



The Whistleblowing Channel

The legislation

Legislative decree 10 March 2023, n. 24 ("whistleblowing decree") implemented directive (EU) 2019/1937 ("whistleblowing directive"), concerning the protection of persons who report violations of EU law and containing instructions regarding the protection of persons who report violations of national regulatory provisions.

Whistleblowing policy

ATELIER STIMAMIGLIO SRL has adopted a **PROCEDURE** with operational indications regarding the object, content, recipients, methods of transmission and management of reports regarding violations that fall within the scope of application of the aforementioned whistleblowing decree.

The internal reporting channel

Reports must be sent through the designated internal channel accessible at the following address: <https://atelierstimamiglio.whistleblowing.qhub.it/#/>

The IT platform allows reports to be made in written or oral form, recording a voice message which will be encrypted and morphed to make the voice of the reporter unrecognizable.

The reporter may request a direct meeting with the reporting channel manager, which will be agreed upon within a reasonable time.

The platform guarantees, thanks to encryption tools, the privacy of both the identity of the reporter, the person involved and the people mentioned in the report, as well as the relevant documentation. The data is saved on servers outside the company network.

Other reporting channels

In addition to the internal reporting channel within the work context (see above), it is possible, under certain conditions, to submit reports via:

- ✓ external channel (ANAC): <https://whistleblowing.anticorruzione.it/#/>
- ✓ public dissemination (through the press, electronic means or means of dissemination capable of reaching a large number of people);
- ✓ report to the judicial or accounting authority.

(for the choice of the reporting channel other than the internal channel and for the conditions that allow its use, see: <https://www.anticorruzione.it/-/whistleblowing#p11>)

Processing of personal data

It is recommended to read the specific information on the processing of personal data prepared pursuant to articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"). To proceed with the report through the software, the person making the report must first read the information relating to the processing of personal data by "flagging" the relevant box.

FAQ

What is WHISTLEBLOWING?

The reporting action carried out by the **whistleblower**.

Who is the WHISTLEBLOWER or “reporter”?

The literal meaning is "whistle blower", that we can define as "reporter": in general, the term indicates the person who reports crimes, irregular behaviors or situations not of personal but general interest and of which he becomes aware in the work environment due to the role (e.g. employee or business consultant).

Concretely, the report can be issued by: employees, self-employed workers, collaborators, freelancers, consultants, volunteers and interns, paid and unpaid, who provide their services to **ATELIER STIMAMIGLIO SRL**; shareholders and people with administrative, management, control, supervisory or representation functions, even if these functions are exercised on a purely de facto basis, at **ATELIER STIMAMIGLIO SRL**.

These individuals report information on violations of which they become aware within their work context.

Reports can also be made:

- when the legal relationship with **ATELIER STIMAMIGLIO SRL** has not yet begun, if the information on the violations was acquired during the selection process or in other pre-contractual phases;
- during the probationary period;
- after the dissolution of the legal relationship if the information on the violations was acquired during the relationship itself.

What can be reported?

In general, violations of national regulatory provisions (such as criminal, civil, administrative or accounting offences), violations of the organization and management models provided for in Legislative Decree 231/2001, of the procedures, of the Code of Ethics (if adopted by the company), of the company's internal regulations and/or in any case violations capable of causing damage or prejudice, even if only to the image or reputation of the company itself:

- administrative, accounting, civil or criminal offences;
- significant illicit conducts pursuant to Legislative Decree. 8 June 2001, n. 231;
- offenses that fall within the scope of application of European Union acts and the national provisions that implement them;
- acts or omissions that harm the financial interests of the European Union (for example: fraud, corruption and any other illegal activity connected to the European Union expenditure);
- acts or omissions concerning the internal market (for example: violations relating to competition and State aids);
- acts or behaviors that frustrate the object or purpose of the provisions of the European Union in the sectors indicated in the previous points (for example, abusive practices that violate the protection of free competition).

By way of example and not exhaustively, the violations that must be reported violations or alleged violations, national or of community law relating to: accounting and tax-related illicit or falsification of documents; violations relating to the protection of health and safety at work, the environment, the protection of privacy and personal data, consumer protection, tax or fiscal violations or non-compliances; corruption; negligence or conduct that may cause cases of corruption; violations of codes or policies adopted by the company, etc.

How should a report be made via internal reporting channel?

The report must be detailed and contain all the elements useful to ascertain the validity of the facts covered by the report in order to allow the channel manager to carry out the necessary checks. The report must not have defamatory or slanderous content.

Essential elements are: the identifying data of the reporting person (name, surname, place and date of birth), as well as an address to communicate subsequent updates or the ways in which the reporting person wishes to be contacted; the circumstances of time and place in which the reported event occurred; a clear and complete description of the facts covered by the report and in any case any other information that may be useful for verifying the validity of the reported fact; the indication of any other people who can report the facts being reported; the personal details or other elements that allow the identification of the person to whom the reported facts can be attributed; any documents or elements that may confirm the validity of the facts presented.

The IT platform is made available to the reporting party at the address:

<https://atelierstimamiglio.whistleblowing.qhub.it/#/> and facilitates, through guided fields, the insertion of all the useful elements to allow the report manager to proceed with checks and investigations on the validity of the facts being reported.

The reports must be made in good faith and present facts of which the person making the report is aware, having reasonable grounds to believe that the information communicated is true: the criminal and civil liability of the person making the report remains unaffected if the report constitutes the crime of slander or of defamation. Sending reports with intent or gross negligence that prove to be unfounded will be subject to disciplinary measures.

Reports must be made as promptly as possible with respect to knowledge of the facts in order to allow timely verification.

What can't be reported?

The reports that can't be included in the whistleblowing procedure: disputes, claims or requests linked to a personal interest of the whistleblower which relate exclusively to their individual employment relationship, or inherent to their relationship with hierarchically superior figures (e.g. reports regarding employment disputes); communications or complaints relating to activities of a commercial nature or services to the public and so-called "rumors".

How to make a report?

ATELIER STIMAMIGLIO SRL has adopted the following channels through which it is possible to submit a report:

- ✓ Portal/software, reachable at: <https://atelierstimamiglio.whistleblowing.qhub.it/#/>
- ✓ Voice recording (on a registered message/voice box) in the Portal/Software in which the voice is made unrecognizable
- ✓ Direct meeting (on request) with the reporting manager of FAIV – FEDERAZIONE ARTIGIANI IMPRENDITORI VICENTINI, in the person of Eng. Marco Zanchin at the headquarters of Confartigianato Vicenza, Via E. Fermi 134, 36100 Vicenza (VI). The request for a direct meeting can be forwarded via the platform itself (in the text of the report it is possible to insert the request to meet the person in charge of dealing with the report to orally explain the facts), or by calling the number 0444 392300 during office hours.

Are anonymous reports allowed?

Reports from which it is not possible to deduce the identity of the reporter are considered anonymous. Anonymous reports, where detailed, are treated as ordinary reports and treated sequentially in accordance with the provisions of this procedure.

In the case of anonymous reporting, the protections that the legislation provides for the reporter cannot be activated. In any case, the anonymous reporter, if subsequently identified, will be able to take advantage of the protection that the legislation ensures against any retaliation or discrimination against the reporter itself (see next paragraph).

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How is the whistleblower protected?

Throughout the reporting process, **ATELIER STIMAMIGLIO SRL** guarantees the confidentiality of the reporter, in compliance with legislative provisions. **ATELIER STIMAMIGLIO SRL** prohibits (and sanctions) any form of retaliation or discrimination (direct or indirect, active or omissive, even just threatened or attempted) against the whistleblower, because of the reporting presented. These behaviors (retaliatory or discriminatory) will be subject to disciplinary sanctions. Besides, **ATELIER STIMAMIGLIO SRL** guarantees the protection of third parties connected to the whistleblower (relatives, colleagues, legal entities that the whistleblowers own or work for, facilitators) who operate in a work context connected to **ATELIER STIMAMIGLIO SRL**. By facilitator we mean someone who assists the whistleblower in the process of making the report, operating within the same working context and whose assistance must be kept confidential.

Data retention times

In no case will the reporting data and related documentation be kept for a period of time exceeding 5 years starting from the date of communication of the final outcome of the reporting procedure.