

## The Whistleblowing Institute in Brief The Legislation

Legislative Decree dated 10 March 2023, no. 24 (“Whistleblowing decree”) implemented the Directive (EU) 2019/1937 (“Whistleblowing directive”), concerning the protection of people reporting violations of European Union legislation and of National law.

### **Whistleblowing policy**

RANCAN SRL has adopted a PROCEDURE with operational instructions regarding the subject, content, recipients, methods of transmission and management of reports concerning violations that fall within the scope of the aforementioned whistleblowing decree.

### **The internal reporting channel**

Reports must be transmitted through the appropriate internal channel accessible at the following address:  
<https://rancan.whistleblowing.qhub.it>

The IT platform allows you to make reports in written or oral form, recording a voice message that will be encrypted and morphed in order to make the reporting person's voice unrecognizable.

The reporting person may request a direct meeting with the reporting channel manager, which will be arranged within a reasonable time frame.

The platform guarantees, thanks to encryption tools, the confidentiality of both the identity of the reporting person, of the person involved or of 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, it is possible to submit reports via:

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

For the choice of a reporting channel different from the internal reporting channel and for the conditions that allow its use: <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 in accordance to Articles 13 and 14 of Regulation (EU) 2016/679 (“GDPR”).

## **FAQ**

### **What is WHISTLEBLOWING?**

The reporting action carried out by the whistleblower.

### **Who is the WHISTLEBLOWER or “reporter”?**

The literal meaning is “whistle blower”, in Italian it can be defined as “reporter”: in general the term indicates the person who reports illicit, irregular behaviors or situations not of personal but of general interest and of which he becomes aware in the workplace due to his role (e.g. employee or company consultant).

Specifically, the whistleblower allows to make a report are: employees, self-employed workers, collaborators, freelancers, consultants, volunteers and trainees, paid and unpaid, who provide their services to RANCAN SRL; shareholders and persons with administrative, management, control, supervisory or representative functions, even if such functions are exercised by mere fact, at RANCAN SRL.

These individuals report information on violations of which they have become aware in the context of their work context.

Reports may also be made:

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

### **What can be reported?**

In general, violations of National law (such as criminal, civil, administrative or accounting illicit), violations of the organisation and management models provided in the Legislative Decree 231/2001, procedures, the Ethics Code (if adopted by the company), internal company regulations and/or in any case violations likely to cause damage or prejudice, even only to the image or reputation of the company:

- ✓ administrative, accounting, civil or criminal illicit;
- ✓ unlawful relevant conduct in accordance to Legislative Decree 8 June 2001, no. 231;
- ✓ illicit that fall within the scope of application of the acts of the European Union and the national law that implement them;
- ✓ acts or omissions that damage the financial interests of the European Union (for example: fraud, corruption and any other illegal activity connected to Union expenditure);
- ✓ acts or omissions related to the internal market (for example: violations of free competition and State aid);
- ✓ acts or behaviours which defeat the object or the purpose of the provisions of the European Union in the areas indicated in the previous points (for example, abusive practices that violate the protection of free competition).

By way of example and not limited to, violations or alleged violations of national or Community law must be reported relating to: accounting, tax 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 failures; corruption; negligence or conduct that may cause cases of corruption; violations of codes or policies adopted by the company, etc.

## How should the report be made through the internal reporting channel?

The report must be detailed and contain all the elements useful for the verification of the validity of the facts being reported, to allow the managing entity to proceed with the necessary checks. The report must not have defamatory content.

Essential elements are: the identification data of the reporting person (name, surname, place and date of birth), as well as a contact number to which subsequent updates can be communicated or the methods by which the reporting person wishes to be contacted; the circumstances of time and place in which the fact that is the subject of the report occurred; a clear and complete description of the facts that are the subject of the report, and in any case any other information that may be useful for checking the validity of the fact that is reported; the indication of any other person who may report the facts that are the subject of the report; the personal details or other elements that allow the identification of the person to whom the reported facts are to be attributed; any documents or elements that may confirm the validity of the facts reported.

The IT platform is made available to the reporting person at: <https://rancan.whistleblowing.qhub.it> and facilitates, through guided fields, the insertion of all the elements useful to allow the manager of the report to proceed with the checks and assessments on the validity of the facts that are the subject of the report.

Reports must be made in good faith and report facts of which the reporting person is aware, having reasonable grounds to believe that the information communicated is true.

Malicious reports or reports made with gross negligence may result in the application of the relevant sanctions (for example, disciplinary) by RANCAN SRL, without prejudice to the civil and criminal liabilities that may arise.

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

## What cannot be reported?

The following do not constitute whistleblowing reports: disputes, claims or requests related to a personal interest of the reporting person that concern exclusively the individual employment relationship, or inherent to the relationship with hierarchically superior figures (e.g. reports regarding labor disputes); communications or complaints relating to commercial activities or services to the public, and the so-called "corridor rumors".

## How to report?

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

- ✓ Portal/Software, reachable at: <https://rancan.whistleblowing.qhub.it>
- ✓ Voice recording (on a registered message/voice box) in the Portal/Software which will be made unrecognizable)
- ✓ Direct meeting (upon request) with the FAIV – FEDERAZIONE ARTIGIANI IMPRENDITORI VICENTINI reporting manager, in the person of Eng. Marco Zanchin at the headquarters of Confartigianato Vicenza, Via E. Fermi 134, 36100 Vicenza, by calling 0444392300 during office hours.

The Instructions for use of the Portal/Software as well as the Privacy Policy related to the processing of personal data can be viewed by connecting to the address mentioned above. the reporting person is informed of the receipt of the report and of the results of the investigations carried out in this regard.

## Are anonymous reports allowed?

Reports from which it is not possible to determine the identity of the reporting person are considered anonymous. Anonymous reports, if detailed, are treated as ordinary reports and are consequently treated in accordance with the provisions of this procedure.

In the case of anonymous reports, the protections that the law provides for the reporting person cannot be activated. In any case, the anonymous reporting person, if subsequently identified, will be able to benefit from the protection that the law ensures in the event of any retaliation or discrimination against him (see next paragraph).

## How is the reporting person protected?

In all the reporting process, RANCAN SRL guarantees the confidentiality of the whistleblower, in compliance with the legislative provisions. RANCAN SRL prohibits (and sanctions) any form of retaliation or discrimination (direct or indirect, active or omissive, even if only threatened or attempted) against the whistleblower, as a consequence of his/her report. These behaviors (retaliatory or discriminatory) will be subject to disciplinary sanctions.

RANCAN SRL also guarantees the protection of third parties connected to the whistleblower (relatives, colleagues, legal entities of which the whistleblowers are owners or for which they work, facilitators) who operate in a work context connected to RANCAN SRL. A facilitator is defined as someone who assists the whistleblower in the process of making the report, operating within the same work context and whose assistance must be kept confidential.

## Data retention times

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