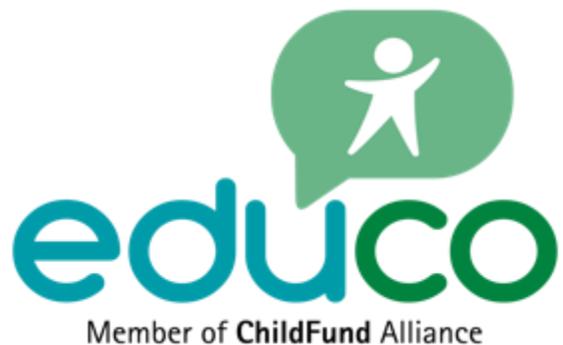




COMPLIANCE COMMITTEE

Regulations for the Whistleblowing Channel
User-friendly version
REGGOV02EN

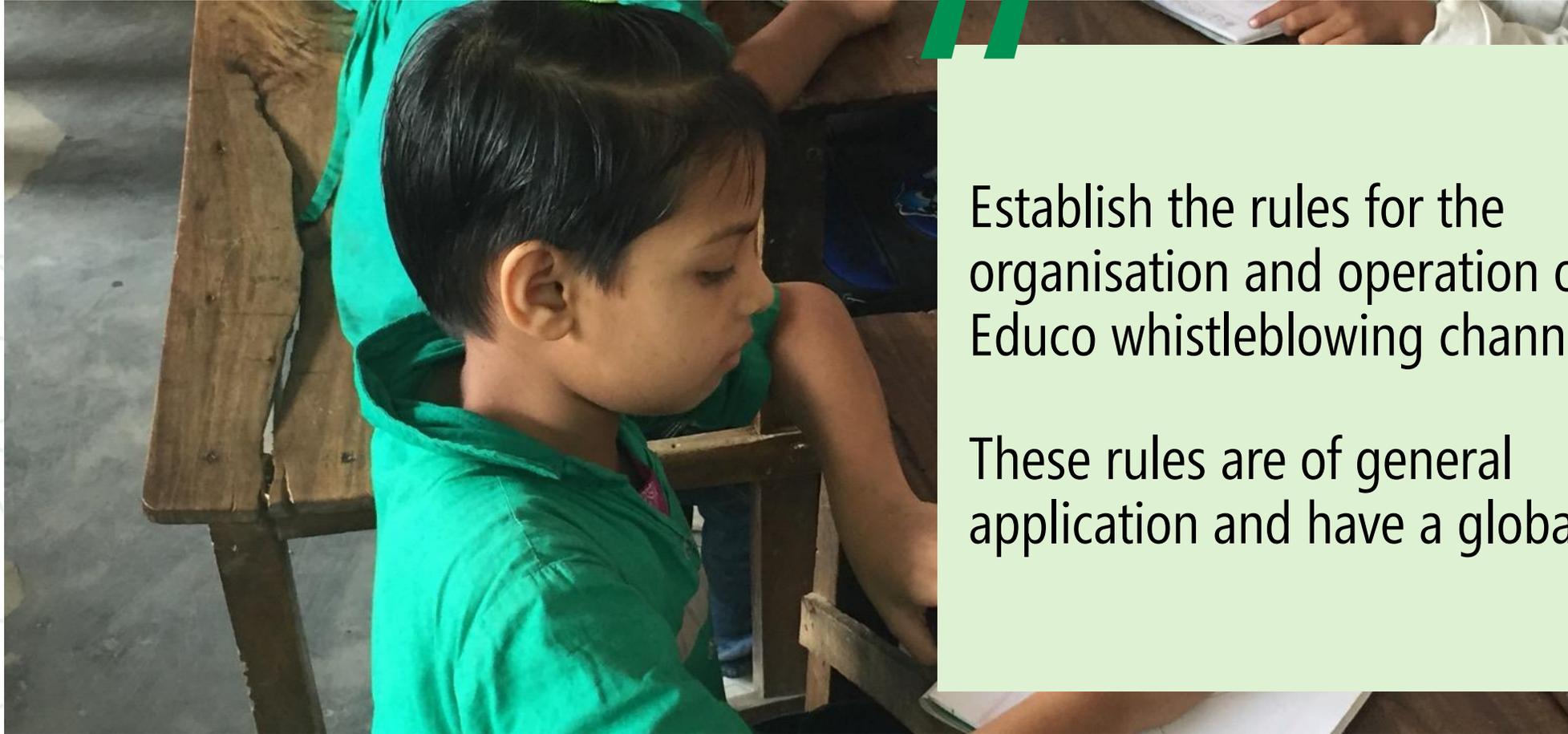


COMPLIANCE COMMITTEE

Regulations for the Whistleblowing Channel

REGGOV02EN

What is the aim and scope of the regulations?



Establish the rules for the organisation and operation of the Educo whistleblowing channel.

These rules are of general application and have a global scope.

Glossary of terms



Bring to the attention of the organisation any indication or reasonable suspicion of irregularity, and/or action contrary to the law, breach of commitments or contractual obligations assumed and/or internal regulations, as well as any type of irregular, illicit or criminal conduct.



Actions in breach of the law, of contractual commitments or obligations undertaken and of internal regulations.
For example: avoiding paying tax, not complying with confidentiality duties, acting against Educo's principles and values, etc.



Mechanisms that enable us to receive suggestions, complaints and commendations about the work Educo does.



Child Safeguarding Policy with focal points in the different countries Educo works in.



Policy on prevention and response to sexual exploitation, abuse and harassment.



Policy that establishes the ethical and action framework which the common Security Management System for the entire Educo Foundation is based on.

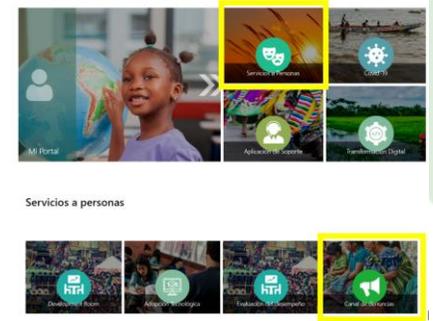


Policy that establishes the criteria and institutional position in relation to the prevention, detection and response to fraud and corruption.

What are the channels for receiving reports?



Through the “WHISPLI” platform that Educo has available on its **website** (URL: <https://educowhispli.com/report>) and on its intranet **IRIS**, using any device (PC, tablet, mobile telephone).



A report can be sent to any Educo office addressed to the CC.



Post

Through the Security, Safeguarding and Anti-Fraud focal points (and any others that may be implemented) in the different countries, who must inform the Compliance Committee, through the WHISPLI platform, of any complaint received, with the exception of minor reports, within a maximum period of 24 hours.



If the person reporting does not have digital tools they can use the SCC mechanisms, who must then communicate any reports received to the CC using the “WHISPLI” platform within a maximum period of (24) hours after receipt.

What are the principles that govern the operation of the whistleblowing channel?

Accessibility

The **communication channels** for receiving reports will be clear, public and easily accessible for third parties.

Good faith

The person reporting acts in good faith when the report is based on **facts or reasonable indications** of irregular, unlawful or criminal behaviour or behaviour contrary to the principles and values of the organisation.

Transparency

Whistleblowing channels are transparency tools that favour people's **participation** and **communication** and reinforce their **trust** in the organisation.

Who are the actors and what are their responsibilities in the management of the whistleblowing channel?



Compliance Committee (CC)

Their main responsibilities are:

- Operational management of the Whistleblowing Channel
- Adopt, or propose that Executive Management or the Board adopt the decisions resulting from the processing of reporting files.
- Regularly inform the Board about reports received.



External Legal Service

Independent legal adviser specialising in regulatory compliance and/or criminal compliance programmes.



External Expert

Professional who provides specialised advisory or consultancy services on specific subjects or fields.



Executive Management

Ensures compliance with regulations, adopting ordinary resolutions arising from reporting procedures.



Board

The highest authority responsible for the organisation's regulatory compliance. It adopts any extraordinary resolutions arising from the reporting procedures.



Focal Points

Partners in the different countries who receive the reports, manage them and communicate them to the CC through the "WHISPLI" platform within 24 hours of receipt, with the exception of reports classified as minor.



SCC Committees

If the person reporting does not have digital tools they can use the SCC mechanisms. The SCC Committees must communicate these to the CC using the "WHISPLI" platform within 24 hours of receipt.

What can be communicated through the whistleblowing channel?



Any indication or reasonable suspicion the commission may have regarding irregularity and/or action contrary to the **law**, any breach of **commitments or contractual obligations** assumed and/or **internal regulations**, as well as any type of irregular, illicit or criminal conduct.



Who can report?

Any person: employees, participants, volunteers, partners, suppliers, supporters, beneficiaries, etc.



Who can be reported?

Anyone linked to and/or directly or indirectly related to Educo.

What information can be communicated in the reports?

Reported facts

- A description, as detailed as possible, of the facts that are the subject of the report (facts, persons involved, when and where they happened, etc.).
- Any attached supporting documents (if applicable).

Contact details

- We recommend providing contact details for better handling of the reports.

Anonymous reports

- Anonymous submissions are permitted, although their processing may be limited due to the impossibility of verifying their accuracy.

Protection and control measures



Accompaniment for victims

Particular attention will be paid to protecting the victim and restoring the rights violated as a result of the reported situation.



Protection for the person reporting, victims, witnesses and the defendant.

Reporting person, victims and witnesses shall be protected against any kind of retaliation, discrimination and criminalisation.

The rights of the defendant, in particular the presumption of innocence, the right of defence and the principle of adversarial proceedings, will also be respected.



Conflict of interest

In the event of a conflict of interest, the person concerned will have to declare it and refrain from participating in the reports procedure.



Confidentiality

Educo guarantees the utmost confidentiality of all report information and sufficient physical and IT security measures will be taken.

Protection and control measures



Personal data protection

Educo will process the personal information provided by the person reporting solely for the purpose of handling the reports made.



Document conservation

All communications received, reports and resolutions will be recorded and archived to ensure traceability of actions taken.



Information for the Communication Department

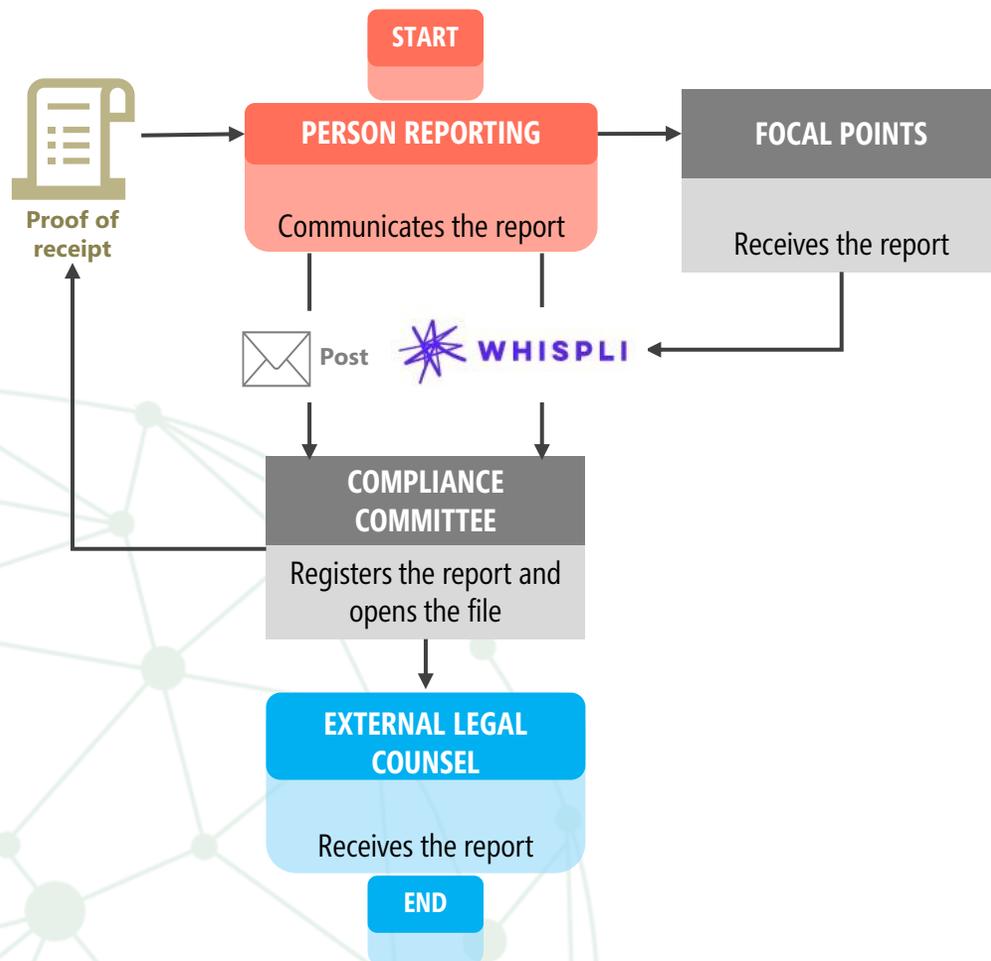
When a report is received, Executive Management can decide if it communicates the report to the Communication Department so that it can consider whether or not it initiates any communication actions or activates any of its protocols.



Information for the Board

At least once a year, the Compliance Committee will report to the Board of Trustees on the reports received, their classification and relevance, their resolution and, where appropriate, the measures adopted.

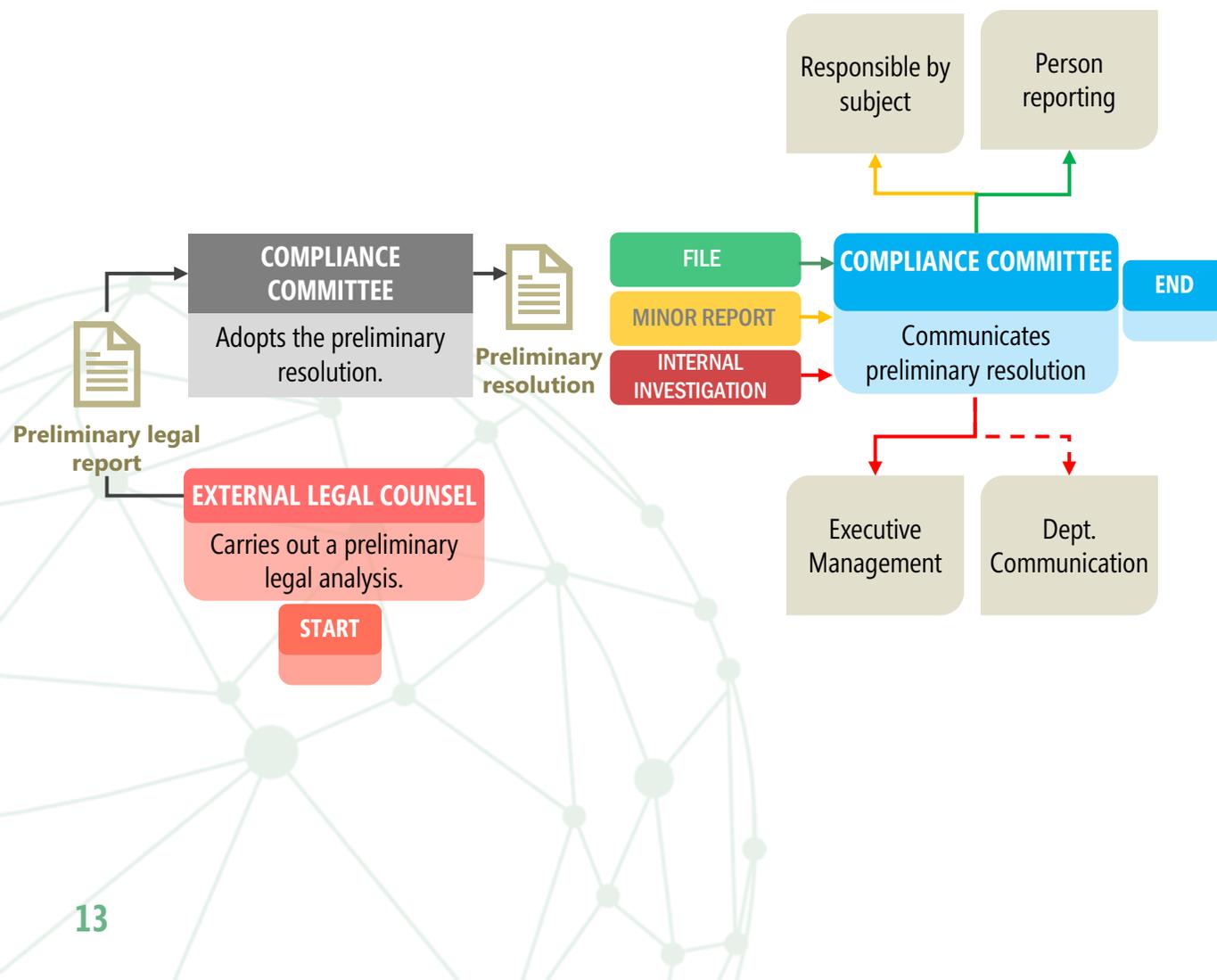
Reporting procedure



PHASE 1: RECEPTION

Reports will be received by the Compliance Committee and forwarded to the External Legal Counsel for prior analysis.

The Compliance Committee will register the report, open a file and send a receipt to the person who has reported.



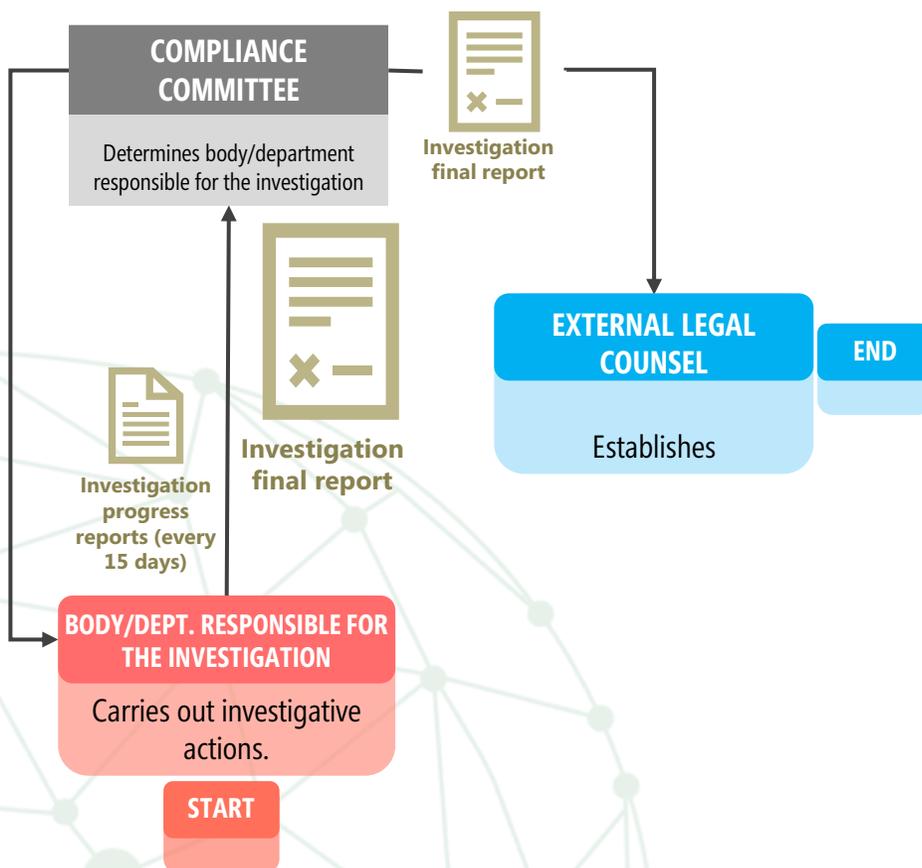
PHASE 2: PRIOR ANALYSIS

The External Legal Counsel will carry out a **preliminary legal analysis**.

On the basis of this analysis, the Compliance Committee shall adopt a corresponding **preliminary resolution**:

- a) File the report.
- b) Send the report classified as minor to the person responsible for processing in accordance with the internal procedure.
- c) Initiate an internal investigation process, in which case it shall inform the Executive Management and may also inform the Communications Department at the request of the Executive Management.

PHASE 3: DIAGNOSIS

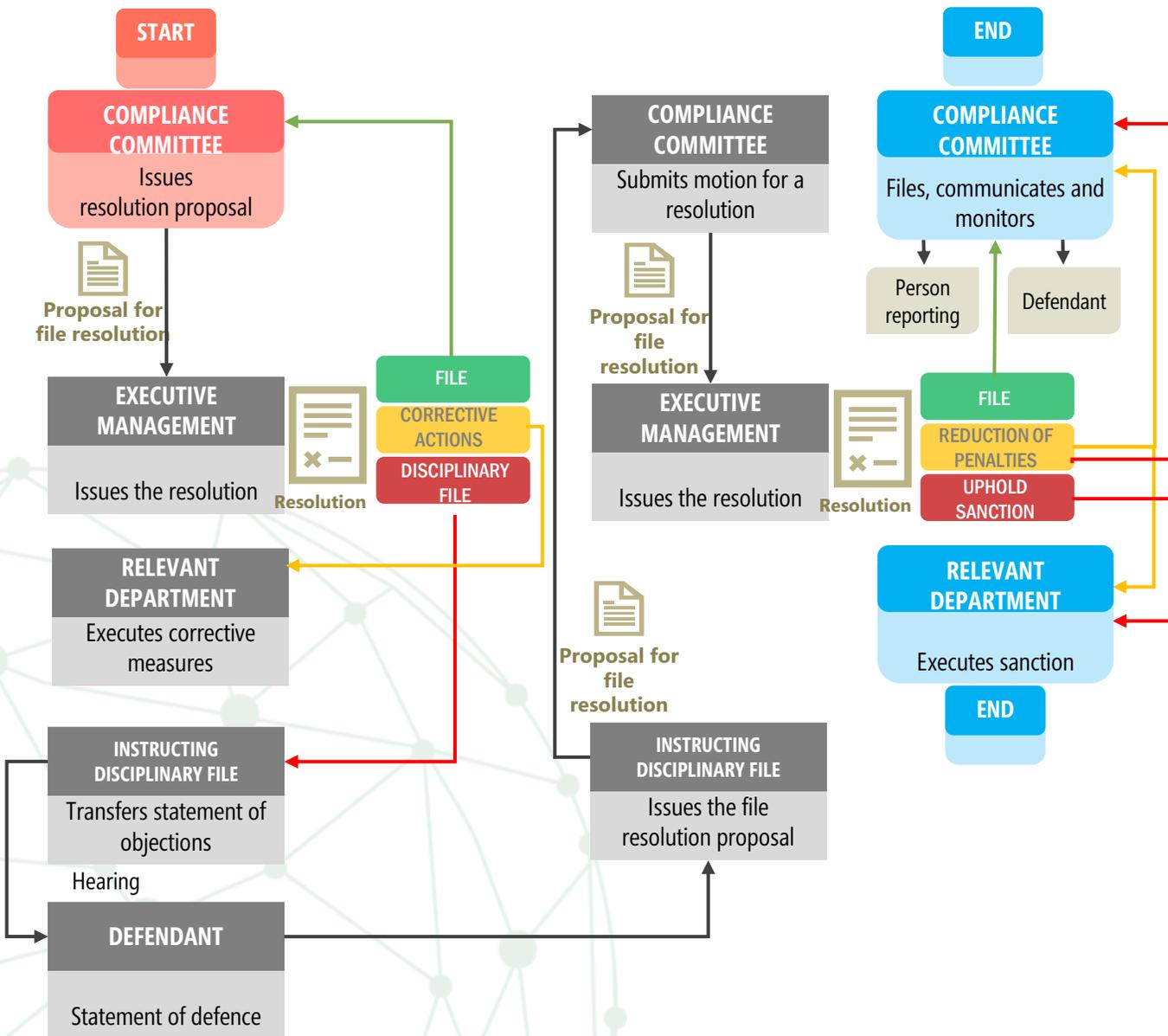


The Compliance Committee will determine the body/department responsible for conducting the **investigation** (if there is criminal relevance, the Compliance Committee itself will be responsible for the investigation).

The assigned body/department will carry out all relevant and useful investigative actions and measures. Once the investigation is concluded, they carry out a final report. Conclusions:

- No reasonable indications or sufficient evidence of non-compliance.
- Reasonable indications or sufficient evidence of non-compliance.
- Causes of the infringement (system deficiencies) and corresponding recommendations for improvement.

This Final Report will be reported to the Compliance Committee, who will forward it to the External Legal Advisor to **categorise** the facts.



PHASE 4: RESOLUTION

The Compliance Committee will make a proposal to the Executive Management, who will resolve:

- a) **File** the report as there is no reasonable indications or sufficient evidence of non-compliance.
- b) Adopt **improvement and/or corrective measures** given that a system deficiency has been observed.
- c) Start of the **disciplinary file**, given that there is reasonable indications or sufficient evidence of non-compliance that justifies disciplinary action.

The investigating officer will send the statement of objections to the defendant, giving him or her a hearing to enable him or her to put forward arguments and give evidence in his or her defence.

If the decision is made to impose a sanction, P&C or the competent department will be entrusted with the written communication to the respondent and the enforcement of the sanction.

Thank you