

-CODE OF ETHICS-

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1.0 Scope

The Code of Ethics aims at defining the ethical principles promoted by all companies of Dumarey Group located in Piedmont territory (defined as “Dumarey” or “Companies”) and to direct and support employees, collaborators and any third party who interact with Dumarey in choosing the behaviour to adopt and the actions to take.

With the adoption of the Code of Ethics, Dumarey commits to guarantee a work environment based on group values such as integrity, excellence, creativity, entrepreneurship, and partnership, which is expressed through mutual respect, trust, transparency, both in behaviour and in daily decisions. Dumarey is also committed to respect and share, through the sustainability report, the three ESG (Environment, Social, Governance) criteria established in 2005 by the UN, which all employees are required to pursue. Dumarey considers the Social aspect extremely relevant, especially concerning diversity and inclusion: innovative ideas can arise from the comparison and the diversity.

The rules of conduct set out in the Code of Ethics are aimed at supporting sustainable growth and protecting the corporate reputation. Compliance with these rules has also the purpose to prevent the crimes described in the Organizational Model of each Company as per Legislative Decree 231/01 and subsequent amendments ("Organizational Model").

2.0 Area of Application

The Code of Ethics applies to all directors, managers, employees, interns (collectively referred to as "Employees") as well as temporary workers, consultants, customers, suppliers and to all third parties who operate and work on behalf of all companies of Dumarey Group located in Piedmont territory (collectively referred to as "Third Parties"). All the subjects mentioned in paragraph 2.0 will be collectively identified below as "Recipients".

Employees in charge of supervising the activities carried out by Third Parties operating on site must ensure that they comply with the applicable provisions of the Code of Ethics.

Joint Ventures are excluded from the field of application of the current procedure.

3.0 Rules of conduct

Code of Ethics main key principles, among others, are:

- compliance with the laws and corporate directives;
- conflicts of interest prevention;
- fairness in relations with customers, suppliers and institutions;
- the accuracy and transparency of accounting records;
- the respect of human rights;
- the respect of health & safety and environment regulations.

3.1 Compliance with Law requirements and company procedures

Recipient shall be responsible for his/her own actions and respect the legislative obligations, as well as all the corporate procedures and directives adopted by Dumarey, including this Code of Ethics.

For any doubts regarding the interpretation of the laws and/or Company internal regulations, it is possible to contact the Legal & Compliance Department of Dumarey Automotive Italia S.p.A..

3.2 Bedtowel/acceptance of presents or other amenities

Dumarey does not tolerate any form of corruption, it undertakes to comply with the anti-corruption laws in force in all the countries in which it operates and requires all Recipients to act with honesty and integrity at all times.

No direct or indirect offer or donation of money, gifts or benefits of any kind to customers, suppliers, external consultants is permitted, with the aim of influencing them in the performance of their duties and/or gaining undue advantage, or which may also only be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring favorable treatment in the conduct of any activity connected to the Companies. In any case, the offers, donations, gifts or benefits above mentioned are not permitted whether they can compromise the integrity or reputation of one of the parties or if they could be interpreted, by an impartial observer, as aimed at acquiring undue and / or improper advantages.

Acts of mere courtesy and/or gifts are permitted as long as they are of modest value, in any case not exceeding 50 euros per external company, while commercial business dinners and lunches cannot be offered or accepted if they exceed 50 euros per person.

Dumarey employees commit not to accept gifts, except in exceptional situations and in any case for a value not exceeding 50 euros.

3.3 Relationship with Public Administration

All relations with the Public Administration must be characterized by strict observance of the principles of legality and transparency and must be managed exclusively by the company functions expressly delegated and authorized for this purpose. It is forbidden to make any type of payment, offer or receive any value benefit in the context of relations with the Public Administration for the purpose of obtaining or maintaining an assignment or any other commercial advantage in favor of Dumarey.

3.4 Conflict of interests

Some personal situations of the Recipients may be in conflict with the duties and responsibilities towards Dumarey and could also cause reputational damage for the Companies. It is necessary for each Employee to report any conflicts of interest to their supervisor and for each Third Party to their Dumarey reference contact, according to transparency principle, in order to be able to determine whether it is a situation that could in any way influence Dumarey decisions. Sometimes, even the mere suspicion of a conflict of interest can have a negative impact on a business organization and cause serious reputational damage.

In general, a potential conflict of interest falls into one of the following categories: financial (e.g. financial interest in a supplier or customer of Dumarey), professional (e.g. hiring a family member at Dumarey), sentimental (e.g. a personal relationship with a subordinate or superior), fraudulent use of company property (e.g. use of a Dumarey asset to obtain a personal benefit).

In the event that there is a sentimental relationship, kinship or friendship with a supplier, the fact must also be reported to the procurement manager of the tender or to the Supplier Supervisor of reference, in order to avoid influences in the negotiations.

3.5 Regulation of anti-money laundering

Money laundering is the introduction into the standard market cycle of funds deriving from criminal activities such as drug or weapon trafficking, extortion or tax evasion.

Dumarey carries out its business in full compliance with both national and international laws on organized crime and anti-money laundering, in any competent jurisdiction.

Recipients must never carry out or be involved in activities that imply the laundering, use or self-laundering of proceeds from criminal activities, strictly observing the anti-money laundering laws. Dumarey is required to verify in advance the available information (including financial information) on commercial counterparts, consultants and suppliers, in order to ascertain their moral integrity, respectability and the legitimacy of their activity before establishing commercial relationships with them. In case of suspected money laundering, the Recipients have to promptly consult Legal & Compliance Department of Dumarey Automotive Italia S.p.A..

It is highly important not to accept company partners' payments from bank accounts different from the official ones and not to make business with partners whose company or ownership structure is not clear, controlled and well detailed.

3.6 Finance and internal controlling

All documentation relating to the Companies' activity (including expense reports, financial statements, service documents, operational and production reports, reports for auditors and public bodies), must be complete, accurate and reliable by law. Dumarey guarantees compliance with all applicable regulations regarding the drafting of financial statements and mandatory administrative-accounting documentation, as well as fiscal compliance according to the most recent fiscal regulations.

For each accounting entry that reflects a corporate transaction, adequate supporting documentation must be kept, which makes it possible to identify the reason for the transaction and the relative authorization and which can be easily consulted by external or internal entities authorized to control. All financial transactions must be authorized by the relevant manager, in accordance with internal control procedures. Recipients are required to collaborate to correctly and timely account each entry related to management activity and promptly report both the existence of errors or omissions in the accounting recognition entry process, and behaviours not in line with the provisions of this paragraph.

3.7 Cooperation with authorities

When the authorities carry out investigations at Dumarey or at third parties working for Dumarey, impartial cooperation with the investigating authorities is an absolute priority in order to clarify and resolve any suspicious circumstances as quickly as possible.

Whether the Recipients are contacted by an investigative officer during an audit or investigation, they are required to collaborate openly and immediately with these officers, making sure they fully understand the instructions provided. It is necessary to verify in advance with the departments concerned that the information to be provided to the officers is accurate and truthful.

4.0 Information Security and safeguard of company assets

Dumarey recognizes the value of its own and third party intellectual property rights, corporate assets, corporate and personal data and guarantees their maximum protection.

4.1 Confidential data protection and use

The data concerning Dumarey, its customers, its suppliers, its Employees are to be considered Companies' assets and must be used appropriately in compliance with the rules for the protection of intellectual property and personal data protection laws.

Employees and all those who have access to Dumarey data are responsible for their integrity, availability and confidentiality and must comply with Dumarey procedures, in particular the "Company regulation on the use of IT tools", which defines the rules for the correct use of IT tools provided by the Companies. Dumarey's obligation to protect data does not end with the conclusion of the employment contract or with the termination of the service contract at Dumarey. It is necessary that all Dumarey information held by a Recipient who has worked at Dumarey remains in the Company. In the same way, it is forbidden to bring into Dumarey data belonging to companies for which you have previously worked, unless there is a written agreement with the company itself.

It is also forbidden to falsify or tamper with any corporate documentation, whether financial or technical. All Companies' records must be maintained accurately.

All corporate documentation must be drawn up and archived in compliance with legal and tax requirements, respecting the retention times established by law and/or company provisions. At the end

of the retention period, there is an obligation to cancel or destroy documentation. Failure to comply with this process may expose Dumarey to serious liability under the law.

It is illegal to destroy, conceal, alter or falsify any Dumarey document or other records, documentation or data for the purpose of obstructing or influencing a legal proceeding or judicial investigation.

4.2 Personal data protection and use

Dumarey recognizes the great importance of protecting and safeguarding Employees and Third Parties' personal data processed by the Company, in compliance with current legislation on the protection of personal data, ensuring that their confidentiality, availability and integrity are granted.

Personal data are any information relating to an identified or identifiable natural person, e.g. name, surname and date of birth, residential address and email address, bank account number and credit card number, vehicle number plate, information on health or on political or religious orientation.

All those who, in relation to their assigned tasks, process personal data, must comply with the instructions given by Dumarey in the "Instructions for those authorized to process personal data" pursuant to art. 29 of the European Regulation 679/2016.

4.3 Intellectual Property

The protection of Dumarey patents, copyrights and know-how is an essential element for the success of the Companies. Recipients are required to actively contribute to safeguarding the Companies' intellectual property and to report any suspected violations.

Indeed, the violation of intellectual property rights can lead to serious risks for Dumarey and can lead to consequences in the field of civil, criminal and labor law for the Employees involved, as well as, in the event of violations by Third Parties, the resolution of the service contract.

Dumarey respects the intellectual property rights of its competitors, commercial partners or third parties and uses the know-how of the latter in compliance with the law and any confidentiality agreements; third-party software is used by Dumarey only within the scope of the rights granted.

4.4 Information Security and cybersecurity

Information is a key factor in being successful in the marketplace and, therefore, is a valuable resource that must be protected from misuse, loss, destruction or illegal use.

Information security, which largely passes through cybersecurity, is essential for the activities of Dumarey. Therefore, the Companies treat information security as an essential element for data, systems and networks protection. The Companies comply with the requirements of the main international and sector standards, in order to protect the IT infrastructure from risks that can have an impact on the confidentiality, integrity and availability of data.

So, Recipients must comply with all the specific rules established by Dumarey and be attentive to cybersecurity issues. In the case of collaborations or projects managed by customers, it is necessary to ascertain the compliance of the methods and procedures developed by Third Parties with the Dumarey IT function to verify the technical compliance with the Companies' standards.

4.5 Use of company assets

All Employees or those who are assignees of a company assets (computers, mobile phones, company cars, etc.) for work reasons must keep them carefully and use them in accordance with the requirements listed in Dumarey company procedures and in compliance with the legislation in force.

4.6 Management of disputes

The management of potential or current legal issues and/or disputes that involve Dumarey, including the need to make use of external lawyers to request opinions, must take place solely through the Legal & Compliance Department of Dumarey Automotive Italia S.p.A..

It is mandatory to immediately forward any oral or written requests to the Legal & Compliance Department of Dumarey Automotive Italia S.p.A. related to: formal notices, subpoenas, notices to appear, investigations, inquiries or other communications received from courts, enforcers, law enforcement agencies, government agencies or law firms.

The same rules apply whether Dumarey is directly involved, through an investigation or a lawsuit concerning a Dumarey product or a Dumarey site, or in cases where Dumarey is indirectly involved, such as in the case of investigations against suppliers, customers or competitors

4.7 Social Media usage rules and relationship with Press

Each Employee represents Dumarey, is its interface worldwide and what each Employee publishes on a Social Media is reflected on Dumarey and its brand, either a personal post or a post published as an authorized person by Dumarey.

The regulation of the use of Social Media such as, by way of example, Facebook, LinkedIn and Yammer, is contained in the "How to use Social Media" Procedure which must be respected.

Communications of Dumarey Automotive Italia S.p.A. is the function responsible for communications between Dumarey and press/media regarding all Companies' activities. No one is authorized to report on Dumarey activities with any journalist or press office, unless expressly authorized by the Communications function or by the Management. If you are contacted by a media, you are prohibited from answering any questions or making statements that could be used against Dumarey.

It is necessary to address journalists and the press office to the Communications function and immediately report the incident to the manager and the Legal & Compliance Department of Dumarey Automotive Italia S.p.A..

5.0 Relationship in the market

Dumarey undertakes to act in compliance with the principles of fair competition and the rules relating to import and export and to carefully select business partners and suppliers. In case of doubts or if you need information regarding the behavior to adopt to comply with these obligations, you can contact the Legal & Compliance Department of Dumarey Automotive Italia S.p.A..

5.1 Free competition

Dumarey respects the rules of fair competition and acts in compliance with the antitrust laws applicable in the countries in which it operates. Territorial or customer divisions between competitors, agreements or exchanges of information on prices, commercial conditions and/or relations with suppliers are prohibited. Dumarey does not abuse of its position on the market, for example by imposing price discrimination or the obligation to purchase other related products. The prohibitions described concern not only written agreements, but also verbal agreements or tacit behavior.

Particular attention must also be paid to the collection of information on competitors, which must only take place through public channels or other lawful channels.

Membership of associations and organizations in which Dumarey's competitors are also represented may constitute a greater risk in terms of antitrust. Employees who receive information from such associations or organizations should check whether it is confidential from a competitive market point of view. Before taking part in association meetings that include competitors, it is necessary that all participants agree on a clear and detailed agenda in writing. At the end of each meeting, minutes must be drawn up and shared with all participants. In case of doubts or in the event that a topic of discussion could harm the principle of fair competition, it is necessary to contact the Legal & Compliance Department of Dumarey Automotive Italia S.p.A.. If competitive information is exchanged during the meeting, the Employee must object, ensuring that his/her objection is recorded in the minutes and immediately contact the Legal & Compliance Department of Dumarey Automotive Italia S.p.A..

Violations of the antitrust law can lead to serious consequences for the Companies and for the Employees involved, such as economic sanctions, exclusion from participation in public tenders, requests for compensation for damages, damage to reputation and criminal penalties.

5.2 Import/export

Dumarey undertakes to comply with all applicable regulations regarding the import and export of products, services and information in the countries in which it operates.

Export control regulations apply to goods as well as technologies and software, for example in case of temporary cross-border transfers of objects or technical drawings during a business trip or data transmission via e-mail or cloud

5.3 Relationship with commercial partners and suppliers

Dumarey keeps commercial relations only with respectable and law-abiding subjects and protects the interests of its customers through a careful selection of suppliers and other commercial partners based on competition, comparing price, quality, performance and adequacy of the products or services offered, as well as sustainability. In particular, the Third Parties undertake to comply with the standards of behaviour defined in this Code of Ethics.

6.0 Respect for human rights

The corporate culture of Dumarey is based on the respect for human rights, with fair working conditions for all Employees and those who work with and for the Company, as well as compliance with labor standards, with the Universal Declaration of human rights and the European Convention, as well as with the Guiding Principles of the United Nations. Dumarey also expects suppliers, customers and business partners to share this commitment to human rights safeguarding.

6.1 Communications, respect and inclusion

Dumarey promotes communication and loyal collaboration among management, employees and employees' Union representatives and protects the fundamental rights of its personnel.

The principles of equal opportunities and equal treatment are guaranteed regardless of skin colour, ethnic or social origin, religious affiliation, age, disability, gender identity, cultural perspective, political and/or philosophical views or gender diversity. In compliance with labor law, discrimination based on these characteristics, sexual harassment, or forms of inappropriate behaviour towards individuals or groups will not be tolerated.

In addition, Dumarey prohibits bad language and verbal harassment towards anybody.

6.2 Prohibition to exploit child labour

Dumarey opposes and prohibits all forms of child labor exploitation, in compliance with the provisions of the United Nations Convention on the Rights of the Child and all applicable national and international laws.

Dumarey, in compliance with current laws, keeps, within the HR department of Dumarey Automotive Italia S.p.A., a personnel register which indicates the date of birth of each worker.

The minimum age for admission to work cannot be lower than the age at which compulsory education ends, without prejudice to rules more favorable to minors. Minors admitted to work must benefit from working conditions appropriate to their age and be protected against economic exploitation or against any work which could undermine their safety, health, physical, mental, moral or social development or which could endanger their education.

In Dumarey, the only activities allowed to minors are those envisaged by the school-work alternation, which cannot be considered a work activity but is an innovative learning methodology established by Law no. 53/2003 and governed by Legislative Decree no. 77/2005.

In contracts with customers and suppliers, Dumarey prepares suitable clauses aimed at contrasting any employment relationships with minors and contrasting any form of child exploitation. Dumarey, therefore, commits to terminate the existing contracts, in case of detection or awareness of some form of child exploitation.

6.3 Contractual provisions of the employment relationship and prohibition of Forced Labour

Dumarey Employees are hired according to the National Collective Labour Agreement for the metalworking sector for male and female workers employed in the private metalworking industry and the installation of plants as well as the National Collective Labour Agreement for Industry Managers, complying with all the requirements contained therein, including requirements relating to salary, working hours, bonuses and benefits, where applicable.

Dumarey does not rely on or support the use of forced or compulsory labour or any form of coercion towards personnel, does not keep original identity documents and does not require personnel to pay "deposits" at the start of the employment relationship nor does it charge employees any hiring-related fees or commissions. Under no circumstances Dumarey withholds part of the salary, salary allowances, employees' properties in order to oblige them to continue working for the organization.

Dumarey places no obligation on Employees in relation to the extension of normal working hours. Any overtime hours must be agreed and approved by the Employee's supervisor.

Employees are free to form trade union associations, to join them and to carry out trade union activities, as well as to participate in collective strikes, without retaliation of any kind from the Companies, as per art. 39 of the Italian Constitution and the CCNL.

Employees are free to terminate the employment relationship, according to Law and contractual obligations.

No third party company that supplies manpower or engineering services or goods to the Companies themselves or to which the Companies supply goods or services uses or encourages forced labour.

7.0 Workplace safety, health, product safety and environment

Dumarey undertakes to guarantee the safety and health of people, as well as the safety and quality of its products and to act in compliance with environment protection legislation and with all current environmental and sustainability regulations.

7.1 Health and safety

Dumarey guarantees a safe working environment for all Recipients, in compliance with the requirements of Legislative Decree 81/08 and subsequent amendments. Companies base their decisions regarding Occupational Health and Safety on the contents of the Risk Assessment Document which provides for the identification of the hazards present, the risk assessment, the implementation of safety measures aimed at their elimination or mitigation and the definition of improvement actions. The risk mitigation approach is based on the hierarchy of controls (elimination, replacement, engineering interventions, administrative and procedural interventions, PPE) as well as on the sharing of "lessons learned" deriving from past incidents. This method makes it possible to provide suitable and effective information and training to Employees who have to perform certain activities.

Furthermore, Employees' jobs and tasks must be subject to the assessment of the Occupational Health Physician who ascertains the suitability for carrying out the specific task and determines any limitations and/or prescriptions.

It is very important that each Recipient feels responsible for their own and their colleagues' safety, communicating any situation seemed to be at risk.

7.2 Product safety and quality

Together with occupational safety and also in compliance with standards and legislative requirements, Dumarey guarantees high quality and safety standards related to the product made, in order to retain customers and be competitive on the market. Each Recipient is responsible for ensuring product safety and reliability. It is very important to identify, communicate and report all potential product safety and quality problems to product managers.

By reporting these non-conformities, the managers of reference will be able to investigate, understanding where the problem arose and taking the necessary protective measures

7.3 Environmental protection and energy efficiency

Dumarey is responsible to act in compliance with the environmental legislation in force as well as with the applicable procedures in force in site aimed at protecting the territory and the environment, which may be more stringent than law provisions. Each Employee is committed to comply with both national law and company standards about environmental matters.

In addition, Dumarey promotes the adoption of more and more energy-efficient tools, processes and behaviours, as well as environmental sustainability, in compliance with national legislative requirements. Dumarey intends to make a significant contribution to the reduction of environmental impacts along the entire value chain and actively promote climate protection.

The principles of environmental protection that Dumarey follows are the following ones:

- To be engaged in actions that protect the environment, also using renewable energies.
- To be committed to reducing waste and atmospheric pollutants.
- To be committed to sustainable resource management, such as not wasting water and energy resources, as well as recycling materials throughout the production cycle and product life cycle.
- To keep involving Employees actively in the protection and conservation of the environment.
- To develop and implement technologies aimed at minimizing polluting emissions as well as minimizing Companies' carbon footprint.
- To carry out periodic checks aimed at assessing the environmental impact of the site, both in terms of noise and polluting emissions, with a view to continuous improvement.

7.4 DGT (Dangerous Good Transportation) Regulation

The Companies and the Recipients are committed to act in compliance with the DGT (dangerous goods transportation) regulation, as well as with the company procedures for receiving, delivering, transporting - by land, sea, air, train - and handling hazardous materials. Such materials include parts, machinery, equipment, vehicles, hardware parts, prototypes, advanced technologies, as well as chemicals and waste. Even commonly used materials with which you come into contact every day may be subject to DGT regulations if they are transported by vehicle nearby or shipped by ship or plane overseas. Within Dumarey, a person in charge has been identified as DGT Manager. For all information, contact the ENV / H&S department of Dumarey Automotive Italia S.p.A..

Regulatory compliance in matter of environment is listed in the Organizational Model, Special Part H.

8.0 Reporting

Each Recipient must report any doubts or suspicions regarding a non-compliance with legislation or company provisions, including this Code of Ethics, of which they become aware, like, by way of example, fraud, theft, violence in the workplace, discrimination, sexual harassment, abuse or misuse of company resources, conflict of interest, illegal transfer of information, false invoicing, lack of control or bid rigging as well as all other behaviors that constitute unlawful act or do not comply with company ethics.

Early detection and reporting of a violation allow the Companies to react quickly and take immediate action to prevent any damage.

Dumarey has set up the Whistleblowing procedure that includes the following internal reporting channels:

- a paper mailbox, located next to the Unions's board on the first floor of Dumarey Automotive Italia S.p.A., equipped with a locked lock;
- a digital platform in cloud compliant with the requirements listed in Legislative Decree 2023/24, accessible towards the following link [dumarey | Home \(integrityline.com\)](https://dumarey.com/integrityline.com);
- the direct contact, by phone or in person, with the Internal Auditor of Dumarey Automotive Italia S.p.A..

All reports will be managed by an internal Dumarey Ethical Committee.

Reports can exceptionally be anonymous, even if Dumarey prefers and encourages the identified ones by a name, granting the confidentiality and protection of the whistleblower in good faith from any retaliation, as better specified in chapter 7 of the General Part of the Organizational Model. The notice about the processing of personal data collected through the reports is included in the Attachment 1 of the Whistleblowing procedure.

If a whistleblower has been subjected to or witnesses retaliation, he/she must immediately notify HR or the Legal & Compliance Department of Dumarey Automotive Italia S.p.A.. Dumarey condemns any form of retaliation against individuals who report a potential violation. On the other hand, reports must not be false or contain unfounded allegations. Any information transmitted must be in good faith.

9.0 Penalties

Employees who violate the Code of Ethics are subject to disciplinary sanctions pursuant to art. 7 of the Workers' Statute and the company Disciplinary Code. These disciplinary sanctions will be proportionate to the type and extent of the violation and may also consist of dismissal, based on the applicable legislation and the collective agreement of reference.

Failure to comply with the Code of Ethics by Third Parties may result in the termination of the existing contract, having assessed the seriousness of the alleged violation.

10.0 Revision History

Rev0 March 1st 2023 → template issued

Rev1 June 28th 2023:

- update par. 6.3 title change in “Contractual provisions of the employment relationship and prohibition of Forced Labour” introducing the compliance with applicable National Labour Contracts and the right of association to Unions.
- update par. 6.5 explaining the concepts of energy efficiency, renewable energies and sustainable resources management.

Rev2 22/02/2024 :

- update of the whole document from PUNCH Torino to Dumarey, creating a sole Code of Ethics valid for the whole Dumarey companies in Piedmont
- update par. 1.0 Scope underlining the importance of the Social aspect in the Company.
- change of paragraph numbering because of paragraph move into chapter 6.0
- update par. 3.5 Regulation of anti-money laundering introducing the definition of laundering and the ways of reporting.
- update par. 3.6 Finance and internal controlling inserting fiscal compliance
- addition of par. 3.7 Cooperation with authorities
- update par. 4.2 Personal data protection and use with the definition of personal data
- addition of par. 4.4 Information Security and cybersecurity

- change of the following paragraph numbering
- update par. 5.1 Free competition inserting the concept of antitrust
- addition of chapter 6.0 Respect for human rights, moving paragraphs 3.2, 6.2 and 6.3 in this chapter
- change of the following paragraph numbering
- update par. 7.3 Environmental Protection and energy efficiency introducing some concepts linked to environmental sustainability
- update par. 8.0 Reporting, based on Whistleblowing procedure contents issued in July 2023
- removed the Att. 1 “Privacy Notice Whistleblowing” because attached in Whistleblowing procedure

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