

Whistleblower Protection Policy

Metalúrgica Progresso de Vale de Cambra, S.A., is committed to ensuring the protection of people that wish to report, internally, a violation or a possible irregularity, according to the General Regulation for the Protection of Persons Who Report Infractions (Law Nr. 93/2021, December 20th) and to the General Regulation for the Prevention of Corruption and Related Infractions (Decree-Law Nr. 109-E/2021, December 8th). Metalúrgica Progresso de Vale de Cambra, S.A., prohibits retaliation against any person that, given reasonable motive to believe that a violation or suspected irregularity is taking place, reports it and supplies information obtained in a professional setting.

This Whistleblower Protection Policy applies to Metalúrgica Progresso de Vale de Cambra, S.A., located at Rua Arlindo Soares de Pinho, 143, 3730-404 Vale de Cambra (Portugal).

1. WHICH ISSUES SHOULD BE REPORTED?

Whistleblowers can report information, obtained in a professional setting, regarding suspected irregularities or violations - actual or potential - of:

- Applicable laws, namely the ones that prevent crimes of corruption, undue receiving or offering of advantages, embezzlement, economic participation on a deal, soliciting bribes, abuse of power, malfeasance and influence peddling;
 - The internal control and auditing policies;
 - The information disclosure policies, to clients and suppliers;
 - Situations that compromise the safety of people and materials;
 - Situations that compromise the functioning of the organization.
- Non-ethical behaviours;
- The favouring of clients, visitors, workers, suppliers, or partners not justified by the commercial practices established by Metalúrgica Progresso de Vale de Cambra, S.A.;
- The norms applicable to Metalúrgica Progresso de Vale de Cambra, S.A.;



- Reprisals due to reporting or participating in an investigation.

The violation or suspected irregularity must be based on reasonable grounds. This means that the whistleblower doesn't need to prove the violation or irregularity, but they must be capable of proving their suspicions based in observations, documents, e-mails, reports, or photos. A rumour isn't reason enough, nor is it reasonable, to make a report.

2. WHO CAN REPORT A SITUATION?

All workers that work, or have worked, for Metalúrgica Progresso de Vale de Cambra, S.A., can report information, including temporary workers, independent workers, interns, volunteers, or candidates in training.

3. HOW TO REPORT?

Violations or suspected irregularities can be reported by filling out a form at www.progresso.pt/politica-protecao.php.

During the report, the author can choose to remain anonymous, or give permission to reveal their identity, but they should always provide all necessary information so that the situation can be adequately investigated, and so that the consequences of the report can be communicated to them. Reports without proper basis, unreasonable, or lacking factual information will not be investigated.

After the report, the author will receive, within the next 7 days, a report receipt.

Metalúrgica Progresso de Vale de Cambra, S.A., will manage the reports confidentially and may, if it is deemed appropriate and necessary, communicate the violation or suspected irregularity to third parties, including regulatory, governmental, or law enforcement agencies.

No later than 12 weeks after the report, the author will be informed about the process and they should maintain confidentiality regarding all information received.

All whistleblowers that feel that they have been subjected to reprisals after reporting a possible violation or suspected irregularity shall immediately contact Human Resources.

4. ALTERNATIVE REPORT METHODS

All whistleblowers benefit from legal protection following Directive 2019/1937 if they first report the information regarding the violation internally. If the author, after the internal report, doesn't receive any reply, or if they consider that the matter wasn't properly investigated, they may opt to report the violation or suspected irregularity to the relevant public authority.

PERSONAL DATA PROTECTION

Metalúrgica Progresso de Vale de Cambra, S.A., responsible for the data, uses all information gathered to carry out inquiries, to perform all communications necessary to advance the process and for the fulfilment of legal obligations. The legal basis that allows Metalúrgica Progresso de Vale de Cambra, S.A., to treat the data are the consent of the author of the report and the fulfilment of legal obligations.

Metalúrgica Progresso de Vale de Cambra, S.A., transfers, internally and internationally, all personal data collected, within the scope of the organization, so that it can better manage any processes deemed necessary. Metalúrgica Progresso de Vale de Cambra, S.A., took all appropriate safeguards regarding the international transmission of personal data through a legal procedure known as "standard data protection clauses", which is recommended and adopted by the European Union and by the National Data Protection Authority of Brazil.

The holders may review, update and decide which kind of data they wish to have saved, always preserving the right to confirm the existence of processing, to access the data and to correct incomplete, inaccurate, or outdated data, the right to remain anonymous, to block, or eliminate data that are unnecessary, excessive, or that haven't been treated in accordance to the Law, the right of data portability to another product or service supplier, through express requirement, according to the regulations of the national authority, observing industrial and commercial secrecy, the right to the elimination of personal data treated with the consent of the holder, except in the cases stipulated by Law, the right of access to information of public and private entities with which the controller has shared use of the data, the right to access information about the possibility of not giving consent and about the consequences and the right to revoke consent.

The Data Protection Officer may be reached directly through email geral@progresso.pt and you may request, at any time, the exercise of applicable rights.



The personal data of the whistleblower are kept until the end of their intended purpose and they will be terminated, at most, 2 years after the end of such process.

VALIDITY AND COMMUNICATION

This policy will come into effect on December 2nd, 2025, when it was approved by the Board of Directors of Metalúrgica Progresso de Vale de Cambra, SA, it is valid for 3 years, and it may be subjected to interim review, if needed.

The Company will take steps to ensure that all contributors, as well as all other intended recipients, are aware and understand the scope of this Policy, either through internal communication, or through the company's website.

Vale de Cambra, December 2nd, 2025

The Board of Directors



ANEXO

Formulário

FAÇA A SUA DENÚNCIA

Nome	
Email	Telefone
Colaborador	Outra
Informações a denunciar	
ENVIAR	

