

## REPORT FORM

It is recommended to attach all the documentation that you believe may be useful to corroborate the Report; if the Report is made verbally, this documentation can be delivered in analogue form. Where what has been reported is not adequately detailed, the Whistleblowing Committee may request any additions to the person making the report

- ☐ I expressly declare that I wish to benefit from the protections regarding Whistleblowing and, consequently, I ask that this report, if received by a non-competent person (i) be transmitted, within seven days of its receipt, to the competent person; (ii) that I am given simultaneous notification of transmission

### 1. Data of the reporting person

Name and Surname (non-mandatory data)

---

Membership structure and qualification (non-mandatory data)

---

Selected contact channels (e.g. private email address, telephone number, etc.)

---

Does the Reporting Person have a private interest related to the Report? ☐ Yes ☐ No

Specify the nature of the private interest linked to the Report

Is the Reporting Person jointly responsible for the violations he reports? ☐ Yes ☐ No

### 2. Reported offense

Circumstances of time and place in which the event, which is the subject of the Report, occurred

---

Area of company operations to which the event can be referred

---

Subjects involved

Internal	External
----------	----------

Description of the event being reported (possible to attach documentation)

Other subjects who can report on the facts covered by the Report

Internal	External
----------	----------

Other subjects to whom the Report of the fact was forwarded? ☐ Yes ☐ No

Specify which subjects and when

Date and Place

Signature

\_\_\_\_\_

\_\_\_\_\_  
(Not mandatory data)

## PRIVACY INFORMATION REPORTING PERSON

pursuant to art. 13 of Regulation (EU) 2016/679 relating to the processing of personal data in the context of reporting violations referred to in Legislative Decree 24/2023

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter "GDPR") and the applicable legislation on the protection of personal data, we inform you that the personal data provided as a Reporting Person ( hereinafter also "Interested Party") through this "Report Form" or otherwise provided in the event of internal reporting of a violation pursuant to Legislative Decree 24/2023, will be processed in compliance with the legislation referred to above and in accordance with the principles of correctness, lawfulness and transparency by personnel authorized by Scame S.p.A. pursuant to article 29 of the GDPR and article 2-quaterdecies of the code regarding the protection of personal data (Legislative Decree 196/2003)

### 1. Data Controller and Data Protection Officer

The data controller of personal data is Scame Parre S.p.A. (hereinafter also "Company" or "Owner") with registered office in Via Costa Erta no. 15, Parre (BG), 24020, contactable at the email address [privacy@scame.com](mailto:privacy@scame.com).

### 2. Purpose of processing and legal basis

Personal data are processed for the management of internal reports of alleged violations, or behaviors, acts or omissions that harm the public interest or the integrity of the public administration or private entity, defined by the art. 2 paragraph 1 letter a) of Legislative Decree 24/2023, of which the reporting Person has become aware due to his/her collaboration relationship with the Data Controller. The personal data processed are those contained in the internal report, and/or in deeds and documents attached to it, which refer to the reporting Person and any other subject involved.

Personal data may also be processed to carry out the necessary investigative activities aimed at verifying the validity of what has been reported, as well as, if necessary, for the adoption of adequate corrective measures and the introduction of appropriate disciplinary and/or judicial actions in against those responsible for the violations. The legal basis that legitimizes the processing of personal data is represented by the fulfillment of a legal obligation to which the Data Controller is subject (Art. 6 paragraph 1, letter c) of the GDPR), and specifically, provided for by the Legislative Decree 24/2023. The processing may also potentially concern particular data and data relating to criminal convictions and crimes if included in the report in accordance with the provisions of articles 9 and 10 of the GDPR.

The identity of the worker may also be communicated to other subjects.

### 3. Categories of data recipients

The personal data provided will be processed by the members of the Whistleblowing Committee and by competent subjects as authorized to process by the Data Controller, in order to follow up and respond to the reports received, in compliance with the provisions of Legislative Decree 24/2023, and activate any disciplinary system envisaged, as well as undertake corrective actions aimed at avoiding situations similar to those covered by the Report.

In the event that the Company entrusts the task of managing the reporting channel to a third party, the aforementioned personal data will be taken from this subject in the capacity of Data Processor designated by the Data Controller pursuant to art. 28 of the GDPR. Such data will be processed exclusively through expressly authorized personnel and in compliance with the provisions of Legislative Decree 24/2023.

Personal data will not be disclosed but may be transmitted to the Judicial Authority. None of the data collected will be transferred to Third Countries, meaning countries not belonging to the European Economic Area (EEA). If the report is external and is presented, as required by the articles 6 and 7 of the Legislative Decree 24/2023, to the National Anti-Corruption Authority (ANAC), information relating to the processing of personal data will be provided by the Authority itself through the appropriate channels.

### 4. Criteri Storage time criteria

Internal reports and the related documentation will be kept for the time necessary to process the report and in any case no later than five years from the date of communication of the outcome of the reporting procedure,

in compliance with the confidentiality obligations referred to in Article 12 of this Legislative Decree 24/2023 and the principle referred to in articles 5, paragraph 1, letter e), of the GDPR and 3, paragraph 1, letter e), of Legislative Decree 51 of 2018. After the maximum period of five years the information reported to the report may be retained by the Company in order to guarantee and preserve its right of defense and to provide proof, where required, of the correct management of the reports received. In this case, the personal data of the Reporting Person will be anonymised.

## 5. Data processing methods

The processing of personal data will be carried out exclusively by expressly authorized personnel, in such a way as to guarantee the confidentiality of the identity of the reporting Person and of the content of the internal reports and the related documentation, adopting adequate technical and organizational measures to protect them from unauthorized access or illicit, from destruction, from loss of integrity and confidentiality, even accidental. In order to guarantee the confidentiality of the Reporting Person for the entire duration of the management of the internal report, the identity of the same will be known by the subjects expressly authorized to manage the reports. With the exception of cases in which a liability for slander and defamation is configurable pursuant to the provisions of the criminal code or the art. 2043 civil code or, where applicable, in the context of criminal proceedings and in the ways and limits of the provisions of the art. 329 c.c.p., the identity of the reporting person is protected in every context following the reporting. Therefore, without prejudice to the aforementioned exceptions, the identity of the Reporting Person cannot be revealed without his express consent, and all those who receive or are involved in the management of the report are required to protect the confidentiality of such information.

## 6. Provision of data

The provision of personal data is optional. Failure to provide information could, however, jeopardize the investigation of the report: anonymous reports, in fact, will be taken into consideration only if they are adequately substantiated and provided in detail, to bring out facts and situations connected to specific contexts.

## 7. Rights of interested parties

The rights referred to in articles 15-22 of the GDPR can be exercised, within the limits of the provisions of the art. 2-undecies, paragraph 3, of Legislative Decree 196/2003 ss.mm.ii., by contacting the Data Controller or the DPO via the contacts indicated above. In particular, the rights identified above cannot be exercised with a request to the Data Controller or the DPO, or with a complaint pursuant to Article 77 of the GDPR to the Guarantor Authority, if the exercise of these rights could result in actual and concrete prejudice to the confidentiality of the identity of the person who reports violations of which he or she becomes aware due to his or her employment relationship or the functions performed. The exercise of the aforementioned rights may, in any case, be delayed, limited or excluded with motivated communication made without delay by the Owner, unless the communication could compromise the purpose of the limitation, for the time and within the limits in which this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the reporting Person, the Person involved or the persons involved in various capacities in the reports. In such cases, pursuant to art. 2-undecies, paragraph 3, of the Legislative Decree 196/2003 the interested party has the right to exercise the aforementioned rights through the Guarantor Authority in the manner set out in the art. 160 of the aforementioned legislative decree. In cases where it is believed that the processing of personal data occurs in violation of the provisions of the GDPR, it is possible to lodge a complaint with the Guarantor Authority, as provided for by the art. 77 of the GDPR itself (with the exclusion of the limitations on the exercise of the rights reported above and provided for by art. 2-undecies, paragraph 3, of Legislative Decree 196/2003 ss.mm.ii.), or to take appropriate action judicial offices (art. 79 of the GDPR).

Date and Place

Signature

---

---