

## Whistleblowing Policy

i3S, IBMC, INEB and IPATIMUP

The Whistleblowing Policy was designed based on the principle of confidentiality and privacy in handling reports, minimisation of knowledge, full respect for the General Rules for Preventing Corruption (GRPC) and Data Protection Policy (DPP), as well as the protection of the Whistleblower (Law no. 93/2021 of 20 December, or Whistleblower Law).

1. i3S has an internal reporting channel managed by an external software of easy, secure and confidential access whose link is available on the i3S website.
  
2. The reporting channel receives information on breaches - improper practices considered unethical or corruption - within the scope of:
  - a. Public procurement
  - b. Financial services and prevention of money laundering and terrorist financing
  - c. Unsafe products
  - d. Transport safety
  - e. Protection of the environment
  - f. Radiation protection and nuclear safety
  - g. Food and feed safety
  - h. Animal health and welfare
  - i. Public health
  - j. Consumer interests
  - k. Protection of personal data
  - l. Network and information systems security
  - m. Protection of the financial interests of the European Union
  - n. Functioning of the internal market and distortions of competition
  - o. Violent and organized crime
  - p. Conflicts of Interest
  - q. Professional duties
  - r. Responsible conduct in research <sup>1</sup>

3. The channel may receive complaints from employees, subcontractors, suppliers, collaborators, salesmen, trainees, research fellows, students, i.e., all those who, within the scope of their work-related activity, have a connection with i3S.
4. The reporting channel is not the proper place to address HR-related issues.
5. The reporting channel is not a channel for demands and claims.
6. The reporting channel has a Portuguese version and an English version.
7. The complaint is made in written form.
8. The complaint can be made anonymously.
9. The report may concern the following:
  - a. an infraction committed
  - b. an infraction that is being committed
  - c. an infraction that is reasonably expected to be committed
  - d. an infraction that is being covered up
10. i3S ensures the confidentiality of the procedure, the information provided in the complaint, as well as the persons involved. All this information is considered confidential.
11. Persons who report a breach with information obtained within the scope of his/her work-related activity is a Whistleblower.
12. Reporting persons enjoy the protection provided by Law if they are in good faith, meaning that in light of the circumstances and information available to them at the time of reporting, they have reasonable grounds to believe that, that the matters reported by them are true.
13. i3S ensures that the Whistleblower is not, under any circumstances, harmed. Retaliation is not allowed.
14. The public disclosure or communication of false information is a very serious infraction. False reporting is punishable with the most serious disciplinary measure.

15. The person competent to receive and follow up on the complaint will only forward it to other players if this is necessary for the enquiry, investigation and resolution of the matter brought.

16. Whenever this happens, it is done anonymously, if this does not affect the investigation and resolution.

17. The Whistleblower receives information about the reception of the complaint and the follow-up given to it.

18. The players involved guarantee confidentiality and that there is no conflict of interest in dealing with the complaint by signing a proper statement.

19. Violation of confidentiality by the Officer in Charge or any other involved party is considered a very serious offence and leads to disciplinary measures.

20. Persons involved in the allegations have all procedural rights and guarantees, namely the assumption of innocence and the guarantees of defence in criminal proceedings. They also enjoy all the guarantees of confidentiality mentioned above with regarding their identity.

21. The Officer in Charge shall appreciate, or those who have been asked to appreciate the situation, and propose the corrective and/or punitive measures to be applied.

22. The punitive measures are appropriate to the gravity of the facts and to the recurrence of the offender.

23. When the offender does not have a labour link with the entity the measures of the disciplinary procedure are also applied, with the necessary adjustments.

24. The internal reporting channel prevails over external or public reporting channels.

25. In the event of a conflict of interest with the Officer involved in the infraction, an external reporting channel must be used.

1 – for further information about Responsible Conduct in Research check the link:

<https://www.i3s.up.pt/responsible-research.php>

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