	Approvata da: Direttore Generale	DATA DI EMISSIONE 12/01/2023	DATA ULTIMA REVISIONE 12/10/2023
	Policy <i>Whistleblowing</i> ai sensi dell'art. 6 del D.Lgs. 231/01		

## Reports of wrongdoing or irregularities – Whistleblowing

*The whistleblowing system of CERACARTA updated to D.lgs. 24/2023 "Protection of persons who report breaches of Union law and provisions concerning the protection of persons who report breaches of national regulatory provisions", has been made available to all interested parties. Prima di effettuare una segnalazione, è necessario leggere quanto segue per capire meglio cosa si può segnalare e come gestiremo la segnalazione.*

### **What are the reporting channels?**

- CERACARTA has made available for the reporting of illegal conduct by employees, collaborators, directors, members of the corporate bodies, and third parties (cd. whistleblower) the following channels:
- a computer platform, available at the following link: <https://whistleblowing.ceracarta.it>
- **by mail:** by registered mail with return receipt addressed to BOTTAZZI MIRELLA via Remo Tosi 5b - 40024 Castel San Pietro (BO), Domicile of the ODV

Through these channels, the Signaller may also request a direct meeting with the Company's Supervisory Body.

### **What can you report?**

There is no exhaustive list of potential offences that can be reported. In general, the facts and/or behaviour to be reported must have the potential to undermine the integrity and ethics of the company, must be in the **general interest** and not individual. They may be **anomalies, potential irregularities or potential crimes committed both in the interest and to the detriment of the Company**. You must have become/become aware of such wrongdoing within your business context.

**The reporting of wrongdoing must be perceived as an act of expression of civic sense that can facilitate the emergence of facts corrupting or otherwise detrimental to the integrity of the Company and the collective interest.** Through these channels, therefore, you can report:


- illegal conduct relevant pursuant to D.lgs. 231/2001 or violations of the Organization, Management and Control Model (also known as "Model 231");
- offences falling within the scope of European Union or national acts, acts or omissions affecting financial interests or affecting the internal market<sup>1</sup>.

### **What can't you report?**

However, questions of a personal nature or relating to the discipline of the employment relationship or relations with the hierarchical superior or with colleagues cannot be reported through this channel.

Alerts manifestly opportunistic and/ or made for the sole purpose of damaging the complaint or other subjects entails a liability and penalty of the Signalman.

<sup>1</sup> Per maggiori informazioni in relazione alle tematiche che possono essere oggetto di segnalazione, prendi visione del D.lgs. 24/2023, disponibile in [Gazzetta Ufficiale](#).

	Approvata da: Direttore Generale	DATA DI EMISSIONE 12/01/2023	DATA ULTIMA REVISIONE 12/10/2023
	Policy <i>Whistleblowing</i> ai sensi dell'art. 6 del D.Lgs. 231/01		

### Who will receive and investigate the report?

The report will be received by the Company Supervisory Body. Once the alert is received, an internal investigation will be opened to ascertain the facts subject to the report. It is therefore necessary to make alerts that are as detailed as possible and offer the greatest possible number of elements in order to allow the parliamentary bodies to carry out the necessary checks.

After reporting, you may be contacted/ to by those who took charge of the report during the internal investigation that is carrying out, for the request for clarification, in-depth analysis, documents or other, always respecting your confidentiality and ensuring effective management of the procedure.

Consistent with the confidentiality requirements of internal investigations and their outcome, you will be kept up to date/a on the course of the procedure.

### How does the IT platform available at this link work?

Once the IT platform is launched, available at the following link: <https://whistleblowing.ceracarta.it> will appear a reporting form that provides an indication of the type of illegal conduct, a set of data on time and place of events, the parties involved, the level of involvement and direct knowledge or otherwise of the facts by the/the reporting agent, the possible involvement of other informed parties. Even after you have sent your report, by accessing the platform you can continue to dialogue confidentially with the Company.

The reports and data that are entered in the platform can not be deleted: this to ensure that your report can not be deleted or changed by anyone: at any time you decide to access the platform, you can see the status of your report. However, it is important for you to know that the platform encrypts all the data entered by the/the reporter through the presence of a secure computer protocol (https). Your identity and the data you provide will therefore remain confidential for the duration of the investigation, but keep reading to better understand how we will process the data you share.

### Once the report is made, is my confidentiality protected?

CERACARTA is committed to ensuring that those who have made relevant reports, in a reasonable belief based on facts, are not subject to any kind of retaliation. In fact, specific measures have been provided for the protection of the Signaller, so that they are not subject to retaliation, discrimination or, in any case, penalties related to reporting. Those guarantees consist, on the one hand, of the prohibition of retaliation for alerts issued to the employer and, on the other hand, of the nullity of any retaliatory measures which may have been taken in breach of that prohibition.