

## **"WHISTLEBLOWING" REPORTING CHANNELS**

With continuous attention to operate according to the highest quality standards, F.lli Vergnano s.r.l., from now on **Vergnano** (logo), considered it appropriate to adopt a system for reporting any violations and illicit conduct, *whistleblowing*, acc. D. Lgs. 24/2023, in order to promote a common legality and an attitude of integrity and transparency.

The adopted regulation is intended to protect people who report illicit conduct of which they have become aware during their working activity and related to it (administrative, criminal, accounting, civil, etc.)

**Vergnano** has decided to equip itself with an IT platform in order to facilitate the reporting person, to allow the protection of confidentiality and an accurate verification of any communications received.

### **Who can report?**

- . All **Vergnano** employees;
- . self-employed workers and co-workers, suppliers, freelancers and consultants who work with the Company;
- . volunteers and interns (paid and unpaid);
- . shareholders and people with administrative, managerial, control and supervisory or representation functions;
- . candidates;
- . employees on work trial;
- . former workers

The procedure adopted has the aim to verify the validity of the report through the protection of the whistleblower's privacy, the protection of the whistleblower from any retaliation such as discrimination or penalization in the workplace, directly or indirectly, or to possible third parties involved too, as well as protection of the organisation's reputation.

### **What can be reported?**

The *whistleblowing* procedure was designed to allow the emergence of violations, appeared in active or omissive behavior, which materialize a damage to the protected public interest or the integrity of the Company and of which the whistleblower has become aware during the working relationship.

It must be noted that this channel is not intended to report concerning commercial issues, disputes between employees or complaints, therefore, this kind of reports cannot be managed here.

### ***How can you make a report?***

**Vergnano** has set up two different **internal channels**:

A) In written form, through the IT platform

By accessing the whistleblowing service platform through the company website it will be possible to proceed with completing a report, either anonymously or by entering own data after examining and accepting the information related to the data processing.

B) By requesting an oral meeting, through the platform

If the reporter prefers to proceed with an oral meeting, it can be required directly to the designated internal whistleblowing manager.

The handling of reports related to the *whistleblowing* should be managed giving priority through the internal channel, however there is also an external channel that allows the communication of the report directly to the Anti-Corruption Authority (ANAC).

This option is feasible if:

- the internal channel is not foreseen in your working context, or it has not been provided yet or, if activated, it does not comply with the regulations;
- the reporting person has already reported internally, but has not received any result;
- the whistleblower has reason to believe that, in the event of reporting, he would risk retaliation;
- the reporting person fears that the subject of the report may cause an imminent or manifest danger to the public interest

Only under specific legal conditions it is possible to proceed with public disclosure.