Whistleblowing Policy

1. Concept

Whistle blowing is a concept in which an employer/company encourages their employees to denounce, disclose, or openly communicate their knowledge of any bad practices of the Company such as corruption, non-compliance with laws or regulations, criminal offences, or any other serious wrongdoing they have observed. Through Bizagi's Whistle-Blowing Policy, we ensure that our employees feel comfortable to make known any such bad practices they have observed during their employment.

2. Objective

The objective of this policy is to ensure that Bizagi is committed to promoting ethical principles, honesty, and safety by providing the appropriate guidelines for reporting any bad or unethical conduct of Bizagi observed by employees, officers, directors, and independent contractors.

We also want to promote a positive culture in which employees are aware and conscious of the integrity of Bizagi, assuring that any wrongdoing will be investigated and sanctioned appropriately.

3. Definitions

- "Code of Conduct" means the published document in which Bizagi lists and categorizes the appropriate behaviours an employee should have towards the company.
- "Denounce" means to openly communicate in a formal statement the wrongdoings or misconducts evidenced personally by the employee.
- "Good Faith" means an act done without deceit, with truthful and fair intentions.
- "Manager" means the person in charge of receiving, handling, investigating, and communicating the final decisions regarding the reports made by the employees.
- "Misconduct" means any action or intent to damage or affect the company's interests. Disregarding the actions mentioned in the Code of Conduct.
- "Policy" means the Whistle Blower document containing materials to understand this concept.
- "Report" means the written communication in which the reporter has left all the corresponding information of a disclosed conduct.
- "Reporter" means the Bizagi employee who discloses one of the misconducts listed in this Policy.
- "Witness" means a person that has knowledge, evidenced, or was involved with the Reported incident. It may be the same Reporter or a different individual.
- "Retaliation" means any adverse action taken against an individual in response to their good-faith reporting of concerns or suspected wrongdoing. This includes, but is not limited to, intimidation, harassment, discrimination, demotion, suspension, termination, or any other form of reprisal. Retaliation is strictly prohibited and will result in disciplinary action, up to and including termination of employment, for those found to have engaged in such behaviour.

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- "Confidentiality" means the protection of the identity of whistleblowers and the information they provide when reporting concerns of unethical or illegal behaviour. It ensures that the details of reports are shared only with individuals involved in the investigation process on a need-to-know basis and are not disclosed to unauthorized parties. Maintaining confidentiality is essential to protect the privacy and safety of whistleblowers and to encourage open and honest reporting. However, confidentiality may be subject to legal limitations, such as disclosure requirements for investigation purposes or as required by law.

4.Application:

- This policy will be applied from the published date of this policy.
- The Manager will be responsible for reviewing and managing all the Reports received.
- This policy applies to all the disclosures made for the launch date of the policy; the procedure will be respected, and the actions and decisions taken will be consistent with this document.

5.Reporting Procedure:

1. Identify the conduct that has been identified as irregular.
2. Read the Policy to ensure you are handling the disclosure accordingly.
3. Click here: link and you will be redirected to Talktospot.
4. Create a request with as much information and evidence possible.[1]
5. Other Channels:

The request will be reviewed by the corresponding Manager, which will evaluate all the conducts listed, the employees involved and evaluate the veracity of the case. The Response time for all requests is 15 working days.

6.Investigation Process:

Upon receiving a Report, Bizagi will promptly assess its validity and seriousness. If further investigation is warranted, it will be conducted thoroughly, fairly, and impartially. The confidentiality of the whistleblower will be protected, and all findings will be documented. The investigation results will determine appropriate corrective actions, which will be communicated to relevant parties. Bizagi is committed to continuous improvement of its investigation process.

[1] Please include all of the relevant information: Date, people involved, detailed conduct description, location, time, material evidence such as videos, messages or documents, description of how you found out about this wrongdoing, etc.

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7. Communication and Follow-Up

1. Bizagi will promptly acknowledge receipt of Whistleblower Reports, providing a contact person and ensuring confidentiality.
2. Bizagi will keep whistleblowers informed about the investigation's progress, challenges, and expected timelines.
3. After concluding the investigation, Bizagi will inform whistleblowers of the findings and any actions taken in response to the Report, ensuring transparency.
4. Whistleblowers can share feedback on the handling of their Report and investigation, helping Bizagi improve its processes.
5. Bizagi will safeguard whistleblowers' identities throughout the process, respecting their confidentiality under the law.
6. Bizagi will remind whistleblowers of its commitment to non-retaliation and promptly address any such issues.

8. Types of Conducts

This list encloses all the activities/actions that are considered important matters to disclose.

- Corruption (falsifying documents, bribes, nepotism, etc.)
- Criminal Offence (theft, revealing private information, damage to property, or any illegal activity)
- An act creating risk to Health and Safety
- An act causing damage to the Environment.

DISCLAIMER: Please bear in mind the list mentioned is not a limited list of possible conducts, any Act of wrongdoing, or conducts considered as mischievous or malicious can be disclosed in our channels.

9. Confidentiality

Bizagi will make every effort to protect the reporter's anonymity to the extent permitted by local law. Their integrity and name will be protected during the course of investigation unless there is a “need to know” basis executed by the local authorities or other compelling circumstances to continue or advance with the investigation in process.

While we strive to keep the reporter’s identity confidential and undisclosed to anyone involved in the procedural case, complete and absolute anonymity cannot be guaranteed due to potential risks of Bad Faith and Fake Disclosures.[2] Should confidentiality not be possible under specific circumstances, the reporter will be informed of the reasons.

[2] Please view our “Disciplinary Actions on Fake disclosures” for more information.

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10. Non-Retaliation

Bizagi will not take negative actions against any Reporter that has submitted a Qualifying Report in Good Faith. A Qualifying Report is defined as a report submitted in good faith that pertains to concerns or suspicions of unethical behaviour, legal violations, financial misconduct, or other serious breaches of company policy that require investigation. We will not intimidate, harass, discharge, transfer, terminate or have any negative attitude or adverse treatment.

We will ensure a safe environment for Reporters, fostering an honest, and safeguarded workspace. Other witnesses, or participants will be protected and remain anonymous during the process.

11. Disciplinary Actions on Fake Disclosures

- All Reports will be considered Acts of Good Faith, the employee will personally enforce the belief that the Acts witnessed are done in a negative matter for Bizagi and affect the company and its employees.
- Reporters who promote an investigation falsely accusing a third-party, or Bizagi of misconduct may be personally liable for such false accusations. These individuals maybe also be subject to disciplinary action, up to and including termination.
- Employees who engage in conduct that violates this Policy, will not have such actions considered part of their official job duties and will not be protected by their employment relationship with the Company.

Acknowledgment and Compliance:

Bizagi integrates this policy within its Code of Conduct and includes it in the onboarding training for all employees. While a separate acknowledgment of this policy is not required, employees are expected to understand and comply with its provisions as part of their overall commitment to Bizagi's standards and values.

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