



ERRECOM SPA, in compliance with the provisions of the law and with a view to guaranteeing correctness and transparency in the conduct of its business, it has set up a "Whistleblowing" computer system, available to anyone who wants to report situations relevant to the purposes of the law or internal regulations. With the present document, we indicate the path to follow to make the report. For the operating modes, the video tutorial made available by the system manager will be sent to you together with the access credentials in the first communication, as indicated below.

CHARACTERISTICS OF THE REPORT

The report must refer solely to illegal conduct, i.e. conduct that constitutes non-compliance and/or violation of applicable legislation and/or internal procedures and regulations. Therefore, reports concerning complaints, personal requests or, more generally, circumstances not relevant to may not be taken into consideration. In particular, the following reports will be archived:

- reports relating to matters of a purely operational and/or organizational nature,
- complaints of a personal character;
- claims/requests relating to the regulation of individual employment relationships, unless the reported conduct is carried out in violation of the applicable legislation and/or internal procedures and regulations.

The reports must be made in good faith, detailed and based on precise and concordant factual elements, also in order not to waste the effectiveness of the tool made available to you. Anyone who willfully or grossly negligent makes reports which subsequently turn out to be unfounded may be subject to disciplinary sanctions.

MANAGEMENT OF THE REPORTS

In order to protect as much as possible the "whistleblower" and the "signaled person", security measures have been adopted: regardless of the choice made by the "whistleblower" to make an anonymous or non-anonymous report (as indicated in the following point 6), confidentiality of the whistleblower identity of the content of the report are guaranteed through secure protocols and cryptographic tools that protect personal data and information provided. The identity of the whistleblower is never disclosed without his consent, with the exception of the cases provided for by current legislation. The competent body for the management of reports is:

- The Human Resources Manager;

- The President of the Board of Auditors, as Reserve Manager, in the event of reports that concern the Human Resources Manager or in respect of which the latter has a potential interest connected to the report, such as to compromise his impartiality and independence of judgment.

In addition to the information provided, we invite you to read the "whistleblowing" procedure issued by the Company.

HOW TO SUBMIT A REPORT

1. Access the link <https://areariservata.mygovernance.it/#!/WB/ERRECOM/> filling in the form inserting name, surname and e-mail address
2. Follow the instructions received with the e-mail containing the Login Unique Credentials
3. Log in to your account with your credentials
4. From the drop-down menu in the upper right-hand corner, select the "REPORT A VIOLATION" option
5. Proceed by clicking the "CREATE REPORT" button
6. It will be possible to proceed with the report
 - (a) anonymously ticking the relevant box:
 - (b) or, in a non-anonymous form, but in any case, with the guarantees of confidentiality required by law
7. Once the reporting method has been established, the whistleblower will proceed by completing the form. The fields marked with the symbol * are mandatory. Some fields have an open text option and must have a minimum number of characters.

ALTERNATIVE REPORTING METHODS TO USING THE PLATFORM

Alternatively, the report can be presented by delivery of a paper communication to the Human Resources Manager or to the President of the Board of Auditors, as Reserve Manager (in the cases indicated above) or by communication sent by email, to the address indicated below: whistleblowing@errecom.com.

EXTERNAL SIGNALING

It is also possible to make a report using the external channel, activated and managed by the National Anti-Corruption Authority (ANAC), but only upon the occurrence of the conditions strictly indicated in the art. 7 of Legislative Decree 24/2023, and so when:

- the whistleblower has already made an internal report and it has not been followed up by the designated person or office;

- the whistleblower has reasonable grounds to believe, on the basis of documented or documentable concrete circumstances, that if he/she made an internal report, it would not be followed up effectively or
 - the whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.
- The instructions relating to the methods of submitting these reports are published on the ANAC website, in the section dedicated to the so-called. Whistleblowing.

PUBLIC DISCLOSURE

Lastly, it is possible to publicly disclose information on violations, making them public domain, only upon the occurrence of the conditions strictly indicated in the art. 15 of the Legislative Decree. 24/2023 and so when:

- the whistleblower has previously made an internal and external report or has directly made an external report, under the conditions above indicated and has not received feedback within the legal deadlines;
- the whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- the whistleblower has reasonable grounds 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 in which evidence may be hidden or destroyed or in which there is well-founded fear that the person receiving the report may be colluding with the perpetrator of the violation or involved in the violation itself.

For any further questions or clarifications, please do not hesitate to contact your company manager.

Yours sincerely.

