

PARFOIS

**Whistleblower
Strategy
PARFOIS**

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1. Introduction

Parfois is committed to take the appropriate measures to fully comply with the new obligations and adopt the necessary measures to foster a culture of transparency and accountability within the organization in accordance with the best business practices and eventual recommendations issued by the competent authorities.

For this purpose, Parfois specifically has an Internal Reporting System, which includes the Whistleblowing Channel as a reporting mechanism, with whistleblower protection being one of the guiding principles of its operation.

The provisions of this Strategy constitute the minimum regulation applicable to all majority-owned companies of Parfois. In the event of any contradiction between local law and the Strategy, the application of local law shall prevail.

Parfois implements other policies and procedures regarding the treatment of complaints received and reports of labour harassment which shall be address pursuant to the relevant rules on these matters.

2. Reporting Channels

Parfois companies in France (Modessa France SRL) make available an internal reporting channel in compliance with the legal framework established by the law 2016-1691 dated December 9th 2016, modified by the law 2022-401 dated March 21st 2022, and the legal requirements of the legal decree 2022-1284 dated October 3rd 2022.

To make a report click here https://dpo.parfois.com/#/landingpage/parfoisdenuncia/fr_fr

Upon the request of the Reporting person, it shall be possible communicate any breaches verbally through a face-to-face or online meeting with the Whistleblowing Committee.

3. Subjective scope of application

The Whistleblowing Channel includes within its scope of application the entire Parfois organisation, as well as all directors, partners, managers, professionals and/or personnel who provide professional services to Parfois (collectively, "Professionals").

In addition, any individual or legal entity that has had, has or may have a professional relationship with Parfois (hereinafter, "Third Parties") is also encouraged to use the Whistleblowing Channel in the cases regulated in this Strategy, as a formal mechanism and independently of other means of communication made available to Third Parties.

4. Material scope of application

Professionals and Third Parties may communicate any knowledge or reasoned suspicion of irregular conduct that may imply a serious or very serious breach of current legislation, or any of Parfois internal regulations.

5. Main Principles

The principles and corporate guarantees that govern the management of whistleblowing are defined below:

I. Reasonable grounds

To benefit of the protection granted by the Whistleblowing protection regime and this whistleblowing policy, the Reporting person must be in good faith, and should have reasonable grounds to believe, considering the circumstances and the information available to them at the time of reporting, that the matters reported by them are true and the information reported falls within the regime scope.

II. Report Follow-up and feedback procedures

The Whistleblowing protection regime imposes a clear obligation to the relevant entities to diligently follow up on the reports received, and, within a reasonable timeframe, give feedback to Reporting persons. The follow-up and feedback procedures should include assessing the accuracy of the allegations made in the report and addressing the breaches reported by launching an internal enquiry, investigation or any other action deemed appropriated for the remedy of the situation.

Parfois will ensure the Reporting person is informed, in an adequate and timely manner, of the report follow-up and further consequences of the reported breaches.

III. Duty of confidentiality

The safeguard of the confidentiality of the identity of the Reporting person during the reporting process and investigations triggered by the report is an essential principle established on the Whistleblowing protection regime. Parfois ensures the identity of the Reporting person will not be disclosed to anyone beyond the authorized staff members competent to receive or follow up on reports.

The obligation of confidentiality also applies to those who have received information about reports, even if they are not responsible or incompetent for receiving and handling them.

This confidentiality duty can only be derogated in the special context of investigations by national authorities or judicial proceedings, with a pre-notice in writing to the Reporting person, unless such notice would jeopardize the related investigations or judicial proceedings.

The relevant channels made available by Parfois ensure the confidentiality of the report, of the identity of the Reporting person and of any information that can lead to that person.

IV. Prohibition of retaliation

All acts which are prone to or can constitute retaliation against the Reporting person are strictly prohibited. Moreover, when carrying out the necessary acts to properly investigate the breaches reported and designing the preventive measures which may be eventually put in place, Parfois will not trigger retaliation measures to the Reporting person.

Namely, retaliation measures can take the form of: (i) changes to the working conditions such as transfer of duties, change of location of place of work, reduction in wages, change in working hours; (ii) suspension of the employment contract; (iii) a negative performance assessment or employment reference; (iv) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment; (v) failure to renew a temporary employment contract; (vi) lay-off or dismissal; (vii) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry; (viii) cancellation of a contract for goods or services; (ix) cancellation of the act or public procurement contract in accordance with the rules laid out in the Portuguese Code of Administrative Procedures (or any similar and applicable rules in the other countries where Parfois is established or/and has subsidiaries); (x) the triggering of disciplinary action. The threat or attempts to impose retaliation measures are also considered as

retaliation; (xi) demotion or withholding of promotion; (xii) withholding of training; (xiii) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; (xiv) cancellation of a licence or permit and (xv) psychiatric or medical referrals.

In the case where one of the aforementioned provisions is enforced to a Reporting person within two years of the date of the report, Parfois ensures sufficient reasoning is provided for, outside the report of the breach, as well as ensure the permanent compliance with the local labour laws and rules.

Namely, Parfois ensures that the report cannot, on its own, be the reason for triggering any of the actions which can be considered retaliation, unless it is determined that the report is not made based on reasonable grounds.

Parfois has a Protocol prohibiting retaliation that sets out the procedure to prevent, prosecute and sanction any acts of retaliation for making communications in good faith.

V. Cooperation with the public authorities

Parfois shall dully cooperate with the public authorities and make available the relevant information, when requested, in strict compliance with the confidentiality and data protection requirements and rules.

When applicable, Parfois commits to inform the relevant local and European Union entities of the breaches reported which warrant the investigation by the competent public authorities.

VI. Prevention of conflicts of interest

To ensure the highest standards of transparency and quality in the management of reports, Parfois considers the prevention of conflicts of interest as a main principle.

In this way, Parfois is committed to ensuring that reports are handled, and investigations are carried out by impartial people, with no personal or professional interests that could affect their decisions.

VII. Precedence of the Internal reporting channels

According to the applicable legal framework, Reporting persons should only address their reports firstly to external reporting channels when one of the following conditions is met:

- a. In case there is no internal reporting channel in place
- b. When the internal reporting channel is intended to be used exclusively by employees, and the Reporting person is not an employee within the company
- c. When there are reasonable grounds to believe that the breach cannot be effectively addressed within the company or there is a risk of retaliation
- d. When, despite a previous internal report, no timely follow-up procedures were taken by the company or
- e. If the breach constitutes a criminal or an administrative offense with a fine of over 50.000 euros.

Moreover, the Reporting person should only publicly disclose a breach (a) when there are reasonable grounds to believe there is an imminent or manifest danger to the public interest, or there is a low prospect of the breach being effectively addressed, due to the circumstances of the case, or there is a risk of retaliation even in the case of external reporting or (b) when, despite internal and external reporting, no appropriate follow-up procedures were taken.

Reporting persons who make a public disclosure under any circumstance apart from the ones described above do not qualify for protection under the whistleblower's protection regime.

Parfois will encourage Reporting persons to prioritize the use of the internal reporting channels at their disposal to report any breach in the terms set out in this Policy, with precedence to the external reporting channels and to public disclosure.

VIII. Data privacy

In the processing of communications, the personal data and private information of all the people involved will be treated in accordance with the applicable personal data protection legislation.

IX. Anonymity

Parfois will guarantee anonymity as far as possible and, in any case, the confidentiality of the identity of the informant, of the information communicated and of the actions carried out in the management and processing of the same.

In any case, the Whistleblowing Platform shall allow the submission of anonymous communications.

X. Stealth

Parfois will promote that the people involved in the processing and investigation of communications act with the utmost discretion regarding the facts that they know by reason of their position or function.

6. Whistleblowing Committee

Parfois' Management Body appoints the Whistleblowing Committee as the body responsible for the Internal Reporting System.

The members of the Whistleblowing Committee will carry out their responsibilities with competence, probity, integrity, independence and autonomy and in strict compliance with the applicable legal framework.

Parfois may appoint local delegates in the different countries in which the Group operates.