



1. PURPOSE AND SCOPE

To receive and handle reports concerning ethics, human and labour rights, safety, the environment, fraud, corruption or breaches of the Code of Conduct within IMF or its supply chain, impartially and confidentially. This covers events that have occurred, are ongoing, are foreseeable or have been concealed.

The channel may be used by employees, former employees, applicants, trainees, suppliers, service providers, customers and others with relevant information. Reports may be written in Portuguese or English, without a form or complete supporting evidence, setting out the facts, dates, location and available information. Providing identification and contact details for a response is optional. In the event of immediate danger, emergency arrangements must be activated.

2. REPORTING CHANNEL AND RESPONSIBILITIES

Dedicated email: **ethics@imflorestal.com**. The Whistleblowing Channel Officer checks the mailbox each working day, follows up cases and monitors deadlines. Approval of this instruction formalises the appointment, subject to acceptance of the duty of confidentiality. The Board ensures that resources and measures are in place, without interfering with the assessment or requiring disclosure of the reporting person's identity.

IT configures Outlook access exclusively for the Whistleblowing Channel Officer, with multi-factor authentication, access logs and protected backups. Credentials must not be shared and forwarding must not be enabled. Exceptional technical access is restricted, logged and confidential. Permissions are reviewed annually and whenever a replacement is appointed; notifications must not disclose content on shared devices.

The Board appoints an independent recipient and a deputy to cover absences in advance; these may be the same person where there is no conflict of interest. The alternative contact is separate and publicised alongside the main contact. If a report concerns the Whistleblowing Channel Officer or the Board, those involved must not receive, investigate, decide on or access the case. A conflict identified after receipt requires a secure, recorded transfer and the cessation of involvement. Follow-up is assigned to a designated person or department within IMF with no conflict of interest, with external support where necessary. If the alternative recipient is also unable to act, another independent person is appointed without the involvement of those concerned.

Anonymous reports are accepted without attempting to identify the sender. As email may reveal the sender's identity, an unsigned letter may also be sent in a sealed envelope directly to the independent recipient at the address in section 6. The absence of contact details does not prevent assessment; only the inability to respond is recorded.



3. HANDLING REPORTS IN FOUR STEPS

1. Receive and assess. Assign a reference DEN-Year-Number (e.g. DEN-2026-0001) and retain the original message. Check for conflicts of interest, urgency and any need to preserve evidence or protect people. Refer routine matters elsewhere only after confirming that they do not include matters covered by whistleblower protection.

2. Acknowledge receipt. Reply within 7 days of receipt, stating the reference and the safeguards provided by the channel. Explain the conditions, competent authorities and methods for external reporting applicable to the case. Reporting to the authorities in accordance with the law does not require IMF's authorisation.

3. Investigate and provide feedback. Gather the necessary information, hear from relevant people and seek support only where needed. Communicate the measures planned or taken and the reasons for them within 3 months of receipt, even if the assessment is still ongoing.

4. Decide and follow up. Record the reasoned conclusion, measures, responsible person and deadline. The decision may involve corrective measures, further investigation, referral to the authorities or closure without further action. If requested, inform the reporting person of the outcome within 15 days of completing the assessment. Close the case with the decision recorded and follow-up arrangements defined.

4. CONFIDENTIALITY AND PROTECTION

Access to the case is limited to authorised persons who need the information, are bound by confidentiality and have no conflict of interest. During enquiries, share only what is essential, removing identifying details wherever possible. The reporting person's identity is kept separately from case summaries. The duty of confidentiality continues after the person leaves the role.

The reporting person's identity may only be disclosed outside the authorised group where required by law or a court decision, with prior written notice, unless this would compromise the investigation or proceedings. Persons concerned and third parties are also protected. Persons concerned are entitled to an impartial assessment and the right to defend themselves; a report alone does not justify a sanction.

Retaliation, threats, discrimination or detrimental treatment in employment or contractual relationships following a report made in good faith on reasonable grounds are prohibited, including against those assisting the reporting person or associated persons. Suspected retaliation is addressed as a priority by someone with no conflict of interest, with protective and remedial measures. Lack of evidence does not mean that a report is false; any suspected deliberate falsehood is assessed separately, with the right to defend oneself.



5. A SINGLE CASE FILE FOR EACH REPORT

Use one restricted-access folder per case, containing the report, correspondence and a follow-up note recording the reference, date, subject, responsible person, deadlines, enquiries, decision and measures. Separate forms for each step are not required. Keep identifying data in a separate file with limited access. Store paper records in a locked cabinet. Do not place these records in general folders or in the general action management system.

IMF processes only the data required and deletes data that are manifestly irrelevant. The channel's privacy notice specifies the purpose, legal basis, recipients, retention arrangements and rights, including the right to complain to the Portuguese Data Protection Authority (CNPD). Data access requests must not disclose the reporting person's protected identity.

Retain reports covered by Law No. 93/2021 for at least 5 years and for as long as any related judicial or administrative proceedings remain ongoing. For other communications, define and record a retention period appropriate to the purpose and applicable obligations. At the end of that period, delete the records securely, including from backups in accordance with their retention cycle.

Management receives aggregated information without identifying details. Customers and auditors receive evidence that the channel is operating, without access to actual reports or identifying data. Review this instruction during the management review, when held, and whenever there are changes in legislation or failures in the channel.

If the alternative recipient is also unable to act, another independent person must be appointed, without those concerned participating in the selection or accessing the case. The reporting person retains the right to contact the competent authorities under the conditions laid down by law. IMF's authorisation is not required.



6. SUBMITTING REPORTS BY POST

Reports may also be sent by post, with or without the sender's identification, in a sealed envelope marked "Confidential — Whistleblowing Channel". The envelope must be delivered unopened to the person designated to receive reports by this route, at:

Ibero Massa Florestal, S. A.
Rua Manuel Oliveira Borges, nº75
3720-584 Avenal UL – Oliveira de Azeméis
Portugal

References: IMF Management Manual and Code of Conduct; Portuguese Law No. 93/2021 (Articles 7 to 11 and 18 to 21); GDPR and Portuguese Law No. 58/2019. Statutory protection applies subject to the conditions laid down by law; IMF extends internal protection to the other matters covered by this instruction.