



Internal Information System Policy Whistleblowing Channel

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1. PURPOSE, SCOPE AND GUIDING PRINCIPLES

1.1. Purpose

The purpose of this Policy is to explain to all users of the Internal Information System (“IIS” or “Whistleblowing Channel”) of the Catalan Institute of Nanoscience and Nanotechnology (“ICN2”) the operation and features of the IIS, and how it may be accessed by those users. In other words, this Policy explains the general operational principles of the IIS as well as the principles of protection of the informant and the accused.

The Whistleblowing Channel is the tool through which all members of the ICN2 (e.g., members of the governing body, managers and workers, as well as third parties), may inform the institute of the possible commission of crimes or serious/very serious administrative offences, and the persons who know about them (the informants or whistleblowers).

Those third parties, e.g., those also allowed to file a complaint, must include at least the trustees and members of the Board including non-executive members, self-employed persons, any person working for or under the supervision of contractors, subcontractors and suppliers, former workers, interns, selection process or pre-contractual negotiation candidates, and volunteers and trainees of the institute. However, without prejudice to the fact that the ICN2 will provide for all the guarantees contained in this rule, it should be noted that the legislation in force only provides for protective measures for individuals who have or have had an employment or professional relationship with the ICN2 in relation to the matters set out in article 1.2 below.

The Board of Trustees wishes to set up a mechanism to ensure compliance with the law and to guarantee the effectiveness of the attached Code of Ethics and the internal protocols of the ICN2, thus preventing those documents from becoming mere statements of intent and establishing a policy of zero tolerance toward illegality.

Furthermore, the use of this Channel may allow ICN2 to adapt its activity to the legislation in force, guarantee compliance with its internal regulations, and reduce the risk of the internal commission of criminal or unlawful conducts, thus protecting not only the entity but also its employees and representatives.

The Board of Trustees of the ICN2 will be responsible for the implementation of the Whistleblowing Channel, after consultation with the workers’ legal representatives. Furthermore, it will be responsible for appointing or dismissing the Internal Information System Officer (the “Officer”), who must be a person with sufficient training and knowledge to assume this responsibility (the System must ensure that communications may be processed effectively). The Officer may be a sole individual or collective body. The Officer must be independent from the other members of the institute and may not receive instructions of any kind in the exercise of their functions. Should a collective body be appointed as the Officer, one of its members will be designated to receive the complaints, and the person responsible for the internal investigation of each complaint will be appointed in each case.

The ICN2 will provide the Officer with the human and material resources they may need for the performance of their mission. Once the Officer is appointed, the Anti-Fraud Office of Catalonia, acting as the Independent Whistleblower Protection Authority, must be informed thereof.

The Officer will be responsible for supervising the proper operation of the IIS; receiving and processing the complaints received through the Whistleblowing Channel; complying with the provisions of this Policy and the Received Information Management Procedure; and checking compliance with the rights and duties of the parties involved in the IIS.

1.2. Scope and compulsory application

Objective scope. What can and cannot be reported through the Whistleblowing Channel?

Through the Whistleblowing Channel, complaints may be submitted on acts or omissions that occur or have occurred within the scope of the ICN2 and that amount to an infringement in a workplace or professional context of a rule or principle affecting the institute. The following may be reported:

- a) Conducts that amount to a crime or serious/very serious administrative offence, such as fraud, the payment of an undue fee, non-payment of a tax, or price fixing in a public tender;
- b) Any act or omission defined by European Union law whenever:
 - i. it concerns matters relating to public procurement; financial services, products and markets and the 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; protection of privacy and personal data; and security of networks and information systems.
 - ii. it affects the financial interests of the European Union or,
 - iii. it has an impact on the internal market, e.g., an infringement of EU competition and state aid regulations.

Any events not contemplated in this section, including matters closely linked to human resources or personnel policies (e.g., holidays, remuneration, relations between employees, interpersonal conflicts), and recommendations or suggestions not linked to regulatory compliance issues or to the provision of services by the institute, are incidents that are not meant to be reported through the Whistleblowing Channel.

In the event of doubt on the part of the informant regarding the nature of the act concerned, as long as the informant acts in good faith, the act may be reported without problem. The Officer will be responsible for reviewing its content and analysing its possible admission, which will be reported to the informant.

Concerns

In the event that the addressees of this Policy have concerns about regulatory compliance or the use of the Whistleblowing Channel itself (e.g., how to interpret a rule or how to act if a certain fact has occurred), they may send them to canaldenuncias@icn2.cat, an email address that in no event may be used for the communication of the complaint itself.

Subjective scope. Who is this Policy addressed to?

This Policy is addressed to all persons who in any way provide services in an occupational or professional form to the ICN2, e.g., trustees and members of the Board, the management or supervisory body of the institute including non-executive members, workers and usual external collaborators (as described in article 1.1), as well as any person who may act in the name or to the benefit of the ICN2 and third parties without any geographical restriction. The Policy will also apply to (i) all of them, whether with informant, investigated/accused person or witness status, and (ii) the Officer as the person responsible for receiving and/or processing the complaints that may be received through the Whistleblowing Channel.

Compulsory compliance:

Compliance with the Policy is an employment or contractual obligation on all addressees (with the exception of third parties with no connection to the ICN2). Therefore, non-compliance therewith may be disciplined under the labour regulations where the institute performs its function (e.g., the Collective Agreement in force), as well as under the relevant regulations or contractual document.

All addressees of this Policy, excluding the aforementioned third parties, are bound to report the incidents of which they become aware through the means covered in the following chapter.

1.3. Legal framework

The organisation, use and operation of the Whistleblowing Channel will be governed by this Policy, as supplemented by the Received Information Management Procedure. Furthermore, the Channel will be subject to the rules that may be issued by governmental agencies in relation to whistleblowing channels, or other rules that may govern aspects related thereto (e.g., laws governing data protection or the prevention of money laundering and terrorist financing and, significantly, all laws governing the protection of basic rights).

1.4. Guiding principles

This Policy reflects, among other things, the will of the Board of Trustees of the ICN2 to establish a commitment to zero tolerance of crime, administrative offences and illegal acts, and to comply with the law and good practice.

Therefore, this set of rules governing the obligation to report incidents to the Officer and the procedure to manage the same will always reflect respect towards the principles of *freedom, independence and impartiality, confidentiality, indemnity, protection and prohibition of retaliation, integration and trust*. That is to say:

a) Freedom: As established in point 2, all the addressees of this Policy may freely access it and its procedures, as well as the Whistleblowing Channel.

b) Independence and impartiality: As the body entrusted by the ICN2 with receiving and managing the complaints that may be submitted through the channel, the Officer will always perform those functions in compliance with the principles of independence and impartiality. The Officer will always objectively respect the rights and guarantees of all the parties involved in the process.

c) **Confidentiality:** The information received through the Whistleblowing Channel will always be treated as strictly confidential. That is to say, the Officer will never disclose (i) the names of whistleblowers acting in good faith, or any data or information from which their identity may be directly or indirectly inferred; (ii) the identity of any other person identified in the complaint while the investigation phase is still ongoing; (iii) the complaint received itself. The Officer will prevent any measure leading to the discovery of the above.

However, the Officer may transfer information related to the complaint in the following cases:

- To other departments of the ICN2 whenever such disclosure is essential to the smooth progress of the investigation, a circumstance that will be determined early in the investigation in order to identify the persons who will have access to information related to the complaint. Access to information may also be permitted to other departments throughout the investigation conducted whenever necessary depending on the progress of the investigation to be conducted;
- To third parties whenever this is necessary to hire their services to ensure the smooth progress of the investigation (e.g., lawyers, consultants, experts, detectives), a circumstance that may be determined throughout the investigation process conducted. In those cases, a confidentiality commitment will be requested from that third party;
- To the governing body of the ICN2 whenever deemed necessary given the possible severity of the events;
- Whenever there is a binding legal obligation or court order to do so;
- To the Human Resources Department, once the investigation is completed and a positive conclusion is reached about the possible responsibility for the event. This will be done to ensure that, where appropriate, the relevant punitive measure may be imposed on the accused person responsible for the event. That Department may also have access to said information whenever the adoption of precautionary measures is necessary in respect of an investigated worker in the early phase of the procedure;
- To other departments of the ICN2, once the investigation is completed, in order to coordinate with them the implementation of improvement measures regarding the processes of the ICN2 recommended in the final findings report.

In all the above cases, a confidentiality statement must be requested, the identity of the persons concerned (notably the informant) will never be disclosed whenever known, and no copy of the report itself will be provided. Furthermore, the data protection obligations described in point 7 of this Policy will be taken into account.

Protection of the identity of the informant may be waived in the following cases:

- Whenever there are special circumstances that make identification of the informant advisable, provided they have given their consent thereto;
- In the event of an express demand from governmental agencies or the courts in the context of an investigation, and specifically, whenever this is necessary to safeguard the accused persons' right to defence.

In the event that the identity of the whistleblower is disclosed, they will be given prior notice thereof, except whenever this may compromise the investigation or court procedure, or

whenever this is prohibited by a rule with the force of law (e.g. the act on the prevention of money laundering).

In any event, this data transfer will be conducted under the applicable data protection legislation.

This protection of the confidentiality of the whistleblower's identity will not apply whenever the whistleblower themselves intentionally reveals their identity in the context of a public disclosure.

d) Indemnity, protection and prohibition of retaliation: No retaliation or attempted retaliation of any type will be taken by ICN2 against any informant acting in good faith. The ICN2 will also specifically ensure that no whistleblower acting in good faith suffers any type of negative outcome arising from the filing of a complaint (e.g., suspension from work, dismissal from their job; degradation or denial of promotions).

The ICN2 will ensure that none of its members perform any act that may be taken as retaliation by the whistleblower. This guarantee will also extend to any witness or third party (including facilitators, defined as persons who may assist the whistleblower in submitting the complaint and the legal representatives of the workers who may advise or support the whistleblower), and to any legal persons owned by the whistleblower who collaborate in, or are related to, the investigation of the reported act.

The informant will be deemed not to have acted in good faith when they act in the knowledge that the facts reported are false or act with manifest contempt for the truth.

The intention to enact revenge, harass the exposed person, damage their honour, or harm them occupationally or professionally, may be viewed as evidence of lack of good faith.

Notwithstanding any criminal and civil liability that may arise from the above action, whenever possible, the whistleblower acting in bad faith will be disciplined under the applicable employment regulations. Acts reported by mistake will not be penalised provided that the whistleblower acted in good faith.

e) Integration: The ICN2 will integrate the different whistleblowing channels it may have implemented into one single channel for better management thereof, notwithstanding the specific features of each channel that must be respected in managing the same.

f) Trust: The ICN2 will generate trust among all its members in the use of the Channel, to make it as efficient as possible.

2. WHISTLEBLOWING CHANNEL: Filing a complaint

2.1. Complaint submission mechanisms

The addressees of this Policy may submit the complaints referred to in point 1.2 above through the Whistleblower Channel platform that ICN2 has implemented, i.e., the platform accessible through **whistleblower-channel.icn2.cat**

If the informant so requests, they may also submit their complaint through a face-to-face meeting with the Officer within no more than 7 days of their request. In this event, subject to the prior authorisation of the informant, minutes will be drawn up to record the facts reported. The informant will be offered the opportunity to review and, where appropriate, amend or supplement, the transcript of the information.

In order to ensure the confidentiality of the channel, only those responsible for the management and processing thereof, i.e., the Officer and the persons referred to in article 7 below, may have access to the contents of the complaints submitted. Furthermore, the Whistleblowing Channel platform will always be protected by a password that must be changed every 3 months and must only be known by the aforementioned individuals. These and any other tools that may be used to process the complaints will also include any technical and security measures required to ensure the confidentiality of the Whistleblowing Channel.

The above is a description of all the internal mechanisms of the ICN2 through which a complaint may be sent, and must preferably be used. However, informants may also send their complaints to an external body: the Independent Whistleblower Protection Authority (i.e., the Anti-Fraud Office of Catalonia) or any other authority competent to receive complaints.

Also accepted are communications made through self-incrimination, i.e., through complaints where the conduct reported by the whistleblower is self-incriminating. On those occasions, the whistleblower will have the dual status of whistleblower and accused person, and their rights and obligations as such must be observed.

In the event that any person in the ICN2 other than the Officer receives a complaint through any means, they must immediately send it to the Officer and keep the information received confidential. Breach of this obligation may be subject to a disciplinary penalty.

Furthermore, no objection will be raised to the processing through this Policy and the Received Information Management Procedure of any type of information that may be received from external sources, including from any governmental agencies, courts or other means of reporting not provided for in this Policy. In addition, the Officer may also submit to this Policy any facts detected in the normal performance of their activity. In all these events, the complaint received or the facts detected will also be processed as established in this Policy and the Received Information Management Procedure.

2.2. Basic information

Complaints submitted through the Whistleblowing Channel must contain insofar as possible at least the following information:

- The event, behaviour or irregularity being reported, as well as the date on which it took place. The informant will not be required to conduct a judicial/legal classification or valuation of the event investigated, although they must have reasonable grounds to believe that the fact reported is true;
- The reason why they believe the incident is suspicious or irregular;

- The identity of the persons responsible for the above if known (complaints about unknown but identifiable persons may be admitted);
- Elements of proof that may be used depending on the act or irregularity committed (the provision of proof by the informant is not compulsory but is advisable). In no event may evidence be obtained illegally or by infringing basic rights. Should any doubt arise in this respect, the informant will refrain from obtaining the evidence without the advice of the Officer or third party they deem appropriate;
- Identification of the informant, although anonymous communications may also be accepted. In the event that an anonymous complaint is received through the Whistleblowing Channel, the information received will be processed with the precautions required by this type of communication, without this circumstance preventing the application of this Policy or the Received Information Management Procedure. In this scenario, it is important to bear in mind that the platform allows constant communication to be maintained with the anonymous whistleblower through a tracking code provided by the platform. It should also be noted that, if the anonymous whistleblower loses the tracking code, it will be impossible to recover it and they will therefore not be able to access the tracking of their complaint, unless they resubmit the same.
- Clarification of whether or not the whistleblowers or third parties are in a risk situation that must be urgently remedied or in possible serious immediate risk situations.

All of the above is requested on the platform's home screen, with the whistleblower being required to fill in the spaces provided.

Users may also access the user instructions of the Whistleblowing Channel through the explanatory video posted at <https://youtu.be/3zh5g7kG15g>.

In any event, informants are bound to make the complaint truthfully without any misstatements, notwithstanding the fact that the information they transmit may refer only to the indications of infringement provided in section 1.2. Using the Whistleblowing Channel in bad faith (e.g., making false or groundless complaints) is forbidden and will be penalised by the ICN2 whenever possible.

The complaint submission platform of the ICN2 guarantees the anonymity and confidential processing of the information that may be received through it, as it is managed by a third party outside the ICN2 and only expressly authorised individuals may have access thereto.

2.3. Conflicts of interest

Should the complaint directly or indirectly affect the Officer, the platform makes it possible assign the same to a second manager, enabling a substitute to be appointed who must assume the task of managing the complaint instead of the person affected by the conflict of interest.

Whenever a conflict-of-interest situation arises involving the Officer, failure by the Officer to abstain from their duties will amount to a very serious infringement of this Policy with the consequent employment or contractual sanctions that may be imposed.

3. PROTECTION AND OBLIGATIONS OF THE INFORMANT AND THE ACCUSED PERSON

The ICN2, through the Officer, will ensure that any informant acting in good faith and using the Whistleblowing Channel in accordance with this Policy will be protected through the following procedural principles:

- a) It will preserve the confidentiality of, and treat as confidential, the identity of the whistleblower, the identity of the individuals who may be mentioned in the complaint submitted by the whistleblower, and the acts exposed. This means that only the authorised individuals identified above will be able to access the information relating to the complaint, and they will not be able to share the same with any other third party.
- b) It will guarantee anonymity whenever the complaint is filed anonymously. In other words, whenever the informant makes the complaint anonymously, their identity will never be disclosed. This is guaranteed by the platform being managed by a third party outside the institute.
- c) It will provide an interpreter or translated documentation whenever needed by the informant to understand the scope of their rights and obligations, or the use of the Whistleblowing Channel.
- d) It will enforce an absolute ban on any type of reprisal, including threatened and attempted retaliation, in connection with the information that may be provided for the investigation by the informant. In other words, if the informant acting in good faith endures any kind of retaliation for their collaboration with the institute, the instigator thereof will be punished immediately whenever possible. Should the informant believe they are the victim of retaliation, they must report the situation to the Officer immediately.
- e) In general, the informant will receive support from the ICN2 during the time it takes to process the complaint and conduct the procedures that may arise in connection thereto, and will ensure compliance with this Policy and the Received Information Management Procedure.

Furthermore, informants must meet the following obligations when using the Whistleblowing Channel:

- a) They must act in good faith.
- b) They must not report false facts or facts manifestly contrary to the truth.
- c) They must provide as much detail as possible about the facts reported and collaborate with the investigation.
- d) Insofar as possible, they must follow up the complaint submitted to make sure that they are updated about its processing and able to respond to any requests for clarification or additional information that may be made.
- e) They must keep confidential the information they provide, the very existence of the complaint, and its subsequent handling procedure.

Furthermore, the ICN2 will guarantee the rights of the person accused, including their right to defend their honour, to presumption of innocence, not to be subject to prospective investigations, and to have access to the facts attributed to them and be heard about them.

This is all implemented in the Received Information Management Procedure which supplements the content of this section.

The Officer will guarantee that the rights and obligations of the informant and the accused person are respected throughout the handling of the complaint and any further actions, including court proceedings.

4. ESSENTIAL PRINCIPLES OF THE RECEIVED INFORMATION MANAGEMENT PROCEDURE

Whenever the Officer receives a complaint, notwithstanding the provisions of the Received Information Management Procedure, they must launch the internal investigation phase on the facts reported, the essential guiding principles of which will be as follows:

- a) Once the complaint has been received through any of the means provided for in this Policy solely by the persons authorised to receive it, within no more than 7 calendar days of receipt of the complaint by the Officer or external third party, as the case may be, the Officer will send the informant a record of receipt, provided that this does not jeopardise the confidentiality of the communication.
- b) Whenever necessary, for instance, when the information received is insufficient, the Officer may request from the informant additional information on the facts reported, throughout the investigation that may be conducted.
- c) The Officer will study the facts contained in the complaint received and will conduct an initial analysis of its plausibility. In other words, the Officer will check whether or not the reported events should be investigated, and thus decide whether to admit the complaint or reject it. This decision will be notified to the informant;
- d) In the event that the complaint passes the above plausibility test, the Officer will launch an internal investigation conducting such investigative measures as they deem necessary, such as the conduct of an interview with the informant (whenever not anonymous), witnesses or the accused person, and/or the analysis of any documentation that may be deemed necessary.
- e) During the conduct of the entire investigation, the Officer will respect at all times the rights and guarantees contained in this Policy, in the Received Information Management Procedure, and in the legal system, such as proportionality, impartiality, independence and the right of the parties affected by the investigation to defend themselves, to presumption of innocence, to protect their honour and to benefit from the adversarial principle.
- f) Finally, based on the facts that may have been analysed, the Officer will issue a closing report evaluating the observed facts and reaching a conclusion about them. Where appropriate, the Officer may also include in their report a proposal for the adoption of measures to improve the institute's procedures.
- g) Based on the findings highlighted by the Officer in their report, the ICN2 will analyse, as appropriate, the adoption of any disciplinary or contractual measures or the commencement of any legal proceedings.

5. COMMUNICATION

5.1 Communication

A copy of this Policy will be delivered, by electronic means or on paper, to all of its addressees, thus ensuring that they are all aware of their duties, rights and guarantees in relation to the use of the Whistleblowing Channel. In any event, smooth and continuous access to this Policy will be guaranteed to all its addressees. In the event that the addressees of this Policy do not speak Catalan, they must be provided with a translation into a language they can understand. Evidence that this Policy has been delivered to all its addressees will be kept.

In addition, this Policy will be posted in a separate section of the home page of the ICN2, where it will be easily identifiable to make it easily accessible.

5.2. Interpretation

In the event of doubt regarding the interpretation of this Policy, queries will be submitted for resolution to the Officer via the aforementioned email address.

5.3. Training and awareness-raising

Furthermore, the ICN2 will provide specific training on the use of the Whistleblowing Channel to all its members, which will be backed by this Policy and which must cover in all cases the following points:

- The existence of a Whistleblowing Channel in the institute to attain the aforementioned purposes;
- How to use the Whistleblowing Channel properly and to understand its process;
- The rights and duties of the users of the Whistleblowing Channel;
- The obligation of the addressees of this Policy to inform the institute of any of the acts referred to in section 1.2.

The ICN2 will also provide specific training on the handling of the Whistleblowing Channel to the persons responsible for receiving and processing the complaints, in this case the Whistleblowing Officer. The ICN2 must ensure that the Officer is trained and qualified to manage the Whistleblowing Channel.

The ICN2 will keep evidence of the courses or other training/awareness-raising activities that are provided to all the users of the Whistleblowing Channel.

5.4. Commitment of the addressees of the Policy

All members of the ICN2 must be aware of the Policy, actively contribute to complying therewith, and report both the breaches they discover and the weaknesses they may note in its content or development. The Board of ICN2 will specifically ensure that these obligations are enforced.

6. HISTORY, APPROVAL, ENTRY INTO FORCE AND AMENDMENT OF THE POLICY. EVIDENCE

6.1. History, approval and entry into force

History:

The following table itemises the different versions of the Policy that have been drafted, as well as their dates and the subsequent amendments that each version of the document may have undergone:

VERSION	AUTHOR	DATE	AMENDMENTS
1.0	External consultant	April 2023	Initial version
2.0	To be determined	To be determined	To be determined

Approval and entry into force:

This Policy will be approved by the Board of Trustees of the ICN2. The approval date will be stated in the record. That date is the date on which the document will enter into force in the institute.

6.2. Monitoring, ongoing adaptation and reform of the Policy

Ongoing monitoring and adaptation:

Regular revisions of the content of the Policy will be established to ensure it is continuously adapted to the actual situation of the ICN2, legislative or jurisprudential changes, etc. Furthermore, its use will be monitored and the performance of the Whistleblowing Channel system may be measured through the use of indicators. All the foregoing is subject to the principle of continuous improvement that governs the processes of the ICN2.

Amendment:

The Board may amend the Policy at its own behest and/or at the behest of any addressee of this Policy.

6.3. Safekeeping of evidence

The Officer will ensure the safekeeping of all the evidence proving that the training, control, supervision and correction activities have been performed in the ICN2 in accordance with the above sections. This will be performed under the relevant data protection regulations applicable to each area of activity of the ICN2.

7. DATA PROTECTION

To ensure compliance with the data protection legislation, and in general, to prevent the misuse of information, the ICN2 will ensure, when handling the Internal Information System and with respect to the informant, the person accused and third parties, that the processing of personal data resulting from the application of this Policy will be governed by Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016; the Data Protection and Digital Rights Act 3/2018, of 5 December; Organic Act 7/2021, of 26 May, on the protection of personal data processed for the purposes of prevention, detection, investigation and prosecution of criminal offences and enforcement of criminal penalties; Act 2/2023, of 20 February, regulating the protection of persons who report violations of the law and the fight against corruption; as well as the provisions of the Received Information Management Procedure on the protection of personal data.

APPENDIX I

Definitions:

- a) **Whistleblowing Channel:** tool made available by ICN2 to all its members and third parties to enable them to report facts that may amount to a crime or serious/very serious administrative offence in a secure, confidential and/or anonymous manner.
- b) **Informant or whistleblower:** identified or anonymous person who reports to the ICN2 any of the above facts in the reasonable belief that the information is true at the time of reporting. They may be a member of the institute or a third party. It should be noted that Act 2/2023, of 20 February, regulating the protection of persons who report violations of the law and the fight against corruption, will only protect individuals who have an employment or professional relationship with the ICN2 and who report an act amounting to a criminal offence or a serious/very serious criminal or administrative offence. This is without prejudice to the protection that may be provided to informants by other regulatory bodies.
- c) **Accused person:** person presumed to be liable for the acts reported. The accused person also enjoys certain rights that are developed in the Received Information Management Procedure.
- d) **Internal Whistleblowing System Officer:** a sole individual or collective body appointed by the Board of Trustees of the ICN2 responsible for the handling and/or processing of the Whistleblowing Channel and any subsequent internal investigations that may be conducted.
- e) **Retaliation:** acts or omissions that are prohibited by law or that directly or indirectly involve unfavourable treatment placing the persons affected by them in a particularly disadvantageous position compared to others in the same occupational or professional context, solely because of their status as informants or because they have made a public disclosure. Examples of those acts or omissions include dismissal, lack of internal promotion, job changes, etc.

APPENDIX II

Receipt of the Internal Information System Policy

By signing this document, I certify that I have received, read and understood the Internal Information System Policy. In turn, I undertake to observe and comply with it.

I also understand that should I infringe its content, the ICN2 may impose a disciplinary sanction. I also undertake to be keep up to date with any changes to the Policy, and to read future revisions that may be made in this respect.

DATE:

NAME:

SIGNATURE: