

1. Who can submit a Report?

Any individual (internal and external) can submit a report.

2. What are the situations (and the Parties) that can be reported?

The report may refer to any illegal conduct or irregularity; violation of rules; action likely to cause damage to assets or corporate image; violation of the Code of Ethics and the Code of Conduct; violation of the Anti-Bribery Policy; violation of the 231 Model; violation of company procedures and regulations.

Parties that may be reported are all employees, including managers, permanent and non-permanent, collaborators, members of the Supervisory Bodies and Boards of Directors, third parties who may cause damage or prejudice to the activities.

3. Do I have to disclose my identity to submit a report?

No. Although anonymous reports are accepted, Whistleblowers are suggested to use non-anonymous reports, to allow timely and effective investigations (for instance, in the verification phase it is possible to speak with the Whistleblower in order to collect more information). The protection of the Whistleblower is always guaranteed, in terms of confidentiality of their identity and from any retaliation or discrimination (see also FAQ no. 5 and no. 6).

4. What are the elements mandatory in a report?

To allow for the useful assessment of facts, the Whistleblower must report the facts in good faith, providing all information available, such as, by way of example, the description of the facts being reported, with an indication of the known circumstances (method, time and place); identification information of the Reported party (or Reported parties) as far as known; indication of any other persons who may report on the facts being reported; indication or - if available – provision of any documents supporting the report as well as the identification information of the Whistleblower (e.g., general information and contact details), in cases of non-anonymous reports.

5. What confidentiality safeguards are guaranteed to the Whistleblower and to the Reported party?

The confidentiality of the Whistleblower's identity is guaranteed regardless of the communication channel chosen for submitting the report, starting from the reception, without prejudice to compliance with the law. Specifically, for reports submitted via the IT platform, the confidentiality of the Whistleblower identity is guaranteed by a technical function that anonymizes their name and by a no-log policy that does not allow any direct or indirect disclosure of information on the connection methods (for example server, IP address, mac address) even if via a PC connected to a company network.

All the people of the Group who receive a Report, and/or who are in any case informed of it in any capacity, are required to guarantee the confidentiality of the existence and content of the Report, as well as the identity of the Whistleblower and Reporting parties. Any communication relating to the existence and content of the Report, as well as the identity of the Whistleblower and Reporting Party, must strictly comply with the "need to know" criterion.

6. Are there any safeguards for the Whistleblower from retaliation or discrimination?

The law guarantees the protection of anyone reporting in good faith from retaliation or any discriminatory measure connected, directly or indirectly, to the report. The Ethics Officer- Whistleblowing Team of the ASPI Group (through the competent corporate functions) will monitor the employee's working life for 2 years from the date of the Report in order to prove the absence of discriminatory actions or other forms of retaliation as a result of the report.

7. What safeguards are guaranteed to the Reported party?

The guarantees of confidentiality provided by the Policy also protect the Reported party. The Reported Party will not be subject to disciplinary sanctions when lacking objective evidence regarding the reported violation, and in particular without investigating the facts being reported.

8. Who is in charge of examining the reports and supervising their in-depth analysis?

The Ethics Officer-Whistleblowing Team of the ASPI Group carries out the verification activities directly through the Internal Audit (whose Director is also the Coordinator of the Ethics Officer-Whistleblowing Team of the ASPI Group) which, if necessary, may resort to the support of the Competent Departments to carry out the assessment deemed necessary for each specific case, inviting them to provide feedback on the result of the audit.