

# HCLTech Whistleblower Policy Global

## Objective

The principles of Trust through Transparency and Accountability are at the core of the existence of HCL Technologies Limited and its subsidiaries worldwide (hereinafter known as the "Company"). To ensure strict compliance with ethical and legal standards across the Company, the present policy has been created.

The objectives of this Policy are:

- To create a window for any person who observes or knows of any unethical behavior, actual or suspected fraud, or violation of a law, the Company's Code of Business Ethics and Conduct ("Code") or breach of any other Company policies or to report breach of Company's Code of Conduct for Prevention of Insider Trading (including any incident of leak or suspected leak of unpublished price sensitive information. (hereinafter, collectively the "Unethical and Improper Practices"), either organizationally or individually to be able to raise it;
- To encourage timely, safe and open reporting of alleged wrong doings, potential illegal activity or suspected impropriety;
- To ensure consistent and timely institutional response;
- To ensure appropriate reporting of Unethical and Improper Practices ([whistleblower@hcl.com](mailto:whistleblower@hcl.com));
- To encourage ethical and lawful conduct; and
- To provide adequate safeguards against victimization or retaliation of persons.

**Note:** Employees are advised to refer to the country specific addendums for Romania, Hungary and Bulgaria in addition to the Whistle Blower Policy – Global (available in later in the policy under "Company Specific Addendums" Sections). The addendums implement certain country specific legal requirements in addition to those under the Whistle Blower Policy – Global. Also note that in the event of conflict or inconsistency between the Whistle Blower Policy – Global and the country specific addendum, the addendums shall prevail."

## Scope

This Policy defines and lays down the process for raising a Complaint, the safeguards in place for the person raising a Complaint, **the roles and responsibilities of all stakeholders**, and **sets the timelines** for processes to be followed. In all instances, the Company retains the prerogative to determine when circumstances warrant an investigation and the appropriate investigative process to be employed, in conformity with this Policy and applicable laws and regulations.

Complaints related only to Unethical and Improper Practices will be dealt by this Policy. Any Complaints related to HR issues will be forwarded to [hear@hcl.com](mailto:hear@hcl.com) and issues related to sexual harassment will be forwarded to [Secure@hcl.com](mailto:Secure@hcl.com). An illustrative list of Complaints redressed by this Policy is provided in **Annexure 1**.

## Applicability

This Policy covers all directors, officers, employees, third party vendors, consultants and customers throughout the world, operating out of any location of the Company.

## Definitions

- **Whistleblower ("WSB"):** A person or entity making a disclosure of any actual or suspected Unethical and Improper Practice that they have observed or have knowledge. Whistleblowers could be directors, employees, contractors, contractor's employees, clients, vendors, internal or external auditors, law enforcement/regulatory agencies, or other third parties.
- **Ethics Committee ("EC"):** The Ethics Committee shall be comprised of at least four members, which shall include (i) the Head of Ethics Committee; (ii) one (1) member from Finance; (iii) one (1) member from Legal; and (iv) one (1) member from HR. The General Counsel is Head of Ethics Committee and including him current EC constitution comprises of six (6) members, others being two (2) from Finance; two (2) from Legal and one (1) from HR. EC may choose to appoint any additional member, if required.
- **Complaint:** The reporting of any Unethical and Improper Practice to the EC made in good faith by a Whistleblower.
- **Ombudsperson or Ombudsperson Function ("OF"):** Any external agency / individual appointed to independently carry out preliminary investigation of the Complaint lodged by a Whistleblower.

- **Secretary:** Any member of the EC or any other person as may be appointed by the EC to act as the Secretary of the EC. He/ she shall keep minutes of meeting of the EC.
- **Audit Committee ("AC"):** The Audit Committee of HCL Technologies Limited as constituted by its Board of Directors in accordance with the applicable law.
- **Company:** HCL Technologies Limited and any direct or indirect subsidiary of HCL Technologies Limited.

## Policy Details

It is the duty of all directors, officers and employees to notify the Company if they observe, or learn of, any Unethical and Improper Practices. Failure to promptly raise a known or suspected violation is considered an unethical behavior. Please refer to the Company's Code for the standards of ethical behavior and personal conduct.

## Reporting a Complaint

Reports of allegations of suspected Unethical and Improper Practices are encouraged to be made in writing so as to assure a clear understanding of the issues. Such reports should be factual rather than speculative and must contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of investigative procedures. The Whistleblower need not prove the concern but must demonstrate sufficient grounds for raising the concern. The disclosure can also be made anonymously, but it will be the decision of the EC to further act upon an anonymous Complaint or not, depending upon the disclosure so made. The Company encourages the complainant to provide his / her identity to facilitate timely and effective resolution of the Complaint.

Employees can raise concerns by submitting their grievance in the Global Ethics Helpline. Employees based out of Germany/Netherlands shall continue to raise their grievance by writing to [whistleblower@hcl.com](mailto:whistleblower@hcl.com). Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline.

## Disqualification

In case the EC reaches a conclusion that a Complaint has been made in bad faith and is a false accusation, or is an abuse of process, or the Complaints are repeatedly frivolous, then the EC may recommend that appropriate action, subject to all applicable laws, be taken against the person making the false Complaint(s), including reprimand. Having said that, the Company clearly understands that some Complaints may not result in any finding of wrongdoing or action at a later stage even though they are made in good faith. In such circumstances, no action would be initiated against the Whistleblower. It is also clarified that this process should not be used as a grievance redressal mechanism.

## Access to Chairman of the Audit Committee

The Whistleblower shall have a direct access to the Chairman of the Audit Committee in appropriate or exceptional cases and the Chairman of the Audit Committee is authorized to prescribe suitable directions in this regard. Appropriate or exceptional cases shall be such Complaints that require adequate safeguards against victimization of directors, officers and employees. The Whistleblower can reach out to the Chairman of the Audit Committee by writing at [chairman\\_ac@hcl.com](mailto:chairman_ac@hcl.com)

## Procedure to Submit a Complaint

The Complaint can be made in any of the following methods:

**Written Complaint:** A written Complaint can be sent to the following address:

Thought Arbitrage Research Institute  
C-16, Qutab Institution Area, New Delhi – 110016, India

**Email:** A Complaint can be sent via email to the Ombudsperson at [whistleblower@hcl.com](mailto:whistleblower@hcl.com)

**Note:** Detailed procedure is provided in "Process" section including German Version

## Procedure of Investigation

The Ombudsperson will carry out preliminary investigation of a Complaint to decide if a full investigation is required based on facts alleged in the Complaint. If a full investigation is not required, the Ombudsperson shall submit its report to the EC.

All Complaints received by the Ombudsperson will be categorized in two broad categories:

- Complaints against any EX band (i.e. Executive Vice Presidents) employees and above including CEO, CFO, CPO, and other Corporate Officers, (hereinafter collectively referred as "C" Level officers), and Complaints against any Director of the Company.
- Complaints against others.

Complaints against any "C" Level officers, or Complaints against a Director or Chairman of the Company shall be forwarded to the Chairman of the Audit Committee. The Chairman of the Audit Committee shall decide to deal with such Complaint as he/she may deem fit including appointing any investigation agency to investigate such Complaint and report to the Audit Committee. Any disciplinary action shall be decided by the Audit Committee.

For other Complaints, if the Ombudsperson decides that a full investigation is required, such Complaints shall be forwarded to the Internal Investigation team. The Internal Investigation team shall decide upon further investigation and the next steps in consultation with EC. The Internal Investigation team shall submit its interim report to HR Head and final report to the EC, and any disciplinary action shall be decided by HR head in consultation with the EC, as needed. A periodic update shall be provided by investigation team to the EC and the Audit Committee.

For complaints under "Foreign Investment Review Board (FIRB) at Australia" please report to [legal@dws.com.au](mailto:legal@dws.com.au)

## Remedies and Discipline

If it is determined that an Unethical and Improper Practice has occurred, the following actions may be taken, as deemed fit to correct it:

- Any person found guilty of violation of the Company's Code will be subject to disciplinary action up to and including termination of employment or removal from position associated with the Company.
- Appropriate procedures, policies, and controls will be established in all departments to ensure early detection of similar violations.
- During the investigation period or at any time thereafter, if any employee is found to be (a) retaliating against the Whistleblower, (b) coaching witnesses or (c) tampering with evidence, then it would lead to severe disciplinary action including termination of employment.

For the avoidance of doubt, this Policy does not preclude the remedies/processes available and provided under applicable law(s) for any Unethical and Improper Practice.

## Documentation and Reporting

All documentation pertaining to the Complaint, including but not restricted to the investigation report, corrective action taken, and evidence will be maintained by the Internal Investigation team for a period of not less than 3 years from the date of disposal of the Complaint.

## Roles and Responsibilities

Whistleblower:

- The Whistleblower provides the Complaint, which is the initial information related to a reasonable belief that an Unethical and Improper Practice has occurred. The motivation of a Whistleblower is irrelevant to the consideration of the validity of the allegation.
- Whistleblower (including anonymous Whistleblower) must provide all factual corroborating evidence, as is available/possible, to enable commencement of an investigation, material which demonstrates sufficient grounds for concern. However, the Whistleblower shall refrain from obtaining evidence for which they do not have a right of access and no protection would be guaranteed to the Whistleblower for having obtained information illegally.

- The Whistleblowers will not be immune from disciplinary action if she/he is found guilty of or is a party to the allegations.

## Whistleblower Protection

The Company will ensure to protect Whistleblowers against retaliation, as described below:

- The Company will keep the Whistleblower's identity confidential, unless (a) the person agrees to be identified; (b) identification is necessary to allow the Company or law enforcement officials to investigate or respond effectively to the report; (c) identification is required by law; or (d) the person accused of violations of the Unethical or Improper Practice is entitled to the information as a matter of legal right in disciplinary proceedings.
- The Company prohibits retaliation against a Whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written Complaint with the EC. A proven Complaint of retaliation shall result in a proper remedy for the person harmed and severe disciplinary action including termination of employment against the retaliating person. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

## Communication

- This policy as amended from time to time shall be disclosed on the website of the Company and in the report of the Board of Directors of the Company.
- The Audit Committee reviews the policy and its implementation on periodic basis and is provided a quarterly update on the status of various Complaints received and investigated.

## Annexure 1: Illustrative List of Unethical or Improper Practices

- Breach of Code and other Company policies
- Unethical business practices like bribery taken / given (both financial and non-financial favours) Misuse / embezzlement of Company funds, assets, property, facilities etc.
- Negligence causing substantial risk to public health and safety
- Manipulation of Company data / records
- Financial irregularities, including fraud or suspected fraud
- Abuse of authority
- Violation of law / regulation
- Breach of Company's Code to regulate, monitor and report Insider Trading by designated persons and their immediate relatives, including any incident involving leak or suspected leak of unpublished price sensitive information
- Any other unethical behavior

## Process

### Rules of procedure for the Whistleblowing channels concerning Human Rights and Environmental Protection

The whistleblowing channels can be used to report actual or potential violations in the context of human rights or environmental obligations. This includes, for example, events in our supply chains, but also any observations in or concerning our company. Whistleblowers do not have to be directly affected by the reported facts or have to have knowledge of specific violations against individuals or the environment in order to submit a report. These rules of procedure set out the topics to which reports can relate, how they can be submitted and how reports are processed once they have been submitted.

We will be happy to answer any questions about the procedure via e-mail ([whistleblower@hcl.com](mailto:whistleblower@hcl.com)).

### What is to be reported?

In principle, all potential human rights and environmental violations can be reported via the whistleblowing channels. Here are some specific examples:

### *Human rights risks / violations of human rights-related obligations:*

- Child labour
- Forced labour and slavery
- Discrimination (e.g. unequal treatment in employment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is justified by the requirements of the employment; or the payment of unequal remuneration for work of equal value)
- Disregard of the freedom of association
- Withholding an adequate living wage
- Working conditions that are hazardous to health
- Unlawful forced evictions or unlawful deprivation of land
- Use of private or public security forces in violation of human rights
- Pollution of water, soil and air that can contribute to a violation of human rights, in particular damage to health

### *Environmental risks / violations of environmental obligations:*

- Use of mercury in manufacturing processes and non-environmentally sound management of mercury waste (according to the [Minamata Convention](#))
- Use of persistent organic pollutants and non-environmentally sound management of such waste (according to the [Stockholm Convention](#))
- Non-environmentally sound import and export of hazardous waste (according to the [Basel Convention](#))

### **Submitting reports**

Reports can be submitted via multiple channels. Employees can submit their reports via e-mail

**[whistleblower@hcl.com](mailto:whistleblower@hcl.com)**

or by written compliant to

**Thought Arbitrage Research Institute C-16  
Quatab Institution Area C-16  
110016 New Delhi  
India**

Reports of suppliers can – in addition to the channels mentioned above – be submitted via our online reporting channel:

**[app.convercent.com/en-us/Anonymous/IssueIntake/LandingPage/dceb2afa-6c00-ec11-a983-000d3ab9f062](https://app.convercent.com/en-us/Anonymous/IssueIntake/LandingPage/dceb2afa-6c00-ec11-a983-000d3ab9f062)**

Reports can be submitted securely and at any time. If preferred, whistleblowers can remain completely anonymous. Even if whistleblowers disclose their identity, confidentiality and protection of personal data is guaranteed in accordance with legal requirements.

Whistleblowers can communicate with HCL Technologies through the online whistleblowing channel, even if they choose to remain anonymous. There is no charge for whistleblowers to use the reporting channels.

Alternatively, employees may also use other internal reporting channels available at HCL Technologies (e.g. reports to their supervisors).

### **Processing reports**

At HCL Technologies, every report of misconduct is investigated and handled confidentially to protect the reporting party. Whistleblowers are protected from discrimination, disadvantage and reprisals (cf. Whistleblower Policy-Global). When investigating breaches of the rules, all parties involved are treated fairly. The presumption of innocence always applies until proven otherwise.

The HCL Technologies' reporting office, headed by the HCL ombudsperson accepts reports of violations, documents the reports and confirms receipt of the report within seven days. The reporting office will communicate with you and, if necessary, ask further questions in order to better understand the facts and verify their validity.

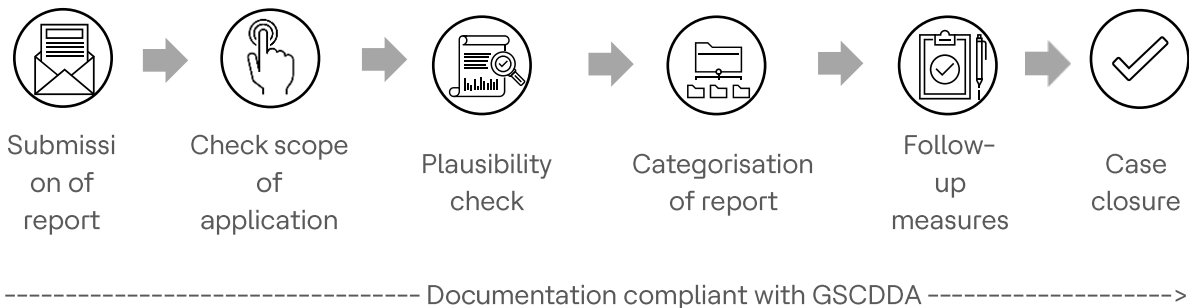
Whistleblowers, will also receive feedback on the status of the case within three months and seven days of receipt of the report at the latest. The feedback includes notification of planned and already taken follow-up measures, as well as the reasons for these. It is possible, for example, that the case will be closed, e.g. because the complaint is outside the scope of these rules of procedure. If sufficient information is not available, or if it is not possible to contact the whistleblower for clarification, or if deadlines set for provision of clarifying information have elapsed without success, the case will also be closed. If the review of the report has not yet been completed, the whistleblower will also be informed accordingly. Feedback will only be provided to the whistleblower insofar as this does not affect internal enquiries or investigations and the rights of the persons who are the subject of a report or who are named in the report are not affected. Applicable legal and internal regulations on data protection will also be complied with in the context of the notification.

The reporting office first checks whether the report submitted falls within the scope of the German Supply Chain Due Diligence Act and categorises the report. In addition, the reporting office] makes an internal recommendation on how to proceed in the case.

The Human Rights Officer decides on the further handling of reports received and the associated checks and recommendations for action. The Human Rights Officer is also responsible for initiating appropriate follow-up measures.

Once the internal investigation has been completed, the results are documented in an investigation report and forwarded to the relevant departments for the implementation of follow-up measures. The departments report to the Human Rights Officer on the measures taken. The Human Rights Officer then closes the case and arranges for the whistleblower to be informed.

The Human Rights Officer ensures that persons involved in processing and investigating reports are independent and free from conflicts of interest. A conflict of interest could exist, for example, if the employee him / herself is the (co-)affected party named in the report. Conflicts of interest must be disclosed immediately and communicated to the Human Rights Officer for examination and assessment of further action, in particular a possible exclusion of the person involved from further processing.

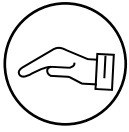


In appropriate cases, HCL Technologies can involve a neutral and mediating third party to help bring about an amicable settlement. In this way, HCL Technologies promotes the realisation of a satisfactory solution that can be supported by all parties. If, in the course of processing a report in accordance with these rules of procedure, it becomes apparent that an amicable settlement appears reasonable, HCL Technologies will seek to achieve such.

**Procedural principles**

In particular, the following key procedural principles will be applied when handling incoming reports and investigating possible violations:

## WHISTLEBLOWER PROTECTION



Information provided by whistleblowers will be treated confidentially. Their identity will not be disclosed if the whistleblower prefers to the extent legally feasible. Discrimination or hostility towards whistleblowers and retaliation against whistleblowers will not be tolerated. Whistleblowers will be protected accordingly. If the whistleblower and / or the person potentially involved is employed by HCL Technologies, protection includes prohibition of transfer, warning, dismissal, demotion, suspension, threats, harassment, or any other form of discrimination in relation to the working or employment conditions of an employee because of a report or complaint.

If the whistleblower and / or the person potentially involved is employed by a supplier, HCL Technologies will work with the supplier to ensure that the person enjoys a comparable level of protection. For example, discussions may be held with suppliers and / or contractual assurances may be requested or used. HCL Technologies will also seek to maintain contact with the whistleblower beyond the conclusion of the procedure.

## NEED-TO-KNOW PRINCIPLE



Information about the reporting and processing of information is restricted to the absolutely necessary parties. The supervisor of the person concerned will only be informed during an investigation if this is necessary to clarify the circumstances.

## CONFIDENTIALITY & NON-DISCLOSURE



Employees involved in the handling of reports and investigations must maintain the confidentiality of the information that comes to their attention. This applies to personal data in particular. They may only inform others on a strict need-to-know basis.

### Responsibility for the whistleblowing channel

Responsible for the HCL Technologies Whistleblowing Channel is:

HCL Technologies Germany GmbH

Björn Brandes

August-Horch-Str. 1,

38518 Gifhorn

Questions or comments about the whistleblowing channel can be placed to [whistleblower@hcl.com](mailto:whistleblower@hcl.com)



## Verfahrensordnung für das Beschwerdeverfahren betreffend Menschenrechte und Umweltschutz

Über das Beschwerdeverfahren können Meldungen bzgl. tatsächlicher oder möglicher Verstöße im Bereich menschenrechtsbezogener oder umweltbezogener Pflichten abgegeben werden. Hierunter fallen bspw. Ereignisse in unseren Lieferketten, aber auch Beobachtungen in bzw. betreffend unserem Haus. Meldende Personen müssen nicht selbst und unmittelbar von dem gemeldeten Sachverhalt betroffen sein oder Kenntnis von konkreten Verletzungen von Menschen oder Umwelt haben, um eine Meldung einreichen zu können. In dieser Verfahrensordnung wird dargestellt, auf welche Themen sich Meldungen beziehen können, wie sie abgegeben werden können und wie Meldungen nach ihrer Abgabe weiterbearbeitet werden.

Fragen zum Ablauf beantworten wir gerne per E-Mail ([whistleblower@hcl.com](mailto:whistleblower@hcl.com)).

### Was soll gemeldet werden?

Über die Meldekanäle können grundsätzlich alle potenziellen menschenrechts- und umweltbezogenen Verletzungen gemeldet werden. Konkrete Beispiele:

#### *Menschenrechtliche Risiken / Verletzungen menschenrechtsbezogener Pflichten:*

- Kinderarbeit
- Zwangsarbeit und Sklaverei
- Diskriminierung (bspw. Ungleichbehandlung in der Beschäftigung, etwa aufgrund von nationaler und ethnischer Abstammung, sozialer Herkunft, Gesundheitsstatus, Behinderung, sexueller Orientierung, Alter, Geschlecht, politischer Meinung, Religion oder Weltanschauung, sofern diese nicht in den Erfordernissen der Beschäftigung begründet ist; oder die Zahlung ungleichen Entgelts für gleichwertige Arbeit)
- Missachtung der Koalitionsfreiheit
- Vorenthalten eines angemessenen Lohns
- Gesundheitsgefährdende Arbeitsbedingungen
- Widerrechtliche Zwangsräumungen oder der widerrechtliche Entzug von Land
- Menschenrechtsverletzender Einsatz von privaten oder öffentlichen Sicherheitskräften
- Verunreinigung von Wasser, Boden und Luft die zu einer Verletzung von Menschenrechten insbesondere Gesundheitsschädigungen beitragen können

#### *Umweltbezogene Risiken / Verletzungen umweltbezogener Pflichten:*

- Verwendung von Quecksilber in Herstellungsprozessen, sowie nicht umweltgerechte Behandlung von Quecksilberabfällen (gemäß [Minamata-Übereinkommen](#))
- Einsatz von persistenten organischen Schadstoffen, sowie der nicht umweltgerechte Umgang mit entsprechenden Abfällen (gemäß [Stockholmer Übereinkommen](#))
- Nicht umweltgerechte Ein- und Ausfuhr gefährlicher Abfälle (gemäß [Basler Übereinkommen](#))

### Einreichen von Meldungen

Meldungen können über mehrere Kanäle eingereicht werden. Mitarbeitende können ihre Meldungen einreichen mittels E-Mail

**[whistleblower@hcl.com](mailto:whistleblower@hcl.com)**

oder schriftlich an

**Thought Arbitrage Research Institute C-16  
Quatab Institution Area C-16  
110016 New Delhi  
India**

Meldungen von Zulieferern können – zusätzlich zu den oben aufgeführten Kanälen – mittels unserem online Meldekanal eingereicht werden:

**[app.convercent.com/en-us/Anonymous/IssueIntake/LandingPage/dceb2afa-6c00-ec11-a983-000d3ab9f062](https://app.convercent.com/en-us/Anonymous/IssueIntake/LandingPage/dceb2afa-6c00-ec11-a983-000d3ab9f062)**

Meldungen können gesichert und rund um die Uhr abgegeben werden. Auf Wunsch können meldende Personen vollständig anonym bleiben. Selbst wenn meldende Personen ihre Identität offenlegen, ist die Vertraulichkeit sowie der Schutz der personenbezogenen Daten gemäß den gesetzlichen Vorgaben gewährleistet.

Über den Online-Meldekanal können meldende Personen – selbst bei Anonymität – auch nach Meldungseinreichung mit HCL Technologies in Kontakt bleiben. Die Nutzung der Meldekanäle ist für die meldende Person selbstverständlich kostenlos.

Mitarbeitende können alternativ auch weitere HCL Technologies intern zur Verfügung stehende Meldekanäle nutzen (z. B. Meldungen an Vorgesetzte).

## **Umgang mit Meldungen**

Bei HCL Technologies wird jeder Meldung auf Fehlverhalten nachgegangen und zum Schutz des Meldenden vertraulich gehandelt. Meldende werden bei HCL Technologies vor Diskriminierung, Benachteiligung und Repressalien (vgl. globale Whistleblower Richtlinie) geschützt. Bei der Aufklärung von Regelverstößen werden alle Beteiligten fair behandelt. Bis zum Beweis des Gegenteils gilt stets die Unschuldsvermutung.

Die HCL Technologies Meldestelle, unter Leitung des HCL Technologies Ombudsmannes nimmt Meldungen bzgl. Regelverstößen entgegen, dokumentiert die Meldungen und bestätigt den Empfang der Meldungen innerhalb von sieben Tagen. Die Meldestelle kommuniziert mit Ihnen und stellt ggfs. weitere Fragen, um den Sachverhalt besser zu verstehen und plausibilisieren zu können.

Meldende erhalten zudem spätestens innerhalb von drei Monaten und sieben Tagen nach Eingang der Meldung eine Rückmeldung über den Stand des Falles. Die Rückmeldung umfasst die Mitteilung geplanter und bereits ergriffener Folgemaßnahmen, sowie die Gründe für diese. Möglich ist bspw., dass der Fall, z.B. weil die Beschwerde nicht in den Geltungsbereich dieser Verfahrensordnung fällt, geschlossen wird. Sofern keine ausreichenden Informationen vorliegen, oder eine Kontaktaufnahme mit der meldenden Person zur Klärung nicht möglich ist oder gesetzte Fristen zur Informationsklärung erfolglos verstrichen sind, wird der Fall ebenfalls geschlossen. Sollte die Prüfung der Meldung noch nicht abgeschlossen sein, wird dies der meldenden Person ebenfalls mitgeteilt. Eine Rückmeldung an die meldende Person wird nur insoweit erfolgen, als dadurch interne Nachforschungen oder Ermittlungen nicht berührt und die Rechte der Personen, die Gegenstand einer Meldung sind oder die in der Meldung genannt werden, nicht beeinträchtigt werden. Auch im Rahmen der Benachrichtigung werden die geltenden gesetzlichen sowie internen Regelungen zum Datenschutz eingehalten.

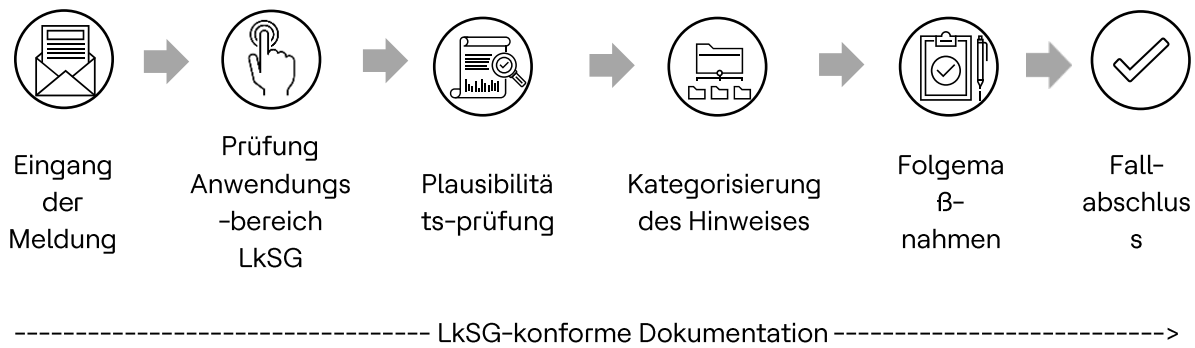
Die Meldestelle prüft hierzu zunächst, ob der abgegebene Hinweis in den Anwendungsbereich des Lieferkettensorgfaltspflichtengesetzes fällt und kategorisiert den Hinweis. Darüber hinaus gibt die Meldestelle intern eine Empfehlung ab, wie in dem Fall weiterverfahren werden soll.

Über den weiteren Umgang mit eingegangenen Meldungen sowie die damit verbundenen Prüfungen und Handlungsempfehlungen entscheidet der Menschenrechtsbeauftragte. Dieser ist auch verantwortlich für die Einleitung entsprechender Folgemaßnahmen.

Nach Abschluss der internen Untersuchung werden die Ergebnisse in einem Untersuchungsbericht dokumentiert und relevanten Abteilungen zur Ausführung von Folgemaßnahmen zugeleitet. Die Abteilungen berichten dem Menschenrechtsbeauftragten über die ergriffenen Maßnahmen. Danach schließt der Menschenrechtsbeauftragte den Fall ab und veranlasst eine Information an die meldende Person.

Der Menschenrechtsbeauftragte stellt dabei sicher, dass in den Prozess der Bearbeitung und Untersuchung von Meldungen involvierte Mitarbeitende unabhängig und frei von Interessenskonflikten sind. Ein Interessenskonflikt / eine Befangenheit könnte beispielsweise vorliegen, wenn der Mitarbeitende selbst der in der Meldung genannte (Mit-)Betroffene ist. Interessenskonflikte

müssen unverzüglich offengelegt und dem Menschenrechtsbeauftragten zur Prüfung und Beurteilung des weiteren Vorgehens, insbesondere einem möglichen Ausschluss der bearbeitenden Person von der weiteren Bearbeitung, mitgeteilt werden.



In entsprechend gelagerten Fällen, kann HCL Technologies einen neutralen und vermittelnden Dritten einschalten, um eine einvernehmliche Streitbeilegung herbeizuführen. Damit fördert HCL Technologies die Umsetzung einer zufriedenstellenden Lösung, die von allen Parteien mitgetragen werden kann. Sofern sich im Rahmen der Bearbeitung einer Meldung nach dieser Verfahrensordnung zeigt, dass eine einvernehmliche Streitbeilegung sinnvoll erscheint, wird sich HCL Technologies darum bemühen.

## Verfahrensgrundsätze

Bei der Bearbeitung eingehender Meldungen und der Untersuchung von möglichen Regelverstößen werden insbesondere folgende zentrale Verfahrensgrundsätze zugrunde gelegt:

### SCHUTZ DES MLEDENDEN

Aussagen der Meldenden werden vertraulich behandelt. Ihre Identität wird, wenn die Meldenden es wünschen und es gesetzlich möglich ist, nicht offengelegt. Benachteiligungen oder Anfeindungen von Meldenden sowie Repressalien gegen Meldende werden nicht geduldet. Meldende werden entsprechend geschützt. Sofern die meldende Person und / oder der potenziell Beteiligte bei HCL Technologies beschäftigt sind, zählen dazu der Schutz vor Versetzung, Abmahnung, Kündigung, Herabstufung, Suspendierung, Drohungen, Belästigung oder anderer Arten der Diskriminierung in Bezug auf die Arbeits- oder Beschäftigungsbedingungen eines Mitarbeitenden aufgrund einer Meldung oder einer Beschwerde.

Ist die meldende Person und / oder der potenziell Beteiligte bei einem Zulieferer beschäftigt, wirkt HCL Technologies in Zusammenarbeit mit dem Zulieferer darauf hin, dass die Person ein vergleichbares Schutzniveau genießt. Hierzu können bspw. Lieferantengespräche geführt und / oder entsprechend vertragliche Zusicherungen eingefordert oder genutzt werden. *Außerdem bemüht sich HCL Technologies zusätzlich um Kontakt mit der meldenden Person über den Abschluss des Verfahrens hinaus.*

### ANWENDUNG DES ERFORDERLICHKEITSPRINZIPS (sog. NEED-TO-KNOW-PRINZIP)

Informationen über die Meldung und Bearbeitung werden auf den zwingend notwendigen Personenkreis beschränkt. Die Führungskräfte der betroffenen Person werden während einer Untersuchung nur dann informiert, wenn es für die Sachverhaltsaufklärung erforderlich ist.



## **VERTRAULICHKEIT & GEHEIMHALTUNG**

Die mit der Bearbeitung der Meldungen und Untersuchungen betrauten Mitarbeitenden haben die ihnen zur Kenntnis erlangten Informationen grundsätzlich vertraulich gegenüber anderen Personen zu behandeln. Dies gilt insbesondere für personenbezogene Daten. Sie dürfen andere Personen nur unter strikter Wahrung des Need-to-know-Prinzips informieren.

### **Zuständigkeit für den Whistleblowing-Kanal**

Zuständig für den HCL Technologies Whistleblowing-Kanal ist:

HCL Technologies Germany GmbH

Björn Brandes  
August-Horch-Str. 1,  
38518 Gifhorn

Fragen oder Anmerkungen zum Whistleblowing-Kanal können per E-Mail an [whistleblower@hcl.com](mailto:whistleblower@hcl.com) gestellt werden.

## Country Specific Addendums

### HCLTech Whistleblower Policy-Global

### Politică HCLTech privind Sistemul Avertizorilor în Interes Public

#### Addendum

#### Anexă

Romania

România

**HCL Technologies Romania S.R.L.  
Whistleblowing Policy**

**Politica HCL Technologies România S.R.L.  
privind  
sistemul avertizorilor în interes public**

#### Objective

The purpose of this addendum to the Global Whistleblower Policy is to inform employees of HCL Technologies Romania S.R.L (the "**Company**") about the conditions, procedures and measures for the protection of employees in the Company who reports on wrongdoing, as well as the procedures and conditions for the submission and consideration of such reporting. This whistleblowing policy and instructions (the "**Addendum**") therefore aim to provide routines on how concerns regarding suspected wrongdoings within the Company may be raised.

This Addendum applies within the Company level.

This Addendum is prepared in view of the requirements of the Law No. 361/2022 on the protection of whistleblowers in the public interest (hereinafter the "**Whistleblowing Act**"), implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law ("hereinafter the "**Whistleblowing Directive**").

It is the responsibility of each manager within the Company to ensure that this Addendum is known and complied with within their respective area of responsibility. All employees and other individuals performing work for the Company shall familiarise themselves with this Addendum and follow the contents set out herein.

The term "**Report**" means the communication, through the procedures set out in this Addendum, of acts or omissions which:

#### Obiectiv

Scopul acestei Anexe la Politica Globală de Avertizare este de a informa salariații HCL Technologies România S.R.L. (denumită în continuare "**Societatea**") cu privire la condițiile, procedurile și măsurile de protecție a salariaților din cadrul Societății care raportează abateri, precum și cu privire la procedurile și condițiile de depunere și analiză a acestor raportări. Prin urmare, această politică și instrucțiunile de denunțare a neregulilor ("**Anexa**") au ca scop furnizarea de proceduri de lucru cu privire la modul în care pot fi exprimate îngrijorări cu privire la suspiciuni de nereguli la nivelul Societății.

Prezenta Anexă se aplică la nivelul Societății.

Prezenta Anexă este elaborată avându-se în vedere prevederile Legii nr. 361/2022 privind protecția avertizorilor de integritate în interes public (denumită în continuare "**Legea Avertizorilor**"), care transpune Directiva (UE) 2019/1937 a Parlamentului European și a Consiliului din 23 octombrie 2019 privind protecția persoanelor care raportează încălcări ale dreptului Uniunii (denumită în continuare "**Directiva avertizorilor de integritate**").

Este responsabilitatea fiecărui manager din cadrul Societății să se asigure că prezenta Anexă este cunoscută și respectată în cadrul sectorului lor de responsabilitate. Toți angajații și alte persoane care desfășoară activități pentru Societate trebuie să se familiarizeze cu prezenta Anexă și să respecte conținutul acesteia.

Termenul „**Raportare**” se referă la comunicarea, prin intermediul procedurilor stabilite în prezenta Anexă, a acțiunilor sau omisiunilor care:

- constitutes or may constitute, according to the provisions of the Whistleblowers Act, a violation of, or an inducement to violate:
  - the legal provisions, which concern areas such as: public procurement; financial services, products and markets, as well as prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiological protection and nuclear safety; food and feed safety, animal health and welfare; public health; consumer protection; protection of privacy and personal data and security of networks and information systems, set out in Annex no. 2 of the Whistleblowers Act; infringements affecting the financial interests of the European Union, as referred to in Article 325 of the Treaty on the Functioning of the European Union and as detailed in the relevant European Union measures; infringements relating to the internal market, referred to in Article 26 paragraph 2 of the Treaty on the Functioning of the European Union, including breaches of European Union competition and state aid rules, and breaches relating to the internal market in respect of acts which violate the rules on corporate taxation or mechanisms whose purpose is to obtain a tax advantage which is contrary to the object or purpose of the applicable corporate tax law, which constitute disciplinary misconduct, contraventions or offences, or which are contrary to the object or purpose of the Whistleblowers Act;
- cause or could cause, in the course of relations with the Company, any kind of harm (e.g., economic, environmental, to the safety of employees or third parties, or merely reputational) to the Company, as well as to third parties such as shareholders, business partners, customers or the external community.
- constituie sau pot constitui, în conformitate cu dispozițiile Legii Avertizorilor, o încălcare sau o instigare la încălcarea:
  - dispozițiilor legale, care privesc domeniul cum ar fi: achizițiile publice; serviciile, produsele și piețele financiare, precum și prevenirea spălării banilor și a finanțării terorismului; siguranța și conformitatea produselor; siguranța transportului; protecția mediului; protecția radiologică și siguranța nucleară; siguranța alimentelor și a hranei pentru animale, sănătatea și bunăstarea animalelor; sănătatea publică; protecția consumatorilor; protecția vieții private și a datelor cu caracter personal și a securității rețelelor și sistemelor informatice, prevăzute în anexa nr. 2 a Legii Avertizorilor, încălcări care aduc atingere intereselor financiare ale Uniunii Europene, astfel cum sunt menționate la art. 325 din Tratatul privind funcționarea Uniunii Europene și cum sunt detaliate în măsurile relevante ale Uniunii Europene; încălcări referitoare la piața internă, menționate la art. 26 alin. 2 din Tratatul privind funcționarea Uniunii Europene, inclusiv încălcări ale normelor Uniunii Europene în materie de concurență și de ajutoare de stat, precum și încălcări referitoare la piața internă în ceea ce privește actele care încalcă normele privind impozitarea societăților sau mecanismele al căror scop este obținerea unui avantaj fiscal ce contravine obiectului sau scopului dreptului aplicabil în materie de impozitare a societăților, ce reprezintă abateri disciplinare, contravenții sau infracțiuni, sau care contravin obiectului sau scopului Legii Avertizorilor;
- cauzează sau ar putea cauza, în cursul relațiilor cu Societatea, orice fel de prejudiciu (e.g., economic, de protecție a mediului, la adresa siguranței salariaților sau a terților, sau pur și simplu reputațional) pentru Societate, precum și pentru terți, cum ar fi acționarii, partenerii de afaceri, clienții sau comunitatea externă.

Prezenta Anexă se aplică Societății, fără a aduce atingere oricăror legi naționale specifice cu privire la același obiect care intră în conflict cu aceasta.

This Addendum applies to the Company, without prejudice to any specific local laws on the same subject matter that conflict with it.

The provisions of this Addendum do not affect and in no way limit the right or obligation (as defined by locally applicable regulations) to report to the competent judicial, supervisory or regulatory authorities, to any other bodies/parties designated for this purpose by local regulations, or to report to any control bodies established in the Company.

### Applicability

Recipients of this Addendum (hereinafter "**Recipients**" and/or "**Whistleblowers**") are:

- (a) Employees of the Company;
- (b) self-employed persons within the meaning of Article 49 of the Treaty on the Functioning of the European Union;
- (c) paid or unpaid volunteers and trainees;
- (d) any person working under the supervision and direction of the Company, its subcontractors and suppliers; and
- (e) persons whose employment relationship has not yet commenced and who report through internal or external reporting channels or publicly disclose information regarding violations of law obtained during the recruitment process or other pre-contractual negotiations or where the employment or service relationship has been terminated;

### Definitions

**Information relating to a breach of law:** information - in accordance with the provisions of the Whistleblowers Act - any information including reasonable suspicion, about actual or potential breaches of law which have occurred or are likely to occur in authorities, public institutions or other legal entities governed by public law, as well as in legal entities governed by private law, in which the Whistleblower works or has worked or with which the Whistleblower is or has been in contact through his/her activity, as well as information about attempts to conceal such breaches.

Dispozițiile prezentei Anexe nu influențează și nu limitează în niciun fel dreptul sau obligația (așa cum sunt definite de reglementările aplicabile la nivel local) de a raporta autorităților judiciare, de supraveghere sau de reglementare competente, oricăror alte organisme/părți desemnate în acest scop de reglementările locale, sau de a raporta oricăror organisme de control stabilite în cadrul Societății.

### Aplicabilitate

Destinatarii prezentei Anexe (denumiți în continuare „**Destinatarii**” sau „**Avertizorii**”) sunt:

- (a) Salariații Societății,
- (b) persoanele care desfășoară o activitate independentă, în înțelesul art. 49 din Tratatul privind funcționarea Uniunii Europene,
- (c) voluntarii și stagiarii remunerați sau neremunerați;
- (d) oricare persoane care lucrează sub supravegherea și conducerea Societății, a subcontractanților și a furnizorilor acesteia; și
- (e) persoanele ale căror raporturi de muncă nu au început încă și care efectuează raportări prin intermediul canalelor de raportare interne sau externe sau divulgă public informații privind încălcări ale legii obținute în timpul procesului de recrutare sau altor negocieri precontractuale sau în cazul în care raportul de muncă sau raportul de serviciu a încetat.

### Definiții

**Informațiile referitoare la încălcări ale legii:** sunt definite - în conformitate cu dispozițiile Legii Avertizorilor - drept informații, inclusiv suspiciuni rezonabile, cu privire la încălcări efective sau potențiale ale legii, care s-au produs sau care sunt susceptibile să se producă în cadrul autorităților, instituțiilor publice sau în cadrul altor persoane juridice de drept public, precum și în cadrul persoanelor juridice de drept privat, în care lucrează sau a lucrat avertizorul în interes public sau cu care acesta este sau a fost în contact prin intermediul activității sale, precum și informațiile cu privire la încercări de a ascunde astfel de încălcări.

**Target Person:** persons involved in the possible infringement or having knowledge, if known.

**Professional context** – professional activities, current or previous, of any kind, remunerated or not, carried out within the authorities, public institutions, other legal persons of public law, as well as within private legal entities, on the basis of which persons can obtain information on violations of the law and may suffer retaliation in case of their reporting;

**The Company's' members of corporate bodies:** shareholders and persons who are members of the administrative, management or supervisory body of an undertaking, including non-executive members of the board of directors.

### Submission and receipt of a Report

Recipients who detect or otherwise become aware of conduct, by parties who have relations with the Company, which may fall within the scope of this Addendum (as defined above) engaged in the course of working activities or which have an impact on these, must report the related facts, events and circumstances without delay, in good faith and on the basis of reasonable grounds. Notifications of breaches of personal data protection will not be made through the breach reporting system ("**Warning System**"). Such notifications must still be made through the reporting channel to the Data Protection Officer. Reports can also be made anonymously.

Moreover, Complaints related to HR issues will be forwarded to [hear@hcl.com](mailto:hear@hcl.com) and issues related to sexual harassment will be forwarded to [Secure@hcl.com](mailto:Secure@hcl.com).

Reports must be documented and detailed, so as to provide useful and appropriate information enabling effective verification of the validity of the events reported. When known to the Whistleblower, it is particularly important that the Report includes:

- (a) first and last name of the Whistleblowers;
- (b) the contact details of the Whistleblowers;

**Persoana Vizată:** persoanele implicate în posibila încălcare a legii sau care au cunoștință, dacă se cunosc.

**Context profesional** – activități profesionale, actuale sau anterioare, de orice fel, remunerate sau nu, desfășurate în cadrul autorităților, instituțiilor publice, altor persoane juridice de drept public, precum și în cadrul persoanelor juridice de drept privat, pe baza cărora persoanele pot obține informații cu privire la încălcări ale legii și pot suferi represalii în cazul în care le raportează;

**Membrii organelor corporative ale Societății:** asociații și persoanele care fac parte din organul de administrare, de conducere sau de supraveghere al unei întreprinderi, inclusiv membrii neexecutivi ai consiliului de administrație.

### Transmiterea și recepționarea unei Raportări

Cei care sesizează sau iau cunoștință în orice alt mod de un comportament al unor părți în relații cu Societatea, care ar putea intra în domeniul de aplicare al prezentei Anexe (astfel cum este definit în prezenta Anexă), implicat în cursul activităților profesionale sau care are un impact asupra acestora, trebuie să raporteze faptele, evenimentele și circumstanțele aferente fără întârziere, cu bună credință și pe baza unor motive rezonabile. Notificările privind încălcarea protecției datelor cu caracter personal nu se vor face prin intermediul sistemului de raportare a încălcărilor („**Sistemul de Avertizare**"). Astfel de notificări trebuie să fie făcute în continuare prin intermediul canalului de raportare către Responsabilul cu Protecția Datelor. De asemenea, Raportările pot fi făcute în mod anonim.

În plus, sesizările legate de probleme de resurse umane vor fi transmise la [hear@hcl.com](mailto:hear@hcl.com), iar cele legate de hărțuirea sexuală vor fi transmise la [Secure@hcl.com](mailto:Secure@hcl.com).

Raportările trebuie să fie documentate și detaliate, astfel încât să furnizeze informații utile și adecvate care să permită efectuarea unei verificări eficiente a veridicității aspectelor raportate. Atunci când sunt cunoscute de către denunțător, este deosebit de important ca Raportarea să includă:

- (a) numele și prenumele Avertizorului;
- (b) datele de contact ale Avertizorului;



- (c) the professional context in which the relevant information was obtained;
- (d) Target Person;
- (e) a detailed description of the facts that may constitute possible violations within the Company;
- (f) evidence in support of the Report, as appropriate;
- (g) date and signature as appropriate.

As an exception to the above, Reports that do not include the name, surname, contact details or signature of the Whistleblower shall be examined and resolved to the extent that they contain substantiated indications of violations of law. The identity of the Target Person shall be protected while the actions following the Report are ongoing, unless, following the settlement of the Report, it is determined that the Target Person is not guilty of the violations of law that were the subject of the Report.

The Targeted Person shall be informed immediately of the investigation against him or her, insofar as this is possible without obstructing or endangering the purpose of the investigation. The Targeted Person shall be given the opportunity to make certain clarifications regarding the allegations against him or her and/or to have access to his or her personal file at the latest before the investigation is completed. Upon completion of the final Report, the Targeted Person is informed of the outcome.

If investigations carried out at an early stage show that no breach can be identified, the Targeted Person may be omitted from the information or given the opportunity to make certain clarifications, provided that this is legally possible.

The **Ombudsperson or Ombudsperson Function ("OF")** is responsible for receiving and examining the Report. All Reports received by the OF will be categorized in the following two broad categories:

- ✚ Reports against any EX band (e.g. Executive Vice Presidents) employees and above, including CEO, CFO, CHRO, and other Corporate Officers (hereinafter collectively referred as "**C**" Level

- (c) contextul profesional în care au fost obținute informațiile relevante;
- (d) Persoana Vizată;
- (e) o descriere amănunțită a faptelor care pot constitui posibile încălcări din cadrul Societății;
- (f) probele în susținerea Raportării, după caz;
- (g) data și semnătura, după caz.

Ca o excepție față de cele de mai sus, Raportările care nu cuprind numele, prenumele, datele de contact sau semnătura Avertizorului se examinează și se soluționează în măsura în care conțin indicii temeinice referitoare la încălcări ale legii. Identitatea Persoanei Vizate este protejată cât timp sunt în desfășurare acțiunile subsecvente Raportării sau divulgării publice, cu excepția cazului în care, ca urmare a soluționării Raportării sau divulgării, se constată că Persoana Vizată nu este vinovată de încălcările legii, care au făcut obiectul Raportării.

Persoana Vizată este informată de îndată cu privire la investigația desfășurată împotriva sa, în măsura în care acest lucru este posibil fără a obstructiona sau a pune în pericol scopul investigației. Persoanei Vizate i se oferă posibilitatea de a face anumite precizări cu privire la acuzațiile care o privesc și/sau de a avea acces la propriul dosar personal cel târziu înainte de finalizarea anchetei. După finalizarea raportului final, Persoana Vizată este informată cu privire la rezultat.

În cazul în care investigațiile efectuate într-o fază incipientă arată că nu poate fi identificată nicio încălcare, Persoana Vizată poate să nu fie informată sau să i se ofere posibilitatea de a face anumite precizări, cu condiția ca acest lucru să fie posibil din punct de vedere juridic.

**Ombudsmanul sau Funcția de Ombudsman („OF”)** este responsabil/ă de primirea și examinarea Raportării.

Toate Raportările primite de către OF vor fi clasificate în următoarele două mari categorii:

- ✚ Raportări împotriva oricărui angajat din categoria EX (e.g. vicepreședinți executivi) și de nivel superior, inclusiv CEO, CFO, CHRO și alți directori corporativi (denumiți în continuare în

officers) and Reports against any Director of the Company;

🚩 Reports against others.

Reports against any "C" Level officers, or Reports against a Director or Chairman of the Company shall be forwarded to the **Chairman of the Audit Committee**. The Chairman of the Audit Committee shall decide to deal with such Report as he/ she may deem fit including appointing any investigation agency to investigate such Report and notice the Audit Committee. Any disciplinary action shall be decided by the Audit Committee.

As regards the others Reports, if the OF decides that a full investigation is required, such Reports shall be forwarded to the Internal Investigation team (hereinafter referred to as the **"Designated Committee"**).

The Report must be submitted through the Warning System, also in Romanian language, via the following channels:

- the **Convercent platform**: A Signal can be submitted through the Convercent Platform. Accessing the Platform is done through Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline.;
- **by post**, to the **ordinary** postal address:  
*Thought Arbitrage Research Institute*  
  
*C-16, Qutab Institution Area, New Delhi - 110016, India*  
for the attention of **HCL Ombudsperson or Ombudsperson Function and/or HCL Ethics Committee**;
- **e-mail**: whistleblower@hcl.com; & : Rodica-Maria Bradatan [rodica.bradatan@hcl.com](mailto:rodica.bradatan@hcl.com)
- external channels: online platform: <https://avertizori.integritate.eu/>; e-mail address: [avertizari@integritate.eu](mailto:avertizari@integritate.eu); telephone number: 0372.069.869.

Whenever a Report is submitted, within 7 days of receipt the OF and/or the Designated Committee will send a notification to the Whistleblower confirming that the Report has been received and taken over, unless it is not possible to contact the Whistleblower.

mod colectiv "**C" Level officers**) și Raportări împotriva oricărui Administrator al Societății;

🚩 Raportări împotriva altor persoane.

Raportările împotriva oricărui angajat de nivel "C" sau Raportările împotriva unui Administrator sau Președinte al Societății se transmit **Președintelui Comitetului de Audit**. Președintele Comitetului de Audit stabilește modul de soluționare a unei astfel de Raportări, după cum consideră necesar, inclusiv prin numirea unei agenții de investigație care să investigheze o astfel de Raportare și anunță Comitetul de Audit. Orice acțiune disciplinară este decisă de Comitetul de Audit.

În ceea ce privește celelalte Raportări, în cazul în care OF decide că este necesară o investigație completă, aceste raportări sunt transmise echipei de investigație internă (denumit în continuare „**Comitetul Desemnat**”). Raportarea trebuie să fie transmisă prin intermediul Sistemului de Avertizare, de asemenea în limba română, prin intermediul următoarelor canale:

- **platformei Convercent** "Un semnal poate fi transmis prin intermediul platformei Convercent. Accesarea platformei se face prin Path: MyHCLTech >> Panglica de sus (Meniul principal)>> Linia de asistență pentru etică.;
- prin **poștă**, la adresa poștală obișnuită:  
*Institutul de Cercetare a Arbitrajului de Analiză*  
*C-16, Qutab Institution Area, New Delhi - 110016, India*  
în atenția **Ombudsmanului HCL sau a Funcției de Ombudsman și/sau a Comitetului de etică HCL**;
- **e-mail**: whistleblower@hcl.com; & : Rodica-Maria Bradatan [rodica.bradatan@hcl.com](mailto:rodica.bradatan@hcl.com)
- canale externe: platforma online: <https://avertizori.integritate.eu/>; adresa de e-mail: [avertizari@integritate.eu](mailto:avertizari@integritate.eu); număr de telefon: 0372.069.869.

Ori de câte ori este transmisă o Raportare, în termen de 7 zile de la primire, OF și/sau Comitetul Desemnat va trimite o notificare avertizorului, confirmând faptul că Raportarea a fost primită și preluată, cu excepția cazului în care nu este posibil să se ia legătura cu

The notification must contain an indication that the OF and/or the Designated Committee are responsible for further action.

If a Whistleblower submits more than one Report on the same matter, the Reports are joined and the Whistleblower receives a single notification. If a new Report on the same subject is received after the Report has been submitted, without providing additional information justifying a different subsequent action, the Report is terminated.

### **Verification of the reports and following actions**

The Designated Committee is called upon to conduct a prompt and accurate investigation, respecting principles of impartiality, fairness and confidentiality with regard to all parties involved. The Designated Committee shall:

- receive the Report;
- process the Report;
- conduct investigations;
- prepare the final Report;
- inform the department responsible for the recommended action in each case;
- follow up the implementation of the recommended actions;
- involve the authorities and fully document the Report;
- deal with the circumstances in an impartial manner, being independent in the performance of these duties.

During the course of such verification, the Designated Committee can be supported by relevant Company's departments and, when deemed appropriate, from external consultants specialising in the area of the Report, whose involvement is conducive to the verification of the Report, ensuring confidentiality and, where possible, making anonymous any personal data included in the Report.

Avertizorul. Notificarea trebuie să conțină o indicație conform căreia Comitetul Desemnat și/sau OF este/sunt responsabili pentru acțiunile ulterioare.

În cazul în care un Avertizor transmite mai multe Raportări cu privire la aceeași chestiune, Raportările sunt reunite iar Avertizorul primește o singură notificare. În cazul în care se primește o nouă Raportare pe același subiect după ce a fost transmisă, fără a se furniza informații suplimentare care să justifice o acțiune ulterioară diferită, Raportarea este clasată.

### **Verificarea Raportărilor și acțiunile ulterioare**

Comitetul Desemnat este responsabil pentru verificarea Raportării, fără a aduce atingere legislației locale specifice și cu excepția cazului în care există un conflict de interese. Acesta este chemat să efectueze o investigație promptă și riguroasă, respectând principiile de imparțialitate, echitate și confidențialitate cu privire la toate părțile implicate. Comitetul Desemnat:

- primește Raportarea;
- prelucrează Raportarea;
- efectuează investigații;
- pregătește raportul final;
- informează departamentul responsabil cu privire la măsurile recomandate în fiecare caz;
- urmărește punerea în aplicare a acțiunilor recomandate;
- implică autoritățile și documentează complet Raportarea;
- tratează împrejurările într-o manieră imparțială, fiind independent în îndeplinirea acestor atribuții.

Pe durata unei asemenea verificări, Comitetul Desemnat poate fi sprijinit de departamentele relevante ale Societății și, atunci când se consideră necesar, de consultanți externi specializați în domeniul Raportării, a căror implicare este utilă verificării Raportării, asigurând confidențialitatea și, dacă este posibil, anonimizarea oricăror date cu caracter personal incluse în Raportare.

The Reports will be examined to determine whether they are substantiated. This includes preliminary investigation to determine whether there is sufficient factual evidence of an actual or potential infringement (*plausibility check*).

The Report is allocated to one of the following categories:

- (a) suspected infringement;
- (b) suspicion of an attempt to conceal an infringement; or
- (c) no suspicion.

In case of suspicion, the Report is factually and legally investigated. During the investigation, the Designated Committee can invite the Whistleblower to provide further information, if necessary, to assist the inquiry. In cases where a physical or virtual meeting is held between the Whistleblower and the Designated Committee, complete and accurate documentation of this meeting will be ensured, subject to the Whistleblower's consent, and access will also be made available to the Whistleblower.

On completion of the verification phase, the Designated Committee will prepare a Report summarizing the investigations carried out and the evidence gathered which includes, in particular, the facts of the case, the main results of the plausibility check or investigation and recommendations for action.

Based on the results, this will then be shared with relevant Company's departments and the involved heads of the Company, in order to determine an intervention plan and decide what action to take to protect the Company, the Whistleblower and any other stakeholders involved. In carrying out such activities, the Company guarantee respect for the Whistleblower's confidentiality and rejects any retaliatory act towards them or any other party involved, as set out under this Addendum.

Otherwise, if the investigations conclude that there is insufficient evidence or that the claims made in the Report cannot be substantiated, the Report will be archived, together with the reasons for it, by the Designated Committee.

Raportările vor fi examinate pentru a se stabili dacă sunt întemeiate. Aceasta include o investigație preliminară pentru a determina dacă există suficiente dovezi concrete ale unei încălcări reale sau potențiale (*verificare a plauzibilității*).

Raportarea este alocată uneia dintre următoarele categorii:

- (a) suspiciunea de încălcare;
- (b) suspiciunea unei încercări de a ascunde o încălcare; sau
- (c) nicio suspiciune.

În caz de suspiciune, Raportarea este investigată din punct de vedere faptic și juridic. În timpul investigației, Comitetul Desemnat poate invita Avertizorul să furnizeze informații suplimentare, dacă este necesar, pentru a contribui la anchetă. În cazurile în care are loc o întâlnire fizică sau virtuală între Avertizor și Comitetul Desemnat, se va asigura o documentare completă și exactă a acestei întâlniri, cu acordul Avertizorului iar accesul va fi, de asemenea, asigurat Avertizorului.

La finalizarea etapei de verificare, Comitetul Desemnat va întocmi un Raport care va rezuma investigațiile efectuate și dovezile adunate și care va include, în special, datele cazului, principalele rezultate ale verificării plauzibilității sau ale investigației și recomandările de acțiune.

Pe baza rezultatelor, acesta va fi apoi distribuit departamentelor relevante ale Societății, pentru a stabili un plan de intervenție și a decide ce măsuri trebuie luate pentru a proteja Societatea, Avertizorul și orice alte părți interesate implicate. În desfășurarea acestor activități, Societatea garantează respectarea confidențialității Avertizorului și exclude orice act de represalii față de acesta sau față de orice altă parte implicată, astfel cum se prevede în prezenta Anexă.

În caz contrar, dacă în urma investigațiilor se ajunge la concluzia că nu există probe suficiente sau că afirmațiile făcute în Raportare nu pot fi susținute, Raportarea va fi arhivată, împreună cu motivele care stau la baza acesteia, de către Comitetul Desemnat.

Once the verification phase has been completed, the Whistleblower will be informed of the outcome of the investigation and any measures envisaged or adopted to remedy the issue revealed by the Report. In any case, an update on the progress of the investigation is necessary within three months **(i)** of the Report being received, even if the investigation has not yet been concluded or, **(ii)** if the receipt of the Report has not been acknowledged, after the expiry of the seven-day period referred to above.

The investigation is terminated when:

- the Report does not contain the information referred to in the Addendum, with the exception of the Whistleblower's identification data, and the Designated Committee has requested the completion of such missing information within 15 days, without this obligation being complied with;
- the Report is submitted anonymously and does not contain sufficient information on violations of the law to allow the Report to be reviewed and resolved, and the Designated Committee has requested for the Report to be completed with such missing information within 15 days, without this obligation being complied with.

The Designated Committee may decide to terminate the procedure if, after examining the Report, it is established that the infringement is clearly minor and does not require further action other than termination of the procedure. This provision is deemed not to interfere with the obligation to maintain confidentiality, to inform the Whistleblower and does not affect other applicable obligations or procedures for the settlement of the reported infringement.

The decision to terminate the investigation shall be notified to the Whistleblower, specifying the legal grounds.

Documentation relating to each Report received will be kept, with respect to confidentiality requirements, for a period of 5 years. After the expiry of the 5-year retention period, they shall be destroyed, regardless of the type of support on which they are stored.

The Reports shall be recorded in a register (hereinafter referred to as "**the Register**") which shall include:

- date of receipt of the Report;

După finalizarea etapei de verificare, Avertizorul va fi informat cu privire la rezultatul investigației și la orice măsuri preconizate sau adoptate pentru a remedia problema dezvăluită de Raportare. În orice caz, este necesară o punere la curent cu privire la progresul investigației în termen de trei luni **(i)** de la primirea Raportării, chiar dacă investigația nu a fost încă încheiată sau, **(ii)** dacă nu s-a confirmat primirea Raportării, după expirarea perioadei de șapte zile menționate mai sus.

Investigația este închisă atunci când:

- Raportarea nu conține informațiile menționate în cuprinsul prezentei Anexe, cu excepția datelor de identificare ale Avertizorului iar Comitetul Desemnat a solicitat completarea în termen de 15 zile, fără ca această obligație să fie respectată;
- Raportarea este transmisă în mod anonim și nu conține suficiente informații privind încălcările legii pentru a permite examinarea și soluționarea Raportării iar Comitetul Desemnat a solicitat completarea acestuia în termen de 15 zile, fără ca această obligație să fie respectată.

Comitetul Desemnat poate decide închiderea procedurii dacă, după examinarea Raportării, se stabilește că încălcarea este în mod clar minoră și nu necesită alte acțiuni ulterioare decât închiderea procedurii. Se consideră că această dispoziție nu afectează obligația de a păstra confidențialitatea, de a informa Avertizorul și nu afectează alte obligații sau proceduri aplicabile pentru soluționarea încălcării raportate.

Decizia de închidere a cazului este comunicată Avertizorului, cu precizarea temeiului juridic.

Documentația aferentă fiecărei Raportări primite va fi păstrată, cu respectarea cerințelor privind confidențialitatea, pe o perioadă de 5 ani. După expirarea perioadei de păstrare de 5 ani, acestea se distrug, indiferent de suportul pe care sunt păstrate.

Raportările se înscriu într-un registru (denumit în continuare „**Registru**”) care va cuprinde:

- data primirii Raportării;

- first and last name of the Whistleblower;
- the contact details of the Whistleblower;
- the subject of the Report; and
- the method of settlement.

The Company will keep a record of the Reports in the Register in electronic format and is required to maintain statistics on Reports of violations of the law.

In addition, the documentation of the Reports will be carried out under the conditions expressly provided by the Whistleblowers Act.

### **Confidentiality and prohibition of retaliations**

The Company, in encouraging Recipients to promptly report any conduct which may fall within the scope of this Addendum, guarantee the confidentiality of the Report and the information contained therein, as well as the anonymity of the Whistleblower, even in the event that it is subsequently proven to be incorrect or unfounded.

The Company guarantee that the Whistleblower's identity will not be disclosed (except where they give their explicit consent) to anyone who is not a member of staff authorised to receive and follow up on Reports, unless disclosure is a necessary and proportionate obligation under the applicable regulations in the context of investigations by the Authorities or judicial proceedings. In such cases, the Whistleblower must be informed in advance and must receive a written explanation of the reasons for the disclosure. The obligation does not exist if the information would endanger judicial investigations or proceedings.

Information contained in Reports that constitute trade secrets may not be used or disclosed for purposes other than those necessary to settle the Report.

The obligation of confidentiality does not apply if the Whistleblower has intentionally disclosed his/her identity in the context of a public disclosure.

The obligation to maintain confidentiality is maintained even if the Report inadvertently reaches an individual within the Company other than the OF

- numele și prenumele Avertizorului;
- datele de contact ale Avertizorului;
- obiectul Raportării; și
- modalitatea de soluționare.

Societatea va păstra evidența Raportărilor în Registru, în format electronic, având obligația de a menține statistici cu privire la raportările care privesc încălcări ale legii.

De asemenea, documentarea Raportărilor se va efectua în condițiile prevăzute, în mod expres, de către Legea Avertizorilor.

### **Confidențialitate și interzicerea represaliilor**

Societatea încurajează Salariații să raporteze prompt orice comportament care ar putea intra în domeniul de aplicare al prezentei Anexe, garantează confidențialitatea Raportării și a informațiilor conținute în acesta, precum și anonimatul Avertizorului, chiar și în cazul în care se dovedește ulterior că Raportarea este incorectă sau nefondată.

Societatea garantează că identitatea Avertizorului nu va fi dezvăluită (cu excepția cazului în care acesta își dă consimțământul explicit) nimănui care nu este un membru al personalului autorizat să primească și să dea curs Raportărilor, cu excepția cazului în care dezvăluirea este o obligație necesară și proporțională în conformitate cu reglementările aplicabile în contextul unor investigații ale autorităților sau al unor proceduri judiciare. În astfel de cazuri, Avertizorul trebuie să fie informat în prealabil și trebuie să primească o explicație scrisă cu privire la motivele divulgării. Obligația nu subzistă în cazul în care informațiile ar pune în pericol investigațiile sau procedurile judiciare.

Informațiile conținute în Raportări care constituie secrete comerciale nu pot fi utilizate sau divulgate în alte scopuri decât cele necesare pentru soluționarea Raportării.

Obligația de confidențialitate nu se aplică în cazul în care Avertizorul și-a dezvăluit în mod intenționat identitatea în contextul unei dezvăluiri publice.

Obligația de a păstra confidențialitatea este menținută chiar și în cazul în care Raportarea ajunge din greșeală

and/or Designated Committee, case in which the Report shall be forwarded immediately to the OF and/or the Designated Committee.

## Whistleblower Protection

If a Whistleblower acquire information of a wrongdoing in a Work-Related context, he/she shall not be subject to any form of retaliation for reporting such information in good faith through the Company's Whistleblowing channels.

**"Retaliation"** is defined - in accordance with the provisions of the Whistleblowers Act - *as any act or omission, direct or indirect, occurring in a professional context, which is prompted by internal or external reporting or public disclosure and which causes or is likely to cause harm to the whistleblower in the public interest.*

Retaliation, threats of retaliation or attempts at retaliation are particularly aimed to the measures expressly indicated by the provisions of Article 22 of the Whistleblowers Act.

## Remedies and Discipline

Violation of the provisions of this Addendum or of the Whistleblower Act will result in civil, disciplinary, misdemeanor or criminal liability, as applicable.

Reporting information on violations of the law, knowing it to be untrue, constitutes a contravention and may be sanctioned with a fine ranging from RON 2,500 to RON 30,000 if the act has not been committed under such conditions as to be considered, according to the law, an offence.

The sanctions that the Company may apply in the cases mentioned above are those provided for by the Romanian Labour Code.

The Designated Committee shall decide, in consultation with the management of the Company, on the filing of criminal charges or complaints and the disclosure of violations to the appropriate authorities. To the extent that there is no legal obligation to disclose, the Designated Committee shall consider in its decision:

la o persoană din cadrul Societății, alta decât OF și/sau Comitetul Desemnat, caz în care Raportarea va fi transmisă imediat către OF și/sau Comitetul Desemnat.

## Protecția Avertizorului

În cazul în care un Avertizor dobândește informații despre o neregulă într-un context legat de locul de muncă, acesta nu va face obiectul niciunei forme de represalii pentru că a raportat aceste informații cu bună credință prin intermediul canalelor de avertizare ale Societății.

**Represaliile** sunt definite - în acord cu dispozițiile Legii Avertizorilor - *drept orice acțiune sau omisiune, directă sau indirectă, apărută într-un context profesional, care este determinată de raportarea internă sau externă ori de divulgarea publică și care provoacă sau poate provoca prejudicii avertizorului în interes public.*

Represaliile, amenințările cu represalii sau tentativele de represalii se referă, în special, la măsurile indicate expres de dispozițiile Articolului 22 al Legii Avertizorilor.

## Măsuri corective și Disciplină

Încălcarea prevederilor prezentei Anexe sau a Legii Avertizorilor atrage, după caz, răspunderea civilă, disciplinară, contravențională sau penală.

Raportarea de informații privind încălcări ale legii, cunoscând că acestea sunt nereale, constituie contravenție și se sancționează cu amendă de la 2.500 lei (RON) la 30.000 lei (RON), dacă fapta nu a fost săvârșită în astfel de condiții încât să fie considerată, potrivit legii, infracțiune.

Sancțiunile pe care Societatea le poate aplica în cazurile menționate mai sus sunt cele prevăzute de Codul Muncii din România.

Comitetul Desemnat decide, în consultare cu conducerea Societății, cu privire la formularea de acuzații sau plângeri penale și la divulgarea încălcărilor către autoritățile competente. În măsura în care nu există o obligație legală de divulgare, Comitetul Desemnat ia în considerare în decizia sa:

- (a) the interests of the Company or of the HCL Group; and
- (b) the behaviour of the person concerned, in particular their cooperation in the investigation and their willingness to make amends.

### **Communication**

This Addendum remains in effect until repealed or replaced by another addendum.

It shall be amended from time to time and be disclosed on the website of the Company.

- (a) interesul Societății sau al Grupului de companii HCL din care face parte Societatea; și
- (b) comportamentul persoanei în cauză, în special cooperarea acesteia în cadrul anchetei și disponibilitatea sa de a se redresa și de a plăti despăgubiri.

### **Comunicare**

Prezentul addendum rămâne în vigoare până când este abrogat sau înlocuit de un alt addendum.

Documentul va fi modificat periodic și va fi publicat pe site-ul web al Societății.



### Objective

The purpose of this addendum to the Global Whistleblower Policy is to inform employees of HCL Technologies Starschema Kft. (the "Company") about the conditions, procedure and measures for the protection of persons in the Company who submit signals on breaches of Hungarian legislation or acts of the European Union which threaten or harm the public interest and the law of the European Union, as well as the procedure and conditions for the submission and consideration of such signals.

This **Addendum** is prepared in view of the requirements of the Act law no. 361/2022 on the protection of whistleblowers in the public interest of 2023 on Complaints, Public Interest Disclosures and the Rules Related to Reporting of Abuses (the "**Whistleblowing Act**"), implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

In case of any uncertainties, this Addendum should be read and interpreted in line with the Whistleblowing Act. In case of discrepancies between this Addendum and the Global Whistleblower Policy, the provisions of this Addendum shall prevail in relation to employees or other persons in working relations with the Company.

### Scope

This Addendum defines and lays down the process for raising a Signal, the safeguards in place for the person raising a Signal, the roles and responsibilities of relevant stakeholders, and sets the timelines for processes to be followed.

### Cél

A Globális Visszaélés-bejelentési Szabályzat jelen kiegészítésének az a célja, hogy tájékoztatást nyújtson a HCL Technologies Starschema Kft. (a „**Társaság**”) munkavállalói részére azokról a feltételekről, eljárásrendekről és intézkedésekről, amelyek azon személyekre vonatkoznak, akik bejelentést tesznek magyar jogszabályi előírások megsértéséről vagy Európai Unió jogszabályi előírások olyan megsértéséről, ami fenyegeti vagy sérti a közérdeket, továbbá az ilyen bejelentések benyújtására és kezelésére vonatkozó eljárásokról és feltételekről.

Ez a kiegészítés a panaszokról, a közérdekű bejelentésekről és a visszaélések bejelentésével kapcsolatos szabályokról szóló 2023. évi 361/2022. számú törvény (a továbbiakban: "bejelentési törvény"), az uniós jog megsértését bejelentő személyek védelméről szóló, 2019. október 23-i (EU) 2019/1937 európai parlamenti és tanácsi irányelvet végrehajtó törvény követelményeire tekintettel készült.

Bármely bizonytalanság esetén a jelen Kiegészítést a Visszaélés-bejelentési Törvénnyel összhangban kell olvasni és értelmezni. A jelen Kiegészítés és a Globális Visszaélés-bejelentési Szabályzat közötti eltérés esetén a Társasággal munkaviszonyban vagy egyéb munkavégzésre irányuló jogviszonyban álló személyek tekintetében a jelen Kiegészítés rendelkezései alkalmazandók.

### Hatály

A jelen Kiegészítés meghatározza a Bejelentések benyújtásával kapcsolatos eljárásrendre, a Bejelentést benyújtó személyek védelmére, az érintett személyek szerepére és felelősségeire, továbbá az eljárásokban betartandó határidőkre vonatkozó szabályokat. Minden esetben a Társaság dönti el azt – a Visszaélés-

In all instances, the Company determines when circumstances warrant an investigation and the appropriate investigative process to be employed, in conformity with the Whistleblowing Act.

Signals may be made in connection with actions and omissions that are unlawful or suspected to be unlawful, and in connection with other abuses.

**NB! The Company has no obligation to investigate anonymous tips.** Signals outside the scope of this Addendum (e.g., anonymous tips) may be reviewed, but the Company retains the prerogative to respond and investigate on its own terms. Persons who submit such signals may not be entitled to the level of protection prescribed by the Whistleblowing Act.

#### Applicability

This Addendum covers persons who have a contractual undertaking with the Company, including all directors, officers, employees, third party vendors, consultants that becomes aware of a Breach in working context.

#### Definitions

- **Whistleblower:** A person making a disclosure of actions and omissions that are unlawful or suspected to be unlawful, and in connection with other abuses. Whistleblower is someone who has a contractual relationship in relation to employment with the Company.
- **Signal:** The reporting of a Breach within the scope of the Whistleblowing Act;
- **Designated Officer:** The person designated by the Company for responding to the received Signals;

bejelentési Törvénynek megfelelően –, hogy az adott körülmények között indokolt-e a kivizsgálás és hogy annak mi a megfelelő lebonyolítása.

Jogellenes vagy jogellenesnek feltételezett cselekményre vagy mulasztásra, illetve egyéb visszaélésre vonatkozóan lehet Bejelentést tenni.

**NB! A Társaság nem köteles kivizsgálni a névtelenül megtett bejelentéseket.** A jelen Kiegészítés hatályán kívül eső bejelentések (pl. a névtelenül megtett bejelentések) kivizsgálhatók, azonban a Társaság fenntartja a jogot, hogy a válaszadást és a kivizsgálást a saját maga által meghatározott feltételek szerint intézze. Az ilyen bejelentést benyújtó személyeket adott esetben nem illeti meg a Visszaélés-bejelentési Törvényben foglaltak szerinti védelem.

#### Alkalmazandóság

A jelen Kiegészítés alkalmazandó minden olyan személyre, aki szerződéses jogviszonyban áll a Társasággal, ideértve mindazokat a vezető tisztségviselőket, tisztviselőket, munkavállalókat, harmadik személy kereskedőket és tanácsadókat, akik munkavégzéssel összefüggésben Jogsértésről szereznek tudomást.

#### Meghatározások

- **Bejelentő:** olyan személy, aki jogellenes vagy jogellenesnek feltételezett cselekményről vagy mulasztásról, illetve egyéb visszaélésről bejelentést tesz. A Bejelentő olyan személy, aki szerződéses jogviszonyban áll a Társasággal;
- **Bejelentés:** a Visszaélés-bejelentési Törvény hatálya alá tartozó Jogsértés bejelentése;
- **Kijelölt Tisztviselő:** a Társaság által a kézhez vett Bejelentések megválaszolására kijelölt személy;

- **Company:** HCL Technologies Starschema Kft.;
- **Whistleblowing Act:** LAW no. 361/2022 on the protection of whistleblowers in the public interest of 2023 on Complaints, Public Interest Disclosures and the Rules Related to Reporting of Abuses
- **Breach:** An action or omission that is unlawful or suspected to be unlawful, and other abuses.
- **Társaság:** a HCL Technologies Starschema Kft.;
- **Visszaélés-bejelentési Törvény:** a közérdekű bejelentők védelméről szóló 2023. évi 361/2022. számú törvény, a panaszokról, a közérdekű bejelentésekről és a visszaélések bejelentésével kapcsolatos szabályokról.
- **Jogsértés:** jogellenes vagy jogellenesnek feltételezett cselekmény vagy mulasztás, illetve egyéb visszaélés.

### Reporting a Signal

Signals regarding Breaches are encouraged to be made submitted in writing (in the Form provided as Annexure 1 to this Addendum) so as to assure a clear understanding of the issues.

Such Signal reports should be factual rather than speculative and must contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of investigative procedures.

The Company is entitled to refrain from investigating Signals made anonymously, or by persons who are not entitled to make a Signal, or if the contents of the Signal are identical with the contents of an earlier Signal made by the same person, or if the violation of public interest or significant private interest would be disproportionate to the restriction of rights – arising from the investigation of the Signal – of the person or entity concerned by the Signal, or if it becomes obvious that the whistleblower has provided wrong data or information in bad faith.

### Disqualification of Signals from Review

Anonymous Signals does not fall under the scope of this Addendum and persons reporting anonymously will not be entitled to the level of protection prescribed by the Whistleblowing Act.

### Bejelentés a Jogsértésről

Az ügy világos megérthetősége érdekében arra ösztönözzük, hogy a Bejelentést írásban tegye meg (a jelen Kiegészítés 1. Melléklete szerinti Formanyomtatványon). A Bejelentésnek tényszerűnek kell lennie, nem pedig spekulatívnak, és a lehető legkonkrétabb információkat kell tartalmaznia annak érdekében, hogy lehetővé tegye a kivizsgálási eljárás természetének, tartalmának és sürgősségének megítélését. A Társaság jogosult arra, hogy mellőzze a Bejelentés kivizsgálását, ha azt azonosíthatatlan bejelentő tette meg, vagy bejelentés megtételére nem jogosult személy tette meg, vagy ha a bejelentés tartalma azonos az ugyanazon Bejelentő által megtett korábbi bejelentéssel, vagy ha a közérdek vagy nyomós magánérdek sérelme a bejelentésben érintett természetes személy vagy jogi személy jogainak a bejelentés kivizsgálásából eredő korlátozásával nem állna arányban.

### Bejelentések kizárása a kivizsgálásból

A névtelenül megtett Bejelentések nem tartoznak a jelen Kiegészítés hatálya alá, és a névtelen bejelentőt nem illeti meg olyan szintű védelem, mint amit a Visszaélés-bejelentési Törvény biztosít.

The Designated Officer may also, upon his/her discretion and based on the available information choose not to investigate the Signal where:

- a) the offence reported is minor and does not require further follow-up action;
- b) the Signal is repeating, i.e., it has been received before, and it does not contain new information relevant to a Breach in respect of which an investigation has already been completed, unless new legal or factual circumstances warrant further action;
- c) Signals made Anonymously.
- d) Signals that contain manifestly false or misleading statements of facts are returned with instructions to the Whistleblower to rectify the statements. The Whistleblower will also be notified that he/she may also bear liability for any false accusations made.

#### **Procedure to Submit a Signal**

The Signal can be made in any of the following methods:

**Written Signal:** A written Signal (preferably in the Form provided as Annexure 1 to this Addendum) can be sent to the following address:

HCL Technologies Starschema Kft,  
H-1143 Budapest,  
Stefánia u. 101-103 Hungary

**Email:** A Signal (preferably in the Form provided as Annexure 1 to this Addendum) can be sent via email to the Designated Officer at Balint Kocsis [balint.kocsis@hcl.com](mailto:balint.kocsis@hcl.com)

**Convercent Platform:** A Signal can be submitted through the Convercent Platform. Accessing the Platform is done through Path:

A Kijelölt Tisztviselő a rendelkezésére álló információk alapján, saját belátása szerint dönthet úgy, hogy mellőzi a Bejelentés kivizsgálását, ha:

- a) a bejelentett szabálytalanság kis jelentőségű és nem igényel további intézkedést;
- b) a Bejelentés ismételt, azaz már korábban is kézhezvételre került, és nem tartalmaz új információt olyan Jogsértés vonatkozásában, amelynek a kivizsgálása már befejeződött, kivéve, ha új jogi vagy ténybeli körülmények további intézkedést indokolnak;
- c) a Bejelentést névtelenül tették meg.

A nyilvánvalóan hamis vagy félrevezető tényállításokat tartalmazó Bejelentések visszaküldésre kerülnek azzal a kéréssel, hogy a Bejelentő helyesbítse az állításokat. A Bejelentő tájékoztatásra kerül arról is, hogy hamis állítások megtételéért felelősség terhelheti.

#### **A Bejelentés benyújtásának eljárásrendje**

Bejelentéseket az alábbi módok bármelyikén lehet benyújtani:

Írásbeli Bejelentés: az írásbeli Bejelentést (lehetőség szerint a jelen Kiegészítés 1. Mellékletét képező Formanyomtatvány felhasználásával) a következő -mail-címre kell küldeni: [●].

HCL Technologies Starschema Kft,  
H-1143 Budapest,  
Stefánia u. 101-103 Hungary

**E-mail:** a Bejelentés benyújtható e-mailben (lehetőség szerint a jelen Kiegészítés 1. Mellékletét képező Formanyomtatvány felhasználásával) a Kijelölt Tisztviselő részére az [Balint Kocsis [balint.kocsis@hcl.com](mailto:balint.kocsis@hcl.com)] e-mail-címre küldött e-maillal.

**Convercent Platform:** A jelzés a Convercent Platformon keresztül nyújtható be. A

**Orally:** A Signal can be also submitted orally by contacting the Designated Officer or through a meeting. The contents of the Signal will be written down by the Designated Officer, and a copy of the document will be provided to the Whistleblower together with giving the Whistleblower the opportunity to check, correct, and accept the document by signature.

**Szóban:** a Bejelentést a Kijelölt Tisztviselőnél szóban is meg lehet tenni. A Bejelentés tartalmát a Kijelölt Tisztviselő írásban rögzíti, a dokumentum másolatát átadja a Bejelentő részére, és egyúttal lehetőséget biztosít annak ellenőrzésére, helyesbítésére és aláírással történő elfogadására.

### **Procedure of Investigation**

After submitting a Signal, the Whistleblower will receive an acknowledgment of receipt within 7-days.

The Designated Officer will provide information to the Whistleblower on the action taken in relation to the Signal within no more than three months of the date of acknowledgment of receipt.

In case the Signal also points to a specific person associated with the alleged Breach, the Designated Officer will also provide that person with all the evidence gathered and give them the opportunity to object it within 7 days, while still ensuring the Whistleblower's protection. If more information and/or evidence relating to the Signal are necessary, the Designated Officer may require them either from the Whistleblower, a person associated with the reported Breach, or a third party.

### **A kivizsgálás eljárásrendje**

A Bejelentés benyújtását követően a Bejelentő – a Bejelentés kézhezvételétől számított 7 napon belül – igazolást kap a Bejelentés kézhezvételéről.

A Kijelölt Tisztviselő legkésőbb a kézhezvételi igazolás keltétől számított három hónapon belül tájékoztatja a Bejelentőt a Bejelentéssel összefüggésben megtett intézkedésről.

Ha a Bejelentés meghatározott személyre is utal az állított Jogsértéssel kapcsolatban, akkor a Kijelölt Tisztviselő minden összegyűjtött bizonyítékot átad ezen személy részére, és lehetőséget biztosít arra, hogy a kifogásait 7 napon belül előterjessze, mindeközben továbbra is biztosítja a Bejelentő védelmét. Ha a Bejelentéssel összefüggésben további információ és/vagy bizonyíték szükséges, akkor a Kijelölt Tisztviselő ezek rendelkezésre bocsátását kérheti akár a Bejelentőtől, akár attól a személytől, akire utaltak a bejelentett Jogsértéssel kapcsolatban, akár harmadik személytől.

### **Roles and Responsibilities**

Whistleblower:

- The Whistleblower provides the Signal, which is the initial information related to a reasonable belief that a Breach has occurred;

### **Szerepek és felelőségek**

Bejelentő:

- a Bejelentő benyújtja a Bejelentést, ami a Jogsértés bekövetkezésére vonatkozó indokolt meggyőződéssel kapcsolatos első információ;

- The Whistleblower must provide all factual corroborating evidence, as is available to him
- The Whistleblower is not liable for the acquisition of, or access to, the information reported or made public, provided that such acquisition or access does not constitute a crime.
- The Whistleblower is not liable for a violation of any restriction on disclosure of information imposed by contract, law, secondary legislation or administrative act, provided that the Whistleblower has reasonable grounds to believe that the filing of the Signal or the public disclosure of the information was necessary to disclose the violation.
- a Bejelentő köteles minden számára hozzáférhető, a tényállításait alátámasztó bizonyítékot rendelkezésre bocsátani;
- a Bejelentőt nem terheli felelősség a bejelentett és/vagy nyilvánosságra hozott információk megszerzéséért illetve hozzáférhetővé tételéért, feltéve, hogy a megszerzés illetve a hozzáférhetővé tétel nem minősül bűncselekménynek;
- a Bejelentőt nem terheli felelősség a valamely szerződés, jogszabály vagy más előírás szerinti nyilvánosságra hozatali korlátozás megsértéséért, feltéve, hogy a Bejelentő alapos okkal feltételezte, hogy a Bejelentés benyújtása illetve az információ nyilvánosságra hozatala szükséges volt a szabálytalanság feltárása érdekében.

#### Designated Officer:

- Receives Signals;
- Acknowledges receipt of Signals;
- Informs persons if they are associated with an alleged Breach;
- Prepares Signals reports;
- Maintains the Company's register of Signals;
- Ensures that the identity of the Whistleblower and any other person mentioned in the Signal is properly protected and takes the necessary measures to restrict access to the Signal by unauthorised persons.

#### Kijelölt Tisztviselő:

- Kézhez veszi a Bejelentéseket;
- Elismeri a Bejelentések kézhezvételét;
- Ha az állított Jogsértés bizonyos személyekre is vonatkozik, akkor őket tájékoztatja;
- Előkészíti a Bejelentésről készített jelentést;
- Fenntartja a Társaságnak a Bejelentésekkel kapcsolatos nyilvántartását;
- Biztosítja, hogy a Bejelentő és a Bejelentésben említett bármely más személy személyazonossága megfelelő védelemben részesüljön és megteszi a szükséges intézkedéseket a Bejelentéshez az arra nem jogosult személyek általi hozzáférés korlátozása érdekében.

### Whistleblower Protection

The Whistleblower receives protection provided that:

- there was a reasonable cause to believe that the information submitted about the Breach was correct at the time it was submitted and that such

### Bejelentővédelem

A Bejelentő védelemben részesül, feltéve, hogy:

- alapos okkal feltételezte azt, hogy a Jogsértésről benyújtott információk a benyújtás időpontjában helytállóak voltak, és hogy ezek az információk a

information falls within the scope of the Whistleblowing Act;

- the Signal was reported in accordance with the terms and conditions of the Whistleblowing Act.

The Company will ensure to protect Whistleblowers against retaliation, as described below:

- The Company prohibits retaliation against a Whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). This protection from retaliation is not intended to prohibit managers or supervisors from acting, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

In the following cases, the Whistleblower shall not be entitled to the protection provided for in the Whistleblowing Act:

- by the Signal, the Whistleblower violates the rules on protection of classified information;
- Divulging unrelated information under the guise of a report.
- during the submission of the Signal, the Whistleblower fails to comply with the confidentiality obligations set out in acts regarding medical confidentiality or attorney-client privilege;
- during the submission of the Signal, the Whistleblower fails to comply with the confidentiality obligations that apply as a result of his/her profession as an ecclesiastical person or as a person carrying out religious rites as a profession at a religious association;

Visszaélés-bejelentési Törvény hatálya alá tartoznak;

- a Bejelentés megtételére a Visszaélés-bejelentési Törvény rendelkezéseinek megfelelően került sor.

A Társaság az alábbiak szerint biztosítani fogja, hogy a Bejelentők védelemben részesüljenek a hátrányos intézkedésekkel szemben:

- A Társaság megtilt minden olyan, a Bejelentő számára hátrányos intézkedést, amelynek célja vagy hatása a munkafeltételek hátrányos megváltoztatása (ideértve, de nem kizárólagosan, a fizikai sérelemmel, a munkaviszony megszűnésével, a büntető jellegű utasításokkal, vagy a munka díjazásának megváltoztatásával kapcsolatos fenyegetést). A hátrányos intézkedések elleni védelem biztosításának nem célja, hogy megtiltsa a vezetők és felettesek számára, hogy a szokásos feladatkörükben eljárva és helytálló, teljesítménnyel kapcsolatos szempontok alapján intézkedjenek, ideértve a hátrányos jogkövetkezmények alkalmazását is.

Az alábbi esetekben a Bejelentőt nem illeti meg a Visszaélés-bejelentési Törvény szerinti védelem:

- ha bejelentésével a minősített adatok védelmére vonatkozó szabályokat megszegi,
- a bejelentés megtétele során törvényben meghatározott, az orvosi titokra, az ügyvédi titokra vonatkozó titoktartási kötelezettségének nem tesz eleget,
- a bejelentés megtétele során az egyházi személy és a vallási egyesület vallásos szertartást hivatásszerűen végző tagjaként a hivatásánál fogva rá irányadó titoktartási kötelezettségének nem tesz eleget,

- during the submission of the Signal, the Whistleblower violates the rules applicable to the secrets protected by acts in connection with judicial practice;
- by the Signal, the Whistleblower violates the data controlling rules set out in criminal proceedings legislation;
- by the Signal, the Whistleblower, as a member of the law enforcement authorities, the Military National Security Service or the National Tax and Customs Administration, violates the rules set out in legislation as applicable to the operation of these organizations.
- a bejelentés megtétele során a bírói ítélezéssel kapcsolatban a törvény által védett titok védelmére vonatkozó szabályokat megszegi,
- bejelentésével a büntetőeljárás szabályok szerinti adatkezelési szabályokat megszegi, vagy
- a rendvédelmi szervek, a Katonai Nemzetbiztonsági Szolgálat, illetve a Nemzeti Adó- és Vámhivatal állományának a tagjaként a bejelentésével az e szervek tevékenységére vonatkozó, jogszabályban meghatározott szabályokat megszegi.

### External Reporting of Signals

Notwithstanding the possibility to submit a Signal for a Breach to the Designated Officer of the Company, signals about Breaches may be also submitted to state authorities, local authorities, and also via the protected electronic system of public interest disclosures (in Hungarian: *"közérdekű bejelentések védett elektronikus rendszere"*). More information about the exact procedure to be followed can be found in the Whistleblowing Act and at the website of the Office of the Commissioner for Fundamental Rights:

<https://www.ajbh.hu/web/guest/tajekoztato>.

Submitting a Signal to the Company does not prevent Whistleblowers from reporting Signals externally as well and vice versa.

### Confidentiality and Personal Data Protection

The Company will take appropriate and reasonable measures to protect information relating to whistleblowing and to protect the identity of Whistleblowers by ensuring that access to the information is restricted to the employees who need the data to perform their duties.

Any processing of personal data, including the exchange or transfer of personal data by

### A Bejelentések külső megtétele

Mindamelllett, hogy lehetőség van a Jogsértésre vonatkozó Bejelentéseknek a Kijelölt Tisztviselő részére történő benyújtásra, bejelentés tehető az állami szervek és a helyi önkormányzati szervek részére, továbbá a közérdekű adatkezelések védett elektronikus rendszerén keresztül is. A pontos eljárásrendről további információ található a Visszaélés-bejelentési Törvényben, valamint az Alapvető Jogok Biztosának Hivatala honlapján: <https://www.ajbh.hu/web/guest/tajekoztato>.

Valamely Bejelentésnek a Társaság részére történő benyújtása nem akadályozza a Bejelentőt abban, hogy a Bejelentést külső csatornán keresztül is megtegye, és fordítva.

### Titoktartás és a személyes adatok védelme

A Társaság – azzal, hogy az információkhoz csak azok a munkavállalók férhetnek hozzá, akiknek az adatokra a kötelezettségeik teljesítéséhez szükségük van – megteszi a megfelelő intézkedéseket a bejelentéssel összefüggő információknak és a Bejelentő személyazonosságának védelme érdekében, A személyes adatokat – ideértve a személyes adatoknak a hatáskörrel rendelkező



competent authorities, shall be carried out in accordance with the relevant provisions of the Whistleblowing Act, Regulation (EU) 2016/679 and Directive (EU) 2016/680, and, where the transfer involves institutions, bodies, offices or agencies of the European Union, in accordance with Regulation (EU) 2018/1725, as well as Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

No personal data that is manifestly irrelevant to the examination of the specific Signal will be processed and, if collected incidentally, shall be deleted without any delay.

The privacy notice about the details of the data processing activities relating to whistleblowing is available within the Convercent Platform and via the following link: [Privacy Notice and Policy | OneTrust](#)

#### Amendments

The Company undertakes to review its internal whistleblowing procedure at least once every three years.

#### Communication

This Addendum as amended from time to time shall be disclosed and clearly communicated to all employees of the Company.

hatóságokkal történő kicserélését és a személyes adatoknak a hatáskörrel rendelkező hatóságok általi átadását is – a Visszaélés-bejelentési Törvény vonatkozó rendelkezéseinek, a 2016/679 (EU) Rendeletnek és a 2016/680 (EU) Irányelvnek megfelelően kell kezelni, ha pedig az átadásban az Európai Unió intézményei, testületei, hivatalai vagy ügynökei is részt vesznek, akkor a 2018/1725 (EU) Rendeletnek és az információs önrendelkezési jogról és az információszabadságról szóló 2011. évi CXII. törvénynek is megfelelően.

Az adott Bejelentés kivizsgálásával kapcsolatban nyilvánvalóan nem releváns személyes adat nem kerül kezelésre, ha pedig ilyen adatot véletlenszerűen mégis összegyűjtenek, akkor az adat késedelem nélkül törlésre kerül.

A visszaélés-bejelentéssel összefüggő adatvédelmi tevékenységek részleteire vonatkozó adatvédelmi tájékoztató elérhető a Convercent Platformon belül és a következő linken: [Privacy Notice and Policy | OneTrust](#)

#### Módosítások

A Társaság vállalja, hogy a belső visszaélés-bejelentési eljárásrendjét legalább három évente egyszer felülvizsgálja.

#### Kommunikáció

A jelen Kiegészítést – ahogyan az időről időre módosul – közzé kell tenni és világosan közölni kell a Társaság munkavállalói részére.

### Annexure 1: Form for submitting a Signal:

### Melléklet: Formanyomtatvány a Bejelentés megtételéhez

Form for submitting a Signal	Formanyomtatvány a Bejelentés megtételéhez
<i>For the Designated Officer:</i>	<i>A Kijelölt Tisztviselő részére:</i>
Unique Identification Number: _____	Egyedi Azonosító Szám: _____
Date: _____	Dátum: _____
Form of submission ( <i>written/ oral/personally/through a proxy</i> ):	A benyújtás formája ( <i>írásbeli / szóbeli / személyes / meghatalmazott útján</i> ):

\_\_\_\_\_

*Details of the Designated Officer:*

Name: \_\_\_\_\_

Position: \_\_\_\_\_

**Part I. Details of the Whistleblower**

Name: \_\_\_\_\_

*Contact details*

Region: \_\_\_\_\_

City: \_\_\_\_\_

Correspondence address: \_\_\_\_\_

\_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**Part II. Details of the person against whom the Signal is lodged**

Name: \_\_\_\_\_

**Part III. Details of the breach**

The breach relates to:

\_\_\_\_\_

Date/period of the breach:

\_\_\_\_\_

Description of the breach:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Description of the attached evidence:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

A Kijelölt Tisztviselő adatai:

Név: \_\_\_\_\_

Munkakör: \_\_\_\_\_

**I. rész A Bejelentő adatai:**

Név: \_\_\_\_\_

*Elérhetőség*

Vármegye: \_\_\_\_\_

Település: \_\_\_\_\_

Levelezési cím: \_\_\_\_\_

\_\_\_\_\_

Telefonszám: \_\_\_\_\_

E-mail-cím: \_\_\_\_\_

**II. rész Annak a személynek az adatai, akivel szemben a Bejelentés előterjesztésre kerül**

Név: \_\_\_\_\_

**III. rész A jogsértés részletei**

A jogsértés az alábbiakkal kapcsolatos:

\_\_\_\_\_

A jogsértés időpontja / időtartama:

\_\_\_\_\_

A jogsértés leírása:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

A csatolt bizonyítékok leírása:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Part IV. Persons other than the Whistleblower to whom protection should be given**

Capacity of the person: \_\_\_\_\_

Name: \_\_\_\_\_

*Contact details*

City: \_\_\_\_\_

Correspondence address: \_\_\_\_\_  
\_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**Part V. Persons who can confirm the reported data or provide additional information**

Name: \_\_\_\_\_

*Contact details*

City: \_\_\_\_\_

Correspondence address: \_\_\_\_\_  
\_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**IV. rész Azok a – Bejelentőn kívüli – személyek, akiknek védelemben kellene részesülniük**

Foglalkozás: \_\_\_\_\_

Név: \_\_\_\_\_

*Elérhetőség*

Település: \_\_\_\_\_

Levelezési cím: \_\_\_\_\_  
\_\_\_\_\_

Telefonszám: \_\_\_\_\_

E-mail-cím: \_\_\_\_\_

**V. rész Azok a személyek, akik meg tudják erősíteni a bejelentett adatokat és egyéb információkat**

Név: \_\_\_\_\_

*Elérhetőség*

Település: \_\_\_\_\_

Levelezési cím: \_\_\_\_\_  
\_\_\_\_\_

Telefonszám: \_\_\_\_\_

E-mail-cím: \_\_\_\_\_

*For the Designated Officer / A Kijelölt Tisztviselő részéről*

\_\_\_\_\_  
Date / Dátum

\_\_\_\_\_  
Name / Név

\_\_\_\_\_  
Position / Munkakör

---

Signature / Aláírás

*For the Whistleblower / A Bejelentő részéről*

---

Date / Dátum

---

Name / Név

---

Signature / Aláírás

### Bulgaria addendum

#### Objective

The purpose of this addendum to the Global Whistleblower Policy is to inform employees of “**HCL TECHNOLOGIES Bulgaria EOOD**” and “**C3i Europe EOOD**” (the “**Company**”) about the conditions, procedure and measures for the protection of persons in the Company who submit signals on breaches of Bulgarian legislation or acts of the European Union which threaten or harm the public interest and the law of the European Union, as well as the procedure and conditions for the submission and consideration of such signals.

This **Addendum** is prepared in view of the requirements of the Act on protection of persons who report breaches or publicly disclose information on breaches (the “**Whistleblowing Act**”), implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

In case of any uncertainties, this Addendum should be read and interpreted in line with the Whistleblowing Act. In case of discrepancies between this Addendum and the Global Whistleblower Policy, the provisions of this Addendum shall prevail in relation to employees or other persons in working relations with the Company.

#### Scope

This Addendum defines and lays down the process for raising a Signal, the safeguards in place for the person raising a Signal, the roles and responsibilities of relevant stakeholders, and sets the timelines for processes to be followed. In all instances, the Company determines when circumstances warrant an investigation and the appropriate investigative process to be employed, in conformity with the Whistleblowing Act.

Only Signals related to Breaches within the scope of this Addendum will be dealt by this Addendum. A list of Breaches within the scope of this Addendum is provided in **Annexure 1**.

### Допълнение за България

#### Цел

Целта на настоящото допълнение към Глобалната политика за лицата, подаващи сигнали е да информира служителите на „ЕйчСиЕл Технолоджис България ЕООД” и “Си три ай Европа ЕООД” („**Дружеството**”) за условията, реда и мерките за защита на лицата в Дружеството, които подават сигнали за нарушения на българското законодателство или актове на Европейския съюз, които застрашават или увреждат обществен интерес и правото на Европейския съюз, както и за реда и условията за подаване и разглеждане на такива сигнали.

Настоящото **Допълнение** е изготвено с оглед на изискванията на Закона за защита на лицата, подаващи сигнали или публично оповестяващи информация за нарушения („**Закон за подаване на сигнали за нарушения**”), с който се въвежда Директива (ЕС) 2019/1937 на Европейския парламент и на Съвета от 23 октомври 2019 г. относно защитата на лицата, които съобщават за нарушения на правото на Съюза.

В случай на неясноти настоящото Допълнение следва да се чете и тълкува в съответствие със Закона за подаване на сигнали за нарушения. В случай на противоречия между настоящото Допълнение и Глобалната политика за лицата, подаващи сигнали за нарушения, разпоредбите на настоящото Допълнение имат предимство по отношение на служители или други лица в работни отношения с Дружеството.

#### Обхват

В настоящото Допълнение се определят и уреждат процесът на подаване на Сигнал, мерките за осигуряване на защита за лицето, което подава Сигнала, ролите и отговорностите на съответните заинтересовани страни и се определят сроковете за процесите. Във всички случаи Дружеството определя кога обстоятелствата налагат разследване и подходящия процес на разследване, който трябва да се използва, в съответствие със Закона за подаване на сигнали за нарушения.

Само Сигнали, свързани с Нарушения, попадащи в обхвата на настоящото Допълнение, ще бъдат разглеждани от съгласно настоящото Допълнение. Списък на Нарушенията, попадащи в обхвата на настоящото Допълнение, е представен в **Приложение 1**.

**NB!** Signals outside the scope of this Addendum (e.g. anonymous Signals) may be reviewed pursuant to the Global Whistleblower Policy, but the Company retains the prerogative to respond and investigate on its own terms. Persons who submit such signals may not be entitled to the level of protection prescribed by the Whistleblowing Act.

### Applicability

This Addendum covers all directors, officers, employees, third party vendors, consultants and any person that becomes aware of a Breach in working context.

### Definitions

- **Whistleblower:** A person making a disclosure of any actual or suspected Breach that they have observed or have knowledge of. Whistleblowers could be directors, employees, contractors, contractor's employees, clients, vendors, internal or external auditors, or other third parties;
- **Signal:** The reporting of a Breach within the Scope of the Whistleblowing Act;
- **Designated Officer:** The person designated by the Company for responding to the received Signals;
- **Company:** "HCL TECHNOLOGIES Bulgaria EOOD" and "C3i Europe EOOD"
- **Whistleblowing Act:** Act on protection of persons who report breaches or publicly disclose information on Breaches (in Bulgarian: „Закон за защита на лицата, подаващи сигнали или публично оповестяващи информация за нарушения“);
- **Breach:** A breach of Bulgarian legislation or acts of the European Union which threaten or harm the public interest and of the law of the European Union as further detailed in the Whistleblowing Act and Annexure 1 to this Addendum.

**NB!** Сигналите извън обхвата на настоящото Допълнение (напр. анонимни сигнали) могат да бъдат разгледани съгласно Глобалната политика за лицата, подаващи сигнали за нарушения, но Дружеството си запазва правото да реагира и разследва при свои собствени условия. Лицата, които подават такива сигнали, може да имат право на нивото на защита, предвидено в Закона за подаване на сигнали за нарушения.

### Приложимост

Настоящото Допълнение обхваща всички директори, служители, трети страни доставчици, консултанти и всяко лице, което узнае за Нарушение в работен контекст.

### Дефиниции

- **Лице, подаващо сигнал:** Лице, което разкрива действителни или предполагаеми нарушения, които е забелязало или за които знае. Лица, подаващи сигнали за нарушения, могат да бъдат директори, служители, изпълнители, служители на изпълнители, клиенти, доставчици, вътрешни или външни одитори или други трети страни;
- **Сигнал:** Сигнал за Нарушение, попадащо в обхвата на Закона за подаване на сигнали за нарушения;
- **Служител, отговарящ за разглеждане на сигнали:** Лицето, определено от Дружеството да отговаря на получените Сигнали;
- **Дружество:** "ЕйчСиЕл Технолоджис България EOOD" и "Си три ай Европа EOOD"
- **Закон за подаване на сигнали за нарушения:** Закон за защита на лицата, подаващи сигнали или публично оповестяващи информация за нарушения;
- **Нарушение:** Нарушение на българското законодателство или на актове на Европейския съюз, което застрашава или уврежда обществен интерес и на правото на Европейския съюз, както е описано по-подробно в Закона за подаване на сигнали за

нарушения и в Приложение 1 към настоящото Допълнение.

## Reporting a Signal

Signals regarding suspected Breaches are encouraged to be made submitted in writing (in the Form provided as Annexure 2 to this Addendum) so as to assure a clear understanding of the issues. Such Signal reports should be factual rather than speculative and must contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of investigative procedures. The Signal must include the Whistleblower's identity and cannot be made anonymously.

## Disqualification of Signals from Review

Signals relating to Breaches that have occurred more than 2 years ago shall not be reviewed.

Anonymous Signals does not fall under the scope of this Addendum and person reporting anonymously will not be entitled to the level of protection prescribed by the Whistleblowing Act.

The Designated Officer may also, upon his/her discretion and based on the available information choose not to investigate the Signal where:

- b) the offence reported is minor and does not require further follow-up action;
- e) the Signal is repeating, i.e., it has been received before, and it does not contain new information relevant to a Breach in respect of which an investigation has already been completed, unless new legal or factual circumstances warrant further action;

Signals that contain manifestly false or misleading statements of facts are returned with instructions to the Whistleblower to rectify the statements. The Whistleblower will also be notified that he/she may also bear liability for any false accusations made.

## Procedure to Submit a Signal

## Подаване на Сигнал

Насърчава се Сигналите за предполагаеми Нарушения да се подават в писмен вид (във формуляра, предоставен като Приложение 2 към настоящото Допълнение), за да се гарантира ясно разбиране на проблемите. Докладваните Сигнали трябва да бъдат по-скоро фактологични, отколкото спекулативни, и трябва да съдържат възможно най-много конкретна информация, за да се даде възможност за правилна оценка на естеството, степента и спешността на процедурите за разследване. Сигналът трябва да включва самоличността на Лицето, подаващо сигнала и не може да бъде подаден анонимно.

## Сигнали, които не се разглеждат

Сигнали, свързани с Нарушения, които са извършени преди повече от две години, не се разглеждат.

Анонимните сигнали не попадат в обхвата на настоящото Допълнение и лицето, което подава анонимни сигнали, няма да има право на нивото на защита, предписано от Закона за подаване на сигнали за нарушения.

Служителят, отговарящ за разглеждането на сигнали, може също така по своя преценка и въз основа на наличната информация да реши да не разследва сигнала, когато:

- d) когато нарушението, за което е подаден Сигналът, е маловажен случай и не налага предприемането на допълнителни последващи действия;
- e) по повтарящ се Сигнал, който не съдържа нова информация от съществено значение за Нарушение, по отношение на което вече има приключила проверка, освен ако нови правни или фактически обстоятелства не дават основание за предприемането на последващи действия;

Сигналите, които съдържат явно неверни или подвеждащи твърдения за факти, се връщат с указания към подателя на Сигнала да ги коригира. Подателят на Сигнала ще бъде уведомен, че може да понесе отговорност за неверни обвинения.

## Процедура за подаване на Сигнал

The Signal can be made in any of the following methods:

**Written Signal:** A written Signal (preferably in the Form provided as Annexure 2 to this Addendum) can be sent to the following address: [

C3i Europe EOOD / HCL Technologies Bulgaria  
EOOD  
Business Park Sofia, bld 7B, fl.1  
Sofia 1766, Bulgaria

**Email:** A Signal (preferably in the Form provided as Annexure 2 to this Addendum) can be sent via email to the Designated Officer at [iva.petrova@hcl.com](mailto:iva.petrova@hcl.com)

**Orally:** A Signal can be also submitted orally by contacting the Designated Officer. The contents of the Signal will be written down by the Designated Officer.

If the submitted Signal does not contain the required details, a notice shall be sent to the Whistleblower to remedy the irregularities within 7 days of receipt of the Signal. If the irregularities are not remedied within that period, the Signal form shall be returned to the Whistleblower together with all attached documents, if any, and the Signal will not be reviewed.

### Procedure of Investigation

After submitting a Signal, the Whistleblower will receive an acknowledgment of receipt within 7-days.

The Designated Officer will provide information to the Whistleblower on the action taken in relation to the Signal within no more than three months of the date of acknowledgment of receipt.

In case the Signal also points to a specific person associated with the alleged Breach, the Designated Officer will also provide that person with all the evidence gathered and give them the opportunity to object it within 7 days, while still ensuring the Whistleblower's protection. If more information and/or evidence relating to the Signal are necessary, the Designated Officer may require them either from

Сигнал може да бъде подаден по всеки един от следните начини:

**Писмен Сигнал:** Писмен сигнал (за предпочитане във Формата, предоставена като Приложение 2 към настоящото Допълнение) може да бъде изпратен на следния адрес:

C3i Europe EOOD / HCL Technologies Bulgaria EOOD  
Бизнес парк София, бл. 7Б, ет. 1  
София 1766, България

**Имейл:** Сигнал (за предпочитане във формата, предоставена като Приложение 2 към настоящото Допълнение) може да бъде изпратен чрез електронна поща на Служителя, отговарящ за разглеждане на сигнали на следния адрес: [iva.petrova@hcl.com](mailto:iva.petrova@hcl.com)

**Устно:** Сигнал може да бъде подаден и устно, като се свържете със Служителя, отговарящ за разглеждане на сигнали. Съдържанието на сигнала ще бъде записано.

Ако подаденият Сигнал не съдържа необходимите данни, на подателя на Сигнала се изпраща уведомление за отстраняване на нередностите в срок от 7 дни от получаването на Сигнала. Ако нередностите не бъдат отстранени в този срок, формулярът на Сигнала се връща на подателя заедно с всички приложени документи, ако има такива, и Сигналът не бива разглеждан.

### Процедура по разглеждане

След подаване на Сигнала, подателят ще получи потвърждение за получаването му в рамките на 7 дни.

Служителят, отговарящ за разглеждане на сигнали, ще предостави информация на подателя на Сигнала за предприетите действия във връзка със Сигнала в срок не по-дълъг от три месеца от датата на потвърждението за получаване.

В случай че Сигналът споменава конкретно лице, свързано с предполагаемото Нарушение, Служителят, отговарящ за разглеждане на сигнали, ще предостави на това лице всички събрани доказателства и ще му даде възможност да възрази срещу тях в срок от 7 дни, като продължава да гарантира защитата на подателя на сигнала. Ако са необходими повече информация и/или доказателства, свързани със Сигнала, Служителят, отговарящ за разглеждане на сигнали може да ги



the Whistleblower, a person associated with the reported Breach, or a third party.

If the alleged facts in the Signal report are confirmed, the Designated Officer will:

- Arrange for follow-up action to be taken;
- Suggest to the Company that specific measures be taken to stop or prevent the Breach in cases where such Breach has been detected or there is a real risk of its imminent commission;
- Refer the Whistleblower to the competent authorities if his/her rights are affected;
- Refer the Signal to the Commission for Personal Data Protection where action by the latter is necessary. The Whistleblower shall be informed in advance of the referral. Where the Signal is against the Company in its capacity as an employer, the Designated Officer shall refer the Whistleblower to the Commission for Personal Data Protection.

At the end of the Signal investigation, the Signal will be documented in an individual report, briefly describing the information and/or documents accompanying it, the actions taken, the outcome of the investigation, which, together with the reasons, shall be communicated to the Whistleblower and to the person associated with the alleged Breach, subject to the obligation to protect them.

Where evidence of a criminal offence has been established, the Signal report and any accompanying documents will be sent immediately to the public prosecutor's office.

### **Documentation and Reporting**

All documentation pertaining to the Signal, including but not restricted to the investigation report, corrective action taken, and evidence will be maintained in an internal a register of whistleblowing signals for a period of not less than 3 years from the date of submission of the Signal.

изиска или от лицето, подало Сигнала, или от лице, свързано с докладваното Нарушение, или от трета страна.

Ако предполагаемите факти в доклада за Сигнала се потвърдят, Служителят, отговарящ за разглеждане на сигнали ще:

- Организира предприемането на последващи действия;
- Предложи на Дружеството да предприеме конкретни мерки за спиране или предотвратяване на Нарушението в случаите, когато такова Нарушение е било установено или съществува реален риск от предстоящото му извършване;
- Насочи Лицето, подаващо сигнал, към компетентните органи, ако са засегнати неговите/нейните права;
- Препрати Сигнала към Комисията за защита на личните данни, когато са необходими действия от нейна страна. Лицето, подаващо сигнала, се уведомява предварително за препращането. Когато Сигналът е срещу Дружеството в качеството му на работодател, Служителят, отговарящ за разглеждане на сигнали, препраща лицето, подало сигнала, към Комисията за защита на личните данни.

В края на разследването на Сигнала той се документира в индивидуален доклад, в който накратко се описват информацията и/или документите, които го придружават, предприетите действия, резултатът от разследването, който заедно с мотивите се съобщава на Лицето, подало Сигнала и на лицето, свързано с предполагаемото нарушение, при спазване на задължението за тяхната защита.

При установяване на данни за престъпление, докладът по Сигнала и всички придружаващи го документи се изпращат незабавно на прокуратурата.

### **Документиране и докладване**

Цялата документация, свързана със Сигнала, включително, но не само, докладът от разследването, предприетите коригиращи действия и доказателствата, ще се съхраняват във вътрешен регистър на сигналите за период не по-малък от 3 години от датата на подаване на Сигнала.

## Roles and Responsibilities

Whistleblower:

- The Whistleblower provides the Signal, which is the initial information related to a reasonable belief that a Breach has occurred;
- The Whistleblower must provide all factual corroborating evidence, as is available to them
- The Whistleblower is not be liable for the acquisition of, or access to, the information reported or made public, provided that such acquisition or access does not constitute a crime.
- The Whistleblower is not liable for a violation of any restriction on disclosure of information imposed by contract, law, secondary legislation or administrative act, provided that the Whistleblower has reasonable grounds to believe that the filing of the Signal or the public disclosure of the information was necessary to disclose the violation.

Designated Officer:

- Receives Signals;
- Acknowledges receipt of Signals;
- Informs persons if they are associated with an alleged Breach;
- Prepares Signals reports;
- Maintains the Company's register of Signals;
- Ensures that the identity of the Whistleblower and any other person mentioned in the Signal is properly protected and takes the necessary measures to restrict access to the Signal by unauthorised persons.

## Whistleblower Protection

The Whistleblower receives protection provided that:

- there was a reasonable cause to believe that the information submitted about the Breach

## Роли и отговорности

Лицето, подаващо Сигнала за нарушение:

- Подава Сигнала, който представлява първоначалната информация, свързана с основателно убеждение, че е извършено Нарушение;
- Лицето, което подава сигнал, трябва да предостави всички фактически доказателства, с които разполага.
- Лицето, подаващо Сигнала, не носи отговорност за придобиването на информацията, за която е подаден сигналът или която е публично оповестена, или за достъпа до нея, при условие че това придобиване или този достъп не съставлява самостоятелно престъпление.
- Лицето, подаващо сигнал за нарушение, не носи отговорност за нарушаване на ограниченията за разкриване на информация, предвидени с договор, законов или подзаконов нормативен акт или административен акт, при условие че има основателни причини да счита, че подаването на Сигнал или публичното оповестяване на информацията е било необходимо за разкриване на нарушението.

Служителят, отговарящ за разглеждане на сигнали:

- Получава Сигнали;
- Потвърждава получаването на Сигналите;
- Информира лица, ако са свързани с предполагаемо Нарушение;
- Изготвя доклади за Сигналите;
- Поддържа регистъра на Сигналите на Дружеството;
- Гарантира, че самоличността на подателя на Сигнала и на всяко друго лице, споменато в Сигнала, е надлежно защитена, и предприема необходимите мерки за ограничаване на достъпа до Сигнала от неупълномощени лица.

## Защита на лицата, подаващи Сигнали

Лицето, подаващо Сигнал, получава защита при условие че:

- е имало основателна причина да се смята, че подадената информация за нарушението е била вярна към момента на подаването ѝ и че

was correct at the time it was submitted and that such information falls within the Scope of the Whistleblowing Act;

- the Signal was reported in accordance with the terms and conditions of the Whistleblowing Act.

The Company will ensure to protect Whistleblowers against retaliation, as described below:

- The Company prohibits retaliation against a Whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). This protection from retaliation is not intended to prohibit managers or supervisors from acting, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

### External Reporting of Signals

Notwithstanding the possibility to submit a Signal for a Breach to the Designated Officer of the Company, signals about Breaches may be also submitted to the Bulgarian Commission for Personal Data Protection. More information about the exact procedure to be followed can be found at Commission for Personal Data Protection's website: <https://www.cdpd.bg/index.php?offset=6&p=home>. Submitting a Signal to the Company does not prevent Whistleblowers from reporting Signals externally as well and vice versa.

### Public disclosure of information about a breach

The Whistleblower receives protection when publicly discloses information on a breach provided that he had reasonable grounds to believe that the information on the breach was correct at the time of its disclosure and one of the following conditions is met:

тази информация попада в обхвата на Закона за подаване на сигнали за нарушения;

- Сигналът е подаден в съответствие с условията на Закона за подаване на сигнали за нарушения.

Дружеството ще осигури защита на лицата, подаващи сигнали за нередности, срещу репресивни ответни действия, както е описано по-долу:

- Дружеството забранява репресивни ответни действия срещу подател на Сигнал, които имат за цел или резултат неблагоприятно въздействие върху условията на труд (включително, но не само, заплахи за физическо насилие, загуба на работа, наказателни работни задачи или въздействие върху заплатата или възнаграждението). Тази защита от репресивни ответни действия няма за цел да забрани на мениджърите или надзорниците да предприемат действия, включително дисциплинарни мерки, в обичайния обхват на техните задължения и въз основа на валидни фактори, свързани с изпълнението.

### Външно подаване на Сигнали

Независимо от възможността за подаване на Сигнал за Нарушение до Служителя, отговарящ за разглеждане на сигнали на Дружеството, сигнали за Нарушения могат да се подават и до българската Комисия за защита на личните данни. Повече информация за точната процедура, която трябва да се следва, можете да намерите на уебсайта на Комисията за защита на личните данни: <https://www.cdpd.bg/index.php?offset=6&p=home>. Подаването на Сигнал до Дружеството не пречи на лицата, подаващи сигнали, да подават Сигнали и външно, както и обратно.

### Публично оповестяване на информация за нарушение

Лицето, подаващо Сигнал получава защита когато публично оповестява информация за нарушение, когато е имал основателна причина да счита, че информацията за нарушението е била вярна към момента на оповестяването и е изпълнено, някое от следните условия:

- the Whistleblower has reported a breach, but no appropriate action has been taken on it within the time limit;
- the Whistleblower has grounds to believe that:
  - the breach may constitute an immediate or manifest danger to the public interest or there is a risk of damage that cannot be remedied;
  - in the case of external reporting, there is a risk of retaliation or a likelihood that the breach will not be effectively addressed due to the risk of concealing or destroying evidence, suspicion of collusion between the competent authority and the perpetrator of the breach, or of complicity of the authority in the breach, as well as other specific circumstances of the case.
- Лицето, подаващо Сигнал е подал Сигнал, но по Сигнала не са били предприети съответни действия в срок;
- Лицето, подаващо Сигнал има основания да смята, че:
  - нарушението може да представлява непосредствена или явна опасност за обществения интерес или съществува риск от щети, които не могат да бъдат отстранени;
  - в случай на външно подаване на Сигнал съществува риск от ответни действия или има вероятност нарушението да не бъде ефективно разгледано поради опасност от укриване или унищожаване на доказателства, съмнение за наличие на тайно споразумение между компетентния орган и извършителя на нарушението, или за съучастие на органа в нарушението, както и поради други специфични конкретни обстоятелства по случая.

### Confidentiality and Personal Data Protection

The Company will take appropriate measures to protect information relating to whistleblowing and to protect the identity of Whistleblowers by ensuring that access to the information is restricted to the employees who need the data to perform their duties.

Any processing of personal data, including the exchange or transfer of personal data by competent authorities, shall be carried out in accordance with Regulation (EU) 2016/679 and Directive (EU) 2016/680, and, where the transfer involves institutions, bodies, offices or agencies of the European Union, in accordance with Regulation (EU) 2018/1725, as well as the Personal Data Protection Act.

No personal data that is manifestly irrelevant to the examination of the specific Signal will be processed and, if collected incidentally, shall be deleted.

### Amendments

The Company undertakes to review its internal whistleblowing procedure at least once every three years and, according to the practice and guidelines of Bulgarian Commission on Personal Data Protection, amend the procedure, if needed.

### Конфиденциалност и защита на личните данни

Дружеството ще предприеме подходящи мерки за защита на информацията, свързана с подаването на Сигнали за нередности, и за защита на самоличността на Лицата, подали Сигнали, като гарантира, че достъпът до информацията е ограничен до служителите, на които тези данни са необходими за изпълняване на служебните им задължения.

Всяко обработване на лични данни, включително обмен или предаване на лични данни от компетентните органи, се извършва в съответствие с Регламент (ЕС) 2016/679 и Директива (ЕС) 2016/680, а когато предаването включва институции, органи, служби или агенции на Европейския съюз – в съответствие с Регламент (ЕС) 2018/1725, както и със Закона за защита на личните данни.

Няма да се обработват лични данни, които са очевидно неотнормими към разглеждането на конкретния Сигнал, а ако са събрани инцидентно, се заличават.

### Изменения

Дружеството се задължава да преразглежда своята вътрешна процедура за защита на лица, подаващи сигнали за нередности поне веднъж на три години и, в съответствие с практиката и насоките на българската

Комисия за защита на личните данни, да я изменя, ако е необходимо.

## Communication

This Addendum as amended from time to time shall be disclosed and clearly communicated to all employees of the Company.

### **Annexure 1: List of breaches within the scope of the Bulgarian Whistleblowing Act and this Addendum:**

1. Breaches of Bulgarian legislation or acts of the European Union in the areas of (complete list is available in the Whistleblowing Act):

- (a) public procurement;
- (b) financial services, products and markets, and prevention of money laundering and terrorist financing;
- (c) safety and compliance of products;
- (d) transport safety;
- (e) protection of the environment;
- (f) radiation protection and nuclear safety;
- (g) food and feed safety, animal health and welfare;
- (h) public health;
- (i) consumer protection;
- (j) respect for privacy and protection of personal data;
- (k) security of network and information systems;

2. Breaches affecting the financial interests of the European Union as referred to in Article 325 of the Treaty on the Functioning of the European Union;

3. Breaches of the rules of the internal market as referred to in Article 26, paragraph 2 of the Treaty on the Functioning of the European Union, including the rules of the European Union and Bulgarian legislation on competition and state aid;

4. Breaches relating to cross-border tax arrangements, the purpose of which is to obtain

## Комуникация

Настоящото Допълнение, както е изменяно периодично, се оповестява и се съобщава на всички служители на Дружеството.

### **Приложение 1: Списък на нарушенията, попадащи в обхвата на българския Закон за подаване на сигнали за нарушения и настоящото Допълнение:**

1. Нарушения на българското законодателство или на актовете на Европейския съюз в следните области (пълният списък се съдържа в Закона за подаване на сигнали за нарушения):

- а) обществените поръчки;
- б) финансовите услуги, продукти и пазари и предотвратяването на изпирането на пари и финансирането на тероризма;
- в) безопасността и съответствието на продуктите;
- г) безопасността на транспорта;
- д) опазването на околната среда;
- е) радиационната защита и ядрената безопасност;
- ж) безопасността на храните и фуражите, здравето на животните и хуманното отношение към тях;
- з) общественото здраве;
- и) защитата на потребителите;
- к) защитата на неприкосновеността на личния живот и личните данни;
- л) сигурността на мрежите и информационните системи;

2. Нарушения, които засягат финансовите интереси на Европейския съюз по смисъла на чл. 325 от Договора за функционирането на Европейския съюз;

3. Нарушения на правилата на вътрешния пазар по смисъла на чл. 26, параграф 2 от Договора за функционирането на Европейския съюз, включително правилата на Европейския съюз и българското законодателство относно конкуренцията и държавните помощи;

4. Нарушения, свързани с трансгранични данъчни схеми, чиято цел е да се получи данъчно

a tax advantage that defeats the object or purpose of the applicable corporate tax law;

5. A committed criminal offence of a general nature, of which a person has become aware in connection with the performance of his or her work or his or her official duties.

6. Breaches of Bulgarian law concerning:

(a) the rules for payment of outstanding public state and municipal receivables;

(b) labour law;

(c) the legislation related to the performance of public service.

предимство, което противоречи на предмета или на целта на приложимото право в областта на корпоративното данъчно облагане;

5. Извършено престъпление от общ характер, за което лице по чл. 5 е узнало във връзка с извършване на своята работа или при изпълнение на служебните си задължения.

6. Нарушения на българското законодателство в областта на:

(a) правилата за заплащане на дължими публични държавни и общински вземания;

(b) трудовото законодателство;

(c) законодателството, свързано с изпълнението на държавна служба.

## Annexure 2: Form for submitting a Signal:

## Приложение 2: Формуляр за подаване на Сигнал:

Form for submitting a Signal	Формуляр за подаване на Сигнал
<p><i>For the Designated Officer:</i></p> <p>UIN: _____</p> <p>Date: _____</p> <p>Form of submission (<i>written/ oral/personally/through a proxy</i>)</p> <p>_____</p> <p><i>Details of the Designated Officer:</i></p> <p>Name: _____</p> <p>Position: _____</p> <p><b>Part I. Details of the Whistleblower</b> <b>(the information could be provided only in Bulgarian language)</b></p> <p>Name: _____</p> <p><i>Contact details</i></p> <p>Region: _____</p> <p>City: _____</p> <p>Correspondence address: _____</p> <p>_____</p> <p>Telephone: _____</p>	<p><i>За Служителят, отговарящ за разглеждане на сигнали:</i></p> <p>УИН: _____</p> <p>Дата: _____</p> <p>Начин на подаване (<i>писмен/устен/лично/чрез пълномощник</i>)</p> <p>_____</p> <p><i>Данни за Служителят, отговарящ за разглеждане на сигнали:</i></p> <p>Име: _____</p> <p>Длъжност: _____</p> <p><b>Част I. Данни за Лицето, подаващо сигнал</b> <b>(информацията може да бъде подадена и само на български език)</b></p> <p>Име: _____</p> <p><i>Данни за контакт</i></p> <p>Област: _____</p> <p>Населено място: _____</p> <p>Адрес за кореспонденция: _____</p> <p>_____</p> <p>Телефон: _____</p>

E-mail: \_\_\_\_\_

**Part II. Details of the person against whom the alert is lodged**

Name: \_\_\_\_\_

**Part III. Details of the breach**

The breach relates to:

\_\_\_\_\_

Date/period of the breach:

\_\_\_\_\_

Description of the breach:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Description of the attached evidence:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Part IV. Persons other than the Whistleblower to whom protection should be given**

Capacity of the person: \_\_\_\_\_

Name: \_\_\_\_\_

*Contact details*

City: \_\_\_\_\_

Correspondence address: \_\_\_\_\_

\_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**Part V. Persons who can confirm the reported data or provide**

Ел. поща: \_\_\_\_\_

**Част II. Данни за лицето, срещу което се подава сигнала**

Име: \_\_\_\_\_

**Част III. Данни за нарушението**

Нарушението е свързано с:

\_\_\_\_\_

Дата/период на извършването на нарушението:

\_\_\_\_\_

Описание на нарушението:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Опис на приложените доказателства:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Част IV. Лица, различни от Лицето, подаващо сигнал, на които да се предостави защита**

Качество на лицето: \_\_\_\_\_

Име: \_\_\_\_\_

*Данни за контакт*

Населено място: \_\_\_\_\_

Адрес за кореспонденция: \_\_\_\_\_

\_\_\_\_\_

Телефон: \_\_\_\_\_

Ел. адрес: \_\_\_\_\_

**Част V. Лица, които могат да потвърдят съобщенията**

**additional information**

Name: \_\_\_\_\_

*Contact details*

City: \_\_\_\_\_

Correspondence address: \_\_\_\_\_  
\_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

**данни или да предоставят допълнителна информация**

Име: \_\_\_\_\_

*Данни за контакт*

Населено място: \_\_\_\_\_

Адрес за кореспонденция: \_\_\_\_\_  
\_\_\_\_\_

Телефон: \_\_\_\_\_

Ел. адрес: \_\_\_\_\_

*For the Designated Officer / За Служителят, отговарящ за разглеждане на сигнали*

\_\_\_\_\_  
Date / Дата

\_\_\_\_\_  
Name / Име

\_\_\_\_\_  
Position / Длъжност

\_\_\_\_\_  
Signature / Подпис

*For the Whistleblower / За Лицето, подаващо сигнал*

\_\_\_\_\_  
Date / Дата

\_\_\_\_\_  
Name / Име

\_\_\_\_\_  
Signature / Подпис



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