

UNIONE FIDUCIARIA

# Comunica Whistleblowing

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IT Channel User Guide

Unione Fiduciaria

automatic translation

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## 1 Aim of the document

This Manual is aimed at describing the use of the “Comunica Whistleblowing” IT application, used to make reports pursuant to Legislative Decree no. 24 of 10 March 2023, “Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, concerning the protection of persons who report breaches of Union law and containing provisions concerning the protection of persons who report breaches of national regulatory provisions”, as well as for reporting offenses and irregularities referred to in 'art. 48 of Legislative Decree 21 November 2007 n. 231 concerning "violations, potential or actual, of the provisions dictated for the prevention of money laundering and terrorist financing".

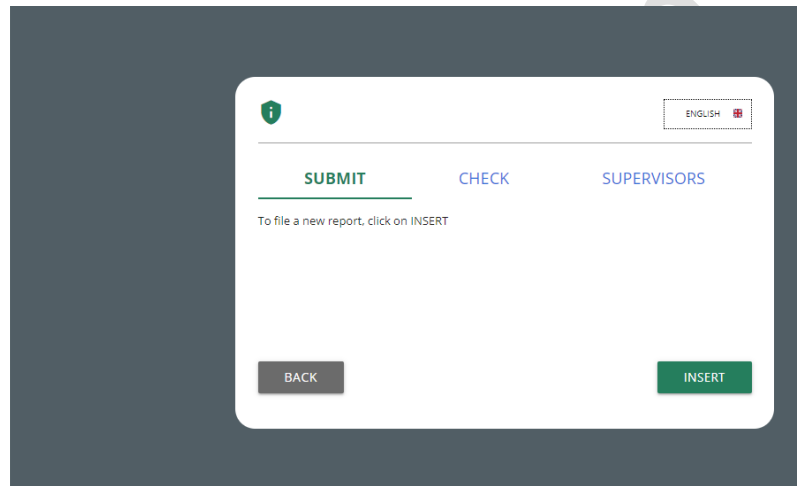
## 2 Changelog

Date	Version	Description Changes
	1	Initial version for application version 3

### 3 Common access portal

Access to the system is totally anonymous and does not require any type of identification.

**SNAITECH**

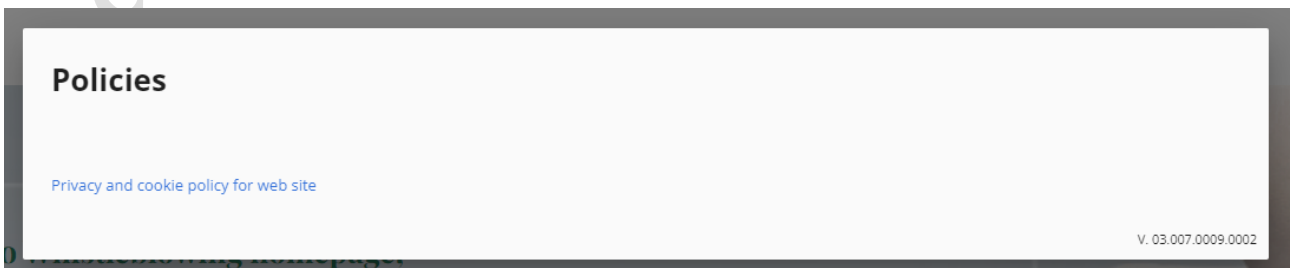


### 4 Information

The following symbol is present on all pages



By clicking on this symbol it will be possible to view the privacy policy of Unione Fiduciaria as supplier of the product.



It is necessary to send the Report beforehand

- (i) read the privacy policy/terms and conditions/Whistleblowing Policy of the Company for which you are reporting;
- (ii) **select the Company** owner of the facts to be reported;
- (iii) select the method of sending the Report (written message or voice message).

If you intend to send a voice message, you must select the logo of the chosen company with the microphone icon next to it.



With reference to companies that have employed an average of at least 50 employees in the last year, it is possible to make reports pursuant to Legislative Decree 24/2023, Legislative Decree 231/2001 and subsequent amendments as well as the Model of organization and management and control of the Company.



### 3. OBJECT OF REPORTING

- Reporting Offences pursuant to Legislative Decree no. 24/2023, Legislative Decree 231/01 and ss.mm.ii, the Organisational, Management and Control Model.**

The reporting party may submit circumstantiated reports of unlawful conduct, relevant under (i) Legislative Decree no. 24/2023 and Reports of acts or omissions detrimental to the financial interests of the European Union, referred to in the same Decree, (ii) Legislative Decree no. 231/01 as amended based on precise and concordant elements of fact or violation of the Organisation, Management and Control Model of which it has become aware by reason of its functions (ref.art.6 paragraph 2 bis of Legislative Decree 231/01).

[Privacy Notice 1](#)

- Reporting Offences pursuant to Art. 48 of Legislative Decree 231/2007 as amended (concerning the prevention of the use of the financial system for the purpose of money laundering and the financing of terrorism).**

The reporter (**employee of the Company or person in a comparable position**) may submit reports of potential or actual breaches of the provisions laid down for the prevention of money laundering and the financing of terrorism (Art. 48 D.Lgs.231/2007 as amended).

[Privacy Notice 2](#)

With reference to companies that have employed fewer than 50 employees in the last year, it is possible to make reports pursuant to Legislative Decree 231/2001 and subsequent amendments as well as the Company's organisation, management and control model.

Reports relating to the prevention of the use of the financial system for the purposes of money laundering and terrorist financing referred to in art. 48 of Legislative Decree 231/2007 can be carried out, in compliance with current legislation, by Company employees and by people in comparable positions.

For details regarding the legislation being reported relating to each individual company for which the report is being made, we invite you to consult the specific Whistleblowing Policy.

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### 3. OBJECT OF REPORTING

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[Privacy Notice 1](#)

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[Privacy Notice 2](#)

## 4.1 Compilation of reports

Below is an example of a report submission form divided into compilation sections.

The screenshot shows the 'Preliminary information' section of a whistleblowing report form. At the top, there is a progress bar with four steps, where the first step is highlighted in green. The title 'Comunica Whistleblowing Snaitech WBL - Segnalazione Whistleblowing Dlgs. 24/2023 - Snaitech' is visible in the top right corner. The section title 'Preliminary information' is followed by two questions. The first question is 'Which Directorate/BU/Function/Area of the company does the report relate to?\*' with a dropdown menu currently showing '--'. The second question is 'Have you already reported the facts or acts in question to your manager or others?' with radio button options for 'Yes' and 'No'. Below these questions is a text input field for 'If yes, what was the outcome?'. At the bottom left, there is a 'BACK' button, and at the bottom right, there is a 'CONTINUE' button. A note at the bottom left states 'Fields marked with \* are mandatory'.

The Reporter has the right to decide whether to remain anonymous or communicate his/her personal details (name, surname, tax code).

The compilation fields referring to personal details will appear exclusively if the Reporter declares that he wishes to provide his identity.

Example images of the reporting sheets follow.

The screenshot shows the 'Whistleblower's identity' section of a whistleblowing report form. At the top, there is a progress bar with four steps, where the second step is highlighted in green. The title 'Comunica Whistleblowing Snaitech WBL - Segnalazione Whistleblowing Dlgs. 24/2023 - Snaitech' is visible in the top right corner. The section title 'Whistleblower's identity' is followed by two questions. The first question is 'Do you want to provide your identity?\*' with a dropdown menu currently showing 'Choose your option'. The second question is 'What is your relationship with the Company?' with a dropdown menu currently showing 'Choose your option'. Below these questions is a text input field. At the bottom left, there is a 'BACK' button, and at the bottom right, there is a 'CONTINUE' button. A note at the bottom left states 'Fields marked with \* are mandatory'.

Comunica Whistleblowing Snaitech WBL - Segnalazione Whistleblowing Dlgs. 24/2023 - Snaitech

1 2 3

**Fill in your report**

What kind of malpractice do you want to report?\*

--- ▾

Description of events (describe what happened max 2000 characters)\*

When did the wrongdoing take place?\*

If known, who benefited from the wrongdoing?

If known, who has been harmed by the tort?

Do you know the economic dimension of the contract and/or act of corruption and/or transaction inherent in the reported wrongdoing?

What is the extent of your involvement in the incident in question?\*

I am not directly involved

I am directly involved

I have private interest

Do you have a private interest related to the acts or facts disclosed through the report?\*

Yes

No

## 4.2 Voice (or oral) signaling

It is possible for the reporting party to issue a vocal (or oral) report. Unlike the written report, there are no mandatory fields to fill in the report; However, the voice message can be recorded directly from the system using a specific function.

You will first be presented with an explanation screen on how to activate the functionality from the various electronic instruments.

Comunica Whistleblowing Snaitech WBL - Segnalazione Vocale Whistleblowing Dlgs. 24/2023 - Snaitech

1 2

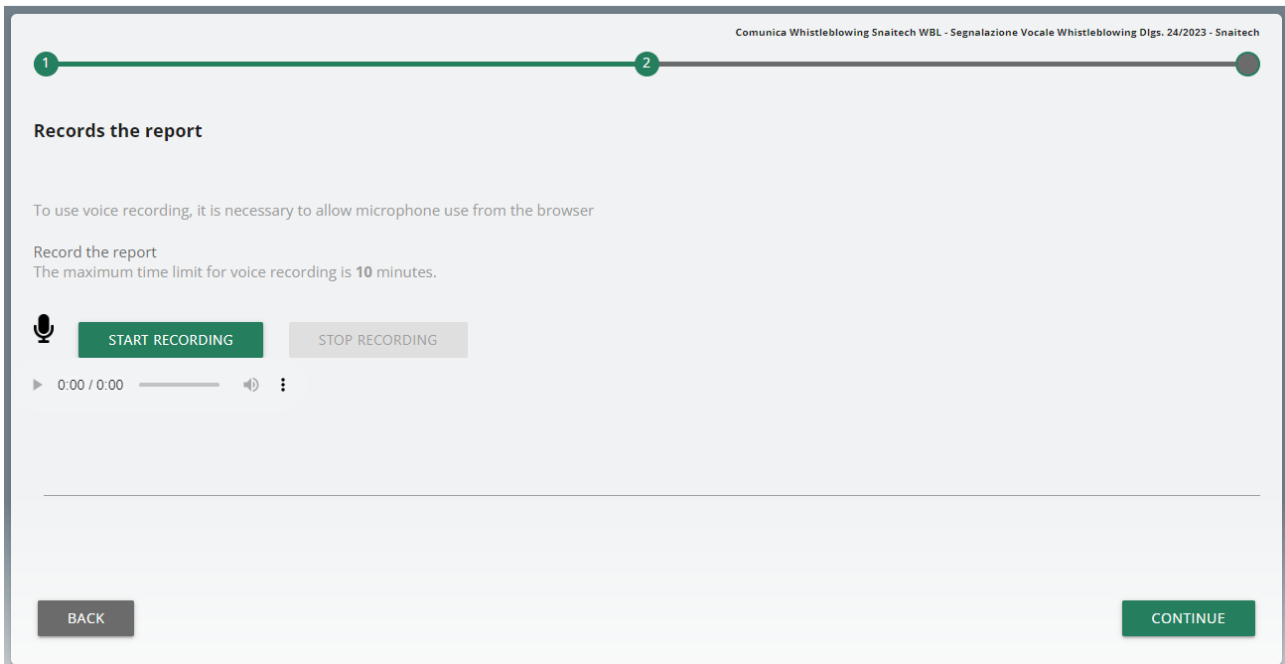
**Preliminary information**

The channel for oral reports involves recording the report directly from the system.  
In order to activate registration, it is necessary **to remember to authorize the use of audio systems (microphone, headphones) from the browser used.**  
If you are registering from mobile (cell phone), you need to change the settings of the application/browser used directly from the "Settings" menu.  
To recording will be made available for preview listening and, prior to submission, will be activated a **voice disguising mechanism** in order to make the vocal timbre unrecognizable.  
Please **spell out words clearly** and speak in an audible tone. **Unintelligible reports may be discarded.**

BACK CONTINUE

The report collection screen is then presented.





After enabling the use of the microphone from the browser, as suggested by the previous screen, simply click on the "Start recording" button to start recording the voice signal. During recording, the time remaining for the reporter to complete the report will be displayed.

At the end it will be possible to listen to the recording again using the play button on the bar below the record button.

When sending the report, a voice camouflage filter will be applied to the recording.

### 4.3 Report Preview

There is always a final preview section that shows the data collected in the previously compiled sections.

This section contains the send report button and a button to return to previous sections.

**NOTE: by clicking on the "SEND REPORT" button the report will be forwarded to the Manager and it will no longer be possible to modify the data entered or cancel the sending of the report.**

# Comunica Whistleblowing

Comunica Whistleblowing Snaitech WBL - Segnalazione Whistleblowing D.lgs. 24/2023 - Snaitech

1

2

3

## Data Preview

Which Directorate/BU/Function/Area of the company does the report relate to?

Business Unit Digital

Have you already reported the facts or acts in question to your manager or others?

Yes

If yes, what was the outcome?

Do you want to provide your identity?

I prefer to keep the report anonymous

Name

Surname

Tax Code

What is your relationship with the Company?

Employee

What kind of malpractice do you want to report?

Violations of the provisions of Legislative Decree No. 24/2023 (WB Decree)

Description of events (describe what happened max 2000 characters)

XXXXXX

When did the wrongdoing take place?

YYYYYY

If known, who benefited from the wrongdoing?

If known, who has been harmed by the tort?

Do you know the economic dimension of the contract and/or act of corruption and/or transaction inherent in the reported wrongdoing?

If known, who has been harmed by the tort?

Do you know the economic dimension of the contract and/or act of corruption and/or transaction inherent in the reported wrongdoing?

What is the extent of your involvement in the incident in question?

I am not directly involved

Do you have a private interest related to the acts or facts disclosed through the report?

No

Who are the people and/or business functions whose involvement in the incident is at issue?

BU Digital

What other companies or entities are involved?

Can you provide us with any useful information to verify the accuracy of the report?

Notes, if any

Attach relevant documents to the report

If you are aware of documents that would be useful for reporting, please indicate how the investigator might acquire these documents

BACK

SEND REPORT >

#### 4.4 Confirm sending report

Once the report has been sent, the system displays a confirmation page which will provide an identification code that allows the reporter to consult their report in the future.

**NOTE: It will be the user's responsibility to save and keep the code generated by the system in order to subsequently return to the application and check the status of the report itself (e.g. whether it has been taken care of, whether an investigation has been started, if there are messages from the Whistleblowing system manager in the system, if it has been archived, etc...)**

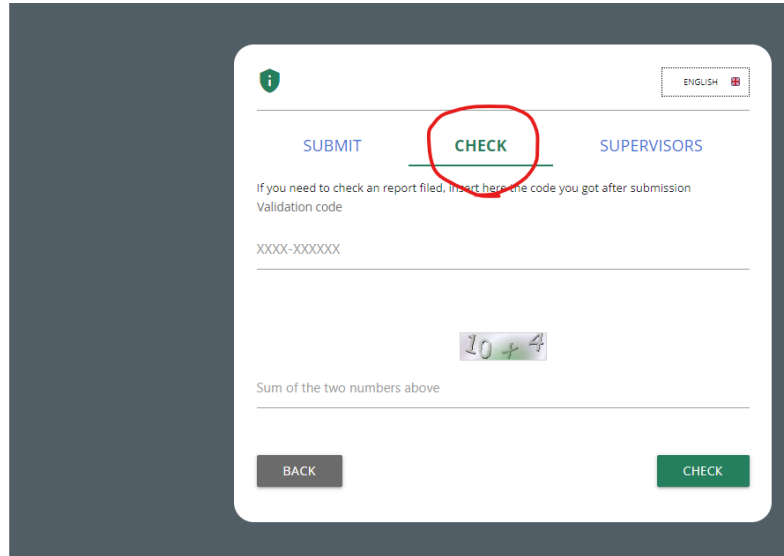
Below is an example of the screen:



## 5 Reporting consultation

To consult information relating to the status of their Report, the Reporter must return to the access page and click on the "CHECK" section (marked in red in the example image)

**SNAITECH**



Enter the code that was indicated on the report insertion confirmation page

Also complete the required security check.

### 5.1 Example consultation page

The Reporter can access this page to check the status of the Report and, specifically:

- (i) **Sent;**
- (ii) **Taking charge;**
- (iii) **Feedback.**

By clicking on the "View" button you can view your report and the responses given in the individual processing steps.

The screenshot displays a web interface for reporting whistleblowing. At the top, it says 'Comunica Whistleblowing Snaitech WBL - Segnalazione Whistleblowing Dlgs. 24/2023 - Snaitech: WBANAC\_11'. Below this, the submission date is '01/09/2023 17:17:05'. A table shows the message status:

Passaggio	DATA E ORA
Inviata	01/09/2023 17:17:05

Below the table, there is a section titled 'Messaggi con responsabili:' which contains the text 'Nessun Messaggio'. A button labeled 'IN VIA NUOVO' is visible. At the bottom left, there is a button 'VAI ALLA LOGIN'.

## 5.2 Features of the reporting consultation page

### 5.2.1 Key information

The screenshot shows a consultation page for a whistleblowing report. The main title is 'Segnalazione Whistleblowing: WB\_1' and the submission date is 'Data ora inserimento: 19/12/2022 15:50:44'.

The title in bold is made up of the report type and the Report Code

### 5.2.2 Save tab

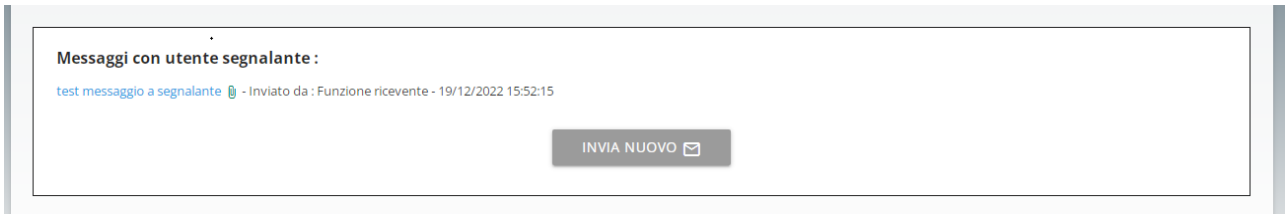


This option gives you the ability to save a working draft for the current step without moving to the next step, so that the partially filled data is available again when you resume working.

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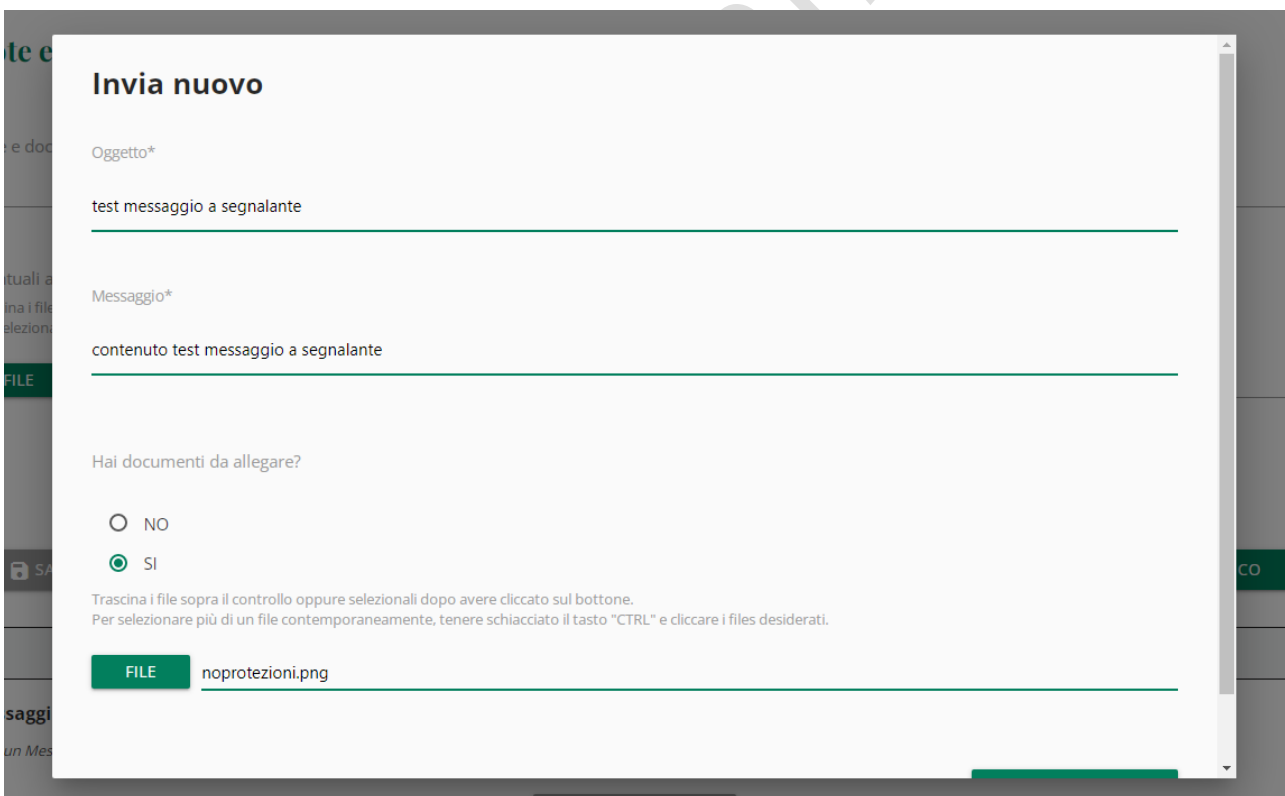
### 5.2.3 User messaging

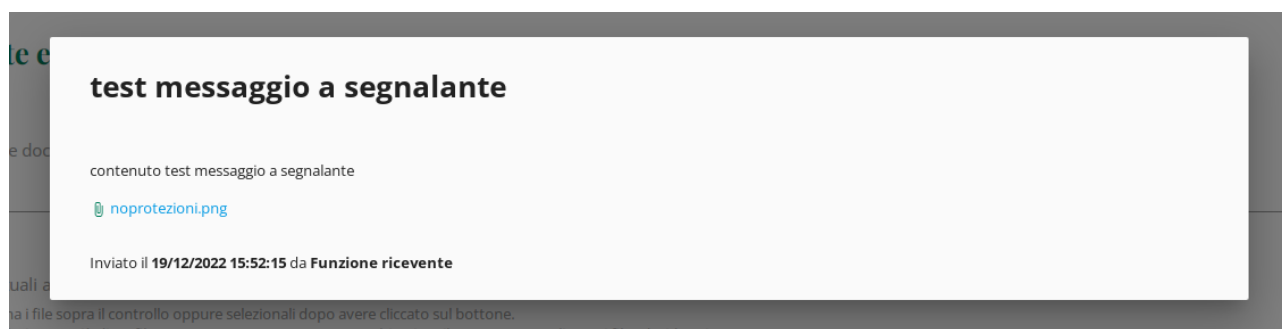
This functionality is available both for the reporting party and for all managers with permissions to view/edit the report.



Send message tab:

You can include attachments in your message.





Message saved with attachment.

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