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1. PURPOSE

The purpose of this procedure is to provide the whistleblower with clear, precise and concise indications on how to make and transmit reports, as well as forms of protection for the same.
 For more details and further details on the process of handling whistleblowing, please refer to ANNEX 1 - Insights and operational aspects of WHISTLEBLOWING.

2. AREA OF APPLICATION

The procedure applies to **whistleblowing reports**, i.e., those reports that fall within the scope provided by Legislative Decree 24/2023 (described below) where the whistleblower wants to keep his or her identity confidential and benefit from the protections provided in case of any retaliation.
 To make an **ordinary report** (i.e., not whistleblowing, i.e., lacking the protections expressly recognized by Legislative Decree 24/2023), contact the corporate management.

The procedure applies to reporting the following **types of wrongdoing**:

- a) Offenses that fall within the scope of relevant European Union or national acts
- b) Offenses related to public procurement, services, products and financial markets, prevention of money laundering, product safety and compliance, transportation safety, environmental protection, food and feed safety, animal health and welfare, public health, consumer protection, protection of life and protection of personal data, and network and information system security
- c) Violations of competition and state aid rules
- d) Violations of regulations on corporate tax.

Procedure does not apply:

- 1. TO ordinary reporting
- 2. to disputes, claims or demands related to an interest of a personal nature
- 3. to unsubstantiated reports based on rumors/hearsay

3. ACTIVITIES DESCRIPTION

3.1. WHO CAN REPORT

Offenses under (a) of the preceding paragraph may be reported by anyone who becomes aware of them.

The other offenses referred to in the preceding paragraph, information about which has been gathered within one's work environment, can be reported by:

- employed workers
- self-employed workers
- freelancers and consultants
- volunteers and interns, paid and unpaid
- shareholders (natural persons)
- persons with functions of administration, management, control, supervision or representation, including when such functions are exercised on a de facto basis only.

3.2. REPORTING MODE

The report should be sent to the Reporting Manager (hereafter GeSe for short) using these channels:

- web www.segnalazioneviolazioni.it
- oral form through the telephone or face-to-face meeting with GeSe (by appointment, to be arranged with 7 days' notice). For this purpose, the following mobile phone number has been activated, managed by the GeSe, which can be called or messaged through the WhatsApp application that guarantees end-to-end encryption: 340 4955769
- ordinary mail with the words "confidential" to the following address: ROBANS S.r.l. Via Torino, 9/b, 56038 Ponsacco (PI) - c.a. Reporting Manager or to GeSe or whistleblowing c.a.

In the event that the reporter has knowledge, or assumes that there is a conflict of interest, of the GeSe ¹

- ordinary mail with the words "confidential" to the following address: ROBANS S.r.l. Via Torino, 9/b, 56038 Ponsacco (PI) - c.a. Board of Directors whistleblowing or to the c.a. Whistleblowing Department

From examination of the report, they must necessarily be clear:

- the circumstances of time and place in which the reported fact occurred;
- the description of the fact;
- the generalities or other elements that make it possible to identify the person to whom the reported facts are attributed.

The company guarantees the confidentiality of whistleblowers and that they are protected from any form of retaliation.

The company shall not take any disciplinary or discriminatory action against anyone who has made a report in good faith, even if the facts reported are not proven. These protection measures are also guaranteed to those who have assisted the whistleblower in the reporting process.

The company will not tolerate reports made in bad faith and/or with slanderous/defamatory intent that turn out to be unfounded. In such cases, the behavior is considered malicious.

Reports from which the identity of the reporter cannot be determined are considered anonymous.

Anonymous reports, where substantiated, are equated by GeSe with ordinary reports and sent to management for appropriate handling.

¹ GeSe has a conflict of interest when it coincides with the reporter, the reported person, or is otherwise a person involved in or affected by the report.

3.3. *GESE IDENTIFICATION*

Il Gestore della Segnalazione è stato individuato nella persona di Enio Marraccini² (consulente esterno reperibile ai contatti sopra riportati).

3.4. *REPORT SENT TO NON-COMPETENT ENTITY*

If the report is made to a person other than the GeSe, with an express declaration of willingness to benefit from whistleblowing protections, the report is considered a "whistleblowing report" and must be transmitted, within seven days of its receipt, to the GeSe, with simultaneous notice of the transmission to the reporter.

If the whistleblower does not state that he or she wishes to benefit from the protections, or said willingness cannot be inferred from the report or from conclusive behavior, the report is considered an ordinary report.

3.5. *HOW REPORTS ARE HANDLED*

When the GeSe receives a report:

- within 7 days, sends the reporter an acknowledgement of receipt of the report;
- maintains interlocations with the reporter from whom he/she may request additions;
- conducts investigations in such a way as to ensure that the information collected, including the identity of the reporter, persons involved, and persons assisting the reporter in the reporting process, is treated with the utmost confidentiality and security;
- provides acknowledgement of the report within 3 months from the date of the notice of receipt of the first report.

Where the report has been made through a web platform, the reporter, in confidential mode, may:

- send anonymous or confidential reports
- exchange messages with the GeSe
- monitor the progress of reporting
- give consent to the disclosure of one's identity
- receive the concluding feedback of their report

Activities following the initial submission of the report are possible through periodic access by the reporter to the platform using the unique identification code issued upon submission of the report..

In the case of an oral or mailed report, the reporter will be notified about the status of the investigation (intake, filing, and disposition of actions) only if the report contains a valid contact address.

All information collected is stored by GeSe in accordance with data protection principles.

3.6. *EXTERNAL REPORTING AND PUBLIC DISCLOSURE*

In addition to internal reporting (described in the previous paragraphs), the whistleblower can make an external report to ANAC (National Anti-Corruption Authority) via <https://www.anticorruzione.it/-/whistleblowing> if he or she:

- already made an internal report and it has not been acted upon
- reasonable grounds to believe that, if it made an internal report, the report would not be effectively followed up or that the same report might result in the risk of reprisal
- well-founded reason to believe that the violation may constitute an imminent or obvious danger to the public interest.

The reporter may also decide to put the information about the report into the public domain if the following conditions are met:

- an internal report that was not responded to by the company within the prescribed timeframe was followed by an external report to ANAC, which, in turn, did not provide feedback to the reporter within reasonable timeframes

² If the report reveals reasons that would even suggest that a person may be involved in the facts narrated, GeSe will avoid identifying him or her as an auxiliary.

- the reporter has already directly made an external report to ANAC, which, however, has not given feedback to the reporter regarding the measures planned or taken to follow up on the report within a reasonable
- the reporter has good reason, to reasonably believe, based on concrete circumstances and thus, not on mere inferences, that the violation may pose an imminent or obvious danger to the public interest
- the reporter has reasonable grounds to believe that the external report may pose a risk of retaliation or may not be effectively followed up.

3.7. PROTECTION FROM RETALIATION

Alleged retaliation, even if only attempted or threatened, must be reported exclusively to ANAC through the IT platform referred to in the previous paragraph.

Any finding by ANAC of retaliation, determines:

- the nullity of the retaliatory measure and administrative penalty to the person who took the retaliatory measure/act or to whom the conduct and/or omission is attributable
- in case of dismissal, the nullity of the dismissal and right to reinstatement in the workplace.

3.8. DISCLAIMERS AND AGREEMENTS

The whistleblower, and other protected parties, may waive their rights and remedies or have them settled, only if this is done in the protected venues.

3.9. ADVERTISING

This procedure, as well as its annex, must have maximum publicity in order to make effective the efforts made by the company to comply with the dictate of Legislative Decree 24/2023.

For this reason, the aforementioned documents, are published in a special section of the company website.

Notice is also given to all employees, through a summary document, that the company has implemented a whistleblowing system that complies with Legislative Decree 24/2023.

For any information on the rights and duties of protected persons that is not included within this procedure or its annex, please refer to the ANAC Guidelines and Legislative Decree 24/2023 (freely available from the ANAC website and the Normativa portal) to which the company complies.

4. SUMMARY OF RECALLED DOCUMENTS

ANNEX 1 - Insights and operational aspects of WHISTLEBLOWING