



G.SCHNEIDER S.p.A.

Registered Office:

Corso Europa, 7

20122 MILANO (MI)

Administrative Office:

Strada Trossi, 2

3871 VERRONE (BI)

To employees/collaborators

To all those who may concern:

Subject: Legislative Decree 24/2023 - Whistleblowing – General Information

On March 10, 2023, Italy transposed European Directive 2019/1937 and adopted Legislative Decree no. 24 concerning “the protection of people who report violations of European law and the protection of people who report violations of national legislation.”

This law applies to public institutions and private entities with over 50 employees, as well as to ones with a lower number of workers if the entity has adopted organizational model 231.

Our company has adopted a **specific procedure** to handle these kinds of reports, provided the conditions have been met.

Those who report wrongdoing within the company/institution are commonly defined as “**whistleblowers**”. This term not only refers to an institution’s or company’s employees and collaborators, but also to other parties (e.g., supplier employees, shareholders, partners, etc.) who report violations of national or European legislation they have become aware of in a workplace environment which are detrimental to the public interest or the integrity of the public administration or private body.

Moreover, for those who have adopted an organizational model pursuant to Directive 231/2011, whistleblowing may also cover so-called “predicate offenses” and the model itself.

“**Whistleblowing**”, in the intentions of the legislator, is an expression of a sense of civic duty. Through whistleblowing, the whistleblower contributes to exposing and preventing risks and detrimental situations for the organization to which he or she belongs.

The nature of the revelations or reports can vary: violations of a law or regulation, threats to the public interest (as in the case of corruption or fraud), serious and specific situations which could endanger public health and safety, etc.

Whistleblowing, therefore, functions as a significant prevention tool.

As part of the procedure put into place, the company has established:

- The “channel” through which one can make reports (the so-called “**internal channel**”)
- The persons authorized to manage the reports and establish the procedure
- The process following the whistleblowing
- The communications with the whistleblower
- Protections for the whistleblower and other parties
- Safety measures
- The procedures and policies covering privacy

Some useful information has been provided below.

Who can report wrongdoing

Employees, the self-employed, collaborators who supply goods and services or which carry out work on behalf of the company/institution, freelancers and consultants, paid and unpaid volunteers and interns, shareholders, partners, and those with administrative, managerial, compliance, safety, or representative roles.

Those individuals with whom the working relationship has ended can also make reports, if the whistleblowing regards something which happened during the working relationship. Additionally, candidates looking to be hired can also make reports if they have become aware of violations during the selection process or in other phases of the pre-contractual negotiation.

What can be reported

The following can be reported:

- Illegal conduct covered by Legislative Decree no. 231/2001 (“predicate offenses”) and violations of the relevant organizational and management models.

What is not to be reported

The whistleblowing must concern incidents which took place in a “**workplace environment**”. This term includes past or present work or professional activities carried out in the context of the relationships referred to in article 3, paragraphs 3 or 4 of Legislative Decree 24/2023 [*employees, collaborators, partners, shareholders, interns, volunteers, freelancers, even during a trial period or even if the relationship has ended*] through which, regardless of the nature of such activities, a person acquires information about violations and in which he or she could run the risk of retaliation in the case of whistleblowing or public disclosure or reports to the judicial or financial authorities.

Therefore, whistleblowing which regards personal or familial relationships or other relationships which have no relevance to the workplace environment or the organizational model are not included.

Moreover, the procedure does not apply to complaints or reports which concern **individual work relationships or which concern relationships with one’s superiors** (art. 1 Legislative Decree 24/2023).

Therefore, by way of only example, it does not concern questions related to the management of working relationships, e.g. missed payments, pay grade, business organization, schedules, etc. (however, it could regard discriminatory behavior or a lack of respect for gender equality).

The content of the reporting

The reports must be as detailed and documented as possible to provide the person who is handling the same with the necessary information to carry out a potential investigation.

For example, there must be a clear and complete description of the incident which is subject to the whistleblowing; there must be a clear indication of the relevant time period; the person responsible for the actions must be able to be identified; and potential documents in support of what has been described must be provided.

To aid in reporting, a form has been included which can act as a framework to carry out the whistleblowing, if the dedicated platform is not used. (see **Annex 1**).

Anonymous reporting

Anonymous reporting will be dealt with in the same manner as ordinary reports. They will be dealt with according to the criteria laid out in this procedure, where applicable, but the reports must be substantiated and documented.

The “internal” reporting channel

The company/institution has adopted the following ways to file a report

- A) Access to the Platform <https://gschneider.trusty.report/>
- B) Statement via registered letter (anonymously, without identifying the sender and clearly writing “Reporting illegal activity” or “Whistleblowing” on the envelope)
- C) Possible request for a meeting with the whistleblowing managing authority

The details and ways to use the channel are described in detail in **Annex 2**.

Managing authority (recipient)

The company/institution has appointed some expressly authorized and trained persons who are sworn to confidentiality with the management of the whistleblowing reports.

After a report is filed, the whistleblower will receive (at the supplied address or via the platform) a receipt of delivery, and will receive feedback on the report within three months. Additionally, the whistleblower will receive the final result of the investigation, if it is to follow.

The managing authority tasked with examining the reports is the Supervisory Body appointed as part of the organizational model in accordance with Legislative Decree 231/2001.

If the whistleblowing concerns the managing authority, the report should be addressed to the HR manager, without the use of the platform.

For operational details, see **Annex 2**.

Protections for the whistleblower

The identity of the whistleblower is protected both in the reporting phase and in the following phase, except in cases in which the identity of the whistleblower must be determined by law (e.g., criminal, tax, or administrative investigations, inspections by supervisory bodies, etc.)

Annex 3 contains information concerning the processing of the personal data of the whistleblower.

If the report is based, in whole or in part, on the identity of the whistleblower, and if knowledge of the identity of the whistleblower is indispensable for the defense of the accused, then the report is only usable in the presence of the express consent of the whistleblower to reveal his or her identity. In such a case, the required consent will be requested and obtained.

The identity of the persons involved and mentioned in the report is protected until the conclusion of the procedures launched as a result of the report in accordance with the same guarantees provided to protect the whistleblower. Due to the principle of minimization, the data of people who are not relevant to the report will be deleted.

No form of retaliation or discriminatory measure is allowed or tolerated against the whistleblower (as well as to other persons ¹).

The measures protect against:

- retaliatory acts, including, by way of example, firing, demotion, a transfer to a new location, any other action that leads to negative effects to the employment contract, and any other “punitive” behaviors, as with requests to submit oneself to medical or psychiatric tests.
- discriminatory acts which include economic and financial damages, also in terms of a loss in income or opportunities.

The protection measures do not apply when, even as a first instance judgment, the criminal responsibility of the whistleblower for crimes of defamation or slander or his or her civic liability, for the same reason, in the case of intent or gross negligence is ascertained. In such cases, a disciplinary measure is taken.

External whistleblowing and public dissemination

In accordance with the legislation, no other types of whistleblowing are provided for.

Further information

Further details or information into the procedure and the reports in question can be requested by writing an email to the following address human.resources@gschneider.com.

Annexes

1. Whistleblowing form
2. Accessing the platform
3. Privacy policy

Biella, December 16, 2023

G.Schneider S.p.A.

¹ The following persons are due protection even if they are not whistleblowers: i) facilitators (physical persons who assist the whistleblower in the reporting process and work in the same workplace environment and whose assistance must kept confidential); ii) persons in the same workplace environment as the whistleblower—or the person who has filed a complaint against the judicial or financial authority or made a public disclosure—who are connected to that person by a stable emotional bond or are within the fourth degree of kinship; iii) the colleagues of the whistleblower—or the person who has filed a complaint against the judicial or financial authority or made a public disclosure—who work in the same workplace environment and currently and regularly have a relationship with the same; iv) the entities owned by the whistleblower—or the person who has filed a complaint against the judicial or financial authority or made a public disclosure—or for whom the same person works, as well as to the entities which work in the same workplace environment as the aforementioned individuals.

Annex 1

WHISTLEBLOWER DATA	
NAME AND SURNAME	
QUALIFICATION	
ROLE	
DEPARTMENT	
TELEPHONE	
E-MAIL	
ILLEGAL CONDUCT DATA/INFORMATION	
DESCRIPTION OF THE ILLEGAL CONDUCT	
PERSON(S) WHO HAS/HAVE CARRIED OUT THE ILLEGAL CONDUCT (Name, Surname, Qualification)	
OTHERS POTENTIALLY INVOLVED	
DATE/PERIOD IN WHICH THE INCIDENT OCCURED	
PHYSICAL LOCATION IN WHICH THE INCIDENT OCCURED	
MANNER IN WHICH THE INCIDENT OCCURED	
OTHERS WHO COULD POTENTIALLY COMMENT ON THE INCIDENT (Name, Surname, Qualification, Contact details)	
OTHER USEFUL INFORMATION	
ATTACHED DOCUMENTS	

Annex 2

Internal channel

Access and methods

A) PLATFORM USE

The company has implemented the secure whistleblowing platform **Trusty Report**.

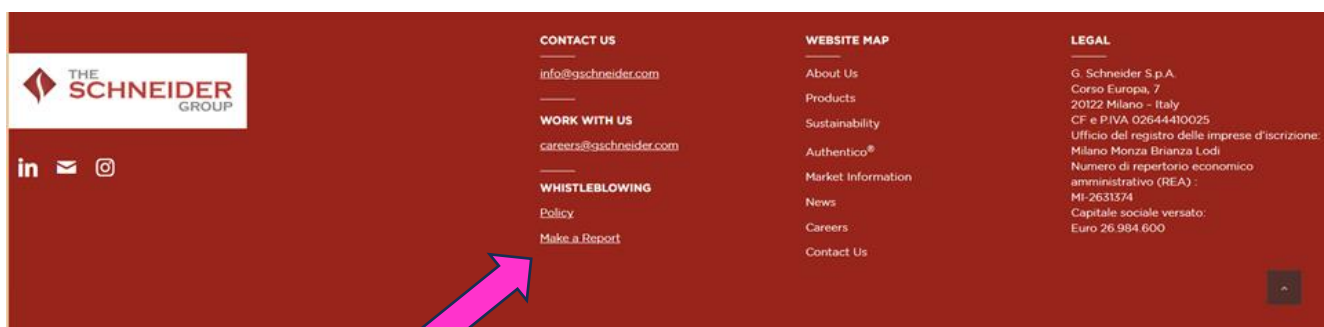


(<https://trusty.report/it/>).

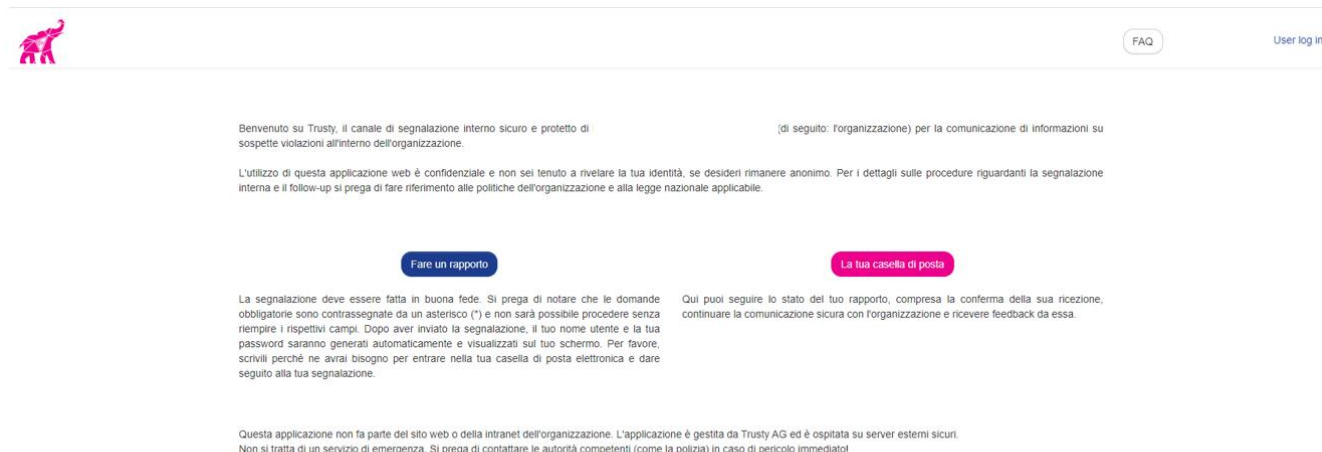
In particular, it is possible to file reports by directly connecting to the company-exclusive platform via the following link: <https://gschneider.trusty.report/>

The platform ensures cybersecurity and whistleblower confidentiality.

In addition to the aforementioned URL, the platform can be reached via the link in the footer of the company's website. (www.gschneider.com).



By clicking on “Make a report” you will enter Trusty Report



For the first report, you will need to click on the blue “Make a report/Fare un rapporto” icon.

Fare un rapporto

La segnalazione deve essere fatta in buona fede. Si prega di notare che le domande obbligatorie sono contrassegnate da un asterisco (*) e non sarà possibile procedere senza riempire i rispettivi campi. Dopo aver inviato la segnalazione, il tuo nome utente e la tua password saranno generati automaticamente e visualizzati sul tuo schermo. Per favore, scrivili perché ne avrai bisogno per entrare nella tua casella di posta elettronica e dare seguito alla tua segnalazione.

Before proceeding, you will need to confirm that you have read the privacy policy and then click on "Next/Avanti":

Segnalare una violazione

Utilizzo sicuro dell'applicazione

Se non vuoi rivelare la tua identità, fai attenzione a non inviare alcuna informazione che possa identificarti personalmente. Controlla che la tua connessione internet sia sicura e che il browser che stai usando mostri l'icona di un lucchetto. Entrare direttamente nell'applicazione salvando la pagina di ingresso nei segnalibri.

La Trusty AG protegge il vostro anonimato tecnico e fa in modo che la vostra identità non possa essere rintracciata con mezzi tecnici.

Trattamento dei dati

L'organizzazione è il responsabile del trattamento dei dati personali inviati.

Dettagli

Confermo di aver letto e compreso le avvertenze sulla sicurezza, la riservatezza, le disposizioni sul trattamento dei dati, così come i miei obblighi sull'anonimato, e accetto queste condizioni.

Avanti

Pagina 1 Pagina 5

Afterwards, you will need to indicate the country which the report is coming from:

Segnalare una violazione

In quale paese è avvenuta la presunta violazione? *

Italia

Indietro

Avanti

Pagina 2 Pagina 5

You can then proceed to make your report and potentially attach documents:

Segnalare una violazione

Per una buona elaborazione del vostro rapporto è importante fornire quante più informazioni possibili sull'argomento. Le domande obbligatorie sono contrassegnate da un asterisco e non sarà possibile procedere senza compilare i rispettivi campi. Le informazioni fornite nei campi non obbligatori sono benvenute, tuttavia, è possibile saltare questi campi se non si dispone delle conoscenze necessarie.

Quando e dove è avvenuta la violazione?

Persone sospettate di essere coinvolte.

Nome e cognome

Posizione

Organizzazione

+

Qualcun altro è a conoscenza della violazione?

Nome e cognome

Posizione

Organizzazione

+

Per favore, descriva la violazione con parole tue *

Si prega di notare che qualsiasi persona segnalata può essere avvisata della segnalazione dall'organizzazione in un momento appropriato.

[Allegare i documenti](#)

Se si desidera caricare più di un documento, selezionare più documenti tenendo premuto il tasto Control mentre si fa clic sui documenti.

Prima del loro invio, controllate che i vostri file non contengano metadati che possano rivelare la vostra identità. Si consiglia di inviare i documenti in formato pdf o in formato cartaceo all'indirizzo dell'organizzazione e di scrivere il tuo nome utente che ti verrà assegnato al termine dell'invio.

Indietro

Avanti

Pagina 3 Pagina 5

Once you have completed the report, click "Next/Avanti".

At this point, the system will ask you if you would like to send an anonymous report or if you would rather state your identity (please note that anonymous reports will only be considered if they contain relevant, detailed, and documented facts which allow the recipient to carry out investigations)

Segnalare una violazione

Puoi inviare la tua segnalazione in forma anonima, oppure puoi decidere di rivelare la tua identità all'organizzazione, subito o anche in seguito. In entrambi i casi ti verranno assegnati un nome utente e una password, che potrai utilizzare per accedere alla tua casella di posta.

La divulgazione dell'identità della persona che fa la segnalazione di solito permette un'elaborazione più produttiva ed efficiente della segnalazione e la sua protezione contro le ritorsioni. Si prega di fare riferimento alle politiche dell'organizzazione per ulteriori dettagli sulla protezione contro le ritorsioni e la riservatezza.

Sei disposto a rivelare la tua identità? *

- No, preferisco rimanere anonimo.
- Sì, vorrei rivelare la mia identità.

Indietro

Avanti

Pagina 4 Pagina 5

If you decide to provide your data, the system will request some mandatory information:

Segnalare una violazione

Allo scopo di elaborare la vostra segnalazione, i dati personali possono essere consultati, elaborati e utilizzati dal personale autorizzato dell'organizzazione. Se necessario, i dati personali possono essere comunicati alla polizia e/o ad altre autorità di polizia o di regolamentazione. I dati personali inviati saranno conservati ed elaborati secondo la politica dell'organizzazione e per tutto il tempo in cui l'organizzazione ha il legittimo interesse di elaborare la segnalazione (compresa la conduzione di eventuali indagini) e, se del caso, avviare le sanzioni. L'organizzazione garantisce la privacy dei dati personali e li tratterà in conformità con le relative leggi sulla protezione dei dati personali.

Avete il diritto di conoscere i vostri dati personali, di ricevere i vostri dati personali in un formato elettronico generalmente leggibile, di fornire correzioni e di richiedere che il trattamento dei vostri dati personali sia limitato. Il diritto alla cancellazione dei vostri dati personali è limitato all'interesse legittimo dell'organizzazione descritto sopra.

Inserisci qui i tuoi dati:

Nome e cognome *

Cognome e nome *

Indirizzo e-mail

Numero di telefono *

Relazione con l'organizzazione

Ricevere notifiche via e-mail

Per favore, inviatemi le notifiche delle risposte via e-mail.

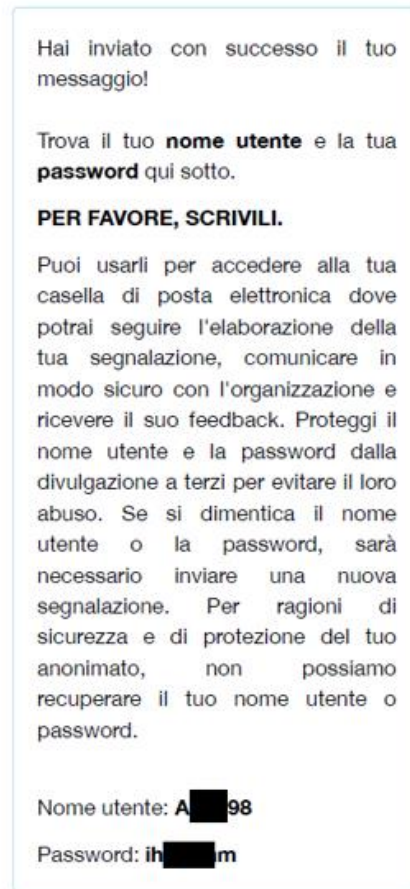
Indietro

Invia

Pagina 5 Pagina 5

Once the final form is completed, it is possible to send the report by clicking on “Send/Invia”.

At this point, the whistleblower will be notified that the report has been sent. The whistleblower’s login credentials will be visible in the notification. These credentials will be the only way to access the platform and verify the status of the case or make additions to the report:



Accesso

Inserisci il tuo nome utente e la tua password nei campi sottostanti. Se è la prima volta che accedi, usa il nome utente e la password che hai ricevuto dopo aver completato l'invio del tuo messaggio.

Nome utente

Password

The case will be given a reference number.

The recipient (manager) will be notified by email that a report has been received by the system (with none of the whistleblower's data).

The recipient will then use his or her credentials to verify the contents of the report.

Through the platform, the recipient will be able to communicate with the whistleblower, ask for clarifications, documents, etc., if the recipient does not decide to use the other communication channels indicated by the whistleblower (e.g., by phone).

Processing of report

Owner of the case: Case not assigned

Conflict of interest: Nobody

Current status: Received

Related cases: None

Severity:

Report

Reference number: R202302

Source type: Direct

Entry date: 28.11.2023

Country: Italy

When and where did the breach occur?: hdjidsj

Persons suspected to be involved:

Is anyone else aware of the breach?:

Describe event: kidklaski

Files: /

Are you willing to disclose your identity?: No

Dialogue box

No messages

History log

Event	Performed by	Date
View case	Avv. Rodolfo Rosso	20.12.2023
View case	Avv. Rodolfo Rosso	20.12.2023
View case	Avv. Rodolfo Rosso	28.11.2023
View case	Avv. Rodolfo Rosso	28.11.2023

More

The whistleblower will receive a message that there is new activity related to the report and will be able access it by using the login credentials, providing what has been requested

Segui il tuo rapporto

Il contenuto della segnalazione non viene mostrato per motivi di sicurezza.

Data della segnalazione: 28.11.2023
Stato del caso: Ricevuto

Attualmente nessun messaggio dall'organizzazione

La tua risposta

Se si desidera caricare più di un documento, selezionare più documenti tenendo premuto il tasto Control mentre si fa clic sui documenti. Prima del loro invio, controllate che i vostri file non contengano metadati che possano rivelare la vostra identità. Si consiglia di inviare i documenti in formato pdf o in formato cartaceo all'indirizzo dell'organizzazione e di scrivere il tuo nome utente che ti verrà assegnato al termine dell'invio.

B) OTHER METHODS

It is possible to send the reports via letter or registered letter (without a return receipt) to:

- **G. Schneider S.p.A. – Strada Trossi, 2 – 13871 Verrone (BI)**

or

- **Atty. Rodolfo Rosso – Via Colombo, 4 – 13900 BIELLA**

The letter is to be sent in an anonymous closed envelope (without a sender) with “**reporting illegal activity**” or “**whistleblowing**» written on the envelope.

It is preferred that the envelope contain another envelope with the report information inside.

The form for reporting the information (purely indicative) can be found in **Annex 1**.

One can always request a meeting with the recipient by making a written or telephone request to:

- **Atty. Rodolfo Rosso**

Via Colombo, 4 – 13900 BIELLA

rodolforosso@fcrlex.it

phone (+39) 015 355391

However, no details concerning neither the report nor the persons involved should be given in the request. It is only necessary to identify one’s company affiliation and express one’s desire to make a report with the manager.

If the report concerns the recipient, it will not be possible to use the platform. In this case, the company chairman must be contacted in writing or verbally, using these means:

via letter or registered letter (without a return receipt) to:

- **G. Schneider S.p.A. – Strada Trossi, 2 Verrone (BI)**

to the attention of the Human Resources Department

The letter is to be sent in an anonymous closed envelope (without a sender) with “**reporting illegal activity**” or “**whistleblowing**» written on the envelope.

It is preferred that the envelope contain another envelope with the report information inside.

Alternatively, the head of HR can be contacted by phone or in person with a request for a meeting to be held at the company’s premises.

TERMS

Within 7 days of submitting the report, the whistleblower will be notified of the acceptance of the report.

Within 3 months, the whistleblower will be supplied with feedback on the same.

Annex 3

Privacy Policy

E.U. Regulation 2016/679 and Legislative Decree 196/03 (“Privacy Code”) Whistleblowing (Legislative Decree 24/2023) Policy

1. Foreword

We inform you that pursuant to E.U. Regulation 2016/679 and Legislative Decree 196/03 (“Privacy Code”) and subsequent amendments, that the data you provide, or acquired, as part of the whistleblowing process, whose specific procedure has been defined by the company/institution, will be processed in compliance with the legal provisions by subjects involved in the aforementioned procedure, without prejudice to the obligation of confidentiality and privacy as well as requirements established by law (Legislative Decree 24/2023).

2. Data processed and purpose

The data processing, generally of a non-confidential nature, is aimed exclusively at the fulfillment of legal obligations within the whistleblowing process, as analytically established by the law and the procedure defined by the company and as integral part of the model pursuant to Legislative Decree 231/2001.

3. Legal basis of the processing

The legal basis of the processing is constituted by the aforementioned legislation (Legislative Decree 24/2023 and subsequent amendments).

The legal basis is also constituted by the express consent of the data subject for the revelation of the identity of the data subject; especially in the case in which the disciplinary action of the accused is based, in whole or in part, on identity of the whistleblower, and if knowledge of the identity of the whistleblower is indispensable for the defense of the accused.

In this case, the whistleblower will be requested to provide or deny his/her consensus.

4. Recipients of the data

The data is not subject to disclosure to third parties unless it is part of the procedure or requested by investigative bodies.

5. Data retention period

The data will be conserved for the period required to complete the procedure and resulting requirements, subject to judicial or disciplinary needs, and for a maximum period of 5 years.

6. Obligation

The provision of the data necessarily derives from the report which has been made.

7. Type of processing

The data will be entered into our archives, specifically in the “Whistleblowing” database, and its processing, which may be processed by automated and/or paper tools, will include all of the operations or set of operations provided for by art. 4. no. 2 of the Legislation and the operations needed for the processing in question and specifically: collection, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication via transmission, dissemination or any other form made available, evaluation or interconnection, restriction, deletion, or destruction.

The controller has made sure to verify the integrity of the safety measures adopted.

8. Authorized persons

The data controller has made sure to identify and train one or more persons who are authorized expressly for data processing and also bound to the specific obligations in Legislative Decree 24/2023 concerning confidentiality.

9. Data controller

The data controller is G.Schneider S.p.A. Corso Europa n. 7 – 20122 Milano.

10. Data protection officer

With regards to entrusting to external persons with some activities on behalf of the Controller (e.g. the management of whistleblowing reception), the latter has made sure to name an external data officer, defining the activity and acquiring the information concerning security measures. More information is available via a request to the email address dataprotection@gschneider.com.

11. Data transfer

The data, in compliance with the confidentiality provided for by Legislative Decree. 24/2023, will not be transferred or conserved outside of the E.U.

12. Rights of the data subject

Based on art. 2 undecies of Legislative Decree 196/2003 referenced in art. 13 of Legislative Decree 24/2003, the right to access personal data, the right to amend it, the right to cancel it or the so-called right to be forgotten, the right to restriction of processing, the right to personal data portability and the right to oppose processing, or the right of complaint to the Guarantor may be subject to limitations or not be exercised if the exercise of the same could be effectively or concretely detrimental to the subject who did the whistleblowing.

Based on the ANAC guidelines, the exercise of these rights could be effectively or concretely detrimental to the privacy protection of the identity of the whistleblower and therefore these rights are precluded in the data processing related to the whistleblowing procedure.

The Data Controller