

FAQ – Whistleblowing

Guide to the correct reporting of offences

The L. 60/2016 «*Whistleblowing and protection of the Whistleblower*» lays down rules on whistleblowing with regard to dubious conduct or practice of corruption by whistleblowers in the public and private sectors, the mechanisms for the protection of whistleblowers and the obligations of public authorities and private entities regarding whistleblowing.

What is Whistleblowing?

It is the reporting of acts and omissions prohibited by law of which the reporting agent has become aware within its working context.

Who can report?

- ▶ Employees of Fiber Group Sh.p.k. regardless of employment contract;
- ▶ Self-employed persons, self-employed persons and consultants working for Fiber Group Sh.p.k.;
- ▶ Company personnel with the function of administration, management, control, supervision or representation;
- ▶ Former employees and employees whose employment relationship has not yet started or candidates for whom the recruitment phase is still ongoing.

When can you report?

- ▶ **Before** the legal relationship materialises, whether information on infringements was acquired during the selection process or at other pre-contractual stages;
- ▶ **During** the probationary period or working relationship;
- ▶ **After** the termination of the legal relationship if the information on the breaches has been acquired during the course of the relationship.

Who receives the report?

The report of wrongdoing is handled by the company office responsible for Fiber Group Sh.p.k.

For reasons of completeness, it should be noted that the report can be sent through the use of the dedicated platform on the Company's institutional website and without order of preference, also to the High Inspectorate for the Declaration and Review of Property and Conflicts of Interest (HIDAACI)

What can be reported?

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| Commission or omission committed by persons within the meaning of Fiber Group Sh.p.k. | ✓ |
| Violations of the Code of Ethics and Conduct of the Fiber Group Sh.p.k. and the procedures that constitute its implementation | ✓ |
| Mere suspicions or rumors, personal grievances of the complainant | X |
| Administrative, accounting, civil or criminal offences | ✓ |
| Claims relating to the employment or cooperation relationship and with superiors or colleagues | X |

The alerts must concern facts of which the reporting agent is aware, as well as having reasonable grounds to believe that the information reported is true at the time of the alert. Reports must be made in good time with regard to knowledge of the facts in order to make it possible to verify them in practice.

Why make a report?

Because the company can benefit from advanced reporting. Through it, the company can in time identify and remedy potential wrongdoing that may harm the interests and integrity of the Company and third parties.

What are the ways to send a report?

Whistleblowing reporting can be submitted :

- ▶ **online**, via Computer platform accessible from the website of the Fiber Group Sh.p.k. - <https://fiber.whblowing.it>;

The IT channel is to be considered as a priority as it is suitable to guarantee, by computer mode, the confidentiality of the identity of the signaller and adequate information security measures;

- ▶ By downloading the «Model for reporting illegal conduct» in the Governance section of the company website and sending it to the email address ethicspoint@wearefiber.com;
- ▶ by **Post**: to the address of Fiber Group Sh.p.k.

Are anonymous reports allowed?

- The Fiber Group Sh.p.k. through the Whistleblowing platform allows the signaller to proceed with both nominative and anonymous reports.

The Company wishes to make known in the reports the identity of the reporting agent, whose confidentiality is guaranteed in compliance with current legislation, in order to facilitate the verification of the reported facts and inform the reporting agent about the results of the investigations carried out.

In any case, the identity of the reporting agent will remain confidential.

Who gets the reports?

The reports sent by means of this platform are received by the responsible Business Area that deals with the management of reports of wrongdoing, which will promptly take charge of the same while giving notice to the Management.

What safeguards for the complainant?

The identity of the person issuing the alert and any other information from which that identity may be inferred, directly or indirectly, may not be disclosed without his or her express consent;

- ▶ any act of retaliation against the notifier shall be void;
- ▶ limitations of liability in the event of disclosure of information covered by the obligation of secrecy, copyright or the protection of personal data.

By whom and how is the report handled?

The report is managed by the responsible Corporate Area appointed by the Management Board of Fiber Group Sh.p.k. to manage illicit reports in close and prompt collaboration with the Management.

How to check the progress of the report?

The report comes directly to the responsible business area that takes care of it.

When sending the report, the reporting agent receives the private key (16-digit code) through the use of which he can at any time verify the status of the report and communicate with the responsible business area that deals with the management of the same.

The business area in charge keeps the interlocations with the reporting entity and, if necessary, asks for clarifications or additions to the same and/or to any other parties involved in the report, with the adoption of the necessary precautions.

Within and no later than 40 days from the arrival of the report, the business area responsible for the management shall provide feedback to the reporting company regarding the assessment activities. In the following 30 days, the responsible Business Area will provide the reporting company with feedback on the measures planned, taken or to be taken in order to follow up the report and the reasons for the choice made.

What protection does the Whistleblower have?

The signaller is guaranteed protection and protection, including through anonymity, against any form of discrimination that could arise directly and indirectly from the report of wrongdoing. The identity data of the signaller shall be encrypted together with the content of the alert.

The Fiber Group Sh.p.k. in order to encourage recipients to promptly report possible unlawful behaviour or irregularities, it shall ensure the anonymity and confidentiality of the report and the data contained therein, even in the event that it proves to be incorrect or unfounded following the checks carried out.

The identity of the alerter may not be disclosed to persons other than those competent to receive or respond to alerts; Moreover, the prohibition to reveal the identity of the whistleblower is to be defined not only to the name of the signaler but also to all elements of the report, from which the identification of the signaler can be derived, even indirectly.

How is protection guaranteed against libelous or defamatory reports?

Libellous or defamatory reports are prohibited and sanctioned by law and by disciplinary action by the Company.

How is personal data processed?

The personal data of the persons involved are processed for the purposes of this Act. The processing of such data will always take place in accordance with the procedures provided by the law in force regarding the protection of personal data. Information on the purposes and methods of processing is available on the website of the Fiber Group Sh.p.k.