

WHISTLEBLOWING GUIDELINES

In compliance with the provisions of the law and with a view to guaranteeing correctness and transparency in the conduct of its business, Scame Parre S.p.A. has set up a "Whistleblowing" IT system, available to anyone who wishes to report situations relevant to the law or internal regulations.

The Legislative Decree 24 of 10 March 2023 transposes EU Directive 2019/1937 of the European Parliament and of the Council regarding the protection of persons ("Whistleblowers") who report violations of Union law.

What is Whistleblowing? It is a corporate compliance tool, through which employees or third parties of a company can report, in a confidential and protected manner, any offenses encountered during their activities. The new Decree aims to improve the principles of transparency and responsibility for private organisations.

With this handbook, we report the path to follow to make the report.

CHARACTERISTICS OF THE REPORTING

The report must refer to legislative or regulatory failures, including the Code of Ethics and internal procedures, or laws and regulations; therefore, reports regarding complaints, personal requests or, more generally, circumstances not relevant to the above purposes may not be taken into consideration. The reports must be made in good faith, detailed and based on precise and consistent factual elements in order not to lose the effectiveness of the tool made available to you. Anyone who intentionally or grossly negligently makes reports, which subsequently prove to be unfounded, may be subject to disciplinary sanctions.

ACCESS MODE

1. Once you have registered via the company page <https://areariservata.mygovernance.it/#!/WB/Scame-Parre> (use, as indicated by the Privacy Guarantor, a personal and non-company email) and received the email containing the Unique Credentials, access the link <https://areariservata.mygovernance.it/> with your credentials:

MY GOVERNANCE
WE DIGITIZE YOUR COMPANY
ZUCCHETTI

Insert your email address

Password

Password dimenticata? Forgot password?
Clicca per resettare / Click here to reset

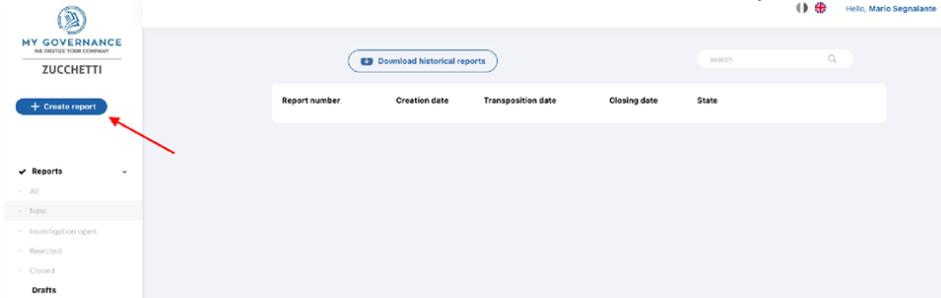
Non sono un robot

hCAPTCHA
Privacy - Terms

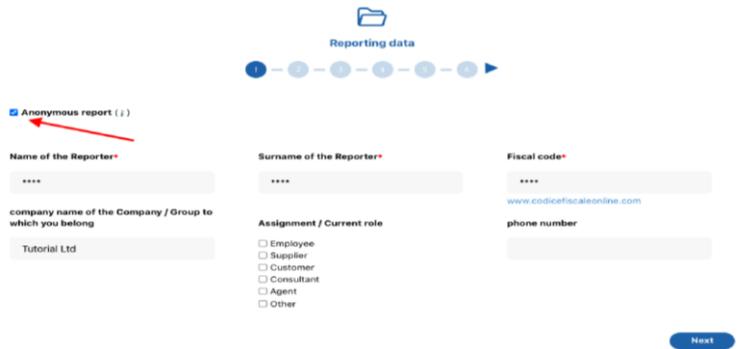
Login

Assistenza Dedicata/Customer Care
Area Riservata My Governance/Reserved Area My Governance
www.mygovernance.it/assistenza
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2. From the side menu on the left, select “CREATE REPORT” option.



3. At this point, it is possible to proceed with the report
a. anonymously using the appropriate option:



b. or, in a non-anonymous form, but in any case with the guarantees of confidentiality provided by law:



4. Once the reporting method has been established, the reporter proceeds by filling out the form. The fields marked with the * symbol are mandatory. Some fields are open and must have a minimum number of characters.

5. The first question asks if the report has already been made to others (e.g. your direct manager in the case of an employee, top management in a company, or third parties such as a public authority, etc.). If not, the reason is still requested but is not mandatory.

Reporting to other subjects

◀ 1 - 2 - 3 - 4 - 5 - 6 ▶

Has the report already been communicated to other subjects?*

YES NO

For what reasons the report was not addressed to other subjects?

6. This is then followed by further requests for information necessary to substantiate the report, including the description of the facts in the appropriate box.

 **Data and information Report Illegal conduct**

◀ 1 - 2 - 3 - 4 - 5 - 6 ▶

Company / Organization in which the event occurred*	Place of the event*
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Subject who committed the event*	Date of the event*
Name	<input type="radio"/> Period <input type="radio"/> Single event
<input style="width: 95%;" type="text"/>	
Surname	
<input style="width: 95%;" type="text"/>	
Role	
<input style="width: 95%;" type="text"/>	
Which department the violation refers to?*	
<input type="checkbox"/> Administration <input type="checkbox"/> Audit <input type="checkbox"/> Commercial <input type="checkbox"/> Compliance <input type="checkbox"/> Management control <input type="checkbox"/> General Directorate <input type="checkbox"/> Finance <input type="checkbox"/> Internal Control <input type="checkbox"/> Legal <input type="checkbox"/> IT <input type="checkbox"/> Marketing <input type="checkbox"/> Production <input type="checkbox"/> Risk management <input type="checkbox"/> Human resources <input type="checkbox"/> Company Secretariat <input type="checkbox"/> Other	
<input type="button" value="Previous"/>	<input type="button" value="Next"/>

You must enter a description of the facts by entering at least 50 characters.

 **Description of the event**

◀ 1 - 2 - 3 - 4 - 5 - 6 ▶

Description of the event*

the description must be at least 50 characters and maximum 4000

7. Therefore, the type of violation must be reported, where known.

The screenshot shows a progress bar with six steps, where step 5 is selected. Below the progress bar, the title 'Type of committed violation' is displayed. Underneath, there is a list of checkboxes for the type of violation:

- Organizational Model pursuant to Leg. Decree 231/2001
- Laws and / or regulations
- Business Procedures
- Business Regulations
- Other

8. The reporter can attach documents to support his report:

The screenshot shows a progress bar with six steps, where step 6 is selected. Below the progress bar, the title 'Documentation' is displayed. The text 'Please attach documents to substantiate your report, if any' is shown. Below this, the allowed file types are listed: .pdf / .jpg / .png / .doc / .docx / .xls / .xlsx / .ppt / .zip / .mp3 / .mp4. A large dashed box contains the text 'Drop file or click to upload Max 50Mb'.

9. Once the report summary screen has been reviewed, the reporter can send it.

The screenshot shows the 'Summary' step of the report form. At the top, there is a document icon and the title 'Summary'. Below the title, the text reads: 'Before sending the signal we pray you to recontroll and confirm information inserts'. There are three tabs: 'DETAIL', 'Uploaded Documents', and 'CONSENT'. Below the tabs, there are two checkboxes for declarations:

- I declare that all the information I have provided is true, to the best of my knowledge, aware of the responsibilities and the civil and penal consequences foreseen in case of false declarations and,
- I declare that I have read the Company's privacy policy [Privacy Notice](#)

HOW TO MAKE A VOCAL REPORT

From the menu on the left, select “VOCAL REPORT”.

The screenshot shows the 'MY GOVERNANCE' interface for 'ZUCCHETTI'. On the left is a navigation menu with options like 'Create report', 'Vocal report', and 'Reports'. The main area is titled 'Reporting data' and contains a progress indicator with five steps. The form includes the following fields and options:

- Anonymous report ()
- Name of the Reporter: [text input]
- Surname of the Reporter: [text input]
- Fiscal code: [text input]
- company name of the Company / Group to which you belong: [text input, value: Scame Parre S.p.A.]
- Assignment / Current role: [checkbox list with options: Project contributor, Third part employee, Employee, Supplier, Customer, Consultant, Agent, Other]
- phone number: [text input]
- www.codicefiscaleonline.com
- Next button

Below are the steps to follow to make the vocal report:

The screenshot shows the 'Vocal report' recording interface. It includes the following elements:

- Section title: **Vocal report**
- Text: Dear reporting person, it is important that the report contains useful elements to allow the manager to carry out checks, investigations and evaluate the validity of the facts reported. In summary, the report must contain at least: the data of the person reported; the place and period, also indicative, in which the event occurred and the clear description of the event. Furthermore, the report must contain any other known information that can confirm the validity of the facts reported.
- Checkbox: I authorize the Data Controller indicated in the Privacy Policy to access the microphone for the voice recording of my report
- RECORD button
- RECORDING timer: 00:02
- Text: Maximum duration allowed: 5 minutes
- UNDO and STOP buttons

The system allows the reporter to listen to his report before sending it.

The screenshot shows the 'Listen again to your report before sending it' interface. It includes the following elements:

- Section title: **Listen again to your report before sending it**
- Progress bar: 0:00 / 0:19
- Text: Dear reporter, in order to preserve your privacy, we confirm that your voice report will be transmitted following a voice morphing process which will alter your real voice timbre
- Checkbox: I declare that I have read the Company's privacy policy
- Checkbox: I authorize the Data Controller to transcribe my personal data contained in the oral report I made
- UNDO and SEND REPORT buttons

Once the report has been sent, the reporter receives an e-mail when it is taken care of by the report manager.

In addition to the information provided, we invite you to read the internal Whistleblowing procedure published on the website.

Best regards.