



 STRICKER

Regulation of the Internal Reporting Channel

Table of Contents

| | |
|---|---|
| Introduction | 4 |
| Article 1 (Infractions) | 4 |
| Article 2 (Whistleblower) | 5 |
| Article 3 (Reporting Channel) | 5 |
| Article 4 (Reports – Form and Object) | 6 |
| Article 5 (Procedure and Commitment in the Rigorous Consideration of the Report) | 6 |
| Article 6 (Confidentiality and Data Protection) | 7 |
| Article 7 (Independence and Autonomy when Receiving and Treating Reports) | 8 |
| Article 8 (Guarantee of Protection of the Whistleblower who acts in Good Faith) | 8 |
| Article 9 (Rights of the Infraction Suspect) | 9 |



Introduction

Law No. 93/2021, 20 December, established the general regime for the protection of infractions whistleblowers, transposing Directive (EU) 2019/1937 of the European Parliament and the Council, of 23 October 2019, into the national legal system, regarding the protection of persons who report violations of European Union law.

Illicit activities and legal infractions that may occur within organizations, if not opposed, can seriously harm the public interest.

Workers and, in general, people who have a professional or commercial relationship with organizations are usually those who have first-hand knowledge of the practice of acts that may constitute the occurrence of legal infractions. For this reason, such people are in a privileged position to report such events to the competent authorities, so that they can resolve them, or at least contribute to their resolution.

On the other hand, it is necessary to ensure the protection of whistleblowers to prevent cases of retaliation, discrimination or other serious consequences that may arise as a result of the condition of whistleblower. Only a system that provides adequate protection and guarantees to whistleblowers, promoting encouragement and preventing deterrence, can work. The protection of whistleblowers is thus essential not only to guarantee their protection, but also social well-being and safeguard the public interest.

Legal persons, including the State and other legal persons governed by public law, that employ 50 or more workers, and entities that are included in the scope of application of the European Union acts referred to in part I.B and II of the Directive (EU) 2019/1937 annex of the European Parliament and of the Council, are required to have internal reporting channels.

Stricker is a responsible organization that is governed by high levels of ethics and integrity, understanding that this issue is nowadays crucial to its success and reputation.

For this reason, Stricker has approved a Code of Conduct and this Regulation of the Internal Report Channel, to encourage those who, in good faith, suspect the practice of illegal conduct within the organization, can, through a report hotline, communicate the concerned facts, in a safe way and without suffering retaliation, which will be governed by the following articles:

Article 1 (Infractions)

1. For the purposes of this Regulation, acts or omissions contrary to the rules contained in the European Union acts, or to national rules referring to the legal areas provided for in the Code of Conduct, are infractions.

2. In addition to the subject mentioned in the Code of Conduct, reports may be made on the following topics:

- a. Public procurement;
- b. Financial services, products and markets and prevention of money laundering and terrorist financing;
- c. Prevention of corruption;
- d. Product safety and compliance;

- e. Transport security;
- f. Environmental protection;
- g. Radiation protection and nuclear safety;
- h. Food and animal safety, health and welfare;
- i. Public health;
- j. Consumer defense;
- k. Privacy and personal data protection and security of network and information systems.

3. Reflecting Stricker's culture of responsibility and good corporate practices and in compliance with the applicable legislative framework, Stricker implemented the appropriate means, established the rules, and defined the applicable procedures to receive, handle and file any complaints that may be made.

4. Reports submitted that exceed the scope of the areas covered by numbers 1 and 2 above cannot be analysed.

Article 2 (Whistleblower)

The report of infractions may be made by workers, service providers, contractors, subcontractors, suppliers, holders of shareholdings, persons belonging to administrative or management bodies or to tax or supervisory bodies of legal persons, including Stricker non-executive, volunteer, or intern staff.

Article 3 (Reporting Channel)

1. The Reporting Channel will be operated internally by the ombudsman of the code of conduct, an entity that guarantees independence, impartiality, confidentiality, data protection, secrecy, and the absence of conflicts of interest in the performance of its duties.

2. The Reporting Channel accepts written reports.

3. Reports must be submitted through the WhistleB/Navex platform, available through the Stricker website, under the address WhistleB, Whistleblowing Centre.

Article 4 (Reports – Form and Object)

1. The report may have as its object infractions that occurred, which are being performed or can reasonably be foreseen, as well as attempts to conceal the infractions.
2. The report of an infraction may be based on information obtained after the termination of the professional relationship, or during the recruitment process or other pre-contractual negotiation phase, even if this is not constituted.
3. The reports communication is optional, and there will be no consequences if the persons referred to in article 2 above do not carry out the reports.
4. Persons who, due to the roles performed at Stricker, namely in the internal areas of Audit and Compliance, become aware of an act that may constitute an infraction under the terms of article 1 above, have the duty to communicate them in the Stricker's Reporting Channel.
5. The report of infractions may contain the identification of the whistleblower or be anonymous.
6. For the investigation to be as quick and effective as possible, the reports must contain as many elements as possible to characterize the infraction.

Article 5 (Procedure and Commitment in the Rigorous Consideration of the Report)

1. Stricker notifies the whistleblower within seven days of confirmation of receipt of the report, also informing him, in a clear and accessible way, about the requirements, the competent authorities, the form and admissibility of making an external report.
2. Stricker analyses all reports received, whose competence is exclusive to the Human Resources, Legal and Sustainability departments depending on the report's subject, although they can be assisted by the remaining internal areas of Stricker.
3. Following the report, Stricker takes the appropriate internal measures to verify the allegations contained therein and, where applicable, to stop the alleged infraction, and may even open an internal investigation, or communicate to the competent authorities to investigate the infraction, including the institutions, bodies, or agencies of the European Union.
4. Stricker registers all reports, assigning each one a sequential number, indicating the respective date of receipt, analysis and issuance of the respective report and classifying it as pending or closed.
5. Stricker prepares a reasoned report for each report received, which must contain a decision to take corrective action or, alternatively, a decision to close it together with a justification for not taking any action.
6. Stricker will inform the whistleblower regarding the measures planned or adopted to follow up on his report, together with the respective grounds, within a maximum period of three months from the date of receipt of the report, or six months when the complexity of the report justifies it.
7. The whistleblower may request, at any time, that Stricker communicate the result of the analysis carried out on the report within fifteen days after the respective conclusion.

8. Reports and documentation prepared following the respective analysis will be filed in a non-editable electronic format that ensures the full and unaltered reproduction of the information contained therein, for a period of 5 years and, regardless of this period, during the pendency of disciplinary proceedings, judicial or administrative matters relating to the report. The personal data subject to the report are destroyed immediately if they prove to be inaccurate or useless. In case of disciplinary or judicial proceedings, the data are kept until the end of that procedure. In this case, they are kept in an information system with restricted access and for a period that does not exceed the legal procedure.

9. Stricker annually prepares a document with a summary of the reports received and their respective processing

Article 6 (Confidentiality and Data Protection)

1. Stricker has instituted general safeguard procedures in relation to the entire process of reception, registration, appraisal and decision, so that the guarantees of completeness, integrity and preservation of the report and the confidentiality of the identity or anonymity of the whistleblower and the confidentiality of third parties mentioned in the report, the protection of the personal data of the whistleblower and of the suspect of the infraction in the applicable legal and regulatory terms, of exemption and priority in the treatment, are permanently ensured, as well as to prevent the access of unauthorized personnel.

2. The identity of the whistleblower, as well as the information that, directly or indirectly, makes it possible to deduce his identity, are confidential and are of restricted access to the persons responsible for receiving or following up on the reports.

3. The obligation of confidentiality referred to in the previous number extends to those who have received information about reports, even if they are not responsible or incompetent for their reception and treatment.

4. The identity of the whistleblower is only disclosed because of legal obligation or court decision.

5. The disclosure of information is preceded by a written communication to the whistleblower indicating the reasons for disclosing the confidential data in question unless the information provision compromises investigations or related legal proceedings.

6. Stricker has taken the necessary precautions to preserve the security of personal data whose processing will be carried out during the entire procedure, adopting the measures provided for in Law 93/2021 of December 20 and in Deliberation 765/2009 of the National Commission of Data Protection (CNPD) on the Principles Applicable to the Processing of Personal Data for the purpose of Internal Communication of Irregular Financial Management Acts (Ethics Lines), or other Resolutions that may be issued by the CNPD on these matters. Security measures apply both to data contained in automated files and to manual data.

7. Under the terms of the Personal Data Protection Law (Law 58/19 of 8 August) the data subjects linked to the reports are guaranteed the rights of access and correction in relation to their data.

8. Stricker will immediately delete personal data that are clearly not relevant to the handling of the report.

9. The provisions of the previous number do not prejudice the duty to preserve verbally presented reports, when this conservation is done by recording the communication in a durable and retrievable medium.

10. This reporting channel was the subject of an impact assessment having achieved a positive opinion from the EPD.

Article 7 (Independence and Autonomy when Receiving and Treating Reports)

1. Stricker is committed to guaranteeing independence and autonomy in the process of receiving and handling all infraction reports, namely, by excluding from the analysis process all current or potential stakeholders who have, or may have, any conflicts of interest relating to the process in question, resulting from intervention in the alleged infraction, family relationships, property interests, or any other cause related to the alleged infraction or to the whistleblower.
2. The conflicts of interest resolution will always respect the determinations of Stricker's code of conduct, the applicable legal and regulatory provisions.

Article 8 (Guarantee of Protection of the Whistleblower who acts in Good Faith)

1. The whistleblower benefits from the protection afforded by law who, in good faith, and having grounds to believe that the information is, at the time of the report or public disclosure, true, publicly reports or discloses an infraction.
2. When the whistleblower has expressly demonstrated the will for secrecy regarding his identity, this will remain restricted to the ombudsman of the code of conduct. Regarding the processing, with a view to an internal investigation process, it will be ensured that the documents sent do not contain elements relating to the sender's identification.
3. Stricker is directly responsible for protecting the whistleblower against any retaliation or reprisal following the report. However, the duty of protection cannot be extended to the participation of the whistleblower when concluding infractions related with the report, if it proves to have acted in bad faith or with falsehood when reporting an alleged infraction that he knew to be unfounded, or in the case of workers, when possible disciplinary measures arise from violation of professional duties without any relation to the report.
4. Yet for the reports made under these Regulations and the applicable legal provisions, these cannot, by themselves, serve as a basis for Stricker to initiate any disciplinary, civil, or criminal proceedings against the whistleblower, unless they are deliberately unfounded.

Article 9 (Rights of the Infraction Suspect)

1. Under the terms of the Personal Data Protection Law (Law 58/19 of August 8), the suspect of the infraction is assured the information rights identifying Stricker as responsible for the processing of personal data inherent to the report, the referred facts, and the purpose of the treatment as well as the right to access the data concerning the suspect and the right to request its rectification or deletion if they are inaccurate, incomplete or equivocal.
2. The suspect of infraction cannot, however, obtain information from Stricker about the identity of the whistleblower.

3. Under the general terms of law, the suspect has the right to defend his name and privacy and, as well as the right to lodge a claim for the crime of slanderous denunciation, if there are grounds for doing so.

Privacy Information

(provided under the terms of the article 13 of the GDPR (General Regulation on Data Protection))

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| Responsible for Treatment | Stricker |
| Data Protection Officer | Departamento jurídico da Paul Stricker, SA. |
| Data collected | Personal data relating to the holders identified below. Identification, contact and other data related to the reports content. |
| Types of Holders | Whistleblowers, denounced, third parties who can be identified in the reports. |
| Purpose | Management and processing of the report of infractions submitted through the Infraction Reporting Channel. |
| Basis | Compliance with legal obligations and legitimate interest. |
| Data Retention Term | Reports will be kept for a minimum period of five years and, regardless of this period, during the pendency of judicial or administrative proceedings relating to the report. The abovementioned is without prejudice to the archival conservation rules of the judicial courts and administrative and tax courts. |
| Data Transmission | Authorities competent to investigate infringements, namely: Public Ministry, criminal police bodies, Portuguese Central Bank, independent administrative authorities, public institutes, general inspec-torates and similar entities and other central services of the direct administration of the State endowed with administrative autonomy, local authorities, and public associations. Institutions, bodies, or organizations of the European Union. |

Rights of Personal Data Subjects

Under the Personal Data Protection Law, the right of access, updating, rectification, elimination, portability, limitation and erasure of personal data is guaranteed. As well as the right to file complaints before the National Data Protection Commission (CNPD). These rights performing must be carried out through the following email; dpo@stricker.pt or by mail to "Núcleo Industrial de Murtede", Lot 5, 3060-372 Murtede,



