

Como, 14/12/2023

OGGETTO: WHISTLEBLOWING D. lgs 24/2023

Dear Customers, Suppliers, Employees, collaborators, partners and bearers of legitimate interest in the business activities of Italianpack SpA

Italianpack SpA, following the entry into force of D. lgs 24/2023 which applies to all companies above 50 employees and the voluntary introduction of the MOG (Model of Organization Management and Control Law 231), provides an internal channel to report information referable to staff and / or third parties relating to violations of laws and regulations as well as the system of corporate rules and procedures in force (MOG).

Thanks to the active and responsible participation of employees and third parties, reporting any non-compliant behavior enables Italianpack spa to identify any irregularities and adopt due corrective measures in a timely manner, preventing any economic or reputational damage.

This communication refers to the Whistleblowing procedure adopted by Italianpack SpA and available for consultation to employees on the Zucchetti portal and upon request for other stakeholders.

Who can report?

Employees, former employees, job applicants, partners, customers, suppliers, consultants, collaborators, associates and, more generally, anyone who is a legitimate bearer of an interest in the business activities of Italianpack SpA may send a report, even anonymously.

The report must be adequately substantiated, i.e., it must contain sufficient details to enable the reported facts to be ascertained (e.g., elements to identify the individuals involved, the context, place and time period of the reported facts, and supporting documentation).

How to report?

With specific reference to reports of violations reported on the MOG 231, the reporter may contact the Organismo di Vigilanza di Italianpack (OdV) provided for in Article 6 of Legislative Decree 231/2001, which has the task of supervising the functioning and observance of the MOG 231 model adopted, by:

- sending it to the email address: schiaffino.odv@amtfavvocati.it
- sending by regular mail to the address: Organismo di Vigilanza di Italianpack S.p.a., c/o AMTF Avvocati, via Arrigo Boito n. 8, 20121, Milan, to the attention of Avv. Gian Filippo Schiaffino.

Pursuant to and for the purposes of Art. 4 D. lgs. 24/2023, moreover, the Reporting may also take place by telephone lines. Specifically, the Reporting Party may contact the SB at the telephone number:

- + 39 02 89 09 65 18 c/o AMTF Avvocati Law Firm - Lawyer Gian Filippo Schiaffino.
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At the request of the reporting person, in addition, it may also take place mediate face-to-face meeting set within a reasonable period of time.

How are reports handled?

Legislative Decree No. 24 of March 10, 2023 (transposition of European Directive 2019/1937 on whistleblowing) introduced a unified regulation of reporting channels and protections afforded to whistleblowers in the public and private sectors.

The whistleblower, the facilitator, and the persons involved in the report are guaranteed absolute confidentiality.

In the case of anonymous reports, the report will be taken into consideration, but anonymity could significantly complicate the conduct of investigations and preclude taking necessary measures.

No form of personal or professional retaliation is permitted or tolerated because of the report made. If you believe that you have been retaliated against because of the report, you may report it to the National Anticorruption Authority (ANAC) through the IT Platform.

Following the report, the OdV, will be required to carry out the following activities:

- Issue, to the reporting person, within 7 days from the date of receipt, acknowledgement of receipt
- Maintain interlocutions with the reporting person
- Diligently follow up on the reports received
- Provide acknowledgement of the report within 3 months from the date of the acknowledgement of receipt

All processing of personal data is carried out in accordance with the legislation on the protection of personal data

ITALIANPACK SPA