

Parfois' Whistleblower Statute Frequently Asked Questions (FAQs)

A. Parfois whistleblowing channel

Parfois companies in Portugal (Barata & Ramilo, S.A. and Barhold, S.A.) make available an internal reporting channel in compliance with the legal framework established by Law no. 93/2021 of 20 December.

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

Frequently Asked Questions (FAQ)

1. What breaches can be reported?

The Parfois reporting channel aim is to allow the reporting of acts or omissions contrary to the Portuguese and European rules regarding the following topics, among others:

- Public procurement
- Financial services, products and markets
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Public health
- Consumer protection
- Anti-trust
- State aid and corporate tax
- Protection of privacy and personal data
- Security of network and information systems
- Corruption, money laundering and related offences
- Violent and highly organized crime

2. Who can report?

The following persons currently or formerly related to Parfois can report through the Parfois reporting channel:

- Employees
- Members of the governing bodies
- Shareholders
- Service providers and vendors
- Volunteers and non-paid interns (paid or not)
- Persons under the recruitment process or in a pre-trade relationship with the company

The report must be done in good faith and with reasonable grounds that a breach took place, namely, the Reporting Person must believe that the matters reported by them are true and the information reported falls within the scope of this channel.

3. How can I report?

To benefit of the whistleblowing statute, the reporting channel made available by Parfois should be used with precedence to the external reporting channel and to public disclosure.

Parfois makes available the following reporting channel available

https://dpo.parfois.com/#/landingpage/parfoisdenuncia/pt_pt

This channel allows reporting on an anonymous basis or not and optional submission of evidence. All the interactions between Parfois and the reporting person will be done through this channel via the unique generated number and password codes.

4. Who will receive my report?

The report is received by a multidisciplinary team, the Parfois Committee nominated for the purpose of receiving and following up the report. This Committee is comprised by persons within the Parfois organization with adequate responsibilities and powers to receive, investigate and suggest corrective and mitigation measures in view of the report.

In the case where the breach reported is believed to be carried out or is the responsibility of one of the members of the Committee, this person will be removed from the specific process.

The identity of the reporting person and/or any information which directly or indirectly would allow the identification of the reporting person, or any other person(s) identified in the report is confidential and access is restricted exclusively to the Parfois Committee as the team responsible for the reception and follow up of internal reports.

The identity of the reporting person can only be revealed as a result of a legal mandate or court order and after Parfois informs and dully justifies the reasons for revealing the identity in writing, provided this does not compromise any ongoing judicial investigation.

5. How are the reported facts investigated and what consequences can they have?

Parfois will carry out the necessary actions to follow up and investigate any breach reported, which may include, among others, opening an internal inquiry, analyzing any related documentation, further interaction with the reporting person and, when applicable, conducting internal interviews.

The investigation procedures can involve different areas of the organization as well as multidisciplinary teams to review the breaches, always in strict compliance with the confidentiality requirements to ensure the anonymity of the reporting person as well as any other persons involved.

After a thorough investigation, Parfois will determine if the report is to be closed and archived (where it does not fall into the scope of Internal Reporting channel, or it is proved to be non-existent) or will settle all the necessary actions to be taken and the preventive and corrective measures to be implemented as the consequence of the report. These conclusions and respective justification will be duly communicated to the reporting person.

6. When should I expect feedback?

Once the report has been submitted through the appropriate channel:

- Parfois will notify the Reporting person within 7 days of having successfully received the report.

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- Parfois will notify the Reporting person within 3 months of the investigation actions taken and/or the envisaged measures which will be implemented triggered by the report.
- The Reporting Person may request within 15 days of the conclusion of the process a summary of the conclusions of the investigation of the report.

In any case, Parfois may reach out to the reporting person, via the reporting channel platform to clarify or provide additional information essential to the investigation of the report.

7. How do I check the status of my report?

The reporting person can access the status and interact with Parfois through the reporting channel platform with the respective access codes.

8. How does Parfois ensures the anonymity of my report?

The report can be done anonymously when the reporting person selects the corresponding field. The system and platform implemented by Parfois ensures that the Parfois Committee in charge of receiving and following up the report does not have access to the identification or any of identification elements of the reporting person.

9. How does Parfois treat my Personal Data?

The internal reporting channel made available by Parfois is designed, established and operated in a secure manner ensuring that the confidentiality of the identity of the Reporting person and any third party mentioned in the report.

The processing of personal data collected by Parfois in this context will be undertaken in strict compliance with the local rules on Data Protection and Parfois Privacy Policy which can be accessed here: https://dpo.parfois.com/#/landingpage/parfoisdenuncia/pt_pt.

Moreover, Parfois ensures that personal data manifestly not relevant for the handling of a specific report will not be collected or, if accidentally collected, shall be deleted without undue delay.

10. For how long does Parfois keep information on my report?

Parfois will keep and archive every report received, and any supporting documentation produced for a period of 5 years or, in the event of judicial or administrative proceedings regarding the report, for a longer period.

11. Can I be negatively affected by reporting?

To benefit of the protection granted by the Whistleblowing protection regime and the whistleblowing policy of Parfois, 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 are true.

Parfois shall not trigger any retaliation measure against the reporting person solely based on having submitted a report and provided the report is done in good faith and with reasonable grounds.

B. Whistleblower statue

The whistleblower legal statue granted to reporting persons under the applicable legal framework can be consulted in [Law no. 93/2021 of 20th December](#).