

ETHICAL CHANNEL OF Hotel Negresco Princess

Welcome to the ethical channel that Hotel Negresco Princess (BCN LLURIA, S.L.) has implemented so that its employees, suppliers and clients can report violations of current legislation or current policies, in a secure and confidential manner.

Maintaining a culture of business integrity and ethics is one of our goals and this channel is an important tool to ensure that all the interested parts can safely and confidentially report any concerns they may have about business conduct, regulatory compliance or ethics.

Channel Managers and Ethics Committee

The communication will be investigated by the responsible people designated by BCN LLURIA, S.L.

The people responsible for attending to the communications made through the channel are led by management and are trained to carry out the assigned functions, having knowledge in the matter.

Behaviors object of communication

Based on what is established in the current informant protection regulations, below are some behaviors that are subject to communication through the channel, if you are aware of or in case you are a victim of them:

- Workplace harassment, including continued conduct such as: discriminating against the worker, isolating the worker, putting the worker's health at risk, reducing the worker's duties, disrespect and insults, defaming the worker.
- Sexual harassment in the workplace, including conduct such as: sending offensive sexual material, unwanted physical contact, comments about physical appearance, questioning about a person's sexual life, requesting sexual favors.
- Fraud and corruption, for example: misuse of financial resources for personal purposes, using influence or position to obtain benefits or to benefit personal interests rather than those of the company, bribery, manipulating company financial information.
- Theft: theft of money or goods, use of company bank cards for personal purchases.
- Unethical actions.
- Conduct contrary to business interests.

On the other hand, the channel **should not be used** for the following purposes:

- The contracting of products or services from BCN LLURIA, S.L. To do this, contact the reservations department.
- Claims and complaints from customers. Contact customer service.
- Sending job applications. Contact human resources.
- Complaints and requests to human resources. Contact human resources.
- Exercise data protection rights. Contact human resources.

How to present a communication

The communications can be submitted using the form accessible from the following link:

Form in Spanish: <https://251381c9067ce78a053c.canal.h2c.app/form.html#>

Form in English: <https://a2e428b6e7d0907908e0.canal.h2c.app/form.html#>

The communication will include the identifying data of the reporting person, basic contact information, the type of violation reported and a description of the facts being reported. Likewise, it will be accompanied by documents or other means admitted by law and legally obtained, that are intended to be used to prove the facts.

The communications will be handled confidentially and investigated fairly and impartially.

It is also reported that the creation of an external public channel dependent on the future Independent Authority for the Protection of Informants (AAI) is planned, as an alternative to private internal channels.

Anonymous communication

In certain situations it may be convenient to make the communication without providing the identity of the reporting person; for this reason, the channel form includes an option to submit the communication anonymously and confidentially.

To take an anonymous communication into consideration, it will be essential to provide some indications or evidence to support the complaint.

How to track procedure status

The reporting person can follow up on the communication by entering the code received after submitting the communication in the review section located under the web form.

Rights of the person making the communication

A series of rights and guarantees are derived from the presentation of the communication for the person reporting an infringement:

- Guarantee of confidentiality, preserving your identity and of anyone around you. The identity of the reporting person may only be communicated: to the authorized and designated people for the management of the channel and investigation of the facts; to the competent judicial or administrative authorities, and the Public Prosecutor's Office, within the framework of a criminal, disciplinary or sanctioning investigation.
- Respect for privacy and the protection of your data.
- Guarantee of protection against possible retaliation (for example, contract suspension) when the reporting person makes the communication in good faith and discloses facts that he or she has witnessed or has sufficient information and evidence to believe are true.
- Right to information.

- Independence, impartiality and objectivity in the management of communication and investigation of the facts.

Rights of the person affected by the events

On the other hand, the person to whom the facts are attributed will also have rights and guarantees during the procedure:

- Right to the presumption of innocence and honor.
- Guarantee of independence, impartiality and objectivity in the management of communication and investigation of the facts.
- Right of defense.
- Right to know the facts attributed to him and to access his file.
- Preservation of your identity.
- Confidentiality guarantee.

False Complaints

In case that, in bad faith, a communication containing false information is presented, BCN LLURIA, S.L. reserves to itself the right to take any legal action necessary to demand any liability and compensation for any damages that may be caused.

Questions about the channel

For more information, consult the channel policy:

[MORE INFORMATION](#)

If you have any questions about the channel, or to request more information, contact canaldenuncias.bcnulluria@princess-hotels.com