

MANGO

Complaints channel regulation

Guaranteeing the ethical values of the Mango Group is the responsibility of everyone

VERSION	DATE	AUTHOR	CHANGES
1.0	-	Compliance Committee	Initial adoption
2.0	December 2022	Compliance Committee	Review and adaptation of the Regulation to the recent “Bill to regulate the protection of persons who report breaches and to fight corruption” (Proyecto de Ley reguladora de protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción).

APPROVALS

MANAGEMENT BODY	ORGANISATION	DATE
Compliance Committee	MANGO MNG, S.A.	-

RELATED DOCUMENTS

NAME	LATEST VERSION
Compliance Policy	July 2021
Code of ethics	June 2021
Crime Prevention Model	June 2022
Complaints channel Management Policy	June 2021

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Introduction

The prestige, image and reputation of the Mango Group, as well as its leading position in the market, are a direct consequence and a true reflection of its firm commitment to the Lawfulness, Ethics and corporate values, among other aspects. As an essential principle of our organisation, it is necessary that all our personnel, and those who act on our behalf, comply with and respect the current legislation, our Code of Ethics and our internal policies and procedures at all times.

However, at the Mango Group we are also aware that the inappropriate conduct of one individual can harm our image and our reputation at any moment. And also generate criminal liability for Mango, as a legal person.

For this reason, at the Mango Group we work actively to prevent and avoid the possibility of this occurring.

In this regard, the current legislation is reinforcing the need for companies to have “Models of Criminal Risk Prevention”: systems and mechanisms of control that make it possible to prevent, detect and react to the risk that any employees commits and unlawful activity, even if this ends up benefiting the organisation.

For the efficiency of all these models, the complaints channel plays a key role, by allowing us to comply with our legal obligation to report any potential infractions and breaches. In line with our culture of ethics and compliance, this is expressly established in our Code of Ethics, in our Compliance Policy and in our Model of Crime Prevention.

The complaints channel we have implemented at the Mango Group is designed and regulated in such a way to guarantee at all times the required conditions of confidentiality, security and independence. Similarly, and as a back-up, our channel has a series of measures to prevent the complainant suffering any form of reprisal for merely making a complaint. These are basic pillars of our channel that must be respected and guaranteed at all times by the entire organisation.

On this point, it is necessary to clarify that the complaints channel regulated in this Regulation is available to all our employees, collaborators and suppliers. In detecting potential unlawful conduct or breaches, their cooperation is of great importance. Customers have a different and specific channel to make their complaints: the “Customer Service channel (SAC)”.

Notwithstanding the above, through this document and following the passing of (EU) Directive 2019/1937 of the European Parliament and of the Council (on the Protection of Persons who Report Breaches of European Union Law), we are updating and regulating the complaints channel implemented at the Mango Group.

Consequently, this “Complaints channel Regulation of the Mango Group” (hereinafter, the “Regulation”) represents the development and update of the “Management Policy the Mango Group complaints channel” (“Policy”).

1. Subjective scope

1.1. Companies covered by the channel

This complaints channel belongs to and is made available to the different commercial companies that make up the Mango Group (hereinafter, also referred to as the “Group”).

As the parent company of the Group, it is hereby stated that the organisation legally responsible for the channel is the commercial company “MANGO MNG, S.A.”.

1.2. Who can make a complaint?

- a) The following persons can make a complaint via this complaints channel:
- Employees
 - Personal made available by Temporary Employment Agencies
 - Interns and trainees
 - Volunteers
 - Candidates in a recruitment process
 - Former employees
 - Members of the Administration, Management and Supervisory bodies of any Mango Group company

- Partners and Shareholders of Mango Group companies.

All the above, hereinafter the “Personnel”. In all cases, it should be noted that employees, temporary employment agency staff, interns and volunteers have a legal obligation to make a complaint if they detect a breach.
- b) Complaints and queries may also be made by:
 - Independent external collaborators
 - Any person who works for (or under the supervision or management of) a supplier, contractor or subcontractor of the Mango Group.
 - Any company, as a legal person, that collaborates or provides its services to the Mango Group.

Hereinafter, “Third Parties”.

1.3. Who can be reported via the complaints channel?

All Mango Group Personnel and its Third Parties may be reported (1.2).

2. Objective scope

2.1. What conduct can be reported via this channel?

Via this channel any conduct likely to constitute a breach of the current legislation, the Mango Group internal regulations and our Code of Ethics may be reported.

Specifically, irregularities and breaches in the following spheres should be reported via this complaints channel:

- Health and Safety at work, workplace harassment, sexual harassment, gender-based harassment
- Professional development, equal treatment and opportunities, or any form of discrimination
- Relations with third parties (conflicts of interest, gifts, fraud, corruption, bribes, illicit collections and payments or privileged information and CSR)
- Competition Law or Unfair Competition
- Intellectual and industrial property
- Personal data protection
- Breach of statutory policies and regulations (employment, tax of legal in general)
- The environment and sustainability
- Financial, accounting and tax issues

In the case of a complaint related to harassment, the established protocol for such cases will be followed. Hereinafter, the “objective scope” of the channel.

2.2. What conduct is not covered by this complaints channel?

The scope of this channel does not include complaints made by customers, which should be channelled via their “Customer Service”.

3. Channels and requirements for making complaints

3.1. Through which channels can a complaint be made?

Complaints may be made via the following channels:

1.
- Via the application enabled in www.mango.com and www.mangofashiongroup.com for this purpose.
2.
- By post: C/ Via Augusta 10, Polígono Industrial Riera Caldes, 08184 Palau-solità i Plegamans (Barcelona). For the attention of the Chief Compliance Officer of the Mango Group (“CCO”) and marked “Confidential” on the envelope.
3.
- Verbally (in person or by telephone): through the Chief Compliance Officer (carlos.madrona@mango.com) or the regional HR BP. In such cases, el Chief Compliance Officer will document the case, confidentially and internally.

If the complainant considers that the CCO may have a conflict of interest with regard to the complaint (6.1), they should address the complaint to the Head of the Legal Department via the account legal@mango.com

If the complaint is received by a member of the People department, the same will immediately inform the Chief Compliance Officer without any need to evaluate/analyse the content or keep a copy of the same, wherever applicable.

Similarly, the company website of the Mango Group will provide clear and accessible information on the external reporting channels of the competent authorities and, wherever applicable, the institutions, bodies and organisations of the European Union, once such information has been approved and made public.

3.2. What requirements does the complaint have to fulfil?

The presentation of a complaint must fulfil certain formal requirements:

- a)
- Be made via one of the channels mentioned in section 3.1.
- b)
- If the complaint has been made in writing (by e-mail or post), it must be made in accordance with the Form attached as Annex I.

- c)
- Include all the information and evidence available to the complainant.

It must also comply with the following material requirements:

- d)
- Be made in good faith and deal with true facts (without prejudice to any inaccuracy or omission that may be made involuntarily by the complainant).
- e)
- Deal with facts included in the objective scope of the channel (2.1.).

4. Protection of the complainant

1. In accordance with the stipulations of article 456 et seq. of the Spanish Criminal Code, the accusation, false testimony and simulation of offences is itself a criminal offence and may be penalised with a prison sentence of up to two years.

4.1. Anonymity and confidentiality of the complainant

Complaints may be made anonymously. Consequently the complainant may, at their own discretion, identify themselves or make an anonymous complaint.

However, complainants will be encouraged to identify themselves when making their complaint. This way, it will be possible to obtain more information and resolve any potential queries about the reported facts with them.

If the complainant decides to identify themselves, Mango will guarantee them maximum confidentiality and protection. Therefore, notwithstanding exceptions established in the law, the identity of the complainant will not be provided to any third party.

Consequently, the identity of the complainant may only be provided to the Judiciary, the Public Prosecution Service or the competent administrative authority (as part of a criminal, disciplinary or sanctioning investigation). What is more, persons in the Mango Group who, as a result of their functions, may have access to and knowledge of the complaints made and the identity of the complainant, are obliged to

observe confidentiality and professional secrecy with regard to both the identity of the complainant and the content of the complaint.

For their part, notwithstanding the cases established in the law, they will not provide the respondent the identity of the complainant. Therefore, exercise by the respondent of their right to access in virtue of the Data Protection legislation (see section 7) shall not involve access to the identity of the complainant.

In all cases, where the complaint is made anonymously, special precautions will be taken to preserve the presumption of innocence and the privacy of the respondent.

4.2. Prohibition of reprisals

During the investigation of a complaint, under the terms regulated in this Regulation, the affected parties will have the right to the presumption of innocence, the right to defence and access to the proceedings, to the protection of their personal data, and to their honour and personal and family intimacy.

Any reprisals (including threats and attempted reprisals) against persons making a complaint are strict-

ly and expressly prohibited. Mango will make every effort to prevent, pursue and sanction any type of reprisal against a person who makes a complaint in good faith.

NOTE: For this purpose, “reprisal” is understood to mean any act or omission prohibited by law or which, directly or indirectly, involves unfavourable treatment to someone who suffers a particular disadvantage compared to another in the employment or professional context merely as the result of being an informer.

As a consequence of the above, persons making a complaint in compliance with the requirements of section 3 above shall be protected against any form of reprisal, discrimination or penalisation as a result of making said complaint.

This prohibition of reprisals shall not prevent, wherever applicable, to adoption of disciplinary measures when the internal investigation determines that the complaint was false and that the complainant was aware of its false nature, and therefore acted in bad faith¹.

For the purpose of the present Regulation, and by way of example, the following will be considered reprisals:

- Dismissal or suspension of the employment contract
- Early termination of a temporary employment contract, once the trial period has passed
- The non-recruitment of a complaining candidate
- Imposition of any disciplinary measure, demotion or denial of promotion or any other substantial modification to the employment conditions (except where said measures are implemented in accordance with the employment legislation, and due to circumstances, facts or infractions that are accredited and not related to the making of the complaint)
- Denial of training that would have been offered had the complaint not existed, or without apparent reason
- Early termination or cancellation of contracts for the sale or leasing of goods or services
- Coercion, intimidation, harassment or alienation
- Harm, including that of a reputational nature or financial losses
- Prejudicial modifications to employment duties and responsibilities
- Unjustified changes of workplace or transfers
- Negative evaluations or references regarding work or professional performance that are

- unjustified or involve sudden and unfounded changes
- Blacklisting or diffusion of information within a specific sector, which impede access to employment or the contracting of works and services
- Cancellation of a license or permit
- Making of medical or psychiatric references with regard to the complainant
- Discrimination, unfavourable or unfair treatment.

In addition to the complainant, the protection measures envisaged in this section 4.1. shall also apply:

- In cases where the complainant is a Mango Group employee, to the persons in the organisation who, in the fulfilment of their statutory duties, assist them in the process of managing and investigating the complaint.
- To their departmental colleagues and family members (ascendants and descendants, spouses or partners, and siblings).
- To physical persons who, given their close relationship with the complainant, may influence the complainant when making the complaint and provide information and potential evidence.

4. Protection of the complainant

4.3. Conditions of the protection

The protection regime stipulated in this Regulation shall apply to the persons indicated in section 4.1. above provided that:

- a) The complaint is made fulfilling the requirements stipulated in this Regulation
- b) The CCO of the Mango Group has reasonable cause to assume that the information in the complaint is true at the time the complaint is made, even if the complainant has not been able to provide conclusive proof
- c) The complaint is within the objective scope of the channel

To the contrary, protection shall be expressly excluded for complainants who inform of:

- a) Information that was fully available to the general public
- b) Complaints that are not admitted
- c) Information related to interpersonal conflicts, or which only affect the complainant and the respondent
- d) Mere rumour
- e) Information related to breaches not included within the objective scope of the channel.

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2. The use of a generic e-mail account, to which more than one user may have access (for example, purchasing@mango.es or commercial@mango.es) or an excessively generic postal address (for example, “Mango Financial Department” or “Mango Store on Paseo de Gracia”) shall not be considered neither secure nor reliable.

5.1. The Chief Compliance Officer (CCO) as the Head of the complaints channel

Mango has entrusted the management of the complaintschannel to the Chief Compliance Officer of the Mango Group, having appointed its Board of Directors as the Head of the complaints channel. Therefore, it is the responsibility and obligation of the CCO to guarantee that the channel fulfils the required conditions of independence, confidentiality, professionalism, traceability and transparency at all times. Similarly, the CCO is responsible for the reception and management, wherever applicable, of complaints that are made.

Notwithstanding the fact that are Personnel (1.2.) are obliged to collaborate with the CCO, the CCO may count on the support and advice of the following persons:

- 1. Any member of the Mango Internal Control Department or the Compliance Committee
- 2. The Head of the Legal Department
- 3. An external professional and specialist in Compliance and complaints channels, who can be contracted and resorted to whenever the CCO deems appropriate. This external expert may be a physical or legal person (“External

expert”), with whom the appropriate data processor contract will be signed.

5.2. Stages in the processing and investigation of complaints

The following stages will be followed in the processing and investigation of complaints made.

The investigation will have a maximum duration of three months, counting from the presentation of the complaint. However, exceptionally, if significant reasons make this advisable, the CCO may agree successive extensions of one month for its conclusion, up to a maximum of 3 extensions.

5.2.1. Stage 1: Reception, registration and preliminary analysis. Admission.

a) Reception, Acknowledgement of receipt and Registration of written complaints

All the complaints made will be received by the CCO.

If the complainant has provided a secure and reliable means of communication², the CCO will send acknowledgement of receipt within 7 days. Exceptionally, if said acknowledgement of receipt places

the confidentiality of the complaint at risk, the CCO may extend the deadline up to a maximum of 15 days.

In parallel, the CCO will assign a code to the complaint, initiate the corresponding proceedings and register it in the “Monitoring of Ethics Incidents Registration Book”. This register is not public, given that it can only be accessed by the Chief Compliance Officer and the member of the Internal Control department the CCO may appoint. Furthermore, access to the same by third parties may only be granted under a judicial order.

b) Types of verbal complaints

If the complaint is made verbally (in person or by telephone):

1. Within a maximum deadline of 7 days from its reception, the CCO will offer the complainant the option to formulate, ratify, extend or clarify the complaint in a face-to-face meeting.

2. If the complainant agrees to attend said face-to-face meeting, the CCO (or external expert referred to in section 5.1) will document the complaint by recording it on video (if the complainant

authorises this) or transcribing the conversation, in a minutes book, in writing. In this meeting:

- The complainant may attend accompanied, if they so wish, by a Lawyer or a Workers’ Representative.
- To guarantee the required confidentiality of the investigation, those attending this meeting will be informed by the CCO, in writing, of their duty of secrecy and confidentiality, in addition to all legal information with regard to Data Protection. For this, Annex II of the present Regulation will be used.
- The recorded minutes will be signed by those present at the meeting. If, for any reason, the complainant or any person present does not wish to sign the minutes, this will be stated and the investigation will continue its course.

3. If the complainant does not wish to attend any face-to-face meeting, the CCO (or the regional HR BP, if they have received the complaint) will make a written transcription of the complaint in the most true and accurate manner possible, for filing in the proceedings.

NOTE: Whenever this Regulation refers to deadlines in terms of days, except where expressly stated to the

contrary, this shall be understood to mean calendar days, in other words including Saturdays, Sundays and Public Holidays.

c) Appointment of the “Instructor” of the complaint. Preliminary analysis.

Next, we shall proceed with the preliminary analysis of the reported facts. Therefore:

1. The “Instructor” of the complaint, as a general rule, will be the Mango Group CCO, or, if the CCO deems this appropriate, the external expert the CCO has appointed (5.1.) or the regional HR BP. In the latter case, the HR BP must sign Annex II of the present Regulation. The identity of the Instructor will be stated by the CCO, whenever applicable, during the registration of the complaint (5.2.A).

However, the CCO will supervise the management and investigation of the complaints instructed by said External Expert or regional HR BP, and will offer them support, assistance and advice at all times.

2. If there are justified reasons for the same, the CCO may revoke the appointment of the External Expert as Instructor and take control of the management and investigation of the complaint. How-

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ever, in such cases, the CCO will act as an Instructor alongside the Head of the Legal Department of MANGO.

3. The Instructor will receive the video recording, the minutes of the meeting or the transcription of the conversation, whichever applies, together with any documents the complainant may have provided.

4. If the complainant has identified themselves, we will try to maintain an open communication with them at all times, in order to clarify with them any questions that may arise or possibly ask them for additional information.

Therefore, if the Instructor considers that the complaint has a defect (formal or material), the complainant will be contacted in order to remedy this as soon as possible. Similarly, if the Instructor considers that the information provided is insufficient to commence an investigation, the complainant will also be notified in order to extend or detail the complaint, or provide possible additional information. For such matters, the Instructor will be free to grant the complainant the deadline they deem appropriate.

5. The Instructor may conduct a preliminary analysis of the complaint and, depending on its content

and the evidence provided, decide whether it is admissible or inadmissible.

If the Instructor is the External Expert or the regional HR BP, the decision not to admit the complaint will be taken by the CCO (without prejudice to others proposing, with justified reason, another measure). In all cases, said decision will be taken by the CCO.

d) Non-admission of the complaint.

The non-admission of the complaint will be agreed on any of the following grounds:

- The complaint does not fulfil the formal or material requirements indicated in section 3.2. of this Regulation
- The reported facts lack credibility
- The complaint made lacks grounds
- In the view of the Instructor, there are rational indications that the information provided with the complaint has been obtained through the commission of an offence
- The complaint does not provide new and significant information compared to a previous complaint already concluded (except where in legal terms the situation has changed, or there is a new fact of sufficient importance)

In such cases, the inadmissibility will be stated in

the Registration Book (5.2.A) and any personal data collected will be duly blocked, under the terms of Annex III.

In addition, the CCO will inform the Compliance Committee, at each of its meetings, of the activity generated in the complaints channel. The CCO will also notify any complaints that have not been admitted and if the Compliance Committed is not in agreement with the inadmissibility, it may reconsider the case.

e) Admission of the complaint.

Whenever the complaint fulfils the requirements of this Regulation (3.2.), the CCO will admit it and will commence the investigation stage.

If necessary, the Instructor will propose the adoption of precautionary measures in order to protect the complainant and/or prevent the continuation of the irregular conduct. The measures must be justified, reasoned and proportional. Furthermore, they must be approved by the Instructor and/or Compliance Committee, wherever applicable.

f) Information to the affected parties

Once the CCO decides on the admissibility or inad-

missibility of the complaint, if the complainant has identified themselves and provided a secure and reliable means of communication, the Instructor will notify the complainant within a maximum deadline of 7 days, counting from the decision, providing them a summary of the decision. Said deadline can be extended by the Instructor up to a maximum of 15 working days if, in his view, grounds exist that make this advisable.

With regard to the respondent, the Instructor will inform them about

- (i) the reception of a complaint against them and its admission
- (ii) the facts of the complaint
- (iii) the departments and third parties that may be aware of the complaint, wherever applicable
- (iv) how to exercise their data protection rights

This notification will be sent as soon as possible, and in all cases within a deadline of 30 days from reception of the complaint.

If the CCO considers (on his own initiative or at the request of the External Expert or regional HR BP Instructor) that there is a risk that said notification may prejudice the investigation, in exceptional circumstances it may be delayed up to a total, maxi-

mum and non-extendible deadline of three months counting from the reception of the complaint.

Taking into account the brevity of the statutory limitation of employment misconduct, the CCO may provide the People-Employment department an initial estimation of how long the investigation will take, so that they can assess whether to commence parallel disciplinary proceedings, in order to prevent the statutory limitation or expiry of potential disciplinary employment measures.

Any written communication which the External Expert or regional HR BP maintains, when appointed as Instructors, with the complainant or respondent shall include a copy for the CCO.

In addition to the foregoing, the parties involved in the consultations or complaints received will be duly notified or the legal conditions concerning the Privacy under which their personal data will be processed. In order to implement the foregoing, Mango will decide the required mechanisms to guarantee that the recipients of this channel are aware of and have at their disposal, in a manner that is simple, accessible, understandable and, of course, free of charge, the Privacy rules contained in this Policy. The foregoing, in all cases, prior to the lodging of any potential consultation or complaint.

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Furthermore, each time a complaint or consultation is made, Mango will individually notify the persons involved of the collection and subsequent processing of their personal data. However, the manner in which the foregoing shall be implemented in a personalised manner. Therefore, with regard to the same, and notwithstanding the fact that this Policy can be accessed on the webpage and on the corporate website of the Mango Group, and that a copy of the same is included in the welcome pack of employees, in order to reinforce and guarantee compliance with said duty of information, the following measures will be implemented (according to whether this involves the complainant, the respondent or an involved third party):

- **Complainant:** if the complainant identifies themselves when making the complaint, they will also be informed of the processing of their data in the e-mail sent to them to acknowledge receipt of the presentation of their complaint or consultation, with a link to said Privacy Policy.
- Excepcionalmente, esta notificación personalizada no se realizará si el denunciante ha empleado una cuenta de correo de uso común o compartido, o accesible para más personas

de la organización (por ejemplo, comercial@mango.com o compras@mango.com).

- **Respondent:** the above will apply with regard to the notification of a lodging of a complaint against them, adding in the information that they will be provided the corresponding guarantees relating to data protection.
- **Any other interested party involved in the complaint or consultation:** finally, third parties involved in the complaint or consultation made will be informed prior to their participation in the process: for example, a potential witness prior to their interview or the taking of a declaration.

5.2.2. Stage 2: Investigation of the reported facts

a) General Principles

1. In certain cases, the Manager for the area of action (hereinafter, the “Manager”) will act as the Instructor in the management of the proceedings in coordination with the Chief Compliance Officer. In general, if the affected person is part of the Personnel, the Instructor could be the Manager of HR BP headquarters/retail/Health and Safety and if the affected person is part of the Third Party group, the

Instructor could be the Manager of CSR/Health and Safety HR BP headquarters/retail. All the foregoing is dependent on the issue being dealt with and shall at all times be in accordance with the decision adopted by the Chief Compliance Officer in this regard.

2. The Instructor will carry out the investigation proceedings which, in their opinion, are necessary to confirm the veracity of the reported facts. Said proceedings shall, at all times, observe the following rules and principles:

- a) **Proportionality:** The data and information compiled during the investigation shall be limited to what is strictly and objectively necessary in order to confirm the veracity of the reported facts.
- b) **Right to an impartial instructor.**
- c) **Equality between the parties:** Unfair situations of privilege of one of the parties (complainant or respondent) to the detriment of the other.
- d) **Right of defence:** Guarantee of the respondent that they may request and provide evidence, and argue evidence presented against them.
- e) **Right of objection:** Right of the parties, both complainant and respondent, to assert their respective claims and to be heard.
- f) **Right to Honour, Personal and family intimacy, and to the Protection of their Personal Data.**

g) **Right to the presumption of innocence of the person being investigated:** All persons will be presumed innocent and treated as such throughout the investigation proceedings, while they do not admit their responsibility for the reported facts.

3. The Instructor will be able to count on the collaboration of any member of the Internal Control Department, the Compliance Committee, the Head of the Legal Department, and any potential external expert advisors.

4. Similarly, all Mango Group personnel are obliged to collaborate faithfully with the investigation, and to maintain secrecy regarding its content. The intervention of witnesses and affected parties shall be strictly confidential, particularly with regard to the identity of the complainant.

5. Participation in the proceedings conducted throughout the investigation by any person other than the Instructor, the complainant and the respondent and his lawyer shall necessarily require the Confidentiality Agreement established by the Instructor to be signed.

6. Furthermore, the personal declarations shall be made at times and in locations that do not pose

a risk to their necessary reserved and confidential nature. Whenever the Instructor deems it appropriate, they may be made in online format, via a videoconferencing system.

7. In all the proceedings that are conducted, the Instructor shall at all times respect the Code of Ethics of the Mango Group, in addition to the current data protection legislation, the Workers’ Statue and the Collective Bargaining Agreements that are applicable.

b) Proceedings to obtain information and documentation

The Instructor shall collect all possible information and documentation related to the reported facts.

For example, the Instructor may access the work e-mail account of the respondent, the company archives, the register of telephone calls made by the respondent from company devices, the internet history of searches from their company computer, the registers of entries and exits to and from the company premises, their records of business expenses and trips, the back-up system of the affected company computers, and any other information of a professional nature that is necessary in order to investigate the facts. They may also take a witness

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statement from any member of the Personnel or Third-party Collaborator who may have knowledge or news about the reported facts.

The Instructor, in conducting the proceedings to obtain information and documentation, shall at all times observe the provisions of the Security Policy and User Regulations of the Mango IT Systems, in order to guarantee the confidentiality, integrity, availability and security of the information they may have access to and manage, and also respect the personal and family intimacy of the respondent and of other affected persons.

Specifically, the Instructor shall, in particular, bear in mind that, in accordance with the provisions established in said Policy, Mango may access the e-mail inbox and/or any other device it owns and has provided to its employees and/or collaborators (solely to consult company information, expressly excluding all other information of a personal nature or outside the professional relationship with Mango), without prior notice and including after termination of the relationship between the parties, counting on the express consent of the employee and/or collaborator for said action.

c) Personal declarations of the respondent and witnesses

1. Once the Instructor disposes of the documentation and information they consider appropriate, they can commence hearing proceedings with all the affected parties and witnesses and conduct whatever additional investigation proceedings they deem necessary.

When commencing hearing proceedings with the respondent and the witnesses, as applicable, the Instructor will summon them giving at least 7 days notice in advance.

2. At the start of each interview or declaration, the Instructor will inform the interviewee (i) of the purpose of the investigation and the interview, (ii) of their rights, (iii) that, pursuant to the present channel Regulation, the Mango Group will not accept reprisals for any information they may provide, (iv) of the different aspects imposed by the Data Protection legislation, such as (v) the confidential nature of the interview.

3. The interviews will be recorded on video, if so authorised by the person giving the declaration. If they do not authorise this, minutes of the declaration will be taken, which will be presented to the declaring party to sign. If they refuse to sign them, the Instructor will record said circumstance and the declaration shall be deemed concluded without further ado.

4. When the Instructor takes the declaration form the respondent, the latter may request to have present (but not intervening) a member of the Workers' Representatives, or two employees appointed by the respondent who are not affected by the investigation process, as well as a Lawyer, who will assist the respondent and inform the same of their rights.

5. In the declaration of the respondent, the Instructor:

- Will provide a summary of the facts referred to in the proceedings
- Invite them to give their complete version of the facts
- Ask them the questions considered to appropriate
- Inform them of their right to provide the evidence they consider to be appropriate in order to support their defence, as well as a deposition. For this, they will be given a deadline of 10 days.

5.2.3. Stage 3: Issue of Internal Investigation Report and Draft Ruling

The proceedings instruction will conclude with the issue of the Internal Investigation Report by the Instructor ("the Report"), which will be shared:

- With the Compliance Committee, whenever the CCO is the Instructor.
- With the CCO, whenever the Instructor is the External Expert or a Regional Manager. In this case, the Chief Compliance Officer will review the Report. If no clarification is required from the Instructor, it will assume ownership of it and will share it with the Compliance Committee.

The Report will include a reasoned Draft Ruling, with regard to any of the following decisions: (i) the existence or non-existence of a breach (including the proposed sanction, without the need to explain the specific sanction), or (ii) the undertaking of complementary proceedings, which may be necessary to determine whether a breach has existed or not.

5.2.4. Stage 4: Termination of the Investigation: archive or disciplinary regime

Once the investigation has concluded and the Report and Draft Ruling has been sent to the Compliance Committee, said body will make an internal deliberation and adopt one of the following decisions:

a) **Archive the complaint**
The Compliance Committee will agree to archive the complaint when it considers that the reported facts have not been sufficiently proven, or that the

same does not constitute a breach included within the objective scope of the complaints channel.

The CCO will inform the complainant and the respondent of said decision, in this order, within a maximum deadline of 7 days.

b) Proposed disciplinary measures

Whenever the reported facts have been sufficiently proven, and also constitute a breach included within the objective scope of the complaints channel, the Compliance Committee:

(i) Will formulate a written and duly reasoned draft ruling of the potential disciplinary measures to adopt.

(ii) Send the complaint, the documented results of the investigation and the proposed sanction to the People-Employment department, which has responsibility for executing the specific measures adopted.

Finally, if deemed appropriate, and depending on the result of the investigation, the adaptation or improvement of the Model will be evaluated, in order to prevent similar cases in the future that may result in some form of breach.

6. Conflicts of interest. Specific cases where the complaint affects a Mango Director or the Chief Compliance Officer (CCO)

For the purpose of this section, the risk of a conflict of interest will be deemed to exist in the following cases:

- a. Existence of a family relationship with the complainant or respondent (ascendant, descendant, spouse or partner, and/or sibling)
- b. Be or have previously been reported by the complainant
- c. Be affected by the reported facts without communicating this previously
- d. Be part of the area or department affected by the complaint
- e. Clear existence of friendship or enmity with the complainant or respondent
- f. Be or have been in a situation of hierarchical dependency with regard to the complainant or respondent in the last twelve months
- g. Any other circumstance that impedes acting with independence, impartiality or objectivity, due to having a direct interest in the reported facts

To safeguard the necessary confidentiality, for the contracting of the External Expert in the cases included in this section, the ordinary expense and contracting controls and authorisations established in the Mango Group shall not apply.

6.1. Complaint which affects the Chief Compliance Officer (CCO)

If the complaint is made against the Chief Compliance Officer, or affects the same directly or indirectly, due to the existence of a conflict of interest, the same may not have knowledge of its content or its presentation. Consequently, the CCO cannot be responsible for its processing or investigation either.

In such cases, the processing of the complaint will be delegated to the Head of the Legal Department, who will proceed with the investigation, alongside an External Expert, whose appointment must have the approval of the Secretary of the Mango Board of Directors.

If deemed appropriate and prudent, the Compliance Committee, with the favourable vote of the Board Secretary, may consult with the CCO the potential existence of said conflict of interest. Depending on what it indicates in this regard, and at all times decided unanimously by the Board Secretary and all members of the Compliance Committee, they may decide that no such incompatibility or conflict of interest exists. In this case, the complaint will adopt the ordinary proceedings contained in this Regulation.

6.2. Complaint which affects a Mango Director

If the complaint affects any member of the Board of Administrators, the CCO will immediately notify this to the Chairman of the Board of Directors, (i) for his information (ii) to obtain his support and assistance in the processing of the complaint, and (iii) specifically for the mandatory selection and contracting of an external expert to participate (alongside the Compliance Committee) in the investigation.

If the complaint affects the Chairman of the Board of Directors, the CCO will inform the Vice-Chairman of said body for the same purpose.

In all cases, the Chief Compliance Officer, the Chairman or the Vice-Chairman of the Board of Directors may take whatever precautionary measures they consider appropriate.

7. Data Protection

In the design and review of this channel, Mango fully complies with the applicable data protection legislation; 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 (hereinafter, the “General Data Protection Regulation”) and its implementing legislation.

Annex III includes legal information applicable to the complaints channel with regard to Personal Data Protection.

Annex I

Form for making a complaint via e-mail/post, or verbally.

Name and surname(s) of the complainant (optional)

Relationship the complainant has with the Group
(for example, employee, supplier, contractor, franchisee, etc.)

In the case of an employee, indicate the Department
or Area you belong to (optional):

If you wish to have a face-to-face meeting, answer
YES below. Otherwise, leave the space blank.

Address or means of contact chosen by the complainant
for the purpose of notification (e-mail address, postal address,
telephone number):

Name and surname(s) of the respondent:

Department/Area the respondent belongs to:

Description of the facts:

Where applicable, attach supporting documents
on the basis of the complaint.

I declare that I am making the present notification in good
faith and with regard to facts I have knowledge of, directly or
indirectly, without prejudice to the potential lack of evidence,
or any possible error, inaccuracy or omission that may be com-
mitted involuntarily.

Information on data protection

The personal data provided via this complaints chan-
nel will be processed by Mango as the legally-re-
sponsible organisation, in compliance of the legal
obligations derived from the Law on the Protection
of Persons who Report Breaches and to attempt to
prevent the commission of potential criminal activ-
ities. Except where legally required, said data shall
not be provided to any third party.

The persons involved may exercise their rights of
access, rectification, erasure, restriction of process-
ing and objection, under the established terms, by
contacting dpo@mango.com. For more legal infor-
mation, you may consult the Privacy Policy of the
complaints channel, available on our webpage and
on the company website, or by requesting the same
via the same e-mail address.

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