



OFFICINE AMBROGIO MELESI & C. S.R.L.

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Cap.Soc./Share Cap. €500.000 i.v.
P.IVA - C.F. - R.I. Lecco:
IT 00231630138
R.E.A. n. LC-108835
N.Mecc./Export n. LC005895



FAQ WHISTLEBLOWING PLATFORM

What is Whistleblowing?

Whistleblowing is the institution that protects those who report, in the context of the organization to which they belong, irregularities or situations of danger or risk such as to cause damage to the entity to which they belong or to third parties.

Legislative Decree N. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 on Whistleblowing, introduced a uniform regulation of reporting channels and the protections granted to whistleblowers in the public and private sectors, including OFFICINE AMBROGIO MELESI & C. S.r.l.

Who can report a violation?

Anyone can make a report, including employees, former employees and job candidates, partners, customers, partners, suppliers (including under contracting/subcontracting), self-employed workers or holders of collaboration relationships, freelancers, consultants, agents and intermediaries, volunteers and trainees (paid or unpaid), or anyone who is a legitimate stakeholder in the business activity of OFFICINE AMBROGIO MELESI & C. S.r.l.

What can be reported?

Any conduct, act or omission committed or which, on the basis of concrete evidence, could be committed, as well as conduct, including omissions, aimed at concealing such violations.

Information may be reported to the staff of OFFICINE AMBROGIO MELESI & C. S.r.l. and/or third parties relating to violations of laws and regulations, the Code of Ethics and Conduct, as well as the system of rules and procedures in force in the company. **This does not include commercial complaints and disputes or requests related to personal interests for which dedicated channels are available.**

It is important that the report is adequately detailed, i.e. that it has a sufficient degree of detail, at least abstractly, to bring out precise and consistent circumstances and facts related to specific contexts, as well as to allow the identification of useful elements for the purpose of verifying the validity of the report itself (e.g. elements that allow the identification of the parties involved, the context, place and time period of the reported facts and supporting documentation).

Which channels should be used to report?

These are the internal reporting channels set up by OFFICINE AMBROGIO MELESI & C. S.r.l., indicated on the page dedicated to "Whistleblowing" on the company website.

The preferential channel is the IT one, as it guarantees the maximum confidentiality of the identity of the whistleblower through the use of secure protocols and encryption tools. It is also possible to send a report by ordinary mail or a specific request for an oral interview.

How can I access the Whistleblowing Platform?

The IT channel can be accessed from the "Whistleblowing" page on the company website.

At the end of the entry, the whistleblower must write down the date and the Unique Identification Code (alphanumeric ticket that uniquely identifies the report), automatically produced by the platform, which allows



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you to follow the processing status of the report over time as well as send and receive communications (even anonymously). It is possible to attach documentation to support the report, even after it has been sent.

Who receives the reports?

Reports are received by a third party identified by OFFICINE AMBROGIO MELESI & C. S.r.l., with characteristics of autonomy and independence, as Manager of the whistleblowing management process as governed by the Whistleblowing Procedure, with the support of the Whistleblowing Committee.

Within 7 days of receipt of the report, an acknowledgement of receipt shall be given to the whistleblower and within 3 months of such notice (or, in the absence of such notice, within 3 months of the expiry of the 7-day period from the submission of the same), a response shall be provided with information on the follow-up that is given or intended to be given to the report, specifying whether or not the report falls within the scope of application of Legislative Decree n. 24 of 10 March 2023.

I have received a report from a third party, what should I do?

Whoever receives a report, in any form (written or oral), must promptly transmit it, and in any case within 7 days of its receipt, to the reference Manager, also through the Whistleblowing Committee, through the internal reporting channels, simultaneously giving notice of the transmission to the whistleblower (if known) and guaranteeing absolute confidentiality. Must transmit the original of the report, including any supporting documentation, as well as evidence of the communication to the whistleblower that the report has been forwarded. It cannot retain a copy of the original and must delete any copies in digital format, refraining from undertaking any independent initiative of analysis and/or in-depth analysis.

Failure to communicate a report received as well as a breach of the duty of confidentiality constitute a breach of the Whistleblowing Procedure and may result in the adoption of disciplinary measures for employees.

What are the safeguards?

- Without prejudice to legal obligations, the identity of the whistleblower and any other information from which it may be inferred, directly or indirectly, such identity may not be revealed, without his express consent. Confidentiality is also guaranteed to the persons involved and/or mentioned in the report and to the facilitators (i.e., those who work in the same work context and assist the whistleblower in the reporting process).
- Any retaliatory act against the whistleblower is null and void. Anyone who believes they have suffered retaliation as a result of the report can notify ANAC. The protection measures, including the prohibition of retaliation, also extend to facilitators, colleagues and relatives of the whistleblower and legal entities connected to the whistleblower.
- Under certain conditions, there are limitations of liability in the event of disclosure of information covered by a duty of secrecy, for the protection of copyright or the protection of personal data.
- Third sector entities, registered in the list published on the ANAC website, provide whistleblowers with support measures (information, assistance and advice free of charge on how to report and on protection from retaliation).



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Are anonymous reports allowed?

It is also possible to submit a report anonymously. In this case, it will not be possible to trace the identity of the whistleblower.

The web platform allows you to establish a protected dialogue with the whistleblower (even anonymously), accessing through the date of the report and the Unique Identification Code generated when entering it.

The guarantees and safeguards apply only to whistleblowers who have revealed (even after the first conversation) their personal details, which are in any case covered by absolute confidentiality.

Is there an authority that guarantees the correctness of whistleblowing systems?

The ANAC (National Anti-Corruption Authority) can be activated if the internal channel is not active or is not compliant, if the whistleblower has made an internal report and has not received the acknowledgment of receipt and/or feedback on the follow-up given to the report or has reasonable grounds to believe (on the basis of concrete circumstances and information that can actually be acquired) that if he made an internal report to the same, effective follow-up would not be given or could retaliation or that the breach may constitute an imminent or obvious danger to the public interest.

ANAC provides an IT platform accessible from the institutional website. Through the same IT Platform, it is possible to notify ANAC of any retaliation that you believe you have suffered as a result of the report.