



INL WHISTLEBLOWER POLICY

Concerning the whistleblower policy of the International Iberian Nanotechnology Laboratory (the INL).

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1. Introduction

- 1.1. The International Iberian Nanotechnology Laboratory (the INL') is an intergovernmental organisation created to perform interdisciplinary research, and to deploy and articulate nanotechnology for the benefit of society. INL aims to become the world-wide hub for nanotechnology addressing society's grand challenges.
- 1.2. INL is committed to upholding the highest standards of integrity, accountability, ethics and transparency in all its activities.
- 1.3. To preserve trust and ensure compliance with applicable regulations, INL has adopted this Whistleblower Policy.

2. Purpose

- 2.1. This Whistleblower Policy (hereinafter 'the Policy') provides a mechanism to report unethical, illegal, or improper conduct in a safe, confidential and secure manner and without fear of retaliation, in accordance with INL Statute, policies, regulations and standards.

3. Scope

- 3.1. This Policy applies to all INL members of the personnel, representatives of INL Member States, contractors, consultants and any other individuals associated with INL.
- 3.2. This policy also applies to individuals appointed by the INL Council, as they are expected to uphold the highest ethical standards in their roles and are equally subject to this Policy.
- 3.3. It covers infractions (the Infractions') related but not limited to:
 - a) Material violation of INL's Rules, Regulations, Policies, including, but not limited to: confidentiality, conflict of interest, health and safety, data privacy, whistleblower protection, procurement, code of conduct and workplace harassment or discrimination based on race, gender, sexual orientation, ethnicity, and disability;
 - b) Security of network and information systems;
 - c) Breaches affecting the protection of the European Union's financial interests, including mismanagement or misuse of funds;
 - d) Breaches relating to state aid rules;
 - e) Fraud, corruption, or financial misconduct, or
 - f) Any other unethical or improper conduct.

4. Reporting Channel

- 4.1. INL provides an Internal Whistleblowing Channel for reporting improper activities or irregularities, managed by an external software of easy-to-use, secure and confidential

access, the link to which is available on the INL HUB and INL website. This channel is not a channel for complaints, claims or suggestions and may only be used to report Infractions under this Policy.

- 4.2. Reports submitted to the Internal Whistleblowing Channel whose subject matter does not constitute an Infraction as defined in this Policy, will not be followed up within the scope of the Internal Whistleblowing Channel.

5. Principles to be followed when a Report is received

5.1. Independence and Autonomy

All reports of irregularities will be handled independently, impartially and autonomously. Individuals with a conflict of interest concerning the subject matter of the report shall be excluded from any investigative or decision-making processes to ensure fairness and objectivity.

5.2. Anonymity and Confidentiality

INL ensures that the Reporting Individual has the option to remain anonymous when submitting a report. Anonymity will not prevent investigators from contacting the Reporting Individual if necessary to obtain relevant information. INL will also maintain the strict confidentiality of all individuals involved, including the whistleblower and any parties mentioned in the report, throughout the entire process.

5.3. Protection Against Retaliation

No individual shall face threats, discrimination, retaliation, or adverse consequences for making a report under this policy. Members of the personnel who report concerns in good faith shall not be subject to dismissal, demotion, harassment, or any other negative employment action as a result of their disclosure. Any individual who retaliates against a whistleblower will face disciplinary measures, up to and including termination of employment, removal from governance roles, or exclusion from future engagement with INL.

5.4. Acting in Good Faith

All reports must be made in good faith and based on reasonable grounds to believe that a serious violation of applicable laws, regulations, or INL regulations and policies has occurred.

For employees, knowingly submitting false, reckless, or malicious allegations, particularly those made with gross negligence or intent to deceive, constitutes a serious disciplinary offense and will be addressed in accordance with the INL Staff Rules. For external individuals, where applicable, such misconduct may result in exclusion from future engagement with INL and civil or criminal liability.

- 5.5. If the person responsible for receiving the report has a conflict of interest, they will be excluded from the consideration of the report and any subsequent decision-making

processes. In such cases, the matter shall be referred to the Ombudsperson for independent review and appropriate action.

6. Procedure

6.1. The report may concern the following:

- (a) an infraction that has already occurred;
- (b) an infraction currently in progress;
- (c) an infraction reasonably expected to occur, or
- (d) an infraction being concealed or covered up.

6.2. Upon receiving a report through the Internal Whistleblower Channel, an investigation will be initiated. The responsible person for analysing the report will assess whether there are sufficient grounds and evidence to proceed with the investigation and, if the report is not made anonymously, the whistleblower will receive an acknowledgment of receipt within seven (7) days. If necessary, they may contact the whistleblower, unless the whistleblower has chosen to remain anonymous, in which case communication will be handled in a way that ensures their anonymity is preserved. If the investigation proceeds, the appropriate procedures will be followed to establish the facts.

6.3. Once the analysis and investigations has been completed a report must be prepared containing the following elements:

- (i) Description of the Internal whistleblowing report;
- (ii) Description of the investigative steps taken and the evidence analysed;
- (iii) Any existing limitations and their impact on the analysis and investigation phase;
- (iv) Result of the analysis and investigation carried out;
- (v) Recommended actions to mitigate the consequences caused by the Infraction.

6.4. The whistleblower may request the indication of the case's status and conclusions.

6.5. In cases involving an individual appointed by the Council, the report will immediately be referred to the Ombudsperson to ensure impartiality and independence in the investigation.

6.6. INL should keep a record of all communications of irregularities falling within the scope of this Policy. Information and personal data regarding communications and participations made pursuant to this Policy will be used exclusively for the purposes set forth herein.

7. Omissions and revision

- 7.1. This Policy shall be considered as part of the INL's Conduct of Conduct and its provisions should be treated as additional to INL regulations.
- 7.2. This Policy will be reviewed periodically to ensure alignment with international best practices and the INL's governance structure.

8. Entry into force

- 8.1. This Policy shall enter into force on the date of its adoption.