

Whistleblowing

D. Lgs. n. 24 10 March, 10 2023



What is Whistleblowing?



The Whistleblowing **protects people who report violations** of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or private entity of which they have become aware in their work context.

Why is it important?



Because you can now report a violation, behaviour, act, or omission that harms the integrity of the company or the public interest. **FRASCOLD S.p.A.** promotes the dissemination and use of whistleblowing as a fundamental measure to **prevent and combat corruption and illegal conduct**, as well as to **protect** whistleblowers.

What is FRASCOLD Whistleblowing policy?



FRASCOLD S.p.A.'s Whistleblowing Policy regulates the process of sending, receiving, analysing and processing - including archiving and deleting - Reports from anyone coming from or transmitted, even in confidential or anonymous form, as well as protecting the Whistleblower and the persons involved.



Where can I find Whistleblowing policy?

You can find all the documentation about Whistleblowing on our website.

How can I report violations?

You can do this through the following internal channels:

through the IT platform accessible from the Company's website:

<https://frascoldwhistleblowing.integrityline.com>

in paper form, by letter sent with confidential/personal wording to the address:

Via Barbara Melzi, 103/105, 20027 Rescaldina (MI), for the attention of the Whistleblowing Committee;

direct meeting with the Whistleblowing Committee;

The names are in the policy document.

through a voice messaging and morphing system accessible from the Company's website:

<https://frascoldwhistleblowing.integrityline.com>

Only in certain circumstances via external channels:

made available to the National Anti-Corruption Authority (ANAC);

public dissemination (press, social networks, etc.).

What protection for those who report violations?



The Company guarantees the **absolute confidentiality** of the identity of the Whistleblower, the Person Involved and the person mentioned in the report.

Who, under the conditions set out in the Whistleblowing Policy, makes the report is protected by the prohibition of retaliation, even indirect, against him (including, dismissal, suspension, demotion in rank or failure to promote, demotion, negative references, intimidation or harassment, reputational damage, etc.).

The following are not considered violations and therefore do not apply:

- disputes, claims or requests related to a personal interest of the Whistleblower;
- complaints relating to activities of a commercial nature (e.g. complaints).

The Company will take the most appropriate **disciplinary** and/or legal measures against anyone who improperly uses the whistleblowing channels by making **reports with intent or gross negligence** that prove to be **unfounded or opportunistic and/or** for the sole purpose of slandering, defaming or causing unjust damage and/or prejudice to the Person Involved or to other subjects mentioned in the report.