

# WHISTLEBLOWER POLICY

## COLORZENITH CONTACTS for "WHISTLEBLOWING" procedure

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## 1. Purpose and scope of application

This Whistleblower policy (the "Policy") is adopted by COLORZENITH Srl (the "Company"), in compliance with European legislation on whistleblowing and related national transposing legislation ("whistleblowing legislation"), which requires the entities concerned to provide clear and easily accessible information on internal and external whistleblowing procedures.

It is designed to facilitate and encourage the reporting of violations or unlawful practices (illegal or improper conduct) of public relevance within the organization.

We are committed to ensuring that all reports are handled with the utmost diligence and that the individual ("whistleblower") making a report receives adequate protection.

The Company, through the **ADMINISTRATIVE DEPARTMENT**, processes every whistleblowing report received fairly and with care, in a totally confidential manner, ensuring an adequate level of protection and security for the whistleblower.

The whistleblowing regulations and this Policy apply to all members of the Company's staff, regardless of their legal or contractual status (e.g., employees, self-employed, shareholders, managers, executives, and interns), who have obtained information about violations in the employment context, including during the selection process, trial period, and following the termination of the employment contract.

The same safeguards provided for whistleblowers also protect, among others, the facilitators, those who belong to the same work environment and are related to the whistleblower and who may suffer retaliation, such as colleagues or family members of the whistleblower and entities owned by the whistleblower.

## 2. What can be reported

Do not hesitate to report any violations, unlawful practices, unlawful or improper conduct, and any other conduct or events of which you have become aware in the work context, which could threaten or harm the public interest ("violation information").

Matters covered by whistleblowing legislation include, but are not limited to, violations related to privacy and data protection, consumer protection, violations of company policies and procedures, financial malfeasance, money laundering, harassment or discrimination, safety risks, and environmental issues. It does not, however, include, by

way of example, whistleblowing reports relating to personal and individual interests or to violations already covered by other European or national legislation.

The list is for informational purposes only, and if you have any doubts, do not hesitate to contact the **ADMINISTRATIVE DEPARTMENT** or refer to a trusted person who can assist you in the reporting process and whose assistance will remain confidential ("facilitator").

### **3. How to make a whistleblowing report**

Reports can be submitted through the internal or external channels described below.

In preparing and submitting a whistleblowing report, you may be assisted by a facilitator, who will benefit from the same protections afforded to whistleblowers.

#### **A) Internal whistleblowing channel**

Internal whistleblowing channels are designed, established, and operated in a secure manner, ensure the confidentiality of the identity of the whistleblower and any other person named in the report, and prevent access by unauthorized personnel.

You can submit a whistleblowing report **in writing, orally, or in person.**

A report is generally considered admissible when it clearly shows the circumstances of place and time when the events occurred, the identity of the person responsible for the violation, and any other information useful for proper assessment.

**If your whistleblowing report does not fall within the objective or subjective scope of whistleblowing legislation** or is inadmissible, **you will be duly informed and, as appropriate, we will either simply close the report** or process it in accordance with ordinary reporting procedures. In either case, the protective measures recognized by whistleblowing legislation will not apply.

#### **I) In writing**

To send a whistleblowing report, complete the Whistleblower Form shown here

<https://www.iubenda.com/whistleblowing-form/it/729698e8-39bf-4bd9-ac84-2c0ebc4b6629>

You may decide to proceed with a:

- **"CONFIDENTIAL WHISTLEBLOWING REPORT"**: you will be asked to provide your name and contact information. This information will remain **CONFIDENTIAL** and accessible only to the **ADMINISTRATIVE DEPARTMENT** responsible for receiving and following up on reports; or
- **"ANONYMOUS WHISTLEBLOWING REPORT"**: you will not be asked to send your contact details and your identity will remain confidential. **NOTE: ANONYMOUS WHISTLEBLOWING REPORTS MAY BE PROCESSED DIFFERENTLY DEPENDING ON THE APPLICABLE NATIONAL WHISTLEBLOWING LEGISLATION**

#### **II) Orally**

You can submit a whistleblowing report by phone or through other voice messaging systems. Contact the Company's **ADMINISTRATIVE DEPARTMENT** using the contact information provided at the top of the Policy.

#### **III) In person**

You may request to file a report in person by scheduling an appointment with any member of the **ADMINISTRATIVE DEPARTMENT**. Contact the Company's **ADMINISTRATIVE DEPARTMENT** using the contact information provided at the top of the Policy.

Please be advised that, depending on the circumstances, anonymity may not always be guaranteed in the case of oral or in-person reports. Confidentiality will, on the other hand, always be ensured.

## **B) External whistleblowing channels**

In processing reports, the relevant **ADMINISTRATIVE DEPARTMENT** is required to ensure the protective measures are provided set forth in the whistleblowing legislation, to process each report received fairly and with care, and to respect the obligation of confidentiality, ensuring an adequate level of protection and security for the whistleblower.

However, if you have filed a whistleblowing report without having received any feedback or you believe that reporting internally may cause you unfair disadvantage or that your report may not be processed effectively, you may make use of the external whistleblowing channels made available by the relevant authorities.

You may also make use of external whistleblowing channels when there is a conflict of interest situation that cannot be resolved internally. A conflict of interest occurs, for example, when the relevant person is the author or subject of a report (whistleblower/person concerned).

You should only proceed with external whistleblowing if internal whistleblowing is not a viable solution.

For more information on external whistleblowing channels and how to make a report click here <https://www.anticorruzione.it/-/whistleblowing>

## **4. Protection measures**

Protection measures are afforded to any person whose whistleblowing report falls within the scope of whistleblowing legislation and who, at the time of the report, had reasonable grounds to believe that the information about the violations was true.

These measures include.:

- **no retaliation:** this includes any form of retaliation, including threats and attempts to retaliate. Examples of retaliation include suspension, dismissal or equivalent measures, demotion of rank or non-promotion, change of duties, change of work location, reduction of salary, change of working hours, discrimination, disadvantageous or unfair treatment, and other adverse job consequences;
- **confidentiality obligation:** the confidentiality will be ensured of the identity of the whistleblower and of any other person mentioned in the report and related documentation, as well as of any information from which the identity of the whistleblower or third party may be directly or indirectly inferred;
- **legal support and protection measures:** whistleblowers are provided with stringent legal protections, including, among other things, access to comprehensive and independent information and advice, effective assistance from competent authorities, legal assistance in cross-border criminal and civil proceedings, exclusion of liability for acquiring or accessing reported or publicly disclosed information, and reversal of the burden of proof.

The facilitators involved in the whistleblowing process enjoy the same protection measures provided to the whistleblower.

## ***5. How whistleblowing reports are processed***

Reports are always received and processed by the **ADMINISTRATIVE DEPARTMENT** in strict compliance with the obligation of confidentiality. The **ADMINISTRATIVE DEPARTMENT** will carry out its duties impartially and will keep all information you decide to report confidential.

Should your report be received by anyone other than the **ADMINISTRATIVE DEPARTMENT**, it will be forwarded within seven (7) days to the **ADMINISTRATIVE DEPARTMENT** and you will be duly informed. It is important that each report be clearly identified as a whistleblowing report, to avoid it being processed as if it were an ordinary report. The appropriate forms should be used and the correct procedures followed to avoid confusion.

Should a conflict of interest as described above arise, you may avail yourself of the external whistleblowing channels by following the instructions provided in this Policy.

The **ADMINISTRATIVE DEPARTMENT** will assess whether the report is admissible and substantiated, whether further information needs to be acquired, and, if appropriate, will proceed with further investigation.

Your identity, that of any other person named in the report and related documentation, as well as any information from which your identity or that of a third party may be directly or indirectly inferred, will be kept confidential.

In some cases, however, the Company may be obliged to inform the persons concerned of the allegations made against them. The foregoing is a legal obligation in all those cases where it can be objectively determined that disclosure of the information is unlikely to have any adverse effect on investigations conducted in the context of whistleblowing legislation.

In other cases, by virtue of specific technical or professional expertise, we may need to involve additional internal or external parties in order to better manage and follow up on your report or carry out necessary investigative or fact-finding activities. In such cases, your identity will be kept confidential and we will not share any information from which it can be inferred. The same applies to the identity of any other person involved or named in the whistleblowing report.

The Company is committed to maintaining the confidentiality of your identity, as well as information from which it may be directly or indirectly inferred, to the extent permitted by law.

## ***6. Notice of receipt and feedback***

A notice of receipt will be sent to you within 7 (seven) days of receipt of your whistleblowing report. Please note that, depending on applicable regulations, you may receive the notice within 7 (seven) business days.

During the processing of the report, if possible (this, for example, does not apply in the case of an anonymous report), the **ADMINISTRATIVE DEPARTMENT** will inform you of the progress and actions taken.

You will receive feedback on your report within a period of 3 (three) months at the most.

## ***7. Sanctions***

The submission of whistleblowing reports that are intentionally false, or whose falsity is due to gross negligence on the part of the whistleblower, could result in the imposition of sanctions under the whistleblowing legislation.

## ***8. Policy Revision***

This policy will be periodically checked and updated to ensure it is always in line with legal requirements.

## ***9. Whistleblowing-related data processing***

More information on data processing activities carried out in connection with the use of the Whistleblower Form is available here <https://www.colorzenith.it/privacy-e-cookie-policy/>.

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