

**INTERNAL  
REPORTING  
CHANNEL REGULATION**

vectormais

## INTERNAL REPORTING CHANNEL REGULATION

**VECTOR MAIS – PROYECTOS E OBRAS DE INTERIORES, S.A.**, registered at the Commercial Registry Office of Cascais under the single registration and legal person number 504 796 089, with share capital of two hundred thousand euros, hereinafter referred to as "**VECTOR MAIS**".

Given that **VECTOR MAIS** has more than 50 employees, it is obliged to implement and make available an internal reporting channel for reporting infractions in certain domains, under the terms of Law 93/2021, of December 20 (Law 93/2021), which establishes the general regime for the protection of whistleblowers, transposing Directive (EU) 2019/1937 of the European Parliament and Council, of 23 October 2019, on the protection of people who report violations of Union law. This protection extends to natural persons assisting the whistleblower in the reporting procedure (including trade union representatives or employee representatives), to third parties connected with the whistleblower, and to legal persons owned or controlled by the whistleblower, for whom the whistleblower works or with whom the whistleblower is otherwise connected in a professional context.

**VECTOR MAIS** now has its own internal reporting channel in line with the applicable legal requirements, through which employees, service providers, contractors, subcontractors, suppliers, owners of shareholdings and persons belonging to administrative or management bodies or to tax or supervisory bodies of legal persons and trainees are allowed to report infractions in certain areas, with the guarantee of their protection. The matters to be reported are those duly identified in Section 2 of this Regulation.

The mechanisms and procedures for receiving, storing and handling reports covered by this Regulation comply with the personal data protection rules in force, as well as information security rules.

### 1. Whistleblowers

1.1. Whistleblowers may resort to the internal reporting channel. Whistleblowers are understood to be:

- a) **VECTOR MAIS** current or former employees, provided that in the latter case the complaint is based on information obtained during the professional relationship that has ended;
- b) **VECTOR MAIS** service providers, contractors, subcontractors and suppliers (as well as any persons acting under their supervision and direction);
- c) Holders of **VECTOR MAIS** shareholdings and persons belonging to administration or management bodies or to tax or supervisory bodies;
- d) Candidates for employment at **VECTOR MAIS**, and volunteers and interns, paid or unpaid, at **VECTOR MAIS**.

### 2. Scope of Application:

2.1. The report may concern infractions that have already been committed, are being committed or that can reasonably be foreseen (as well as attempts to conceal such infringements):

- a) In the areas described in the following paragraph; and
- b) Provided it is based on information obtained in the course of professional activity, during the recruitment process or during another pre-contractual negotiation phase of an existing or unformed professional relationship.

## 2.2. Complaints can be submitted through the internal reporting channel regarding:

- i. Acts or omissions contrary to community and national rules in the following areas:
  - ✓ Public procurement;
  - ✓ Financial services, products and markets and prevention of money laundering and terrorist financing;
  - ✓ Product safety and compliance;
  - ✓ Transport safety;
  - ✓ Environmental protection;
  - ✓ Radiation protection and nuclear safety;
  - ✓ Food and feed safety, animal health and animal welfare;
  - ✓ Public health;
  - ✓ Consumer Protection;
  - ✓ Privacy and personal data protection, and network and information system security.
- ii. Acts or omissions contrary to and harmful to the financial interests of the European Union (fraudulent activities);
- iii. Acts or omissions contrary to internal market rules, including competition rules and state subsidies, as well as corporate taxation rules;
- iv. Violent, especially violent and highly organized crime, as well as the following crimes:
  - ✓ Drug trafficking;
  - ✓ Terrorism, terrorist organisations, international terrorism and terrorism financing;
  - ✓ Arms trafficking;
  - ✓ Traffic of influence;
  - ✓ Undue receipt of advantages;
  - ✓ Active and passive corruption, including that committed in the public and private sectors and in international trade, as well as in sports;
  - ✓ Embezzlement;
  - ✓ Economic participation in business;
  - ✓ Money laundering;
  - ✓ Criminal association;
  - ✓ Child pornography and solicitation of minors;
  - ✓ Damage relating to computer programs or other data and computer sabotage and even, in some circumstances, illegitimate access to a computer system;
  - ✓ Human trafficking;
  - ✓ Counterfeiting, use and acquisition of counterfeit cards or other payment devices and respective prerequisite acts, acquisition of cards or other payment devices obtained through a computer crime, damage to computer programs or other computer data and computer sabotage and also, in some circumstances, illegitimate access to a computer system;
  - ✓ Procuring;
  - ✓ Smuggling;
  - ✓ Trafficking and tampering of stolen vehicles.

- v. In the fields of national defence and security, only the act or omission contrary to the rules of engagement contained in community legislation listed in part i. A of the Annex to Directive (EU) 2019/1937 of the European Parliament and Council is considered an infraction.
- 2.3. Only whistleblowers who have a serious basis for believing that the information is true at the time of the complaint shall benefit from the protection of this Regulation.
- 2.4. If **VECTOR MAIS** concludes that the report is presented in bad faith and/or is manifestly unfounded and/ or does not correspond to the truth, it will be archived, without prejudice to any other legal or disciplinary consequences that may apply to the case.
- 2.5. The provisions of this Regulation do not prejudice the right of workers to consult their representatives or the rules of protection associated with the exercise of said right.

### 3. Internal Reporting Channel

- 3.1. This Regulation is based on a voluntary whistleblower regime.
- 3.2. The internal reporting channel is operated internally by Human Resources to receive complaints and also operated internally, exclusively, by the Quality Manager, to follow up on reports.
- 3.3. Organizational and operational security measures have been implemented, with a view to presenting and following up on internal reports in a secure manner.
- 3.4. The following is ensured:
  - a) Completeness, integrity and conservation of the reports;
  - b) The confidentiality of the identity or anonymity of the whistleblowers (as applicable), as well as the confidentiality of the identity of third parties mentioned in the report; and
  - c) Prohibition of access to the report by unauthorised persons.

### 4. Filing of an internal report

- 4.1. The internal report must be submitted to **VECTOR MAIS**:
  - a) In writing or verbally;
  - b) By any of the whistleblowers referred to in section 1; and
  - c) Anonymously or with the identification of the whistleblower.
- 4.2. In the case of a verbal report, you can use the telephone line +351 214 129 000 and request a face-to-face meeting for this purpose from the Human Resources department.
- 4.3. Written reports can be submitted at <https://vectorsmais.form.maistransparente.com/>.
- 4.4. In the case of anonymous reporting, if you so wish, you may identify yourself later, and your protection is guaranteed, namely, the confidential treatment of your identification.
- 4.5. If the report is submitted verbally or in a face-to-face meeting, **VECTOR MAIS** will obtain the consent of the whistleblower for registration on a lasting and recoverable medium. If consent is not provided, the report must submit the complaint in writing.

## 5. Follow-up of the internal report

### 5.1. Upon receipt of the report, **VECTOR MAIS**:

- a) Notifies the whistleblower of receipt and provides information on the terms of submission of an external report (to the competent authorities), within seven days from the date of receipt of the internal report by **VECTOR MAIS**;
- b) Performs the internal acts considered appropriate, with the aim of verifying the allegations contained in the report and, where applicable, terminates the reported infraction;
- c) Opens an internal investigation or communicates with the competent authority to investigate the infraction as and if deemed necessary;
- d) Notifies the whistleblower of the measures envisaged or adopted to follow up on the report and the respective grounds, within a maximum period of three months from the date of receipt of the report by **VECTOR MAIS**.

**5.2.** The whistleblower may at any time request that **VECTOR MAIS** communicate the result of the analysis carried out to the whistleblower within 15 (fifteen) days after the conclusion of the respective analysis.

## 6. Confidentiality

**6.1.** The identity and information that may identify the whistleblower are restricted to the persons responsible for receiving and/or following up on the reports.

**6.2.** The identity of the whistleblower is only disclosed in order to comply with a legal obligation or following a court order to that effect. In this case, the whistleblower is notified, in writing, of the reasons for the disclosure of the confidential data in question, unless the provision of this information compromises the related investigations or legal proceedings.

**6.3.** The provisions of the previous paragraphs are also applicable to the identity of:

- a) Natural persons who assist the whistleblower in the whistleblowing procedure and whose assistance must be confidential, including trade union representatives or employee representatives;
- b) Third parties connected to the whistleblower, namely co-workers or family members, and who may be the target of retaliation in a professional context; and
- c) Legal persons or similar entities owned or controlled by the whistleblower, for which the whistleblower works or with which the latter is in some way connected in a professional context.

**6.4.** The persons responsible for receiving and/or monitoring reports, as well as anyone who has received information about reports (even if not competent for this purpose) are bound by obligation of confidentiality.

## 7. Personal Data

- 7.1. **VECTOR MAIS** is the Personal Data Controller, and treats personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 (General Data Protection Regulation - "GDPR") and Law 58/2019 of 8 August.
- 7.2. Without prejudice to anonymity, when you provide **VECTOR MAIS** with your personal data and/or that of third parties within the scope of the internal reporting procedure, these are processed by **VECTOR MAIS** for the receipt and treatment of reports, in accordance with the legal obligation resulting from Law 93/ 2021.
- 7.3. Reports and any associated personal data may be processed by **VECTOR MAIS** third-party service providers for the purpose of receiving reports and technical support. Such third parties, in the capacity of subcontractors, process personal data on behalf of and according to instructions from **VECTOR MAIS**, and are bound by a subcontracting agreement entered into under the terms of the GDPR.
- 7.4. Where necessary, personal data may be communicated to the competent authorities, in the capacity of Personal Data Controllers, for investigation of the infraction.
- 7.5. **VECTOR MAIS** keeps records of received reports and the associated personal data for a period of 5 (five) years, unless storage is required for a longer period within the scope of judicial or administrative proceedings related to the report.
- 7.6. Personal data that is manifestly irrelevant to the processing of the report are immediately deleted, unless collected through registration on a durable and retrievable medium, in order to comply with the legal retention period provided for in the previous paragraph.
- 7.7. Under the legal conditions applicable pursuant to the GDPR, the data subject has the right to request **VECTOR MAIS** provide access to personal data concerning the former, rectification or erasure, or limitation of treatment, as well as to file a complaint with the Portuguese National Data Protection Commission [CNPD].

## 8. Protective measures

- 8.1. **VECTOR MAIS** will not practice nor accept the practice of acts of retaliation against a whistleblower who presents internal complaints under the terms of this Regulation.
- 8.2. An act of retaliation is considered to mean an act or omission - as well as the threat and attempt of such act or omission - that, directly or indirectly, occurring in a professional context and motivated by an internal report causes or may cause the whistleblower material or non-material damages in an unjustified manner.
- 8.3. The regime provided for in these Regulations does not affect any rights and procedural rights recognised to the persons who are referred to as perpetrators of the infraction or who are associated with it.
- 8.4. The rights and warranties provided for in these Regulations may not be waived or limited by agreement.

**Annex I**

## Privacy Information

(provided pursuant to article 13 of the GDPR (General Data Protection Regulation))

<b>Data Controller</b>	VECTOR MAIS – PROJECTOS E OBRAS DE INTERIORES, S.A.
<b>Data collected</b>	Personal data relating to the holders identified below. Identification, contact and other data related to the content of the complaints.
<b>Types of Holders</b>	Whistleblowers, defendants, and third parties who can be identified in the reports.
<b>Purpose</b>	Management and processing of the report of infractions submitted through the Infraction Reporting Channel.
<b>Grounds</b>	Compliance with legal obligations.
<b>Personal Data Retention Period</b>	The reports will be kept for a minimum period of five years and, regardless of this period, while the judicial or administrative processes related to the report remain pending. The above does not prejudice the archiving preservation rules of the judicial courts, administrative courts and tax courts.
<b>Data Transmission</b>	Authorities competent for the investigation of offences, namely: The Public Prosecutor's Office, criminal police bodies, Bank of Portugal, independent administrative authorities, public institutes, general inspectorates and similar entities, and other central services with administrative autonomy under direct administration of the State, local authorities and public associations. Institutions, bodies or agencies of the European Union.
<b>Rights of Data Subjects</b>	Under the terms of the Personal Data Protection Act, the right to access, update, rectify, delete, portability, limitation and erasure of personal data is guaranteed. As well as the right to submit complaints with the Portuguese National Data Protection Commission [CNPD]. The exercise of these rights must be carried out through the following email <a href="mailto:rh@vectormais.com">rh@vectormais.com</a> or by post to Torre Monsanto, Rua Afonso Praça, nº 30 - 12º piso, 1495-061 Algés.