

The Compliance policy defined by the Criminal Compliance Body reflects the will of the organization in relation to achieving its criminal compliance objectives, as well as satisfying the expectations and needs of the interested parties. For this reason, it undertakes to keep the principles of Criminal Compliance integrated into its management and the development of its processes; through audits and certifications in the field of criminal compliance.

The fundamental principles to achieve the objectives are:

- Commitment to comply with the requirements of the hospital and/or that the IbSalut subscribes.
- Ensure compliance with the regulations and legislation applicable to the criminal compliance management system , at all times.
- Identify the activities in which the crimes that must be prevented may be committed.
- **Prohibit the commission of criminal acts.**
- Minimize the organization's exposure to criminal risks.
- Guarantee the achievement of objectives, through the responsibility and involvement of the entire organisation in meeting them, through the commitment of staff and the effective management of available resources.
- Commitment of the organization to comply with the requirements defined here and in the criminal compliance management system.
- Apply the obligation to report suspicious facts or conduct related to criminal risks, guaranteeing confidentiality and that the informant will not suffer harmful conduct, including retaliation, providing the possibility of anonymity.
- Guaranteeing the authority of the Criminal and Regulatory Compliance Body (OCPN), through a collegiate body of several members, independent of the governing body, providing the OCPN with autonomous powers of initiative and control, are the responsibility for: developing and supervising the operation and observance of the criminal compliance management system.
- Maintain continuous improvement.
- Continuous training is a basic pillar of the organization, for the development of its workers, providing quality theoretical and practical training for them.
- To constitute the Ethical Channel as an internal information system, as a channel for people linked to CHUSE to report any irregularity, as well as any matter or concern related to the risk of committing conduct that may involve an illicit or criminal act. Without prejudice to the possibility of reporting directly to the Independent Authority for the Protection of Whistleblowers, or to any other competent authorities, including the Public Prosecutor's Office.
- Establish as general principles of the Internal Information System:
 - Ensure that the complainant can comply with his or her obligation to report with absolute freedom and without the slightest fear of reprisals, provided that he or she has acted in good faith. Any sanction, disciplinary measure or retaliation for the mere fact of having made a complaint is strictly prohibited.

- Prohibit any person or body of CHUSE from retaliating, or permitting any other person to retaliate or attempt to retaliate, directly or indirectly against good faith whistleblowers. This prohibition includes threats of retaliation and attempted retaliation.
- It guarantees respect for the rights of the person denounced and especially for their right to honour and the presumption of innocence.
- Ensure that the complaint is addressed directly to the OCPN, without the complainant having to communicate their complaint in advance to the hierarchically superior or any other intermediate bodies.
- The complainant will not be obliged to identify himself, since the formulation of anonymous complaints is allowed.
- Ensure strict respect for the rights of the person being reported, including those of the reporting person, including those provided for in the applicable data protection legislation

Failure to comply with the requirements of the aforementioned policy, as well as the requirements derived from the criminal compliance management system, will result in the adoption of the sanctioning measures set out in the **Disciplinary Regime**, as well as other legal actions that the OCPN and the Governing Body deem appropriate.

This Compliance policy is understood, implemented and kept up to date at all levels of the organization, and has the full commitment and support of the OCPN and the Management, who establishes, develops and applies it through the implemented Compliance management system.

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