



1. OBJECTIVE AND SCOPE

Define the internal criteria and/or methodologies for handling complaints, based on Law No. 93/2021 of December 21 (“BM Law”), which entered into force on June 18, 2022.

2. HYDRACOOILING WHISTLEBLOWER PROTECTION POLICY

Hydracooling, Lda., is committed to guaranteeing the protection of people who wish to report an infringement or possible irregularity, in accordance with European Directive 2019/1937. Hydracooling prohibits retaliation against any person who, having reasonable grounds to believe that a violation or suspected irregularity exists, reports it and provide information obtained in a professional context.

This whistleblower protection policy applies to the entire organization.

2.1 What matters should be reported:

Whistleblowers may communicate information obtained in a professional context, regarding suspicions of irregularities or violations – current or potential – of:

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- Financial services, products, markets and prevention of money laundering and terrorist financing;
- misuse of financial resources;
- theft, breach of any duty of confidentiality; fraud, embezzlement or bribery; • Product safety and compliance;
- Transport security;
- Environmental Protection;
- Radiation protection and nuclear safety;
- Food safety for human and animal consumption, animal health and welfare;
- Public health;
- Consumer protection;
- Protection of privacy, personal data and security of the network and information systems;
- Violent crimes, especially violent and highly organized crimes.

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3. WHO CAN REPORT:

All workers who perform or have performed work with Hydracooling can report information, including temporary workers, independent workers, interns, volunteers or recruitment candidates, service providers, suppliers and members of the board of directors.

4. HOW CAN REPORT:

Violations or suspected irregularities can be reported by email:

canal.denuncia@hydracooling.pt.

When reporting, the perpetrator must always provide the necessary information to properly investigate the situation and communicate the consequences of the report. Complaints that are not sufficiently substantiated, that lack reasonableness or factual information will not be investigated.

In the claim email you must indicate:

- Full name of the complainant, although anonymous complaints are accepted;;
- Email (mandatory, if you want to be aware of the progress and conclusions of the process);
- Telephone number (if you authorize us to contact you, particularly to clarify doubts within the process);
- Relationship with Hydracooling (employee, former worker, temporary worker, freelancer, intern, volunteer, recruitment candidate, service provider, supplier or Board member);
- Type of complaint (corruption, security, privacy of personal data, others);
- Description of the complaint. In this field they must indicate the date and place of the reported events, people involved, affected and identification of witnesses (if any) and description of the events;
- If the complainant has documents (e.g. emails), they should attach them to the report to assist in the investigation;
- The language of the complaint must be simple and clear, explaining the reasons for it so that it can be understood by all those involved.
- After the report, **a notification of receipt of the report is sent to the author, within a**

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maximum period of 7 days. Hydracooling will manage complaints confidentially and may, if it considers appropriate and necessary, communicate the violation or suspected irregularity to third parties, including lawyers, regulatory and government entities or criminal police agencies. **Within a maximum period of 3 months** from the date of receipt of the complaint, or 6 months when its complexity justifies it, the author will be informed of the reasons and the measures planned and adopted to follow up and conclude the complaint. The latter must maintain confidentiality with respect to all information received.

5. HOW TO PROCEED – COMPLAINT MANAGEMENT

Hydracooling guarantees and ensures the independence, impartiality, confidentiality, data protection, secrecy and absence of conflicts of interest of those responsible for managing claims. Each complaint submitted will be assigned a unique code, composed of:

:

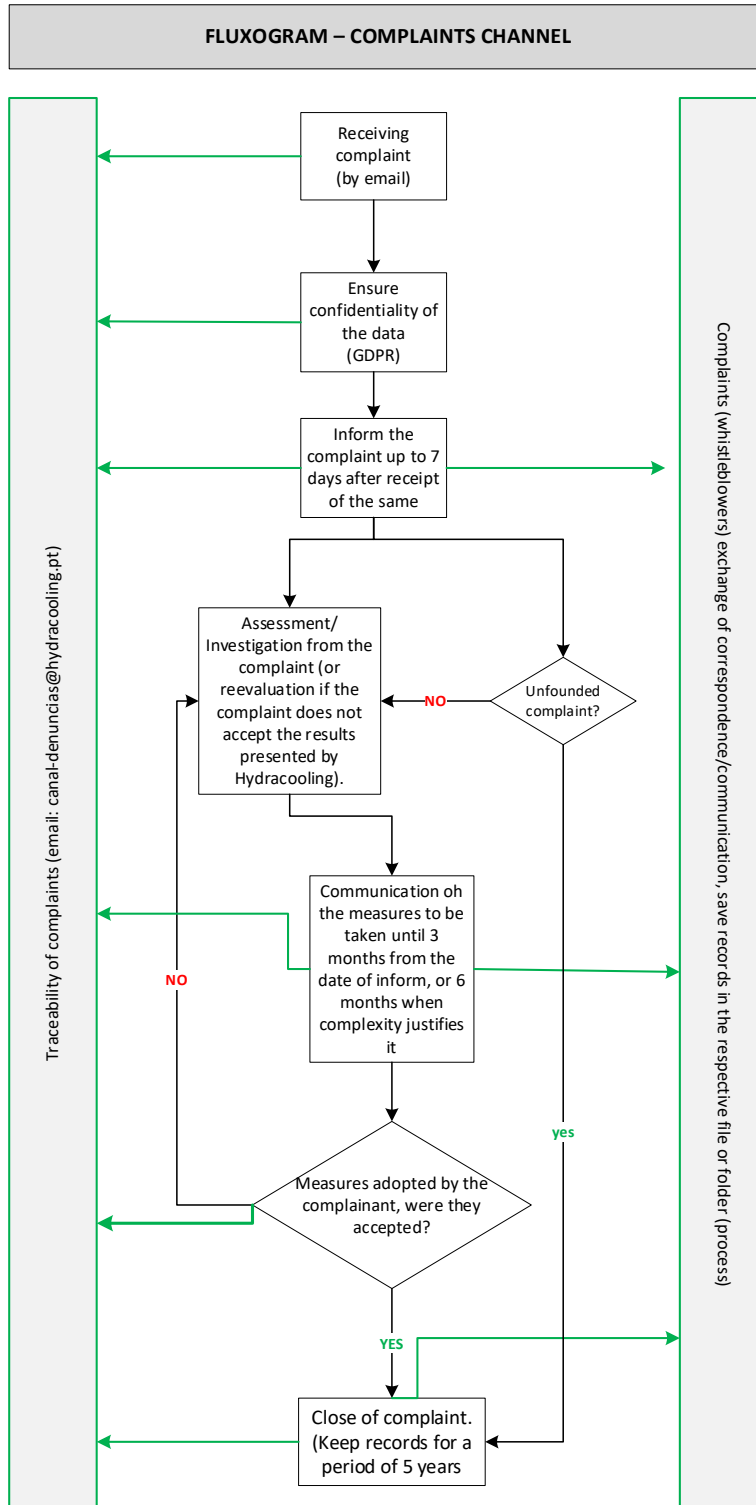
- CD – 2 letters; which represent the acronym “Complaints Channel”;
- Sequential number (up to four digits).
- Ex: **CD – 0001**

for identification and will be duly filed in the Complaints Registry. The team responsible for managing the Whistleblowing Channel will carry out a preliminary analysis of the reported events and the attached evidentiary material and will carry out their legal qualification (if applicable). After the complaint, its qualification and annexes have been submitted, the team will make a decision on each case, which may consist of the opening of an investigation or the preliminary closure of the process, when the complaint is totally unfounded. In any case, the reasons for the decision taken will be recorded in the process. Hydracooling will guarantee respect for the rights recognized by complainants, defendants and third parties who may be involved in the complaint.

5.1 Publication of results of Anonymous Complaints

We also warn you that if you choose to make an anonymous report, you will not be able to provide any information about it later.

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6. ALTERNATIVE REPORTING METHODS

Whistleblowers benefit from the legal protection established in Directive 2019/1937 when they first report information about infringements internally. If the author, after reporting internally, does not receive a response or considers that the matter was not adequately investigated, he or she may choose to report the violation or suspected irregularity to the competent public authority.

7. PROTECTION MEASURES FOR THE WHISTLEBLOWER

Whistleblowers benefit from the legal protection established in Directive (EU) 2019/1937 of the European Parliament, and it is prohibited to carry out acts of retaliation against the whistleblower. An act of retaliation is considered an act or omission that, directly or indirectly, occurred in a professional context and motivated by an internal or external complaint or a public disclosure, causes or may cause the complainant, in an unjustified manner, material or non-material damage.

8. COMPLAINTS OF BAD FAITH

A complaint of bad faith will be considered one in which the person making it is aware of the falsity of the facts narrated, or acts with manifest contempt for the truth. Hydracooling does not tolerate improper or malicious use of the Whistleblowing Channel. Therefore, if it is concluded that there is bad faith in a complaint, the complainant does not benefit from the protection granted by Directive 2019/1937 and is subject to disciplinary measures, in accordance with applicable legislation, or to immediate termination of the contract. concluded between the complainant and Hydracooling, as applicable. Furthermore, a complaint and the corresponding criminal and civil proceedings may be filed against the person of the complainant before the competent authority. This communication to the authority may occur during the investigation phase of the process or once the investigation is completed.

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9. PROTECTION OF PERSONAL DATA

Hydracooling is responsible for the processing of the data processed in the context of the complaints submitted, and uses the information collected only to carry out investigations, make the necessary communications for the progress of the process and comply with legal obligations.

The legal basis that allows Hydracooling to process data and comply with legal obligations. Hydracooling transfers the personal data collected internally, within the scope of its organization, in order to better manage the investigation processes and externally, whenever it considers it necessary, whether for lawyers, regulatory entities, government entities or criminal police forces. The owners can review and update the data provided, guaranteeing the right to confirm the existence of treatments, access to data and rectification of incomplete, inaccurate or outdated data, the right to anonymity, blocking or deletion of unnecessary data, excessive or processed in a manner that does not comply with the provisions of the Law, right to data portability, upon express request, in accordance with the General Data Protection Regulation and national legislation, observing commercial and industrial secrets, right to elimination of personal data processed with the consent of the owner, except in cases provided for by Law, the right to information about the public and private entities with which the person responsible shared the data, the right to information about the possibility of failure to provide consent and on the consequences and the right to revoke consent. The owner also has the right to file a complaint with the CNPD. The data protection officer can be contacted directly by email rh@hydracooling.pt. Complaints and related personal data will be kept for at least 5 years, with the possibility of extending the period in situations defined by law.

10. COMPLAINT CHANNEL

- Suggestions/complaints/reports box (using model: PS04-Mod.012)
- Email: canal.denuncia@hydracooling.pt

11. ASSOCIATED DOCUMENTS

Directive (EU) 2019/1937	European Directive
Law N° 93/2021	Law n. ° 93/2021, of december 20
canal.denuncia@hydracooling.pt	Email
PS04-Mod.012	Suggestions/complaints

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12. VERSION CONTROL

Data	Versão	Conteúdo da Revisão
2022-09-29	00	Initial Writing

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