

ANNEX A
FORM FOR REPORTING ILLEGAL CONDUCT OR IRREGULARITIES

REPORTER'S DETAILS

First name and surname

Job title or professional position

Telephone/Mobile

Email

CONDUCT REPORTED

Date or period when the incident occurred:

dd/mm/yy

Physical location where the incident occurred: (indicate name and location)

Outside the office: (indicate location and address)

I believe that the actions or omissions committed or attempted are:

- ☐ criminally relevant;
- ☐ civil offences;
- ☐ administrative and/or accounting offences;
- ☐ carried out in violation of provisions whose violations are punishable by disciplinary action;
- ☐ likely to cause financial damage to CAP ARREGHINI S.p.A.;
- ☐ likely to damage the image of CAP ARREGHINI S.p.A.;
- ☐ likely to cause damage to the health or safety of employees, citizens or users, or to cause damage to the environment;
- ☐ likely to cause harm to employees, users or other persons carrying out their activities at CAP ARREGHINI S.p.A.;
- ☐ other (specify) _____

Description of the incident (conduct and event):

Author(s) of the incident:

1 _____

2 _____

3 _____

Other individuals who may be aware of the incident and/or able to report on it: 1_

2 _____

3 _____

Consent to disclose your name to the accused

☐ YES ☐ NO

Place and date _____ Signature _____

The report may be submitted:

* By means of a paper report placed in three sealed envelopes: the first containing the reporter's identification details together with a photocopy of their identity document; the second containing the report, so as to separate the reporter's identification details from the report. Both must then be placed in a third sealed envelope marked 'confidential' to the report manager (e.g. 'confidential to the Chairman of the Supervisory Board'). The report must be sent to Giulio Mosetti, Corso Italia 90/2, Gorizia. Upon receipt of the report, it will be registered confidentially by the manager, including in a separate register.

**INFORMATION PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF
INDIVIDUALS FOR REPORTING ILLEGAL ACTIVITIES - WHISTLEBLOWERS REFERRED TO IN LEGISLATIVE
DECREE 24/2023**

CAP ARREGHINI S.p.A. undertakes to respect your privacy and protect your personal data, i.e. data that could in any way lead to your identification. This personal data information letter contains information about the reasons and methods by which the company will process your personal data and what types of personal data will be collected.

The Data Controller of your personal data in relation to this consent is CAP ARREGHINI S.p.A., whose contact details are:
Headquarters: Viale Pordenone n.80, 30026, Portogruaro (VE)
Telephone: +39 0421/278115

Personal data is processed by the Head of Internal Reporting *pursuant to* Legislative Decree 24/2023 (known as *whistleblowing*) of CAP ARREGHINI S.p.A. in its capacity as External Data Processor appointed for this purpose pursuant to Article 28 of Regulation (EU) 2016/679 ("GDPR") in the performance of its duties related to the investigation of any illegal acts reported in the interest of the Company that may be reported by employees of CAP ARREGHINI S.p.A. or by third parties and falling within the regulatory provisions of Legislative Decree 24/2023.

1. LEGAL BASIS FOR PROCESSING

The legal bases for the processing are:

- a) the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR, which, having become aware of the report you have submitted, intends to guarantee and preserve the integrity of the company's assets;
- b) the need to comply with a legal obligation to which the Data Controller is subject, with reference to the provisions contained in Law 179/2017 and Legislative Decree No. 24/2023;
- c) the need for the Data Controller to ascertain, exercise or defend a right in court, if necessary;
- d) your specific consent pursuant to Articles 6(1)(a) and 9(2)(a) of the GDPR.

Please note that the provision of personal data (personal and contact details) in reports pursuant to Legislative Decree 24/2023 is optional; failure to provide personal data could, however, prejudice the investigation of the report: anonymous reports will only be taken into consideration if they are adequately detailed and provide sufficient information to highlight facts and situations related to specific contexts.

2. TYPES OF DATA PROCESSED AND PURPOSES OF PROCESSING

The data provided by the whistleblower in order to report alleged unlawful conduct of which they have become aware in the course of their employment, committed by individuals who interact with them in various capacities, are processed for the purpose of carrying out the necessary investigations to verify the validity of the reported facts and the adoption of the resulting measures.

3. DATA RECIPIENTS

The recipients of the data collected following the report, where applicable, are the Judicial Authority and ANAC, in addition to the Internal Reporting Manager as External Data Processor.

4. PERIOD OF RETENTION OF PERSONAL DATA

The personal data collected is retained for a period not exceeding ten years from the date of receipt of the report, as well as for the entire period necessary to carry out any proceedings arising from the management of the report (disciplinary, criminal, accounting). This is without prejudice to storage for a longer period in relation to requests from public authorities and the Data Protection Authority. This is without prejudice to the storage of personal data, including special categories of data, for a longer period, within the limits of the limitation period for rights, in relation to requirements connected with the exercise of the right of defence in the event of disputes.

5. RIGHTS OF DATA SUBJECTS

In accordance with Regulation (EU) 2016/679, you have certain rights in relation to the processing of your personal data, which are set out below.

- Right of access to your personal data collected by the Company. You have the right to obtain a copy of your personal data collected by the Company and to verify the correctness of the processing thereof.
- Right to rectify, correct and update your personal data collected by the Company. You have the right to correct any incomplete or inaccurate information relating to you collected by the Company.
- Right to receive the personal data you have provided in a structured and machine-readable format (data portability) and right to transmit such data to another data controller, provided that this is within the scope of the performance of an employment relationship.
- Right to erasure of your personal data. You have the right to request the erasure or removal of your personal data if there is no longer a legitimate reason for the Company to process it. You have the right to request the erasure of your personal data if you have exercised your right to object to its processing.
- Right to restrict the processing of your personal data. You have the right to request that the Company suspend the processing of your data (if, for example, you wish to verify the accuracy of the processing or the purposes of the processing).
- Right to object to the processing of your personal data in certain circumstances. This right only applies if the processing of your data is based on a legitimate interest of the Company or in the case of profiling of your data.
- Right to withdraw consent. If the processing of your personal data is based on your consent, you have the right to withdraw your consent to the processing of your data at any time.

Read, confirmed and signed.

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MR/MS
