



WHISTLEBLOWING - F.A.Q.

<p>Who can make a report?</p>	<p>Reports may be made by, but are not limited to, the following individuals:</p> <ul style="list-style-type: none"> ▪ employees or former employees (any type of contract) of the Italian companies of the AB Group; ▪ self-employed workers, collaborators, freelancers and consultants working for the Italian companies of the AB Group; ▪ paid and unpaid volunteers and trainees working at the Italian companies of the AB Group; ▪ shareholders and persons with functions of administration, management, control, supervision or representation, even if such functions are exercised on a de facto basis, at the Italian companies of the AB Group; ▪ workers or collaborators of third parties having relationships and/or business relations with the Italian companies of the AB Group (e.g. customers, suppliers, intermediaries and partners in joint ventures).
<p>What can be reported?</p>	<p>Reports have to refer to conduct, acts or omissions of which the Whistleblower has become aware in the context of his or her work and which violate the following regulatory provisions:</p> <ul style="list-style-type: none"> ▪ unlawful conduct pursuant to Legislative Decree 231/01 or breaches of the Organization, Management and Control Models pursuant to Legislative Decree 231/01, including the Code of Ethics; ▪ breaches of European Union regulations or national transposition acts relating to specific sectors, including but not limited to: public procurement, services, financial products and markets, prevention of money laundering and terrorist financing, product safety and compliance, transport safety, environmental and public health protection, consumer protection and personal data protection; ▪ breach of the financial interests of the European Union or affecting the internal market, including EU competition and state aid violations.

<p>What can NOT be reported under the Whistleblowing regulations?</p>	<p>Reports regarding the following matters, shall not be taken into account, and will therefore be dismissed by informing the Whistleblower of the relevant reasons:</p> <ul style="list-style-type: none"> ▪ concerning matters of a personal nature of the Whistleblower, claims or requests relating to the employment laws or relations with the hierarchical superior or colleagues; ▪ having insulting tones or containing personal offences or moral judgments and aimed at offending or harming the personal and/or professional honour and/or decorum of the person or persons to whom the reported facts refer; ▪ based on mere suspicions or rumours concerning personal facts not constituting an offence; ▪ for purely defamatory or slanderous purposes; ▪ of a discriminatory nature, in that they refer to sexual, religious or political orientation or to the racial or ethnic origin of the reported person.
<p>What should I indicate in the report?</p>	<p>For the report to be admissible, the following must be indicated in it:</p> <ul style="list-style-type: none"> ▪ a clear and complete description of the facts that are the subject of the report; ▪ any information and indications useful for identifying the identity of the perpetrators of the offence; ▪ the nature, the context of reference and any useful details to describe the subject of the alert; ▪ the circumstances of time and place, if known, relating to the subject of the report; ▪ any further information deemed useful for the investigation of the report, attaching supporting documentation if available; ▪ witnesses or persons who can report on the facts that are the subject of the report.
<p>Can I attach documents to the report?</p>	<p>Yes, in the form of text, image, audio and video files and within a maximum limit of 10mb.</p>
<p>Can I submit a report anonymously?</p>	<p>Yes, it is possible to submit reports anonymously.</p> <p>AB will consider such reports if they are punctual, adequately substantiated and supported by appropriate documentation. AB considers, among the relevant factors for assessing the report made anonymously, the seriousness of the offence reported, the credibility of the facts represented and the possibility of verifying the truthfulness of the offence from reliable sources.</p>
<p>How can I make a report?</p>	<p>The Whistleblower can use the 'AB-IntegrityLog' platform available at the whistleblowing webpage on the AB Group's website, at the following link 'https://www.gruppoab.com/whistleblowing/'. By accessing this channel, the reporter has the option of selecting the Italian company of the AB Group to which he or she wants to address his or her report.</p>
<p>In what form can the report be made?</p>	<p>Reporting can be made:</p> <ul style="list-style-type: none"> ▪ in written form; ▪ orally, through the recording of a voice message (the voice will be recognisable).

	As an alternative to the written report and the oral report on the 'AB-IntegrityLog' platform, the whistleblower, again via the platform, can request a direct meeting with the WB Committee
Who will receive and handle my report?	<p>Reports are received, analyzed, verified and processed by an internal body, the WB Committee.</p> <p>The WB Committee is a dedicated autonomous body with specifically trained staff to handle reports.</p> <p>Should the subject of the report concern unlawful conduct pursuant to Legislative Decree 231/2001 and/or a breach of the Organization, Management and Control Model pursuant to Legislative Decree 231/01, the Supervisory Board (if any) shall be responsible for handling such reports.</p>
How should I report if one of the members of the WB Committee is involved in the report to some extent?	<p>If one of the members of the WB Committee coincides with the Whistleblower, the reported person or is otherwise a person involved or affected by the Report, the Report will be handled by the other members of the WB Committee, to the exclusion of the person involved or affected by the Report.</p> <p>If all the members of the WB Committee coincide with the Reporting Party, with the reported person or are in any case persons involved in or affected by the Report, the Report shall be handled by the Supervisory Board of the company concerned by the Report, if it has a Management, Organization and Control Model pursuant to Legislative Decree no. 231/2001, or by the administrative body, if the company concerned does not have a Model.</p>
What happens if the unique 'Token ID' code is lost?	<p>If the Token ID code is lost, it can no longer be recovered.</p> <p>A new report will then have to be made.</p>
What happens once a report is made?	<ul style="list-style-type: none"> ▪ Within 7 days, the Whistleblower will receive a reply that his report has been taken into account. ▪ Within three months from the date of the acknowledgement of receipt and acknowledgement of the report or - in the absence of such notice - within three months from the date of expiry of the seven-day period for such notice, the whistleblower will receive feedback on his report. This acknowledgement may either be final if the investigation has been completed or interlocutory on the progress of the investigation if it is still ongoing.
How can I supplement my report?	After submitting the report, it is possible to supplement it by attaching photos and documents with any further information and/or clarifications, by accessing the report itself via your Token ID and entering a message in the 'messages' area of the 'AB-IntegrityLog' platform.
How are personal data processed in the context of reporting?	Information on the purposes and modalities of the processing of personal data is set out in the Privacy Policy, which can be found on the web page of AB's website at the following link " https://www.gruppoab.com/it/whistleblowing/ ", or as an attachment to the procedure uploaded on the site, and finally also on the platform when submitting the report.

<p>How is the confidentiality of the reporter's identity guaranteed?</p>	<p>The whistleblowing platform implemented by the AB Group is an IT tool that, also by means of an encryption system, guarantees the confidentiality of the identity of the whistleblower, the person involved and the person mentioned in the report, as well as the content of the report and the relevant documentation.</p>
<p>Can the identity of the whistleblower be disclosed?</p>	<p>The identity of the whistleblower may only be disclosed to parties other than the WB Committee if there is the express consent of the whistleblower to the disclosure of his or her identity, except in cases where the request for disclosure comes from the judicial authority.</p>
<p>As a whistleblower, can I benefit from protection from retaliation?</p>	<p>In accordance with the provisions of the applicable legislation, the AB Group guarantees protection against any act of retaliation, discrimination or penalization, whether direct or indirect, against the whistleblower for reasons directly or indirectly linked to the report.</p>
<p>How is protection from slanderous or defamatory reports guaranteed?</p>	<p>Slanderous or defamatory reports are not allowed and are censured. In this regard, when the criminal liability of the whistleblower for the offence of defamation or slander or his civil liability for the same offence, in cases of willful misconduct or gross negligence, is established by a court, even if not final at first instance, the protections against retaliation do not apply and the whistleblower is subject to disciplinary sanction.</p>