or omissions that are being carried out within Quirónsalud, and that may involve an incident, malpractice, irregularity or infringement of the Code of Conduct and Ethics or the Law, considering as such, any action or conduct, actual or potential, by a person who is part of Quirónsalud who:

- Is abusive, negligent or contrary to the law in force, and in particular, the infringements detailed in Annex III.
- It is contrary to the general principles of action and ethical values of mandatory compliance described in the Code of Conduct and Ethics, and in the rest of the internal regulations of the Quirónsalud Group.
- Poses a risk to the reputation and image of Quirónsalud.
- It may be considered incomplete or generate an ethical dilemma.

5.2. Events that are outside the scope of the Canal

Queries, suggestions or claims, for **example, complaints regarding patient/customer service** (https://www.quironsalud.com/es/grupo/experiencia-importa/canal-quejas-reclamaciones), or mere interpersonal conflicts in the workplace, are excluded from the scope of the Whistleblowing Channel, as there are other Channels suitable for its reception, management and treatment.

Communications received through the Whistleblowing Channel that are considered queries, suggestions or claims will be archived, informing the Complainant and indicating the specific and appropriate channel provided for this purpose: Patient Care Service, Complaints and Claims Channel, or other.

6. WHISTLEBLOWER PROTECTION PRINCIPLES

6.1. Confidentiality

Confidentiality is guaranteed in the management of the Whistleblowing Channel, so that it becomes a **secure** means of communication subject to strict rules of discretion, reserve and secrecy with respect to all aspects and in relation to all the persons involved and, in particular, with regard to the protection of the identity of the Whistleblower of the accused who, where appropriate, may become the subject of investigation, and of any person who is cited in the complaint.

On the other hand, and except in the legally established cases, the accused will not be provided with the identity of the Accused. Therefore, the exercise by the Accused of his/her right of access in the field of Data Protection (see section 11) will not imply access to the identity of the Complainant.

Access to the information contained in the Whistleblowing Channel is limited exclusively to persons with responsibilities and functions assigned to them in the management of complaints and in the processing of investigations, designated by Quirónsalud, who are subject to strict rules of confidentiality and obligation to maintain secrecy and who are **prohibited from** disclosing any type of information about complaints.

Quirónsalud will ensure compliance with the duty of confidentiality and will investigate and sanction any breach of this obligation by the persons designated by Quirónsalud and who have been assigned functions that involve access to the information contained in the complaints.

Notwithstanding the foregoing, in the event of acts constituting a criminal or administrative offence, this information may be provided to police, administrative or judicial authorities for the processing of the appropriate procedures within the framework of a criminal, disciplinary or sanctioning investigation.

In addition, when it is deemed appropriate to adopt disciplinary measures against a person who is part of Quirónsalud, this access will be allowed to personnel with managerial and executive functions in the corresponding Human Resources Area.

6.2. Anonymity and non-traceability

For whistleblowers who prefer it, Quirónsalud's Whistleblowing Channel contemplates the possibility of making anonymous communications, for which the provision of identification or contact data is not required.

To this end, persons who wish to report presumably irregular events and who wish to remain anonymous may do so by filling in only mandatory **data** necessary to **initiate** the corresponding **investigation**.

Quirónsalud guarantees that **no anonymous complaint will be tracked.**

6.3. Independence

The actions derived from the information disclosed by the Complainant will be managed by the Body designated by Quirónsalud, in an equitable, integral, objective, independent and honest manner.

The body appointed by Quirónsalud may be internal to the organization itself, or external (expert in the field), to promote greater independence, objectivity and impartiality in the management of communications.

In any case, Quirónsalud guarantees **independence**, **impartiality** and the absence of conflicts of interest in all phases of the complaints management process and internal investigations.

6.4. Comprehensiveness and motivation

Quirónsalud will carry out an exhaustive and complete analysis of the facts and circumstances communicated through the Complaints Channel, **avoiding** any **arbitrariness**.

In this sense, each and every one of the communications received will be resolved, in a justified and reasoned manner.

6.5. Information on the status of the procedure

The Whistleblower, whether they choose to identify themselves or opt for anonymity, may obtain and consult the following information, by means of an access code that will be provided automatically, when accessing the Quirónsalud Whistleblowing Channel:

- Access the report on your complaint;
- Check the status of your report;
- Contact the body in charge of handling your complaint;
- Read the communications of the body responsible for handling your complaint;
- Provide more information when sending messages or tracking files.

6.6. Prohibition of Retaliation

Quirónsalud expressly prohibits any type of retaliation, negative consequence, threat of retaliation or attempts at retaliation against the Whistleblower in good faith who reports through the Whistleblowing Channel, for the mere fact of making a complaint.

For these purposes, "retaliation" is understood to mean any act or omission prohibited by law or which, directly or indirectly, entails unfavorable treatment that places the person who suffers it at a particular disadvantage with respect to another in the work or professional context, solely because of his or her status as a Whistleblower.

As a consequence of the above, anyone who files a complaint complying with the requirements of section 4.2 above will be protected against any type of retaliation, discrimination and penalization motivated by its submission.

By way of example, the following behaviors will be considered retaliation:

- Suspension of the employment contract, dismissal, non-renewal, or early termination of a temporary employment contract after the probationary period has passed.

- Early termination or cancellation of contracts for goods or services.

- Imposition of any disciplinary measures, demotion or denial of promotions and any other substantial modification of working conditions.

- Damages, including reputational damages, financial loss, coercion, intimidation or harassment.

- Denial of training.

- Discrimination, or unfavorable or unfair treatment.

Quirónsalud will apply the support and protection measures against retaliation provided for in articles 36, 37 and 38 of Spanish Law of Whistleblower Protection, as well as any other applicable law, offering free information and advice, on the procedures and resources available, protection against reprisals and the rights of the affected person.

The protection measures for the Whistleblower shall be extended, where appropriate, to:

- If the Complainant is an employee of Quirónsalud, to the persons of the organization who, in compliance with their statutory duties, assist them in the process of managing the complaint and investigation;

- Persons who are related to the Complainant and who may suffer retaliation, such as Department colleagues or family members of the Complainant;

- To those natural persons who, due to their close relationship with the Complainant, may influence or condition them when it comes to filing a complaint and providing information and possible means of evidence, and

- Companies for which the Complainant works or with which he or she has any other type of relationship in an employment context or in which the Whistleblower has a significant stake.

7. CONDITIONS FOR PROTECTION

To the persons referred to in section 6.3. The protection regime provided for in this Policy shall apply to them provided that:

- The complaint has been submitted in compliance with the formal and material requirements (section 4.2) provided for in this Policy;

- Quirónsalud has reasonable grounds to believe that the information reported is true at the time the complaint was filed, even if the Complainant has not been able to provide conclusive evidence, and

- The complaint falls within the scope of the "Facts reportable through the Channel" (section 5.1.)

On the other hand, Whistleblowers who report the following are expressly excluded from protection:

- Information that is already fully available to the public;
- Complaints that are inadmissible;
- Information related to interpersonal conflicts that are not serious for legal purposes[1], and that affect only the complainant and the accused;
- Information on events that are outside the scope of the Canal (section 5.2).

In addition, Quirónsalud will not tolerate the presentation of false complaints, with absolute disregard

[1] *For the appropriate purposes, it is stated that the facts that may constitute a situation of workplace or sexual harassment are not considered interpersonal conflicts and, therefore, the Complainants who report this type of situation (Annex III – Conducts that must be reported), will be within the scope of protection of this Policy and the Law.*

for the truth, bad faith or abuse of rights.

For this reason, in the event that the internal investigation determines that the complaint was false and that the Complainant was aware of its falsity, thus acting in bad faith, he or she will not be covered by the protection measures described in section 6.3, and this action may constitute a serious infraction that may be subject to disciplinary measures and/or sanctions by Quirónsalud without prejudice to the labor, administrative or criminal responsibilities[2] provided for by the legal system, including the labor disciplinary regime.

8. PROCEDURE FOR THE MANAGEMENT AND INVESTIGATION OF COMPLAINTS

8.1. Acknowledgment of receipt and registration

The acknowledgement of receipt of the complaint will be made within a maximum period **of seven (7)** days[3] from the receipt of the same, provided that the Complainant has provided a secure and reliable means of communication and has provided[4] data that ensures that he or she will be the sole recipient of the information.

The files arising from the processing of complaints will be documented and registered with an individual reference number, and security measures will be applied for the custody, archiving, access, reproduction and distribution of the information, which will be considered confidential.

8.2. Preliminary Analysis of the Complaint

A preliminary analysis will be carried out, the purpose of which is to determine whether the complaint:

- **Inadmissible**, when:
    - The complaint does not comply with the formal or material requirements set out in section 4.2. of this Policy;
    - The facts denounced lack a minimum of credibility;
    - The complaint is unfounded;
    - There are reasonable indications that the information provided with the complaint has been obtained through the commission of a crime;
    - The complaint does not provide new and significant information with respect to a previous complaint that has already been concluded (unless the legal situation has changed, or there is some new fact of sufficient relevance).

In such a case, the report will be archived and a communication will be sent to the Complainant, provided that the Complainant has identified himself and has not opted for anonymity, informing him of said decision, and the personal data contained therein will be deleted or anonymized. Where applicable, the Complainant will be redirected to the appropriate channel.

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[2] *In accordance with the provisions of article 456 et seq. of the Spanish Penal Code, accusation, false reporting and simulation of crimes are considered to be criminal offences and are punishable by imprisonment for up to two years.*

[3] *When this Policy specifies a period of days, unless expressly stated otherwise, it will be understood that they are calendar days, that is, including Saturdays, Sundays and holidays.*

[4] *The use of a generic email address, which may be accessed by more than one user, or an excessively generic postal address will not be considered safe or reliable.*

- **It is admitted:** it is considered relevant, in which case a communication will be sent to the Complainant informing him of the opening of the investigation file. In this case, if additional information is necessary to investigate the complaint, it will be requested prior to investigating the file. If necessary, the adoption of precautionary measures will be proposed in order to protect the Whistleblower and/or prevent the recurrence of the irregular behavior. In any case, the measures must be justified, reasoned and proportionate.

In any of the above cases, the reasons that have led to the file being archived or admitted must be adequately documented and justified.

8.3. Categorization and assignment of Investigator/Investigator Body

When the Complaint is considered relevant, it will be categorized according to its subject matter and assigned to the Investigating Body in charge of carrying out the investigative steps.

8.4. Procedure for complaints sent by e-mail or post

In the event of complaints sent to the Compliance Department of Grupo Quirónsalud, by email or postal mail, i.e., by a means other than the Complaints Channel, the procedure will be as indicated below:

- The Compliance Department of Quirónsalud will proceed in accordance with the provisions of sections 8.1 and 8.2 above.

- Complaints that constitute a low or medium risk for the organization will be entered by Quirónsalud's own Compliance Directorate in the Complaints Channel for ordinary management and will be categorized and assigned to the Investigating Body, as indicated in section 8.3 above.

- Complaints that constitute a high or critical risk[5] to the organization will be immediately raised to the responsible and competent bodies in Compliance matters of the multinational Fresenius Group, who will assign the Investigating Body in charge of carrying out the investigative proceedings.

8.5. Processing of the Investigation File

The processing of the file shall be carried out within **a period not exceeding three (3) months** from the acknowledgement of receipt of the complaint or, if such acknowledgement has not occurred (due to the failure of the Complainant to provide) a secure and reliable means of communication, from the expiry of the period of seven (7) days from the receipt of the complaint, except when this period is insufficient to carry out an adequate investigation of the facts, in which case it may be extended up to a maximum of three (3) additional months.

The extension of the investigation period beyond the initial three (3) months must be duly motivated and justified in writing by the Investigating Body.

The objective of the investigation will be to clarify the events that occurred, identify those responsible and determine whether there are indications of irregular, illicit or criminal action. The internal investigation will be based on the principles of accountability and transparency, the right to defence and adversarial proceedings, and under a strict regime of confidentiality.

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[5] *For the purposes of this Policy, a high or critical risk to the organization shall be deemed to exist when the report: (i) may have an impact on Helios Healthcare GmbH or any company of the Helios/Fresenius Group; (ii) affects any member of the Risk and Compliance Committee of the Quirónsalud Group, or of any of its Governing Bodies.*

8.6. Conclusions of the Research

Once the investigation has been completed, the Investigating Body will prepare a **Report of Conclusions**.

The Conclusions Report shall contain:

- A statement of the facts related in the complaint identified with the individual reference number, and the date of registration.
- The steps taken and the means adopted to clarify the facts.
- Analysis of the information, documentation and evidence provided with the complaint, of those collected by the Investigating Body during the investigation, and of those provided by the Accused, as well as witnesses, if applicable.
- Assessment of the allegations made by the Accused in the hearing process.
- The facts considered proven and/or evidence and/or indications that have been revealed, of the tests and diligences carried out during the investigation.
- Possible breaches committed.
- The conclusions reached by the Investigating Body based on the assessment of the proceedings and evidence carried out and the evidence that supports them.
- The proposal of measures to be adopted, whether disciplinary, corrective or preventive.

8.7. Information for Whistleblowers and Accused

The outcome of the Report of Conclusions prepared by the Investigating Body shall be reported to:

- Whistleblower, provided that you have not opted for anonymity, or that you have opted out of receiving communications.
- Accused regarding the content of the resolution and the sanctioning or corrective measures adopted, where appropriate, with the guarantees of confidentiality and data protection that correspond by law.

Finally, the Investigating Body will mark the Complaint as "*Resolved*", download the content in a location other than the Channel and proceed to anonymize it, trying to offer a reasonable margin for the Complainant to have accessed the Channel to review the news.

9. WHAT RIGHTS DO I HAVE IF I AM ACCUSED?

The protection of the Accused, who may become a subject to investigation if the accused is admitted as pertinent and an investigation is initiated, is based, on the part of Quirónsalud, in addition to the application of discretion and confidentiality measures both with respect to their identity and with respect to the process itself, on the following **principles**:

9.1. Information

The Accused and persons who may be affected by an internal investigation have the right to be **informed of the actions or omissions attributed to them,** respecting, in all cases, the right to

honor and the presumption of innocence.

This hearing procedure will take place in the time and manner deemed appropriate to ensure the successful completion of the investigation.

9.2. Presumption of innocence and principle of defense and adversarial proceedings

In the processing of complaints and in carrying out internal investigations, Quirónsalud will respect at all times the rights of the Accused and the Investigated, in particular, the presumption of innocence and the principle of defense and contradiction, being able to formulate the **allegations and provide the evidence they consider appropriate in their defense**.

9.3. Legality of the proceedings

Any action by Quirónsalud will be carried out in strict compliance with the **law**, so that it is possible to contribute to an administrative or judicial procedure if necessary.

10. WHO IS RESPONSIBLE FOR THE WHISTLEBLOWING CHANNEL?

The Responsible for the Whistleblowing Channel, the Internal Investigations arising from the reported facts and the application and compliance with the Principles described in this Policy, is the Risk and Compliance Committee, which is the Body that oversees regulatory compliance and good practices in Quirónsalud, and which is made up of management personnel from all the Group's business areas.

11. DATA PROTECTION

11.1. Compliance with applicable Data Protection regulations

In the use of the Whistleblowing Channel, Quirónsalud guarantees full compliance with the applicable regulations on data protection. In particular, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and its implementing legislation, as well as any other regulations that may be applicable by virtue of the geographical area in which we are located.

11.2. Relevance, purpose limitation and data minimization

Personal data shall not be collected if it is not manifestly relevant for the purpose of processing specific information or, if collected by accident, shall be deleted without undue delay, and secure and appropriate deletion systems must be provided.

Under no circumstances will personal data that is not necessary for the knowledge and investigation of the reported facts be processed, proceeding, where appropriate, to their immediate deletion.

If the information received contains personal data included in the special categories of data, it will be immediately deleted, without being recorded and processed.

11.3. Limitation of the period of data retention

Personal data relating to the information received and investigations will only be kept for the period necessary and provided for the purposes of complying with Law of Whistleblower Protection. In any case, the data will not be kept for a period of more than ten years.

The data that is subject to processing may be kept in the information system of Grupo Quirónsalud only for the time necessary to decide on the admissibility of initiating an investigation into the facts

reported. If it is proven that the information provided or part of it is not truthful, it must be immediately deleted as soon as this circumstance becomes known, unless such lack of veracity may constitute a criminal offence, in which case the information will be kept for the necessary time during which the legal proceedings are being conducted.

If three months have elapsed since receipt of the communication and no investigation proceedings have been initiated, it will be deleted, unless the purpose of the retention is to provide evidence of the operation of the system. Communications that have not been processed will only be recorded in **anonymized** form, without the blocking obligation provided for in article 32 of the General Data Protection Regulation (GDPR) of the European Union.

ANNEX I – List of External Information Channels

• National Anti-Fraud Coordination Service Channel

https://www.igae.pap.hacienda.gob.es/sitios/igae/es-ES/snca/Paginas/ComunicacionSNCA.aspx

• Anti-fraud mailbox - Whistleblowing channel of the Recovery and Resilience Facility

https://planderecuperacion.gob.es/buzon-antifraude-canal-de-denuncias-del-mecanismo-para-la-recuperacion-y-resiliencia

• Anti-Fraud Office of Catalonia

https://seuelectronica.antifrau.cat/es/denuncia.html

• Andalusian Anti-Fraud Office

https://buzon.antifraudeandalucia.es/#/

• Whistleblowing channel of the transparency and open government portal of the Xunta de Galicia

https://transparencia.xunta.gal/canle-de-denuncias?langId=es_ES

• Cantabria Citizen Service Office

https://www.federcantabria.es/prevencion-del-riesgo-de-fraude

• Whistleblowing channel of the Government of Aragon

https://www.aragon.es/-/next-generation-eu-antifraude

• Anti-corruption channel of the Principality of Asturias

https://transparencia.asturias.es/detalle/-/categories/

• Office for the Prevention and Fight against Corruption in the Balearic Islands

https://www.oaib.es/denuncias/

• Municipal Office against Fraud and Corruption of the Community of Madrid

https://www.madrid.es/portales/munimadrid/es/Inicio/El-Ayuntamiento/Denuncias

• Agency for the Prevention and Fight against Fraud and Corruption of the Valencian Community

https://www.antifraucv.es/buzon-de-denuncias

ANNEX II – Form for the submission of Complaints by post or e-mail

Complainant's first and last name (optional)

Address or means for the purpose of notification chosen by the complainant (e-mail, post, telephone)

Relationship the whistleblower has with the Group (e.g., employee, supplier, contractor, patient, customer, etc.)

If you are an employee, please indicate the Department or Area to which you belong (optional)

Name and surname of the person accused

Department/Area to which the accused belongs

Description of the facts

If applicable, attach the supporting documentation on which the complaint is based

☐ I declare that I make this communication in good faith and for facts of which I have become aware, directly or indirectly, without prejudice to the possible lack of evidence, or any possible error, inaccuracy or omission that I may commit involuntarily.

Information on data protection

The personal data provided through this whistleblowing channel will be processed by the Quirónsalud Group as a legally responsible entity, in compliance with the legal obligations derived from the Law on the Protection of Whistleblowers and to try to prevent the commission of possible criminal activities. The persons involved may exercise their rights of access, rectification, deletion, limitation of processing or opposition, in the terms established by law, by contacting dpo@quironsalud.es. For more legal information, you can consult the Privacy Policy of the Whistleblowing Channel, available on our website and on the corporate intranet, or request it through the same email address.

ANNEX III – Conduct that is the subject of the Channel

The Quirónsalud Whistleblowing Channel will be subject to conduct (by action or omission) that may constitute:

1. **Violations of Grupo Quirónsalud's Code of Conduct and Ethics (by way of example, but not limited to):**[6]
    - Compliance with Law and Regulations
    - Health & Safety
    - Quality of care
    - Competence
    - Intellectual property
    - Asset Protection
    - Data protection
    - Use of systems
    - Financial and non-financial information
    - Anticorruption
    - Money Laundering
    - Tax Compliance
    - Collaboration with authorities

2. **Violations of regulations in the workplace, such as (but not limited to):**[7]
    - Workplace Harassment
    - Sexual and gender-based harassment
    - Occupational Violence
    - Discrimination and favourable treatment
    - Occupational safety and health
    - Conflict of Interest

3. **Infringements of European Union law where:**

    - Any of the matters listed in Annex I to Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law ("Whistleblowing Directive"), for information purposes and not limited to, those relating to the following matters:

        - Quality and safety of organs and substances of human origin, and in particular.
        - Quality and safety of medicines and medical products.
        - Patients' rights.
        - Public procurement
        - Food Safety
        - Public health

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[6] See "*Code of Ethics and Conduct of Grupo Quironsalud".*

[7] Within the labor regulations and due to the statute of limitations, behaviors that may constitute a violation of working conditions will not be subject to the channel. In these cases, the informant will be accompanied so that he/she can contact the person(s) of reference of the Department of People.

- Alteration of prices in public tenders and auctions
- Financial Services, Products and Markets
- Product Safety & Compliance
- Environmental protection
- Consumer protection
- Protection of privacy and personal data, and security of networks and information systems
- Other human rights that have no place in the above violations

- They affect the financial interests of the European Union.

- Affect the internal market, including infringements of European Union competition and aid rules granted by States, as well as infringements relating to the internal market in relation to acts infringing corporate income tax rules or practices intended to obtain a tax advantage which distorts the object or purpose of the legislation applicable to corporation tax.

4. Serious or very serious criminal or administrative offences, especially those involving financial loss for the Tax Agency and Social Security.

5. Offences that may constitute an offence that gives rise to the criminal liability of the legal person (by way of example, but not limited to):

- Illegal trafficking in human organs
- Genetic manipulation
- Against personal and family privacy
- Against workers' rights
- Sexual harassment.
- Discovery and disclosure of secrets and computer break-in
- Swindle
- Frustration of execution
- Punishable insolvencies
- Computer damage
- Relating to intellectual and industrial property
- Disclosure of company secrets
- Misleading Advertising
- Alteration of prices in public tenders and auctions
- Public health
- Corruption in business
- Money laundering and terrorist financing
- Illegal financing of political parties
- Fraud against the Public Treasury
- Social Security Fraud
- Grant fraud
- Relating to non-compliance and misrepresentation of accounting obligations
- Fraud on the general budgets of the European Union
- Obstruction of inspection activity

- Against spatial planning
- Risk from explosives and other agents
- Relating to nuclear energy and ionizing radiation
- Against natural resources and the environment
- Bribery
- Influence peddling
- Corruption of officials
- Smuggling

6. Violations related to Human Rights, linked to, among others:

- Child labor
- Forced labour and/or slavery
- Discrimination and respect for equal treatment
- Occupational safety and health
- Freedom of association
- Fair remuneration
- Abuse of power
- Unlawful eviction
- Environmental damage