



Patricia Pilar  
GRUPO

Communication Regulation  
of Infractions

2025

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The Patrícia Pilar Group adopts this Regulation to establish internal rules and procedures for the reception, recording, and handling of internal reports of violations, in compliance with applicable legislation and aligned with the principles of the **Code of Good Conduct for the Prevention and Combating of Workplace Harassment, Code of Conduct for the Prevention of Corruption and Related Offenses, Data Protection Conduct Code – GDPR, and Code of Ethics and Conduct.**

This Regulation ensures the effectiveness, speed, and integrity of the reporting system, guaranteeing confidentiality and protection against retaliation for both whistleblowers and third parties who support them or are linked to the report.

## Article 1 Object

This Regulation establishes the principles, procedures, and mechanisms related to the reporting of violations, in accordance with Law No. 93/2021, of December 20, which transposes Directive (EU) 2019/1937 of the European Parliament and Council, dated October 23, 2019.

It aims to ensure the protection of whistleblowers who, in good faith, report violations of European Union law or specific national regulations.

## Article 2

### Scope of Application

This Regulation applies to all reports of violations that:

- Fall within the scope of European Union law, including rules in areas such as public procurement, financial services, prevention of money laundering and terrorist financing, food safety, personal data protection, among others;
- Constitute offenses related to corruption, fraud, conflicts of interest, or other matters specified in applicable national legislation.
- It applies to employees, service providers, interns, shareholders, members of corporate bodies, and third parties who report violations in a professional context.

## Artigo 3.º

### Internal Reporting Channel

The entity provides a secure and accessible internal reporting channel that ensures the confidential communication of violations.

The channel may be accessed through:

- **Exclusive email address for reports:** [denuncias@patriciapilar.pt](mailto:denuncias@patriciapilar.pt)
- **Phone:** 910 495 366 ou 910 382 048
- **In Person:** Departamento de Ética e Sustentabilidade

Reports may be made anonymously or with identification, in compliance with the applicable law.

To ensure the reporting channel effectively collects relevant information, the following aspects should be described:

1

#### Description of Facts:

Provide a concise and clear description of the matter or situation being reported;

2

#### Timing of Facts:

Indicate whether the facts have occurred, are occurring, or will occur, specifying dates and times, if possible;

3

#### Involved Parties

Identify the individuals involved, including names, roles, or positions, whether suspected or responsible;

4

#### Location:

Inform the department(s) or unit(s) where the facts have occurred, are occurring, or may occur;

5

#### Source of Information:

Explain how the facts came to your knowledge (whether you witnessed them or they were reported to you); if the latter, indicate who provided the information and how they can be contacted;

6

**Other Aware Individuals:**

Identify other individuals who may have knowledge of the facts, specifying their identities, roles, or positions;

7

**Evidence:**

Indicate where documents or other evidence related to the reported facts can be found.

8

**Attachments:**

Provide space for the whistleblower to attach files with evidence or indications related to the reported facts.

## Article 4

### Processing of Reports

All received reports will be reviewed by a designated team, ensuring impartiality, confidentiality, and the protection of the whistleblower's data.

A secure and documented record of all reports will be maintained to:

- Acknowledge receipt of the report within 7 business days;
- Evaluate the report within a maximum of 3 months from its receipt;
- Communicate follow-up actions to the whistleblower, if applicable.

## Article 5

### Whistleblower Protection Guarantees

Any form of retaliation, direct or indirect, against the whistleblower is expressly prohibited. This includes dismissal, suspension, demotion, discrimination, or equivalent measures.

The confidentiality of the whistleblower's identity will be guaranteed, except in cases where disclosure is required to comply with legal obligations or judicial decisions.

The whistleblower will have access to support and protection measures provided under applicable legislation, including legal assistance and compensation for damages, if necessary.



## Article 6

### External Reporting Channel

If the whistleblower chooses not to use the internal reporting channel or in situations where it is deemed unsuitable, they may resort to external reporting channels provided by competent authorities, such as the Inspectorate-General of Finance, Public Prosecutor's Office, ASAE - Food and Economic Safety Authority, ACT - Authority for Working Conditions, or other legally designated entities.

The whistleblower may also report directly to European Union institutions when appropriate.

## Article 7

### Entity Responsibilities

The entity is committed to:

- a)** Widely disseminating this Regulation and the means of accessing the reporting channel;
- b)** Conducting awareness and training initiatives on whistleblower protection;
- c)** Monitoring and periodically evaluating the effectiveness of the reporting system.

## Article 8

### Final Provisions

This Regulation comes into force on the date of its approval by the Administration.

The Patricia Pilar Group ensures the dissemination of this document through various channels to guarantee accessibility and promote understanding. The methods of dissemination include:

#### Company Website

The Code is published on the official company website at ***www.patriciapilar.pt***, easily accessible to all employees and stakeholders;

#### Internal Channels

The Code is also communicated through internal channels to reach all employees and ensure access to the information;

#### Printed Format

A printed version of the Code is available so that everyone, including employees without online access, can consult it with ease;

#### Actions

Through training actions aimed at disseminating and ensuring knowledge acquisition and individual commitment by employees.

This Regulation comes into force on the date of its approval by the Administration.

Approved on: 31 / 12 / 2024



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