

ANNEX A
FORM FOR REPORTING UNLAWFUL CONDUCT OR IRREGULARITIES

REPORTER'S DETAILS

First name and surname

Job title or professional position

Tel./mobile

Email

CONDUCT REPORTED

Date or period when the incident occurred:

dd/mm/yy

Physical location where the incident took place: (please state name and address)

Outside the office: (please state the location and address)

I consider that the acts or omissions committed or attempted are: criminally

- relevant;
- civilly wrongful;
- administrative and/or accounting offences;
- committed in breach of provisions, the violation of which is subject to disciplinary sanctions; likely to
- cause financial loss to CAP ARREGHINI S.p.A.;
- likely to damage the reputation of CAP ARREGHINI S.p.A.;
- likely to cause harm to the health or safety of employees, members of the public 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 (please specify) _____

Description of the incident (conduct and event):

Perpetrator(s) of the incident:

1 _____

2 _____

3 _____

Any other individuals with knowledge of the incident and/or able to provide information

about it: 1 _____

2 _____

3 _____

Consent to disclose one's name to the accused

Y NO
E
S

Place and date _____ Signature _____

The report may be submitted:

* By means of a written report placed in three sealed envelopes: the first containing the reporter's personal details together with a photocopy of their identity document; the second containing the report itself, so as to separate the reporter's personal details from the report. Both must then be placed in a third sealed envelope bearing the words 'confidential' on the outside, addressed to the person responsible for handling the report (e.g. 'confidential to the Chair of the Supervisory Board'). The report must be sent to Chiara Maltese, Solicitor, Via Brusafiera 12, 33170 Pordenone (PN). Upon receipt of the report, it will be subject to confidential registration by the report handler, including via a separate register.

PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF INDIVIDUALS REPORTING ILLEGAL ACTIVITIES – WHISTLEBLOWERS AS REFERRED TO IN LEGISLATIVE DECREE 24/2023

CAP ARREGHINI S.P.A. is committed to respecting your privacy and protecting your personal data, i.e. data that may in any way lead to your identification. This privacy notice contains information regarding the reasons and methods by which the company will process your personal data and the types of personal data that will be collected.

The Data Controller for your personal data in relation to this consent is CAP ARREGHINI S.P.A., whose contact details are as follows:
Registered office: Viale Pordenone No. 80, 30026, Portogruaro (VE)
Telephone: +39 0421/278115

Personal data is processed by the Head of Internal Reporting at CAP ARREGHINI S.p.A., pursuant to Legislative Decree 24/2023 (so-called 'whistleblowing'), in their capacity as an External Data Processor appointed for this purpose in accordance with Article 28 of Regulation (EU) 2016/679 ("GDPR") in the performance of their duties relating to the investigation of any alleged offences reported in the interests of the Company, which may be reported by employees of CAP ARREGHINI S.p.A or by third parties and which fall within the scope of the 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 ensure 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 Data Controller's need to establish, exercise or defend a legal claim in court, should this be 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 details and contact details) in reports referred to in Legislative Decree 24/2023 is optional; however, failure to provide personal data could prejudice the investigation of the report: anonymous reports, in fact, will only be taken into consideration if they are adequately substantiated and provided in sufficient detail to bring to light facts and situations relating 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 by virtue of their employment relationship, committed by individuals who interact with them in various capacities, is processed for the purpose of carrying out the necessary investigations to verify the validity of the facts reported and to take the appropriate measures.

3. RECIPIENTS OF THE DATA

The recipients of the data collected following the report are, where applicable, the judicial authorities and ANAC, in addition to the Internal Reporting Officer, who acts as the External Data Controller.

4. RETENTION PERIOD FOR 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 handling of the report (disciplinary, criminal, accounting).

This is without prejudice to the retention of data for a longer period in response to requests from public authorities and the Data Protection Authority.

This is without prejudice to the retention of personal data, including special categories of personal 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.

- Rights 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 accuracy of its processing.
- 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 that has been collected by the Company.
- Right to receive the personal data you have provided in a structured, machine-readable format (data portability) and the right to transmit such data to another data controller, provided this is in the context 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 where there is no longer a legitimate basis for the Company to process it. You have the right to request the erasure of personal data where you have exercised your right to object to the 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 (for example, if you wish to verify the lawfulness of the processing or the purposes of the processing).
- Right to object to the processing of your personal data in certain circumstances. This right applies only where 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. Where 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 / MRS
