

## LA CISA TRASPORTI INDUSTRIALI S.R.L. REPORTING CHANNEL WHISTLEBLOWING

### WHO CAN MAKE A REPORT?

Eligible to report violations of which they have become aware within their work context are persons acting in the capacity of:

- **employees**, under any type of contract;
- **self-employed** workers;
- **collaborators, freelancers and consultants**;
- **volunteers and trainees**, including unpaid ones;
- **shareholders** (natural persons);
- persons with functions, including de facto, of **administration, management, control, supervision or representation**.

In general, all stakeholders of the Company.

### WHEN CAN YOU REPORTED?

The report can be made when:

- **The legal relationship is ongoing;**
- **when the legal relationship has not yet begun**, in the event that the reporting party became aware of a violation during the selection process or in other pre-contractual phases;
- **during the probationary period;**
- **after the termination of the legal relationship**, in the event that the reporting party became aware of the violation before the termination of the relationship itself (e.g. pensioners).

### WHAT CAN YOU REPORTED?

Conduct, acts or omissions, which may consist of the following, may be reported through this reporting channel:

- **offenses committed in violation of European Union legislation related to certain areas** (including public procurement; product safety and compliance; environmental protection; public health; consumer protection; personal data protection; and network and information system security);
- **acts or omissions detrimental to the financial interests of the European Union, as well as impairing the free movement of goods, persons, services and capital** (for example: competition and state aid violations);
- **Crimes** covered by Italian Legislative Decree 231/01;
- **violations of the Organizational Model** adopted by the Company pursuant to Italian Legislative Decree 231/01.

The report may also concern information on conduct aimed at concealing the above violations, as well as violations **not yet committed** that the reporter reasonably believes may occur on the basis of concrete evidence.

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### WHAT CANNOT BE REPORTED?

The following cannot be reported:

- **Disputes, claims or requests linked to a personal interest** of the reporting person which relate exclusively to their individual working relationships with colleagues or superiors;
- **violations** where already regulated in the directives and regulations of the European Union and in the implementing provisions of the Italian law **which already guarantee specific reporting procedures**;
- **violations relating to national security**, as well as **procurement relating to aspects of defense or national security**, unless such aspects fall under relevant secondary legislation of the European Union;
- **news clearly without foundation**;
- **information that is already totally in the public domain**;
- information acquired only on the basis of unreliable rumors or rumors (**so-called rumours**).

### HOW TO MAKE A REPORT?

**La Cisa Trasporti Industriali S.r.l.** in compliance with the legislative dictates, has implemented its own internal reporting channel, making an IT platform available to the Recipients that meets the requirements of Legislative Decree 24/23 and accessible at the following link:

<https://lacisa.whistlelink.com/>

as well as from the page dedicated to "Whistleblowing" on the Company's website:

<https://www.lacisa.com>.

Through the Platform it is possible to make a **written report**, through the guided compilation of a Report Form, or through a **voice recording** lasting a maximum of 10 minutes.

In both methods it is possible **to attach documents to support the Report** and request a confidential meeting with the internal Reports Manager.

The Reports must, in any case, be **detailed and well-founded**.

Through a Unique Identification Code and a password, automatically generated by the Platform and which cannot be recovered or duplicated in any way, it will be possible for the Reporter to monitor the processing status of their **report and possibly communicate** with the Report Manager.

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### WHAT GUARANTEES DOES CISA TRASPORTI INDUSTRIALI S.R.L. GUARANTEE TO THE REPORTER?

In compliance with the provisions of the law, La Cisa Trasporti Industriali S.r.l. guarantees the **confidentiality** of the identity of the reporter, of the people reported or otherwise involved in the report, as well as the content of the report and the related documentation.

The Company guarantees **protection** and prohibits and sanctions any direct or indirect form of retaliatory or discriminatory measures and behavior adopted against the Reporter as a result of the report, including omissions, even attempted or threatened ones.

**Support** measures are also envisaged by third sector bodies included in a specific list published by ANAC.

The protections provided by the Decree **also apply to people other than the whistleblower** who could still be the recipients of retaliation, due to their role assumed in the context of the reporting and/or the particular relationship that binds them to the whistleblower. Among these are:

- the so-called "**facilitators**", i.e. those who supported the whistleblower in their reporting;
- **work colleagues** and people from the same work context as the reporter;
- **relatives or stable relatives** of the reporting person;
- **entities owned** by the reporting party or that operate in the same working context as the reporting party.

### HOW IS THE REPORT MANAGED?

The management of the internal reporting channel and the reporting itself was entrusted by La Cisa Trasporti Industriali S.r.l. to an internal Manager, independent of the Company and specifically trained in the management of reports, who will manage the Report according to the procedure adopted by the Company itself.

In particular, the Internal Manager will diligently follow up on the reports received, verifying their content and carrying out an internal investigative activity in order to verify their existence and allow the adoption of measures aimed at preventing or sanctioning the irregularities or offenses identified.

The Reporter will be **informed** of receipt of the report and of the results of the investigations carried out.

More specifically, the Internal Reporting Channel Manager:

- **will issue to the Reporting Party** notice of receipt of the report within seven days from the date of receipt;
- **will maintain discussions with the Reporter**, also requesting any additions regarding the subject of the report;
- **will provide feedback to the Reporting Party within three months** from the date of the acknowledgment of receipt or, in the absence of such notice, within three months from the expiry of the seven-day period from the submission of the report.

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### WHAT OTHER REPORTING CHANNELS ARE AVAILABLE TO THE REPORTER?

#### IL CANALE ESTERNO DI ANAC

An external reporting channel is active at the National Anti-Corruption Authority (**ANAC**), such as to guarantee, also through encryption tools, the confidentiality of the identity of the reporter, of the people reported or otherwise involved in the report, as well as of the content of the report and of the relevant documentation.

The reports will be **managed by ANAC** according to the procedure adopted by the body itself.

#### The reporting party can make an external report only if, at the time of submission:

- The internal reporting channel, although mandatory, is not active or, even if activated, does not comply with the provisions of the Decree;
- the reporting party has already made an internal report and it has not been followed up by the designated person or office;
- the reporter has reasonable grounds to believe that, if he were to make an internal report, it would not be followed up effectively or that it could lead to the risk of retaliation;
- the reporting party has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

#### PUBLIC DISCLOSURE

It is possible to make public information on violations of which you become aware in your work context, **through the press** or in any case through means of dissemination capable of reaching an unlimited number of people (**including social networks**).

The whistleblower, however, is protected only if, at the time of disclosure, one of the following **conditions** exists:

- the reporting party previously made an **internal and external report** to ANAC, which remained unanswered within the deadlines set for processing the reports (3 or 6 months);
- The whistleblower has well-founded and reasonable grounds to believe that the **violation may represent an imminent** or obvious danger to the public interest, or that any external reporting may entail the risk of retaliation or may not have an effective follow-up.

#### THE COMPLAINT TO THE JURISDICTIONAL AUTHORITY

The whistleblower still has the right to evaluate filing a complaint with the jurisdictional authority if he or she becomes aware of illegal conduct in his or her work context.

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### LOSS OF PROTECTIONS AND RESPONSIBILITIES OF THE REPORTER.

At the time of reporting, the reporting party must have reasonable grounds to believe that the information reported is true.

The protections provided for by Legislative Decree 24/23, in fact, do not apply when the penal or civil liability of the reporting person for crimes of defamation or slander is ascertained, or in any case for the same crimes committed with the report to the judicial authority or accountant, committed with intent or gross negligence.

In the event of loss of protection, in addition to the application of disciplinary sanctions, an administrative fine of 500 to 2,500 Euros is also imposed by ANAC.

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Società soggetta ad attività di direzione e coordinamento di Hydra Immobiliare Finanziaria s.r.l.

