

# EU Whistleblower Protection Procedure

This document establishes the procedure to be used by Unisys for managing the investigation of whistleblower reports raised in accordance with EU Directive (EU) 2019/1937 on the Protection of Persons Who Report Breaches of EU Law.

## Internal Investigation procedure

### Scope:

**Eligible reporters:** The following natural persons are eligible to report concerns: all associates, officers, former associates, applicants, shareholders, and supervisory body members of EU-based Unisys entities<sup>1</sup>, and any person working for or under the supervision and direction of the contractors, subcontractors, and suppliers of such EU-based Unisys entities.

### Reportable matters:

- Public procurement
- Financial services
- Products and markets
- The prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food safety, animal health, and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data and security of network and information systems
- Breaches of the EU's financial interests
- Breaches related to the EU internal market (including state aid rules and corporate tax rules)
- Breach of local country laws
- Violations of the Company's Code of Ethics and Business Conduct

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<sup>1</sup> Unisys Österreich GmbH, Unisys Belgium, Unisys Consulting, Unisys Consulting BV, Unisys France SAS, Mobinergy SAS, Unisys Deutschland GmbH, Unisys Magyarország Kft, Unisys Corporation Lietuvos filialas, Unisys S.L.U., Unisys Europe Finance B.V., Unisys Global Holding B.V., Unisys Nederland N.V.

## Receipt of Reports:

Reporters can choose from the following internal reporting channels at Unisys if they want to raise a concern internally (for country-specific reporting channel information please see Appendix A):

- Immediate or senior level Leaders,
- Members of Human Resources, the Ethics & Compliance Office, or the Legal Department
- The Unisys Helpline ([www.Unisyscompliance.com](http://www.Unisyscompliance.com)) or the Call Center
- Mail: [~ComplianceEthicsOffice@unisys.com](mailto:~ComplianceEthicsOffice@unisys.com)
- The Audit and Finance Committee of the Board of Directors [~UnisysAC@unisys.com](mailto:~UnisysAC@unisys.com)

While specific local contacts have not been designated for every country (except for Spain<sup>2</sup>), reports can be raised to local Leaders, Compliance, HR and Legal functions available in your country (if you would like help identifying a local contact, please reach out to Ethics & Compliance for guidance). If a report is raised directly to a Leader, HR or Legal functions, they must promptly inform the corporate Ethics & Compliance Office about the report, and must otherwise maintain confidentiality.

If a whistleblower wishes to verbally report an issue locally, in person, a meeting must be scheduled within reasonable period<sup>3</sup>, and with the prior consent of the reporter either recorded electronically or documented in detail in writing, and then provided to the reporter for review and acknowledgement of its accuracy. During the meeting, the investigator should inform<sup>4</sup> the reporter about confidentiality, what they can expect during the investigation procedure, and how their data will be handled.

Anonymous reports are accepted via email, or via the helpline or call center both of which generate an automatic log in our Case Management System and enables the exchange of messages with anonymous reporters while still maintaining confidentiality.

## Triage:

In order to appoint a lead investigator for the investigation of the whistleblower report, the Ethics & Compliance Office will assess the following factors:

- Does the allegation, if substantiated, require informing local, European or US authorities?
- Skillset and subject matter expertise required for the investigation;

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<sup>2</sup> The governing Body of Unisys Spain appointed a System Manager overseeing the investigation program in Spain and operating as a local reporting channel.

<sup>3</sup> A meeting should be organized with the whistleblower to document their verbal report within 7 days in Spain, 14 days in Austria, 20 days in France.

<sup>4</sup> In case of a verbal report in Hungary, the whistleblower should be made aware of the consequences of reporting in bad faith, the procedural rules governing the investigation of the report, and that his or her identity will be treated confidentially at all stages of the investigation if he or she provides the information necessary to establish it.

- Potential conflicts of interest for available investigators;
- Potential risk associated with the investigation (e.g., sensitive issue types, level of involved associates and materiality of impact);
- Retaliation risk – whether special protection should be applied to the reporter and other involved parties.

When there is evidence that a criminal act has been committed, the information shall be forwarded immediately to the appropriate authority.

### **Confidentiality and Data Privacy:**

The identity of the whistleblower or any party providing information or evidence during the investigation should be kept confidential and not be disclosed. There are, however, exceptions to this rule if an administrative authority, a court or the public prosecutor's office considers such information to be indispensable in the context of administrative or judicial proceedings or an investigation under a Criminal Procedure.

While the GDPR generally prohibits the processing of sensitive personal data, if a report contains sensitive personal data, reach out to the Privacy Office and discuss whether an exception may apply to the general rule that would allow us to process and use the data in connection with certain types of investigations.

Investigations are conducted in accordance with our Data Privacy provisions. Company uses a Case Management System which collects and maintains data indicated in the [Unisys Speak Up Privacy Notice](#) and provides restricted access to individuals who need to have access.

If a person who is the subject of a report submits a data subject access request, the identity of the reporter must not be disclosed to the requester.

### **Records management / communication with reporter:**

All whistleblower reports should be recorded in our Case Management System if not already reported through the helpline/call center which generates an automatic entry. Within 7 calendar days<sup>5</sup> from the whistleblower report reception, the reporter should be sent an acknowledgement of receipt of their report, except if doing so could potentially jeopardize the confidentiality of the reporter. In the case of an issue raised through the helpline, the confirmation can be also sent through the helpline which is the standard for anonymous reports. In cases using email acknowledgement, the email should be uploaded into the Case Management System.

In case of verbal reports, the written summary (signed by the reporter) or recording should also be uploaded to the Case Management System.

The reporter can provide additional information on the reported matter throughout the investigation and the investigator should also reach out through contact details if further information is needed in order to complete the investigation. In case of anonymous reports –

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<sup>5</sup> Acknowledgment should be sent in 2 days for reports raised in Lithuania

raised through the helpline - the reporter communication section of our Case Management System should be used for that purpose.

### **Conduct investigation:**

Lead investigator should develop a plan for the investigation, identifying the parties to be interviewed, the sequence of interviews and any necessary records that should be obtained.

Data privacy provisions should be considered and complied with when organizing interviews, collecting, and preserving evidence. The interviewed parties should be informed about how their personal data will be handled with regards to the investigation (by sharing the [Unisys Speak Up Privacy Notice](#)).

The corporate investigation manual provides guidance for the investigation steps and any additional questions or concerns should be raised to the Ethics & Compliance Office who will provide support.

All interviews and the investigations should be conducted in a respectful, confidential, and impartial manner and the subject/s affected should be treated with dignity, honor and with respect for the presumption of innocence.

All parties involved in the investigation are protected from retaliation which should be highlighted in every interview along with reminders about confidentiality.

The affected person has the right to be informed about the actions or omissions attributed to them and be heard during the investigation.

The investigation should be completed within a reasonable timeframe, generally a maximum of 3 months <sup>6</sup> from the date of whistleblower report reception, but may be extended by an additional three months for particularly complex cases.

### **Conclusion and feedback to reporter:**

When the investigation is completed, the lead investigator should create a written report and share it with the Ethics & Compliance Office. The lead investigator or the Ethics & Compliance Office will provide feedback to the reporter about the closure of the investigation. The feedback<sup>7</sup> may include information on planned and already taken follow-up measures, however, information should only be provided to the extent it does not affect other internal investigations and the rights of the persons who are the subject of, or named in, the whistleblower report. The investigation summary memo or report and additional supporting evidence should be uploaded to the Case Management System and the case closed in the tool. All additional collected records that are not part of or referenced in the investigation summary should be destroyed without undue delay.

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<sup>6</sup> Investigation should be completed in 30 days in case of reports raised in Hungary which can be extended up to 3 months in particularly complex cases

<sup>7</sup> For issues reported in Lithuania, feedback should be provided on the investigation progress within 10 days after the report is made informing the reporter about the investigation procedure or the reason why a decision was made not to pursue the matter further.

## **Retaliation prevention**

Unisys does not tolerate retaliation. It can be uncomfortable to act with integrity, and speaking up can take courage. That is why we do not tolerate retaliation for reports made in good faith. Anyone who retaliates against a reporter/whistleblower for reporting concerns or against other associates participating in an investigation will be subject to disciplinary action, up to and including termination. If you experience retaliation, or you know of someone else being subject to retaliation, you should speak up and report your concerns through the above reporting channels detailed in 'Receipt of Reports'. The Ethics & Compliance Office also performs periodic checks on selected reports both in conjunction with HR and through our Quality Assurance Check program.

## **Follow up:**

The Ethics & Compliance Office should assess the need for subsequent quality assurance review, targeted retaliation check, and follow up on management action(s). The Ethics & Compliance Office will regularly assess, with the assistance of the Privacy Office, whether the legitimate interests of the company require keeping personal data related to the reports closed in that quarter or whether such data should be destroyed. Investigation records should be kept according to the corporate data retention schedule.

## **External channel, local country legislation:**

Unisys encourages all associates to report concerns internally so we can properly investigate and remediate issues including following up on action reports, but in addition to internal channels, there are also external communication channels available including those detailed in Appendix B.

## APPENDIX A – Country specific reporting details

In addition to in-country based HR, Legal and Compliance functions you can raise concerns to the following internal reporting channels:

<b>Country</b>	<b>Phone number</b>	<b>Email</b>
Austria	800281119	complianceethicsoffice@unisys.com
Belgium	080026039	complianceethicsoffice@unisys.com
Germany	08001812396	complianceethicsoffice@unisys.com
France	0805080339	complianceethicsoffice@unisys.com
Hungary	+36212111440	complianceethicsoffice@unisys.com
Lithuania	880030451	complianceethicsoffice@unisys.com
Netherlands	+3108000220441	complianceethicsoffice@unisys.com
Spain	900905460	canaldedenuncias@unisys.com complianceethicsoffice@unisys.com

## **APPENDIX B – External reporting channels**

### **Austria:**

Whistleblower Authority: The Federal Office for Preventing and Combating Corruption (Bundesamt zur Korruptionsprävention und Korruptionsbekämpfung)

Whistleblower protection legislation: 1921 der Beilagen XXVII. GP ([link](#))

### **Belgium:**

Whistleblower Authority: Federal Ombudsmen

Whistleblower protection legislation: 28 NOVEMBRE 2022. - Loi sur la protection des personnes qui signalent des violations au droit de l'Union ou au droit national constatées au sein d'une entité juridique du secteur privé ([link](#))

### **Germany:**

Whistleblower Authority: Federal Office of Justice (Bundesamt für Justiz)

Whistleblower protection legislation: Bundesgesetzblatt Teil I 2023 Ausgegeben zu Bonn am 2. Juni 2023 Nr. 140 Gesetz für einen besseren Schutz hinweisgebender Personen sowie zur Umsetzung der Richtlinie zum Schutz von Personen, die Verstöße gegen das Unionsrecht melden ([link](#))

### **France:**

Whistleblower Authority: Defender of Rights: Défenseur des Droits

Whistleblower protection legislation: LOI no 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d'alerte ([link](#)) and LOI organique n° 2022-400 du 21 mars 2022 visant à renforcer le rôle du Défenseur des droits en matière de signalement d'alerte ([link](#))

### **Hungary:**

Whistleblower Authority: Government Offices

Whistleblower protection legislation: 2023. évi XXV. törvény ([link](#))

### **Lithuania:**

Whistleblower Authority: Prosecutor's Office of the Republic of Lithuania

Whistleblower protection legislation: Projektas XIVP-659(2) LIETUVOS RESPUBLIKOS PRANEŠĖJŲ APSAUGOS ĮSTATYMO NR. XIII-804 PAKEITIMO ĮSTATYMAS ([link](#))

**Netherlands:**

Whistleblowers Authority: Huis voor klokkenluiders

Whistleblower protection legislation: Wet van 25 januari 2022 tot wijziging van de Wet Huis voor klokkenluiders en enige andere wetten ter implementatie van Richtlijn (EU) 2019/1937 van het Europees Parlement en de Raad van 23 oktober 2019 (PbEU 2019, L 305) en enige andere wijzigingen ([link](#))

**Spain:**

Whistleblowers Authority: Independent Authority for the Protection of Whistleblowers (A.A.I.)

Whistleblower protection legislation: BOE-A-2023-4513 Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción ([link](#))