

Whistleblowing Policy

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1. Definitions

The company Fiber Group Sh.p.k. in order to provide the opportunity for employees, suppliers and users who use the services provided by the same, to report violations in accordance with Law 60/2016, Lists the key definitions that allow you to acquire the necessary knowledge of the legislation on whistleblowing.

In detail:

- "Fiber Group Sh.p.k." or "Company" means **"Fiber Group Sh.p.k."**;
- **"Breach"** means any action or omission that results in an infringement:
 - o or the policies and procedures of the Company Fiber Group Sh.p.k. including the Code of Ethics and Conduct adopted by the Company Fiber Group Sh.p.k. ;
 - o of Public Interest;
 - o of any action or omission that may be reported as falling within the Whistleblowing legislation.
- **"Business Associate/s"** means any:
 - o current or previous employee, worker, consultant or self-employed professional of the company;
 - o an entity exercising a management, supervisory or representative function within the company;
 - o applicants for a job in **Fiber Group Sh.p.k.** even if the application was rejected;
- "Subject Involved" means the natural or legal person to whom reference is made with regard to a public report or disclosure as the subject to whom the Breach is attributed or to whom the subject is associated;
- **"Report"** means the written disclosure of information regarding any Breach;
- **"Reporting"** means any natural or legal person included in the Whistleblowing Regulation who presents or intends to submit a report using the **Whistleblowing Fiber Group Sh.p.k** Platform. or external signalling channels;
- **"Retaliation"** means any direct or non-direct action or threat by the organisation which is discriminatory or disciplinary in nature or which otherwise unfairly prejudices the legitimate interest of the whistleblower and which emerges from whistleblowing;
- "Whistleblowing Regulation" means Law 60/2016 approved on 02/06/2016, as well as any law applicable to this Company Policy on Whistleblowing and its contents;
- **"Whistleblowing System"** means measures, the organizational and technical tools and policies implemented by the Company to ensure compliance with the Whistleblowing Regulation and concerning the reporting of information useful for the protection of the well-being and reputation of the Company and third parties. The Whistleblowing System consists of the internal channels of the organization;
- **"Work context"** means any current or past work activity through or in the context of which, regardless of its nature, a person may acquire information about the Violations and within which that person may be retaliated if he or she reports them;
- **"Corruption"** means any illegal conduct or omission under effective criminal law with regard to any form of active or passive corruption;
- **"HIDAACI"** means the High Inspectorate for the Declaration and Review of Property and Conflicts of Interest.

2. Subject matter and scope

This Corporate Whistleblowing Policy concerns the promotion of the correct use of the **Whistleblowing Platform** implemented by **Fiber Group Sh.p.k.** in order to promote an increasingly corporate culture based on the principles of accountability, transparency, respect for diversity, inclusiveness, fairness and integrity, in line with the Code of Ethics and Conduct. The same applies to company collaborators, signallers and persons involved in different capacities in the work activities provided by the **Fiber Group Sh.p.k.**

3. Introduction

In every organizational context of the company, there can be illegal, unethical and discriminatory situations, which can take many forms: situations of corruption, fraud, inexperience, cases of harassment and negligence. Similar situations if not addressed, can cause serious harm to the organization, its employees and, in some cases, even the public interest.

The Company has implemented a Platform for reporting wrongdoing in order to encourage reporting of genuine information or concerns about (potential) violations or wrongdoing, which is the essence of Whistleblowing.

The purpose of this Platform is to prevent damage and detect threats to the organization, as well as to ensure the integrity and good reputation of third parties. Therefore, it must be used freely, in good faith, on a voluntary basis and exclusively for such purposes.

The Company through this Company Policy intends to inform the recipients as indicated above, to use internal reporting channels and to refrain from any public disclosure of such information.

4. Signalling system

4.1. How to submit an alert

The signaller may decide to use the Whistleblowing Platform by submitting a report:

- anonymously, or
- indicating your identity and contact details.

4.2. What to report

The report shall include information on concerns and/or reasonable suspicions about actual or potential infringements that the reporting agent has become aware of in the workplace.

Examples of reported offences are:

- a) violation of the Code of Ethics and Conduct;
- b) breach of internal company regulations capable of causing damage or prejudice, even of image or reputation, to the organization.

4.3. What cannot be reported

Facts, documents and information, whatever their form or support, the disclosure or disclosure of which is prohibited by the provisions on national secrecy, medical secrecy, secrecy of judicial deliberations, secrecy of investigations or judicial investigation or professional secrecy of the lawyer are excluded from the scope of this Company Policy and therefore cannot be reported through the Whistleblowing Platform.

4.4. Requirements for reporting

The alert shall meet the requirements of:

- the merits and consistency of the facts;
- sufficient clarity, and
- the concrete nature of the evidence.

If the Report is not sufficiently detailed and the Company is not able to contact the reporting agent in order to collect further information about it, it may not be possible to continue the investigation with a view to further clarifying the issue raised.

5. Signal channels

5.1. Internal signal channels

The reporting agent may submit the report via internal channel, in written form, in one of the following ways:

- Online through the "**Whistleblowing Fiber Group Sh.p.k.**" platform available at fiber.whblowing.it.
- By sending the "**Model for reporting illegal conduct**" downloadable in the Governance section of the company website to the dedicated e-mail address ethicspoint@wearefiber.com.

5.2. External signal channels

Given the Company's commitment to creating a secure Whistleblowing Platform, which can collect the reports of those who have assisted or have been the recipients of illegal behaviour, in order to encourage them to use internal reporting channels, the person who has:

- an alert has already been submitted through internal channels but has not received a reply or has not been followed up by the organisation;
- reasonable grounds for believing that an internal alert would not have been followed effectively or could have entailed the risk of retaliation;
- reasonable grounds for believing that the Breach it intends to report may constitute an imminent or manifest danger to the public interest;

may use the external reporting channel managed by the High Inspectorate for the Declaration and Review of Assets and Conflicts of Interest (HIDAACI).

5.3. How the report will be handled

Upon receipt of the alert, the administrative investigation will begin, which must be completed as soon as possible, in any case within forty days from the date of the opening of the investigation, unless circumstances require a longer period.

During that period the responsible business unit, or HIDAACI, shall examine and assess the allegations made by the complainant. They may also ask for additional information and documents, order inspections or analyses, collect testimonials or consult experts in various fields.

Within 30 days of the implementation of the measure, the responsible business unit or HIDAACI shall notify the whistleblower of any action taken in response to the alert.

The reports will be managed by the responsible business unit that will proceed:

- a preliminary analysis of the report to ensure that it meets the requirements of the company policy, supported by accurate and consistent facts and is sufficiently detailed. If necessary, the Reporting Party will be asked for further information on the circumstances of the Reporting;
- an assessment of the competences in order to assess the subject-matter of the alert in order to forward it to the competent entity. In particular:
 - o the Company is responsible for reporting ethical or compliance violations in Fiber Group Sh.p.k.;
 - o reports of a different nature will be evaluated on a case-by-case basis and according to the needs of knowledge in order to identify the competent function;

Sufficiently detailed reports managed through the Whistleblowing Platform will be managed as:

- "Investigation": the business contacts identified to put in place the investigative measures they deem most appropriate will evaluate the validity of the reported facts and will inform the Company Property of the illegal reports and the investigation conducted, through a special report.

The Fiber Group Sh.p.k. will ensure a diligent and timely follow-up to the report and will provide a timely response to the reporting.

6. Guarantees

Regardless of the reporting channel used, the Company will grant the reporting agent the following guarantees:

- **"confidentiality"**: the Whistleblowing Platform, from reporting to the management of the same, including any outcome thereof, guarantees the utmost confidentiality:
 - o the identity of the alerter and of any third party mentioned in the alert (including the person involved), as well as any information from which the identity can be inferred. The Fiber Group Sh.p.k. will request the consent of the reporting party to disclose the identity of the reporting party;
 - o any other information protected under the Whistleblowing Regulation or other applicable laws.

Except where **Fiber Group Sh.p.k.** will be required by law to share such information or in which the reporting agent has no right to protection under the Whistleblowing Regulation (for example, in the event of conviction for false reporting), the protection of **confidentiality** will be throughout the reporting process, even during any disciplinary proceedings resulting from the alert.

Although disclosure of the identity of the whistleblower may be useful in disciplinary proceedings against the person involved or in a dispute, the Company will require the notifier's prior consent to disclosure.

- ***“non-retaliation”:*** *The Company shall take measures to protect the complainant from any retaliatory action taken against him for filing the alert. Retaliatory measures including any direct or indirect act or omission which occurs in the workplace and which causes or may cause adverse consequences at work (e.g. dismissal, suspension of office or from one or more tasks, transfer within or outside the organisation, negative merit notes, retrocessions in grade, promotion missed, pay reduction, unjustified transfer, etc.) or any behavior that may be qualified as "bullying", even if only attempted or threatened.*

The anti-retaliation protection also applies to:

- to natural and legal persons linked to the reporting agent according to the criteria laid down by the Whistleblowing Regulation;
- to any other person entitled to the same protection under the Whistleblowing Regulation.

The Fiber Group Sh.p.k. will apply the above guarantees to all whistleblowers, regardless of whether or not the alert falls within the scope of the Whistleblowing legislation. However, their protection in the presence of courts and authorities may vary depending on whether the report falls within the scope of the Whistleblowing Regulation. The person concerned who has become aware, for whatever reason, of the identity of the person issuing the alert must not have any contact with the person making the complaint, even if the involved subject believes that it is a mere misunderstanding that can be easily managed between them.

7. Data Protection

The processing of personal data in the management of reporting channels and reports received must be carried out in compliance with the GDPR and the applicable local data protection legislation. The **Fiber Group Sh.p.k.** has defined its own model for receiving and managing alerts, identifying appropriate technical and organisational measures to ensure a level of security appropriate to the specific risks arising from the processing carried out, on the basis of a data protection impact assessment. In particular, all parties involved in the receipt and management of reports have been properly briefed and bound to confidentiality. Whistleblowers and data subjects will be provided with adequate information in accordance with the General Data Protection Regulation (GDPR). The **Fiber Group Sh.p.k.** finally, undertakes not to collect or, if collected, to immediately delete personal data manifestly not useful for the processing of a specific report.

8. Disciplinary arrangements

The Fiber Group Sh.p.k. expects that company employees will cooperate in maintaining a working environment based on mutual respect for the dignity, integrity, transparency and reputation of all individuals, in line with the Code of Ethics and Conduct of society.

Therefore, any breach of this Company Policy will be sanctioned in proportion to its severity and in accordance with applicable laws, contractual provisions and applicable business regulations. Disciplinary sanctions may also be applied in case of spurious, reckless or bad faith reporting, within the limits allowed by the Whistleblowing legislation.

If the reporting agent submits a bona fide report and the investigation finds no evidence of wrongdoing, no disciplinary action shall be taken.

The Company reserves the right to report any criminal infringement to the competent judicial authorities.