



I3S WHISTLEBLOWING POLICY

14/11/2023

The Whistleblowing Policy was designed based on the principle of confidentiality and privacy in handling reports, minimisation of knowledge, full respect for the General Scheme for the Prevention of Corruption (GSPC) and the General Data Protection Regulation (GDPR), 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 has a Portuguese version and an English version.
3. In the event of a conflict of interest with the person responsible for receiving the reports, an external reporting channel must be used.
4. The internal reporting channel prevails over external or public reporting channels.
5. The reporting channel is not a channel for demands and claims.
6. In this channel, reports can be made in written form or by voice recording. It is also allowed to make the reports in person to the Reports Receptor (the Coordinator of the Unit for Responsible Conduct).
7. The reports can be made anonymously.
8. The reporting channel receives information on breaches within the scope of:
 - a. Moral and/or Sexual Harassment;
 - b. Conflicts of Interest;
 - c. Ethics and Integrity: misconduct in research and/or scientific fraud¹;
 - d. Professional duties;
 - e. Corruption;
 - f. Public procurement;
 - g. Financial services, products and markets, and prevention of money laundering and terrorist financing;
 - h. Product safety and compliance;
 - i. Transport safety;
 - j. Protection of the environment;
 - k. Radiation protection and nuclear safety;
 - l. Food and feed safety;
 - m. Animal health and welfare;

¹for further information about Responsible Conduct in Research check the link:
<https://www.i3s.up.pt/responsible-research.php>

- n. Public health;
- o. Consumer protection;
- p. Protection of privacy and personal data;
- q. Security of network and information systems;
- r. Breaches affecting the protection of financial interests of the European Union;
- s. Breaches relating to the internal market and competition rules, state aid and corporate taxation;
- t. Violent, especially violent and highly organised crime, as well as organised and economic-financial crime.

Note: The reporting channel is not the proper place to address Human Resources related issues, except in case of moral and/or sexual harassment, which can be reported through this channel. In this case the report will be sent to the Head of the Human Resources Unit.

- 9. The report may concern the following:
 - a. an infraction that has been 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. The channel may receive reports 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.
- 11. i3S ensures the confidentiality of the procedure, the information provided in the report, as well as the persons involved. All this information is considered confidential.
- 12. Persons who report a breach with information obtained within the scope of his/her work-related activity is a Whistleblower.
- 13. 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.
- 14. i3S ensures that the Whistleblower is not, under any circumstances, harmed. Retaliation is not allowed.
- 15. i3S ensures that, in the case of reports of sexual and moral harassment and research misconduct and unacceptable practices (not covered by the General Scheme for the Prevention of Corruption (GSPC) and the Protection

of Whistleblowers - Law no. 93/2021 of 20 December), whistleblowers benefit from the protection that may be granted through the adoption of internal regulatory mechanisms.

16. The public disclosure or communication of false information is a very serious infraction. False reporting is punishable with the most serious disciplinary measure.
17. The person competent to receive and follow up on the report will forward it to other players if this is necessary for its enquiry, investigation and resolution.
18. Whenever the report is forwarded to other players, it will be done anonymously as long as this does not affect its investigation and resolution.
19. The Whistleblower receives information about the reception of the report and the follow-up given to it.
20. The players involved guarantee confidentiality and that there is no conflict of interest in dealing with the report by signing a proper statement.
21. Violation of confidentiality by the Officer in Charge or any other involved party is considered a very serious offence and leads to disciplinary measures.
22. 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 regarding their identity.
23. The Officer in Charge and/or other designated people, will analyse the reported situation, and propose the corrective and/or punitive measures to be applied.
24. The punitive measures will be appropriate to the gravity of the facts and to the recurrence of the offender.
25. 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.