

**ALEXANDRE HOTELS**

**PLAYA DEL OESTE S.A.  
HOTEL LA SIESTA TENERIFE S.L.**

**HOTEL TENERIFE PLAZA S.A.**

**INVERSIONES INMOBILIARIAS TEGUISE RESORT S.L.**

**INTERNAL INFORMATION  
SYSTEM POLICIES**

## DOCUMENT CONTROL

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**DOCUMENT NAME**

Internal Information System Policy

**DESCRIPTION**

This Policy regulates, in accordance with the provisions of Law 2/2023, the general principles that regulate the Internal Information System of the following companies: PLAYA DEL OESTE S.A., HOTEL LA SIESTA TENERIFE S.L., HOTEL TENERIFE PLAZA S.A., INVERSIONES INMOBILIARIAS TEGUISE RESORT S.L.

**SCOPE OF APPLICATION**

PLAYA DEL OESTE S.A., HOTEL LA SIESTA TENERIFE S.L., HOTEL TENERIFE PLAZA S.A., INVERSIONES INMOBILIARIAS TEGUISE RESORT S.L.

**SUPERVISOR**

The Person in Charge of the Internal Information System

**APPROVAL DATE**

December 23, 2024

**EFFECTIVE DATE**

January 9, 2024

**VERSION**

1.0

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## DEFINITIONS

**Whistleblowing Channels**

It refers to all the Channels that allow the submission of Complaints.

**Complaints**

It refers to the communication of Information on infringements.

**Denouncer**

Refers to the Natural Person who falls within the scope of this Policy and who communicates to ALEXANDRE HOTELS or publicly discloses Information about violations.

**Directive (EU) 2019/1937**

It refers to Directive (EU) 2019/1937 of the Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of European Union law.

**Information on violations**

It refers to Information about actual or potential breaches that have occurred or are very likely to occur at ALEXANDRE HOTELS, including reasonable suspicions and attempts to conceal such breaches.

**Law 2/2023**

He is referring to Law 2/2023, of 20 February, regulating the protection of people who report regulatory breaches and the fight against corruption.

## INTRODUCTION

In compliance with Directive (EU) 2019/1937, an **Internal Information System** (hereinafter, the "**System**") has been implemented in the following companies:

- **HOTEL TENERIFE PLAZA S.A.**, with NIF A-58265703 and registered office at Avenida Litoral s/n, Playa las América (Arona).
- **PLAYA DEL OESTE S.A.**, with NIF A-38005724 and registered office at Avda. Can Salvatella, 85 a 97, Pican Salvatella, Barbera Del Valles (Spain);
- **HOTEL LA SIESTA TENERIFE II S.L.**, with NIF B-3543104 and registered office at Calle Rafael Puig, 15, Playa las América (Arona).

Hereinafter, collectively, "**ALEXANDRE HOTELS**".

In order to develop the principles contained in the Directive, as well as in **Law 2/2023**, it has been agreed to approve this "**Internal Information System Management Policy**" (hereinafter, the "**Policy**"), which establishes the general principles governing said System and the rights of the Whistleblower.

## SCOPE OF APPLICATION

The objective scope of this Policy will include all Complaints that are submitted by the persons detailed below through the Complaints Channels enabled by ALEXANDRE HOTELS and that have as their object an alleged Infringement.

As for the subjective scope of Politics, it will include the following people:

- i. Employees; ii. Self-employed workers;
- iii. Former employees;
- iv. Shareholders, participants, members of the company's administrative, management or supervisory body, including non-executive members;
- v. Persons working for or under the supervision and direction of contractors, subcontractors, and suppliers;
- vi. Volunteers, interns and workers in training periods with or without remuneration and people who have been part of a pre-contractual selection or negotiation process.

The protection guaranteed to the Whistleblower shall extend to:

- the legal representatives of the workers in the exercise of their functions of advice and support to the Whistleblower;

- natural persons who, within the framework of the organisation in which the Complainant provides their services, assist them in the Complaint process;
- other natural persons who are related to the Complainant and who may suffer retaliation, such as co-workers or family members of the Complainant.

Likewise, protection will be guaranteed to legal entities for which the Whistleblower works or with which he or she has any other type of relationship in a work context or in which he or she has a significant participation.

## GENERAL PRINCIPLES OF THE INTERNAL INFORMATION SYSTEM

The general principles governing the ALEXANDRE HOTELS Internal Information System are as follows:

1. Guarantee the confidentiality of the information contained in the Complaint and, in particular, the identity of the Complainant.
2. To have a Person in Charge of the Internal Information System who enjoys full independence and autonomy.
3. Guarantee at all times the presumption of innocence and the right of defence of the Affected Persons.
4. Always act in compliance with the principles of proportionality, suitability and reasonableness.
5. Zero tolerance for retaliation that, where appropriate, may be adopted against a Whistleblower.

## CONCEPT OF INFRINGEMENT

For the purposes of this Policy, the following shall be understood to fall within the concept of "**INFRINGEMENT**":

1. Acts or omissions that constitute infringements of European Union law, provided that:
  - a) They fall within the scope of the European Union acts listed in the Annex to Directive (EU) 2019/1937, relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; Product safety and compliance; Transport security; Environmental protection; Radiation protection and nuclear safety; Food and feed safety, animal health and animal welfare; Public health; Consumer protection; Protection of privacy and personal data, and security of networks and information systems
  - b) affect the financial interests of the European Union; or
  - c) Have an impact on 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 corporation tax rules or practices aimed at obtaining a tax advantage that undermines the object or purpose of the legislation applicable to corporation tax.
2. Actions or omissions that may constitute a serious or very serious criminal or administrative offence, including

all those that involve economic damage to the Public Treasury and Social Security.

3. Failure to comply with the principles, values, guidelines of action or rules of conduct set out in the internal regulations of ALEXANDRE HOTELS;
4. Any contingency that may pose a risk to the reputation of ALEXANDRE HOTELS;
5. Any other fact or circumstance that may reflect a relevant exposure to a risk of legal or any other nature.

Information about such Infringements must always be made in good faith and honestly, presenting reasonable grounds for truthfulness.

The Complainant shall be protected even if the information is inaccurate or, after investigation, the Complainant is found to be wrong.

## MEANS OF FILING A COMPLAINT

The means by which the commission or indications of commission of a certain Infringement may be reported to ALEXANDRE HOTELS are as follows:

- **Platform accessible from the ALEXANDRE HOTELS website** through [this link](#).

## THE PERSON RESPONSIBLE FOR THE INTERNAL INFORMATION SYSTEM

The competent body to manage, investigate and respond to Complaints filed through the Complaints Channels will be the Head of the Internal Information System of ALEXANDRE HOTELS.

The Head of the Internal Information System, among other powers, will be the body responsible for supervising, interpreting and guaranteeing compliance with this Policy, as well as for the supervision of the Whistleblowing Channel.

Their appointment and dismissal as System Controller will be communicated to the Competent Authority for the protection of the whistleblower.

The Head of the Internal Information System will carry out his/her functions independently, impartially and autonomously, having been provided with the necessary means for the development of his/her powers.

## RIGHTS AND GUARANTEES OF THE COMPLAINANT

- a. The right of the Complainant to file Complaints both anonymously and nominatively is recognized and guaranteed.
- b. The confidentiality of the data provided in the Complaint, as well as the identity of the Complainant, is guaranteed throughout the processing of the procedure.
- c. The Affected Person(s) to whom the facts reported in the Complaint refer will not be informed in any case of the entity of the Complainant.
- d. The processing of personal data carried out within the framework of the Whistleblowing Channel will be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, Organic Law 3/2018, of 5 December, and Organic Law 7/2021, of 26 May.

- e. Retaliation against the Whistleblower will be declared null and void and will carry a penalty. Protection against retaliation shall be extended for a period of two (2) years from the commencement of investigations. Retaliation is understood to be any act or omission that is prohibited by law, or that, directly or indirectly, involves unfavorable treatment that places the people who suffer them at a particular disadvantage with respect to others in the work or professional context, just because of their status as Whistleblowers.
- f. The independence, impartiality and absence of conflicts of interest in the processing of the Whistleblower are guaranteed.
- g. The Whistleblower has the possibility of reporting the facts through the procedures of the external channel to the competent authorities, i.e. to the Independent Authority for the Protection of the Whistleblower. However, priority will be given to the internal channel whenever possible.
- h. Whistleblowers, provided that they fall within the scope of protection of Law 2/2023, may access the following support measures:
  - (i) comprehensive and independent information and advice on available procedures and remedies, protection from retaliation and rights of the person concerned,
  - (ii) effective assistance by competent authorities to any relevant authority involved in their protection from retaliation, including certification that they are eligible for protection under the said Act;
  - (iii) legal assistance in criminal proceedings and in cross-border civil proceedings in accordance with Community rules, and
  - (iv) financial and psychological support, on an exceptional basis, if decided by the Independent Authority for the Protection of Whistleblowers.

## PROTECTION OF PERSONAL DATA

The processing of personal data will be governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, in Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights, and in Organic Law 7/2021, of 26 May.

Data whose relevance is not manifestly relevant to the processing of a specific Complaint will not be collected or, if collected by accident, will be deleted without undue delay. Under no circumstances will personal data that are not necessary for the knowledge and investigation of Infringements be processed, proceeding, where appropriate, to their immediate deletion.

The personal data contained in the complaints may be communicated to Judges and Courts, the Public Prosecutor's Office or the competent Public Administrations only in cases in which it is considered that the irregularities allegedly

committed could constitute a specific administrative offence or crime and are strictly necessary for the development of the relevant investigation by the competent bodies.

Access to the data contained in these systems will be limited, within the scope of their competences and functions, exclusively to:

1. The Head of the Internal System and whoever manages it directly;
2. The Director of Human Resources when disciplinary measures may be taken against a worker;
3. The Director of Legal Services, if appropriate, the adoption of legal measures in relation to the facts reported in the Complaint;
4. The data processors that may be designated.
5. The Data Protection Officer.

However, access to personal data by other persons, or even their communication to third parties, will be lawful when this is necessary for the adoption of disciplinary measures or for the processing of the investigation or judicial procedures that, where appropriate, may be appropriate.

The necessary technical and organisational measures have been adopted to preserve the identity of the Whistleblower and to guarantee the confidentiality of the data corresponding to the Persons Affected by the Complaint and any third party mentioned in the Complaint.

In the event that the Data Subject exercises their right to object, it will be presumed, unless proven otherwise, that there are compelling legitimate reasons that legitimise the processing of their personal data.

The data that are subject to processing may be kept in the system for the time necessary to decide on the admissibility of the investigation or, once it has begun, when they are no longer necessary or relevant for the purpose for which they were collected, proceeding, in the first case, to anonymise them and, in the second case, to its blockage.

For more information on the processing of your personal data, please consult our [privacy notice](#).

## EXTERNAL INFORMATION CHANNEL OF THE INDEPENDENT WHISTLEBLOWER PROTECTION AUTHORITY (A.A.I)

All individuals who are part of the groups with access to the Internal Information System may contact the Independent Authority for the Protection of Whistleblowers (AAI), or the corresponding authorities or regional bodies, to report the commission of any of the Infringements included in the scope of application of this Policy.

## POLICY UPDATE AND REVIEW

At the proposal of the Head of the Internal Information System, the content of this Policy will be updated and revised when necessary due to regulatory developments, best practices in the field, as well as changes in the business model of ALEXANDRE HOTELS.