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1. Purpose

Final approval of the regulations as per Law 30 November 2017, no. 179 containing “provisions for the protection of authors of reports of crimes or irregularities of which they have gained knowledge within the sphere of public or private employment” (more commonly referred to as “whistleblowing”) has had a strong effect on the communication channels for reporting violations regarding the administrative liability of entities, and for the creation of protective systems regarding those that report conduct deemed not to conform to the Model, or even illegal.

In implementation of the above, the purpose of this procedure is to set up a system suitable for protecting those who report crimes or irregularities of which they have gained knowledge for work reasons and/or as a result of their activities, that is, even accidentally, so as to facilitate the dissemination of a widespread awareness of the requirement to comply with the indications issued by the organisation and by the law. This procedure therefore aims to encourage individuals to take action to make reports without fearing any retaliation or, in any event, prejudicial consequences in their personal or working lives.

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The procedure aims, moreover, to remove possible factors that might dissuade reporting, such as doubts and uncertainties regarding:

- the procedure to follow;
- fears of retaliation or discrimination on the part of company management, hierarchical superiors or colleagues;
- the risk of revealing professional, corporate, professional, scientific or industrial secrets.

From this point of view, the approach taken by this procedure is that of providing the whistleblower with clear operating indications regarding the subject matter, contents, recipients and means of transmission of reports, as well as the forms of protection offered by our legal system.

2. Individuals/entities involved


This procedure applies to all individuals/entities involved in the organisation's activities, including third parties and related parties. Reporting must be based on good faith and on a reasonable belief in the congruence of the report: for this reason, reports are required to be adequately detailed.

All reports received, in the form and in the ways described below, shall be processed by the S.B. in the implementation of this procedure. Anonymous reports, that is to say, lacking means of identification of the author, sent in the ways foreseen by this document, are included in the field of application. Anonymous reports shall, however, be processed only if referring to significant episodes and in the presence of clear, detailed, precise and concordant elements.

The requirement for the truthfulness of the facts or situations reported remain, with a view to the protection of the reported party.

3. Responsibility

Responsibility for the process is attributed to the CEO, who will make necessary resources available for:

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- guaranteeing the retention and privacy of the original documentation relating to reports in specific paper/computerised archives, with the highest standards of security/confidentiality;
- monitoring channels of communication;
- evaluating approval of requests for the adoption of organisational measures and/or the imposition of disciplinary measures and/or the initiation of legal action:
- updating and making available reporting (whistleblowing) forms.

As part of the system for managing the enterprise's administrative liability, responsibility for the process for managing reports are attributed to the S.B. which


- is the recipient of the reports;
- has the task of evaluating the contents;
- keeps the report register up to date;
- carries out necessary enquiries and investigations for the purpose of confirming or otherwise what is indicated in the reports;
- refers directly to the CEO on the outcome of the assessment and investigation process regarding the alleged illegal acts and/or violations of the Model, so that the latter can adopt the disciplinary measures deemed applicable, as well as any corrective actions necessary for implementation of the Model.

As part of the above, the S.B. may not, in any way, refer the identity of the whistle-blower, nor communicate information or supporting evidence such as to be traceable to them: violation of this rule constitutes violation of the Model on the part of the S.B. This is without prejudice to the exceptions referred to in this procedure.

4. Operating procedures: protection of the reporter ("whistle-blower")

The information gathered through the report and/or subsequent investigations are strictly confidential, with the exception of cases in which:

- the whistle-blower him/herself wishes their personal data to be disclosed: in this case, consent must be given in voluntary and documented, free and specific form;
- disclosure is necessary, being imposed by law (for example, because the gravity is such as to necessitate the involvement of the judicial authorities);

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- it is indispensable for the defence, during the deposition of the reported party, for the purpose of presenting a defence statement: in this case, indispensability must be amply motivated and demonstrated by the reported party;
- the report is unfounded and therefore gives rise to the possibility of liability on the part of the whistleblower for slander and defamation.

Non-authorized disclosure of the identity of the whistle-blower or of information on the basis of which his/her identity may be deduced constitutes a violation of this procedure and is a motive for disciplinary liability, without prejudice to other forms of liability foreseen by the legal system.

5. Information classed as confidential

In the context of the reporting of illegal actions and/or violations of the system for the management of administrative liability, the company recognises the protection of employees in the event of the disclosure of information covered by the obligation of professional, corporate, professional, scientific and industrial secrecy, provided that said disclosure occurs only and exclusively in relation to the S.B. and, therefore, within the limits of what is strictly useful for the purpose of the report.


6. Prohibition of retaliation or discrimination

The organisation condemns any form of retaliation and/or discrimination with respect to whistleblowers.

The following, by way of example, are considered as acts of retaliation and/or discrimination:

- unjustified disciplinary actions (demotion, failed promotion, transfer, dismissal, etc.)
- harassment in the workplace (mobbing, persecution, etc.)
- any other form of retaliation that leads to intolerable working conditions (isolation, threats, etc.)

Furthermore, the whistle-blower has the right to request a transfer to another office and, where reasonably possible, the Organisation shall seek to satisfy such requests.

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Protection is limited to cases in which the whistle-blower and the reported party are both employees of the same Organisation.

An employee who believes to have been subject to discrimination for having made a report will refer the fact to the S.B. which, having substantiated the facts, refers them to the Management so they may adopt the necessary measures to remedy the consequences of the discrimination, as well as enforcing disciplinary measures against the author of the retaliatory/discriminatory behaviour. In the event the retaliatory/discriminatory behaviour is attributed to the CEO, the S.B. reports the situation to the Chairperson of the B.o.D. so that they may adopt suitable measures to protect the whistle-blower, as well as disciplinary measures to be taken by the Management. This procedure is without prejudice to the criminal and disciplinary liability of the whistle-blower in the event of a slanderous or defamatory report pursuant to the penal code and art. 2043 of the Italian Civil Code. Any forms of abuse of this procedure with the aim of damaging the reported party or for opportunistic aims shall also imply liability in disciplinary and other relevant contexts.


7. Methods of reporting

The Organisation makes available to all interested parties:

- the reporting form;
- instructions for reporting;
- the privacy policy.

The form, instructions and privacy policy are made available, updated and transmitted by the General Coordination and Administration Department as instructed by the CEO to all interested parties. The documentation is, however, obtainable at all times through the company intranet. The report must be addressed to the Supervisory Body.

A report received by any other individual/entity of the Organisation must be forwarded immediately to the S.B. in the original version together with any attachments. An individual/entity other than the S.B. that has received the report is not authorised to examine the contents of the

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report and must cancel their copy of it so as not to prejudice the obligation to ensure maximum confidentiality regarding the identity of the whistle-blower and the subject matter of the report.

Transmission of the report must occur in compliance with the criteria of maximum confidentiality and with appropriate ways to protect the whistle-blower and the identity and honourability of the reported parties, without prejudice to the effectiveness of subsequent verification activities.

The Organisation may use a number of channels for transmitting reports, provided they guarantee full confidentiality and protection of the whistle-blower.

8. Contents of reports

The following are the channels considered suitable for ensuring the confidentiality of the identity of the whistle-blower in the management and processing of the report:


- a) sending by electronic mail to the S.B. e-mail address;
- b) sending by registered letter to the attention of the S.B. at their office;
- c) a verbal interview with the S.B.: in this case, the S.B. shall draw up a record of the declaration according to Mod. 04 and may ask necessary questions in order to ascertain the exact nature of the reported violation.

In the event that the whistle-blower prefers to remain anonymous also with respect to the S.B., he/she may:

- not complete the “whistle-blower’s personal details” on the form;
- not undersign the form;
- not indicate the sender or use a pseudonym or a made-up name.

If the report is received by computerised means, the S.B. shall inform the whistle-blower:

- of having taken charge of the report;
- of any need to re-contact them in order to acquire further elements useful to investigations and their management;
- of the possibility to add to or update the facts referred to in the initial report if further information comes to light or if the whistle-blower subsequently remembers facts considered useful for substantiating the report more fully.

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The contents of reports must be precise and consistent. To this end, a report must contain the following elements:

- a) the general details of the person making the report, with indication of their position or role in the organisation;
- b) a clear and complete description of the facts subject to reporting;
- c) details of the time and place in which said facts occurred;
- d) other elements that make it possible to identify the individual(s)/entity(ies) perpetrating the facts reported;
- e) indication of other individuals/entities that could provide information on the facts subject to reporting;
- f) indication of documents that could confirm the grounds of said facts;
- g) any other information that could provide useful verification of the subsistence of the facts reported.

The organisation has drawn up a specific form (Mod. 01) to help the whistle-blower and to encourage completeness of the reports.

9. Dissemination of this procedure


This procedure is disseminated as widely as possible and is made available on the company intranet by the Administration department, as indicated by the CEO, ensuring:

- the availability, maintenance and updating of said documentation;
- the transmission of the whistleblowing form, the operating instructions and the relative privacy policy.

For new employees, the General Coordination and Administration Department ensures delivery and receipt of this procedure upon joining the organisation.

10. Registration

In order to ensure the management and traceability of the reports, the S.B. keeps a specific Register of reports, ensuring their storage and that of the documentation relating to investigations in a suitable place and, in any case, not on the company's premises.

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The personal data collected in relation to a report are stored for the time strictly necessary for their processing and, in all events, compatible with the purpose of the processing, in compliance with the provisions of the Management System for the protection of personal data as specified in the related privacy policy made available pursuant to art. 13 EU Reg. 679/16.

11. Related documentation

Mod. 01 - Whistleblowing: report form

Mod. 02 - Whistleblowing: register of reports

Privacy policy pursuant to art. 13 EU Reg. 679/16 with respect to whistle-blowers (ref. Personal data processing management system).