

## POLICY DI WHISTLEBLOWING

RUBINETTERIE  
**treemme**  
*instruments for water*

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## **1. Preamble**

On 29 December 2017, law no. 179 "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship" (published in the Official Gazette, General Series no. 291 of 14 December 2017) came into force. The structure of the provision distinguishes the regulation of the public sector (art. 1) from that of the private one (art. 2), and the provision on the obligation of official, corporate, professional, scientific and industrial secrecy has been integrated (art. 3).

As regards the private sector, article 2 of law no. 179/17 intervened on Decree 231/2001 and added a new provision in article 6 ("Persons in top positions and organisation models of the institution") which also included it within the scope of the Organizational Model pursuant to Italian Legislative Decree. 231/01 measures related to the presentation and management of reports.

Subsequently, on 10 March 2023, Legislative Decree no. 10 March 2023 Nr. 24 was published in the Official Journal (hereinafter the "Decree"), implementing the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, concerning the "protection of persons who report violations of national or the European Union that harm

public interest or the integrity of public administration or of the private body, of which they became aware in a public or private scenario" (hereinafter the "Directive").

In summary, the new rules provide for:

- the obligation, for all private entities with more than 50 employees, to establish internal reporting channels;
- the possibility, not only for employees but also for the other subjects indicated by the art. 4 of the Directive to report violations of Union law in various sectors, including: i) public procurement; ii) financial services, products and markets and prevention of money laundering and terrorist financing; iii) product safety and conformity; iv) transport safety; v) environmental protection; etc.);
- the activation of reporting channels that are "designed, implemented and managed in a secure manner and such as to guarantee the confidentiality of the identity of the person making the report and the protection of any third parties mentioned in the report and to prevent access by staff not allowed"; and which include "a notice of receipt of the report to the reporting person within seven days of receipt";
- the need to designate impartial parties for the reception and management of reports;
- the obligation to provide final feedback to the reporter within 90 days;
- the obligation to adopt the necessary measures to prohibit any form of retaliation against people who report violations;
- the possibility for interested parties to resort, in certain cases, to "external" reporting to the ANAC and to "disclosure" of the report;
- the need to provide interested parties with clear information on the reporting channel, procedures and conditions for carrying out "internal" and "external" reports (the information must be displayed and made easily visible in the workplace as well as accessible to people who, although by not frequenting the workplace they maintain legal relationships with the entity in one of the forms provided for by the Decree).

The structures of Rubinetterie Treemme SRL (hereinafter "Rubinetterie 3M"), in the intent to provide concrete application to current legislation, make different reporting channels available to whistleblowers, including a dedicated portal - "Whistleblowing Portal" - suitable to guarantee, with IT

modalities, the confidentiality of the identity of the whistleblower in their management activities.

## **2. Purpose of the Policy and recipients**

This Whistleblowing Policy (hereinafter "Policy") aims to regulate the process of receiving, analysing and processing "internal" reports, sent and transmitted by anyone, even anonymously.

This Whistleblowing Policy (adopted after having heard the union representatives where established pursuant to art. 4, 1st paragraph, Legislative Decree no. 24/2023) is adopted by Rubinetterie 3M. In particular, the recipients (hereinafter also referred to as only "recipients") of this procedure are:

- the top management and members of the corporate bodies of Rubinetterie 3M;
- the employees;
- the partners, customers, suppliers, consultants, collaborators and, more generally, anyone with a relationship of interest with Rubinetterie 3M.

The "reporting person" [ex art. 2, paragraph 1, letter. g), Italian Legislative Decree no. 24/23 - "Reporter"] aware of facts potentially subject to reporting is invited to promptly report using the methods described below, refraining from undertaking independent analysis and/or in-depth initiatives.

## **3. Definitions**

For the purposes of this policy, the following definitions apply:

«**ANAC**»: Autorità Nazionale Anticorruzione (National Anti-Corruption Authority);

«**work context**»: work or professional activities, present or past, carried out in relation to the relationships referred to in article 3, paragraphs 3 or 4 of the Italian Legislative Decree. 24/2023, within which, regardless of the nature of the same activity, a person acquires information on violations and in respect of which they could risk suffering retaliation in the event of reporting or public disclosure or reporting to the judicial or accounting authority;

«**public disclosure**»: the release to the public domain of information on violations through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people;

«**facilitator**»: the natural person who assists a reporting person in the reporting process, operating within the same work context about whose assistance confidentiality must be maintained;

«**information on violations**»: information, including well-founded suspicions, regarding violations committed or which, on the basis of concrete elements, are believed to be committed, concerning the context of the Entity with which the reporting party has a legal relationship pursuant to art. 3, paragraph 1 or 2 of Italian Legislative Decree 24/2023 as well as the elements regarding conduct aimed at concealing such violations;

"**person involved**" or "**reported**": the natural or legal person mentioned in the report as the person to whom the violation is attributed or as the person in any case implicated in the reported violation;

«**reporter**»: the natural person who reports the violations acquire within his/her work context;

«**Reporting manager**»: the specifically trained independent external entity responsible for managing the reporting channel;

«**feedback**»: communication to the reporting person of information relating to the management of the report;

«**retaliation**»: any behaviour, act or omission, even if only attempted or stated in threat, carried out as a result of the report, which causes or may cause the reporter, directly or indirectly, unjust damage;

«**report**»: the communication made in written or oral form through the channels indicated in the violation information policy;

«**external reporting**»: the communication of information on violations, presented through the external reporting channel referred to in art. 7 of the Italian Legislative Decree. 24/2023;

«**internal reporting**»: the communication, written or oral, of information on violations, presented through the internal reporting channels referred to in art. 4 of the Italian Legislative Decree. 24/2023;

«**investigation**»: the process relating to the management of the report undertaken by the Report Manager to evaluate the existence of the facts reported, the outcome of the investigations and any measures adopted;

«**violations**»: behaviours, acts or omissions that damage the public interest or the integrity of the public administration or private entity and which consist in violation of national and European legislation, as indicated in detail in the following paragraph.

## **4. Reporting/Whistleblowing**

"Whistleblowing" means any report, submitted to protect the integrity of the Company, of irregularities, civil, administrative, criminally illicit conduct or violations referable to an ethical/conduct code adopted as well as to the internal procedures adopted by Rubinetterie 3M or to the discipline external, however applicable to Rubinetterie 3M, which are based on precise and consistent factual elements, of which the Recipients have become aware due to the functions performed. Reports must be made in good faith and must be substantiated with precise information so as to be easily verifiable.

Generally speaking, Rubinetterie 3M urges its employees to resolve any work disputes, where possible, through dialogue, even informal, with their colleagues and/or with their direct manager.

Reports must be made with the priority of responsibility in mind, be of interest to the common good, and fall within the types of non-compliance for which the system was implemented.

### **4.1. Reporting channels**

The Reporter must promptly report any violation, or reasonable suspicion of violation, through the channels indicated in the Policy.

Reports must be transmitted via the following channels:

1. paper mail: registered letter addressed to the Reporting Manager, Lawyer. Mirella Rechichi and made out to "Manager of whistleblowing reports Rubinetterie 3M" to be sent to the following address: Piazza della Libertà n. 9, 50129 – Firenze at Studio BL, with the specification that this is "confidential" correspondence;
2. Whistleblowing portal that Rubinetterie 3M has set up, the link of which (<https://whistleblowersoftware.com/secure/9ad86abf-9263-4789-839a-1077c583629b>) can be found on the company website.

Anyone who receives a report outside the aforementioned channels is required to transmit it without delay via the channels.

The reports transmitted via channel no. 1 (registered letter addressed to the Reports Manager, Lawyer. Mirella Rechichi and registered to "Gestore delle segnalazioni whistleblowing Rubinetterie 3M (Whistleblowing

reports Manager)” to be sent to the following address: Piazza della Libertà n. 9, 50129 – Firenze at Studio BL) are received by the Report Manager.

The reports transmitted via channel no. 2 (Whistleblowing Portal which Rubinetterie 3M has equipped itself with) are received by the Reports Manager.

Reports may also be made orally to the subject as outlined above.

Internal reports in oral form can be made:

- i. through the portal, via a specific voice recording function with the ability to alter the voice of the reporter, should the latter wish to make an anonymous and not just confidential report;
- ii. through a telephone line (traceable on 055 483448) through which you can request to speak directly with the Reports Manager;
- iii. at the request of the reporting person, through a direct meeting requested by the Reporting Manager, and set by the latter within a reasonable time in a place, necessarily different from the premises of Rubinetterie 3M, which will be previously agreed with the reporting party, favouring their needs. Subject to the consent of the reporting party, the Manager will draw up minutes of the meeting which the reporting party verifies, rectifies and confirms by signing. The minutes of the meeting, the report with any supporting documentation and any other communication are kept in a safe place, accessible only to the Reports Manager.

#### **4.2. Contents of reports**

The reports must be as detailed as possible in order to allow the necessary checks. By way of example, a report should contain the following items:

- the personal details of the person making the report (where the report is confidential and non-anonymous), with indication of the organizational unit to which he or she belongs and/or the activity carried out for Rubinetterie 3M;
- a clear and complete description of the facts being reported and the circumstances of time and place in which the facts took place;



- items that allow the identification of the person who committed the reported facts;
- any other parties who can report on the facts covered by the report;
- any documents that can confirm the validity of the facts reported.

The reports cannot concern complaints of a personal nature or claims/requests that fall within the discipline of the employment relationship or relations with the hierarchical superior or with colleagues, for which reference must be made to the various communication channels made available by Rubinetterie 3M.

Any detailed anonymous reports (containing all the objective elements necessary for the subsequent verification phase) will be taken into consideration for further investigation.

Any reports received and deemed irrelevant will be archived without further investigation, without prejudice to the feedback to the interested party which must be provided within the deadlines set by the Italian Legislative Decree. 24/23.

#### **4.3. Report Management**

The Report Manager, once the report has been received, will provide the reporter - via the IT platform - with the acknowledgement of receipt within 7 (seven) days and will subsequently manage the report itself. The Manager then shall verify whether the report falls within the subjective and objective scope of application of the Italian Legislative Decree. 24/2023. Ultimately, where the report falls outside the scope of application of the aforementioned Legislative Decree, the Reports Manager archives the report, communicating this to the reporter via the IT platform.

If the report falls within the scope of application of the aforementioned Legislative Decree, but is not sufficiently detailed, the Report Manager, via the platform, will formulate the appropriate requests for additions/clarifications to the reporter.

The reports are subject to the following investigation process, aimed at ascertaining the facts reported.

#### **4.4. Investigation**

##### Preliminary phase:

The Manager undertakes to provide an initial response to the reporting party within a reasonable timeframe and, in any case, no longer than 90 days (3 months) from the date of issue of the acknowledgement of receipt.

The reports will be subject to preliminary analysis in order to verify the presence of data and information useful for assessing their validity.

In carrying out the aforementioned analysis, the Manager may request further information or documentation from the reporting party and may avail itself, for specific aspects covered in the reports and if deemed necessary, of the support of the company functions and/or external professionals. The Manager may also acquire information from the people involved in the report, who also have the right to request to be heard or to produce written observations or documents. If at the end of this preliminary phase the absence of sufficiently detailed elements or the unfoundedness of the facts cited emerges, the report will be archived with the relevant reasons.

Where, following this phase, useful and sufficient elements emerge or can be deduced to evaluate the report as valid, the next phase of specific investigations will be started.

##### Specific insights:

The Reports Manager shall:

- i. start specific analyses making use, if deemed appropriate, of the competent structures of the Company or of external experts and experts;
- ii. notify the person involved of the existence of the report, in order to protect their right of defence, always guaranteeing confidentiality regarding the identity of the reporter and of the other people involved and/or mentioned in the report;
- iii. access all company data and documents useful for the purposes of the investigation, where deemed appropriate for the correct management of the case;
- iv. agree with the management responsible for the function affected by the report, any "action plan" necessary to remove the control "weaknesses"

- detected;
- v. agree with the functions involved on any initiatives to be undertaken to protect the interests of the company (e.g. judicial initiatives, suspension/cancellation from the supplier register, etc.). The corporate functions involved must guarantee full collaboration to the Manager as necessary to carry out the investigation, in compliance with the principles and guarantees provided for by the legislation;
  - vi. request, if possible, the initiation of disciplinary proceedings against the whistleblower, in the case of reports in relation to which the bad faith of the whistleblower and/or the purely defamatory intent are ascertained, possibly also confirmed by the unfoundedness of the report itself.

The activities described above are not necessarily carried out in a sequential manner.

Conclusion of the investigation:

Upon completion of the investigation, the Manager will provide written feedback to the reporting party:

- i. Where it finds items of sure unfoundedness in the report, it will proceed with the duly motivated dismissal. If the Manager considers the report to have been made for the sole purpose of harming the reputation or damaging or otherwise causing prejudice to the person reported, it will communicate this to the administrative body of Rubinetterie 3M so that any appropriate initiative is activated against the person making the report.
- ii. Should the report be fully and undoubtedly founded, the Manager prepares a summary report on the results of the investigations and the reasons that led to the report being deemed to be founded, which will be sent to the administrative body to take the measures deemed necessary. At the same time, the Manager will inform the reporter of the outcome of the report.

The activities described above necessarily take place within 90 days of issuing the notice of acceptance of the report. The feedback can also be merely interlocutory, since information relating to the investigative activities that the Reporting Manager has intended to undertake and the progress of the investigation can be communicated. Once the investigation is completed, the results must still be communicated to the reporting party.

## **5. Protection and responsibility of the Reporter**

By valuing the good faith and correctness of the whistleblower at the time of the report, the same will benefit from the protections exclusively in the event that, at the time of the report, he had well-founded and reasonable grounds to believe that the information on the violations reported, disclosed publicly or reported were true.

In this case, it is expressly forbidden to reveal the identity of the reporting person (to be understood as also extending to all those elements contained in the report from which the identification of the same can be deduced, even indirectly) with the exception of the Report Manager and the content of the report is deprived of access to administrative documents as well as the right of generalized civic access.

This protection is also guaranteed in any criminal, accounting and disciplinary proceedings that may result from the report.

The identity of the people involved and mentioned in the report is also protected. No retaliation or discrimination, direct or indirect, even in an attempted or threatened form, can result from anyone who has made a report in good faith. Any discrimination or retaliation that may be implemented will be declared null and void by the judicial authority.

In the context of any judicial or administrative proceedings or extrajudicial disputes having as their object the verification of behaviours, acts or omissions prohibited pursuant to the Decree, the burden of proof is reversed and will therefore be placed on the person who has put in place the aforementioned behaviors, acts or omissions. The reversal of the burden of proof does not operate in favor of persons and entities other than the reporting person referred to in the art. 5, paragraph 3 (e.g. facilitators, colleagues). Anyone who, in response to the report, reveals or disseminates information on violations that are:

- i. Covered by the obligation of secrecy;
- ii. Related to the protection of copyright;
- iii. Related to the protection of personal data;
- iv. Such as to offend the reputation of the person involved or reported.

This justification operates where *"at the time of disclosure or dissemination, there were reasonable grounds to believe that the revelation or dissemination of the same information was necessary to reveal the violation and the reporting, public disclosure or complaint to the judicial or accounting authority was carried out in the required manner"*.

In such cases, any further liability, whether of a civil or administrative nature, is also excluded.

Unless the fact constitutes a crime, liability, even of a civil or administrative nature, for the acquisition of information on violations or for access to them is also excluded.

Furthermore, sanctions are envisaged against anyone who violates the whistleblower's protection measures, just as sanctions are envisaged against the whistleblower, in the case of reports made with malice or gross negligence or which turn out to be false, unfounded, with defamatory or in any case carried out for the sole purpose of damaging the Company, the reported party or other subjects affected by the report. The same measures are extended to facilitators, to people from the same working context as the whistleblower or the complainant who are linked to him or her by a stable emotional or kinship bond within the fourth degree, to the work colleagues of the reporting person or the complainant who work in the same working context and who have a usual and current relationship with it, to the entities owned by the reporting person or the complainant or for which the same person works as well as to the entities that operate in the same working context as the reporting person or the complainant. The whistleblower who believes he or she has incurred retaliation as a result of the report can communicate it to ANAC.

Without prejudice to the administrative pecuniary sanctions under the jurisdiction of ANAC, if it ascertains that retaliation has been committed, Rubinetterie 3M may take disciplinary measures against the person responsible.

By way of example, retaliation includes, among others:

- a) dismissal, suspension or equivalent measures;
- b) demotion or failure to promote;
- c) the change of functions, the change of place of work, the reduction of salary, the modification of working hours;
- d) the suspension of training or any restriction of access to it;
- e) the negative merit notes or negative references;
- f) the adoption of disciplinary measures or other sanctions, including pecuniary ones;

- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavourable treatment;
- i) the failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;
- j) failure to renew or early termination of a fixed-term employment contract;
- k) damage, including to the person's reputation, in particular on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income;
- l) improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- m) the early termination or cancellation of the contract for the supply of goods or services;
- n) the cancellation of a license or permit;
- o) the request to undergo psychiatric or medical tests.

## **6. Protection of the Party Reported**

The report is not sufficient to initiate any disciplinary proceedings against the reported person. If, following concrete evidence acquired regarding the report, investigations are performed, the reported party may be contacted and will be guaranteed the opportunity to provide any necessary clarification.

## **7. Support measures**

The support measures consist of free information, assistance and consultancy regarding reporting methods and protection against possible retaliation offered by national and European legislation; about the rights recognized to the subjects involved in the report; regarding the methods and conditions of access to legal aid at state expense.

In this sense, *"the list, published by ANAC on its website, contains the third sector bodies that carry out, according to the provisions of the respective statutes, the activities referred to in article 5, paragraph 1, letters v) and w), of legislative decree 3 July 2017, n. 117, and who have stipulated agreements with ANAC"*.

## **8. Report transmission method**

### **8.1 The Whistleblowing Portal**

The Whistleblowing Portal, referred to in art. 4 co. 1 of Italian Legislative Decree no. 24/23, can be reached via the link (<https://whistleblowersoftware.com/secure/9ad86abf-9263-4789-839a-1077c583629b>) found on the Rubinetterie 3M website. Access to the Whistleblowing Portal is subject to the "no-log" policy in order to prevent the identification of the whistleblower who intends to remain anonymous: this means that the company IT systems are not able to identify the point of access to the portal (address IP) even if access is made from a computer connected to the company network. Reports transmitted via the Whistleblowing Portal, whether written or oral and in the language chosen by the whistleblower, are received and managed by the Reports Manager.

The personal data contained in the database is encrypted using dedicated and different encryption keys. Consultation of the information present in the platform is permitted only to the Report Manager, enabled with specific functional profiles for access to the system, traced through logs.

With reference to written reports, the reporting party, after choosing whether to make a confidential or anonymous report, must indicate a brief description of the facts reported and of the subjects involved in the report. The reference category of the reported violation must therefore be chosen and any documents (e.g. PDF, images, videos) that may be held by the reporter must be attached that are suitable to support the report itself.

With reference to the oral report, the person making the report will click on the appropriate box to start recording the voice message and, at the end of the recording, will be able to choose the option of distorting his/her voice in order to make the report anonymous. Even in this case, the reference category of the reported violation must be chosen and any documents (e.g. PDF, images, videos) possibly in the possession of the reporting person suitable to support the report itself will be attached.

**Upon entering the report, the reporting party will be issued an access code which they must keep** in order to:

- Have access to the report made;
- Monitor its progress;
- Communicate with the Report Manager;
- Insert further elements to substantiate the report;
- View the status of the report;
- Submit additional documents relevant to reporting;
- Send new messages – both in written and oral form – to the Report Manager.

**The reporting party shall keep the aforementioned code since it cannot be recovered if lost.**

The Report Manager will be provided with a password to access the Portal and, in the event of entering reports, he will receive an alert on his email address or mobile phone depending on the method chosen by him. The reports, once received by the Manager, are subject to the investigation process already described in paragraph 4.4.

## **8.2 Hard copy (paper)**

With reference to the written form on paper, the reporting party shall send, to the address indicated in paragraph 4.1, the written report and placed inside a closed envelope, which in turn shall contain an additional closed envelope in which the reporter's data will be inserted along with a copy of their identity document. The report must necessarily contain an email address or a paper mail address to which the Report Manager can send the relevant communications. In the absence of this procedure, the paper report will be considered inadmissible.

## **9. External reporting**

### **9.1. Conditions for making external reporting**

The reporting party can make an external report - reachable at the URL <https://whistleblowing.anticorruzione.it/#/> - if, at the time of its submission, one of the following conditions applies:



- a) within his/her work context, the mandatory activation of the internal reporting channel is not foreseen or this, even if mandatory, is not active or, even if activated, does not comply with the provisions of article 4;
- b) the reporting person has already made an internal report pursuant to Article 4 and it has not been followed up on;
- c) the reporting person has reasonable grounds to believe that, if he/she made an internal report, it would not be followed up effectively or that the same report could lead to the risk of retaliation;
- d) the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

## **9.2. External reporting channels**

The National Anti-Corruption Authority (ANAC) activates an external reporting channel that guarantees, also through the use of encryption tools, the confidentiality of the identity of the reporting person, the person involved and the person mentioned in the report, as well as the content of the report and related documentation. The same confidentiality is also guaranteed when the report is made through channels other than those indicated in the first sentence or reaches personnel other than those responsible for processing the reports, to whom it is in any case transmitted without delay.

External reports are made in written form via the IT platform or in oral form via telephone lines or voice messaging systems or, at the request of the reporting person, through a direct meeting set within a reasonable time.

The external report presented to a person other than the ANAC is transmitted to the latter within seven days from the date of its receipt, giving simultaneous notice of the transmission to the reporting person.

## **10. Public disclosure**

The Decree provides that the whistleblower can submit information on violations public domain through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people. The reporting person who makes a public disclosure benefits from the protection provided by the Decree if, at the time of the public disclosure, one of the following conditions applies:

- a) the reporting person has previously made an internal and external report or has directly made an external report, under the conditions and with the methods set out in this Policy and has not received feedback on what was reported;
- b) the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- c) the reporting person 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 case at hand, 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.

## **11. Periodic report**

The Reports Manager provides the Administrative Body, on an annual basis, with a summary report of all the reports received, whether anonymous or confidential. This report contains the preliminary investigation process followed as well as the outcome of the analyses made.

## **12. Sanctions**

Sanctions are envisaged against anyone who violates the whistleblower's protection measures, just as sanctions are envisaged against the whistleblower, in the case of reports made with malice or gross negligence or which turn out to be false, unfounded, with defamatory or in any case carried out for the sole purpose of damaging the Company, the reported party or other subjects affected by the report. Without prejudice to the other aspects of responsibility, ANAC applies the following administrative pecuniary sanctions to the person responsible:

- a) from 10,000 to 50,000 Euro when it ascertains that retaliation has been committed or when it ascertains that the reporting has been hindered or that an attempt has been made to hinder it or that the confidentiality obligation referred to in article 12 has been violated;
- b) from 10,000 to 50,000 Euro when it ascertains that no reporting channels have been established, that procedures for making and managing reports have not been adopted or that the adoption of such procedures does not comply with those referred to in articles 4 and 5, as well as when it ascertains that the verification

and analysis of the reports received has not been carried out;  
c) from 500 to 2,500 Euro, in the case referred to in article 16, paragraph 3, unless the reporting person has been convicted, even in first instance, for the crimes of defamation or slander or in any case for the same crimes committed with the report to the judicial or accounting authority.

With reference to any further sanctions internal to the company context:

- Rubinetterie 3M employees will be subject to the sanctions provided for by the employment contracts and by the applicable pro tempore National Collective Labor Agreement (or comparable document).

Where Rubinetterie 3M decides to equip itself and adopt a Disciplinary System:

- the employees of Rubinetterie 3M and the members of the administrative and supervisory bodies will be subject to sanctions as provided for in the disciplinary system adopted by the organisation;
- people who deal with Rubinetterie 3M other than the parties mentioned above will incur the sanctions provided for in the contracts stipulated with them.

The sanction is imposed by the competent bodies from time to time, regardless of the initiation of proceedings by the Judicial Authority.

In any case, the right to be heard is guaranteed.

### **13. Conservation of documentation and protection of privacy**

In order to guarantee the management and traceability of reports and related activities, the Report Manager takes care of archiving all the documentation supporting the report for a period of 5 years from the closure of the report.

Any particular data contained in the report, including those relating to the identity of the reporter or other individuals, will be processed in compliance with the rules for the protection of personal data and the GDPR Policy adopted by Rubinetterie 3M.

### **14. Policy update**

The Policy and the functionality of the Portal will be subject to periodic review by the Reporting Manager in agreement with the Administrative Body in order to guarantee constant alignment with the relevant legislation.