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**PROCEDURE FOR REPORTING UNLAWFUL  
CONDUCT *AND GOVERNING THE  
PROTECTION OF EMPLOYEES WHO  
REPORT UNLAWFUL CONDUCT  
(Whistleblowing)***

(rev.15.10.2024)

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## 1 Definitions

**Code of Ethics:** adopted pursuant to Decree 231/01, in this document the Company details all its rights, duties and responsibilities with respect to all those parties with which relations are maintained in pursuit of the corporate objects. The Code of Ethics seeks to establish ethical standards and rules of conduct that the Recipients of the Code must respect in their relations with the Company, in order to prevent and contain unlawful conduct.

**Collaborators:** persons who act in the name and/or on behalf of the Company under a mandate or other type of collaboration (for example, but without limitation: financial advisors, interns, contract and project workers, agency personnel).

**Consultants:** persons who work on behalf of the Company under a contractual relationship.

**G.D.P.R.:** General Data Protection Regulation (EU) 2016/679 on the protection of personal data.

**Decree 231/01 or Decree:** Decree 231 dated June 8, 2001, on the “Administrative responsibility of legal persons, companies and associations, even without legal personality” and subsequent amendments and additions.

**Decree 24/2023:** Decree 24 dated March 10, 2023, on implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on “the protection of persons who report breaches of Union law and containing instructions for the protection of persons who report breaches of national regulations”.

**Recipients of the Code of Ethics:** shareholders, members of corporate bodies, employees and all those that, although external to the Company, work directly or indirectly for GranitiFiandre or with GranitiFiandre (e.g. collaborators of any kind, consultants, suppliers, clients).

**Recipients of the Model:** members of corporate bodies, the auditing firm, employees and all those who, although not employees, work for GranitiFiandre and are subject to control and management by the Company (for example, but without limitation: financial advisors, interns, contract and project workers, agency personnel).

**Public disclosure:** disclose information about breaches to the public via the press or electronic means or, in any case, by means of dissemination capable of reaching a large number of people.

**Facilitator:** natural person who assists a reporting party during the reporting process, acting within the same working environment and whose assistance must be kept confidential.

**Report administrator:** dedicated independent internal person or office with personnel specifically trained to administer the reporting channel, or appointed independent external party with specifically trained personnel.

**Subordinated workers or employees:** all employees of the Company (first, second and third professional area personnel; responsible managers; executives).

**Law 146/2006:** Law 146 dated March 16, 2006 (Ratification and execution of the Convention and Protocols of the United Nations against transnational organized crime, adopted by the General Assembly on November 15, 2000, and May 31, 2001).

**Model / 231 Model:** Organization, Management and Control Model pursuant to arts. 6 and 7 of the Decree.

**SB:** Supervisory Body envisaged in arts. 6.1.b) and 7 of Decree 231/2001, tasked with supervising the functioning of and compliance with the Model and keeping it updated.

**Platform:** IT tool for the management of reports

**Involved party:** natural or legal person mentioned in the internal or external report, or in the public disclosure, as a party to which the breach is attributed or, in any case, a party somehow implicated in the breach reported or made public.

**Response:** communication of information to the reporting party about the follow-up actions taken or to be taken consequent to the report.

**Report:** written or verbal communication of information about the breach.

**Anonymous Report:** when the identification details of the reporting party are not specified and cannot otherwise be determined.

**Open Report:** when the reporting party raises a problem openly, without any confidentiality protections.

**Confidential Report:** when the identity of the reporting party is not specified.

**Bad Faith Report:** report made solely to damage or, in any case, cause harm to one or more reported parties. These are unfounded reports made with malice or gross negligence.

**Internal Report:** written or verbal communication of information about the breach, presented via an internal reporting channel.

**External Report:** written or verbal communication of information about the breach, presented via an external reporting channel.

**Company:** GranitiFiandre S.p.A.

**Reporting parties:** Recipients of the Code of Ethics and/or the Model, as well as all other parties that contact the Company in order to make a Report.

**Reported parties:** Recipients of the Code of Ethics and/or the Model that have allegedly committed actions, irregularities, infringements, censurable conduct and facts or, in any case, any practice inconsistent with the provisions of the Code of Ethics and/or the Model.

**Third parties:** contractual counterparts of GranitiFiandre, whether natural or legal persons (such as suppliers, consultants...), with which the Company establishes any form of collaboration governed by a contract, that cooperate with the Company in the context of at-risk activities.

**Subordinates:** persons subject to management and supervision by an exponent of the Company pursuant to art. 5.1.b) of the Decree.

**Supplier code of conduct:** document created in order to ensure that suppliers of a company adhere to high standards of safe working conditions, respectful and fair treatment of employees and ethical practices.

**Recipients of the code of conduct:** suppliers, contractors and subcontractors of the supply chain.

## 2 Purpose

The purpose of this procedure is to establish clear, identified information channels that guarantee the receipt, analysis and processing of reports - whether anonymous, open or confidential - about alleged unlawful conduct of significance in the following sectors/contexts:

- i. infringements of the 231 Model or the Code of Ethics, or unlawful conduct of the types specified in Decree 231/2001 and in the suppliers code of conduct;
- ii. administrative, accounting, civil or criminal offenses and breaches of EU regulations in a wide range of sectors expressly indicated in the annex to Directive (EU) 2019/1937 (including: public procurement, financial services, product and transport safety, environmental protection, food safety, public health, network security, competition).

In addition, this procedure is designed to:

- a) guarantee the confidentiality of the personal data of the reporting party and the alleged perpetrator of the infringement, without prejudice to the rules that govern investigations or proceedings initiated by the judiciary with regard to the reported facts or, in any case, the disciplinary proceedings initiated in the event of bad faith reports;
- b) protect adequately the reporting party against direct or indirect reprisals and/or discrimination for reasons linked "directly or indirectly" to the report;
- c) ensure a specific, independent and autonomous channel for the report.

## 3 Scope of application

The reporting system may be activated by the following parties:

- Shareholders;
- Members of the Board of Directors;
- Members of the Board of Statutory Auditors;
- Members of the Supervisory Body;
- Auditing Firm;
- Employees (regardless of contract type) whose work requires their inclusion within the organization of the Company, even if not party to a formal subordinate relationship;
- Collaborators, freelance professionals, consultants;
- Volunteers, apprentices;
- Third parties (e.g. suppliers, clients);
- Persons with management, administration and control functions

With a view to encouraging reports, even third parties - such as clients, suppliers and distributors - may make reports. This represents an optional expansion of the types of party indicated in Decree 24/2023.

The procedure also applies to reports of breaches received in the context of a working relationship that has

terminated in the meantime, as well as those whose working relationship has not yet commenced, if information about the reported breaches was received during the selection process or other pre-contractual phases.

#### **4 Responsibility and dissemination**

This procedure is an integral part of the Model and, accordingly, is approved by the Board of Directors of the Company that, acting on recommendations from the Supervisory Body, is also responsible for the related updates and additions.

It is accessible in "electronic format":

- on the Home Page of the corporate intranet
- on the website [www.granitifiandre.it](http://www.granitifiandre.it)

The above methods of dissemination are also adopted for any updates and additions to the procedure.

#### **5 Reference principles**

The persons involved in this procedure work in compliance with the established system of corporate regulations, organizational rules, powers and mandates, and are required to respect the relevant laws and regulations in force, as well as the principles set out below.

##### **KNOWLEDGE AND AWARENESS**

This reporting procedure is a key element in guaranteeing the full awareness required for the effective control of risks and their interrelations, and for guiding changes in the strategy and organization of the Company.

##### **GUARANTEED CONFIDENTIALITY FOR PERSONAL DATA AND PROTECTION FOR THE REPORTING AND REPORTED PARTIES**

All parties that receive, examine and assess reports, and all other parties involved in the management of reports, are required to guarantee maximum confidentiality for the facts reported and the identities of the reported party and the reporting party, who is protected appropriately from reprisals, discrimination and, in any case, unfair conduct. Reports cannot be used for purposes other than those necessary to respond adequately to them.

The identity of the reporting party and any other information from which, directly or indirectly, that identity could be discovered, cannot be revealed - without express consent from the reporting party - to anyone other than those competent to receive or follow-up reports, who have been expressly authorized to process such data.

The ban on revealing the identity of the whistleblower applies not only to the name of the reporting party, but also to all those elements of the report from which, even indirectly, the identity of the latter could be discovered.

##### **PROTECTIVE MEASURES AND BAN ON REPRISALS**

In order to protect the reporting party and encourage reports, the applicable regulations establish that such party cannot suffer any reprisals, establishing specific protective measures and limitations of liability.

If the reporting party demonstrates having suffered harm after making a report, a public disclosure or a complaint to the judicial or accounting authorities, it is presumed - unless proven otherwise - that the harm is a consequence of such report, public disclosure or complaint to the judicial or accounting authorities.

From that presumption, it follows in the case of a report that certain circumstances may be deemed to represent reprisals (e.g. termination, suspension or equivalent measures; demotion or denied promotion; change of duties, change of work place, salary reduction, change of working hours; suspension of training or any restrictions on access to training; demerit notes or adverse references, etc.).

Reporting parties may inform ANAC about any reprisals they believe having suffered. In the case of reprisals committed in a public sector working environment, ANAC notifies immediately the Department for public sector reform at the Prime Minister's Office, and any guarantee or disciplinary bodies, so they can adopt suitable measures to the extent of their responsibilities. In the case of reprisals committed in a private sector working environment, ANAC notifies immediately the National labor inspectorate for the adoption of suitable measures, to the extent of its responsibilities.

For a complete list of conduct deemed to represent reprisals, express reference is made to art. 17 of Decree 24/2023 "Protection of persons who report breaches - Whistleblowing"

## PROTECTION OF THE REPORTED PARTY FROM BAD FAITH REPORTS

All parties are required to respect the dignity, honor and reputation of each other. For this purpose, the reporting party must disclose any personal interest linked to the report. More generally, the Company guarantees adequate protection from bad faith reports, deprecating such conduct and emphasizing that reports made to damage or otherwise cause harm, as well as all other forms of abuse of this document, may give rise to penalties in disciplinary and other competent settings.

When a reporting party is found guilty, even in a first-level court ruling, of the offenses of defamation or slander or, in any case, guilty of committing such offenses in reports to the judicial or accounting authorities, or to have civil liability for the commitment of such offenses deliberately or with gross negligence, the protections envisaged in this section cannot be guaranteed and the reporting party or complainant is levied a disciplinary penalty.

## IMPARTIALITY, AUTONOMY AND INDEPENDENCE OF JUDGMENT

All parties that receive, examine and assess reports satisfy the relevant moral and professional requirements and ensure maintenance of the necessary independence, objectivity, expertise and diligence in the performance of their work.

Administration of the reporting channel is entrusted to a dedicated independent internal person or office with personnel specifically trained to administer the reporting channel, or to an appointed independent external party with specifically trained personnel.

## RETENTION OF THE DOCUMENTATION ABOUT REPORTS

Internal and external reports and the related investigation documents are retained for the time needed to process the reports and, in any case, for no longer than five years from the date of communicating the final outcome of the reporting procedures, in compliance with the confidentiality requirements.

Where reports contain information of relevance pursuant to Decree 231/2001, they are retained for a period of ten years, in accordance with the requirements of civil and criminal law for the retention of documentation. Where reports are relevant to court proceedings, they are retained for the time needed for the exercise of rights in such proceedings.

## 6 Parties involved

The reporting system may be activated by the following parties:

- members of corporate bodies;
- Employees (regardless of contract type) whose work requires their inclusion within the organization of the Company, even if not party to a formal subordinate relationship;
- Collaborators, freelance professionals, consultants;
- Volunteers, apprentices;
- Third parties (e.g. suppliers, clients);
- Persons with management, administration and control functions

## 7 Subject of the report

The new regulations introduced by Decree 24/2023 apply to breaches of national and EU regulations that erode the public interest or the position of the public administration or private body, which become known to the reporting parties in a public or private working environment.

Such reports may relate to:

- i)* unlawful conduct of the types specified in Decree 231/2001 and infringements of the 231 Model;
- ii)* administrative, accounting and civil offenses, as well as breaches of the European regulations governing transport safety, environmental protection, radio protection and nuclear safety, safety of food and animal feed, health and safety of animals, public health, consumer protection, protection of private life and personal data, security of networks and IT systems;
- iii)* breaches of the regulations governing competition and State aid.

Complaints are excluded if they relate to:

- i)* the personal interests of the reporting party in individual working relationships;

- ii) national defense and security;
- iii) breaches already governed on a mandatory basis in a number of special sectors (financial services, anti-money laundering, terrorism, transport safety, environmental protection).

For example, but without limitation, reports may relate to:

- infringements of workers' rights, including the accident prevention regulations;
- alleged unlawful activities, envisaged in the 231 Model adopted by the Company, by exponents in its interests or for its benefit;
- infringements of the Code of Ethics, the 231 Model or corporate procedures;
- unlawful conduct in the context of relations with exponents of the public administrations;
- breaches of the environmental protection regulations;
- infringements of private life and personal data protections.

With regard to the Gender Equality system, Significant Reports include, without limitation:

- Any infringement of the Gender Equality, Diversity and Inclusion Policy;
- Any discriminatory conduct contrary to the Gender Equality, Diversity and Inclusion Policy;
- Any form of verbal and/or physical violence.

With regard to Supply Chain Sustainability system, Significant Reports include, without limitation:

- Ethic (integrity in business, fair competition, intellectual property);
- Work (Refusal of forced and child labor, diversity and inclusion, fair dealing and working time);
- Freedom of association;
- Quality, health, safety and environment (requirements of quality, safety, product safety, occupational health and safety, process safety, emergency management, risk information and training, protection of the environment and resource conservation).

Reports are only taken into consideration if they relate to facts directly obtained by the reporting party, without reference to rumors; in addition, reports must not relate to personal complaints.

The reporting party must not use the procedure solely for personal purposes, revenge or reprisals that, if at all, are covered by the more general rules governing the working relationship/collaboration, or relations with a hierarchical superior or colleagues, specified in the relevant organizational procedures.

## 8 Procedure for managing reports

### 8.1. Internal reports

A reporting party with reasonable suspicion that one of the infringements indicated in section 7 above has or may have occurred, can make a report in one of the following ways:

- Open Report, using the e-mail address [organismo.vigilanza@granitifiandre.it](mailto:organismo.vigilanza@granitifiandre.it) or ordinary mail sent to the offices of the Company at via Radici Nord 112, Castellarano;
- Open Report, using the e-mail address [comitato.genere@granitifiandre.it](mailto:comitato.genere@granitifiandre.it) or ordinary mail sent to the offices of the Company at via Radici Nord 112, Castellarano, in a sealed envelope addressed externally to the "Gender Equality Steering Committee - Private and Confidential", in cases involving the matters described in section 7;
- Open, Confidential or Anonymous Report - at the discretion of the reporting party - using the *Whistleblowing* platform accessible via the website <https://granitifiandre.pawhistleblowing.it>;
- **Open or anonymous reports**, made by calling the ansaphone dedicated solely to *Whistleblowing* reports at +39 0536862888, and leaving a message containing the requested information;
- **Anonymous reports**, using the report box located at the registered office of the Company.

Reports must be detailed and based on precise and mutually consistent elements, relate to verifiable facts known directly by the reporting party, and contain all the information needed to identify the perpetrators of the unlawful conduct.

Accordingly, the reporting party must provide - in a clear and complete manner - all elements useful for the verification and checks necessary to evaluate the truthfulness and objective nature of the allegations, indicating

for example, but without limitation:

- details of the events that took place (e.g. date, location), all information and/or evidence that may provide valid support for the reported allegations;
- personal details or other elements that enable identification of the party that perpetrated the alleged deed;
- personal details of any other parties that may be able to comment on the reported facts;
- any personal interests linked to the Report.

In accordance with the Code of Ethics, the Company prefers reports not to be anonymous; nevertheless, anonymous reports may be accepted.

Anonymous reports are only accepted if they contain sufficient details to identify specific facts and situations. They will only be considered if they are not obviously irrelevant, without foundation or insufficiently detailed. For the protection of the reported party, the requirements of good faith and truthfulness regarding the facts or situations reported must be satisfied in all cases.

For reports not made via the *Whistleblowing* platform, a template *Reporting Form* is available on the corporate intranet, on the website [www.granitifiandre.it](http://www.granitifiandre.it) and at the foot of this document.

#### **8.1.1. Prerequisites**

Reports must be detailed and based on precise and mutually consistent elements, relate to verifiable facts known directly by the reporting party, and contain all the information needed to identify the perpetrators of the unlawful conduct.

Accordingly, the reporting party must provide - in a clear and complete manner - all elements useful for the verification and checks necessary to evaluate the truthfulness and objective nature of the allegations, indicating for example, but without limitation:

- details of the events that took place (e.g. date, location), all information and/or evidence that may provide valid support for the reported allegations;
- personal details or other elements that enable identification of the party that perpetrated the alleged deed;
- personal details of any other parties that may be able to comment on the reported facts;
- any personal interests linked to the report.

In accordance with the Code of Ethics, the Company prefers reports not to be anonymous; nevertheless, anonymous reports may be accepted.

Anonymous reports are only accepted if they contain sufficient details to identify specific facts and situations. They will only be considered if they are not obviously irrelevant, without foundation or insufficiently detailed. For the protection of the reported party, the requirements of good faith and truthfulness regarding the facts or situations reported must be satisfied in all cases.

For reports not made via the *Whistleblowing* platform, a template *Reporting Form* is presented at the foot of this document.

#### **8.1.2. Examination and Evaluation of reports**

As the report administrator, the SB carries out all activities deemed appropriate, in compliance with the principles of impartiality and confidentiality.

All the work needed to verify the facts reported is carried out directly by the report administrator.

They may also draw on the support and collaboration of corporate structures and functions when, given the nature and complexity of the checks, their involvement is needed; external consultants may also be used.

The confidentiality rights of the reporting party must be protected at all times when processing the report.

Specifically, the activities involved in managing reports comprise: receipt, investigation and verification;

- Receipt: the report administrator receives all reports. The reporting party must receive confirmation of

receipt within **seven days**, and the report administrator must follow-up all reports received in a diligent manner;

- Investigation and verification: the report administrator evaluates the reports received and, depending on their nature, draws on the internal structures of the Company to investigate further the facts reported. The reporting party, if identified, and/or the parties mentioned by the reporting party may be interviewed directly; following the investigation, a documented decision is made to either file away the report or request the Company to consider disciplinary action or penalties for the events that have occurred and/or appropriate changes to the 231 Model.
- Response: the report administrator responds to the reporting party **within 3 months** of the date on which receipt of the report was confirmed or, failing that, of the 7th day following receipt of the report.

Should the investigation identify infringements in the above sectors or give rise to reasonable suspicion that an offense was committed, the report administrator must promptly communicate the report and related considerations to the Board.

In addition, the report administrator must inform the non-anonymous reporting party - within a maximum of three months - about the progress of the *Whistleblowing* analysis/assessment, having regard for the requirement to keep confidential the information received, not least in compliance with the laws that prohibit external disclosure of the results.

Reports made for the purpose of damaging or otherwise causing harm to the reported party, as well as all other forms of abuse of this document, may give rise to penalties for the reporting party in disciplinary and other competent settings, especially if the facts reported, accusations, complaints etc. are determined to be unfounded and willfully and deliberately falsified.

In this regard and consistent with the above, the Company may take suitable disciplinary action if, during the verification work, the report is determined to be deliberately defamatory or unfounded and made with malice or gross negligence.

To guarantee reconstruction of the various phases of the process, the report administrator must document the reports received, by retaining them electronically and/or on paper, in order to ensure that the actions taken in performance of the established institutional functions are fully traceable.

Electronic documents are held on the platform, in a directory protected by access credentials known solely by the report administrator and other expressly authorized parties.

With regard to obvious Bad Faith Reports, the report administrator reserves the right to file them away, after redacting the names and other identification details of the reported parties.

Paper documents are held in an identified location, access to which is only allowed to the report administrator and other expressly authorized parties.

## **8.2. Protection of the reporting and reported parties**

### **8.2.1. Protection of the reporting party**

To facilitate the dissemination of a culture of legality and encourage the reporting of unlawful actions, the Company guarantees - in compliance with the related regulations - the confidentiality of the personal data of the reporting party and of the information contained in the report and received by all parties involved in the procedure; additionally, the Company guarantees that, in itself, the report does not infringe any obligations imposed by the working relationship.

As soon as the report is received, the report administrator and any other parties involved are responsible for guaranteeing the confidentiality of the reporting party, even if the report is later found to be incorrect or unfounded.

Failure to respect this obligation would represent an infringement of this procedure and expose the report administrator to liabilities.

In particular, the Company guarantees that the identity of the reporting party will not be revealed without

express consent from the latter, and all those involved in managing the report are required to safeguard its confidentiality unless:

- the report was made to damage or otherwise cause harm to the reported party (so-called bad faith report), exposing the reporting party to legal action for libel or defamation;
- confidentiality is not protected by law (e.g. criminal investigations etc.).

In particular, the identity of the reporting party cannot be revealed when any disciplinary action taken is founded on separate and additional investigations, beyond those related to the report, even if consequent to it. When the disciplinary action is founded, in whole or in part, on the report and knowledge of the identity of the reporting party is essential for the defense of the reported party, the report may only be used for disciplinary purposes if the reporting party has agreed to be identified.

It is not allowed or tolerated to subject the reporting party to reprisals or discrimination at work of any kind, whether direct or indirect, for reasons linked directly or indirectly to the report. Discrimination means unjustified disciplinary action, demotion without good reason, harassment in the workplace or reprisals of any other kind that create difficult or intolerable working conditions.

#### Limitations of liability

The reporting party cannot be punished for disclosing or disseminating information about breaches covered by secrecy requirements (except with regard to classified information, medical and forensic secrets, and court orders), copyrights or personal data protections, or that offend the reputation of the person involved or reported when, at the time of disclosure or dissemination, there were good reasons to believe that disclosing or disseminating such information was necessary in order to reveal the breach.

#### Facilitator

Facilitator means the natural person who assists a reporting party during the reporting process, acting within the same working environment and whose assistance must be kept confidential.

Decree 24/2023 seeks to protect whistleblowers from both direct reprisals – those targeting them directly, such as termination, mobbing, slander, etc. – and indirect reprisals – those targeting natural persons other than the whistleblowers, such as persons acting the same working environment who assist the whistleblowers during the reporting process (so-called “facilitators”), those against their colleagues or against relations who have a working relationship with their employer, customer or other recipient of services, those against bodies owned by the whistleblowers, for which they work or to which they are otherwise connected for business purposes, such as the cancellation of service contracts, inclusion on blacklists or boycotts.

Accordingly, the same measures (protection from reprisals and limitation of liability) apply not only to the reporting parties, but also to other specifically identified parties; facilitators, colleagues and relations of the reporting parties and legal persons associated with the reporting parties.

### **8.2.II. Protection of the reported party**

In accordance with current regulations, the Company has adopted the safeguards guaranteeing the privacy of the reporting party for the alleged perpetrator of the infringement as well, without prejudice to all other forms of legal liability that may require the reported party to be named (e.g. requests from the judiciary, etc.).

This document does not relieve parties that make bad faith reports from their responsibilities under criminal law, or from their exposure to disciplinary action. All other abuses of this procedure, such as reports that are obviously opportunistic and/or made for the sole purpose of damaging the reported party or others, as well as any improper use or intentional manipulation of the system governed by this procedure, are also subject to disciplinary actions and measures adopted by the competent authorities.

Persons involved in reports may be heard, even via the production of written observations and documents, as part of the investigation into the internal or external reports that relate to them.

## 9 Penalties

ANAC has the power to penalize breaches of the new regulations. In particular, the Authority levies administrative pecuniary penalties of between 500 and 2,500 euro on reporting parties determined to have civil liability, through malice or gross negligence, for defamation or slander.

Additionally, specific penalties are envisaged in the context of the penalty system integral to the 231 Model.

## 10 Privacy Notice

GranitiFiandre, company with registered office at via Radici Nord 112, Castellarano, controller of the processing of personal data, informs you pursuant to the G.D.P.R. that your personal data obtained via this report will be processed solely for purposes linked to compliance with the obligations arising under Decree 231/2001, and will be used, and subsequently retained, mainly in printed form.

Having recognized the legitimacy of anonymous reports, the provision of your data is optional and your refusal in this regard will have no effect on the validity of the work carried out by the Supervisory Body of GranitiFiandre (hereinafter, for simplicity, the SB). In all cases, the reporting party remains personally liable for any defamatory elements contained in the communications made and GranitiFiandre, via the SB, reserves the right to ignore any reports made in obvious bad faith.

Additionally, GranitiFiandre reminds you that the data provided by you must be relevant for reporting purposes, meaning that the SB need not follow up on reports about conduct or parties not subject to the obligations deriving from Decree 231/2001. Except in order to satisfy legal obligations, the personal data provided by you will not be communicated or disseminated in any way.

Pursuant to the G.D.P.R., you may exercise the following rights:

- Obtain information about the source of your data, as well as the purposes and methods of processing, the logic applied when processing is carried out using electronic equipment, and the identification details of the Controller, the Processors and the parties, or categories of party, to which the personal data may be communicated.
- Obtain the update, rectification or, if desired, completion of the data; the erasure, anonymization or restriction of data processed unlawfully, as well as data that need not be retained for the purposes for which it was collected or subsequently processed; the attestation of operations drawn to the attention of third parties, including their content and the parties to which the data was communicated or disseminated, except if such compliance is impossible or would require the use of resources obviously disproportionate to the right protected.
- Object, in whole or in part, for legitimate reasons to the processing of your personal data, even if relevant to the purposes for which it was collected.

In order to exercise the above rights, you may contact the SB, as a Processor designated by the Controller, at the e-mail address [organismo.vigilanza@granitifandre.it](mailto:organismo.vigilanza@granitifandre.it), or by ordinary mail sent to the Supervisory Body c/o the offices of the Company at Via Radici Nord n.112, 42014 Castellarano (RE) Italy.

## Template SB Reporting Form

### SB Reporting Form

Report about the commitment or attempted commitment of one of the offenses specified in Decree 231 dated June 8, 2001, on the "Administrative responsibility of legal persons, companies and associations, even without legal personality, pursuant to art. 11 of Law 300 dated September 29, 2000", or the infringement or fraudulent avoidance of the Organization, Management and Control Model and/or the Code of Ethics of GranitiFiandre.

PERPETRATOR OF THE REPORTED CONDUCT

DETAILED DESCRIPTION OF THE REPORTED CONDUCT

DETAILS OF THE REPORTING PARTY (IF REPORT NOT ANONYMOUS)

Name:

Surname:

Business Unit:

Telephone:

E-Mail:

Date

\_\_\_\_\_  
Signature

### Privacy Notice

GranitiFiandre S.p.A. company with registered office at Via Radici Nord 112, Castellarano, controller of the processing of personal data, informs you pursuant to the G.D.P.R. that your personal data obtained via this report will be processed solely for purposes linked to compliance with the obligations arising under Decree 231/2001, and will be used, and subsequently retained, mainly in printed form.

Having recognized the legitimacy of anonymous reports, the provision of your data is optional and your refusal in this regard will have no effect on the validity of the work carried out by the Supervisory Body of GranitiFiandre (hereinafter, for simplicity, the SB). In all cases, the reporting party remains personally liable for any defamatory elements contained in the communications made and GranitiFiandre, via the SB, reserves the right to ignore any reports made in obvious bad faith. Additionally, GranitiFiandre reminds you that the data provided by you must be relevant for reporting purposes, meaning that the SB need not follow up on reports about conduct or parties not subject to the obligations deriving from Decree 231/2001. Except in order to satisfy legal obligations, the personal data provided by you will not be communicated or disseminated in any way.

Pursuant to the G.D.P.R., you may exercise the following rights:

- Obtain information about the source of your data, as well as the purposes and methods of processing, the logic applied when processing is carried out using electronic equipment, and the identification details of the Controller, the Processors and the parties, or categories of party, to which the personal data may be communicated.
- Obtain the update, rectification or, if desired, completion of the data; the erasure, anonymization or restriction of data processed unlawfully, as well as data that need not be retained for the purposes for which it was collected or subsequently processed; the attestation of operations drawn to the attention of third parties, including their content and the parties to which the data was communicated or disseminated, except if such compliance is impossible or would require the use of resources obviously disproportionate to the right protected.
- Object, in whole or in part, for legitimate reasons to the processing of your personal data, even if relevant to the purposes for which it was collected.

In order to exercise the above rights, you may contact the SB, as a Processor designated by the Controller, at the e-mail address [organismo.vigilanza@granitifandre.it](mailto:organismo.vigilanza@granitifandre.it), or by ordinary mail sent to the Supervisory Body c/o the offices of the Company at Via Radici Nord 112, 42014 Castellarano (RE) Italy.

### Template Gender Equality Steering Committee Reporting Form

Details of the reporting party (if report not anonymous)	
Name and surname of the reporter	
Professional level or position	
Place of work	
Tel./Mob.	
E-mail address	
Report details	
Date/period in which the facts occurred:	dd/mm/yyyy
Location in which the facts occurred:	<input type="checkbox"/> in the workplace <input type="checkbox"/> outside the workplace
I believe that the actual/attempted actions or omissions:	<input type="checkbox"/> were criminal in nature; <input type="checkbox"/> infringed the Group Gender Equality, Diversity and Inclusion Policy and the rules of conduct envisaged by the gender equality system; <input type="checkbox"/> could cause psycho-physical damage to an employee of GranitiFiandre S.p.A.; <input type="checkbox"/> could damage the image of GranitiFiandre S.p.A.; <input type="checkbox"/> could damage employees or other parties working at GranitiFiandre S.p.A.; <input type="checkbox"/> other (specify).
Description of the fact (conduct or event)	

Perpetrator(s) of the fact	1. .... 2. .... 3. ....
Any other parties with knowledge of the fact and/or able to comment on it	1. .... 2. .... 3. ....
Any documents that support the report	1. .... 2. .... 3. ....

<p>All other information that may provide useful evidence regarding the facts reported.</p>	
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