

# Whistleblowing

The regulatory requirement is coming.  
Companies with more than 50 employees are obliged to  
by December 17, 2023  
to have a whistleblowing system in place.

# What is Whistleblowing?

- Whistleblowing, or reporting an alleged wrongdoing, consists of an internal process that allows an employee to report misconduct or wrongdoing that he or she has become aware of within a company.
- Such reports may concern, for example, fraud, corruption, safety violations, environmental risks, and more.

# What is Whistleblowing?

- Activating a whistleblower service allows employees and interested parties (former employees, family members, contractors, etc.) to inform management or the identified body about suspected or actual wrongdoing.
- This allows the company to act preemptively in order to prevent a situation from escalating and escaping the company's control.

# Normative Framework

- The European Whistleblowing Directive (2019/1937), effective Dec. 17, 2021, requires the adoption of new standards of protection for "whistleblowers" (i.e., those who report).
- Specifically, companies with between 50 and 250 employees are obliged by Dec. 17, 2023, to have an encrypted, anonymous and structured internal whistleblower reporting system that takes into account the utmost confidentiality of the whistleblower and ensures his or her anonymity.

# Normative Framework

- At the national level, Legislative Decree No. 24/2023, which introduces the new whistleblowing regulations in Italy, came into effect on March 30, 2023. The new provisions will take effect from:
- July 15, 2023, for private sector entities that employed an average of more than 249 employees in the last year.
- Dec. 17, 2023, for private-sector entities that employed, in the last year, an average number of employees greater than 50 but less than 249.

# Why is it important?

- Business integrity: helps organizations identify and address potential problems before they escalate into crisis, preserving reputation and stakeholder trust.
- Employee protection: provides maximum protection for workers who report wrongdoing, ensuring that they do not suffer retaliation or discrimination for acting in the best interests of the company and the community.

# Why is it important?

- Regulatory compliance: with the introduction of new laws, adopting an effective whistleblowing system is not only a good practice but also becomes a mandatory legal requirement.
- Reputational benefits: whistleblowing is not only a requirement, but also an opportunity for companies to demonstrate their commitment to transparency and ethics. An effective system not only avoids possible sanctions, but also strengthens the trust of employees and stakeholders, creating a safer and more responsible work environment.

## Stefani SpA's chosen channel

- The Company has established an internal reporting channel, pursuant to Article 4 of Legislative Decree No. 24/2023.
- In particular, the Company has identified a dedicated telephone number (+39 344 0272964) to be contacted through the TELEGRAM app, which is adequately encrypted so as to ensure the confidentiality of the reporter, the person involved and the person in any case mentioned in the report, as well as the content of the report and the relevant attached documentation.
- Through this channel it is possible to make reports in written and oral form, including through a recorded voice message.



# Stefani SpA's chosen channel

- This is without prejudice, however, to the possibility of sending the report in a sealed envelope, without external identification of the sender and with the wording "WHISTLEBLOWING REPORT", to the address of the Company (Via Del Lavoro 9 - 36020 Castegnero - VI) as well as that of requesting a direct meeting to present an oral report.
- Pursuant to Legislative Decree No. 24/2023, in addition, the whistleblower may take advantage of an external reporting channel provided by ANAC (ANAC | Home page - [www.anticorruzione.it](http://www.anticorruzione.it)), or public disclosure, upon the occurrence of specific conditions set forth in Articles 6 and 15 of the aforementioned Decree.

# Recipients of the report

- The DPO and Data Processor are in charge of the internal whistleblowing channel.
- The identity of the whistleblower is confidential and known only to the sole appointee who manages the whistleblowing channel. The latter shall forward the report to the other members of the Administrative Body, taking care to omit any data that may even indirectly lead back to the identity of the whistleblower.

# How a report is handled

- The person in charge of receiving the contents of the report is responsible for:
  - issue the whistleblower with an acknowledgement of receipt of the report within seven days from the date of its transmission;
  - proceed to document the report received.

# How a report is handled

- verbalize, even if only in summary form, the report in an appropriate receipt form;
- maintain interlocations with the reporting person and request additions from the latter, if necessary;
- diligently follow up on the report received.

# Thanks for your attention!

- Valentina Turco (DPO of Stefani SpA)
- Stefani SpA