

WHISTLEBLOWING REPORTS

Pursuant to Legislative Decree No. 24 of 10 March 2023, Gnutti Cirillo S.p.A. has, since 15 July 2023, established the required channels for receiving and managing the so-called “whistleblowing” reports

WHO CAN REPORT?

- The shareholders and individuals with administrative, managerial, supervisory, oversight, or representative roles, even if such roles are exercised on a de facto basis, at Gnutti Cirillo S.p.A.;
- employees, trainees, self-employed workers, freelancers and consultants working for Gnutti Cirillo S.p.A.;
- persons who have held the above-mentioned roles in the past, if information on breaches was acquired during the relationship, and persons with whom the relationship has not yet started - e.g. candidates for personnel selection or employees during the probationary period.

AREAS OF POTENTIAL REPORTING

The list is very articulated and complex but can be related to **crimes or offences against the person, the company or the environment (by way of example but not limited to: corruption, discrimination and harassment in the workplace, violation of human rights, violation of laws and criminal offences, misuse of data, ...)**. For completeness, see Legislative Decree 24/2023¹.

Reports are **excluded** if: related to a personal interest of the reporting person, exclusively concerning their individual employment relationships, or concerning their employment relationships with hierarchically superior figures; regarding violations already mandatorily regulated by European Union or national acts, or by national acts implementing European Union acts.

REPORTING CHANNELS



toll-free number: **800 – 911 – 892**

Calls are recorded



e-mail address: gnutticirillo@gestore-segnalazioni.it

➡ The reporting party also has the right to request a face-to-face meeting, using the aforementioned channels, with a professional external to the company, to whom they can confide the report in a confidential conversation.

¹In general, potentially reportable are violations of European Union regulations that harm the public interest or the integrity of the Company, of which the reporting party becomes aware in the work context, consisting of: unlawful conduct relevant under Legislative Decree 231 or violations of Model 231, and offenses falling within the scope of application of European Union or national acts, as well as national acts implementing European Union acts, in the following fields: public procurement; services, products, and financial markets, prevention of money laundering and financing of terrorism; product safety and compliance; transportation safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data and security of networks and information systems; acts or omissions harming the financial interests of the European Union under Article 325 of the Treaty on the Functioning of the European Union; acts or omissions concerning the internal market, under Article 26, paragraph 2, TFEU (including violations in competition law, State aid, and corporate tax matters); acts or behaviours that, although not constituting an offense, undermine the purpose or objective of the provisions of the Union acts in the aforementioned sectors.

Also subject to possible reporting are unlawful conducts relevant under Legislative Decree 231/2001 or violations of the Model 231 adopted by the Company.