

Complaint management process

I. Confirmation of receipt

During the first five working days after the complaint has been made, PronoKal Group's Compliance Department will confirm its receipt. If necessary, the complainant may be asked to provide clarification and/or additional information.

After the complaint is filed, an identification number will be provided in order to track the processing of the complaint in question.

II. Classification

All complaints received will be thoroughly reviewed and analysed. In the case that a complaint is supported by sufficient evidence and is plausible, an investigation will be launched. In the vast majority of cases, the complaint will be assigned to the Compliance Officer, who will lead the investigation into the events pertaining to the case.

III. Confidential investigation process

The object of the investigation is to determine, to the greatest extent possible, the truthfulness of the reported events and if they constitute a breach of company policies or the law and the identity of the person or persons responsible for said breach.

All investigations will be conducted in a confidential manner. However, information considered strictly necessary for the benefit of a full investigation may be shared with the smallest number of individuals possible.

IV. Decision and notification

Once the internal investigation has been carried out, a decision will be made as to whether a breach has taken place, which will subsequently lead to the necessary actions being taken.

As a last step, the complainant will be notified of the outcome of the investigation, except in circumstances where the company deems it necessary to classify as confidential the outcome of the investigation.