

WHISTLEBLOWER POLICY

1. Whistleblower Policy:

The Promarinha Whistleblower policy aims to allow workers and other professionals to submit reports anonymously and guarantee confidentiality throughout the entire process. It is based on Law 93/2021 of December 20th, which came into force on June 18th, 2022. The identity of the complainant can only be disclosed as result of legal obligation or court decision.

It assumes an essentially preventive nature. It is an instrument of self-regulation and self-control that will allow, in the face of known facts and reported in good faith, to act and correct any illegal actions or prevent their future occurrence, ensuring compliance with the law, regulations and procedures in force, in the case of an action exclusively oriented towards the pursuit of the public interest.

Some examples of types of violations for which the whistleblower channel is intended:

Any act or omission that is contrary to regulations contained in national or community legislation relating to the areas of,

- Public procurement;
- Financial services, products and markets and prevention of money laundering and terrorist financing;
- Product safety and compliance;
- Transport security;
- Environmental protection;
- Radiation protection and nuclear safety;
- Food safety for human and animal consumption, animal health and animal welfare;
- Public health;
- Consumer defence;
- Protection of privacy, personal data and security of network and information systems.

This Whistleblower Policy aims to ensure that reports of violations of the law are received in accordance with applicable legal provisions and are processed, stored and archived with the necessary confidentiality.

2. Whistleblower and covered entities:

This policy applies to natural persons who report an infringement based on information obtained in course of their professional activity, regardless of the nature of this activity and the sector in which it is carried out.

Who can report?

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Any person who comes across information relating to infractions that they have obtained during their professional activity, including:

- workers;
- service providers, contractors, subcontractors and suppliers (or any persons under their supervision);
- holders of social shares and members of statutory bodies;
- volunteers and interns and;
- former workers and job seekers.

3. Entry into force:

This policy comes into effect from January 2, 2024.

4. Terms of the report:

4.1. Opportunity to report:

This policy ensures the right of whistleblowers to submit a complaint anonymously, in accordance with legal requirements and limits and does not establish an obligation to report.

4.2. Non-retaliation:

Complainants will not be subject to harassment, retaliation, or any type of adverse employment consequence, such as dismissal, downgrade, contract suspension, or discrimination, as result of submitting the complaint.

Anyone who violates the provisions of the previous paragraph regarding whistleblowers in good faith will be subject to disciplinary proceedings, which could lead to their dismissal.

4.3. How to submit the complaint:

Submission of complaints must be made in writing, if you wish to make a complaint under the RPGDI, you must use the following Whistleblower Complaint Form:

<https://www.promarinha.pt/en/denuncia>.

The internal whistleblower policy allows the submission of complaints, in writing and/or verbally, by employees, anonymously or with the complainant's identification.

If a verbal complaint is admissible, the internal reporting channels allow it to be presented by telephone, at the request of the complainant, in a face-to-face meeting.

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4.4. Admissibility of the complaint:

The whistleblower policy is available exclusively for the reception and processing of complaints arising from violations of the law, namely issues related to corruption, competition rules, fraud, financial crime, food quality and safety, harassment and discrimination, protection of personal data, rights and protection of individuals, serious environmental damage, or conflict of interest situations.

The complainant should only submit the complaint when he is convinced of the veracity of the alleged facts. In case of doubt, it should be highlighted, and the facts presented as suspicion. If reports are made with knowledge of the falsity of the facts alleged by the complainant, he or she may be held legally responsible.

4.5. Whistleblower Protection:

All reports, even if they contain references to the complainant, will be processed and treated confidentially, in accordance with applicable legislation.

5. Confidentiality and data protection:

Any complaint, regardless of its veracity, is likely to harm the reputation of the people involved, the complainants and/or third parties, as well as the companies. In this sense, confidential treatment is guaranteed, and in accordance with the obligations arising from legislation relating to the processing of personal data.

6. Deletion of data: The deletion of data in the whistleblower policy will be carried out exclusively in accordance with legal provisions and this policy, always subject to the approval of at least two administrators of the whistleblower policy.