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REGULATION FOR THE MANAGEMENT OF WHISTLEBLOWING REPORTS AND PROTECTION OF THE WHISTLEBLOWER



Sommario

Legal framework	3
Art. 1 Object.....	3
Art. 2 Definitions	4
Art. 3 Protected Subjects	5
Art. 4 Internal Reporting.....	6
Art. 5 Management of the Internal Reporting Channel - Procedure	8
Art. 6 Anonymous Reports	9
Art. 7 External Reporting - Conditions	9
Art. 8 Confidentiality Obligation.....	10
Art. 9 Processing of Personal Data.....	11
Art. 10 Conservation of Documentation Concerning Reports	11
Art. 11 Public Disclosures	11
Art. 12 Conditions for the Protection of the Whistleblower	11
Art. 13 Prohibition of Retaliation.....	12
Art. 14 Limitations of Liability	13
Art. 15 Further Provisions.....	14
Art. 16 Entry into Force	14



Legal framework

The introduction into national legislation of a system for managing reports and adequate protection of employees who report unlawful conduct within the work environment is provided for in international conventions (UN, OECD, Council of Europe) ratified by Italy, as well as in recommendations of the Parliamentary Assembly of the Council of Europe.

In particular, Law No. 190 of November 6, 2012, with Article 1, paragraph 51, introduced Article 54-bis within Legislative Decree No. 165/2001, pursuant to which a measure aimed at promoting the emergence of cases of wrongdoing, known in Anglo-Saxon countries as *whistleblowing*, was provided.

With the Regulation for the management of reports and the exercise of sanctioning powers in matters of protection of authors of reports of wrongdoing or irregularities of which they have become aware within the framework of an employment relationship pursuant to Article 54-bis of Legislative Decree No. 165/2001, ANAC has defined further operational provisions in this regard.

The European Union subsequently issued Directive 2019/1937 concerning the protection of persons reporting breaches of Union law, in order to create a minimum standard for the protection of the rights of *whistleblowers* in all Member States.

Italy implemented the European Directive with Legislative Decree No. 24 of March 10, 2023.

With the adoption of this Regulation, the company Crippa Campeggio S.r.l. (hereinafter also Crippa Campeggio) - "private sector entity" pursuant to Article 2, paragraph 1, letter q), number 1) of Legislative Decree 24/2023 - intended to comply with the aforementioned legislative provisions, as well as with the guidelines provided by the P.N.A. and by ANAC.

The purpose of this document is as follows:

- to clarify the guiding principles of the institution, highlighting the rules that Crippa Campeggio must observe;
- to specify the procedures for managing reports;
- to detail the methods followed to protect the confidentiality of the identity of the reporting person, the content of the report, and the identity of any individuals mentioned.

The purpose of this Regulation is therefore to remove factors that may discourage or hinder the use of the institution, such as doubts and uncertainties about the procedures to be followed and fears of retaliation or discrimination. The objective is to provide the *whistleblower* with clear operational instructions regarding the subject matter, content, recipients, and transmission methods of reports, as well as regarding the forms of protection offered to them in our legal system.

The process for managing reports guarantees the confidentiality of the reporting person's identity from the moment of receipt and in all subsequent contacts. However, in the case of anonymous reports and *whistleblowers* who do not express a willingness to disclose their identity, Crippa Campeggio may encounter difficulties in fully guaranteeing and implementing the protection and tools provided by the *whistleblowing* institution in the interest of the *whistleblower*.

Art. 1 Object

This Regulation governs the protection of individuals who report violations of national or European Union regulations - of which they become aware in the context of their work - that harm the public interest or the



integrity of Crippa Campeggio S.r.l.

The regulatory provisions do not apply to:

- a. disputes, claims, or requests related to a personal interest of the reporting person or the person who has lodged a complaint with the judicial or accounting authority that exclusively concern their individual employment relationships, or are related to their hierarchical relationships;
- b. reports of violations already mandatory under the acts of the European Union or national acts indicated in Part II of the annex to Legislative Decree No. 24 of March 23, 2023, or national acts that implement acts of the European Union indicated in the annex to Directive (EU) 2019/1937, even if not indicated in the aforementioned annex, concerning the following sectors: public procurement; financial services, products, and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data and security of networks and information systems;
- c. reports of violations concerning national security.

The provisions regarding the exercise of workers' right to consult their representatives or trade unions, protection against unlawful conduct or acts carried out as a result of such consultations, the autonomy of social partners and their right to conclude collective agreements, as well as repression of anti-union conduct pursuant to Article 28 of Law No. 300 of May 20, 1970, remain applicable.

Art. 2 Definitions

For the purposes of this regulation, the following terms shall mean:

- a. **"violations"**: behaviors, acts, or omissions that harm the public interest or the integrity of Crippa Campeggio S.r.l. and consist of:
 1. administrative, accounting, civil, or criminal offenses that do not fall under numbers 3), 4), 5), and 6);
 2. relevant unlawful conduct under Legislative Decree No. 231 of June 8, 2001, or violations of the organizational and management models provided therein, which do not fall under numbers 3), 4), 5), and 6);
 3. offenses falling within the scope of application of the acts of the European Union or national acts indicated in the annex to Legislative Decree No. 24 of March 23, 2023, or national acts that implement acts of the European Union indicated in the annex to Directive (EU) 2019/1937, even if not indicated in the aforementioned annex, relating to the following sectors: public procurement; financial services, products, and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data and security of networks and information systems;
 4. acts or omissions that harm the financial interests of the Union specified in Article 325 of the Treaty on the Functioning of the European Union as specified in the relevant Union derivative law;
 5. acts or omissions concerning the internal market, referred to in Article 26, paragraph 2, of the Treaty on the Functioning of the European Union, including violations of Union competition and state aid rules, as well as violations concerning the internal market related to acts violating corporate tax rules or mechanisms aimed at obtaining a tax advantage that undermines the



- object or purpose of the applicable corporate tax rules;
6. acts or behaviors that undermine the object or purpose of the provisions of the Union in the sectors referred to in numbers 3), 4), and 5);
- b. **"information on violations"**: information, including well-founded suspicions, concerning violations committed or that, on the basis of concrete elements, could be committed within Crippa Campeggio S.r.l. as well as elements concerning conduct aimed at concealing such violations;
 - c. **"reporting"** or **"to reporting"**: the communication, written or oral, of information on violations;
 - d. **"internal reporting"**: the communication, written or oral, of information on violations, submitted through the internal reporting channel referred to in Article 4;
 - e. **"external reporting"**: the communication, written or oral, of information on violations, submitted through the external reporting channel referred to in Article 7;
 - f. **"public disclosure"** or **"publicly disclose"**: making information on violations public through the press or electronic means or through dissemination means capable of reaching a large number of people;
 - g. **"reporting person"** (also: *"whistleblower"*): the natural person who makes the report or public disclosure of information on violations acquired within their work context;
 - h. **"facilitator"**: a natural person who assists a reporting person in the reporting process, operating within the same work context and whose assistance must be kept confidential;
 - i. **"work context"**: work or professional activities, current or past, carried out within the framework of the relationships referred to in Article 3, through which, regardless of the nature of such activities, a person acquires information on violations and within which they may risk retaliation in the event of reporting or public disclosure or reporting to the judicial or accounting authority;
 - j. **"involved person"**: the natural or legal person mentioned in the internal or external report or in the public disclosure as the person to whom the violation is attributed or as the person otherwise involved in the reported or publicly disclosed violation;
 - k. **"retaliation"**: any behavior, act, or omission, even only attempted or threatened, carried out because of the report, reporting to the judicial or accounting authority, or public disclosure and that causes or may cause unfair harm to the reporting person or the person who made the complaint, directly or indirectly;
 - l. **"follow-up"**: the action taken by the entity responsible for managing the reporting channel to assess the existence of the reported facts, the outcome of the investigations, and any measures taken;
 - m. **"feedback"**: communication to the reporting person of information concerning the follow-up given or intended to be given to the report.

Art. 3 Protected Subjects

In the case of reports, complaints to the judicial or accounting authority, public disclosure of information on violations known within the framework of their work context, the provisions of this Regulation apply, in particular:

- a) to employees of Crippa Campeggio;
- b) to holders of a collaboration relationship, pursuant to Article 2 of Legislative Decree No. 81 of 2015, who carry out their work at the company;
- c) to workers or collaborators who carry out their work for entities that provide goods or services or carry out works for the company (such as Clients and Suppliers of Crippa Campeggio);



- d) to freelancers and consultants who provide their services to the company;
- e) to volunteers and interns, paid and unpaid, who carry out their activities at Crippa Campeggio.

The protection of *whistleblowers* also applies when the reporting, reporting to the judicial or accounting authorities, or public disclosure of information occurs in the following cases:

- a) when the legal relationship referred to in the preceding paragraph has not yet begun, if the information on violations was acquired during the selection process or in other pre-contractual phases;
- b) during the probationary period;
- c) after the termination of the legal relationship if the information on violations was acquired during the course of the relationship itself.

Subject to the provisions of Article 17, paragraphs 2 and 3, of Legislative Decree 24/2023, the protective measures provided for in Chapter III also apply to:

- a) facilitators;
- b) persons in the same work environment as the reporting person, the person who has made a report to the judicial or accounting authorities, or the person who has made a public disclosure, and who are linked to them by a stable affective relationship or relationship by blood up to the fourth degree;
- c) colleagues of the reporting person or the person who has made a report to the judicial or accounting authorities or made a public disclosure, who work in the same work environment as the reporting person and who have a habitual and current relationship with that person;
- d) entities owned by the reporting person or the person who has made a report to the judicial or accounting authorities or who has made a public disclosure, or for which the same persons work, as well as entities operating in the same work environment as the aforementioned persons.

Art. 4 Internal Reporting

Crippa Campeggio has established an internal reporting channel that guarantees the confidentiality of the identity of the reporting person, the person involved, and any other person mentioned in the report, as well as the content of the report and the related documentation.

Reports can be made through the "*Whistleblowing* portal", freely accessible from the company's website.

The data of the report and any identifying data of the reporter, once the request is created, are automatically forwarded, through the portal, to the staff designated for this purpose, which will receive a communication of successful submission, with the identifying code of the same and any further information contained therein. Crippa Campeggio has decided to entrust the management of reports on the portal to an external company, also known as the *Whistleblowing* Staff.

The *Whistleblowing* Staff accesses its reserved area and the detailed information of the various reports received.

Alternatively, reports can be made using the appropriate form available on the company's website of Crippa Campeggio S.r.l., by sending by:

- regular mail or internal mail, it is necessary that the report be placed in two sealed envelopes: the first



with the identifying data of the reporter together with a photocopy of the identification document if the reporter does not intend to proceed with an anonymous report; the second with the report, in order to separate the identifying data of the reporter from the report. Both must then be placed in a third sealed envelope bearing the wording "confidential" to the manager of the report. The report is then subject to confidential protocol, also through an independent register, by the manager.

- ordinary electronic mail (OEM) to the following address: whistleblowing@crippacampoggio.it
- orally, at the request of the reporting person, through a direct meeting set within a reasonable time.

As a rule, the report should contain the following elements:

- the identity of the person making the report;
- a clear and complete description of the facts being reported;
- the circumstances of time and place in which the facts were committed;
- the personal details or other elements that allow the identification of the person(s) who committed the reported facts;
- indication of any other persons who can provide information about the reported facts;
- indication of any documents that can confirm the validity of such facts;
- any other information that can provide useful confirmation of the existence of the reported facts.

The *whistleblower* must provide all useful elements so that verifications and checks can be carried out to confirm the validity of the reported facts.

Reports are made in writing, also using computer methods, or orally. Internal oral reports are made through messaging and voice recording systems or, at the request of the reporting person, through a direct meeting set within a reasonable time.

If a recorded telephone line or another recorded voice messaging system is used for the report, the report, with the prior consent of the reporting person, is documented by the staff through recording on a suitable device for storage and listening or through full transcription. In case of transcription, the reporting person can verify, correct, or confirm the content of the transcription by their own signature. If an unrecorded telephone line or another unrecorded voice messaging system is used for the report, the report is documented in writing by a detailed account of the conversation by the staff. The reporting person can verify, correct, and confirm the content of the transcription by their own signature.

When, at the request of the reporting person, the report is made orally during a meeting with the staff, it, with the prior consent of the reporting person, is documented by the staff through recording on a suitable device for storage and listening or through a verbal report. In case of a verbal report, the reporting person can verify, correct, and confirm the minutes of the meeting by their own signature.

In case the internal report is submitted to a different subject than the one identified and authorized by the management, where the reporting person expressly declares to want to benefit from the *whistleblowing* protections or such intention is deduced from the report, the report is considered a "*whistleblowing* report" and must be transmitted, within seven days from its receipt, to the competent internal subject, with simultaneous notice of the transmission to the reporting person. Otherwise, if the reporting person does not expressly declare to want to benefit from the protections, or such intention is not deduced from the report, said report is considered an "ordinary report".

It is specified that a report submitted to a non-competent subject can be considered *whistleblowing* even if the intention to avail oneself of the protections is inferred from conclusive behaviors (for example, from the use of specific forms for *whistleblowing* reports or from references to the legislation on the subject).



Art. 5 Management of the Internal Reporting Channel - Procedure

Pursuant to Article 5, paragraph 1, letter e) of Legislative Decree 24/2023, this Regulation provides information on the channel, procedures, and prerequisites for making internal and external reports.

Specifically, Crippa Campeggio, which is responsible for managing the internal reporting channel, provides information on the use of the internal and external reporting channel managed by ANAC, with particular attention to the prerequisites for making reports through these channels, the competent subjects entrusted with the management of internal reports and procedures. To ensure adequate visibility in the workplace and accessibility to individuals who, although not frequenting such places, have a legal relationship with Crippa Campeggio, the Regulation is published on the company's website. Crippa Campeggio also displays it in the workplace at a visible point, near the time clock, located on the ground floor, accessible to all the aforementioned individuals. It will also be addressed in ethics and integrity courses and training.

Crippa Campeggio also specifies that anyone intending to make a report must specify that it is a report for which they intend to keep their identity confidential and benefit from the protections provided in the event of any retaliation.

This specification allows, if the report mistakenly reaches a non-competent subject, the latter to promptly transmit it to the authorized subject to receive and manage *whistleblowing* reports. For example, if a report arrives in a sealed envelope indicating that it is a *whistleblowing* report, the recipient, without opening it, promptly forwards it to the competent parties.

The *Whistleblowing* Staff of Crippa Campeggio takes charge of the report for an initial summary investigation.

If necessary, it seeks clarification from the reporter and/or any other individuals involved in the report, ensuring that the investigation is conducted within the terms of the law.

Received reports, the related investigative acts, and all reference documentation are stored and cataloged in a dedicated archive properly safeguarded.

In the context of managing the internal reporting channel, Crippa Campeggio's Staff:

- a. issues a receipt notice to the reporting person within seven days from the date of receipt of the report;
- b. maintains communications with the reporting person and may request, if necessary, further information;
- c. processes and ensures diligent follow-up to the received reports;
- d. provides feedback to the report within three months from the date of the receipt notice or, in the absence of such notice, within three months from the expiration of the seven-day deadline from the submission of the report.

In case of obvious and manifest groundlessness, based on an analysis of the reported facts, Crippa Campeggio, on behalf of the *Whistleblowing* Staff, may decide to archive the request. In this case, specifying the reasons, Crippa Campeggio will inform the reporter about the request made by them.

Respecting reasonable timeframes and data confidentiality, an evaluation is necessary to determine the essential requirements of the report for its admissibility. For evaluation purposes, the entity managing the reports can refer to the same criteria used by the Authority:

- manifest groundlessness due to the absence of factual elements justifying investigations;
- established generic content of the misconduct report that does not allow the understanding of the facts or reports of misconduct accompanied by inappropriate or irrelevant documentation.

Once the admissibility of the report is assessed, the Staff initiates an internal investigation into the reported facts or behaviors to assess their validity.



For the conduct of the investigation, the entity entrusted with the management can engage in dialogue with the *whistleblower*, requesting clarifications, documents, and additional information, either through the dedicated channel in the IT platforms or in person. If necessary, it may also acquire acts and documents from other offices of the administration, seek their support, involve third parties through hearings and other requests, always ensuring that the confidentiality of the reporter and the reported is not compromised.

If, as a result of the activities carried out, elements of manifest groundlessness of the report are identified, it will be archived with adequate motivation. Where, instead, the validity of the report is recognized, it is appropriate to immediately refer to the internal or external competent bodies, each according to its competencies.

The entity responsible for managing the report is not responsible for establishing individual responsibilities of any kind or for carrying out checks on the legitimacy or merit of acts and measures adopted by Crippa Campeggio, which are the subject of the report.

Upon completion of the investigation, feedback is provided to the reporting person.

Regarding the feedback to be provided within the three-month period, it should be noted that it may consist of:

- communication of the archiving,
- initiation of an internal investigation and possibly the related findings,
- measures taken to address the raised issue,
- referral to a competent authority for further investigations.

However, it should be clarified that the same feedback, to be provided within the three-month period, may also be merely interim, as it may include information on all the activities described above that it is intended to undertake and the progress of the investigation. In the latter case, once the investigation is completed, the results must still be communicated to the reporting person.

Art. 6 Anonymous Reports

Crippa Campeggio undertakes to protect the anonymity of the reporter and allow the acceptance of anonymous communications made by the same.

Crippa Campeggio, however, reserves the right to consider anonymous reports where they are sufficiently detailed and provided with an abundance of details, i.e., such as to reveal facts of particular gravity with adequately detailed, substantiated, and related content to specific contexts (e.g., indication of specific names or qualifications, mention of specific offices, procedures, or events, etc.).

Art. 7 External Reporting - Conditions

It is possible to make an external report if, at the time of submission, one of the following conditions is met:

- a. the internal reporting channel referred to in the previous Article 5 is not active;
- b. the reporting person has already made an internal report and it has not had any follow-up;
- c. the *whistleblower* has reasonable grounds to believe that if they were to make an internal report, it would not be effectively followed up, or that the same report may pose 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.

The external reporting channel, in accordance with the provisions of Article 7 of Legislative Decree 24/2023, is established at the National Anti-Corruption Authority (ANAC) (<https://www.anticorruzione.it/-/whistleblowing>).

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

An external report submitted to a subject other than ANAC is transmitted to the latter within seven days from the date of its receipt, with simultaneous notice of the transmission to the reporting person.

In managing the external reporting channel, ANAC performs the following activities:

- a) provides information on the use of the external reporting channel and the internal reporting channel, as well as on the protective measures provided for in Chapter III of Legislative Decree 24/2023, to any interested person;
- b) notifies the reporting person of the receipt of the external report within seven days from the date of its receipt, unless explicitly requested otherwise by the reporting person or unless ANAC considers that the notice would prejudice the protection of the confidentiality of the reporting person's identity;
- c) maintains communications with the reporting person and requests, if necessary, further information;
- d) promptly follows up on the received reports;
- e) conducts the necessary investigation to follow up on the report, also through hearings and acquisition of documents;
- f) provides feedback to the reporting person within three months or, if justified and motivated reasons exist, six months from the date of receipt notice of the external report or, in the absence of such notice, from the expiration of the seven-day deadline from receipt;
- g) communicates the final outcome to the reporting person.

ANAC may choose not to follow up on reports that report minor violations and proceed with their archiving.

Art. 8 Confidentiality Obligation

Reports cannot be used beyond what is necessary to give them adequate follow-up.

The identity of the reporting person and any other information from which their identity may be directly or indirectly inferred cannot be disclosed without the express consent of the reporting person to persons other than those competent to receive or follow up on the reports and therefore part of Crippa Campeggio's Staff as the addressee of the report.

In the context of disciplinary proceedings, the identity of the reporting person cannot be disclosed if the disciplinary charge is based on separate and additional findings than those of the report, even if subsequent to it. If the charge is based, in whole or in part, on the report and the knowledge of the reporting person's identity is essential for the defense of the accused, the report can only be used in the disciplinary proceedings with the express consent of the reporting person to reveal their identity. The reporting person shall be notified in writing of the reasons for disclosing the confidential data if the disclosure of the identity of the reporting person and related information is also essential for the defense of the person involved.

The report is exempt from access as provided for by articles 22 and following of law no. 241 of August 7, 1990,



as well as by articles 5 and following of legislative decree no. 33 of March 14, 2013.

Notwithstanding what is provided for in Article 12 of legislative decree 24/2023, in proceedings initiated by reason of a report, the person involved may be heard, or, at their request, shall be heard, even through a paper-based procedure by acquiring written observations and documents.

Art. 9 Processing of Personal Data

Any processing of personal data concerning the provision of the *Whistleblowing* portal will necessarily be carried out in compliance with Regulation (EU) 2016/679, legislative decree no. 196 of June 30, 2003, and legislative decree no. 51 of May 18, 2018.

Personal data that is clearly not useful for the processing of a specific report is not collected or, if accidentally collected, will be immediately deleted by Crippa Campeggio's Staff.

The rights provided for in Articles 15 to 22 of Regulation (EU) 2016/679 may be exercised within the limits of what is provided for in Article 2-undecies of legislative decree no. 196 of June 30, 2003.

The processing of personal data relating to the receipt and management of reports is carried out by Crippa Campeggio s.r.l. as Data Controller, in compliance with the principles set out in Articles 5 and 25 of Regulation (EU) 2016/679, providing adequate information to reporting persons and persons involved pursuant to Articles 13 and 14 of the same Regulation (EU) 2016/679, and adopting appropriate measures to protect the rights and freedoms of data subjects.

Art. 10 Conservation of Documentation Concerning Reports

Reports and related documentation are kept for the time necessary for the processing of the report and in any case not beyond five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations under Article 8 of this Regulation and the principle set out in Article 5(1)(e) of the GDPR.

Art. 11 Public Disclosures

The reporting person making a public disclosure benefits from the protection provided for by this decree if, at the time of the public disclosure, one of the following conditions is met:

- a. the reporting person has previously made an internal and external report or has directly made an external report, under the conditions and procedures provided for in Articles 4 and 7, and prompt feedback has not been provided regarding the measures envisaged or taken to follow up on the reports;
- 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 entail the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those where evidence may be concealed or destroyed, or where there is a well-founded fear that the recipient of the report may collude with the author of the violation or be involved in the violation itself.

The rules on professional secrecy of journalistic activities regarding the source of the news remain unchanged.

Art. 12 Conditions for the Protection of the Whistleblower

The protective measures provided for in Chapter III of legislative decree 24/2023 apply to persons referred to



in Article 3 of this regulation when the following conditions are met:

- a. at the time of the report or denunciation to the judicial or auditing authority or public disclosure, the reporting or denouncing person had reasonable grounds to believe that the information on the reported violations, publicly disclosed, or denounced was true and fell within the objective scope of Article 1 of this regulation;
- b. the report or public disclosure was made on the basis of what is provided for in Articles 7 and 11 of this regulation and, in general, by Chapter II of legislative decree 24/2023.

The reasons that led the person to report, denounce, or publicly disclose are irrelevant for their protection.

The criminal and disciplinary liability of the *whistleblower* is unaffected in the case of false or defamatory reporting under Articles 368 and 595 of the Penal Code and Article 2043 of the Civil Code.

Unless provided otherwise in the subsequent Article 14, when the reporting person's criminal liability is established, even by a first-instance judgment, for offenses of defamation or slander or for the same offenses committed through the report to the judicial or auditing authority, or their civil liability, for the same reason, in cases of intent or gross negligence, the protections established by Chapter III of legislative decree 24/2013 are not guaranteed, and a disciplinary sanction is also imposed on the reporting or denouncing person.

The same measures are applied to cases of anonymous reporting or denunciation to the judicial or auditing authority or public disclosure if the reporting person is subsequently identified and has suffered retaliation.

Art. 13 Prohibition of Retaliation

Subjects referred to in Article 3 of this regulation cannot suffer any type or nature of retaliation.

In judicial, administrative proceedings, or any out-of-court disputes concerning the ascertainment of behaviors, acts, or omissions prohibited under this article against persons referred to in Article 3, it is presumed that they were carried out because of the report, public disclosure, or denunciation to the judicial or auditing authority. The burden of proving that such conduct or acts are motivated by reasons unrelated to the report, public disclosure, or denunciation lies with the person who carried them out.

In the case of compensation claims submitted to the judicial authority by persons indicated in Article 3 of this regulation, if these persons demonstrate that they have made, under legislative decree 24/2023, a report, a public disclosure, or a denunciation to the judicial or auditing authority and have suffered damage, it is presumed, unless proven otherwise, that the damage is a consequence of such report, public disclosure, or denunciation to the judicial or auditing authority.

The instances listed in Article 17, paragraph 4, of Legislative Decree No. 24/2023 constitute retaliations, and more particularly:

- a. dismissal, suspension, or equivalent measures;
- b. demotion or failure to promote;
- c. change of duties, change of workplace, salary reduction, modification of working hours;
- d. suspension of training or any restriction of access to it;
- e. negative performance evaluations or references;
- f. imposition of disciplinary measures or other sanctions, including pecuniary ones;



- g. coercion, intimidation, harassment, or ostracism;
- h. discrimination or other unfavorable treatment;
- i. failure to convert a fixed-term employment contract into an indefinite-term contract, where the worker had a legitimate expectation of such conversion;
- j. non-renewal or early termination of a fixed-term employment contract;
- k. damages, including damage to reputation, particularly on social media, or economic or financial prejudices, including loss of economic opportunities and loss of income;
- l. early termination or cancellation of a supply contract for goods or services;
- m. cancellation of a license or permit;
- n. request for psychiatric or medical examinations.

Acts performed in violation of this article and, in general, of Article 17 of legislative decree 24/2023 are null and void. Persons referred to in Article 3 of this regulation who have been dismissed due to the report, public disclosure, or denunciation to the judicial or auditing authority have the right to be reinstated in their workplace, according to the specific discipline applicable to the worker.

Subjects referred to in Article 3 of this regulation may report to ANAC any retaliations they believe they have suffered as a result, direct or indirect, of any kind.

The reporting person who believes they have suffered discrimination or retaliation may also report the detailed discrimination to Crippa Campeggio's Staff, who, promptly assessing the existence of elements, report the hypothesis of discrimination to:

- Crippa Campeggio s.r.l. administration;
- the internal management of the Division to which the employee who allegedly discriminated belongs;
- the Public Prosecutor's Office if criminally relevant facts occur.

The reporting person retains the right to report the incident to any relevant trade unions or competent judicial authorities.

Art. 14 Limitations of Liability

Pursuant to Article 12 of this regulation and in application of the legislation under Legislative Decree 24/2023, the persons referred to in Article 3 of this regulation who disclose or disseminate information about violations covered by the obligation of secrecy or related to the protection of copyright or the protection of personal data, or who disclose or disseminate information about violations that harm the reputation of the person involved or denounced, are not punishable when, at the time of disclosure or dissemination, there are reasonable and plausible grounds to believe that the disclosure or dissemination of such information was necessary to reveal the violation and the set of facts reported in the report, public disclosure, or denunciation to the judicial or auditing authority.

When the above conditions are met, any further liability, including civil or administrative liability, is also excluded. Unless the act constitutes a crime, the persons referred to in Article 3 of this regulation do not incur any liability, including civil or administrative liability, for the acquisition of information about violations or for access to them through the use of the *Whistleblowing* portal or in any other way through which it is possible



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to submit a report to Crippa Campeggio s.r.l.

In any case, criminal liability and any other liability, including civil or administrative liability, are not excluded for behaviors, acts, or omissions not related to the report, denunciation to the judicial or auditing authority, or public disclosure or that are not strictly necessary to reveal the violation or to conduct the necessary and due investigations into the facts and events reported in the report.

Art. 15 Further Provisions

Retaliations, cases where the report has been obstructed or attempted to be obstructed, violations of the confidentiality obligation under the preceding Article 8, the lack of verification and analysis of received reports, and reports manifestly opportunistic made solely for the purpose of defaming and/or slandering the accused or other subjects are disciplinary sanctioned.

Waivers and settlements, whether total or partial, concerning the rights and protections provided by this Regulation and, in general, by legislative decree 24/2023 are not valid and entirely void unless made in the forms and manners provided for in Article 2113, paragraph 4, of the Civil Code.

In accordance with Article 18 of legislative decree 24/2023, ANAC establishes a list of Third Sector entities that provide support measures to reporting persons.

Any matter not expressly provided for in this regulation and any further necessary clarification on the subject, as well as the regulation of Crippa Campeggio s.r.l.'s *Whistleblowing* portal, are deferred to legislative decree 24/2023.

Art. 16 Entry into Force

This Regulation was approved on 16/12/2023 and is therefore in force from 17/12/2023.

Read, signed, and subscribed.

For Crippa Campeggio s.r.l.

The Legal Representative