



TINEXTA GROUP

# Whistleblowing Management

## Whistleblower User Manual

August 2023

This manual is aimed at describing the use of the web application " *Whistleblowing*", used by Sixtema S.p.A. to make reports in compliance with the provisions of Legislative Decree No. 231/2001 and Legislative Decree No. 24 of 10 March 2023, implementing EU Directive 2019/1937 concerning the protection of persons who report breaches of Union law.

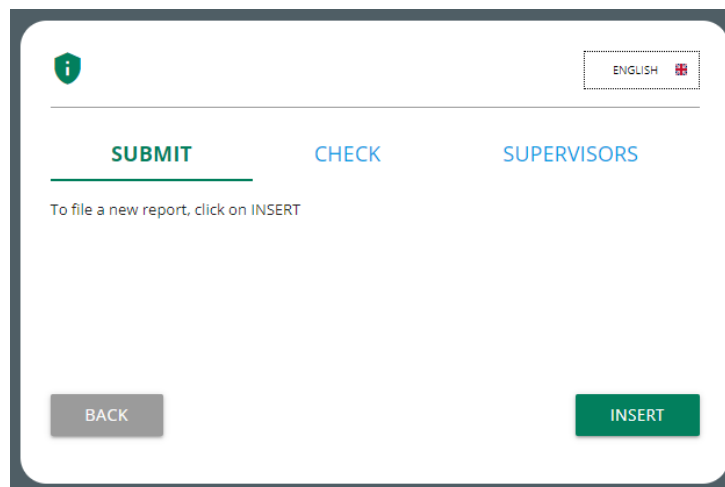
**NOTE** If the Whistleblower has not received a reply to the report made or has well-founded reasons to believe that the breach may constitute an imminent or obvious danger for the public interest, he/she may refer to the external reporting channel made available by the National Anticorruption Authority (ANAC).

Below are the steps to be followed within the website for drawing up, sending and monitoring the report.

<https://digitalplatform.unionefiduciaria.it/whistleblowingnew/it/accessoprincipale/identificazionegruppo?TOKEN=TINEXTAWB>

## Step 1 - Submit the reporting activity:

Click on the **'INSERT'** button



You will land in the welcome section from where you will be able to select the type of reporting.



In this step, the report can be entered. The **'INSERT REPORT'** button allows access to the next step.

## Step 2 - Changing the reporting channel

In this section, you are initially asked to select the type of report if written or voice and then the Group Company to which the report refers.

Whistleblowers can choose from two different channels, one ordinary and one alternative, to ensure that the subject in charge of receiving, examining and evaluating the Report is not hierarchically or functionally subordinate to the eventual Reported subject, is not itself the presumed responsible for the violation and does not have a potential interest related to the Report that could compromise the impartiality and independence of judgment.

Since the Supervisory Board (SB) is the main manager of the procedure, indicate whether the reported subject belongs to this Function so as to direct, in this case, the Report to the alternative channel.

**Does the Reported subject belong to the internal member of the Supervisory Board (SB) or whether he/she has a potential interest related to the Report that would compromise impartiality and independence of judgement?**

**NO / I DON'T KNOW**

**YES** - In this case, you report will be redirected to the alternative channel, and transmitted only to the external members of the Supervisory Board (SB).

CONTINUE

This section also requires an indication as to whether the report concerns the **internal member of the Supervisory Board (SB)** or whether he/she has a potential interest related to the report such as to compromise impartiality and independence of judgement.

In fact, if the answer is affirmative (**YES**), in order to safeguard impartiality and independence of judgement, an **alternative channel** will be used, which will forward the report only to the external members of the Supervisory Board, thus preventing the internal member from being aware of the report. The '**CONTINUE**' button allows access to the next step.

## Step 3 - Preliminary informations:

Whistleblowing Report

1 ————— 2 ————— 3 ————— 4

### Preliminary Informations

To which company or entity does the report refer?\*

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Country in which the alleged violation occurred\*  
Choose your option ▼

Which area of the company does the report refer to?\*

Choose your option ▼

If the item is not present, indicate here (max 4000 char)

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Fields marked with \* are mandatory

BACK CONTINUE

This step requires the indication of the company to which the facts and alleged violations relate. You are also requested to select the country and the business area (company function) concerned. It is possible to enter the relevant area manually if it is not in the drop-down menu. The '**CONTINUE**' button allows access to the next step.

## Step 4 - Fill in your report:

**Fill in your report**

Who are the main parties or subjects involved?\*

---

Place and date / time frame in which the events in question occurred\*

---

Attach any documents useful for reporting  
(remove metadata from your documents before attaching them)  
Drag files on this control or select them after clicking on button.  
To do a multiple selection, keep down "CTRL" key and click on the desired files.

**FILE**

---

The conduct is illegal because:\*

it is a violation European Union law, by way of example only, in the field of: public procurement, financial services, products and markets and the prevention of money laundering and terrorist financing, product safety and compliance, transport safety, environmental Protection, public health, consumer protection, protection of privacy and protection of personal data and security of networks and information systems

it is an administrative, accounting, civil or criminal offence

it is a crime set forth in Legislative Decree no. 231/2001 (specify which one) or is a violation (even presumed) of the Organizational, Management and Control Model of the Company

violates the Tinexta Group Code of Ethics and Conduct

it is a violation, presumed or ascertained, of the Company procedures or, in any case, of the internal regulatory system

it is a violation of Environmental, Social & Governance matters

other (specify)

Specify (max 4000 char)

---

Facts description\*

---

Fields marked with \* are mandatory

**BACK** **CONTINUE**

The Whistleblower in this step will fill in the report, which must be substantiated.

It should be noted that circumstantiated reports are distinguished between **verifiable and non-verifiable circumstantiated reports**, depending on whether or not it is possible, on the basis of the available investigative tools, to carry out checks to ascertain the veracity of the report and to proceed to the investigation phase.

The Whistleblower shall state the facts in a precise and concordant manner indicating:

- the main parties or actors involved;
- the place and date (or alternatively the time frame) when the events occurred;
- the reason why the conduct is deemed unlawful.

In the "Description of Facts" section, the facts must be set out in a precise and concordant manner. It is also possible to attach any documents useful for reporting, by clicking on '**FILE**'.

**Note** The Whistleblower is requested to pay specific attention to the choice of documents to be attached to the report. In particular, all attached documents must be relevant, adequate and not excessive in relation to the facts to be represented.

In addition, it is possible for the Whistleblower to issue a **voice (or verbal) report**. Unlike the written report, there are no mandatory fields to be filled out within the report; however, it is possible to record the voice message directly from the system through a specific function.

An explanation screen on how to activate the function from the different electronic tools will be displayed first.

**1** **2**

### Preliminary Information

The channel for oral reports provides for the recording of the report directly from the system.  
To be able to activate the recording it is necessary to **remember to authorize the use of the audio systems (microphone, headphones) from the browser used.**  
If you are registering from a mobile (mobile phone) you need to change the settings of the application/browser used directly from the "Settings" menu.  
The recording will be made available for preview listening and, before sending, a **voice camouflage mechanism** will be activated, in order to make the vocal timbre unrecognizable.  
Please **spell words clearly** and speak in an audible tone. **Incomprehensible reports may be discarded.**

BACK CONTINUE

After that, the report collection screen is displayed.

### Record the report

To enable fact-finding activities to be carried out effectively, the following shall be clear:

1. the Group companies to which the reported facts refer;
2. the circumstances of time and place in which the fact covered by the report occurred;
3. the description of the fact;
4. the full name or other elements that allow to identify the person to whom the reported facts are to be attributed

To use voice recording you need to allow the use of the microphone from your browser.

\* Record the report  
The maximum time limit for voice recording is 10 minutes.

START RECORDING STOP RECORDING

0:00 / 0:00

If you enter your personal data, these will be treated in accordance with the privacy policy.  
It is also specified that following the reporting and indication of personal data, the Company protects the reporting party. The discriminatory or retaliation acts adopted by the Company are null and void. In particular, the retaliation or discriminatory dismissal of the reporting party is null and the change of duties pursuant to Article 2103 of the Italian Civil Code is also void, as well as any other retaliation or discriminatory measure taken against the reporting officer.  
[Privacy policy](#)

I have read and agree to the Privacy Policy\*

I have read and agree to the Privacy Policy

Fields marked with \* are mandatory

BACK CONTINUE

After enabling the use of the microphone from the browser, as suggested in the screenshot above, simply click on the 'Start recording' button to start recording the voice message. During the recording, the time remaining for the Whistleblower to complete the report will be displayed.

When completed, it will be possible to listen to the recording again via the play button on the bar below the record button.

A voice camouflage filter will be applied to the recording when sending the report.

However, it should be borne in mind that disciplinary sanctions may be applied to anyone who makes a report that proves to be unfounded, on the basis of objective elements proving the wilful misconduct or serious misconduct of the person making the report, or in any case created for the purpose of harming or prejudicing the person reported.

The '**CONTINUE**' button allows access to the next step.

## Step 5 - Sending of reports:

**Final information and sending notification**

Have you already reported the facts to other authorities and / or internal parties and / or external to the company?  NO  YES

Do you want to send your contacts to the Supervisory Board?  NO  YES

Write here to whom you reported facts (max 4000 char)

Enter your contacts here, if necessary

If you enter your personal data, these will be treated in accordance with the privacy policy. It is also specified that following the reporting and indication of personal data, the Company protects the reporting party. The discriminatory or retaliation acts adopted by the Company are null and void. In particular, the retaliation or discriminatory dismissal of the reporting party is null and the change of duties pursuant to Article 2103 of the Italian Civil Code is also void, as well as any other retaliation or discriminatory measure taken against the reporting officer.  
[Privacy policy](#)

I have read and agree to the Privacy Policy\*

I have read and agree to the Privacy Policy

Fields marked with \* are mandatory

Through this step, the Whistleblower will specify whether he/she has already reported the facts to other authorities and/or persons inside and/or outside the Company, possibly indicating their name, and will provide his/her personal data to the Supervisory Board. If the Whistleblower wishes to remain anonymous, he/she must answer **(NO)** to the second question.

**Note** For the purpose of prosecuting the offences provided for in the Decree, Addressees are urged to transmit personal data so that there can be a closer comparison and cooperation between the Whistleblower and the Supervisory Board. It should be noted that the report will be handled in complete confidentiality in accordance with the regulations.



Selecting the '**CONTINUE**' button takes you to the next step.

## Step 6 – Report summary

**Data Preview**

To which company or entity does the report refer?  
test

Country in which the alleged violation occurred  
Italy

Which area of the company does the report refer to?  
Other (specify - free field)

if the item is not present, indicate here (max 4000 char)  
test

Indicate if the reported party belongs to the Internal Audit function or if the subject has a potential interest related to the report, such as to compromise the impartiality and independence of judgment.  
NO

Who are the main parties or subjects involved?  
test

Place and date / time frame in which the events in question occurred  
test

Attach any documents useful for reporting (remove metadata from your documents before attaching them)  
Specify (max 4000 char)  
test

The conduct is illegal because:  
other (specify)

Facts description  
test

Have you already reported the facts to other authorities and / or internal parties and / or external to the company?  
NO

Do you want to send your contacts to the Supervisory Board?  
NO

Write here to whom you reported facts (max 4000 char)

Privacy policy  
I have read and agree to the Privacy Policy  
I have read and agree to the Privacy Policy

BACK SEND

In this step, a summary of the report will be displayed, showing the data collected in the previously completed sections. You can proceed with the submission by selecting the '**SEND**' button, or modify the data entered by selecting the '**BACK**' button.

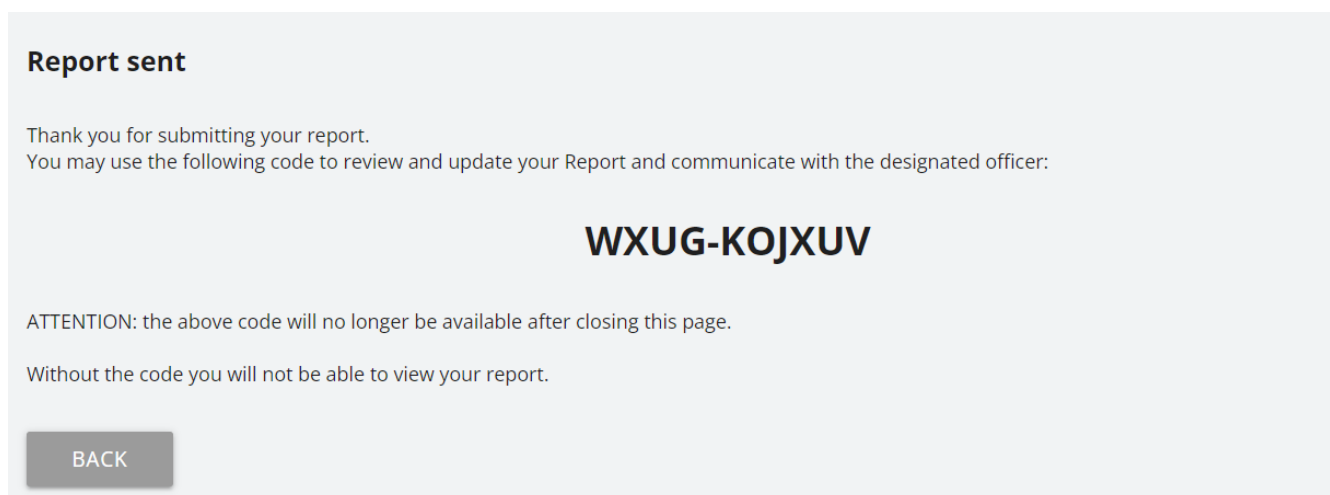
**NOTE** By clicking on the '**SEND REPORT**' button, the report will be forwarded to the Supervisory Board and it will no longer be possible to change the data entered or cancel the sending of the report.

## Step 7 - Confirmation of successful submission:

Once the report has been submitted, a confirmation page appears which will provide a 10-letter identification code to continue to consult your report in the future.

**NOTE** It will be the responsibility of the reporter to save and retain the code generated by the system in order to be able to re-enter the application at a later stage and check the status of the report (e.g. whether it has been taken into account, whether a preliminary investigation has been launched, whether there are any messages from the Supervisory Board in the system, whether it has been archived, etc.)

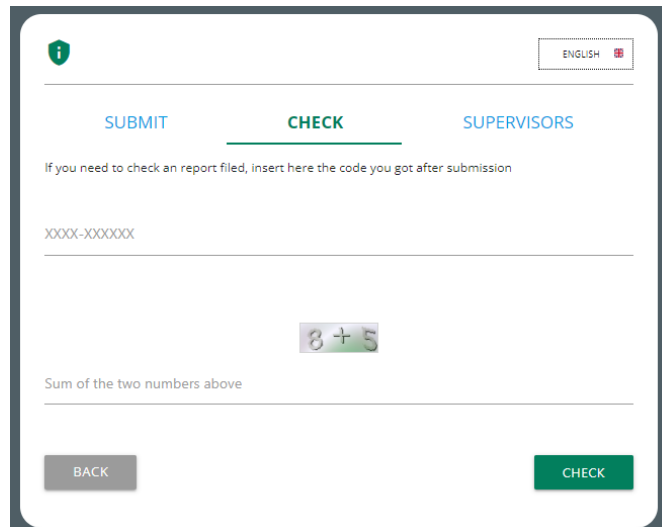
Below is an example of the screenshot:



**NOTE** The code provided cannot be displayed at a later date. Consequently, the loss of the provided code will prevent further communications between the Whistleblower and the Supervisory Board, making the Whistleblower definitively prevented to verify the status of the submitted report as indicated in the following Step 8 “*Consult a report*” and/or send and receive messages/communications/requests as indicated in the following Step 9 “*User Messaging*”.

## Step 8 - Consult a report:

If you wish to check the status of your submitted report, you can consult it by returning to the login page and clicking on the '**CHECK**' section



The screenshot shows a web interface for checking a report. At the top right, there is a language selector set to 'ENGLISH'. Below this, there are three tabs: 'SUBMIT', 'CHECK' (which is selected and underlined), and 'SUPERVISORS'. A message reads: 'If you need to check an report filed, insert here the code you got after submission'. Below this is a text input field containing 'XXXX-XXXXXX'. In the center, there is a security check image showing the equation  $3 + 5$ . Below the image, the text says 'Sum of the two numbers above'. At the bottom, there are two buttons: a grey 'BACK' button on the left and a green 'CHECK' button on the right.

Enter the code received in step 7 that was indicated on the confirmation page when the report was sent.

Also complete the required security check.

Select the '**CHECK**' button.

This section provides a summary of the report submitted

> Closed

### Whistleblowing Report: WB\_TNX\_1

ID: 91001  
Submit date time: 7/10/2023 11:46:17 AM

Step	DATE AND TIME	
1	Report Sent	7/10/2023 11:46:17 AM <span>SHOW</span>
2	Taking charge	7/10/2023 12:03:32 PM <span>SHOW</span>
3	Under processing	7/10/2023 12:04:56 PM <span>SHOW</span>
4	Under processing (Report evaluation)	7/10/2023 12:07:23 PM <span>SHOW</span>
5	Conclusion (Communicate results)	7/10/2023 12:08:09 PM <span>SHOW</span>

**Messages with whistleblower :**

la segnalazione è corretta - Sent by : Whistleblower - 7/10/2023 11:52:50 AM

BACK

You can consult the questionnaire and the processing answers given in the previous steps by clicking on the respective **'SHOW'** button.

Here instead is an example of the data display window, after clicking on the **'SHOW'** button.

#### Report Sent

**To which company or entity does the report refer?**  
asdf

**Country in which the alleged violation occurred**  
Italy

**Which area of the company does the report refer to?**  
Risorse Umane

**If the item is not present, indicate here (max 4000 char)**  
-

**Indicate if the reported party belongs to the Internal Audit function or if the subject has a potential interest related to the report, such as to compromise the impartiality and independence of judgment.**  
SI

**Who are the main parties or subjects involved?**  
asd

**Place and date / time frame in which the events in question occurred**  
dsaf

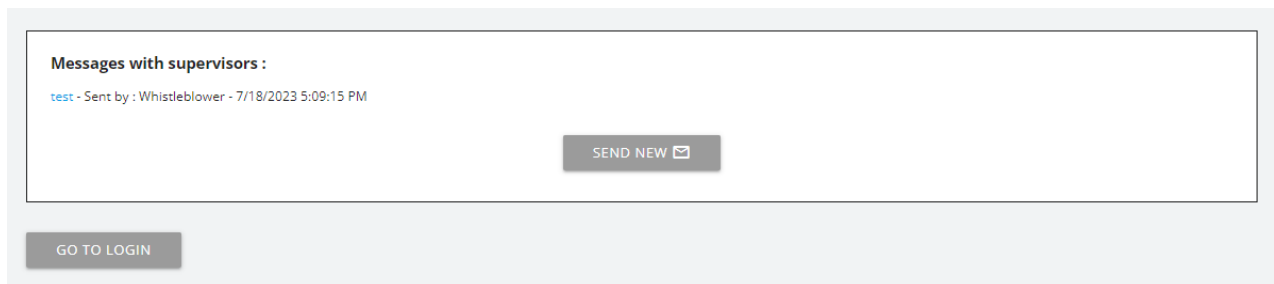
**The conduct is illegal because:**

## Step 9 - User Messaging:

With the **'MESSAGES'** function, it is possible to view all communications provided in support of the report.

Additional messages can be forwarded to the SB by selecting **'SEND NEW MESSAGE'**.

Sending messages will only be disabled when the message shifts to the '**Finalised**' step.

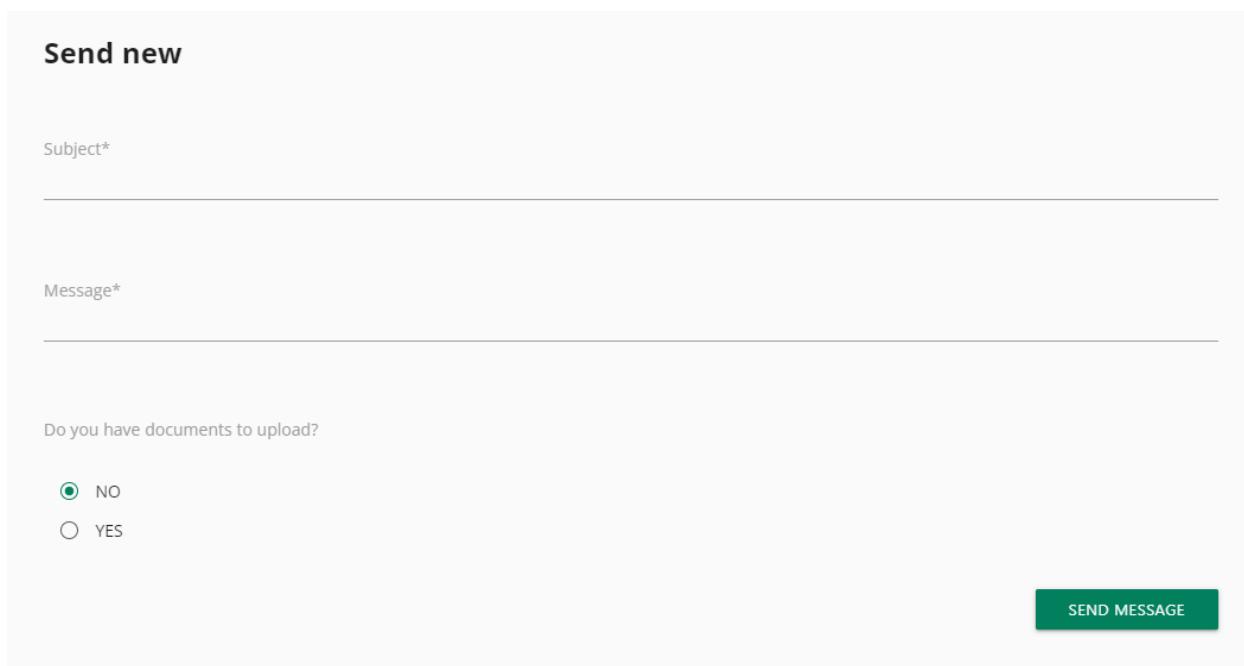


Messages with supervisors :

test - Sent by : Whistleblower - 7/18/2023 5:09:15 PM

SEND NEW ✉

GO TO LOGIN



Send new

Subject\*

Message\*

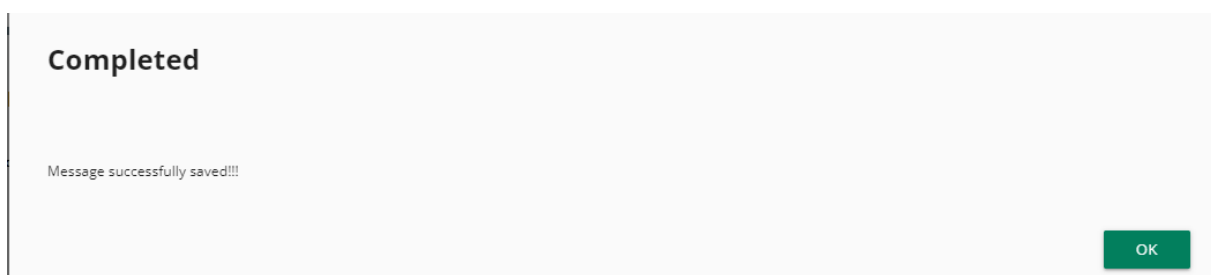
Do you have documents to upload?

NO

YES

SEND MESSAGE

It is possible to include attachments in the message.



Completed

Message successfully saved!!!

OK

Message saved with attachment

NOTE: Pursuant to the Article 12 (2) of the Italian Legislative Decree no. 24/2023, the identity of the Whistleblower (and/or every information from which it could be possible deducing, direct or indirectly, the identity of the Whistleblower) cannot be disclosed to parties other than those competent to receive the report.

The Supervisory Board, using this function “*User Messaging*”, will request the express consent of the Whistleblower in the case in which it is necessary to disclose her/his identity, pursuant to Article 12(5) and (6) of Italian Legislative Decree no. 24/2023, in order to allow the defence of the person accused/reported and/or of another person involved in a disciplinary procedure if the knowledge of the identity of the Whistleblower is indispensable for the defence of the person reported and/or involved.

The consent to such disclosure of the identity may be given by the Whistleblower exclusively through this function “*User Messaging*” (and/or any attachments contained therein). If the consent is not given by the Whistleblower, the identity of the Whistleblower will not be disclosed for the reasons indicated.