

WHISTLEBLOWING CHANNEL

Neinor Homes has an Ethics Channel available on the [corporate website \(canal.etico@neinorhomes.com\)](mailto:canal.etico@neinorhomes.com), which has been in operation since 2015 and is available 24/7 from anywhere in the world and in all languages spoken in the Group.

The channel is accessible and available to any interested party who wishes to report any fact that may constitute a breach of legal obligations, the Code of Ethics or the Code of Conduct for third parties of the Neinor Homes Group. The anonymity and confidentiality of all communications received is guaranteed, to ensure that there is no retaliation of any kind against the whistleblower for having made the communication.

Complaints received in 2021

In 2021, 3 complaints were received in the Ethics Channel, which were investigated and resolved within an average of 5 working days, complying with the deadline established by the Complaints Management Procedure.

The detail of these complaints received is shown below:

Complaint No.	Reason for the complaint	Resolution	Actions taken
1	A potential client complains that the marketer of a land in which he was interested did not respect the order during the negotiation process for its sale: it took 3 months to reply to the client's offer indicating the minimum price for which it would be sold, the client informed him that he accepted, and the marketer informed him that there was already an accepted offer from another client.	During the investigation of the facts, the marketer sends us e-mails previously manipulated by him to justify his malpractice and a bad way of proceeding on the part of the commercial manager is also detected.	The marketing contract with the marketer is terminated and the commercial manager is warned. The complainant is informed of the resolution of the investigation and the closure of the complaint.
2	A Neinor Experience technician denounces an abuse suffered by a cleaning employee of one of our developments by the construction manager of that development.	The aggrieved party is contacted and all the information on the events that occurred is gathered. The construction manager is immediately removed from the site.	The complainant is informed of the action taken and the closure of the complaint.
3	A potential client complains because he had left a deposit to reserve a property that he was unable to purchase because it was already reserved for another client who had obtained financing for the purchase.	After carrying out the appropriate investigations and contacting the marketer, it was concluded that there was no fraud or malpractice because there was already a sales contract signed with another customer.	The complainant is informed of the closure of the complaint and the reasons for it, as well as a commitment to notify the complainant if the sale is not completed.

No complaints have been received regarding discrimination, human rights violations, corruption or bribery, or breaches of the Code of Ethics.

All complaints were reported to the Audit Committee as part of the Annual Report on Compliance Activities.