

PCM ROM S.R.L.

Mun. Giurgiu, șos. Portului, nr. 1

Jud. Giurgiu, România

PROCEDURE

on reporting and protection of whistleblowers in the public interest

In accordance with the provisions of Law no. 361/2022 on the protection of whistleblowers in the public interest, our company will make available to all potential whistleblowers a special form (see attached) the use of which makes reporting to the Corruption Prevention Officer easier and more responsive to the requirements of this procedure. The form is available on the company's website accessible to all <https://www.p-csystem.com> where this procedure is also published, whereby **any person working within PCM ROM S.R.L., shareholder or member of the company's management and/or administrative bodies, collaborator, may report violations of the law**, which have occurred or are likely to occur, within our company. These persons are called by law "**public interest whistleblowers**".

Thus, **breach reports may be made in writing, by telephone or face-to-face with the person designated to receive the report.** The report **must include at least the following elements**: name and surname, contact details of the public interest whistleblower, the professional context in which the information was obtained, the person concerned, if known, a description of the fact likely to constitute a breach of the law within our company, and, where appropriate, the evidence supporting the report, the date and signature, if applicable.

Reports made with malice or gross negligence or that are found to be false, unsubstantiated, defamatory, or made with the intent to cause damage to our company, the person reported, or other parties involved in the report expose the whistleblower to civil and criminal liability.

Personal complaints cannot be subject of a report within the meaning of the law.

Reports made anonymously can only be taken into account if they are adequately substantiated and provide details of the breach. These reports may be subsequently integrated with the whistleblower's details.

The person designated to receive the reports of the warnings is the lawyer Mr. MILITARU ANDREI-MIHAI, form the Giurgiu Bar, with office in Giurgiu, str. P-ța. 1848, bloc 48, sc. C, ap. 36, jud. Giurgiu; email: adimilitaru76@yahoo.com; tel. 0721.993.856.

In this way, the reports will be communicated directly to lawyer Militaru Andrei-Mihai (at the office address, by email or by phone), ensuring the confidentiality of the identity of the whistleblower and of any third party mentioned in the report, also the protection of personal data.

After communication of the report, the whistleblower shall receive confirmation of receipt of the report and information on the status of the procedure following the report within a maximum of 3 months form the confirmation of receipt of the report. Thereafter, the whistleblower and the management of the company will be informed of how the report will be dealt with.

The whistleblower may also communicate the report through the external channel, respectively to the authorities in charge of dealing with reports of violations of the law, as well as the National Integrity Agency.

Any further information about the application of Law no. 361/2022 on the protection of whistleblowers in the public interest can be obtained by contacting the person desinated for this purpose, lawer Militaru Andrei-Mihai.

A model infringement report is attached.

Manager,
Eng. Bogdan-Narcis Pena





REPORT

Whistleblower's first and last name: _____

PIN: _____

Job title or position: _____

Job _____

Tel.: _____

Email: _____

Date/Period when the event took place: _____

Physical location where the event took place

- Inside the workplace
- External company premises (indicate the name and address)

The acts or omissions committed or attempted are:

- from the criminal point of view
- committed in breach of the Code of Conduct or other company provisions punishable by disciplinary measures
- likely to cause financial damage to their administration or to another public body
- likely to cause financial damage to the health or safety of employees and/or third parties or harm the environment
- likely to cause harm to users and/or employees and/or other persons working within the company

Description of the act (behavior or event)

The perpetrator(2) of the crime (indicate personal data if known and, any other suitable element for identification) :



1. _____
2. _____
3. _____

Any other persons who gave knowledge of the act/or are in a position to report it

1. _____
2. _____
3. _____

Any annexes supporting the declaration: _____

Place and date

_____, _____

The report can be presented in the following ways:

a) by sending a communication to the e-mail address adimilitaru76@yahoo.com , requesting the scheduling of a meeting for the oral presentation of the report. The request for scheduling a meeting for the oral presentation of the report can also be made by telephone on 0721.993.856 (Lawyer Militaru Andrei).

In both cases, the identity of the whistleblower will be known only by lawyer Militaru Andrei, who will guarantee their confidentiality, except in cases where it cannot be imposed by law;

b) by postal services, by sending a registered envelope with acknowledgment of receipt to Militaru Andrei-Mihai Law Firm from Mun. Giurgiu, str. P-ța 1848, bl. 48, sc. C, ap. 36, jud. Giurgiu. In this case, in order to benefit from the guarantee of confidentiality, it is necessary that the report be placed in a sealed envelope bearing on the outside the mention „Whistleblower Report in public interest”.

