

POLITICS FRATELLI CALEGARO S.RL.

REPORTING OF OFFENCES REFERRED TO IN D. LGS. 24/2023

DATA: 22/10/2024

The reporting of an alleged wrongdoing, is a system of prevention of corruption through which the "informer" can report information, including substantiated suspicions, about violations committed or that, based on factual evidence, could be committed within the "Company" with which the "Reporting Party" or the person who makes a complaint to the judicial or accounting authority maintains a legal relationship, as well as elements concerning conduct aimed at concealing such violations.

Fratelli Calegario S.r.l. invites potential whistleblowers to carefully review the current legislation and the regulations below, following the instructions for a correct report, in order to ensure its success.

THE REGULATION: Information processing of personal data - WHO CAN REPORT

Specifically, the alert may be:

- the employees of **Fratelli Calegario S.r.l.**;
- the self-employed who work for **Fratelli Calegario S.r.l.**;
- employees, freelancers and consultants who provide their own business for **Fratelli Calegario S.r.l.**;
- volunteers and trainees who work for **Fratelli Calegario S.r.l.** **persons with functions of administration, management, control, supervision or representation of Fratelli Calegario S.r.l.**

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WHAT TO REPORT

- administrative, accounting, civil or criminal offences;
- Offences falling within the scope of EU acts in the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product security and compliance; Transport safety; Environmental protection; Radiation protection and nuclear safety; Food and feed safety and animal health and welfare; Public health; Consumer protection; Privacy and personal data protection and network and information system security;
- acts or omissions which harm the financial interests of the Union;
- acts or omissions affecting the internal market (for example, infringements of competition and State aid);
- acts or conduct which undermine the object or purpose of the provisions set out in Union acts.

HOW TO REPORT

- a. Internal Reporting;
- b. Report sent by e-mail;
- c. Notification by letter;
- d. Alert transmitted orally via voice mail;
- e. Oral report by direct comparison with Mr. Pietro Calegario
- f. External reporting
- g. Complaint to the judicial or accounting authority.



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INFORMATION PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF PERSONS WHO REPORT OFFENCES (ART. 54-BIS D.LGS. N. 165/2001)

LEGAL BASIS FOR PROCESSING

Personal data are processed by the Head of Corruption Prevention and Transparency in the performance of his tasks of public interest or otherwise related to the exercise of his public powers, with particular reference to the task of ascertaining any wrongdoing reported in the interest of the integrity of society, pursuant to art. 54-bis of the Law. N. 165/2001, by subjects who, due to their employment relationship with the company, become aware of illegal conduct, in particular:

- a. employees;
- b. workers and employees of firms supplying goods or services to the firm.

Alerts may be made to:

- a. employees;
- b. Employees and collaborators of companies supplying goods or services to the company, as well as other persons who interact with the company in various ways.

TYPES OF DATA PROCESSED AND PURPOSE OF PROCESSING

The data provided by the reporting person in order to represent the alleged unlawful conduct of which he has become aware due to his service relationship with the Company committed by subjects who in various ways interact with the same treaty are intended to carry out the necessary **investigative activities aimed at verifying the validity of the fact reported and the adoption of the consequent measures indicated in para. 5 of the instructions.**

The management and preliminary verification of the merits of the circumstances represented in the report are entrusted **to Mr. Pietro Calegario - owner of the business Fratelli Calegario S.r.l. - which provides you with respect to the principles of impartiality and confidentiality by carrying out any activity deemed appropriate**, including a personal hearing of the person issuing the alert and any other persons who may report on the reported facts.

If, as a result of the verification, there **are elements that do not show that the reported fact is unsubstantiated**, Mr. Pietro Calegario - owner of the business **Fratelli Calegario S.r.l.** will work for the adoption of the measures resulting from the competent bodies.

If Mr. Pietro Calegario - owner of the activity **Fratelli Calegario S.r.l.** must use internal or external staff to manage reporting practices, personal account for this activity is specially authorized to processing (art. 4, par. 10, 29, 32, par. 4 Regulation and art. 2 -quadeterdecies of the Privacy Code) personal data and, accordingly, said personnel must comply with the instructions given.

In any event, the fulfilment of this obligation by Mr. Pietro Calegario - owner of the business **Fratelli Calegario S.r.l.** and/or of the subjects who for reasons of service should know the identity of the reporter, of the legal obligations to which the right to anonymity of the reporter is not enforceable.



In a manner that nevertheless guarantees the confidentiality of the identity of the informer, Mr. Pietro Calegario - owner of the business **Fratelli Calegario S.r.l.** reports on the number of reports received and their progress in the annual report that is called to be written for the task performed with respect to the company.

The data collected will be stored in a form that allows the identification of interested parties for a period not exceeding the achievement of the purposes for which they are processed.

DATA SUBJECTS' RIGHTS

The data subjects have the right to obtain from the Company, in the cases provided for, access to their personal data and the rectification or deletion of the same or the limitation of the processing that concerns them or to oppose the processing (art. 15 et seq. of the Regulation). The appropriate request to the Head of Corruption and Transparency is submitted by contacting him at the Company.

RIGHT OF COMPLAINT

The interested parties who consider that the processing of personal data relating to them takes place in violation of what is provided by **EU Regulation 2016/679**, have the right to lodge a complaint, as **provided for by art. 77 of the Regulation itself**, or to **apply to the appropriate courts (art. 79 of the Regulation)** can be obtained from the national authority responsible for the protection of personal data www.garanteprivacy.it

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