

FAQ REPORTING PLATFORM

What is Whistleblowing?

Whistleblowing is the institution that protects those who report irregularities or situations of danger or risk within the organization to which they belong, which could prejudice the entity itself or third parties.

Legislative Decree of March 10, 2023, no. 24, implementing Directive (EU) 2019/1937 on Whistleblowing, introduced a unified discipline of reporting channels and protections recognized for whistleblowers in both the public and private sectors, including SOFTEAM S.p.A.

Who can report a violation?

Anyone can make a report, including employees, former employees, job candidates, partners, customers, suppliers (including subcontractors), freelancers, collaborators, consultants, agents, intermediaries, volunteers, and interns (paid or unpaid), or anyone with a legitimate interest in the business activities of SOFTEAM S.p.A.

What can be reported?

Any behavior, act, or omission committed or that could be committed based on concrete elements, as well as conduct, even omissive, aimed at concealing such violations.

Reports can cover information related to SOFTEAM S.p.A. personnel and/or third parties regarding violations of laws and regulations, the Code of Ethics and Conduct, as well as the current system of rules and procedures in the company. Commercial complaints, product or service disputes, or requests related to personal interests have specific dedicated channels.

It is important that the report is adequately detailed, meaning that it has a level of detail sufficient, at least abstractly, to bring out specific and concordant circumstances and facts related to specific contexts. This should also allow for the identification of elements useful for verifying the validity of the report (e.g., elements that allow for the identification of the parties involved, the context, the place and the timeframe of the reported facts, and supporting documentation).

Which channels should be used for reporting?

The internal reporting channels provided by SOFTEAM S.p.A. are indicated on the "Whistleblowing" page on the company website and respective intranet pages.

The preferred channel is electronic, ensuring maximum confidentiality through secure protocols and encryption. Reports can also be submitted via regular mail or oral communication.

How can I access the Reporting Portal?

The electronic channel is accessible from the "Whistleblowing" page on both the company website and respective intranet pages.

After submission, the whistleblower must note the date and the Unique Identifying Code (alphanumeric ticket uniquely identifying the report) automatically generated by the platform, allowing tracking of the report's status over time and communication (even anonymously).

It is possible to attach supporting documentation to the report, even after its submission.

Who receives the reports?

Reports are received by an external third party identified by SOFTEAM S.p.A. as the Manager of the reporting process, with autonomy and independence, as outlined in the Whistleblowing Procedure, supported by the Whistleblowing Committee.

Within 7 days of receiving the report, the whistleblower receives an acknowledgment, and within 3 months from that notice (or, in the absence of such notice, within 3 months from the expiration of the 7-day deadline from the report's submission), feedback is provided on the progress or intended actions regarding the report, specifying if it falls within the scope of Legislative Decree of March 10, 2023, no. 24.



I received a report from a third party, what should I do?

Anyone receiving a report in any form (written or oral) must promptly transmit it, within 7 days of receipt, to the designated Manager, also through the Whistleblowing Committee, using internal reporting channels. They must inform the whistleblower (if known) of the transmission and ensure absolute confidentiality. The original report, including any supporting documentation, must be transmitted, and evidence of communication to the whistleblower about forwarding the report must be provided. No copies can be retained, and any digital copies must be deleted, refraining from independent analysis and/or investigation initiatives.

The failure to communicate a received report and the violation of the confidentiality obligation constitute a violation of the Whistleblowing Procedure and may result in the adoption of disciplinary measures for employees.

What protections are provided?

- Subject to legal obligations, the identity of the whistleblower and any information revealing, directly or indirectly, this identity cannot be disclosed without their express consent.
- Any retaliatory act against the whistleblower is considered void. Those who believe they have suffered retaliation can report it to ANAC.
- Under certain conditions, liability limitations are provided in case of disclosure of information covered by secrecy obligations, protecting copyright or personal data.
- Third-sector entities listed on the ANAC website offer support to whistleblowers (information, assistance, and free consultations on reporting methods and protection from retaliation).

Are anonymous reports allowed?

Anonymous reports are possible. In such cases, the whistleblower's identity cannot be traced. The web platform allows a secure dialogue with the whistleblower (even anonymous) by accessing via the report date and the Unique Identifying Code generated during submission. Guarantees and protections apply only to whistleblowers who have disclosed their details (even after the initial interaction), which are covered by absolute confidentiality.

Is there an authority ensuring the correctness of Whistleblowing systems?

The National Anti-Corruption Authority (ANAC) can be activated if the internal channel is not active or compliant, if the whistleblower has made an internal report and has not received an acknowledgment and/or feedback on the report, or has reasonable grounds to believe (based on concrete circumstances and information actually obtainable) that making an internal report would not be effective or could result in retaliation, or that the violation may pose an imminent or obvious danger to public interest.

ANAC provides an online platform accessible from its institutional website. Through the same platform, whistleblowers can report any retaliation they believe they have suffered due to the report.