

WHISTLEBLOWING POLICY

Adopted by the Board of Directors on 02/10/2023

Version	Date	Drafted by	Approved by	Description of updates
01	02/10/2023	Whistleblowing Committee	B.o.D.	First version

TABLE OF CONTENTS

1. FOREWORD	3
2. DEFINITIONS	4
3. REFERENCES	6
4. THE REPORTING PERSONS	6
5. SUBJECT OF THE REPORT	8
6. REPORTING IN GOOD OR BAD FAITH	9
6.1 Reporting in good faith	9
6.2 Reporting in bad faith	9
7. THE REPORTING PROCESS	10
7.1 Operating modes	10
7.2 Content of the Report	11
8. RECIPIENTS OF THE REPORT	12
9. PROTECTIONS FOR THE REPORTING PERSON	13
10. MEASURES FOR THE PROTECTION OF THE REPORTED PERSON	17
11. THE WAY THE REPORT IS HANDLED	17
12. SANCTIONS	22
13. PROCESSING OF PERSONAL DATA	23
14. UPDATE	24
15. DISSEMINATION, INFORMATION AND TRAINING	24

1. FOREWORD

On 15 March 2023, (It.) **Legislative Decree no. 24/2023** (hereinafter also referred to as the “**Whistleblowing Decree**” or just the “**Decree**”) implementing Directive (EU) 2019/1937 on the protection of persons who report breaches of European Union law and laying down provisions concerning the protection of the reporting persons (so-called Whistleblowers) was published in the Official Journal.

“Whistleblowing”, in particular, refers to the reporting of conduct, acts or omissions in violation of the provisions of the Organisation, Management and Control Model pursuant to (It.) Legislative Decree no. 231/2001 and of the Code of Ethics or of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or the private entity, carried out by a person who has become aware of it in the context of his or her public or private work context.

In light of the above, this document (hereinafter referred to as the “**Whistleblowing Policy**” or “**Policy**”) is intended to illustrate the tools that can be used, within the corporate context, to report unlawful conduct.

Therefore, the purpose of the Policy is:

- identify the persons who may submit reports;
- circumscribe the perimeter of conduct, events or actions that may be subject to reporting;
- identify the channels through which reports can be made;
- describe the operational modalities for the submission and handling of reports, as well as for any subsequent determination activities;
- inform the Reporting Person and the Reported Person of the forms of protection that are recognised and guaranteed.

It should be noted that, in drafting this Policy, the Company has taken into account the values that form the foundations of its organisation and is committed to carrying out its activities according to the highest standards of fairness, ethics, legality, transparency, responsibility, and business integrity.

The principles set out in this Policy do not prejudice or limit in any way the obligations to submit official complaints to the competent Judicial, Supervisory or Regulatory Authorities in the countries in which the Company operates, nor those of reporting to any supervisory bodies that may be set up within the Company, but aim to strike a fair balance between the legitimate interests of the Company in preventing unlawful conduct, and the fundamental rights of its employees and in general of the addressees of the Policy, in particular as regards the processing of personal data concerning them.

2. DEFINITIONS

For the purposes of this Policy, the terms listed shall have the meaning specified below:

Code of Ethics	A document with which the Company affirms, in implementation of the values of legality, loyalty, honesty, and professionalism, the principles and rules of conduct that its employees, the members of its administration and control bodies, suppliers, consultants, partners and those who have relations, directly or indirectly, permanently or temporarily with it, are required to comply with when carrying out their activities on its behalf.
Recipients	Employees of the Company hired on an indefinite and fixed-term basis (executives, middle management, white collar workers, blue collar workers), directors, members of corporate bodies and supervisory bodies, as well as all those who, for various reasons, have employment, collaboration or business relations with the Company, including collaborators, trainees, temporary workers, consultants, agents, suppliers, clients and business partners, even before the legal relationship with the Company began or after it was terminated (as indicated in par. 4).
Public disclosure	Placing information about violations in the public domain through the press or electronic media or otherwise through means of dissemination capable of reaching a large number of people.
Facilitator	Person assisting the Reporting Person in the reporting process, operating within the same work context and whose assistance is kept confidential.
Model 231	Organisation, Management and Control Model adopted by the Company, which lays down a structured and organic system of principles, internal rules, operating procedures and control activities, adopted for the purpose of preventing conduct liable to give rise to the types of crimes and offences envisaged by (It.) Legislative Decree no. 231/2001.

Supervisory Body ("SB")	The Supervisory Body of the Company appointed pursuant to (It.) Legislative Decree no. 231/2001.
Reporting Person	A natural person who makes internal or external reports or public disclosures of information about violations acquired in the context of his or her work.
Reported Person	Person mentioned in the internal or external report, or in the Public Disclosure, understood as the person to whom the violation is attributed or as a person otherwise implicated in the reported or publicly disclosed violation.
Reporting	Written or verbal communication of information on violations, including reasonable suspicions concerning violations committed or likely to be committed, as well as elements concerning conduct aimed at concealing such violations.
Anonymous reports	Reports lacking elements that would make it possible to identify their author.
External report	Written or verbal communication of information on violations submitted through the external reporting channel referred to in par. 7.1 b.
Reports in bad faith	Any communication received by the Company which proves to be unfounded on the basis of objective elements and which proves, again on the basis of objective elements, to have been made for the purpose of causing unjust damage.
Internal report	Written or verbal communication of information on violations, submitted through the internal reporting channel referred to in par. 7.1 a.
Not relevant report	Any communication received by the Company concerning conduct that does not constitute a violation. All those communications received by the Company which, on the basis of the vagueness of their contents, do not make it possible to carry out adequate checks, are also considered as not relevant reports.

Violations	Conduct, acts or omissions detrimental to the public interest or the integrity of the Company and consisting of the conduct referred to in par. 5.
-------------------	--

3. REFERENCES

Below are the main references relevant to this Policy:

- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law;
- Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”);
- (It.) Legislative Decree of 10 March 2023 no. 24 “Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and on provisions concerning the protection of persons who report breaches of national laws”;
- ANAC [Italian Anti-Corruption Authority] guidelines on the protection of persons reporting violations of union law and protection of persons reporting violations of national law provisions. Procedures for the submission and management of external reports, approved by Resolution No. 311 of 12 July 2023;
- (It.) Legislative Decree 8 June 2001 no. 231, “Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality”;
- Opinion on the Draft Guidelines on the protection of persons who report breaches of Union law and the protection of persons who report breaches of national laws - procedures for the submission and handling of external reports - 6 July 2023 - [9912239];
- Organisation, management and control model adopted pursuant to (It.) Legislative Decree of 8 June 2001 no. 231 adopted by the Company;
- Code of Ethics adopted by the Company.

4. THE REPORTING PERSONS

In accordance with Art. 3 of the Whistleblowing Decree, reports may be submitted by the following persons, i.e. the Reporting Persons:

- the Company’s employees, including workers with a part-time, intermittent, fixed-term, temporary employment contract, apprentices, ancillary work employment contract, casual workers, etc.;

- self-employed workers and holders of a collaboration relationship who work for the Company;
- workers or collaborators of the Company, who supply goods or services or perform works for third parties;
- the Company's freelancers and consultants;
- volunteers and trainees, paid and unpaid;
- shareholders and persons with administrative, management, control, supervisory or representative powers in the Company, even if such powers are exercised on a de facto basis;
- persons whose legal relationship with the Company has ended, when information on violations has been acquired in the course of said legal relationship;
- those who acquired the information on violations during the probation period;
- persons whose legal relationship with the Company has not yet begun, when information on violations has been acquired during the pre-contractual stages or in the selection process.

The Company, in line with the provisions of Art. 3, paragraph 5 of the Whistleblowing Decree, guarantees the protection and safeguard not only of the Reporting Persons, as referred to above, but also of persons assisting the Reporting Person during the whistleblowing process, such as Facilitators, whose identity is kept confidential, as well as of persons connected with the Reporting Person, such as colleagues/family members, i.e. persons from the same work context who are linked to the Reporting Person by a stable emotional or family relationship up to the fourth degree, or persons from the same work context who have regular and current relations with the Reporting Person.

The Company also guarantees the protection of entities owned by the reporting person or for which the reporting person performs work, as well as entities operating in the same work environment as the aforementioned person.

To this end, the Reporting Person is invited to expressly indicate the name and role of such persons (e.g. Facilitator, colleague bound by a stable emotional or kinship link up to the fourth degree, etc.), attaching the documentation supporting the link with him or her.



5. SUBJECT OF THE REPORT

Pursuant to art. 2, paragraph 1, letter a) of the Whistleblowing Decree, a report may have the following subjects:

- unlawful conduct relevant within the meaning of (It.) Legislative Decree of 8 June 2001, no. 231, or violations of the organisation and management models adopted pursuant to the aforementioned legislative measure (hereinafter “Model 231”);
- violations of EU law¹.



Reports concerning facts other than those described above are not admissible. Therefore, in the event of the submission of reports whose content differs from that set out in this Policy, such reports will be deemed unenforceable and will be rejected by the Whistleblowing Committee, the entity in charge of managing the internal reporting channel.

In particular, the following reports are not worthy of protection and are therefore **prohibited**:

	reports concerning disputes, claims or demands of a personal nature that relate exclusively to labour relations or relations with hierarchical superiors or colleagues;
	reports containing personal insults or moral judgments and intended to offend or harm the personal and/or professional honour and/or decorum of the person or persons to whom the reported facts relate;

¹ To be understood as:

- offences falling within the scope of European Union or national acts relating to the following areas:
 - public procurement;
 - financial services, products and markets and the prevention of money laundering and terrorist financing;
 - product safety and conformity;
 - transport safety;
 - protection of the environment;
 - radiation protection and nuclear safety;
 - food and feed safety and animal health and welfare;
 - public health;
 - consumer protection;
 - protection of privacy and protection of personal data and security of networks and information systems.
- acts or omissions affecting the financial interests of the European Union, as well as those affecting the internal market, including violations of EU competition and state aid rules, as well as violations affecting the internal market related to acts in breach of corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law (art. 2, paragraph 1, no. 5));
- acts or conduct that frustrate the object or purpose of the above provisions.

	reports based on mere suspicions or rumours concerning personal facts not constituting an offence;
	reports of a purely defamatory, slanderous or discriminatory nature, in so far as they refer to the sexual, religious or political orientation or to the racial or ethnic origin of the Reported Person.

The Report must be made in good faith and must be as circumstantial as possible, i.e. made in sufficient detail to enable the Whistleblowing Committee to determine the facts reported. To this end, reports must have a minimum content, i.e. contain at least the elements indicated in the following paragraphs.

6. REPORTING IN GOOD OR BAD FAITH

6.1 Reporting in good faith

The Reporting Person is encouraged to make reports only after obtaining **sufficiently comprehensive information** that leads him or her to believe that it is highly likely that the violation is occurring or has occurred and that the Reported Person has committed it.

The reports should be as circumstantial as possible and provide as much information as possible, so that the necessary checks can be carried out and appropriate feedback obtained.

After having made a report, the Reporting Person who detects any errors may immediately notify them through the same channel through which the report was submitted.

6.2 Reporting in bad faith

Reports shall be deemed to have been made in bad faith if they prove to be **deliberately** false or unfounded, with defamatory content or in any case concerning **deliberately** erroneous or misleading information for the sole purpose of damaging the Company, the reported person or other persons concerned by the report.

In such a case, the Company reserves the right to take appropriate action - including the adoption of appropriate disciplinary sanctions - against the Reporting Person.

7. THE REPORTING PROCESS

7.1 Operating modes

The reports must be submitted using one of the reporting channels made known to the Recipients of this Policy.

a. Internal reporting channels

In accordance with the provisions of Art. 4 of the Whistleblowing Decree, the Company has set up internal reporting channels that make it possible to submit reports in writing or verbally.

Reporting can be done through:

- **IT platform:** the Reporting Persons will be able to send their reports via a dedicated IT platform, which each Reporting Person can access via the following address www.ictgroup.net/whistleblowing/ictspa;
- **Voice messaging systems:** the Reporting Persons will be able to transmit their report by leaving a voice message via the appropriate section of the IT Platform.

At the Reporting Person's request, a **face-to-face meeting** may be arranged with at least two of the members of the Whistleblowing Committee. For this purpose, the Reporting Person must send his or her request for a meeting by the means provided for written reports.

In the event that the Reporting Person mistakenly sends the report through alternative channels, the confidentiality of the identity of the Reporting Person and the protection of the data of all persons concerned must be ensured.

b. External reporting and Public Disclosure

The Reporting Person may submit reports concerning breaches of European Union law and national transposing legislation (as detailed in par. 5), including through the external channel, public disclosure or official complaint.

In particular, the Reporting Person may submit his report to **ANAC** (Italian National Anti-Corruption Authority) through the external reporting channel made available by that Authority if:

- he or she has already made an internal report and it was not followed up;
- he or she has reasonable grounds to believe that, if he or she were to make an internal report, it would not be effectively followed up, or that the report itself might give rise to the risk of retaliation;
- he or she has well-founded reasons to believe that the infringement may constitute an imminent or obvious danger to the public interest.

The Reporting Person may proceed by way of **Public Disclosure** if:

- he or she has already made an internal and external report, or has made an external report directly and received no feedback;
- he or she has well-founded reasons to believe that the infringement may constitute an imminent or obvious danger to the public interest;
- he or she has well-founded reasons to believe that, due to the specific circumstances of the case, the external report may entail a risk of retaliation or may not be effectively followed up.

c. Anonymous reporting

The use of anonymous forms of reporting is allowed, where the identity of the Reporting Person is not made explicit or identifiable thereby.

Anonymous reports are submitted using the method described under a) above.

However, this method of reporting is not encouraged by the Company because of the difficulties that may be encountered during the investigation phase and which require the cooperation of the Reporting Person.







Anonymous reports are therefore allowed provided they are sufficiently substantiated and contain sufficient factual elements to trigger an investigation (on the content of the report, see Section 7.2 below, “Content of the report”).

7.2 Content of the Report

Whistleblowing reports must, in any case and regardless of the method used, be **circumstantiated and based on precise and consistent factual elements**, so as to enable the Whistleblowing Committee to take the necessary measures and carry out the appropriate checks and in-depth investigations, including by carrying out investigations and formulating requests for clarifications to the Reporting Person, where identified.

The Reporting Person may allow him- or herself to be identified, indicating his or her name and, in order to facilitate the handling of the report, his or her contact details (e-mail address, telephone number).

What must the report contain?

	in the case of a non-anonymous report, in order to facilitate the handling of the report, the identification data of the reporting person;
	a clear and complete description of the facts that are the subject of the report;
	personal details or other elements making it possible to identify the persons who committed the breach and to whom the report relates;
	circumstances of time and place, if known, relating to the subject of the report;
	any further information deemed useful for the investigation of the report;
	documentary or evidentiary attachments in support of the report, including the indication of witnesses or persons who may be able to report on the facts that are the subject of the report.

8. RECIPIENTS OF THE REPORT

The Company has set up its own internal reporting channels, which guarantee, also through the use of encryption tools, the confidentiality of the Reporting Person's identity, that of the Reported Person and of any persons involved, as well as of the content of the report and of the documentation attached to it.

This Policy ensures that the report is known to a limited number of persons and that only authorised persons have access to the documents relating to the report. In particular, in ensuring proper handling of reports and in line with the provisions of art. 2, paragraph 4 of the Whistleblowing Decree, the Company has entrusted the management of reporting channels to the Whistleblowing Committee, composed of autonomous and impartial staff specifically trained for the management of the reporting channels belonging to the following departments: Human Resources, Risk Management, Finance.

Reports of unlawful conduct relevant under (It.) Legislative Decree of 8 June 2001, no. 231, or violations of the Model 231 received through the above-mentioned reporting channels will be forwarded by the Whistleblowing Committee to the Supervisory Body and processed by the latter in accordance with this Policy, the SB sharing the results of its investigations with the Whistleblowing Committee for the latter to provide feedback to the Reporting Person.

In the event of a conflict of interest between one or more of the members of the Whistleblowing Committee and the Reporting Person (i.e., where the Committee member is the same as the Reporting Person, the Reported Person or is otherwise a person involved in the report), the report must be addressed to the Board of Directors by registered letter to be sent to the following address: Industrie Cartarie Tronchetti S.p.A. Sede di Diecimo Località Baccanella, 55023 Borgo a Mozzano, Lucca.

In this case, the Reporting Person must place the report in two envelopes: the first containing his or her identification data together with a copy of his or her identity document; the second containing the report. Both envelopes must then be placed in a third sealed envelope marked “Confidential, to the attention of the Board of Directors” on the outside.

9. PROTECTIONS FOR THE REPORTING PERSON

The protections afforded to the Reporting Person can only be guaranteed by the Company if the instructions provided in the Policy are complied with. No protection is granted to the Reporting Person in the event that he or she has contributed to the commission of the unlawful conduct.

The Reporting Person must specify that he or she wishes to keep his or her identity confidential and to benefit from protection from possible retaliation.

The protections afforded to the Reporting Person also extend:

- to the Facilitator;
- to persons in the same work environment as the Reporting Person with a stable emotional or family link up to the fourth degree;
- to the Reporting Person’s work colleagues with whom he or she has a regular and current relationship;
- to the entities owned by the Reporting Person or for which the Reporting Person works, as well as entities operating in the same employment context.

The Reporting Person may at any time withdraw the report by means of a notice to be sent through the channel originally chosen for submitting the report. In this specific case, any investigations already started as a result of the report will stop, unless they concern matters that can be proceeded with ex officio.

a. **Confidentiality**

In setting up and implementing its internal reporting channels, the Company guarantees the **confidentiality of the identity of the Reporting Person, that of the Reported Person and of any other persons involved, as well as of the content of the report and of the relevant documentation**, including through the use of encryption tools. The reports may not be used beyond what is necessary to adequately follow them up.

The identity of the Reporting Person and any other information from which it can be deduced, directly or indirectly, may not be disclosed, without the express consent of the Reporting Person him- or herself, to persons other than those competent to receive and follow up the reports and expressly authorised to process such data², in accordance with the provisions of Articles 29 and 32 of the GDPR and Art. 2-*quaterdecies* of the (It.) Privacy Code

The Whistleblowing Committee is required to treat personal data with the utmost caution and in compliance with the obligation of confidentiality, obscuring both those relating to the Reporting Person and those of other persons whose identity under (It.) Legislative Decree 24/2023 must be kept confidential (e.g. the Facilitator, the Reported Person, the other persons mentioned in the report), if, for investigative reasons, consultants and/or corporate departments and/or the SB need to be made aware of the content of the report and/or of the documents annexed thereto.

Where it is necessary for investigative reasons to share the personal data contained in the report with the aforementioned persons, the Whistleblowing Committee must first obtain the Reporting Person's consent. The other corporate departments, the Supervisory Body and the external consultants involved in the handling of the report are required to guarantee the confidentiality obligations laid down in (It.) Legislative Decree no. 24/2023 to which the Whistleblowing Committee is subject. To this end, the Company shall include appropriate contractual clauses in the agreements concluded with external consultants.

² In addition:

- express forms of protection of the identity of the Reporting Person are provided for in criminal proceedings, before the Court of Auditors and in disciplinary proceedings (in the latter case, the identity of the Reporting Person may not be disclosed when the accusation of the disciplinary charge is based on investigations that are separate and additional to the Report, even if consequent thereto);
- within the framework of disciplinary proceedings, if the charge is based, in whole or in part, on the Report, and knowledge of the identity of the Reporting Person is indispensable for the defence of the Reported Person, the Report will be usable for the purposes of the disciplinary proceedings only if the Reporting Person expressly consents to the disclosure of his or her identity. In any case, the Company shall inform the Reporting Person, by written communication, of the reasons why it is necessary to disclose confidential data, or when the disclosure of the Reporting Person's identity is also indispensable for the defence of the person involved in the Report;
- the Report file is exempt from the right of access provided for in Art. 22 et seq. of (It.) Law 241/1990, as well as in Art. 5 et seq. of (It.) Legislative Decree 33/2013.

Within the framework of the disciplinary proceedings instituted by the Company against the alleged perpetrator of the reported conduct, the identity of the Reporting Person may not be disclosed, where the allegation of the disciplinary charge is based on investigations that are separate from and additional to the report, even if consequent thereto.

If, on the other hand, the accusation is based, in whole or in part, on the report and the identity of the Reporting Person is indispensable for the defence of the accused, the identity of the Reporting Person will be usable for the purposes of the disciplinary proceedings only if the Reporting Person has expressly consented to the disclosure of his or her identity. In such cases, prior notice shall be given to the Reporting Person in writing of the reasons making it necessary to disclose the confidential data.

If the Reporting Person denies his or her consent, the report cannot be used in the disciplinary proceedings.





b. Prohibition of retaliation and protection measures











The Company **does not tolerate any kind of threat, retaliation, unjustified sanction or discrimination** against the Reporting Person and the persons involved, e.g. the Facilitator, the colleagues/family members and entities referred to in par. 4), the Reported Person and those who have cooperated in the verification activities with regard to the merits of the report. The adoption of discriminatory or retaliatory measures against the Reporting Person may give rise to disciplinary proceedings against the person responsible.

Retaliatory acts taken in violation of this Policy are null and void.

In light of the provisions of art. 19, paragraph 1 of the Whistleblowing Decree, the Reporting Person remains free to inform the ANAC (National Anti-Corruption Authority) of the retaliation he or she believes he or she has suffered within his or her work context in connection with the report.

Examples of retaliatory conduct include, but are not limited to:

	dismissal, suspension or equivalent measures
	downgrading or non-promotion
	change of duties, change of workplace, reduction of salary, change of working hours
	suspension of training or any restriction of access to it

	demerit notes or negative references
	the adoption of disciplinary measures or other sanctions, including fines
	coercion, intimidation, harassment or ostracism
	discrimination or otherwise unfavourable treatment
	non-renewal or early termination of a fixed-term employment contract
	damage to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and/or loss of income
	inclusion on blacklists, on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future
	early termination or cancellation of the contract for the supply of goods or services
	cancellation of a licence or permit
	the request to undergo psychiatric or medical examinations

The protections afforded to the Reporting Person can only be guaranteed by the Company if he or she complies with the instructions given in this Policy. No protection is granted to the Reporting Person in the event that:

- he or she has committed or participated in the commission of the unlawful conduct that is the subject of the report;
- he or she has made an intentionally false or unfounded report with malice or gross negligence;
- he or she has been convicted, even by a judgment of first instance, of the offences of defamation or slander, or has been convicted by the civil courts of making a false or unfounded report with intent or gross negligence.

In such cases, a disciplinary sanction will be imposed on the Reporting Person.

c. Prohibition of tracking reporting channels

In the event that access to internal reporting channels takes place from the Company's internal data network and is mediated by firewall or proxy devices, the non-traceability - both on the IT platform and on any network equipment involved in the transmission or monitoring of communications - of the Reporting Person at the time when the connection to such channels is established must be guaranteed.

10. MEASURES FOR THE PROTECTION OF THE REPORTED PERSON

Appropriate protective measures are also provided for the benefit of the Reported Person, in order to prevent any discrimination.

The submission and receipt of a report is not sufficient to initiate any disciplinary proceedings against the Reported Person.

Should the decision be taken to proceed with the investigation, the Reported Person may be contacted and given the opportunity to provide any necessary clarification.

11. THE WAY THE REPORT IS HANDLED

a. Receipt of Reports and preliminary ascertainment of the violations

The Whistleblowing Committee has exclusive access to the channels dedicated to receiving whistleblowing reports, which are managed securely and in such a way as to ensure the confidentiality of the identity of the Reporting Person and the protection of any third parties named in the report, and to prevent access by unauthorised personnel. The Whistleblowing Committee ensures a complete and confidential record in accordance with the relevant legislation.

In order to guarantee and protect the confidentiality of the Reporting Person:

- the computerised file will be kept at the dedicated IT platform, while any paper files will be kept at the Company's Human Resources offices;
- the only person with access to the register will be the Whistleblowing Committee, in addition to the Supervisory Body for L231 reports.

Firstly, the Whistleblowing Committee issues the reporting person with an acknowledgement of receipt of the report within 7 days from the date of receipt.

All reports received are subject to preliminary verification by the Whistleblowing Committee in order to verify that the Report falls within the subjective and objective scope of the reporting.

Following this analysis, the Whistleblowing Committee shall decide whether to carry out further investigations with formal initiation of the inquiry, requesting additional information from the Reporting Person, if necessary, or to close and file the report.

Specifically:

- if the Report meets the subjective and objective requirements set out in this Policy, the Whistleblowing Committee shall proceed in accordance with subparagraph b of this paragraph;
- in the event that the Whistleblowing Committee has received a report that it considers concerns unlawful conduct relevant under (It.) Legislative Decree 231/2001 or violations of the Model 231, after issuing the Reporting Person with the acknowledgement of receipt of the Report, forwards the Report to the Supervisory Body for processing in accordance with the provisions of this Policy;
- in the event that the reports concern violations which do not fall within the subjective and/or objective scope of this Policy or are of such general content that they do not allow any verification of the matter, the Whistleblowing Committee shall file the report as provided for in letter c of this paragraph.

b. Investigation and communication of outcome

The purpose of the investigation stage is to verify the validity of the report received.

The Whistleblowing Committee carries out any activity it deems appropriate, including hearing the Reporting Person and any other person who may report circumstances useful for the purposes of ascertaining the facts reported, also in order to assess any remedial action.

The Whistleblowing Committee may also avail itself of the support and cooperation of external consultants, appointed for this purpose, and of corporate departments when, due to the nature and complexity of the checks, their involvement is necessary.

Individuals involved in investigative activities shall forward the results of their investigations to the Whistleblowing Committee to proceed in accordance with this Policy.

It is everyone's duty to cooperate with the Whistleblowing Committee and any other parties involved by the Company during the investigation.

The Whistleblowing Committee forwards the report and the documentation relating to the investigative activities carried out so far to the Supervisory Body if, following in-depth investigations, it considers that the report concerns unlawful conduct relevant under (It.) Legislative Decree no. 231/2001 or violations of Model 231.

If, during the course of the investigation, objective elements emerge proving a “*lack of good faith*” on the part of the Reporting Person, the Whistleblowing Committee shall immediately notify the competent body in order to assess the activation of any sanctioning procedures.

The Whistleblowing Committee is not responsible for any assessment of individual liability and any subsequent measures or proceedings. If it emerges that the report concerns the Whistleblowing Committee, it must be addressed to the Board of Directors by registered letter via the Company address indicated above.

At the end of the preliminary investigation, having ascertained that the report is well-founded, the Whistleblowing Committee draws up a report summarising the checks carried out and the evidence which emerged, with a view to sharing with the competent Body the initiation of sanctioning proceedings or the identification of any corrective action.







The Whistleblowing Committee maintains contact with the reporting person and provides written feedback thereto within **three months** of receipt of the report, informing the reporting person of the action taken or intended to be taken. At the end of the **three-month** period, the Whistleblowing Committee must provide feedback to the Reporting Person, informing him or her:

- of the outcome of the report (e.g. whether the report has been dismissed or whether it has been ascertained to be well-founded and subsequently forwarded to the competent disciplinary bodies);
- of the preliminary activity carried out so far and/or the activity it intends to carry out. The Whistleblowing Committee will also inform the Reporting Person of the subsequent outcome of the report.

c. Archiving

The decision to archive the report is formalised in **dedicated minutes** containing the reasons for the archiving. The minutes are shared with the Administrative Body.

The report is archived if:

	it relates to violations that do not fall within the objective and/or subjective scope of this Policy;
	it lacks the minimum content required by this Policy;
	it refers to facts of such general content that they cannot be verified;
	only documentation was produced, without any description of possible violations;
	it was made in bad faith;
	the preliminary investigation proved the lack of grounds.

d. Reports sent to a non-competent person

Where the internal report is made to a person other than the Whistleblowing Committee, and where the Reporting Person has expressly stated that he or she wishes to benefit from the whistleblowing protections or where such a wish can be inferred from the report, the report is considered a “Whistleblowing report” and must be forwarded by the receiving party, within seven days of its receipt, to the Whistleblowing Committee, with contemporaneous notification of the transmission to the reporting person. Otherwise, if the reporting person does not expressly state that he or she wishes to benefit from the protections in his or her favour, or if this wish cannot be deduced from the report, the report shall be regarded as an ordinary report.

e. Timeframes of the Report handling process

An acknowledgement of receipt of the report to the Reporting Person must be sent	within 7 days of receipt of the report
Feedback on the Report must be provided	within 3 months from the date of the acknowledgement of receipt

	in the absence of an acknowledgement of receipt, within 3 months of the expiry of the 7-day period following the submission of the Report
A reply to the request for a face-to-face meeting must be sent	no later than 7 days after the request for a face-to-face meeting was received
The day of the face-to-face meeting must be arranged	within 10 days of receipt of the request for a face-to-face meeting in cases of proven urgency, within 5 days of receipt of the request for a face-to-face meeting
The report must be sent from the non-competent subject to the competent subject	within 7 days of receipt of the report, with simultaneous notice to the reporting person (by the non-competent person)

- **Retention**

How long can documents relating to the report be retained?

The Whistleblowing Committee is required to document the entire whistleblowing handling process, by means of computerised and/or paper media, and to keep all the relevant documentation, in order to ensure complete traceability of the actions taken to perform its functions.

All documentation must be retained for as long as necessary for the handling of the report and, in any case, no longer than 5 years from the closing of the reporting procedure, after which time the report and the relevant documentation must be deleted.

Where should the documents relating to the report be kept?

Documents in electronic format must be stored in a repository within the whistleblowing platform protected by authentication credentials, known only to the Whistleblowing Committee or to expressly authorised persons.

Any paper documents are filed in an identified locked location, access to which is permitted only to the Whistleblowing Committee or to expressly authorised persons.

The Supervisory Body is required to document its investigations and to keep the results of its investigative activity in a special computer and/or paper file that is accessible only to the Supervisory Body itself.

How are verbal and face-to-face reports documented?

If a telephone line or other recorded voice messaging system is used, the report, subject to the consent of the reporting person, is documented either by being recorded on a device suitable for storage and listening or by means of a verbatim transcript.

In the case of transcription, the Reporting Person may verify, rectify and confirm the content of the transcription by signing it.

In the event of the use of a telephone line or other non-recorded voice messaging system, the report shall be documented in writing by means of a detailed record of the conversation by the personnel in charge. The Reporting Person may verify, rectify and confirm the contents of the transcript by signing it and has the right to obtain a copy of the report.

If the report is made verbally in the course of a face-to-face meeting, it shall, with the consent of the Reporting Person, be documented either by being recorded on a device suitable for storage and listening or, if recording is not possible, by means of minutes. In the case of minutes, the Reporting Person may verify, correct and confirm the minutes of the meeting by signing them and has the right to obtain a copy of the report.

12. SANCTIONS

Effective, proportionate and dissuasive sanctions may be applied:

- against the Reported Person, if the reports prove to be well-founded;
- against the Reporting Person, if reports are made in bad faith;
- against anyone who has violated the protective measures provided for in this Policy or has obstructed or attempted to obstruct reports.

Disciplinary measures against employees of the Company may be applied depending on the seriousness of the breach itself, in application of the principles of proportionality, as well as of the criteria of correlation between the breach and the sanction and, in any case, in compliance with the legislation in force and the Disciplinary System outlined within the Company's Model 231.

In order to ensure impartiality and avoid conflicts of interest, decisions on any disciplinary measures, complaints or other actions to be taken shall be taken by the competent corporate departments and, in any case, by persons other than the person who conducted the whistleblowing investigation.

13. PROCESSING OF PERSONAL DATA

Any processing of personal data under this Policy must be carried out in accordance with the relevant legislation in force, specifically, Regulation (EU) 2016/679 (“General Data Protection Regulation” or “GDPR”), (It.) Legislative Decree of 30 June 2003, no. 196 (“Privacy Code”) and (It.) Legislative Decree of 18 May 2018, no. 51 as amended, as well as with the recommendations and guidelines issued by the competent national and European authorities.

Personal data that are clearly not useful for the handling of a specific report are not collected or, if accidentally collected, are deleted immediately. The principle of minimisation laid down in the Whistleblowing Decree must be interpreted restrictively, limiting the applicability of the provision to cases where it is clear that parts of the report that contain personal data are absolutely irrelevant to the reported matter, without prejudice to the sectoral rules on the retention of records.

The rights under Articles 15 to 22 of the GDPR may be exercised within the limits of Art. 2-*undecies* of (It.) Legislative Decree of 30 June 2003, no. 196 and Art. 23 of the GDPR.

The processing of personal data relating to the receipt and handling of reports is carried out by the Company in its capacity as Data Controller, in compliance with the principles set out in Articles 5 and 25 of the GDPR, providing appropriate information to the Reporting Person pursuant to Art. 13 and 14 of the GDPR, as well as taking appropriate measures to protect the rights and freedoms of the data subjects. To this end, at the following link www.ictgroup.net/whistleblowing/ictspa, the Company provides the Information on the processing of personal data carried out in connection with the handling of reports governed by this Policy.

Furthermore, the Company, in line with the provisions of Art. 13 of the Whistleblowing Decree, as well as in compliance with Art. 32 of the GDPR, has identified appropriate technical and organisational measures to ensure a level of security appropriate to the specific risks arising from the processing operations performed, on the basis of a data protection impact assessment (so-called “DPIA”), as well as regulating the relationship with any external providers that process personal data on its behalf pursuant to Art. 28 of the GDPR.

14. UPDATE

It is the duty of the Whistleblowing Committee to periodically - at least once a year - review this Whistleblowing Policy and the reporting channels provided for herein, according to the operations and experience gained and to ensure, in any case, their constant alignment with the reference legislation.

15. DISSEMINATION, INFORMATION AND TRAINING

This Policy is disseminated through publication on the institutional website, on the internal reporting channel and by being displayed on company notice boards and/or in other visible and accessible places.

The Company promotes a communication, information and training activity on this Policy to ensure the widest knowledge and most effective application thereof, by illustrating the rules on whistleblowing, the functioning of and access to the channels and tools made available to make reports and the measures applicable in the event of violations.