



HOTELS VIVA & RESORTS
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REGULATIONS OF THE ETHICS CHANNEL

Hotels Viva Ethics Channel (whistleblowing channel)

In accordance with Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption (hereinafter, "Law 2/2023"), INVERSIONES PASCUAL S.L. ("Hotels Viva"), with its registered office at Calle Agustín Argüelles 1, 07400 Alcudia, Mallorca, provides an Ethics Channel – canaldedenuncias@hotelsviva.com ("VIVA Ethics Channel") – for the Spanish companies it manages or in which it holds a stake, such as CALA EN FENOLL, SL, with its registered office at the same address as above, and HOLUDIA, SL, with its registered office at Calle les Savines, Urbanización Lago Esperanza, 07400 Alcudia (Balearic Islands), collectively referred to as the "**Companies**". This channel is intended for reporting any circumstances or irregularities that may be contrary to the provisions of the Hotels Viva Code of Conduct, as well as serious or very serious criminal or administrative offences, in accordance with Law 2/2023.

The Hotels Viva Ethics Channel must not be used to:

- Falsely or maliciously report others.
- Submit false or misleading information, or information obtained unlawfully.
- Submit complaints relating to personal matters unrelated to Hotels Viva.

Hotels Viva will never take retaliatory action against any whistleblower acting in good faith.

This is a confidential channel and is protected against unauthorised access. The identity of the whistleblower will not be disclosed to the individuals mentioned in the report or to any third parties. However, if you prefer, you may submit your report anonymously. In all cases, you may check the status of your report through the secure mailbox provided by the channel.

The Company to which you address your report via the Hotels Viva Ethics Channel is the data controller responsible for the personal data provided through the channel. It will process this data for the purpose of receiving and investigating reports of actions or omissions that may constitute breaches under Law 2/2023, or serious or very serious criminal or administrative offences. It will also process the data to manage and maintain the Hotels Viva Ethics Channel and, where appropriate, to adopt any relevant corrective or disciplinary measures, whether internal or involving law enforcement or judicial authorities.

The main legal basis for processing the personal data provided is compliance with the legal obligations set out in Law 2/2023.

The Company may obtain data both directly from the whistleblower and from third parties (e.g., witnesses, hotel manager, the person under investigation, Company departments, expert reports or police reports).

As a user of the Hotels Viva Ethics Channel, you may exercise your rights of access, rectification, erasure, objection, restriction of processing and data portability in relation to the processing for which any of the Companies is the data controller by writing to the address indicated above and providing proof of identity, or by email to: dpo@hotelsviva.com. For more information, please refer to the [Privacy Policy](#). By submitting a report via the Hotels Viva Ethics Channel, you confirm that you have read and understood the Privacy Policy.

In addition, you can access the [Internal Reporting System \(IRS\) Policy](#) and the [Information Management Procedure](#) through the following links.