

SEGNALAZIONE DELLE VIOLAZIONI

All.1-PGS-19 Revisione: R0 del 15/12/2023

Redatto da: CQ

Verificato da: RQ

INTERNAL REPORTING CHANNEL

Fresh Ways S.r.l. has implemented a dedicated IT system (My Governance) for managing reports concerning:

violations of company procedures, internal manuals, the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, as well as violations of applicable laws and regulations, including unlawful acts, actions and omissions related to breaches of European legislation that harm the public interest or the integrity of the entity, as defined by Legislative Decree 24/2023;

conduct that violates the principles and/or behavioral standards outlined in the company's adopted Code of Ethics.

All reports received through the "My Governance" IT system will be analyzed by the competent personnel appointed by Fresh Ways. The whistleblower will be informed of the receipt of their report.

The platform, managed by a third-party provider, ensures the confidentiality of personal data, the whistleblower's identity and the content of the reports, subject to any legal obligations.

All members appointed by Fresh Ways are strictly prohibited from taking retaliatory or discriminatory actions against the whistleblower for reasons directly or indirectly related to the submitted report. Fresh Ways will impose disciplinary actions and/or other measures against individuals who make reports in bad faith or with gross negligence with the intent of damaging the reputation of those unjustly reported.

To access the platform, click here:

My Governance - v4.0

Communicate Whistleblowing: User Manual

Procedure for Managing Reports

EXTERNAL REPORTING CHANNEL

ANAC (National Anti-Corruption Authority) has activated an external reporting channel that whistleblowers can use under the conditions specified in Article 6 of Legislative Decree 24/2023.

Furthermore, whistleblowers who believe they have been subjected to retaliation following a report may notify ANAC as provided under Article 19 of Legislative Decree 24/2023. This allows ANAC to carry out the necessary investigations under the legislation and, if necessary, impose a sanction on the party responsible for the retaliatory action.

Access to the external reporting channel is available on ANAC's official website.