

## 9. INFORMATION CLIENTS/CONSUMERS.

### 9.1. HEALTH AND SAFETY OF CONSUMERS.

**GRI 416-2: Incidents of non-compliance concerning the health and safety impacts of products and services.**

**GRI 418-I Substantiated complaints concerning breaches of customer privacy and losses of customer data.**

Another of the aspects that affect the RC Celta Group stakeholders, is that related to the health and safety of the users (customers) of the services provided by the Group. That is, both the people who go to the stadiums and those who participate in the activities of Fundación Celta de Vigo and the business of Afouteza e Corazón, S.L.U. With regard to these users, a series of risks that affect their health and safety have been identified:

#### PERSONAL DATA PROTECTION.

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The protection of the personal data of all stakeholders that interact with the RC Celta Group (season ticket holders, fans, customers/users of the Entity's facilities and services, etc.) is governed by the General Data Protection Regulation (Regulation EU 2016/679) and the Spanish Personal Data Protection Act (*Ley Orgánica 3/2018, de Protección de Datos Personales y garantía de los derechos digitales*); we are in the process of adapting to the requirements established by both pieces of legislation.

In this regard, we have set up and announced a data protection channel ([lopd@rccelta.es](mailto:lopd@rccelta.es)) for the entire Group to which any kind of incident related to data protection can be sent.

Likewise, and on the website of the RC Celta Group ([www.RC Celta.es](http://www.RC Celta.es)), in addition to this channel, the "Privacy Policy" is published explaining the personal data processing carried out by the Group, according to the principles of information and transparency it has assumed.

The Group has proactively adopted a series of elements for managing any negative incident or externality that could breach or otherwise affect our data protection system, preparing a specific protocol on how to act in the event of a security breach, in line with the requirements of Art. 33 of the GDPR, which implements the mechanisms necessary to ensure identification, security breaches and notification to the Supervisory Authority (the Spanish Data Protection Agency or AEPD), as well as obtaining ongoing external legal advice on data protection, to complement the Group's internal resources.

All information requests or queries received from users via [lopd@rcelta.es](mailto:lopd@rcelta.es) during the 2021/2022 and 2020/2021 seasons were responded to and handled properly, as none of them were relevant or implied a security violation or breach that affected personal data and that had to be notified to the Supervisory Authority (AEPD).

## PREVENTION OF CRIMINAL OFFENCES.

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As is mentioned in point 6.1 of this report, the Group has introduced monitoring systems in order to prevent the commission of the offences categorised in the Criminal Code, among which it is worth highlighting the existence of a whistleblowing channel ([canaldenuncias@rcelta.es](mailto:canaldenuncias@rcelta.es)) and a protocol for processing any matters raised. Through this channel, members, fans, employees and third parties can inform of those indications or suspicions of the commission of an offence or of the violation of any of the principles and values recognised in the Code of Ethics and the Group's policies. This information, together with the code of ethics and internal policies is provided to anyone joining the Group and is included in the annual Criminal Compliance training carried out by the RC Celta Group and is available on the corporate website.

During the 2021/2022 and 2020/2021 seasons, no communications or reports were received via this Channel.

On this point, it is worth indicating that in the 2019/2020 season the Compliance Management System was implemented and audited under the UNE 19601:2017 standard. At 30 June 2022 the corresponding review of the management system was carried out following an external audit and no non-conformities were detected.

## PROTOCOL FOR THE PREVENTION AND ERADICATION OF HARASSMENT.

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As mentioned in point 6.1 of this report, the Group has a harassment mailbox, managed by the Harassment Prevention Committee, through which all the members of the Group can report cases of harassment. The existence of the same is explained in the annual Criminal Compliance training.

The mailbox is [denunciaacoso@rcelta.es](mailto:denunciaacoso@rcelta.es) and no reports were received in the course of the 2020/2021 season.

In the 2021/2022 season a possible case of harassment was received via the mailbox and after following the approved procedure, it was decided to conclude the same and send final conclusions to the Management of the Company.

## GENERAL INCIDENTS.

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Since November 2017 the RC Celta Group has placed the “Escoitamos” channel (<https://escoitamos.rcelta.es/>) at the disposal of season ticket holders, fans and the general public.

It is a web platform which channels all queries, suggestions, claims and complaints of the companies in the RC Celta Group. In this regard, the Group undertakes to respond to all requests within a maximum term of 3 business days. This period was increased to 5 days, on an exceptional basis, during the season ticket campaign, due to the high number of enquires received. Since its launch, people have used “Escoitamos” 22,307 times.

During the 2021/2022 season the figure for “Escoitamos” was 6,886, the topics involved being:

<b>"ESCOITAMOS" TOPICS</b>	<b>Times used 2020/2021S</b>	<b>% Escoitamos 2021/2022S</b>	<b>Times used 2020/2021S</b>
Season tickets	2,867	41.6%	3,638
Other tickets	1,528	22.2%	168
Facilities	111	1.6%	36
RC Celta stores	448	6.5%	459
A Sede Sports Clinic	9	0.1%	12
Environmental suggestions	6	0.1%	4
Other enquiries	1,917	27.9%	1,344
<b>Total times used</b>	<b>6,886</b>		<b>5,661</b>

At present we have not implemented a system that managed responses to the enquiries submitted in centralised form. Interaction with the fan/season ticket holder is via email, meaning that there is no system for charting the responses. However, we can verify the number of emails sent from the email account that manages the responses exclusively (escoitamos@rcelta.es). During the season, a total of 8,337 emails were sent, showing the degree of compliance with the commitment to respond within three business days.

The high number of “Escoitamos” messages received in the course of the season is due to:

- The degree of effectiveness of the service, being increasingly well-known among Celta fans, which encourages its use to the detriment of other channels that do not guarantee a response, such as the telephone, email or visiting the facilities,
- Digitalisation of the process for handling season tickets, opting to market them via the online store, generating a significant number of enquiries regarding the renewal procedure.
- Following the end of the restrictions derived from the pandemic, fans were once again offered the possibility to buy tickets to enter the stadium. As a result, there has been a substantial increase in doubts and queries on the purchase of tickets for different matches. Moreover, this season historical season ticket holders have been reminded of the option to acquire a certain number of tickets for each match.

## VIOLENCE IN SPORT

Among the values of RC Celta is that of guaranteeing the safety of all users or visitors to our facilities, and overseeing compliance with the legislation designed to eradicate violence in sport. This includes Act 19/2007, of 11 July, on violence, racism, xenophobia and intolerance in sport and Royal Decree 203/2010, of 26 February, which approved the Regulations on the prevention of violence, racism, xenophobia and intolerance in sport.

Specifically, article 6 of Royal Decree 203/2010, of 26 February, regulates the internal regulations of sports venues. The Internal Regulations of Real Club Celta de Vigo S.A.D., in force since 1 August 2010, establishes a series of measures designed to establish:

- a) The obligations to be fulfilled by anyone accessing or intending to access the sports facilities during the holding of sports events or acts directly organised or managed by Real Club Celta de Vigo S.A.D., in order to guarantee public safety and order at the facilities of the Club. These obligations will apply to anyone accessing or intending to access the facilities.
- b) The internal disciplinary regime and procedure applicable to members or season ticket holders of Real Club Celta de Vigo S.A.D., regarding the infringements listed in these Regulations.
- c) The regulation of the different measures designed to promote and support the activities carried out by persons or groups of followers of Real Club Celta de Vigo S.A.D. as well as the rules and conditions for access to the same and their elimination or cancellation.

During the 2021/2022 season, of the 19 first-team games held at Abanca Balaídos, noteworthy incidents only arose in three of the same, being resolved without further ado, where the police filed a total of 2 reports pursuant to Organic Law 4/105 and 13 related to incidents at sports events, one of which led to expulsion from the stadium. (In the 2020/2021 season only 8 Celta B games and 1 first-team game were held with the presence of fans due to COVID -19, with no incidents being recorded)

It should also be noted that none of those 19 matches involved incidents either inside or in the immediate environs of the stadium. At the same time, none of them involved racist or xenophobic insults or chants. On this point, we should highlight that all security mechanisms were implemented and applied correctly, initiating hours prior to the start of each match and ending hours after the conclusion of the same.

The action taken by the RC Celta Group in its commitment to ensuring compliance with the legislation designed to eradicate violence in sport and ensure respect for all those present in the stadium, has involved awareness-raising measures including the installation of posters at all access points to the stands, as well as in the toilets, canteens and other transit areas, calling on all spectators to act properly in terms of their acts and chants, in order to avoid cases of violence, racism, xenophobia and intolerance in sport. Likewise, that information has been shared on social media and on the scoreboard and the public address system before and during games (including at halftime) in order to ensure the message is spread as far as possible.



## SAFETY AT THE FACILITIES.

With a view to guaranteeing the safety of all users or visitors to our facilities, the RC Celta Group has internal protocols on how to act in the face of any acts or conduct that could affect safety at the facilities, potentially causing a risk for all persons present.

In the 2019/2020 season, the RC Celta Group received the AENOR certificate on protocols for action regarding COVID-19, a recognition that highlights the measures and protocols adopted by the Group, collaborating in the process of the return to normality, with day-to-day monitoring of the healthcare situation and enhancing the business continuity processes. RC Celta is the first club in Spain to obtain this certificate.

In this way, AENOR supports best practice in the management of the risks derived from COVID-19 in all the facilities and companies belonging to the RC Celta Group (Real Club Celta de Vigo, S.A.D., Afouteza e Corazón, S.L.U. and Fundación Celta de Vigo).

A renewal audit was carried out in June 2022 without finding any non-conformities and making just 2 observations to be taken into account for the next review in December 2022.

All the facilities and services of the RC Celta Group have the certainty that they are applying appropriate protocols and, moreover, show their commitment to stopping the spread of COVID-19. Specifically, the A Sede Building, that houses the Silabario Restaurant, A Sede-Trigal Café, RC Celta Clinic, official RC Celta store, A Canteira residence and offices of the Group becomes a space that complies with the COVID certificates and has placed special emphasis on the sanitation of all its areas, cleaning all common areas. Moreover, we have also increased the number of gel dispensers and established measures to ensure people maintain a safe distance and restrict movement between the different floors of the building promoting the use of technology and avoiding contact with and access by suppliers. All work centres have disinfectant mats, awareness posters and prevention information. The RC Celta Group provides all employees with masks and the material necessary to do their work with maximum protection.

The RC Celta Group carried out lateral flow tests on all its employees in the 2020/2021 season. During the 2021/2022 season first-team players were tested daily. The other teams had periodic tests and the rest of staff underwent voluntary testing when several cases arose.

On 5, 6 and 8 July 2022 the audit on safety management and the management, conservation and maintenance of sports facilities and the offices was carried out by AENOR. It indicates that the RC Celta Group complies with the requirements of the Standard and the other audit criteria in general terms (legal and regulatory requirements, client requirements, requirements of the internal management system itself). Moreover, recommendations are provided, such as differentiating between the environmental aspects that arise under normal conditions and those arising under abnormal conditions, so that the RC Celta Group can achieve the optimum degree of efficiency by continuous improvement.

Meanwhile, the RC Celta Group is committed to transparency, which can be seen by the 100% score obtained in the last edition of INFUT (Football Club Transparency Index) (from 2019). INFUT assesses 48 Indicators, belonging to five areas of transparency. The area corresponding to “Relations with members, fans and the general public”, in relation to the safety of the facilities, finds that the RC Celta Group complies with the following points:

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The Club’s specific rules and recommendations for fans regarding behaviour and combatting violence are published in its facilities and venues, as well as in the events in which the Club takes part at other venues.

24

Information is provided on prohibited symbols and materials (flares, weapons, laser pointers, etc.) inside the Club’s sports facilities.

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The Club's Internal Regulations and/or at least the measures adopted or envisaged in relation to potentially violent or radical groups that attend the sports facilities are published.

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Information on police and private security presence at sporting events.

Moreover, in order to guarantee safety at the facilities of the RC Celta Group, the following measures are adopted:

- In relation to access controls, the RC Celta Group has the support of the security support personnel who supervise each of the access gates through which fans enter the venue. Depending on the gate and the profile of the person entering, the access control is of one kind or another.
- Access to Boxes is according to a list of Authorities drawn up and checked in advance by the RC Celta Group Protocol Officer.
- Access for Media personnel is according to a Press list, requiring presentation of National ID cards and passes prepared and checked in advance by the RC Celta Group Security Department.
- Access for Service personnel not belonging to the RC Celta Group (canteens, hostesses, maintenance services, etc) is according to a list, requiring presentation of National ID cards and passes prepared and checked in advance by the RC Celta Group Security Department.
- Access for spectators and season ticket holders is by scanners in the access turnstiles, tickets in paper or QR format, or numbered season tickets in PVC format, respectively.

Meanwhile, monitoring of incidents is in accordance with a Service report prepared after the end of the event by the Private Security hired by the RC Celta Group, and verified by our own Security Department.

The Abanca Balaídos Stadium has 31 exits (taking into account works).