

OPERATIONAL PROCEDURES

Whistleblowing guidelines



Whistleblowing

Any individual identifying a potential violation that falls within the scope of whistleblowing policy should simply click on the link shared by the company.



GAMMA

File a report



No personal details are required to login; simply click on the 'File a Report' button .

Whistleblowing

The platform will display a short Privacy Policy.

Click on the **'Privacy Policy Document'** button to download the full Privacy Policy.

Click on **'Continue'** to continue to file your report,

Segnalazione delle violazioni di disposizioni normative nazionali o dell'Unione europea che ledono l'interesse pubblico o l'integrità dell'amministrazione pubblica o dell'ente privato ai sensi dell'Art. 2, comma 1, lett. a) del D.Lgs. 10 marzo 2023 n. 24, di attuazione della direttiva (UE) 2019/1937

Si comunica che la presente segnalazione verrà trattata nel rispetto della tutela della riservatezza dell'identità del segnalante, nel rispetto dell'art. 12 del D.Lgs. 10 marzo 2023 n. 24.

Si precisa, inoltre, che i dati personali del segnalante verranno trattati in ottemperanza a quanto prescritto dal Regolamento Europeo 679/2016, del decreto legislativo 30 giugno 2003, n. 196 e del decreto legislativo 18 maggio 2018, n. 51 in materia di tutela dei dati personali, come previsto dall'art. 13 del D.Lgs. 10 marzo 2023 n. 24.

È possibile effettuare segnalazioni in forma anonima. Alla conclusione del processo di segnalazione, sarà assegnato un codice ticket esclusivamente al segnalante, che gli permetterà di accedere alla segnalazione, visionare le eventuali risposte fornite e dialogare con il personale preposto. Inoltre, sarà possibile allegare ulteriori documenti. Si consiglia vivamente di memorizzare il codice in un luogo sicuro.

Nel testo della segnalazione è possibile inserire la richiesta di incontrare di persona il soggetto o i soggetti incaricati di trattare la segnalazione per esporre oralmente i fatti.

Alla segnalazione si applicano le misure di protezione previste dall'art. 16 e le limitazioni di responsabilità di cui all'art. 20 del D.Lgs. 10 marzo 2023 n. 24. Come previsto dall'art. 16, co. 3 del medesimo decreto, sono invece fonte di responsabilità disciplinare nelle sedi competenti eventuali forme di abuso del presente sistema di segnalazione, quali segnalazioni manifestamente opportunistiche e/o effettuate al solo scopo di danneggiare il denunciato o altri soggetti, e ogni altra ipotesi di utilizzo improprio, commesso con dolo o colpa grave, del presente istituto.



Whistleblowing

The “**Reopen Ticket**” button allows you to view the status of a report you have previously filed in order to monitor its progress and check any replies from the operator.

Click on the ‘**File a new report**’ button if this is the first time you are reporting a specific breach.

File a report
Company: GAMMA



File a new report



Reopen Ticket

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The report potentially involves the actions of specific members of the management committee.

Therefore, the first action required by the platform is to exclude any persons for whom the report is not intended.

Indicate which department should receive your report

To exclude (or gain a clearer understanding of) one or more of these subjects, simply check the box next to the name.



Standard entrusted operator



ACQ – Purchasing department



DC – Sales & Marketing

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The form used to report a breach includes both mandatory fields, which are marked with an asterisk (*), and optional fields.

You are required to enter a short title summarising the violation and identify the category of violation by choosing from a drop-down menu.

All fields are optional apart from those with an asterisk (*)

(*) Subject (a title summarising the report you are filing)

* write here

(*) Nature of the violation/breach to report



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These fields concern the person filing the report and specific details concerning the breach. They are NOT mandatory.

Name and surname of person filing the report

Role/position in the Company of the person filing the report

Email (to receive report status) of person filing the report

Telephone number of person filing the report

Date/period in which breach occurred line

Location in which breach occurred

Name of person(s) committing the breach

Third parties aware/informed of the breach and/or able to give information concerning the breach

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A final mandatory field asks the person filing the report to consent to share information allowing their identity to be traced (in the event they have provided it) with parties other than the person in charge of managing the report of the breach.

The person in charge of managing the report may, if they deem it necessary, choose to involve other departments/functions in order to deal with the violation.

In the event that the person filing the report denies their consent, those other departments/functions will not be made aware of sensitive information that may lead back to the identity of the reporting person..

(*) Esprimo il consenso a rilevare la mia identità a persone diverse da quelle competenti a ricevere e gestire le segnalazioni ed espressamente autorizzate a trattare tali dati ai sensi degli art. 29 e 30, par. 1 del regolamento UE 2016/679 e dell'art. 2 -quattordicesimo del codice in materia di protezione dei dati personali di cui al decreto legislativo n.196 del 2003

I agree I do not agree

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A **Captcha** entry is required at the end of the form to ensure digital protection and security.

Write the number that appears below in the Captcha field

  Captcha

Continue

Click on the «**Continue**» button to continue

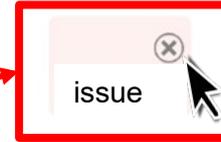
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At this point, the platform opens an **asynchronous chat** between the person reporting the breach and person in charge of managing the report. This allows the two parties to exchange the necessary information in order to develop and further investigate the violation.

When you are certain of the content you wish to send, click on '**Complete report and send**'.

Message still to send

The **message** may still be **changed**. Confirm and send the final message by clicking on the "X" button.



Attach documents, pictures, or other types of file

Write your **text message** here.

Send an **audio message**



*text



Complete the report and send

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After confirming submission, the report will be finally delivered to the person responsible for managing the report. The platform will issue an **alphanumeric code**. You should make a note of this code, keep it safe and not disclose to third parties.

The code is the only means of **accessing your filed report to check on its status** and receive a reply from the person managing your report.

Ticket password

HE8LOBD8T2

Email address to receive updates and status of your report

Set your notification service



You may set up an **email notification service** by entering your email address and clicking on the button to confirm.

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To check the status of a report you have filed, it is necessary to click on '**Reopen and/or check the status of a report previously filed**' and then enter the code in the space provided.

New report



Reopen and/or check the status of a report previously filed

Ticket password