

Extract Policy Whistleblowing - PDR/DE&I: differences between reporting channels

ABSTRACT

POLICY WHISTLEBLOWING

GENDER EQUALITY & DIVERSITY, EQUITY AND INCLUSION

The Policy's **PURPOSE** is:

- **Encourage a corporate culture** based on communication and transparency by removing factors that may hinder or discourage reporting, such as doubts and uncertainties about the procedure to be followed and fears of the Signaler to suffer retaliation or discrimination following the Report;
- **Provide clear indications** about the communication channels, the subject and the way of making reports, so that anyone can know and verify at any time the correct application.

The **COMMUNICATION CHANNELS** for the Report are:

1. WHISTLEBLOWING CHANNEL



2. PDR/DE&I CHANNEL





1. WHISTLEBLOWING CHANNEL

Definition: Whistleblowing means a spontaneous report made by a person, called “**Signaler**”, of offences and/or irregularities committed within Lafert S.p.A., of which the same has been witness during the course of its working activities.



The: **SIGNALER** can be:

Internal to the company

Alle employees (full-time, part-time, temporary, trainees, dismissed etc.)

External to the company

Customers, suppliers, banks, freelancers and consultants, shareholders, candidates for job positions and anyone who has interest relations with Lafert S.p.A. (such as SHI employees or subsidiary employees)

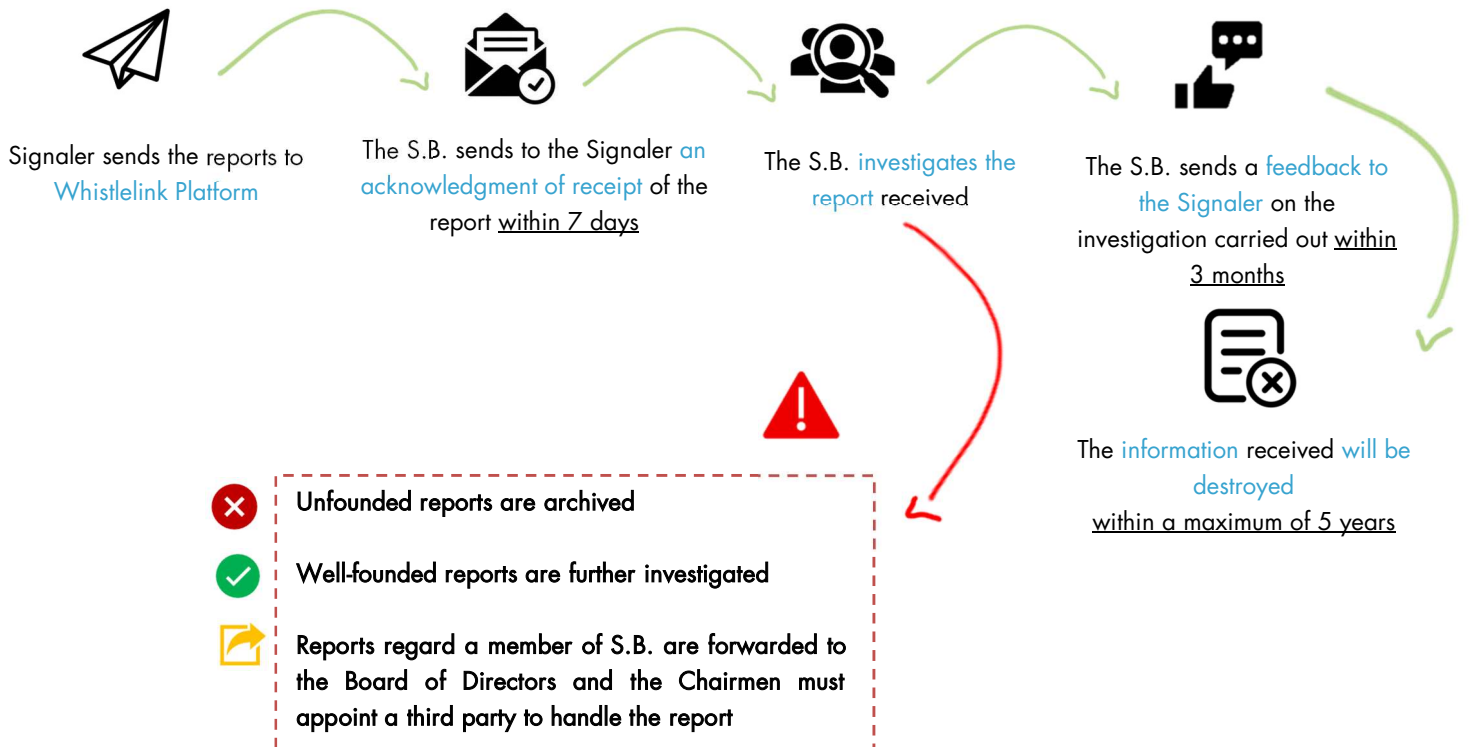


REPORT AREAS

- ✓ Economy, finance, money, money laundering
- ✓ Corruption, conflict of interest, illegal abuse of a position or office for personal gain (money or other utilities)
- ✓ Procurement
- ✓ Transport, products, production
- ✓ Personal life and/or health
- ✓ Environmental impact
- ✓ Handling of personal data
- ✓ IT security
- ✓ Threats, violence, theft
- ✓ **Reports concerning the members of the Diversity, Inclusion, and Gender Equality Committee**
- ✓ Other (more generally, violations of the principles expresses in the Code of Ethics and Business Conduct, in the Model 231, in the Policy on diversity, equity and inclusion, in the policies and procedures of Lafert S.p.A., etc.)

MANAGEMENT OF REPORTS

INTERNAL CHANNEL → is entrusted to the **SUPERVISORY BOARDS** (S.B.) by the Whistlelink platform



ANAC **EXTERNAL CHANNEL** → the Signaler can use the external channel provided by ANAC (National Antibribery Authority) if the internal channel has not been activated, it does not work, it does not offer the confidentiality guarantees requested or if the Signaler fears to suffer retaliation following the Report.



2. PDR/DE&I CHANNEL

Definition: PDR/DE&I reports means any communication concerning behavior and/or information which may supplement the evidence of a criminal offence or otherwise inappropriate conduct, incorrect or alleged violation of the principles expressed in the Company Policy and the policies and procedures of Lafert S.p.A., as well as the laws and regulations applicable to Lafert S.p.A. according to UNI/PDR 125:2022 and ISO 30415: 2021 DE&I.



The Signaler can be :

Internal to the company

Alle employees (full-time, part-time, temporary, trainees, dismissed etc.)

External to the company

Customers, suppliers, banks, freelancers and consultants, shareholders, candidates for job positions and anyone who has interest relations with Lafert S.p.A. (such as SHI employees or subsidiary employees)

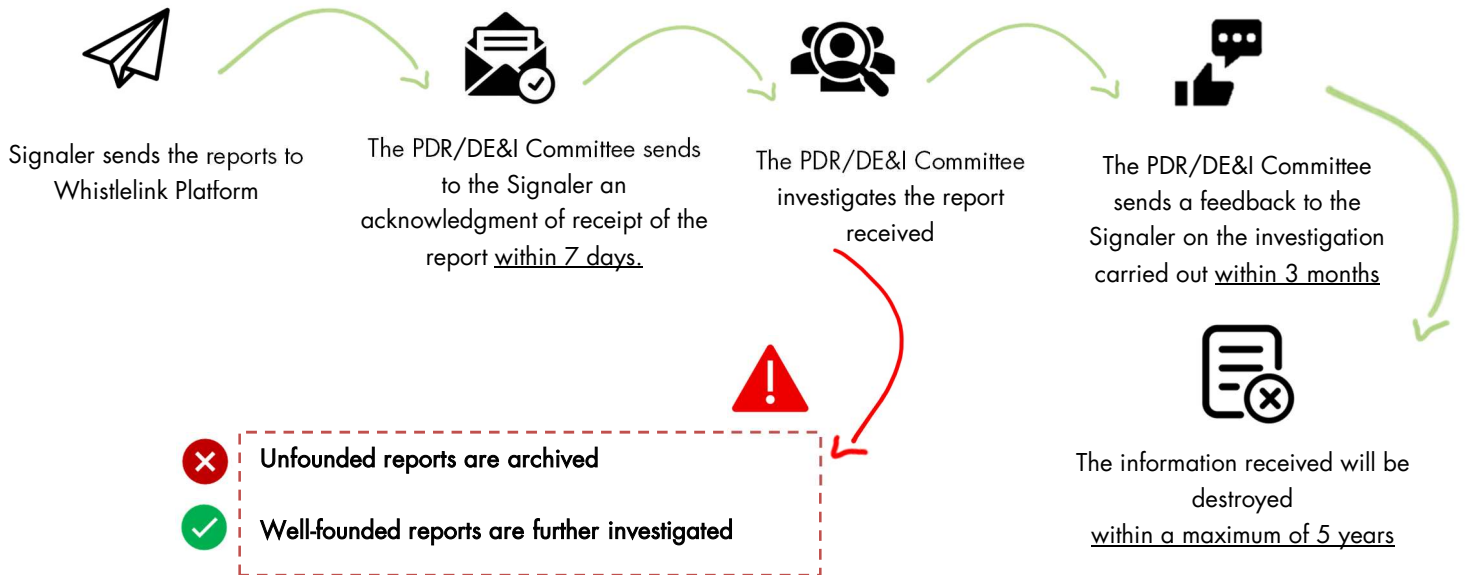


REPORT AREAS:

- ✓ Sexual harassment
- ✓ Physical abuse
- ✓ Verbal abuse
- ✓ Digital (harassment)
- ✓ Mobbing
- ✓ Discrimination (gender, race, religion, sexual orientation, etc.)
- ✓ Wage Disparity or other nature
- ✓ Use of inappropriate language
- ✓ Behaviour contrary to the company's principles and policies
- ✓ Procedural or system deviations detected during an audit

MANAGEMENT OF REPORTS

INTERNAL CHANNEL → is entrusted to the **PDR/DE&I COMMITTEE** by Whistlelink platform



EXTERNAL CHANNEL → the Signaler can use the external channel managed by the **Equity Adviser**, if the Internal channel does not take charge of the report on time.