## CHANGE CONTROL

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<th>Description of the change</th>
<th>Date</th>
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<td>V. 1.0</td>
<td>Original document</td>
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1 INTRODUCTION

1.1 Objective scope of application

The purpose of these Internal Reporting System Operating (hereinafter, the “OPERATING RULES”) is to establish, under the provisions of (i) Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption (hereinafter, “LAW 2/2023”); (ii) Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (hereinafter, “LOPD-GDD”); and (iii) any other applicable regulations, the procedure for confidential communication, and subsequent processing of any suspicions and/or facts relating to any action relating to the matters contained in Article 2 of LAW 2/2023 detected within the ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS (hereinafter, “BCAM”).

For this document, the Internal Reporting System (hereinafter, “INTERNAL REPORTING SYSTEM”) is understood to be the set of elements comprising the whistleblowing channel, the body responsible for its control and supervision, and the procedure that regulates its operation. For its part, the Whistleblowing Channel (hereinafter, “WHISTLEBLOWING CHANNEL”) is understood to be the mailbox or channel for the reception of communications.

1.2 Subjective scope of application

The WHISTLEBLOWING CHANNEL, as an integral part of the INTERNAL REPORTING SYSTEM, is made available to reporting persons working in the private or public sector who have obtained information on offences in an employment or professional context, as provided for in Article 3 of LAW 2/2023 (hereinafter referred to as the “INFORMANT(S)”).

1.3 Body responsible for the INTERNAL REPORTING SYSTEM

The addressee and person responsible for all communications, requests for information and/or consultations processed through the INTERNAL REPORTING SYSTEM shall be the Compliance Committee, as the body entrusted with its control and supervision, as well as the Compliance Officer, as the person delegated with the management of the INTERNAL REPORTING SYSTEM and the processing of investigation files.

2 LEGAL STATUS OF THE INTERNAL REPORTING SYSTEM

The INTERNAL REPORTING SYSTEM, its operation and the system of rights, duties, guarantees, conditions of access and use of the same by its users shall be governed by the provisions of the RULES OF OPERATION and by the provisions contained for this purpose in LAW 2/2023 and in the LOPD-GD-DD.

In addition, and insofar as it is planned to be made available on the BCAM website accessible to Internet users through the corresponding electronic URL address (hereinafter, the “WEBSITE”), the
WHISTLEBLOWING CHANNEL shall also be governed, in a complementary manner and as applicable, by the Terms of Use and Privacy Policy of the WEBSITE.

INFORMANTS who access and use the WHISTLEBLOWING CHANNEL must use it diligently and correctly, always under current legislation.

In any case, BCAM shall be considered responsible for the INTERNAL REPORTING SYSTEM under the conditions and powers provided in the RULES OF OPERATION and may modify its configuration, access, operation and content at any time.

3 BASIC PRINCIPLES OF THE INTERNAL REPORTING SYSTEM

The INTERNAL REPORTING SYSTEM is based on the following principles:

3.1 Principle of good faith

INFORMANTS must act in good faith and not make false accusations. Good faith is deemed to exist when:

- It is made based on facts or evidence from which irregular, unlawful or anomalous conduct may reasonably be inferred or
- Even if the INFORMANT does not have proof or evidence, the communication may be considered in good faith if it is made to safeguard the interests of BCAM or the legislation in force and if it is made without any intention of retaliation, moral harassment, harm to work or professional interests, or damage to the honour of the persons involved or of a third party.

If any of the INFORMANTS deliberately makes false or misleading statements or in bad faith, it may lead to:

(i) Disciplinary actions under the provisions of the Disciplinary and Sanctioning Rules established by BCAM and/or provided for in the legislation in force;
(ii) The activation of contractual penalty clauses, if any; and/or
(iii) Its transfer to the judicial authority or the Public Prosecutor’s Office.

3.2 Prohibition of reprisals

Without prejudice to the provisions of the previous paragraph, BCAM prohibits reprisals of any kind against the INFORMANTS, as well as against any of the persons listed in Article 3 of the LAW 2/2023.

Retaliation is any act or omission prohibited by law or that, directly or indirectly, entails unfavourable treatment that places the persons who suffer it at a particular disadvantage concerning another person in the work or professional context, solely because of their status as INFORMANTS or because they have made a public disclosure.
If it is confirmed that the INFORMANT or any persons referred to in Article 3 of LAW 2/2023 have suffered reprisals, the corresponding investigation will be initiated against the perpetrator(s), who, if applicable, will be sanctioned.

3.3 **Anonymity**

INFORMANTS may choose to make communications through the WHISTLEBLOWING CHANNEL in a completely anonymous way.

3.4 **Confidentiality and protection of personal data**

The communication and identity of the INFORMANT of the defendant person and any other person involved in the investigation procedure originated by the INFORMANT’s communication will be, in any case, confidential.

Likewise, confidentiality is guaranteed when a communication is sent by means other than the WHISTLEBLOWING CHANNEL or to staff members not assigned to manage such communications. Should this occur, the recipient of the communication must immediately refer it to the Compliance Officer or, in the event of a conflict of interest, may refer it directly to any member of the Compliance Committee.

To ensure confidentiality, the following safeguards are put in place:

- The identity of the participants may not be revealed without their individual consent.
- Only the persons referred to in Article 32 of LAW 2/2023 may know the identity of those involved.
- Improper disclosure of this information will be subject to disciplinary sanctions and may be brought to the attention of the Public Prosecutor’s Office, as it may constitute a criminal offence.

Only if the reported event constitutes a criminal offence shall the identity of those involved in the investigation procedure triggered by the report be disclosed to the competent judicial or administrative authority or the Public Prosecutor’s Office. If the facts affect the financial interests of the European Union, it will also be referred to the European Public Prosecutor’s Office.

In addition, and without prejudice to what is expressly established in this respect in the RULES OF OPERATION, BCAM shall duly comply with the other obligations which, under the applicable regulations on the protection of personal data, it is responsible for observing, in its capacity as Data Controller, the processing of data that it carries out through the INTERNAL REPORTING SYSTEM.

3.5 **Right to honour, presumption of innocence and the right to defence**

BCAM shall ensure such rights, guaranteeing the rights of the persons denounced to defend themselves against any accusations made against them with the maximum legal guarantees.
4 COMPLAINT PROCEDURE

4.1 Obligation to communicate and collaborate

The professionals who are members of BCAM, whatever their type of contract, hierarchical or functional position (hereinafter, the “PROFESSIONAL(S)”), shall be obliged to ensure compliance with current legislation and must report, when they are aware of or have reasonable indications of this, any action detected in BCAM that is contrary to the matters contained in Article 2 of LAW 2/2023.

Likewise, the PROFESSIONALS who are called upon to intervene shall be obliged to collaborate in the event of being required to do so within the investigations that may be carried out by the communications received through the WHISTLEBLOWING CHANNEL or by any other means by which they may become aware of a communication as provided in the RULES OF OPERATION. Failure to cooperate with the investigation, where there is an obligation, may lead to disciplinary sanctions.

The WHISTLEBLOWING CHANNEL may not be used for purposes other than those for which it was created.

4.2 Access to the WHISTLEBLOWING CHANNEL

The INFORMANTS may access the WEBSITE to the WHISTLEBLOWING CHANNEL and communicate in writing or verbally (hereinafter, the “COMPLAINT”).

In addition, a COMPLAINT can also be submitted in a face-to-face meeting within a maximum period of seven (7) calendar days from its request. Such a request shall be made to their superior and/or any of the Compliance Committee members.

Regardless of how the COMPLAINT is submitted, if it involves processing the INFORMANT’s personal data (non-anonymous COMPLAINT), compliance with the obligations to inform the INFORMANT and the lawfulness established in the applicable legislation on personal data protection must be ensured.

For this purpose, the information text for reference is attached to the RULES OF OPERATION as Annex 1.

4.3 Minimum content of the COMPLAINT

The COMPLAINT submitted must contain at least the following aspects:

▪ Identity of the defendant, name and surname, and, if known, their position in BCAM.

▪ Fact motivating the COMPLAINT: what the conduct complained of consists of, the approximate date on which it occurred, the date on which it was detected, and how it became known.

▪ Documents or means of proof that, where appropriate, are deemed necessary.
Furthermore, if the INFORMANT wishes, they may include any of the following aspects: the identity of the INFORMANT, how to contact the INFORMANT (address, e-mail or safe place to receive notifications), as well as any other aspect they consider relevant.

In any case, the COMPLAINT should be as descriptive as possible to facilitate identifying the defendant and/or the conduct complained of.

If more than one COMPLAINT is received concerning the same or related facts, the processing of these COMPLAINTS may be combined in a single procedure.

4.4 Other media

The WHISTLEBLOWING CHANNEL will be the preferred channel for reporting any action detected in BCAM contrary to the matters contained in Article 2 of LAW 2/2023.

However, those who make a COMPLAINT through the WHISTLEBLOWING CHANNEL will be informed, in a clear and accessible manner, of the external information channels with the competent authorities and, where appropriate, with the institutions, bodies, offices or agencies of the European Union. This reference shall be included in Annex 2.

If BCAM is made aware of any possible suspicions and/or facts relating to actions contrary to the matters contained in Article 2 of LAW 2/2023 by means other than the WHISTLEBLOWING CHANNEL or to members of staff not assigned to the management of the latter, this information must be immediately forwarded through the WHISTLEBLOWING CHANNEL.

4.5 Receipt of the COMPLAINT

Upon receipt of the COMPLAINT, acknowledgement of receipt shall be given within seven (7) calendar days unless such action may jeopardise the confidentiality of the COMPLAINT. In the acknowledgement of receipt, the INFORMANT shall be informed of the confidential nature of their identity (if they have provided it) with a warning that it will be communicated to the persons to whom the facts refer or to third parties. If the INFORMANT has chosen to identify themselves, the legally required information on personal data protection will be transferred to them per the terms set out in Annex 2.

4.6 Subsequent actions

4.6.1 Preliminary analysis of the COMPLAINT

Upon receipt of a COMPLAINT, the Compliance Officer or, in the event of a conflict of interest, any other member of the Compliance Committee must analyse and make a reasoned decision whether the report exposes possible suspicions and/or facts relating to actions contrary to the matters contained in Article 2 of LAW 2/2023.
Once this preliminary analysis has been carried out, any of the following actions shall be determined and communicated to the INFORMANT within a period not exceeding ten (10) calendar days from the receipt of the COMPLAINT:

- **Inadmissibility of the COMPLAINT in any of the following cases:**
  - When the facts are reported, they lack any credibility.
  - Where the facts or conduct reported are not contrary to the matters contained in Article 2 of LAW 2/2023.
  - When the COMPLAINT is manifestly unfounded, or there are, in the opinion of the Compliance Officer or, in the event of a conflict of interest, of the member of the Compliance Committee who received the COMPLAINT, reasonable indications that it was obtained through the commission of a criminal offence. In the latter case, in addition to the inadmissibility, a detailed account of the facts that constitute an offence shall be sent to the Public Prosecutor’s Office.
  - Where the COMPLAINT does not contain significant new information on infringements compared to a previous COMPLAINT for which the relevant internal and/or external procedures have been completed, unless there are new factual or legal circumstances that justify a different follow-up, the decision shall be notified in a reasoned manner.

- **Admission of the COMPLAINT.**

  In any case, BCAM shall observe the maximum retention periods for personal data in the WHISTLEBLOWING CHANNEL specified in Section 7 below.

4.6.2. **Investigation of the COMPLAINT and hearing of the defendant**

If there are indications that facts or conduct contrary to the matters contained in Article 2 of LAW 2/2023 have been committed, the Compliance Officer or, in the event of a conflict of interest, the member of the Compliance Committee who is hearing the COMPLAINT, who may request the corresponding collaboration of the other members of the Compliance Committee, must carry out the investigation, and may also be assisted by other members of BCAM or outsource part or parts to external collaborators who are experts in the matter, such as lawyers, auditors, IT specialists, etc. (to provide a greater degree of independence in specific processes that so require).

Thus, a confidential file will be opened, which will be initiated by notifying the COMPLAINT with a brief account of the facts within five (5) calendar days from the admission of the COMPLAINT, in which the accused will be informed of their right to be heard at any time during the investigation. In no case shall the INFORMANT’s identity be communicated to the respondent, nor shall access to the communication be given.

The defendant shall be informed of the right to submit written submissions. However, this information may be provided at the hearing if it is considered that its provision beforehand could facilitate concealment, destruction or alteration of
evidence.

For this purpose, a report shall be sent to the defendant in person and to their immediate superior, containing at least the provisions attached as Annex 3.

Parallel to the admission of the COMPLAINT, the person investigating it may urgently take the necessary measures to prevent the loss or manipulation of information and/or evidence provided or mentioned in the communication. Such measures may include, but are not limited to, the following actions:

- Suspension of access rights to computer equipment and systems, relevant documents, etc.;
- Audit of IT equipment and systems;
- Securing electronic evidence; and/or
- Temporary suspension of activity at a given location.

The defendant shall then be given a hearing. Internal investigations shall be carried out irrespective of the position/post, type and duration of the relationship of the professional under suspicion. Their rights, and in particular their privacy, their presumption of innocence and their honour must be respected at all times under the provisions of the legislation in force.

In addition to the INFORMANT and BCAM’s PROFESSIONALS, any third party who may know the situation under investigation may also be requested to collaborate in the processing of said file, and the PROFESSIONALS and third parties shall be informed of the information contained in Annex 4.

Once the person investigating the COMPLAINT has all the necessary information and/or documentation, they may call for interviews of persons related to the facts described in the COMPLAINT.

4.6.3. Research Methodology

The research methodology could consist of:

- Interviews with the persons allegedly responsible for the reported facts;
- Interviews with BCAM executives, managers and other professionals or with external people;
- Access to any records, files or documentation of BCAM and/or third parties;
- Information analysis, including computer forensics;
- Request for expert reports;
- Possibility to maintain communication with the INFORMANT and, if necessary, to request additional information from the INFORMANT and
• Any other measure necessary while respecting the law in force and the rights of those involved in the investigation.

The person investigating the COMPLAINT may have access to e-mails, files, calls made, internet history, check-in and check-out records, travel and expense records, backup of the computers concerned or any other procedure, in compliance, in all cases, with the applicable regulations. The collection and securing of electronic evidence must be carried out in such a way that it has the maximum evidential capacity, respecting technical and legal aspects, especially the provisions of the LOPD-GDD on Digital Rights and, more specifically:

• The principle of proportionality, the presumption of innocence, and the right to privacy of the defendant shall be respected;
• The right of the defendant to be present shall be respected;
• The possibility of a neutral third party, e.g. an employee representative, shall be ensured;
• The collection of electronic evidence shall be carried out by qualified personnel (computer forensics) to avoid accidental destruction of possible evidence;
• A record shall be made of all steps taken to ensure that the entire process of obtaining and securing evidence can be reconstructed in detail; and
• It shall be carried out in the presence of a notary or other notary that guarantees the chain of custody of the evidence to avoid any alteration.

Likewise, statements will be taken from those involved in the COMPLAINT, and minutes will be drawn up for each interview, which will be signed by those involved. The statements may be recorded on audiovisual support, if possible, and the signatures of the intervening parties may be obtained, who may also propose any evidence they consider appropriate to accredit the facts.

4.6.4. Issuance of a report

4.6.4.1 Preliminary report

Once the COMPLAINT has been investigated, the person who has investigated shall draw up a report sent to the Compliance Committee, which shall include at least the following issues:

• Statement of the facts reported together with the identification code of the COMPLAINT and the date of receipt of the COMPLAINT;
• The actions carried out to verify the plausibility of the facts;
• The legislation considered infringed; and
• Conclusions and measures, which may consist of any of the following proposals, to be approved by the Compliance Committee:
File closed for (i) lack of evidence; (ii) inability to determine who is responsible for the facts; or (iii) finding that no facts or conduct contrary to the matters contained in Article 2 of LAW 2/2023 have been committed;

Of any of the sanctions provided for in the Workers’ Statute and/or the BCAM Collective Bargaining Agreement in force at any given time, in which case, it shall be referred to the Directorate General for a decision to be taken, which shall be recorded in writing; and/or

Transfer to the corresponding police or judicial authorities without prejudice to the intervention of the Public Prosecutor’s Office in cases where the facts constitute a criminal offence. If the facts affect the financial interests of the European Union, a referral shall be made to the European Public Prosecutor’s Office. In any of these cases, it shall be referred to the Board of Directors for a decision, which shall be recorded in writing.

In any case, recommendations for improvement may be included to avoid or solve existing problems, and the Compliance Committee shall decide, where appropriate, on their adoption, which shall be recorded in writing.

4.6.4.2 Conclusions report

Once one of the above proposals has been approved, the person who has drawn up the investigation report must also draw up an anonymised conclusions report containing the relevant and summarised aspects of the report and the Compliance Committee’s proposal to be communicated to the INFORMANT and the reported person. For clarification purposes, the contents of the report of findings shall be as follows:

- Reported conduct together with the code identifying the COMPLAINT and the date of receipt of the COMPLAINT;
- A list of the evidence adduced to prove the plausibility of the conduct complained of and
- Resolution of the report, which shall be the proposal of the Compliance Committee approved by the corresponding body.

In any case, recommendations for improvement may be included to avoid or solve existing problems.

The conclusions report shall be sent to the Directorate General and, where appropriate, to the head of the department concerned so that they can implement the recommendations for improvement contained in the report.
4.6.4.3 Finalisation and delivery of reports

The finalisation of the reports and the communication of the conclusions report to the INFORMANT and the reported person must be carried out as soon as possible, and in any case, within a maximum period of three (3) months (i) as from the reception of the COMPLAINT; or (ii) if no acknowledgement of receipt has been sent to the INFORMANT, from the expiry of the seven (7) calendar day period after the COMPLAINT, except in cases of exceptional complexity that require an extension of the period, in which case, this may be extended up to three (3) additional months.

5 LENIENCY PROGRAMME

BCAM wants to promote a leniency programme, which aims to facilitate the detection of activities or attitudes contrary to the matters contained in Article 2 of LAW 2/2023, to strengthen and thus demonstrate to supervisors, regulators and judicial authorities a high level of commitment to the culture of compliance.

This programme is aimed at BCAM PROFESSIONALS responsible for or aware of infringements.

A BCAM PROFESSIONAL who reports to BCAM the commission of a past, actual or potential wrongdoing for which they are responsible, provided that their actions do not result in criminal consequences, and, in the opinion of the person investigating the COMPLAINT, provides either at the outset or during the investigation, adequate evidence to assist in the investigation to clarify questions about the involvement of other PROFESSIONALS or third parties, the extent of the wrongdoing, the harm to BCAM or the benefit to the wrongdoers and the duration of the wrongdoing, may benefit from a substantial reduction in the penalty that may be imposed.

The PROFESSIONAL in question may benefit from the leniency programme, provided the following points are proven in the file:

- To have ceased to infringe at the time of the filing of the COMPLAINT, or disclosure and identification, where appropriate, of the other persons who participated in or favoured the infringement;
- Have cooperated fully, continuously and diligently in the investigation procedure;
- Having provided truthful and relevant information, means of proof or significant data for the accreditation of the facts under investigation, without having proceeded to their destruction or concealment, or having revealed their content directly or indirectly, to third parties; and
- Have made reparation for the damage caused, where possible.

When these requirements are not met in full, including partial reparation of the damage, the Compliance Committee may, after assessing the contribution to the case’s resolution, decide to mitigate the sanction that would have corresponded to the offence committed, provided the perpetrator of the disclosure has not previously been sanctioned for acts of the same nature that led to the initiation of the proceeding.
As a general rule, this programme will not apply to the managers and heads of BCAM’s various departments.

6 SECURITY OF COMPLAINTS

All communications made under the RULES OF OPERATION must adopt appropriate security measures, especially certificates, acknowledgements of receipt or encryption.

7 PRESERVATION OF INFORMATION

The personal data of the INFORMANT, the defendant, and any other person whose personal data appear in the COMPLAINT shall be kept in the INTERNAL REPORTING SYSTEM only for the time necessary to decide whether to investigate the facts contained in the COMPLAINT.

In any case, three (3) months after the presentation of the COMPLAINT without any investigation, the personal data must be deleted from the INTERNAL REPORTING SYSTEM (unless it is decided to keep them to evidence the functioning of the same). The COMPLAINTS that have not been followed up may only be recorded anonymously, without the blocking obligation provided for in Article 32 of the LOPD-GDD being applicable.

BCAM shall keep a register of the COMPLAINTS received and internal investigations that have taken place, guaranteeing in all cases the confidentiality requirements and observing, where appropriate, the obligations of anonymisation indicated above. This register shall not be public, and only at the reasoned request of the competent judicial authority, through an order within the framework of judicial proceedings and under the guardianship of that authority, may access all or part of the contents of the said register.

If it is established that the information provided through the WHISTLEBLOWING CHANNEL, or part thereof, is not truthful, it must be immediately deleted as soon as this circumstance comes to light, unless this lack of truthfulness could constitute a criminal offence, in which case the information will be kept for the necessary time during the legal proceedings.

Personal data not necessary for processing specific information or collected by accident should also be deleted immediately.

Data may not be kept for more than ten (10) years.

8 ENTRY INTO FORCE AND VALIDITY OF THE RULES FOR THE OPERATION OF THE INTERNAL REPORTING SYSTEM

The Board of Directors of BCAM approved the RULES OF OPERATION on 9 June 2023, coming into force immediately and remaining in full force and effect as long as no changes are made thereto.
The communication form made available to the INFORMANT through the WEBSITE must include the information set out below as a guideline:

## Basic data protection information

<table>
<thead>
<tr>
<th>Data owner</th>
<th>ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Purpose</strong></td>
<td>Handle your complaint and, if necessary, carry out the corresponding investigation.</td>
</tr>
<tr>
<td><strong>Rights</strong></td>
<td>You have the right to oppose the processing, access, rectify and delete the data, and exercise other legally established rights in a written request addressed to ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS by post or e-mail to <a href="mailto:gdpr@bcamath.org">gdpr@bcamath.org</a></td>
</tr>
<tr>
<td><strong>Additional information</strong></td>
<td>Additional and detailed information on Data Protection can be found in the Section Privacy Policy.</td>
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ANNEX 2

ACKNOWLEDGEMENT OF RECEIPT OF COMPLAINT

ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS (hereinafter, "BCAM") thanks you for your cooperation and takes this opportunity to provide you with the following relevant information regarding the complaint filed and its handling by BCAM:

- BCAM will ensure your right to honour is respected, and will maintain its commitment not to retaliate for communication made in good faith.
- The confidentiality of your communication will be guaranteed at all times following (i) the protocols and good practices established in BCAM; and (ii) the applicable regulations in force.
- Your identity, if you have communicated it, will be treated as confidential and will not be communicated to the persons to whom the facts relate or to third parties.
- If the complaint was made in a face-to-face meeting, it should be noted that, as you have been informed, it has been recorded.
- You have external channels of information from the Independent Authority for the Protection of Whistleblowers, A.A.I., from the Autonomous Community Authority, as well as from the institutions, bodies or agencies of the European Union, to which you can report any action contrary to the matters set out in Article 2.1 of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption (hereinafter, "LAW 2/2023").
- Your personal data, if you have provided it through the Whistleblowing Channel and/or in a face-to-face meeting, will be processed by BCAM under the following terms:

<table>
<thead>
<tr>
<th>Data Controller</th>
<th>ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS</th>
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<tbody>
<tr>
<td>DPO</td>
<td>BCAM has appointed a Data Protection Officer (DPO) who can be contacted via e-mail at <a href="mailto:gdpr@bcamath.org">gdpr@bcamath.org</a></td>
</tr>
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</table>

- **Type of data processed**
  - Identifying data.
  - Voice (recording of face-to-face meeting).
  - Data on personal characteristics.
  - Social circumstances data.
  - Job details.

- **Purpose of processing**
  Handle your complaint and, if necessary, carry out the corresponding investigation.
<table>
<thead>
<tr>
<th><strong>Legitimation of the processing</strong></th>
<th>Fulfilment of legal obligations (Art. 30.2 LAW 2/2023)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Conservation periods</strong></td>
<td>Your data will be kept in the Whistleblowing Channel for the time necessary to decide whether to process or archive the communication and, in any case, for 3 months. In addition, your data may be retained outside the Whistleblower Channel for the duration of the investigation of the relevant proceedings, for the additional legal periods observed in such cases by BCAM.</td>
</tr>
<tr>
<td><strong>Data communications</strong></td>
<td>Access to the personal data contained in the Internal Reporting System shall be limited, within its competences and functions, exclusively to the persons referred to in Article 32 of Law 2/2023.</td>
</tr>
<tr>
<td><strong>Data protection rights</strong></td>
<td>You may exercise the following data protection rights by sending a written request to BCAM by post or to the e-mail address <a href="mailto:gdpr@bcamath.org">gdpr@bcamath.org</a>:</td>
</tr>
<tr>
<td></td>
<td>▪ <strong>Access to your data</strong>: you have the right to access your data to find out what personal data we are processing.</td>
</tr>
<tr>
<td></td>
<td>▪ <strong>Request the rectification or deletion of your data</strong>: you have the right to rectify any inaccurate personal data concerning you that we process, or even request its deletion when appropriate under the applicable regulations.</td>
</tr>
<tr>
<td></td>
<td>▪ Request to restrict the processing of your data: in certain circumstances, you have the right to ask us to restrict the processing of your data.</td>
</tr>
<tr>
<td></td>
<td>▪ <strong>Object to the processing of your data</strong>: in certain circumstances and for reasons related to your particular situation, you have the right to object to the processing of your data, in which case we will stop processing it unless, for compelling legitimate reasons, or the exercise or defence of any claims, the data must be kept.</td>
</tr>
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</table>

Likewise, you may lodge a complaint with the competent Control Authority (in the case of BCAM, the Basque Data Protection Agency), primarily when you have not obtained satisfaction in exercising your rights. The Authority can be contacted via its website: [www.avpd.euskadi.eus](http://www.avpd.euskadi.eus).
Dear employee:

We hereby inform you that, following the corresponding communication received in the Whistleblowing Channel of ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS (hereinafter, “BCAM”), an investigation procedure is being carried out for facts that could be attributed to you with the following indicative content: [BRIEF DESCRIPTION OF THE FACTS AND THE PRECAUTIONARY MEASURES TAKEN, IF ANY].

We hereby summon you on [...], [day of the week], at [location] for a hearing to clarify the facts under investigation and ensure legitimate respect for your rights of defence, presumption of innocence and honour.

At this hearing, you will be told the facts that are the subject of the communication and asked about your version of the facts. You can use whatever evidence you consider appropriate to prove your allegations.

In any case, you are informed that you have the right:

- To be heard at any time to submit written allegations, provide any documents or information they consider appropriate, and consult the investigation documents as soon as possible to ensure the investigation’s proper conduct.

- To be informed of the end of the investigation and that the statements may be forwarded to the judicial authority and/or the Public Prosecutor’s Office.

- To remain silent on questions that may lead to an assumption of responsibility regarding an investigation.

- That the information obtained from the defendant is not used for any purpose other than the one initially indicated.

- To have a lawyer or workers’ representative.

We also provide you with the following information regarding your obligations in the framework of the aforementioned procedure:

- You are prohibited from deleting or modifying documents or data of any kind in your possession or the possession of third parties, whether in physical or electronic form.

- You are expressly forbidden to contact the internal or external personnel of the company to discuss any matters relating to the ongoing investigation, with the express obligation to maintain confidentiality, except for legal advisors and/or independent experts who may assist in the defence of the investigation. Without prejudice to the outcome of the investigations, any violation by you of the precautions noted in this report will lead to the corresponding disciplinary measures, without prejudice to the filing of the appropriate report with the Security
Forces and Corps, the Public Prosecutor’s Office or the corresponding investigating court, for the destruction of evidence in the most serious case.

- You must hand over the computer, external memory, internal and removable hard disks, mobile phone or other device owned by the company that has been provided to you.
- You will be granted paid leave from today and remain at the organisation’s disposal at all times.

The management of such research will involve the processing of your personal data in the following terms:

<table>
<thead>
<tr>
<th>Data Controller</th>
<th>ASOC. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS</th>
</tr>
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<tbody>
<tr>
<td>DPO</td>
<td>BCAM has appointed a Data Protection Officer (DPO) who can be contacted via e-mail at <a href="mailto:gdpr@bcamath.org">gdpr@bcamath.org</a></td>
</tr>
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</table>

**Type of data processed**
- Identifying data.
- Data on personal characteristics.
- Social circumstances data.
- Job details.
- Signature

**Purpose of processing**
Attention and investigation of the alert received in the Whistleblowing Channel and, where appropriate, investigation of the corresponding procedure.

**Legitimation of the processing**
Fulfilment of legal obligations (Art. 30.2 LAW 2/2023)

**Conservation periods**
Your data will be kept in the Whistleblowing Channel for the time necessary to decide whether to process or archive the communication and, in any case, for 3 months.

In addition, your data may be retained outside the Whistleblower Channel for the duration of the investigation of the relevant proceedings for the additional legal periods observed in such cases by BCAM.

**Data communications**
Access to the personal data contained in the Internal Reporting System shall be limited, within its competences and functions, exclusively to the persons referred to in Article 32 of LAW 2/2023.

**Data protection rights**
You may exercise the following data protection rights by sending a written request to BCAM by post or by sending an e-mail to gdpr@bcamath.org:
• Access to your data: you have the right to access your data to find out what personal data we are processing.

• Request the rectification or deletion of your data: you have the right to rectify any inaccurate personal data concerning you that we process or even request its deletion when appropriate under the applicable regulations.

• Request to restrict the processing of your data: in certain circumstances, you have the right to ask us to restrict the processing of your data.

• Object to the processing of your data: in certain circumstances and for reasons related to your particular situation, you have the right to object to the processing of your data, in which case we will stop processing it unless, for compelling legitimate reasons, or the exercise or defence of any claims, the data must be kept.

Likewise, you may lodge a complaint with the competent Control Authority (in the case of BCAM, the Basque Data Protection Agency), primarily when you have not obtained satisfaction in exercising your rights. The Authority can be contacted via its website: www.avpd.euskadi.eus.
Dear __________,

Following the corresponding communication received in the Whistleblowing Channel of the ASOC, we inform you. BCAM - BASQUE CENTER FOR APPLIED MATHEMATICS (hereinafter, "BCAM") is conducting an investigation procedure, and we need your cooperation to clarify the reported facts.

BCAM would like to thank you for your cooperation and would like to take this opportunity to provide you with the following information:

- BCAM guarantees at all times the confidential, independent and objective treatment of all communications received through the Whistleblowing Channel or by any other means by which communication may come to its attention.
- In all cases, your identity and any information you provide concerning your report’s facts shall be kept confidential and may not be disclosed without your consent.
- Under no circumstances may you disclose any matter you need to become aware of as a party to the investigation.
- Improper disclosure of any matter relating to the investigation will be subject to disciplinary sanctions.
- You must cooperate with the investigation. Failure to do so may result in disciplinary sanctions being imposed by BCAM.
- You have the document relating to the Internal Reporting System General Rules of Use on BCAM’s website, which details the procedure for confidential communication and subsequent processing of any suspicions and/or acts contrary to current legislation committed at BCAM.
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- **Type of data processed**
  - Identification data (name, surname, ID card number, etc.).
  - Voice (recording of face-to-face meetings, if applicable).
  - Data on personal characteristics.
  - Social circumstances data.
  - Job details.
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  - **Object to the processing of your data**: in certain circumstances and for reasons related to your particular situation, you have the right to object to the processing of your data, in which case we will stop processing it unless, for compelling legitimate reasons, or the exercise or defence of any claims, the data must be kept.  
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Date, place and signature  
Name and surname