



**REGULATION OF THE  
INTERNAL REPORTING  
CHANNEL**

# Index

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

# Introduction

Law No. 93/2021, December 20, established the general regime for the protection of whistleblowers, transposing Directive (EU) 2019/1937 of the European Parliament and the Council of October 23, 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.

Employees and, in general, people who have a professional or commercial relationship with organizations are usually those who have first-hand knowledge of acts that may constitute legal infractions. For this reason, they are in a privileged position to report such occurrences 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 for social well-being and to safeguard the public interest.

Legal entities, including the State and other legal entities governed by public law, that employ 50 or more employees, 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 governed by high ethical and integrity standards, understanding that this issue is nowadays crucial to its success and reputation.

For this reason, Stricker has approved a Code of Conduct and the present Regulation of the Internal Reporting Channel, to encourage those who, in good faith, suspect the practice of illegal conduct within the organization to report the facts at issue through a reporting line, in a secure manner and without suffering retaliation, which will be governed by the following articles:

## Article 1 (Infractions)

1. For the purposes of this Regulation, infractions shall be deemed to be 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.

2. In addition to the subjects 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 protection;
- 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 has implemented appropriate means, established rules, and defined the applicable procedures to receive, handle and file any complaints that may be submitted.

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

## Article 2 (Whistleblower)

Reports of infractions may be made by employees, service providers, contractors, subcontractors, suppliers, shareholders, members of management or administrative bodies, or fiscal or supervisory bodies of legal entities, including non-executive members, volunteers, or interns of Stricker.

## 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 on 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 have been committed, are being committed 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 it 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. Individuals who, due to their functions 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 it through Stricker's Reporting Channel.

5. The report of infractions may include the identification of the whistleblower or be anonymous.

6. In order for the investigation to be as quick and effective as possible, the reports must contain as many elements as possible to characterise the infraction.

## Article 5 (Procedure and Commitment to Rigorous Assessment of Reports)

1. Stricker notifies the whistleblower within seven days of confirming receipt of the report, also providing clear and accessible information on the requirements, competent authorities, form and admissibility of making an external report.
2. Stricker analyses all reports received, whose competence is exclusive to the People, 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, if necessary, to cease the alleged infraction, and may even open an internal investigation, or notify the competent authorities to investigate the infraction, including the institutions, bodies, or agencies of the European Union.
4. Stricker registers all reports, assigning each a sequential order 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 dismiss along with a justification for not taking any action.
6. Stricker will inform the whistleblower regarding the measures planned or adopted to follow up on their report, along 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 archived 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, judicial, or administrative proceedings relating to the report. The personal data subject to the report are destroyed immediately if found 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 within a restricted access information system for a period not exceeding the judicial procedure.
9. Stricker prepares an annual report summarizing the reports received and their respective processing.

## Article 6 (Confidentiality and Data Protection)

1. Stricker has instituted general safeguard procedures regarding the entire process of receiving, registering, assessing, and deciding upon reports, ensuring that guarantees of thoroughness, integrity, and preservation of the report, as well as the confidentiality of the identity or anonymity of the whistleblowers, and the confidentiality of third parties mentioned in the report, the protection of personal data of the whistleblower and the suspect of the infraction in accordance with applicable legal and regulatory terms, exemption, and priority in treatment, are permanently ensured, as well as preventing unauthorized access.
2. The identity of the whistleblower, as well as the information that, directly or indirectly, makes it possible to deduce their identity, is confidential and restricted to those responsible for receiving or following up on the reports.

3. The confidentiality obligation 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 as a result of a legal obligation or a court decision.
5. The disclosure of information is preceded by a written communication to the whistleblower indicating the reasons for the disclosure of the confidential data in question, unless the information provision compromises related investigations or legal proceedings.
6. Stricker has taken the necessary precautions to preserve the security of personal data whose processing will be carried out throughout the procedure, adopting the measures provided for in Law 93/2021 of December 20 and in Deliberation 765/2009 of the National Commission for Data Protection (NCDP) 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 Deliberations that may be issued by the NCDP 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 August 8) the data subjects linked to the reports are guaranteed the rights of access and rectification in relation to their data.
8. Stricker will immediately delete personal data that is 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 on a durable and retrievable medium.
10. The present Reporting Channel was the subject of an impact assessment and received 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 related 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, as well as applicable legal and regulatory provisions.

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

1. The whistleblower who, in good faith and with serious grounds to believe that the information is true at the time of reporting or public disclosure, reports or publicly discloses an infraction, benefits from the protection provided by law.
2. When the whistleblower has expressly demonstrated the will for confidentiality regarding their identity, this will remain restricted to the ombudsman of the Code of Conduct. Regarding the processing, considering an internal investigation procedure, 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 extend to the whistleblower's involvement in committing the infractions subject to the report, if it is proven that they acted in bad faith or falsely reported an alleged infraction they knew to be unfounded, or in the case of employees, when any disciplinary measures result from violations of professional duties unrelated to the report.

4. Yet for the reports made under these Regulations and the applicable legal provisions, these cannot, on their own, 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 their name and privacy, as well as the right to file a complaint 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 Data Protection Regulation))

Responsible for Treatment	Data Protection Officer (DPO)
Data Protection Officer	Legal Department of Paul Stricker, SA.
Data collected	Personal data relating to the subjects identified below. Identification, contact and other data related to the report's content.
Types of Subjects	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 Period	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 mentioned above does not prejudice the archival conservation rules of the judicial and administrative and fiscal courts.
Data Transmission	Competent authorities for investigating infringements, namely: <ul style="list-style-type: none"> <li>Public Prosecutor's Office, criminal police bodies, Bank of Portugal, independent administrative authorities, public institutes, general inspectorates, and equivalent entities, and other central services of the State administration endowed with administrative autonomy, local authorities, and public associations.</li> <li>Institutions, bodies, or organizations of the European Union.</li> </ul>
Rights of Personal Data Subjects	Under the Personal Data Protection Law, the right to access, update, rectify, delete, portability, limitation and erasure of personal data is guaranteed. As well as the right to lodge complaints with the National Commission for Data Protection (NCDP). The exercise of these rights must be carried out via the following email: dpo@sticker.pt or by mail to be sent to Núcleo Industrial de Murtede, Lote 5, 3060-372 Murtede





[stricker-europe.com](https://stricker-europe.com)

