



## Whistleblowing Policy

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| 29 March 2022 | 1.0      | Whistleblowing Policy |



## **SUMMARY**

1. Foreword
2. Recipients and scope of application
3. Subject of the report
4. Content of the report
5. Reporting
6. Verification activities
7. Protection of the reported person
8. Protection of the reporting person
9. Data processing
10. Archiving of documentation



## **1. FOREWORD**

On 29 December 2017, Law No. 179 "Provisions for the protection of the authors of reports on crimes or irregularities of which they have become aware in the context of a public or private employment relationship" (published in the Official Gazette, General Series No. 291 of 14 December 2017) came into force, introducing measures related to the submission and management of the reports.

The purpose of the law is to encourage workers' cooperation in order to facilitate the emergence of corrupt practices within public and private entities, also by providing for systems enabling workers to report in safe conditions any wrongdoing of which they become aware. In fact, the law regulates:

- The prohibition of direct or indirect retaliatory or discriminatory acts against the whistleblower for reasons directly or indirectly linked to the report;
- the introduction of sanctions against those who violate the measures for the protection of the reporting person, as well as against those who make, with malice or serious misconduct, reports that turn out to be unfounded;
- the possibility for the whistleblower or the trade union organisation to denounce the adoption of discriminatory measures against the reporting persons to the National Labour Inspectorate;
- the nullity of retaliatory or discriminatory dismissal, as well as of the change of duties pursuant to Article 2103 of the Civil Code, and any other retaliatory or discriminatory measure taken against the reporting person;
- the burden on the employer, in the event of disputes relating to the imposition of disciplinary sanctions, or to demotions, dismissals, transfers, or subjecting the whistleblower to other organisational measures having direct or indirect negative effects on the working conditions, following the submission of the report, to demonstrate that such measures are based on reasons unrelated to the report itself.

Slowear S.p.A. and its controlled or affiliated companies (hereinafter "Slowear") undertake to make available a reporting procedure which guarantees the confidentiality of the identity of the reporting person in the management of the reports, aimed at denouncing potential violations of the law or conduct contrary to company policy on the part of subjects who have a relationship of interest with Slowear.

## **2. RECIPIENTS OF THE PROCEDURE AND SCOPE OF APPLICATION**

This procedure applies extensively to the Board of Directors, the Representatives of the delegated company functions, the managers and the employees of Slowear ("Recipients").

The Recipients, who are aware of facts which could potentially be the subject of a report, are invited to make the report promptly, using the methods described below and refraining from undertaking independent initiatives of analysis and/or investigation.

Each person shall proceed in compliance with the tasks, roles and responsibilities established by this procedure.



### **3. SUBJECT OF THE REPORT**

Reports concerning unlawful conduct, offences or irregularities, committed or attempted, to the detriment of the public interest are considered relevant.

The report may concern actions or omissions::

- ✓ criminally relevant;
- ✓ carried out in violation of company policies or other sanctionable company provisions or regulations;
- ✓ likely to cause financial or reputational damage to Slowear or to its employees or other individuals who carry out their activities in the Company.

### **4. CONTENT OF THE REPORT**

The whistleblower is required to provide all useful elements to enable the competent offices to carry out the necessary and appropriate checks to verify the validity of the facts reported.

To this end, the report should preferably contain the following elements:

- details of the person making the report with an indication of the position or function held within the company;
- clear and complete description of the facts to be reported;
- if known, the circumstances of time and place in which they were committed;
- if known, the personal details or other elements (such as the position and the department in which the activity is carried out) that make it possible to identify the person who has carried out the facts that are the subject of the report;
- an indication of any other persons who may report on the facts being reported;
- an indication of any documents that may confirm the validity of the facts in question;
- any other information that may provide useful feedback on the existence of the facts reported.

Slowear also takes into consideration anonymous reports (i.e. those without any useful reference for the purposes of identifying the person making the report) provided that they are forwarded in accordance with the procedures set out in this procedure and are adequately detailed and based on precise and concordant elements, such as to bring to light facts and situations relating to specific contexts (such as the indication of names or qualifications, specific offices, particular events, etc.).

### **5. REPORTING**

Reports should be made without delay directly to the Human Resources Department, through one of the following channels:

- in paper form addressed to the Human Resources Department;



- anonymously, by filling in the online form shared by the Human Resources Department at <https://forms.office.com/r/6DfZ26wzh1>.

## **6. VERIFICATION OF ACTIVITIES**

All reports will be dealt with immediately and an investigation of the case will be launched.

After receiving the report, the Human Resources Department will make an initial assessment of whether the report is well-founded:

- whether the report concerns illegal conduct or significant violations;
- whether the report contains sufficient elements to be verified or whether, on the contrary, it is too general or insufficiently detailed to allow a subsequent investigation to be carried out;
- whether the subject of the report has already been assessed beforehand.

The Human Resources Department, having assessed the report as not relevant or verified that the fact reported has already been examined, shall proceed to file the report, informing the reporting party (if known).

On the other hand, in the event of a detailed report of relevant conduct, it shall start the investigation, availing itself if necessary of Company structures.

At the end of the investigation activities, the Human Resources Department assesses the results and may decide whether to (iii) forward the report to the Board of Directors, to the Legal Department and to the area concerned, for them to adopt the relevant measures, each within its competence, including, if the conditions exist, the request for disciplinary action.

Verification activities must in all cases be timely and accurate, and comply with the principles of impartiality, fairness and confidentiality.

## **7. PROTECTION OF THE REPORTED PERSON**

Slowear adopts all the necessary measures to protect the confidentiality of the identity of the reported person, during all the stages of investigation and verification.

Similarly, Slowear censures any violation, committed with malice or serious misconduct, of the prohibition to make unfounded reports.

In particular:

- reports must not contain accusations which the reporter knows to be false and, in general, intends to use as a tool to resolve mere personal issues;
- it prohibits any possible retaliatory or discriminatory conduct towards the Whistleblower relating to or resulting from the report;
- the criminal and civil liability of the whistleblower shall remain unaffected in the event of a slanderous or defamatory report and/or a report made for the sole purpose of damaging the



reported person, as well as any other case of intentional abuse or exploitation of the whistleblowing procedure.

## **8. PROTECTION OF THE REPORTING PERSON**

Slowear adopts, first of all, all the necessary measures to protect the confidentiality of the identity of the reporting person. In addition, Slowear censures any possible retaliation or discriminatory behaviour against the person making the report, for reasons directly or indirectly linked to the report, such as but not limited to:

- dismissal;
- demotion;
- unjustified transfer;
- *mobbing*.

Slowear foresees the application of disciplinary sanctions (up to dismissal) against any employee who engages in retaliatory conduct during the verification practices in violation of this protocol.

In addition, Slowear will not take any punitive action against any employee who provides personal aid or information by the law regarding Slowear's or other employees' participation or alleged participation in illegal activities.

Violations of company policies, regulations or laws will not be permitted and may result in disciplinary action, up to and including dismissal.

## **9. DATA PROCESSING**

The processing of the personal data of the persons involved and/or mentioned in the reports is carried out in accordance with the law in force and the privacy procedure.

## **10. ARCHIVING OF DOCUMENTATION**

All reports received, regardless of the channel, are filed by the Human Resources Department.

The documentation relating to the activities described in this procedure must be kept intact for the proper traceability of the entire process and to facilitate any subsequent checks.