

# Frequently Asked Questions (FAQs)

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### **What is the Whistleblower Channel?**

The whistleblowing channel is the tool that allows the confidential and secure reporting of any irregular conduct that may be occurring in the organization, such as, for example, acts against the law, against the code of ethics, against internal rules or the violation of human rights and environmental rights.

### **Who can use the Whistleblower Channel?**

Any Quirónsalud professional, as well as any third party (patient, client, supplier, interns, etc.) who has a legitimate and bona fide interest. Professionals include all persons with employment, professional or commercial ties to the Quirónsalud Group, as well as those who have already completed such relationship or are in selection processes, internships or training periods.

In the case of user claims related to complaints and claims or suggestions, there are other channels open to the public to submit such requests.

### **What can I report via the Whistleblower Channel?**

- 1) Those facts, actions and omissions that are being carried out within the company and that may involve an incident, malpractice, irregularity or breach of the provisions of [the Code of Conduct and Ethics of Quirónsalud](#) or the Law.
- 2) All violations of human and environmental rights which are summarized in our [group human rights statement](#).
- 3) Those criminal offences established in the Spanish Criminal Code that are carried out by a legal representative or employee, for the direct or indirect benefit of the Group, such as: offences against personal and family, fraud, punishable insolvency, computer damage, intellectual property, company secrets, misleading advertising, corruption, money laundering, fraud, fraud against public administrations, false accounting, etc.

If you witness or have knowledge of criminal acts in the course of your professional activity, you can submit a complaint via this channel. Please include as much information as possible in your notification. It is helpful if you consider the following questions when submitting your report:

- What happened?
- When did it happen?
- Who is involved or affected?
- Where did the incident take place?

Please note: raising allegations against someone can lead to serious consequences for that person. The Whistleblower Channel should therefore be used responsibly. A reporter is urged to only pass on such information that – to the reporter's best knowledge – is known to be true. Bad faith reports and knowingly providing false information can be punished by criminal and labor law.

In the case of user claims related to [complaints and claims or suggestions](#) regarding the service received, there are other channels open to the public to submit such requests, which are handled with the same guarantees with which Complaints are investigated.

The Whistleblower Channel is not suitable for reporting emergencies. In the event of acute danger, please contact the general emergency services.

### ***Do complainants need to verify the information submitted in advance?***

Reports of a possible violation must be based on reasonable suspicion. This means that there are clear signs or evidence of a violation or that the complainant has personally observed statements or actions. Pure hearsay is generally not sufficient. If you are unsure whether a behavior constitutes a violation, please contact the Compliance function.

### ***Who receives and investigates my complaint?***

The complaint is received by the Whistleblower Channel manager as soon as it is filed by the complainant. An acknowledgement of receipt of the complaint will be sent to the complainant within seven (7) days.

The Whistleblower Channel manager performs an initial analysis of its content and, if it meets the requirements for it to be admitted, assigns the corresponding investigative body (depending on the subject matter and company affected) to investigate the facts and issue the subsequent conclusions report. Once the conclusions report has been issued, if it is considered that a possible infraction or non-compliance has been committed, it is transferred to the competent body (Group Compliance Committee/Group Executives and Group Management) so that the latter may adopt the appropriate corrective measures, if any. The complainant will receive feedback on the status of the investigation within three (3) months of confirmation of receipt.

Your report will be treated confidentially at all times.

### ***What principles are observed when processing a Complaint?***

Every whistleblower shall be protected by the following principles:

- **Confidentiality:** absolute confidentiality is guaranteed in the handling of complaints, with respect to all aspects and in relation to all persons involved in the same, especially with regard to the protection of the identity of the complainant.
- **Anonymity and non-traceability:** it is recognized the possibility of filing completely anonymous complaints, for which no identification or contact information will be required. Furthermore, it is guaranteed that no anonymous report will be traced.
- **Independence:** the actions derived from any complaint are managed by a body designated by Quirónsalud, in a completely fair, complete, objective, independent and honest manner. Quirónsalud guarantees independence, impartiality and absence of conflicts of interest in all phases of the process of managing complaints and internal investigations.
- **Exhaustiveness and motivation:** an exhaustive and complete analysis of the facts and circumstances reported is guaranteed, avoiding any arbitrariness. Complaints will be reviewed in a justified and motivated manner.
- **Information:** any complainant may access, review and consult the status of his or her complaint at any time, as well as communicate with the body in charge of handling it, even in the case of anonymous complaints.
- **Prohibition of retaliation:** any type of retaliation, negative consequence and threat or attempt of retaliation against any whistleblower who in good faith reports a fact through the Whistleblower Channel, for the simple fact of filing it, is expressly prohibited.

### ***What happens if the reported facts are proven to be true?***

After the pertinent investigation, if it is concluded that the reported facts may constitute an infraction or noncompliance: (i) the competent body shall be notified so that it may adopt the

disciplinary, corrective or preventive measures deemed appropriate, and (ii) the complainant and the reported party shall be informed of the conclusions obtained.

Subsequently, the competent body will carry out a follow-up control to ensure that the measures taken have been properly carried out and that no retaliation or negative consequences have occurred against the complainant.

### ***Is the anonymity of whistleblower guaranteed?***

In the complaint process, the complainant may decide whether or not to provide contact details. If he/she decides not to do so, he/she will have to establish his/her own follow-up through the Whistleblower Channel to see the progress and resolution. The Channel tool is independent of the company and does not record IP information from where it connects.

### ***How can I communicate with the recipient of my complaint?***

You can set up a postbox via the Whistleblower Channel to communicate with the person handling your complaint. You can also remain anonymous when communicating via the postbox if you wish.

If you do not set up a postbox, we will not be able to contact you if we have further questions or if anything is unclear. In this case, we may not be able to process your complaint further.

### ***How can I find out the status of my complaint?***

At the time the report is made, a tracking code will be sent to the complainant, which can be consulted at any time to check its status.

### ***What areas are outside of the Whistleblower Channel and where should I turn to?***

For any communication related to the experience of users and patients (thanks, suggestions and/or complaints and claims) there is a [channel on the corporate website](#) to which any third party can address. These communications are managed directly by the Patient Experience/Patient Care services of the center to which they relate to.

Complaints about security breaches are reported via ServiceDesk (in case of employees) or by email to the DPO (in the case of third parties).

Finally, labour-related complaints on issues that fall outside the scope of the Whistleblower Channel should be reported directly to the HR manager of the center or, failing that, to the corporate HR Manager.

### ***Can I file a complaint through a channel other than the Whistleblower Channel?***

Yes, Spanish Law 2/2023, of February 20, regulating the protection of people who report regulatory infractions and the fight against corruption, provides for the creation of an external reporting channel and the appointment of an Independent Whistleblower Protection Authority to which any natural person may report the commission of any acts or omissions falling within the scope of the Law.

### ***Who is protected besides the whistleblower?***

All persons concerned shall be protected until their guilt has been established or their degree of participation in the offense under investigation has been concluded. The term "*Affected Person*" shall be understood to mean a person who is mentioned by name or in the context of the description provided.

### ***What does it mean that the whistleblower is protected? How long will I be protected?***

Whistleblower protection includes the express prohibition of acts constituting retaliation, including threats of retaliation and attempts to retaliate against persons who make a communication under the Spanish Law 2/2023, of February 20, regulating the protection of people who report regulatory infractions and the fight against corruption. Retaliation means any acts or omissions that are prohibited by law, such as:

- Suspension of the employment contract, dismissal or termination of the employment or statutory relationship, including the non-renewal or early termination of a temporary employment contract after the probationary period has expired.
- Damages, including those of a reputational nature, or economic losses, coercion, intimidation, harassment or ostracism.
- Negative evaluation or references regarding work or professional performance.
- Inclusion in blacklists or dissemination of information in a specific sectoral area, which hinder or prevent access to employment or the contracting of works or services.
- Denial or cancellation of a license or permit.
- Denial of training.
- Discrimination, or unfavorable or unfair treatment.

A person whose rights have been harmed as a result of its communication or disclosure after the two-year period has expired may request protection from the competent authority which, exceptionally and with justification, may extend the period of protection, after hearing the persons or bodies likely to be affected. The refusal to extend the period of protection must be justified.

### ***Can I withdraw a complaint?***

Once a complaint is filed, it is archived and recorded in the system and cannot be deleted. Use the postbox to communicate with us if you would like to add anything.

### ***For how long must the complaint be filed?***

Records of reports will be deleted after three (3) years (due to statute of limitations), although longer storage may be justified, e.g. in case of litigation, provided it is necessary and proportionate.