

AZIMUT | BENETTI  
GROUP

*Whistleblowing - The internal reporting procedure*



# WHAT IS WHISTLEBLOWING?

It is a tool through which employees (and others) of a company report to specific individuals or bodies a violation, an offence or a wrongdoing, committed by other subjects within the organisation.

It has been present in Italy since 2017, but the **new legislation** (Legislative Decree 24/2023) **expands** the protections afforded to whistleblowers.

## WHO CAN MAKE A REPORT?

- ✓ **employees** (also in probationary period);
  - ✓ **self-employed** workers and **collaborators**;
  - ✓ employees or collaborators of Azimut|Benetti's **suppliers**;
  - ✓ **freelancers** and **consultants** working for Azimut|Benetti;
  - ✓ **volunteers** and paid and unpaid **trainees** working for Azimut|Benetti;
  - ✓ **shareholders** and persons with functions of **administration, management, control, supervision** or **representation** for Azimut|Benetti;
  - ✓ **candidates** and **potential** suppliers.
- N.B.: The report may also be made after termination of the relationship with Azimut|Benetti.

# WHAT VIOLATIONS CAN BE REPORTED?

Any criminal, civil, administrative or accounting wrongdoing

Violations of Model 231 and the Ethics Code



That harm the public interest or the interest of Azimut|Benetti and of which you have become aware in the context of your work.

**Provided that**  the violation is not related to a personal interest that relates exclusively to your relationship with Azimut|Benetti.

## USING THE MY GOVERNANCE PLATFORM



- ✓ Click on <https://www.mygovernance.it/token-azimut/>, **register** and **fill in the required fields**. If you wish, you can also **attach** files useful for reporting;
- ✓ For more precise operating instructions on how to make a report, **the My Governance vademecum is available in the dedicated section of the company intranet, as well as on the Azimut Benetti S.p.A. website;**
- ✓ The report shall be sent **to the Supervisory Body ("SB")** of Azimut|Benetti, which is the subject in charge of handling reports.

# WHAT SHOULD THE CONTENT OF THE REPORT BE?

THE CONTENT OF THE REPORT IS FREE, BUT IT IS IMPORTANT THAT AS MANY ELEMENTS AS POSSIBLE ARE COMMUNICATED, IN ORDER TO FACILITATE INTERNAL INVESTIGATIONS

The report can be done:


- ✓ in writing, including a description of the facts;
- ✓ or orally (as of August 2023);
- ✓ It is also possible to request a face-to-face meeting with the reporting manager (by indicating this on the screen where the description of the facts is requested), to be scheduled **within 7 days of the** reporter's request.

## WHAT HAPPENS AFTER THE REPORT IS SUBMITTED?

If the report has been entered correctly, you will immediately receive a submission confirmation from the platform;



Within 7 working days, you will receive confirmation from the Supervisory Body that the report has been taken into account;



You will receive feedback within 3 months after the report has been received.

→ In the course of the procedure, you may be asked for additional information by the Supervisory Body.

Your identity will remain CONFIDENTIAL and your data will only and exclusively be accessible to the members of the Supervisory Body in charge of the investigation.



Remember to use only this platform (and not to use the e-mail box or other tools) for all reporting-related communications.



- ✓ Your personal data will be processed in accordance with the **privacy regulations in force**, as set out in the privacy policy on the platform.
- ✓ The documents and data relating to the report will be kept for as long as is strictly necessary for the processing of the report (in any case no longer than **5 years** from the communication of the final outcome of the procedure).

# WHAT PROTECTIVE MEASURES AM I ENTITLED TO IF I MAKE A REPORT?

## CONFIDENTIALITY

Your identity will not be revealed as part of the internal procedure.

## PROTECTION FROM POSSIBLE RETALIATORY ACTS BY YOUR EMPLOYER

Because of your report, your employer may not, for example, dismiss you, demote you or apply any unfavourable treatment to you.

However, your identity may be revealed:

- ✓ if you give your consent or disclose it yourself;
- ✓ in the context of legal proceedings.

## DO THE PROTECTIVE MEASURES ONLY APPLY TO THE REPORTER?

No, they also apply to:

- ✓ to FACILITATORS, i.e. colleagues who assist you in the reporting process;
- ✓ to your FAMILY MEMBERS working in the same work environment;
- ✓ to your COLLEAGUS with whom you have a regular and current relationship;
- ✓ to any ENTITIES YOU OWN OR FOR WHICH YOU WORK, as well as to entities operating in the same work context.

## WHAT HAPPENS IF MY REPORT IS FALSE?

Caution: reporting must be done in good faith and only if you have reasonable grounds to believe that the information about the violations is true.



If it is established that you have made a wilfully false report, you may be subject to a **DISCIPLINARY SANCTION** and be liable to be sued for libel or slander.

→ For this reason, it is very important that the report is done seriously and in good faith.

# EXTERNAL REPORTING (TO ANAC)

## In which cases?

Only if:

- a) You have already made the internal report, but **it has not been followed up**;  
or
- b) You have **good reason** to believe that:
  - ✓ internal reporting will not be effectively followed up;
  - ✓ there is a risk of retaliation;
  - ✓ the violation may constitute an imminent or obvious danger to the public interest.

## To whom?

To the Italian National Anti-Corruption Authority (A.N.A.C.) via the following link:

<https://servizi.anticorruzione.it/segnalazioni/#!/#%2F>

More information can be found on the following A.N.A.C. page by clicking on



## CAN THE REPORT BE MADE PUBLIC?

Beware, public disclosure of the violation (i.e. through the press, electronic media or other means of dissemination capable of reaching a large number of people) may prevent you from obtaining the protections provided by law.

Unless you fall into one of these cases:

- ✓ You reported internally and externally without any feedback;  
or
- ✓ You have good reason to believe that the violation may constitute an imminent or apparent danger to the public interest;  
or
- ✓ you have well-founded reasons to believe that external reporting may entail a risk of retaliation or may not be effectively followed up due to the specific circumstances of the case.



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*If in doubt, consult the complete procedure available on the website and in the dedicated section of the company intranet*