

“Whistleblowing”

PROCEDURE FOR REPORTING MISCONDUCT

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1. Introduction and purpose

Specialinsert srl. intends to strengthen within its organization the Governance system, including the part directed at preventing actions or omissions that:

- are not according with Specialinsert srl.'s values and Code of Ethics, company policy and, in general,
- With the compliance procedures adopted by the organization; and/or
- Are not in compliance with applicable laws; and/or
- may significantly harm the interests of Specialinsert Ltd. (collectively, the **“Violations”**);

thereby ensuring a work environment in which everyone can responsibly report any Violations. Functional to this effort is the adoption of this procedure that governs the reporting by - among others - members of the organization of Violations that bear the above characteristics **(the “Procedure,” or also the “Whistleblowing Policy”)**.

For the purposes of this procedure, Specialinsert srl means all Italian locations.

This Procedure defines the so-called communication channels for the receipt, analysis and processing of reports of possible Violations.

Whistleblowers identity must always be kept confidential, and whistleblowers must not incur any liability, whether civil, criminal, administrative or labor, for reporting a Breach in good faith through so-called communication channels.

Specialinsert srl. hopes that everyone will cooperate to maintain a climate of mutual respect for each other's dignity, honor and reputation in the company.

It should be recalled that Specialinsert srl prohibits retaliation, direct or indirect, against anyone who reports potential Violations, providing for sanctions of an appropriate nature in this regard.

At the same time, Specialinsert srl intends to react promptly against those who, with malice or gross negligence, report Violations that turn out not to exist.

This Procedure complies with the regulations set forth in Legislative Decree 24/2023, which implemented in Italy EU Directive 2019/1937, concerning the protection of persons who report violations of Union law and laying down provisions regarding the protection of persons who report violations of national regulatory provisions.

2. Recipients

Recipients of this Procedure are the "whistleblowers" i.e., all current or former associates, collaborators and/or employees of Specialinsert srl, including candidates and stagers and, in general, all those who, although not belonging to Specialinsert srl, work or have worked directly or indirectly with Specialinsert srl (e.g., suppliers of goods and services, Customers) (jointly, the "**Recipients**" or also the "**Whistleblowers**"). The protections provided in this Procedure also apply to Other Protected Persons, as defined below.

According to the above, this Procedure is brought to the attention of all Recipients through appropriate means of communication, including e-mail, by Whistleblowing Support (as defined below).

In particular, this Procedure will be made accessible through the company intranet, and will also be available to those who, while not frequenting the offices of Specialinsert sr, have a legal relationship with Specialinsert srl in one of the forms mentioned above. The same will also be explained in a dedicated section of the Specialinsert sr website, where reporting channels will also be available.

In order for protection under this Procedure to be guaranteed, a report - internal or external of information - must be made in writing and/or in any format prescribed under this Procedure ("Protected Report").

A report is a Protected Report if the whistleblower:

- Had reasonable grounds to believe that the information about the Violations was true at the time of the report; and
- made the report internally (pursuant to Section III of this Procedure) or externally (pursuant to Section V of this Procedure).

The protections conferred by this Procedure and under relevant regulations do not apply to a whistleblower who knowingly discloses information that he or she knows or reasonably should know to be false.

In the event that a whistleblower has made a Protected Report externally or internally in good faith, and it appears that he or she was mistaken as to its materiality or that the person who made the report has not fully complied with the procedural requirements set forth in this Procedure, such whistleblower shall nevertheless be afforded the relevant protections set forth herein.

The collegial crew responsible for handling whistleblowing reports (jointly the "Whistleblowing Support") is composed of two members who are duly trained and therefore responsible for collecting reports, acknowledging their receipt, and following up on them, including conducting the investigation into them, while ensuring the confidentiality of any information related to the whistleblower, the individuals mentioned in the report, and the subject of the report, in order to ensure confidentiality and prevent potential retaliatory acts of any kind. Whistleblowing Support is also responsible for keeping the whistleblower updated on the progress of the internal investigation and providing feedback to the whistleblower.

The Whistleblowing Support, will receive appropriate training and relevant updates regarding the handling of reports, conducting internal investigations, and privacy requirements.

3. Procedure

3.1 REPORTS

3.1.1 TIPOLOGIY OF REPORTABLE FACTS

All Recipients are invited to report Violations, i.e., actions, behaviors, or omissions having the characteristics outlined in paragraph 1 above.

Violations include, but are not limited to:

- I violation of anti-money laundering regulations;
- II administrative, accounting, civil or criminal offenses;
- III the illegal conduct relevant under Legislative Decree 231/2001;
- IV offenses falling within the scope of EU acts or national acts implementing them
implement them;
- V the acts or omissions that harm the financial interests of the EU;
- VI acts or omissions concerning the internal market, including the dissemination of insider information and/or violations of competition rules and unfair business practices, as well as violations concerning the internal market related to acts that violate tax rules or mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable legislation.

Examples of potential reportable facts or actions follow:

- an individual has failed, is failing or is likely to fail to comply with a legal obligation to which he or she is subject; or
- the health or safety of an individual has been, is, or is likely to be endangered; or
- an individual inside or outside the company is passing or copying sensitive and non-sensitive company documents or data/information/projects etc. in order to directly or indirectly transfer them to competitors
- a crime has been committed, is being committed or there is reason to believe that a crime is about to be committed.

Reports must be made disinterestedly and in good faith: reports made for the mere purpose of retaliation or intimidation, or groundless reports made with malice or gross negligence, will be sanctioned.

In particular, sending any communication that is unfounded on the basis of objective elements and that is, again on the basis of objective elements, made for the sole purpose of causing unfair harm to the person reported will be sanctioned.

The report must not concern complaints, claims or requests relating to an interest of a personal nature (i.e., that relate exclusively to the individual whistleblower's employment/collaboration relationship or the employment/collaboration relationship with superordinate figures) and, therefore, must not be used for purely personal purposes (e.g., complaints relating to economic treatment).

3.1.2 CONTENT OF THE REPORT

The report must provide the elements that will enable Whistleblowing Support to make the necessary checks to evaluate the truthfulness of the report.

To this end, the report must be sufficiently substantiated and, to the extent possible, provide the following information, along with any supporting documentation:

clear and complete description of the Violation underlying the report;

- Circumstances of time and place in which the reported facts were committed and the related conduct;
- biographical data or other elements (e.g., position held, function/area of belonging) that make it possible to identify the person who allegedly committed the Violation;
- any third parties involved or potentially harmed;
- indication of any other persons able to provide information on the facts underlying the report;
- any other information that may be useful in establishing the facts reported.

The identity of the whistleblower making the Protected Report and the identity of the Other Protected Persons (as defined below) shall always be confidential, and any communication in connection with the alleged or actual misconduct (including the report itself and/or any communication about it) shall not include identifying data or any other details that could lead to the identification of the whistleblower making the report or the Other Protected Persons.

Each of the Whistleblowers and Other Protected Persons may, separately, expressly consent in writing to the transmission of their data.

Reports without one or more of the above elements will be taken into consideration if they are sufficiently substantiated to allow effective verification and review of the reported facts, where appropriate, through interlocution - through the adopted platform - with the whistleblower and/or third parties indicated in the report and/or by other means.

3.2 PLATFORM AND REPORTING MEYHDS

Specialinsert srl has set up within its corporate website, a communication channel -email- for the management of Reports in compliance with the applicable regulations.

The adopted solution guarantees the separation of roles and security during all phases of the management of the Reporting.

The email exchange, if any, ensures that the confidentiality of the content of the Reports is maintained throughout the entire reporting management phase and protects the confidentiality of information through dedicated IT channels and tools.

A reporting person, if he or she has reasonable suspicion that one of the violations indicated in Section 3.1.1 above has occurred or may occur, has the option of making a report in the following ways:

- Open or anonymous reporting through the e-mail address: whistleblowing-support@specialinsert.it, directly accessible from the website at [www.specialinsert.it /Whistleblowing/](http://www.specialinsert.it/Whistleblowing/);
- Open reporting, through traditional postal channel c/o headquarters of Specialinsert srl- Via Monfalcone, 144- 10136 TORINO;
- Internal anonymous reporting, via the special reporting box located at all Specialinsert srl offices: Specialinsert srl- Headquarters- Via Monfalcone, 144- TORINO.
Specialinsert srl - production headquarters - Via Pavanello, 1 - Maerne di Martellago (VE).
Specialinsert srl- Uff. comm. and representative office, Via E. Cialdini, n.37- MILAN

The Whistleblowing channel, also allows reporting by filling out a special reporting form (below) Reports in anonymous form, that is, without any element that allows in the cases provided for by law to identify the author, will not be allowed.

Preparation and maintenance of the above mentioned communication channels is ensured by the Whistleblowing Support, in charge of receiving the report, possibly making use of collaborators specifically trained for the management of the reporting channel itself.

Consistent with regulatory provisions and its organizational and operational model, Specialinsert srl has decided to attribute to the Whistleblowing Support, in addition to the receiving activity, also those of examination and evaluation of the reports.

This examination and evaluation activity can also be carried out by the Whistleblowing Support with the support of external consultants-where necessary- suitably qualified.

If a member of the Whistleblowing Support is the presumed responsible of the violation or has a potential interest related to the Report such as to compromise impartiality of judgment, the activities of receiving, examining and evaluating Reports will be carried out by the **"Reserve Function."**

3.3 RECIPIENTS OF REPORTS

The recipient of reports is the Whistleblowing Support, who has the necessary skills to handle reports, including through dedicated training.

If the report is made to a person other than those identified above (e.g., to the hierarchical superior) and/or through channels other than those indicated in Section 3.2 above, the person receiving the report shall invite the whistleblower to forward the report in the manner provided for in this Procedure, informing him or her that only reports forwarded in this manner will be considered Protected Reports. Where, however, the whistleblower expressly declares that he or she wishes to benefit from the protections provided by the law or by this Procedure, or such a desire can be inferred from the report, the report should be forwarded, within 7 days of its receipt, to Whistleblowing Support using one of the channels indicated above, giving simultaneous notice of the transmission to the reporting person.

3.4 INVESTIGATION OF REPORT

Any investigative activities will be conducted as quickly as possible.

Within 7 days of receipt of the report, Whistleblowing Support will provide feedback to the whistleblower regarding the receipt of the report and the expected timeline for investigative activities. Whistleblowing Support may provide this information in a written report, or it may decide to arrange a meeting with the whistleblower. Such a meeting should be documented by the Whistleblowing Support.

Within 3 months from the date of the report, feedback on the outcome of the investigation shall be provided to the whistleblower.

If, for objective reasons related to the complexity of the investigation, the investigation is not concluded within this period, Whistleblowing Support will nevertheless provide the whistleblower with feedback on the ongoing activities and initial outcomes of the investigation, reserving the right to provide further feedback when the activities are concluded.

In any case, the content of such feedback should be without prejudice to any action taken as a result of the investigation.

In order to have timely visibility of the feedback, the whistleblower is asked to provide an e-mail address to which relevant communications regarding to their report will be sent and to verify any additional requests from Whistleblowing Support.

The latter preliminarily verifies whether the report is relevant and “at first sight” well-founded, if necessary with the help of an external professional advisor who is required to keep the activities carried out confidential.

As part of the internal investigation, Whistleblowing Support may request additional information and/or documentation from the Whistleblower. Whistleblowers should, to the extent possible, cooperate to comply with any reasonable request to clarify facts and/or circumstances and to provide (additional) information. Lack of information and/or the whistleblower's reluctance to cooperate may be grounds for the Whistleblowing Support to conclude that there are no concrete reasons to proceed.

Whistleblowing Support records the whistleblowing through an identification code/name, ensuring traceability and proper archiving of documentation even in later stages.

Whistleblowing Support classifies reports into:

- **Irrelevant reports:** the whistleblower will be informed;
- **Reports in dishonesty:** will be evaluated by the competent body for possible initiation of a sanctions procedure and/or, in the case of external collaborators, possible termination of the relationship;
- **Relevant reports:** the investigation phase will be initiated.

The investigation phase takes the form of carrying out targeted checks on the reports, allowing for the identification, analysis, and evaluation of elements that confirm the reliability of the reported facts.

Whistleblowing Support will carefully consider the possibility of engaging external professionals to assist in the investigation phase and:

- ensures full compliance with the confidentiality requirements set forth in Chapter 6 below;
- ensures that the audit is conducted in a diligent, fair and impartial manner; this implies that every person involved in the investigation must be informed - once the preliminary investigation has been completed of the statements made and evidence acquired against him or her and that he or she must be able to provide counter-arguments;
- may make use of technical advisers (such as external professionals or internal specialists of the Company).

3.5 OUTCOME OF THE INVESTIGATION

The investigation phase may end with:

negative outcome: in which case the report is dismissed;

positive outcome: in which case Whistleblowing Support will forward the outcome of the investigation to the relevant bodies of the organization so that they can take the necessary measures, including disciplinary measures. Feedback will be provided to the whistleblower at the conclusion of the investigation.

3.6 INFORMATION FLOWS

Whistleblowing Support provides Specialinsert srl Management annually with a summary on an aggregated and anonymous basis, by type, of reports received.

4. WHISTLEBLOWER PROTECTION AND RESPONSABILITY

4.1 CONFIDENTIALITY AND PROHIBITION OF RETALIATORY AND/OR DISCRIMINATORY ACT

Specialinsert srl guarantees the **maximum confidentiality** of the identity of the whistleblower, the reported subject and the subjects otherwise indicated in the report, as well as the content of the report and the related documentation, using, to this end, criteria and methods of communication suitable to protect the identity and integrity of the aforementioned subjects, also in order to ensure that the whistleblower is not subject to any form of retaliation and/or discrimination, avoiding in any case the communication of the data to third parties not involved in the process of managing the report governed by this Procedure. Except in cases where whistleblower liability is conceivable, the identity of the whistleblower must be protected in accordance with the law.

Therefore, subject to the above exceptions, the identity of the whistleblower cannot be disclosed, without his or her explicit authorization.

Violation of the duty of confidentiality constitutes a serious violation of the Whistleblowing policy and gives rise to the application of appropriate sanctions, which for employees are outlined in the Disciplinary Code, to which reference is made.

The same confidentiality requirements also apply to the persons involved/mentioned in the report.

A whistleblower who believes that he or she has been subjected to retaliatory conduct as a result of a previously made report may notify the National Anticorruption Authority ("ANAC") of any form of retaliation that he or she believes he or she has been subjected to (see Section 5 below).

Acts done in violation of the above prohibition against retaliation are not valid.

As mentioned above, in addition to the protection guaranteed to the whistleblower, the above protection measures will also be guaranteed against the following individuals/entities, referred to as "Other Protected Persons."

- facilitators (i.e., those who assist the whistleblower in the reporting process, operating in the same work context and whose assistance must be kept confidential);
- persons who are in the same work context as the whistleblower and who are related to the whistleblower by a stable emotional or family relationship within the fourth degree (e.g., relatives);
- colleagues of the whistleblower who are in the same work environment as him and have a regular and current relationship;
- entities owned by the whistleblower, as well as entities working in the same work environment of the whistleblower;
- other persons as specified in locally applicable laws.

4.2 WHISTLEBLOWER RESPONSABILITY

As mentioned above, appropriate sanctions may be applied to the Recipient who makes reports with malice or serious misconduct, in accordance with applicable provisions, including the Code of Ethics and, for employees, the Disciplinary Code.

Any forms of abuse of the whistleblowing system, such as pretextual, slanderous or defamatory reports and/or made for the sole purpose of harming the whistleblower or other persons, as well as any other hypothesis of improper use or intentional exploitation of whistleblowing channels, are also subject to the same sanction

5. OUTDOOR SIGNALING

In case the whistleblower has:

- already made an internal report according to Paragraph 3 above that has not been followed up within the time limits set forth in the same Paragraph; or
- Reasonable grounds for believing that, if it made an internal report, it would not be followed up effective follow-up or that the report itself could result in the risk of retaliation; or
- reasonable grounds for believing that the Violation may pose an imminent or obvious to the public interest;

the whistleblower can make an external report ("External Report") to ANAC.

This is also considered a Protected Report.

The report can be made in written or oral form through the channel implemented by ANAC and available at <https://whistleblowing.anticorruzione.it/#/>.

ANAC will ensure strict confidentiality of the identity of the whistleblower, the person involved and the person otherwise mentioned in the segnalation, as well as the content of the report and related documentation.

6. TRACKING, STORAGE AND PROCESSING OF PERSONAL DATAS.

The documentation used in carrying out the activities (even in the case of irrelevant reports) will be kept by Whistleblowing Support in a special protected computer database, located within the company server, managed in a confidential manner.

Reports and related documentation will be retained for the time necessary to process the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations provided for by the relevant regulations in force, except in the event of the emergence of specific needs aimed at the defense or protection of rights and/or legitimate interests of Specialinsert srl or third parties, including in the event of complaints, litigation or pre-litigation.

At the end of the retention period, the documentation will be deleted.

When, at the request of the whistleblower, the report is made orally in a face-to-face meeting with the Whistleblowing Support, this one, with the agreement of the whistleblower, documents the meeting through appropriate minutes, where the whistleblower can verify, correct and confirm the minutes of the meeting with his or her signature.

Personal data that are manifestly not relevant to the processing of a specific report will not be collected or, if accidentally collected, will be deleted without unnecessary delay.

7. DATA CONTROLLER OF PERSONAL DATA COLLECTED AND PROCESSED

The Data Controller of the personal data collected through the Reporting process, governed by this Procedure is **Dr. Cinzia Arduini (hereinafter, the "Data Controller")** pursuant to and in accordance with EU Reg 2016/679 ("GDPR").

Controller processes the personal data contained in the Report for the purposes identified in this Procedure, through the deputies and authorized parties, within the limits of the regulatory requirements, namely, for the collection, management and analysis of the Reports received both by computer and manually.

For the pursuit of the purposes indicated, any personal data contained in the Reports will be collected, processed and managed by Whistleblowing Support, as the function responsible for this policy, as well as by any individuals who contribute to the proper execution of the same, authorized to process or appointed as Data Processors pursuant to Article 28 of the GDPR.

These subjects will be specifically identified by the Controller, who will also provide special instructions on the methods and purposes of processing and ensure that they are subject to appropriate obligations of confidentiality and privacy.

Data Controller may also communicate, provided that it is necessary for the pursuit of the purposes of processing, the personal data collected to third parties belonging to the following categories:

- competent authorities. These entities will act as autonomous data controllers;
- companies/entities/associations that carry out, by way of example, consulting activities, support to the provision of services etc., which will act, as appropriate, as autonomous data controllers, or as data controllers on the basis of a specific agreement on the processing of personal data concluded pursuant to Article 28 GDPR.

8. DATA PROTECTION RIGHT OF THE WHISTLEBLOWER, THE REPORTED AND OTHER PROTECTED SUBJECTS

To the whistleblower, to the whistleblowed and the Other Protected Persons involved in the Whistleblowing and the related proceedings (so-called "Interested Parties"), the legislation on the protection of personal data recognizes, subject to the limitations identified by the relevant provisions of the law and, in particular, by Article 2-undecies of Legislative Decree 196/2003, specific rights such as.

(a) Right of access: i.e. the right to obtain from the Controller confirmation as to whether or not there is ongoing a processing of personal data and, if so, to obtain access to the personal data and the following information:

- (i) the purposes of the processing;
- (ii) the categories of personal data concerned;
- (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- (iv) when possible, the expected period of retention of personal data or, if not possible, the criteria used to determine such period;
- (v) the right to lodge a complaint with a supervisory authority; (vi) if the data are not collected from you, all available information about their origin. It is understood that even in case of the right of access, if the conditions are met, the Data Controller guarantees the protection of the identity of the Data Subjects.

(b) Right to rectification and erasure: in the cases provided for by the applicable provisions of law, the Data Subject may exercise the right to obtain the rectification of inaccurate personal data concerning him/her as well as, taking into account the purposes of the processing, the right to obtain the integration of incomplete personal data.

The Data Subject also has the right to obtain the erasure of personal data if there is any of the following reasons:

- (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (ii) the data are processed unlawfully;
- (iii) he or she has objected to the processing activity and there is no overriding legitimate reason;
- (iv) the personal data must be deleted to fulfill a legal obligation.

(c) Right to restriction of processing: the Data Subject has the right to obtain restriction of processing in the following cases:

- (i) for the period necessary for the Controller to verify the accuracy of the data whose accuracy has been contested by the Data Subject;
- (ii) in case of unlawful processing of personal data;
- (iii) even if the personal data are not necessary for the purposes of the processing, if they are processed for the establishment, exercise or defense of a legal claim;
- (iv) for the period necessary for the verification as to whether the legitimate reasons of the Controller prevail over your request to object to the processing.

(d) Right to object: the Data Subject has the right to object at any time, on grounds related to his or her particular situation, to the processing of personal data carried out on the basis of legitimate interest pursuant to Article 6(1)(f) GDPR.

e) Right to make a complaint and/or appeal: the Data Subject has the right to lodge a complaint to the Data Protection Authority and/or an appeal to the judicial authority if his or her data processing rights are deemed to have been violated.

9. SANCTIONING SYSTEM

The Disciplinary Code referred to in this Whistleblowing Procedure is the one adopted by Specialinsert srl and delivered -for approval- to each Specialinsert employee. The other sanctioning measures referred to in this Procedure may be of contractual and/or statutory and/or deontological nature and/or be of regulatory source (e.g. civil and/or criminal liability).

10. DOCUMENT HISTORY

Revision 1.0 - Issued December 22, 2023

Verified and approved by Specialinsert Management December 22, 2023



FACSIMILE OF REPORTING FORM

REPORTING FORM

Reporting the commission or attempted commission of any of the following offenses:

- (i) violations of the 231 Model, Code of Ethics, or unlawful conduct relevant under Legislative Decree No. 231/2001;
- (ii) violations of EU legislation in a very wide range of areas expressly set forth in the Annex to Directive (EU) 2019/1937 (among them: public procurement, financial services, product and transportation safety, environment, food, public health, privacy, network security, competition).

AUTHOR OF THE BEHAVIOR THAT IS THE SUBJECT OF THE REPORT

DETAILED DESCRIPTION OF THE BEHAVIOR ORIGINATING THE REPORT:

DATAS OF THE REPORTER (IN CASE OF NON-ANONYMOUS REPORTING)

Name:

Last Name:

Organizational Unit:

Phone:

E-Mail:

Date: _____

Signature: _____

PRIVACY POLICY

Specialinsert srl with registered office in Turin (TO), Via Monfalcone, 144 owner of the processing of personal data, pursuant to G.D.P.R. hereby informs you that your personal data acquired through this report will be processed exclusively for purposes related to compliance with the obligations arising from Legislative Decree 231/2001, as well as used, and inseguito stored, mainly in paper form.

Acknowledging the legitimacy of even "anonymous" reports, the provision of your data appears to be optional and a refusal to do so will not entail any consequences regarding the validity of the work of the Specialinsert srl Supervisory Board (hereinafter more simply SB). The reporter remains, in any case, personally responsible for any defamatory content of their communications and Specialinsert srl, through its SB, reserves the right not to consider reports produced in obvious "bad faith".

Specialinsert srl also reminds you that the data you provide must be relevant to the purposes of the report, so that the SB. will be free not to follow up on reports concerning conduct or subjects unrelated to the obligations arising from Legislative Decree 231/2001. Except for the fulfillment of obligations arising from the law, the personal data you provide will not have any scope of communication and dissemination.

Pursuant to the G.D.P.R., you may exercise the following rights:

- Obtain indication of the origin of your data as well as the purposes and methods of processing, the logic applied in case of processing carried out with the aid of electronic instruments, the identification details of the owner and those responsible as well as the subjects or categories of subjects to whom the personal data may be communicated
- Obtain the updating, rectification or, when interested, the integration of data; the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept in relation to the purposes for which the data were collected or subsequently processed; certification of the operations that have been brought to the attention of third parties, including with regard to their content; of those to whom the data have been communicated or disseminated, except where this proves impossible or involves a manifestly disproportionate to the protected right.
- Oppose, in whole or in part, for legitimate reasons, the processing of personal data concerning you, even if relevant to the purpose of collection;

For the exercise of the above rights, you may contact directly the Supervisory Board authorized to the treatment designated for this purpose by the Owner, by e-mail box:

whistleblowing-support@specialinsert.it

or,

by regular mail at the Supervisory Board c/o the headquarters of :
Specialinsert srl Turin (TO), Via Monfalcone, 144.

MODALITA' INSERIMENTO SEGNALAZIONE WISTRBLLOWING DA SITO AZIENDALE

Inserire Tab Whistleblowing in basso a dx della prima pagina in apertura sito (o dove ritenete più opportuno).

L'apertura della pagina Whistleblowing dovranno comparire una tendina con 2 documenti + un TAB:

- Whistleblowing procedura per la segnalazione di condotte illecite
- Whistleblowing Support (pagina con i dati di contatto)

IN VIA UNA SEGNALAZIONE

↓
Cliccando si deve aprire una casella POPUP che riporta la seguente info

Il whistleblowing è la segnalazione effettuata da un soggetto che, nel contesto lavorativo, viene a conoscenza di violazioni di disposizioni normative nazionali o dell'Unione europea che ledono l'interesse pubblico o l'integrità dell'amministrazione pubblica. Il D.Lgs. 24/2023, "Attuazione della direttiva (UE) 2019/1937 del Parlamento europeo e del Consiglio, del 23 ottobre 2019, riguardante la protezione delle persone che segnalano violazioni del diritto dell'Unione e recante disposizioni riguardanti la protezione delle persone che segnalano violazioni delle disposizioni normative nazionali", prevede che i soggetti del settore privato attivino propri canali di segnalazione che garantiscano la riservatezza dell'identità della persona coinvolta, del segnalante, dei soggetti che potrebbero essere destinatari di potenziali ritorsioni in virtù del ruolo avuto nel processo di segnalazione o del rapporto/legame con il segnalante nonché del contenuto della segnalazione e della relativa documentazione.

Le segnalazioni che non consentano di ricavare l'identità del whistleblower sono considerate anonime e, ove circostanziate, sono equiparate alle segnalazioni ordinarie. Ai sensi dell'art. 16, c. 4 del D.Lgs. n. 24/2023, le misure di protezione previste in favore del segnalante sono riconosciute anche nell'ipotesi in cui un whistleblower, inizialmente anonimo, che abbia denunciato di aver subito ritorsioni a causa della propria segnalazione, sia successivamente identificato. La segnalazione anonima sarà conservata, unitamente alla relativa documentazione, per un periodo di cinque anni decorrenti dalla data della sua ricezione, al fine di rintracciarla nel caso in cui il whistleblower comunichi all'ANAC di aver subito misure ritorsive a causa della stessa.

Se devi segnalare una ritorsione subita a seguito di una segnalazione precedentemente effettuata, la comunicazione deve essere inviata esclusivamente ad ANAC tramite le modalità previste e disponibili sul sito web dell'Autorità.

ho letto e preso visione della comunicazione (se non si fleggs, non si va avanti)

Sei a conoscenza di illeciti nel tuo ambito di lavoro?


In via una segnalazione non anonima

In via una segnalazione anonima

Cliccando uno dei 2 tab, i tab si apre un'altra finestra popup

See instruction " How to enter Whistleblowing report from corporate finger "on Privacy Policy

3) Motivo per cui ritieni che il fatto descritto sia una "condotta illecita":

4)  Allegare documentazione a supporto della segnalazione (se presente):

***Campo obbligatorio:**

5) Modalità di contatto:

Indicare un indirizzo di posta elettronica per le relative comunicazioni:

email:

NB: in caso di segnalazione anonima, creare una email generica che consenta di non risalire al segnalante.

SALVA E INVIA