



INTERNAL INFORMATION SYSTEM POLICY

GDES has created its whistleblower channel, which can be accessed through its website:

<https://gdes.com/uk/>

This Policy sets out the principles by which GDES will treat the Communications received through this channel.

SCOPE OF APPLICATION

This Policy applies to **all members of GDES** including employees, trainees, collaborators, managers and members of the governing body.

PRINCIPLES

TRUTHFULNESS

The Reporter must report **truthful information**

PROHIBITION OF RETALIATION

Retaliation of any kind (unfavourable treatment, disadvantage or other) against the Reporter or related third parties is prohibited

IDENTITY PRESERVATION

The **identity** of the **Reporter** and related third parties will be **kept confidential** and the **confidentiality** of their data will be guaranteed

DEFENCE, PRESUMPTION OF INNOCENCE AND IMPARTIALITY

Any investigation shall guarantee the **privacy, defence** and **presumption of innocence** of the person under investigation and the **impartiality** of the **System Administrator**.

DATA PROTECTION

Data protection regulations will be respected. Only the necessary data will be processed.

Whistleblower and Related Third Party Protection

Conditions

- ◆ **Good faith reporter** (must comply with the principle of truthfulness).
- ◆ Protection will also be given if **public disclosures** of information are made.
- ◆ **Anonymous** reporters who are subsequently identified will also be protected

Related third parties:

- ◆ Assist the reporter in the process.
- ◆ Persons related to the reporter (colleagues or family members).



Exclusions

- ◆ **Information** that has **already** been disclosed.
- ◆ Information on **interpersonal conflicts**.
- ◆ **Public information**.
- ◆ Information on facts that **are not** criminal, serious or very serious administrative or European Union offences.
- ◆ **Untruthful information**.



Rights of the persons concerned

The persons concerned are those identified in the communication as potential offenders.

- ◆ Right to the **presumption of innocence**.
- ◆ Right of **defense**.
- ◆ Right of **access to the proceedings**.
- ◆ **Protection of their identity and confidentiality of facts and data on the procedure**.
- ◆ Compliance with regulatory **time limits**.

USE OF THE GDES CHANNEL

1. Click on the link to the channel published on the website.
2. Once you have accessed, click on "Whistleblower Channel", which will redirect you to the reporting form
3. You must indicate whether your relationship is internal (if you are an employee, manager, former employee) or external (if you are a customer, supplier or other third party).
4. In the drop-down menu with the behaviours to be reported, you must click on the corresponding one.
5. You can file the **report anonymously** (you will receive a URL and code to follow up the communication) or **by identifying yourself** (you must provide your e-mail address to receive notifications).
6. Include as detailed a **description** as possible of the behaviour you want to report
7. If you know, you can indicate the **date on which the events took place**.
8. If there are **witnesses**, you can identify them so that the Ethics and Compliance Committee can contact them.
9. You can **provide documentation** to support the reported conduct.
10. Don't forget to **review** your communication before sending it!
11. You can consult the processing of your personal data in the **privacy policy**, which you will find at the bottom of the form.

Thank you for your cooperation