



FONTANA GRUPPO

F A S T E N I N G T H E F U T U R E

WHISTLEBLOWING PROCEDURE SUMMARY

Below are the main topics covered in the Whistleblowing procedure adopted by companies belonging to the Fontana Gruppo, which is referred to for completeness of information.

1. INTRODUCTION

Companies belonging to the Fontana Gruppo ensure a working environment where it is possible to freely report any illicit behavior carried out within the Companies.

2. WHO CAN REPORT

Reports can be made by:

- A) Subordinate workers of private sector subjects;
- B) Self-employed workers;
- C) Workers and collaborators providing goods or services or carrying out work for third parties;
- D) Freelancers and consultants;
- E) Volunteers and interns;
- F) Shareholders and individuals with administrative, managerial, supervisory, oversight, or representational functions (from now on collectively referred to as "Recipients").

In addition, the above-mentioned subjects can make reports:

- when the legal relationship has not yet begun if information on violations has been acquired during the selection process or at other pre-contractual stage;
- during the probationary period;
- after the dissolution of the legal relationship if information on violations has been acquired during the relationship itself.



3. WHAT CAN BE REPORTED

Behaviors, acts, or omissions that harm public interest or the integrity of the Company and consist of:

1. Unlawful conduct, relevant under Legislative Decree no. 231/2001, or violations of the Organization, Management and Control Model;
2. Offenses falling within the scope of application of the European Union or national acts relating to the following sectors:
 - Public procurement;
 - Financial services, products, and markets, and prevention of money laundering and terrorism financing;
 - Product safety and compliance;
 - Transport safety;
 - Environmental protection;
 - Radiological protection and nuclear safety;
 - Food and feed safety and animal health and welfare;
 - Public health;
 - Consumer protection;
 - Privacy protection and personal data protection and security of networks and information systems;
3. Acts or omissions harming the financial interests of the European Union under Article 325 of the Treaty on the Functioning of the European Union;
4. Acts or omissions concerning the internal market, under Article 26, paragraph 2, of the Treaty on the Functioning of the European Union;
5. Acts or behaviors undermining the purpose or objectives of provisions of European Union acts.



4. CINTERNAL REPORTING CHANNELS ACTIVATED BY THE ORGANIZATION

4.1 HOW TO SEND THE REPORT

Channel Form (written or oral)	Reporting Channel Description	Address	Recipient and Manager of Report
Written	- Registered letter	To be sent c/o Star srl, Via Piave n. 20, 22060 Cabiato (CO)	Ing. Giorgio Penati
Oral	- Direct meeting with Reporting Manager - Telephone contact during working hours	To be requested by regi- stered letter c/o Star srl, Via Piave n. 20, 22060 Cabiato (CO) Tel: 3453798295	Ing. Giorgio Penati Dott. Andrea Zanini

4.2 REPORT CONTENT

- Circumstances of the time and place in which the reported fact occurred;
- Description of the fact;
- Personal details or other elements allowing identification of the subject to whom the reported facts can be attributed.



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4.3 REPORT MANAGEMENT PROCESS

1) Receipt of reports: the recipient records the report and, within 7 (seven) days of receipt, sends the reporter an acknowledgment of receipt;

2) Preliminary analysis of reports: aimed at verifying the “admissibility” of the report. If positive, the process moves to the next phase. Otherwise, the report will be archived;

3) Inquiry phase (investigation of reports): specific analyses are initiated, also involving other interested company figures or external specialists, if necessary, requesting further information from the reporter.

4) Closure of reports: archiving of the report or sending the report to internal bodies or judicial authorities for any measures taken.

Within 3 (three) months from the date of communication of the acknowledgment of receipt or, in the absence of this acknowledgment, within 3 (three) months from the expiry of 7 (seven) days from the submission of the report, the reporting manager will provide feedback to the reporter.

5. ADDITIONAL REPORTING CHANNELS

NB: before resorting to external reporting channels, the reporter must make a report through the internal channels mentioned above.

ONLY under certain conditions (for example failure to establish an internal reporting channel or inadequate internal channel, the previous report made through the internal channel without result, well-founded fears of retaliation), the reporter may access external channels in the following order:

- External reporting channel activated by ANAC, portal accessible at the following link: <https://whistleblowing.anticorruzione.it/#/#%2F>
- Public disclosure
- Report to the judicial authority



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6. WHISTLEBLOWER PROTECTION

- **CONFIDENTIALITY:** confidentiality of the whistleblower's identity, the person involved, and anyone mentioned in the report, as well as the content of the report and related documentation.
- **PROTECTION MEASURES:** any form of retaliation against the whistleblower is prohibited (e.g., any dismissal resulting from the report is null and void).
- **SUPPORT MEASURES:** a public list of Third Sector entities can be found on the ANAC website that provide whistleblowers with support measures, including information, assistance, and advice on:
 - Reporting procedures;
 - Protection against retaliation;
 - Rights of the person involved;
 - Procedures and conditions for accessing state-funded legal representation.