

Whistleblowing in SNAITECH: FAQ

Does the Whistleblowing Decree apply to SNAITECH?

Yes, in continuity with the previous legislation, SNAITECH falls within the scope of application of Legislative Decree 24/2023 implementing Directive (EU) 2019/1937 on Whistleblowing.

Is there an Authority that guarantees the correctness of Whistleblowing systems?

The ANAC (National Anti-Corruption Authority) can be activated by the Whistleblower when the company has not activated the internal reporting channel (even if mandatory) or has reasonable grounds to believe that the report could result in an act of retaliation or the violation could constitute an imminent danger to the public interest.

Who can report a violation?

The reports referred to in Legislative Decree 24/2023 can be made by all employed workers, self-employed workers, freelancers, consultants, volunteers, interns, administrators and supervisory bodies.

Otherwise, the reports referred to in art. 48 of Legislative Decree 231/2007 - concerning the prevention of money laundering and terrorist financing phenomena - can be carried out exclusively by employees and persons in a comparable position.

What cases can be reported by the Whistleblower?

Any behaviour, act or omission that undermines the public interest or the integrity of the public administration or private company with reference to the provisions of Legislative Decree 24/2023, Legislative Decree 231/2001, of the organisation, management and control model of the Company and of the Anti-Corruption Policy of the Snaitech Group. The provisions regarding Whistleblowing do not apply to disputes, claims or requests linked to a personal interest of the reporting person which relate exclusively to their individual working relationships, even with hierarchically superior figures.

Who can be the subject of a report?

Anyone (both natural persons and legal entities).

Which channels should be used to report?

The internal reporting IT channel set up by the company and managed by a Whistleblowing Committee, which operates autonomously and with trained staff. Alternatively, it is possible to ask to meet the members of the Committee in person in order to make an oral report. To guarantee maximum confidentiality and effectiveness of the reports themselves, the use of the IT Channel is recommended as a preferential option.

The Reporter is given the opportunity to consult an Operational Manual which describes in detail the steps for submitting a Report via the IT Channel.

In what form should the report be submitted?

The report can be submitted in writing through the IT Channel, which allows both the completion of specific forms and the sending of voice messages with voice encryption. This report is always followed by an acknowledgment of receipt within seven days and a response within three months from the Committee responsible for managing the report.

It is also possible to make a "verbal" report through an in-person meeting with the Whistleblowing Committee or one of its members.

What protections are provided for the whistleblower?

- the identity of the reporter and any other information from which such identity can be deduced - directly or indirectly - cannot be revealed without the prior consent of the Reporter himself;
- any retaliatory act against the reporting party is to be considered null and void;
- The list of Third Sector bodies that provide whistleblowers with support measures such as: information, assistance and consultancy free of charge has been established at the ANAC;
- limitations of liability in the event of disclosure of information covered by an obligation of secrecy, for the protection of copyright or for the protection of personal data.

Are anonymous reports allowed?

SNAITECH - in compliance with the provisions of Legislative Decree 24 of 2023, as well as the ANAC Guidelines on the matter - allows both nominative and anonymous reports: the IT platform allows both reporting methods. Clearly, the protections are applicable only to whistleblowers who have revealed (even following the first conversation) their personal details which would in any case remain strictly reserved and confidential.