



# **Protocol for the internal reporting system or ethics channel**

The Ethics Channel is one of the essential components of BRUTAL MEDIA's Compliance Programme and aims to prevent, detect, investigate, and sanction any violations and illegal activities that may occur by members and collaborators of BRUTAL MEDIA.

All members of BRUTAL MEDIA and those with whom BRUTAL MEDIA maintains business relationships must adhere to both the prevailing laws and the BRUTAL MEDIA's own Code of Ethics and other approved internal regulations.

## **2. WHO CAN REPORT?**

This Ethics Channel can be used by any person, whether internal or external to BRUTAL MEDIA, who has become aware of a breach of the prevailing law, the BRUTAL MEDIA's own Code of Ethics, or other internal regulations of BRUTAL MEDIA.

## **3. WHAT CAN BE REPORTED?**

Through this Ethics Channel, information can be submitted about actions that are contrary to the BRUTAL MEDIA's Code of Ethics or other internal regulations, as well as those that may constitute a breach of the prevailing law, so that they can be properly investigated and, where appropriate, sanctioned.

This channel is not intended to address issues related to complaints about the services provided by BRUTAL MEDIA.

## **4. GUARANTEES FOR WHISTLEBLOWERS**

A secure system is available to the whistleblower, ensuring:

1. The possibility to report verbally or in writing.
2. The option to remain anonymous.
3. The right of the whistleblower not to suffer reprisals for information provided in good faith.
4. The ability for the whistleblower to check the status of their report and to know whether the investigation concludes that there has been a breach of the applicable regulations of BRUTAL MEDIA or its internal regulations.
5. That the information provided will be kept confidential and the whistleblower's identity will not be disclosed to third parties except as required by the judicial

authority, the Public Prosecutor's Office, or the competent administrative authority in the context of a criminal, disciplinary, or sanctioning investigation.

## **5. HOW TO FILE A REPORTO PRESENTAR UNA DENUNCIA**

Reports can be submitted via the following email address: [reportes@brutalmedia.tv](mailto:reportes@brutalmedia.tv)

## **6. HANDLING THE REPORT**

Upon submission of information through the Ethics Channel, an acknowledgement of receipt will be sent within five working days of receiving the report, unless the whistleblower declines to receive any communication or if doing so might jeopardise the protection of their identity.

The Ethics Channel Manager will assess the credibility of the information received and its potential for being an infraction within 15 days of receiving the information. If the report is deemed not credible, the whistleblower will be informed of its dismissal and any additional measures taken.

If the information provided is insufficient, further details may be requested.

If the report is considered credible, an internal corporate investigation will be initiated, ensuring that the accused persons' rights to the presumption of innocence, defence, and contradiction are upheld. In no case will the identity of the whistleblower be disclosed to the investigated persons.

## **7. WHAT INFORMATION SHOULD THE REPORT INCLUDE?**

The whistleblower should provide as much information as possible about the facts being reported. Ideally, the following information should be submitted:

- Description of the reported facts.
- Identities and positions of those involved.
- Date.
- Where applicable, identities of possible witnesses.
- Where applicable, supporting documentation of the reported facts.
- If it is not an anonymous report, the name and surname of the whistleblower, email address, postal address, and telephone number.

## 8. DATA PROTECTION

comprehensive management of the Internal Information System and the Ethics Channel, as well as other processes (such as exercising rights, reporting security breaches, or violations of the Code of Ethics) that you will access.

The legal basis for this processing is the fulfilment of BRUTAL MEDIA's legal obligations (Article 6.1.c) GDPR) or the public interest (Article 6.1.e) GDPR), if applicable, in accordance with Law 2/2023.

We will process your personal data solely for the purpose of investigating the reported incidents confidentially and taking appropriate measures within the framework of the applicable legislation, as well as resolving your request in case of other matters.

You can exercise the rights of access, rectification, erasure, objection, restriction of processing, or oppose processing in legally permitted cases, as well as the right to data portability in the terms specified by the current regulations, by contacting the Responsible for the Internal Information System via email at [reportes@brutalmedia.tv](mailto:reportes@brutalmedia.tv) or at the registered office located at Calle del Berlinés, 46, 08022, Barcelona, Spain. If the right of access is exercised by the person to whom the facts are attributed, this will not include the right to access the whistleblower's identifying data.

Access to the data contained in the Internal Information System will be limited to BRUTAL MEDIA, as the data controller. In this case, BRUTAL MEDIA will grant access to the data contained according to the content of the report to the appropriate department or management.

The whistleblower's data will also be known by the legal officer, without prejudice to the external legal team if necessary throughout the process, as well as the relevant judicial or police authorities.

The data processing will have the following scope:

1. Recording communications received through the Ethics Channel.
2. Retention of the data received. The data retention period will be strictly limited to the time necessary to decide whether to initiate an investigation, and shall not exceed three months or, in any case, ten years, in accordance with Article 26.2 of Law 2/2023.
3. Deletion of the data received in the following cases:

- After three months from the receipt of the communication without initiating any investigative actions, unless the purpose of retention is to provide evidence of the operation of the Internal Information System.
- When the data pertains to conduct that does not constitute any type of infringement.
- When the information received contains personal data included within the special categories of data.
- If it is proven that the information provided, or part of it, is not accurate.