

REPORTING (WHISTLEBLOWING)

WHO CAN REPORT

Persons who have had or have legal relations with SPICA as: employees of SPICA, self-employed person, freelancers and consultants, volunteers and trainees, shareholders and persons with administrative functions, management control and supervision or representation, applicant, test workers, relatives or co-workers of the complainant, employees or collaborators of contractual partners and suppliers of goods and services, entities owned by the reporting agent or operating in the same business environment as the reporting agent and are more specifically defined by art.3 of D.Lgs 10/03/2023, n.24.

WHAT TO REPORT

Reports shall relate to facts (of any nature, even if merely), already happened or that very likely could happen, relating to persons of SPICA and Third Parties who may be considered as unlawful, irregular or otherwise behaviour carried out in violation:

- of the Organization, Management and Control Model ex D.lgs. n. 231/2001, the Code of Ethics and the procedures that constitute its implementation;
- of laws, rules or internal regulations (e.g. on corruption, security, environment, etc.);
- and in any case tending to cause damage or prejudice, even just image or SPICA reputation.

Alerts must relate to facts of which the reporting agent has direct knowledge, having reasonable grounds to believe that the information reported is true at the time of disclosure.

WHAT CANNOT BE REPORTED

Excluded are communications, grievances, claims, instances having a subject different from those described. Reports must not relate to personal representations.

WHY REPORT

Reports of violations of Laws, of the Ethical Code the Anti-Corruption Policy or other protocols provided for in the control system can help SPICA to identify and deal with, with the application of appropriate measures, risk situations and scenarios to which it may be exposed.

HOW TO REPORT

The report can be made:

Through the reporting platform at the following link:

<https://whistleblowersoftware.com/secure/Spica> or with QR code on the side.

By sending a written report to the attention of the ODV of Spica Srl Via XXIV Maggio 1 – 21043 Castiglione Olona (VA) Through these channels you can request a direct meeting to the receiving function.

The "Reporting Guide" is available on the website <https://www.spica.eu> in the section Whistleblowing. When SPICA receives an alert:

- It informs the reporting agent that the problem

CONTENT OF THE REPORT

The reporting agent must provide all the elements necessary to carry out checks and investigations to assess the validity of the report. Must be reported:

- A clear and complete description of the facts reported in addition to the times and places of the event;
- Particulars or other elements identifying the person who has committed what was declared;
- Any other entity that may report on the reported facts;
- Any documents confirming the validity of the complaint;
- Any other information or evidence that may constitute a useful evidence of the existence of what was reported.

Notwithstanding that **reports can also be made anonymously**, in order to ensure adequate investigative activity, it is important that the reporting agent specifies his or her identity and the references necessary to be contacted, relying on the protection of its confidentiality by the recipient, as required by law.

PROTECTION OF THE SIGNALLER

The identity of the reporting person and any other information relating to the report, including those from which the identity of the reporting agent can be obtained, may not be disclosed to persons different than those responsible for following up such alerts in compliance with the applicable regulations, as provided by the Legislative Decree n. 24/2023.

Against the employee making a report under the procedure, no form of retaliation or discrimination affecting working conditions for reasons related to the alert is allowed, as provided by the Legislative Decree n. 24/2023.

WHAT SPICA DOES WHEN IT RECEIVES THE ALERT

reported has been taken over within 7 days from the date of receipt and of the possibility, in the case of insufficiently detailed communications, of collecting additional information/elements of which it is aware and/or he will be aware, in order to integrate/update the facts covered by the initial communication.

- Verify the reports received, to assess the related legal assumptions and the existence of the reported for the initiation of further investigation;
- **It provide feedback to the reporting agent within three months of the alert.**

QR Code for access on WEB Platform

