

**INSTRUCTION FOR REPORT  
MANAGEMENT AND PROTECTION OF THE  
INFORMER (WHISTLEBLOWING)**

## Whistleblowing



### Who is involved?

Montecolino S.P.A.



### Who is it for?

- to all the employees (subordinate workers)
- To members with administrative, management, control, supervisory or representation functions
- To self-employed workers who carry out their own activities for the company
- To volunteers and interns (paid or unpaid) who work for the company
- To freelancers and consultants who work for the company



### What is it for?

Ensure protection, not only for the protection of privacy, but also from possible retaliatory measures for those who expose themselves with reports contributing to the prevention of risks and prejudicial situations to society and consequently to the collective public interest.

Provide guidelines and operational instructions to the reporter regarding the subject, content, recipients and methods management of reports as well as the forms of protection that are offered in line with European and local regulatory references.



### When report is required?

When you become aware of illicit conduct well-founded or presumed based on precise factual elements and concordant ones referring to the working context.

The subject of reporting may be specific violations of national regulations and EU legislation and/or illicit acts of a different nature which harm the interest public or the integrity of society.

News which are clearly unsubstantiated, reports which are already of public domain or come from poorly reliable sources are not included into the list of reportable violations.



### Who receives the report

Montecolino has nominated an internal and an external subject who is in charge of receiving the reports.



### What cannot be reported?

(i) Disputes, claims or requests related to a personal interest of the person who is reporting and which relate exclusively to his individual working relationships or to his relations with figures in higher hierarchies










(ii) Reports of breaches in the field of national security, as well as procurement relating to defence or national security aspects



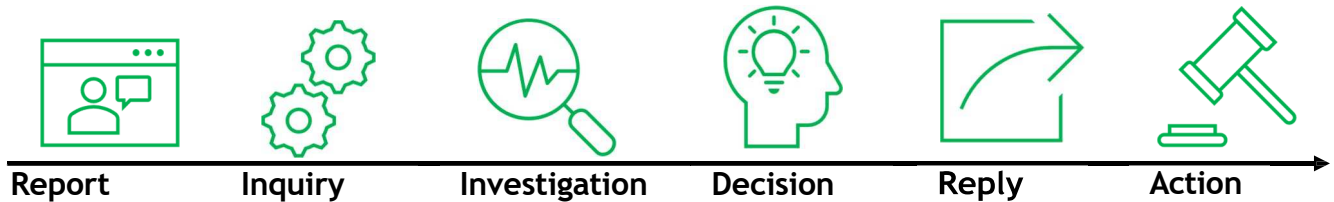
### How to make a report?

Montecolino S.p.A adopted an internal channel on its website: <http://www.montecolino.it>

## HOW TO MAKE A WHISTLEBLOWING REPORT ON TESEO PLATFORM

	<p>Log in to the web page and check the privacy policy. Select the link of the society you'd like to report for and follow the instruction – whistleblowing section.</p>
	<ul style="list-style-type: none"> <li>- Click on <b>“new report”</b> and fill the mandatory fields (*). Other information regarding the identity of the reporter are not mandatory. The report must be detailed with:</li> <li>- <b>Time and place where the event took place;</b></li> <li>- <b>Description of the event (documents can be enclosed)</b></li> <li>- <b>The elements that allow to identify the person to whom the reported facts are attributed.</b></li> </ul>
	<p>The platform will ask you the permission to disclose your identity also to people which are not competent to receive and manage reports.</p>
	<p>When the report is complete click on <b>“complete report and send”</b></p>
	<p>The platform will give you an alphanumeric code (ticket code) which you need to save and don't give to others. This will be the only method to open again the report and check the status of the platform replies.</p>
	<p>Once the report is completed, you'll get a notify visible directly in platform.</p>
	<p>You'll receive the feedback of your report within three months.</p>
	<p>Anonymous reports can be submitted as well but they will be managed in different ways according to the local laws.</p>
	<p>The information on the platform are saved for five years.</p>

## SCHEMA DI FUNZIONAMENTO DELLA SEGNALAZIONE



### REMEMBER:

- ✓ Montecolino Spa promotes the ethical principles of respect for the integrity and protection of the reporter;
- ✓ Montecolino is committed to protect the privacy of all people involved;
- ✓ Reports are securely stored within the platform
- ✓ all reports are subject to preliminary investigation, you might be contacted for further information by authorized parties.
- ✓ The report is confidential.