

BRANDART

PACKAGING & VISUAL MERCHANDISING SOLUTIONS

Procedure for managing whistleblowing reports

INNOVATING SUSTAINABLY



Annex C – Procedure for managing whistleblowing reports

Guidelines for sending internal reports through the platform

Purpose and scope

These Guidelines have been prepared in order to illustrate the methods that allow the Company to become aware of breaches of regulatory provisions that harm the public interest or the integrity of the organisation, in order to address any problem in a timely and resolute manner. To allow whistle-blowers to provide a report, the Company has adopted a digital communication channel ("*whistleblowing platform*") through which it is possible to notify that violations, illicit conduct, behaviours, acts or omissions that harm the public interest or the integrity of the Company that compose it have been committed.

Whistle-blowers can send reports using the digital platform made available by Brandart S.p.A., which can be consulted at the following link:

<https://whistleblowing.brandart.com/>

Please remember that this communication channel, from the moment the report is received and in every subsequent phase, ensures the confidentiality of the identity of the whistle-blower during the management activities of the report and, where chosen by the whistle-blower, his/her anonymity.

In any case, carrying out acts of retaliation or discrimination, either direct or indirect, against the whistle-blower and other protected individuals, for reasons connected, directly or indirectly, to the report, is expressly forbidden.

Start

1 On the home page, using this drop-down menu you can choose the platform language.



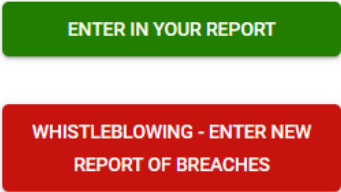
Welcome to the platform for the management of reports of offenses, follow the steps to enter a new report or view the reports already entered, in total confidentiality

To review your report information or get updates, enter the CODE and KEY here


Code _____ Key _____



Furthermore, if the user has already made a report and wishes to monitor its progress, he/she can do so by entering the alphanumeric code and key associated with the report which will be provided after making the report, and pressing on “*Enter the report*”



To insert a new report it is necessary to press on «*Insert new report*»



Start

1
bis

During this first phase, the user accesses the platform in order to make a new report and will have to select the **Company** for which he/she is making the report.

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All reports will be dealt with by the competent bodies; the report you are about to submit must be based on the detection of potentially illegal conduct and based on precise and consistent factual elements, of which you have come to know due to the working context. In any case, the competent body is required to maintain the confidentiality of the identity of the reporting party vis-à-vis the Company, except in cases expressly established by law (eg. Specific request by the Judicial Authority). This reporting channel ensures the confidentiality of your identity in reporting management activities. You can still choose to keep your anonymity and therefore the provision of personal data is to be understood as optional. However, this circumstance could nevertheless prejudice the investigation: anonymous reports, in fact, will be taken into consideration only if they are presented adequately detailed and made in great detail, in order to bring out facts and situations related to specific contexts. Finally, we remind you that the Company, as also required by the relevant legislation, has expressly provided for the prohibition of retaliation or discriminatory acts, direct or indirect, against anyone who makes a report for reasons connected, directly or indirectly, to the report itself.

Select the company of the Group to which your report relates.

Brandart S.p.A.

[LINK TO THE INFORMATION RELEASED IN ACCORDANCE WITH ART. 13 OF REGULATION \(EU\) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF SUBJECTS REPORTING OFFENSES](#)

[PROCEDURE FOR HANDLING WHISTLEBLOWING REPORTS](#)

I declare that I have read the information on the processing of personal data

It is important that the user reads the **privacy policy**.

Reporting channel

2

In this section, the user views the Reporting Committee (Direct Channel) of the Alternative Channel that will view and manage the report.

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Start Reporting channel Scope of the report Corporate Data Event Description Attachments Documents Send

The procedure provides for a preliminary assessment of the report carried out by:

Comitato di Segnalazione

Function/Role composed of:
Natoli Paolo (Membro del SPT)
Di Giorgi Giorgio (Presidente dell'Organismo di Vigilanza)
Bergamaschi Francesca (Responsabile Sostenibilità & Compliance)

Direct Channel and Reporting Manager:

Comitato di Segnalazione

Function/Role composed of:
Natoli Paolo (Membro del SPT)
Di Giorgi Giorgio (Presidente dell'Organismo di Vigilanza)
Bergamaschi Francesca (Responsabile Sostenibilità & Compliance)

Alternative Channel, if the report involves the Direct Channel Reporting Manager

Canale Alternativo

Function/Role composed of:
Andorno Roberta (Membro del SPT)
Mazzucchelli Monica (Membro esterno ODV)

The report concerns the role : Group Pre-Assessment Whistleblowing ? Comitato di Segnalazione

NO - CONTINUE WITH THE NORMAL PROCESS YES - SKIP THE PRE-ASSESSMENT

Pre-evaluation choice

The report concerns the Function of the Direct Channel function ? Comitato di Segnalazione

NO - CONTINUE WITH THE DIRECT CHANNEL YES - CONTINUE WITH THE ALTERNATIVE CHANNEL

In addition, the whistle-blower must indicate whether he/she wishes to proceed with the Direct Channel or with the Alternative Channel should the report concern Direct individuals and/or Recipients.

Scope of the report

3

In this section the user must select the category of individuals to which he/she belongs.

The categories to choose from are:

- Employees (including during the probationary period)
- Collaborators
- Consultants
- Former employees
- Candidates
- Trainees, interns
- Shareholders
- Associates
- Members of the administrative, management or supervisory body, including non-executive directors
- Suppliers or employees of suppliers
- Contractors or employees of contractors
- Subcontractors or employees of subcontractors
- Volunteers
- Other

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Category of the reporting party

Former employees

Main subject of the report

Violations

Infringements falling within the scope of the Union acts set out in the Annex in respect of the following areas

Food and feed safety and animal health and welfare

Furthermore, the reporting party must select the subject of the report.

Corporate Data

4

In this section, the user must select the Company Area involved in the report



Company Area ▼

Main subjects involved in the report

	ADD	Name	Surname	Role
1		<input type="text"/>	<input type="text"/>	<input type="text"/>

In addition, the whistle-blower has the possibility to report the Main Individuals involved in the report, indicating Name, Surname and Position.

Event Description

5

In this section, the user can request a meeting with the reporting committee, enter a description of the event that he/she witnessed and wants to report via the platform. The description can be textual or through a voice recording.

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UK

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Start Reporting channel Scope of the report Corporate Data **Event Description** Attachments Documents Send

You can enter a text description of the event or ask for a direct meeting or proceed with a voice recording

If you want to proceed with the voice recording, we point out that no filters or distortions of any kind will be applied to your voice.

I authorize voice recording

Enter a brief description of the event

IMPORTANT: no filters or distortions of any kind are applied to the voice if a recording is made.

Attachments

6

In this section the user can attach any useful documents to further contextualise the report.

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Start



Reporting channel



Scope of the report



Corporate Data



Event Description



Attachments



Documents



Send

In this section you can attach useful documents to substantiate your report

ADD

Documents

7

In this section, the user may indicate whether he or she is aware of any documents useful for reporting that he or she does not have in his or her possession, as well as specify where they can be found.

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I am aware of documents useful for reporting filed in

Indicate where the documents are stored

Reachable in the following ways

Indicate link or path to reach document folder

Indicate another method (ex: summon responsible person xyz)

The facts have already been reported to another authority or internal entity

- Yes
- No

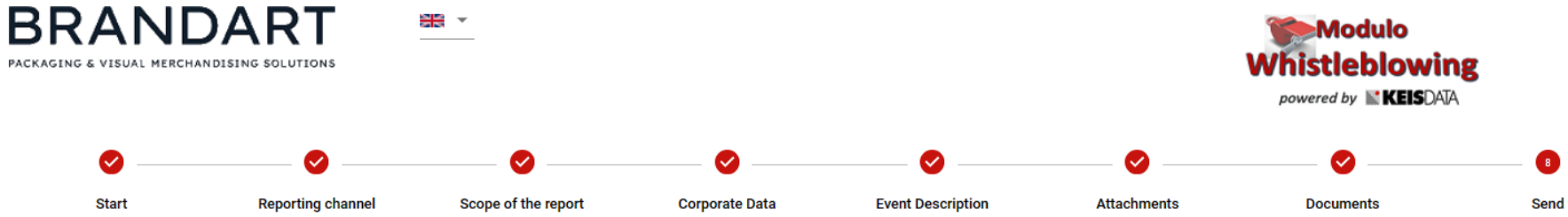


In addition, the whistleblower may report whether he or she has already reported the offence to another internal person or authority.

Send

8

In the last screen, the user is asked to confirm his/her willingness to transmit the report, as well as the possibility of providing their identification data.



Please note that the competent body that will take charge of the report is required to maintain the confidentiality of the identity of the whistleblower vis-à-vis the Company, except in cases expressly established by law (for example, upon specific request by the Judicial Authority).

Do you want to send your contacts to the Reporting Manager?

- Yes
- No

Name _____

Surname _____

Email _____

Phone _____

PLEASE NOTE that this communication channel, from the moment the report is received and in every subsequent phase, ensures not only the confidentiality of the identity of the person making the report during the management activities of the report, but also his/her anonymity if the whistle-blower does not wish to

Assignment of alphanumeric code and key

8



Once the report has been completed, the platform will issue the alphanumeric code of the report and the related key to the whistle-blower.

MAKE SURE YOU KEEP BOTH THE CODE AND THE KEY!!!

The Code and the Key are essential to be able to monitor the progress of the report and to respond to any requests for clarification or integration of the information.