Web content – Channel Page

Ethics Channel

Global Dominion Access, S.A. and its subsidiaries (hereinafter, DOMINION) provide professionals and third parties with an Internal Information System (IIS) through which potential breaches, violations of the Code of Conduct, or situations involving moral and/or sexual harassment may be reported securely and confidentially.

Who can use it

The channel is available to any person linked to DOMINION in a work-related or professional context, including, among others: employees, managers, directors, shareholders, job applicants, interns, volunteers, contractors, subcontractors, suppliers, and other third parties associated with DOMINION

What can be reported

Reports submitted through the IIS may concern acts or omissions that could constitute:

- Breaches of European Union law within the legally established scope, where applicable, as well as breaches of the laws of the jurisdictions in which DOMINION operates.
- Serious or very serious criminal or administrative offences.
- Breaches of DOMINION's Code of Conduct and other internal policies that may give rise to serious or very serious criminal or administrative offences.

Any reports received relating to matters, subjects, or issues not included in the categories above shall fall outside the specific protection framework established by Law 2/2023 on the Protection of Whistleblowers.

How to submit a report

Reports may be submitted either in writing or verbally. Upon request, it is also possible to hold an in-person meeting or, where an in-person meeting is not feasible, a videoconference.

Available reporting channels:

- Web Channel (secure form): https://canaldenuncias-dominion.midenet.es
- Postal Mail - Ethics Channel: Compliance Department, Plaza Pío Baroja 3, 1st Floor, 48001 Bilbao (Biscay), Spain.
- Postal Mail - Moral and/or Sexual Harassment Channel: People & Culture Department, Avenida del Partenón 16, 2nd Floor, 28042 Madrid, Spain.
- Meeting (upon the whistleblower's request): arranged through the web channel and/or verbal channel.

Anonymous reports

The IIS accepts anonymous reports. In such cases, whenever possible, a secure two-way communication channel (mailbox/identifier) will be maintained to request clarifications or additional information without compromising anonymity.

Essential principles of the case management procedure

DOMINION manages reports with diligence, traceability, and appropriate safeguards. In particular:

- Registration and Case File: The report is recorded, and a case file is opened with an identification code.
- Acknowledgement of Receipt: Within a maximum of 7 calendar days, unless the whistleblower has waived this right or acknowledgement could compromise confidentiality.
- Preliminary Assessment (Triage): A decision is made regarding admissibility, referral to another internal procedure, or reasoned closure.
- Internal Investigation: An investigator/team with sufficient independence is appointed, applying principles of necessity and confidentiality.
- Rights of the Person Concerned: Their rights of defense and to be heard are guaranteed; notification may be postponed where there is a risk of jeopardizing the investigation.
- Feedback to the Whistleblower: A response will be provided within a maximum period of 3 months, extendable up to 6 months in particularly complex cases, with any extension being documented and communicated where appropriate.

System safeguards

- Confidentiality and restricted access to the identity of the whistleblower, third parties, and all proceedings.
- Prohibition of retaliation and implementation of protection measures for whistleblowers and related persons.
- Presumption of innocence and respect for the rights of the persons concerned.
- Data protection: data minimization, restricted access, and retention in accordance with applicable regulations. For further information, please consult the Internal Information System Privacy Policy: https://www.dominion-global.com/en/privacy-policy

System manager

The person responsible for DOMINION's Internal Information System is the Ethics Committee, composed of representatives from the Risk, Compliance & Sustainability Department, the People & Culture Department, and the Legal Department.

External reporting channels

Without prejudice to the use of the IIS, whistleblowers may submit reports through external channels before the competent authorities.

Reference information

España: https://www.proteccioninformante.gob.es/en