



# SoftwareOne

## ANNEX: Country Specific Reporting Provisions

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ANNEX: Country Specific Reporting Provisions  
Legal & Compliance

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# CONTENT

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1.	General provisions .....	3
2.	Country specific provisions .....	3

# ANNEX: Country Specific Reporting Provisions

## Legal & Compliance

### 1. General provisions

This Annex establishes the mandatory local provisions applicable to the reporting obligations for all full-time, part-time, or contracted employees, including but not limited to agency staff, secondees, and contractors who are engaged to do business with SoftwareOne, across jurisdictions of the European Union/Economic European Area (“Employees”).

Issues not addressed in this Annex are governed by the [SoftwareOne External Reporting Policy](#).

Any amendments or updates to the Integrity Line Reporting Policy shall automatically apply to this Annex.

In the event of any conflict between this Annex and the Integrity Line Reporting Policy, the latter shall prevail.

### 2. Country specific provisions

#### 2.1. Report submission

**2.1.1.** A Reporter has the right to report if he or she has reasonable grounds to believe that the conduct in question is an unlawful act with the characteristics of a criminal offence or an offence which the Reporter learned about in connection with work or similar activities, including but not limited to:

- financial services, statutory auditing and other assurance services, financial products and financial markets
- corporate income taxes
- prevention of money laundering and terrorist financing
- consumer protection
- compliance with product requirements, including product safety
- safety of transport, transport and road traffic
- environmental protection
- food and feed safety, animal protection and health
- radiation protection and nuclear safety
- competition, public auctions and public procurement
- protection of internal order and security, life and health
- protection of personal data, privacy and security of electronic communications networks and information systems
- protection of the financial interests of the European Union

- functioning of internal markets, including the protection of competition.

**2.1.2.** All reporting should be conducted in accordance with the procedures outlined in the Integrity Line Reporting Policy, ensuring consistency, confidentiality, and compliance with established guidelines.

## **2.2. Investigation process**

**2.2.1.** The Reporter shall be notified in writing of the receipt of the report in any case not later than 7 days from the date of receipt of the report.

**2.2.2.** The Reporter shall be notified in writing of the results of the investigation within 30 days from the date of receipt of the report for the countries listed in the table below. In these cases and where there is factual or legal complexity, this period may be extended by up to 30 days, but no more than twice. The reporter shall be notified in writing of the extension of the deadline and the reasons for the extension before it expires. The outcome of the investigation can also be withheld, if the investigation results contain private and confidential information of persons involved.

**2.2.3.** For the countries listed in the table below, the Reporter shall be notified in writing of the outcome of the internal investigation immediately after it has been completed, but no later than 90 days from the date of receipt of the Report. In case of involvement of external advisors, service providers, authorized state authorities and administrative bodies, the outcome of the investigation can be withheld.

**2.2.4.** The records of the report shall be kept for as long as necessary, up to a maximum of 5 years.

**2.2.5.** If the circumstances of the report so require, the submitted report shall be sent to the relevant authorities for processing, i.e. e.g. law enforcement authorities or administrative authorities.

## **2.3. Reporting mechanisms**

**2.3.1.** To encourage and facilitate communication, SoftwareOne further offers additional ways to report wrongdoings. SoftwareOne may designate a Local Integrity Officer responsible for receiving, processing, and handling reports. If the Local Integrity Officer is unavailable and if a Deputy Local Integrity Officer is appointed, he or she will take over responsibilities during the absence.

**2.3.2.** Local Integrity Officer/ Deputy Local Integrity Officer will be supported and guided by SoftwareOne Legal and Compliance.

**2.3.3.** Reporters may also submit reports of misconduct to the relevant [external authority](#) tasked with handling such matters within their respective jurisdictions.

**2.3.4.** If the Reporter submits a report by telephone or in person, the Local Integrity Officer(s) and/or Deputy Local Integrity Officer(s) are obliged to make a written record of the call or meeting and must submit the same to the Reporter in writing to agree on the wording.

**2.3.5.** The Local Integrity Officer(s) and/or Deputy Local Integrity Officer(s) are responsible for all records/reports and other internal reports collected, stored and updated in the electronic registry on the Integrity Line.

**2.3.6.** Details of the country-specific reporting mechanisms:

Country/Entity	Email	Telephone	In writing address	Local Integrity Officer	Deputy Local Integrity Officer	External reporting Authorities
<b>Bulgaria /</b> SoftwareONE Bulgaria EOOD		+35980046338	1784 Sofia, 141 Tsarigradsko Shose Blvd., floor 2.	Kostova Ralitsa		Commission for Personal Data Protection. The public authorities reporting contacts can be found here: <a href="https://cpdp.bg/en/contacts/">https://cpdp.bg/en/contacts/</a>
<b>Czech Republic /</b> SoftwareONE Czech Republic s.r.o.		+420 775 617 711	Vyskočilova 1410/1, Michle, 140 00 Praha 4	Michaela Morongova	Katarina Krulova	Ministry of Justice The public authorities reporting contacts can be found here: <a href="https://oznamovatel.justice.cz/chci-podat-oznameni/">https://oznamovatel.justice.cz/chci-podat-oznameni/</a>
<b>Italy /</b> SoftwareOne Italia S.r.l.		+39800122710	Centro Direzionale Milanofiori, Strada 2, Palazzo C 20057 Assago (MI)	Davide Criscuolo		<b>Central Reporting Channel</b> <a href="http://www.anticorruzione.it">Whistleblowing - www.anticorruzione.it</a> Additional Reporting Channels  <a href="http://www.bancaditalia.it">Banca d'Italia - Il sito ufficiale della Banca Centrale Italiana (bancaditalia.it)</a>
<b>Italy / Systematika Distribution S.r.l.</b>			Via Gioacchino Rossini, 1/A, 20045 Lainate MI, Italia			www.consob.it (Commissione Nazionale per le Società e la Borsa – CONSOB) Institute for the Supervision of Insurance (Istituto per la Vigilanza sulle Assicurazioni – IVASS)
<b>Poland /</b> SoftwareOne Polska sp. z o.o;			9 Siedmiogrodzka Street, 01-204 Warsaw	Monika Drabek	Maciej Skura	Ombudsman for Human Rights The public authorities reporting contacts can be found here:

Predica sp. z o.o.			9 Siedmiogrodzka Street, 01-204 Warsaw	Urszula Banasik	Patrycja Bielecka	<a href="https://bip.brpo.gov.pl/pl/content/zlozenie-wniosku-do-rzecznika-praw-obywatelskich">https://bip.brpo.gov.pl/pl/content/zlozenie-wniosku-do-rzecznika-praw-obywatelskich</a>
<b>Romania /</b> SoftwareONE Licensing Experts S.R.L.			Bucharest, 3rd district, 6-8 Corneliu Coposu Blvd., 7th floor	Ioana Moisescu	Carmen Manole	National Integrity Agency The public authorities reporting contacts can be found here: <a href="https://integritate.eu/">https://integritate.eu/</a>
<b>Spain /</b> SoftwareOne Spain			Parque Empresarial Cristalia - C/ Via de los Poblados 3, Edif. 4b, 1° plant 28033 Madrid			