



“WHISTLEBLOWING INTERNAL CHANNEL”

Funo, 15/12/2023

(D. Lgs. 24/2023)

In compliance with the Legislative Decree 24/2023, OMP activated the internal Whistleblowing channel to report possible unlawful acts committed during the course of business or in connection therewith. The person in charge of managing the report received is the Head of the Legal Department (*Whistleblowing Manager*).

The report can be submitted by phone (calling the following number: 051869554) or by post mail, in that case the report must be placed in two sealed envelopes, in the first envelope will be inserted the contact details of the reporter (*Whistleblower*), in the second envelope the subject of the report (description of the facts and copies of the documents). Both of the envelopes must be sealed in a third envelope with the following caption on the outside “**STRICTLY CONFIDENTIAL – for the WHISTLEBLOWING MANAGER**”.

The channel can be used by all parties who have relations with the company, so not only workers, but also employees, consultants, shareholder, directors, supervisory bodies, and other third parties.

Reports involving the violation of national or European Union regulatory provisions that may harm the public interest or integrity of OMP and of which the *Whistleblower* has become aware in the business context, are considered relevant.

In particular, reports of illegal acts will be evaluated in the areas of: public procurement; services, products, and financial markets; prevention of money laundering and terrorist financing; product safety and compliance; environmental protection; consumer protection; privacy and personal data protection; network and information system security; violations of European provisions that harm the financial interests of the Union, the internal market, and/or that defeat the object or purpose of the provisions of the Union acts in the areas mentioned above; violations of national provisions that constitute administrative, accounting, civil, or criminal offenses.





Reports may not involve pure suspicions or news purely reported by third parties or otherwise having no factual elements or univocal documents to support them.

It's particularly important that the report includes the following elements:

- a detailed description of the facts occurred and the manner in which they became known;
- date and place where the facts occurred;
- contact data of the *Whistleblower*;
- names and roles of the people involved or elements that might allow their identification;
- names of any other individuals who may report on the facts being reported;
- reasons for why one retains that the reported facts are believed to constitute a violation;
- reference to any documents that can confirm the validity of the reported facts;
- indication of any private interest of the *Whistleblower* related to the report;
- any other information that may provide a useful verification regarding the existence of the reported facts.

The confidentiality of the report, the identity of the *Whistleblower*, the reported person and the persons mentioned in the report as facilitators or persons informed about the facts is guaranteed until the conclusion of the proceedings, initiated on account of the report. The protections will not be granted in case of reports concerning disputes, claims or requests related to an interest of personal nature of the *Whistleblower* that relate exclusively to his or her individual employment relationship for which recourse must be made to the various procedures established by the company. Also excluded from the above protections, are reports concerning violations known outside the business context or based on current rumors and not on facts directly learned from the *Whistleblower*.

Reports made with the purpose of harming the reported person, made with intent or serious guilt, which prove to be clearly unfounded, are also not allowed and are sanctioned. In such a case, the Whistleblower would be guilty of the crime of calumny and/or defamation, with criminal consequences.

The *Whistleblower* may make an external report, but only in the presence of one of the following conditions: the *Whistleblower* has already made an internal report and the report has not been followed up; the *Whistleblower* has reasonable grounds to believe that if he or she made an internal report, the report would not be effectively followed up or that the report may result in the risk of retaliation; the *Whistleblower* has





reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest. The external reporting channel was set up by the National Anticorruption Authority ANAC by accessing to the website www.anticorruzione.it.

Finally, a report with public disclosure is also permitted; the same protection measures may also be guaranteed in this case if the *Whistleblower* has previously made an internal and external report, or has made an external report directly, under the conditions and in the manner provided for in this Procedure, and no response has been received within the established time limits regarding the measures planned or taken to follow up the reports; the reporting person has well-founded reason to believe that the violation may pose an imminent or obvious danger to the public interest; the *Whistleblower* has well-founded reason to believe that the external report may involve the risk of retaliation or may not be effectively followed up due to the specific circumstances of the specific case, such as those where evidence may be concealed or destroyed or where there is a well-founded fear that the person who received the report may be colluding with or involved in the violation. Reports, internal and external, and the related documentation will be retained for as long as necessary for the processing of the report, but no longer than five years from the date of the communication of the final outcome of the reporting procedure.

O.M.P. OFFICINE MAZZOCCO PAGNONI S.R.L.

