Reason for issue: First issue	Verified by: SG Fabio Castellano
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Attachments to the PdQ WB recalled

Code	Document Title
PdQ 09 A WB	“WB Information on the Processing of Personal Data”
PdQ 09 B WB	“Treatment Impact Assessment”

WB Registration Documents Recalled

Code	Document Title
DdR 09 A WB	Information for trade union representatives
DdR 09 B WB	Letter of assignment of the role of external member of the Reporting Management Body
DdR 09 C WB	Letter of assignment of role as internal member of the Reporting Management Body
DdR 09 D WB	Authorization for the processing of personal data of external member of the Management Body
DdR 09 E WB	Authorization for the processing of personal data of an internal member of the Management Body
DdR 09 F WB	Dedicated WEB site section
DdR 09 G WB	Employee information WB Management System

1. Premise

On 30 March 2023, Legislative Decree no. 24 of 10 March 2023 entered into force *, implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law and laying down provisions on the protection of persons reporting breaches of national legislation.*

The new regulation is aimed at creating a tool to combat and prevent corruption, mismanagement and, more generally, violations of the law, in the public and private sectors.

In order to guarantee the effectiveness of this legal safeguard and encourage its use, the Italian and European legislators have therefore wanted to strengthen the measures of protection from any possible retaliation of the subjects who make the reports or (where the conditions exist) the public disclosure and extend them also to anyone involved (as a facilitator, family member, confidant, colleague of the reporting person or simply a person mentioned) in the report, ensuring, among other things, the provision of systems that allow them to safely report any illicit acts of which they become aware.

The main innovations contained in the new regulation, which no longer makes distinctions between the public and private sectors, are summarised below:

- the expansion of the objective scope (type of reportable offences);
- the expansion of the subjective scope (number of subjects deserving of protection);
- the regulation of three different reporting channels: internal (in entities with a dedicated person or office or through an external subject with specific skills); external (managed by ANAC and subordinate to the internal channel); public disclosure (where the conditions exist, through the press or social media);
- the provision of different methods of submitting reports, in written or oral form and always with adequate guarantees in terms of security measures put in place to protect the confidentiality of communications.
- the detailed regulation of confidentiality obligations;
- protection impact assessment and the obligation of the Entity to adopt all technical (e.g. encryption) and organizational measures (e.g. information on processing, authorization and training of personnel, stipulation of processing agreements with suppliers, etc.) imposed by the data protection legislation in force, national (Legislative Decree 196/2003) and European (EU Reg. 2016/679 – General Data Protection) Regulation – “GDPR) in order to regulate the processing of personal data received, managed and communicated by third parties or to third parties;
- the expansion of the cases included in “retaliation” and the strengthening of the related protection measures, offered both by ANAC and by the judicial authority and more indications on the responsibility of the whistleblower and on the exculpatory circumstances;

- the introduction of specific support measures for reporting persons and the involvement for this purpose of third sector bodies with adequate skills and who provide their services free of charge;
- the revision of the discipline of sanctions applicable by ANAC and the introduction by private entities of sanctions in the disciplinary system adopted pursuant to Legislative Decree no. 231/2001.

In light of these premises, Medac Srl (hereinafter referred to as “Medac Srl”), in the spirit of giving concrete implementation to the legislation in question, after consulting the representatives and/or trade unions, has set up, for the purpose of making reports, a so-called “internal channel” - consisting of an IT platform that also integrates a voicemail box, as well as the possibility for the interested party to request a meeting in person - suitable for guaranteeing the confidentiality and protection of the whistleblower (and of any other subjects possibly involved) and has entrusted it to a Management Body (hereinafter also “Responsible Body”), autonomous and independent, adequately instructed and trained.

2. Scope

This “General Procedure for the Management of Reports” (hereinafter “Procedure”) aims to regulate the process of receiving, analyzing and managing Reports transmitted by the whistleblowers (as identified below) in order to report illicit phenomena and suspicious behavior, irregularities, acts or facts that may constitute a violation of national and European regulations, as well as of the principles and rules of conduct contained in the Code of Ethics and in the provisions contained in Model 231 adopted by Medac Srl.

3. References

Exteriors

- Legislative Decree 10 March 2023, n. 24 - Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law and laying down provisions on the protection of persons reporting breaches of national legislation.
- Legislative Decree no. 196 of 30 June 2003 – Personal Data Protection Code – and subsequent amendments and/or additions;
- EU Regulation 2016/679 of the Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data;
- Legislative Decree 231/01 "Regulation of the administrative liability of legal entities, of Medac Srl and of associations even without legal personality, pursuant to art. 11 of Law 29 September 2000, n. 300" of 08/06/2011 and subsequent updates, where applicable.

- “Guidelines on the protection of persons reporting violations of Union law and protection of persons reporting violations of national regulatory provisions – procedures for submitting and managing external reports”, issued by ANAC pursuant to art. 10 Legislative Decree 24/23 with resolution no. 311 of 12 July 2023.

Interiors

- Organizational Model 231
- Code of Ethics
- SGPV (Privacy and Video Surveillance Management System)

4 WB Management System

The SG WB is integrated with the other Management Systems operating in Medac Srl.

The company procedures, instructions and registration documents having an impact on the legislation are referred to in this PdQ .

Where the requirements set out in the WB standard are already described in other documents of the Management Systems applied in Medac Srl, the documentary references to which reference should be made for further information are reported in this PdQ . A list of the documents referred to is provided at the bottom of the index.

4.1. Objective scope: what can be reported

The report may be made when the reporting person has a reasonable and legitimate suspicion or awareness - both based on precise and consistent factual elements - of behaviors, in violation of national or European Union regulatory provisions, that harm the public interest or the integrity of Medac Srl, of which he has become aware in the "work context". This last expression must be understood in a broad sense. It is therefore considered sufficient that there is a qualified relationship between the reporting person and Medac Srl that concerns present or even past work or professional activities. Therefore, information acquired during and/or because of the performance of work duties, even if by chance, may also be reported.

Any conduct aimed at concealing violations (for example, concealing or destroying evidence of the commission of the violation) may also be reported.

Information on violations may also concern violations not yet committed that the whistleblower reasonably believes could be committed based on concrete elements. Such elements may also be irregularities and anomalies (symptomatic indicators) that the whistleblower believes could give rise to one of the violations provided for by the decree.

Reports must be made in good faith, with a spirit of responsibility, be of interest to the common good, and fall within the types of non-conformity for which the system was implemented.

- WHAT CAN BE REPORTED

The report may concern two types of violations, as summarized below [1]:

Violations of national legislation	Violations of European legislation
1. Offences relating to matters pursuant to art. 2, paragraph I, letter a), numbers 3 to 6 (public procurement, public health, protection of personal data, consumer protection, environment, competition and state aid….) 2. Where a Model 231 is adopted: Illicit conduct relevant pursuant to Legislative Decree 8 June 2001, no. 231 (predicate crimes by way of example: Undue receipt of grants, fraud against the State, a public body or the European Union for the purpose of obtaining public grants, computer fraud against the State or a public body and fraud in public supplies), or violations of the Organization and Management Model adopted pursuant to Legislative Decree 231/01 or the Code of Ethics of Medac Srl.	1. Offences falling within the scope of European Union acts relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data and security of network and information systems. 2. Acts or omissions which harm the financial interests of the Union (such as fraud, corruption and any other illegal activity related to Union expenditure). 3. Acts or omissions relating to the internal market (for example: infringements of competition and State aid). 4. Acts or conduct which frustrate the object or purpose of the provisions of the Union acts (e.g. acts which undermine the principle of free competition)

- WHAT CANNOT BE REPORTED:

- news that is clearly unfounded, information that is already entirely in the public domain, as well as information acquired only on the basis of indiscretions or rumours of little reliability (so-called “corridor gossip” or “hearsay”).

- disputes, claims or requests related to a personal interest of the reporting person or the person who has filed a complaint with the judicial or accounting authority that relate exclusively to their individual employment or public employment relationships, or inherent to their employment or public employment relationships with hierarchically superior figures. Therefore, excluded are, for example, reports regarding labor disputes and pre-litigation phases, discrimination between colleagues, interpersonal conflicts between the reporting person and another worker or with hierarchical superiors, reports relating to data processing carried out in the context of the individual employment relationship in the absence of damage to the public interest or the integrity of the public administration or private entity;

[11] Given the breadth of the cases and the complex referral technique provided by the legislator, the Official Journal link is provided for the consultation of the full text of art. 1 of Legislative Decree 24/23 and the related Annex .

- violations already mandatorily regulated by the European Union or national acts indicated in Part II of the Annex to the Decree or by the national acts that implement the European Union acts indicated in Part II of the Annex to Directive (EU) 2019/1937, even if not indicated in Part II of the Annex to the Decree (for example, reports regulated by Legislative Decree no. 385 of 1 September 1993, “Consolidated law on banking and credit” and by Legislative Decree no. 58 of 24 February 1998, “Consolidated law on financial intermediation” are excluded);
- breaches of national security, as well as procurement relating to defence or national security aspects, unless such aspects are covered by the relevant secondary legislation of the European Union.

4. 2 . Content of the report

Reports must be as detailed as possible, including all elements useful to the management body to carry out the checks and investigations necessary to evaluate their validity. To this end, the reporting entities must provide at least the following elements:

- the circumstances of time and place in which the reported event occurred;
- the description of the fact with an indication of the known circumstances (of manner, time and place);
- the personal details or other elements that allow the identification of the person to whom the reported facts are to be attributed (the so-called reported person).
- unless the report is anonymous, the personal details of the person making the report, indicating the position or function held within the company;
- the absence of any private interests connected to the report and one's good faith;
- any information or evidence (attaching the relevant documents) that may provide useful confirmation of the existence of what has been reported, in particular also the indication of any other subjects who may report on the facts being reported;
- where the report is not anonymous, the identifying data of the reporting person (name, surname, qualification, etc.). As will be better explained, the latter are supported by specific technical and organizational security measures aimed at guaranteeing absolute confidentiality of the reporting person's identity.

Where the report is not adequately detailed, the Management Body may request additional information from the whistleblower via the Whistleblowing Portal or even in person, where the whistleblower has requested a direct meeting.

It is specified that anonymous reports are permitted if sufficiently detailed and are treated in the same way as “nominative” reports. In this case, the protection measures for retaliation will be applicable only if the reporting person is subsequently identified.

Reports must not contain excessive personal data, but only the data necessary to demonstrate the validity of the complaint. As a rule, therefore, no special data should be included [2], nor personal data suitable for revealing the state of health or judicial matters. If the reports contain the aforementioned categories of personal data, referring to the reporting person or third parties, and the same are not necessary for the pursuit of the aforementioned purposes, Medac Srl will destroy them or, if this is not possible, obscure them, except in cases authorized by law or by a provision of the Authority for the protection of personal data.

If the report does not fall within this procedure, according to the definition of the objective scope just described, the Body will forward it to the competent company area/body and/or to the competent Authorities, as specified below (see paragraph 6). Such reports are, in any case, considered “protected”. This means that the body in charge does not reveal the identity or personal data of anyone who has transmitted such a report without having previously obtained their explicit consent – unless its disclosure is required by law, investigations or subsequent legal proceedings.

In all the above-mentioned cases of communication, the Data Controller guarantees that appropriate measures will always be adopted to avoid unnecessary circulation of information, in order to guarantee appropriate confidentiality in view of the particular purposes of the processing in question.

4. 3 . Subjective scope : Who can report

The following are authorised to report:

- subordinate workers;
- self-employed workers;
- collaborators, freelancers and consultants;
- interns and trainees, paid and unpaid;
- shareholders and persons with administrative, management, control, supervisory or representative functions, even when such functions are exercised on a mere de facto basis.

The report can be made:

- when the legal relationship is ongoing;
- during the probationary period, if the information was acquired during the selection process or in other pre-contractual phases;
- when the legal relationship has not yet begun, if information on the violations was acquired during the selection process or in other pre-contractual stages;
- after the termination of the legal relationship, if the information on the violations was acquired before the termination of the legal relationship itself (pensioners).

[2] information capable of revealing racial or ethnic origin, sexual orientation, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organisations of a religious, philosophical, political or trade union nature.

4. 4 . Recipient of the Reports

The management body is identified in a dedicated office composed of the following functions:

- SG (internal resource)
- RSPP (external consultant)

The Management Body, as Recipient of the Report:

- is autonomous and independent;
- ensures a fair and impartial assessment of the report received;
- respects confidentiality obligations, especially regarding the identity of the whistleblower, the person reported and other subjects involved (facilitator, family members, work colleagues, witnesses, etc.) ;
- manages the report (evaluates admissibility and carries out the investigation into the reported facts or conduct);
- manages discussions with the whistleblower (notices of receipt and closure of the report and exchanges of information);
- communicates the outcome to the reporting party (giving an account of the measures planned or adopted or to be adopted to follow up on the report and the reasons for the choice made).
- ensures adequate publicity for this procedure and on the other channels (external channel, public disclosure, reporting) provided for by Legislative Decree 24/2023 with particular regard to the conditions for accessing it to the competent subjects and the procedures.

If the report is submitted to a person other than the one identified and authorised by the administration or body, the latter will proceed to transmit it, within seven days of its receipt, to the competent person, giving simultaneous notice of the transmission to the reporting person.

5. Reporting Channels and Support

A Reporting Subject, if he/she has reasonable suspicion that one of the violations previously indicated in paragraph 3 has occurred or may occur, has the possibility of making a Report, written or oral, using the internal channels listed below:

- Through the Whistleblowing Portal, as specified below.

- Through a direct meeting with the management body, in such a way (e.g. choice of meeting locations and times) as to guarantee the confidentiality of the whistleblower in accordance with the relevant legislation.

The whistleblower may decide to turn to a person in whom he or she places his or her trust who, acting as a "Facilitator" pursuant to the legislation in question, receives similar protection as the whistleblower (see paragraph 9 below).

5.1 . The Whistleblowing portal

The Whistleblowing Portal can be reached at the following dedicated web address:

https://digitalroom.bdo.it/ Medac Srl

The platform allows anyone (employees and collaborators, suppliers and any other subject as defined in paragraph 5) - through a guided online path - to make reports, guaranteeing the confidentiality of the identity of the reporter or, where chosen, total anonymity. In fact, the system allows you to send reports without having to register or declare your personal details. If the Reporter chooses to indicate his/her personal details, confidentiality is guaranteed.

The platform allows for confidential dialogue with the reporter, without the possibility for the recipient or other subjects to trace the origin of the report.

Access to the Whistleblowing Portal is, in fact, subject to the “no-log” policy in order to prevent the identification of the whistleblower who intends to remain anonymous: this means that the company's IT systems are not able to identify the access point to the portal (IP address) even if access is made from a computer connected to the company network.

Reports transmitted through the Whistleblowing Portal are received exclusively by members of the Management Body. The association of the identity of the whistleblower to the report can, in fact, be carried out exclusively by the person in charge of managing the reports.

The processing of data contained in the reports will take place with organizational and processing logics capable of guaranteeing the security, integrity and confidentiality of the data themselves in compliance with the organizational, physical and logical measures provided for by the provisions in force.

In particular, the transmission of data provided by the reporter using the platform is managed with HTTPS protocol. Encryption techniques are also applied, thus ensuring the confidentiality of the information transmitted.

After accessing the Portal, the reporter can choose whether to use the voicemail or proceed to fill out a questionnaire consisting of open questions that will allow him to provide the elements characterising the report (facts, temporal context, etc.).

The Portal will ask the reporter whether or not he/she intends to reveal his/her identity. In any case, the reporter may provide his/her personal details at a later time, even through the messaging system provided by the Portal.

When the report is sent, the Portal will issue the reporter a unique identification code (ticket). This number, known only to the reporter, cannot be recovered in any way if it is lost. The ticket will be used by the reporter to access, always through the Portal, his/her report in order to: monitor its progress; enter additional elements to substantiate the report; provide his/her personal details; answer any questions for further information.

5.2 . The direct encounter

In the event that the whistleblower prefers to meet the Management Body in person, he/she can ask the latter, via the following contact details organogestoriomedac@gmail.com, to arrange a meeting that can take place in physical presence or even via remote communication systems, while still guaranteeing the confidentiality criteria imposed by law.

In such a case the Management Body shall set the meeting at a reasonable time.

At the time of the meeting, the management body - after issuing the information on the processing of personal data and/or the information necessary to find the complete text of such information - in order to guarantee the traceability of the oral report and the same level of protection ensured to written reports, proceeds to register the report on the IT management platform, recording on it all the progress of the investigation activity.

6. Report Management

6.1. Management procedure

The reports received by the Management Body are subject to the following investigation procedure.

Reports whose generality does not even allow for the initiation of an investigation by directing it towards concrete prospects will not be taken into consideration and will be immediately archived.

The reports and the related supporting documents will be subject to preliminary analysis by the Management Body, in order to verify the presence of useful and sufficient data and information to evaluate the abstract validity of the report, to start further investigations.

Once this analysis has been carried out, if the Management Body verifies that the reported fact has no impact for the purposes of Legislative Decree 24/23, but, nevertheless, may be relevant for the Company for other different purposes, it will proceed to forward it promptly to the competent body/organism, giving notice of this to the reporting party.

In the event, however, that the competent Body deems that there is a reasonable basis for validity/reliability, an in-depth investigation will be carried out on the facts that are the subject of the report, in order to ascertain their validity. In carrying out the aforementioned analysis, the Management Body may avail itself - for specific aspects covered in the reports and if deemed necessary - of the support of other company functions within their jurisdiction and may request further information and/or documentation from the reporting party via the Portal itself or even in person , always taking care to preserve the confidentiality of the identity of the reporting party.

If, at the end of the preliminary analysis phase, it emerges that there are no sufficiently detailed elements or that the facts referred to are unfounded, the report will be archived with the relative reasons. In this case, the competent Body will inform the reporting party of the conclusion and results of the investigation carried out.

Where, following the preliminary analyses, useful and sufficient elements emerge or can be deduced to assess the validity of the report, the subsequent phase of specific investigations will be initiated.

The Management Body will:

- initiate specific analyses using, if deemed appropriate, the competent structures of Medac Srl;

- at the conclusion of the in-depth analysis carried out, submit the results to the assessment of the internal competent bodies or external bodies/institutions, each according to their own competences, depending on the subject of the report, so that the most appropriate measures are undertaken. It is not the responsibility of the person in charge of managing the report to ascertain individual responsibilities of any nature, nor to carry out checks of legitimacy or merit on acts and measures adopted by the body/administration subject to the report.

- conclude the investigation at any time if, during the investigation itself, the report is found to be unfounded.

The activities described above are not necessarily carried out sequentially.

In any case, at the end of the investigation phase, the competent Body will inform the reporting person of the outcome of the report, giving an account of the measures planned or adopted or to be adopted to follow up on the report and the reasons for the choice made, to the extent that such information does not prejudice the internal inquiry or investigation or infringe the rights of the person involved (e.g. communication of archiving, referral to the competent authority for further investigations, initiation of an internal investigation, etc.).

It is specified that, in order to privilege the will of the reporting person, it is always possible for the latter to withdraw the report by means of a specific communication to be transmitted through the channel originally chosen for forwarding the same. In this case, any investigations already started will be stopped.

6.2. Timings

In the context of the management of the internal reporting channel, the Management Body:

- issues the reporter an acknowledgement of receipt within 7 days of the date of receipt of the report:

- provides timely feedback to any requests forwarded by the whistleblower through the reporting channels (messaging system implemented on the platform)

- provides feedback to the report within three months from the date of acknowledgement of receipt or, in the absence of such acknowledgement, from the expiry of the seven-day period from the submission of the report.

7. The protection system

The protection system provided by Legislative Decree no. 24/2023 is divided into the following types of protection:

1. the protection of the confidentiality of the whistleblower, the facilitator, the person involved and the persons mentioned in the report;
2. protection from any retaliatory measures adopted by the entity as a result of the reporting, public disclosure or denunciation made and the conditions for its application [3];

[3] The legislation provides for a very broad definition of retaliation which includes:

3. limitations of liability with respect to the disclosure and dissemination of certain categories of information which apply under certain conditions [4];
4. the provision of support measures by third sector bodies included in a specific list published by ANAC [5].

These measures are extended, in addition to the whistleblower, to the following subjects:

- to the facilitator (a natural person who assists the whistleblower in the reporting process, operating within the same work context and whose assistance must remain confidential). For example, the facilitator could be a colleague from an Office other than the one to which the whistleblower belongs who assists the latter in the reporting process on a confidential basis, i.e. without disclosing the information learned. The facilitator could be a colleague who also holds the qualification of trade unionist if he assists the whistleblower in his name and on his behalf, without using the trade union acronym;

- to persons in the same work context as the reporting person, the person who filed a complaint or the person who made a public disclosure and who are linked to them by a stable emotional or kinship bond within the fourth degree;

- to work colleagues of the reporting person or of the person who made a complaint or made a public disclosure, who work in the same work context as the reporting person and who have a habitual and ongoing relationship with that person.

- to entities owned by the reporting person or for which the same persons work as well as to entities operating in the same work context as the aforementioned persons.

Waivers and transactions, whether complete or partial, which have as their object the rights and protections provided for by the decree are not valid, unless they are carried out in the protected locations referred to in art. 2113, paragraph 4, of the civil code .

" *any behavior, act from omission, also Alone attempted or threatened, place in to be in reason from the report, from the complaint to the authority judicial or accountant or from the disclosure public And That provokes or can provoke at the person reporting or at the person That has sport there complaint, in away live or indirect, a harm unjust* ». In order for retaliation to be configured and, consequently, for the subject to benefit from protection, a close connection must exist between the reporting, disclosure and denunciation and the unfavourable behaviour/act/omission suffered, directly or indirectly, by the reporting person, reported or who makes the public disclosure. The protection provided in the event of retaliation is not guaranteed when the criminal liability of the reporting person for the crimes of defamation or slander or in any case for the same crimes committed with the report to the judicial or accounting authority or his civil liability, for the same reason, in cases of fraud or gross negligence is ascertained, even by a first-instance judgment. The management of retaliatory communications is the responsibility of ANAC, which is entrusted with the task of ascertaining whether they are a consequence of the reporting, denunciation or public disclosure made.

[4] These are limitations that operate when certain conditions occur, in the absence of which there would be consequences in terms of criminal, civil and administrative liability.
The exemption provided for, however, only applies in cases where two conditions occur SIMULTANEOUSLY:
1. The first requires that at the time of disclosure or dissemination there are reasonable grounds to believe that the information is necessary to reveal the violation. The person, therefore, must reasonably believe, and not on the basis of simple inferences, that the information must be revealed because it is indispensable to reveal the violation, excluding superfluous information, and not for further and different reasons (for example, gossip, vindictive, opportunistic or scandalistic purposes);
2. The second condition, however, requires that the reporting, public disclosure or denunciation has been carried out in compliance with the conditions set out in Legislative Decree no. 24/2023 in order to benefit from the protections (reasonable grounds to believe that the information on the violations was true and fell within the reportable violations pursuant to Legislative Decree no. 24/2023; internal and external reports, public disclosures carried out in compliance with the methods and conditions set out in Chapter II of the decree.

[5] To further strengthen the protection of the whistleblower, the legislator provides for the possibility for ANAC to enter into agreements with Third Sector entities so that the latter provide support measures to the whistleblower (free assistance and consultancy). These entities will be included in a special list published by ANAC on its institutional website.

7.1. Privacy Policy

Medac Srl guarantees the confidentiality of the identity of the Reporter [6]starting from the stage of receiving the report, in compliance with the provisions of the law. To this end, the personal identification data of the Reporter are stored in such a way as to be visible exclusively to the body responsible for managing the report. Medac Srl adopts all the guarantees and technical and organizational measures required by law in order to protect the confidentiality of the identity of the Reporter, so that it is not revealed to third parties without the express consent of the latter, except in the case of reports in bad faith or defamatory. These measures include the obscuring of personal data, especially those relating to the Reporter but also of other subjects whose identity, pursuant to Legislative Decree 24/2023, must remain confidential (the facilitator, the reported person, the other persons mentioned in the report), if, for investigative reasons, other subjects must also be made aware of the content of the report and/or the documentation attached to it.

No retaliation or discrimination, direct or indirect, may be suffered by anyone who has made a report in good faith, regardless of whether the report is later found to be well-founded or not.

Sanctions are foreseen for those who violate the measures of protection and confidentiality of the whistleblower.

The protection of the whistleblower is not guaranteed, however, in the case of reports made with malice or gross negligence or which prove to be false, unfounded, with defamatory content or in any case made with the sole purpose of damaging Medac Srl, the reported person or other parties involved in the report. Sanctions are provided for the whistleblower, if it is possible to trace him/her in the case of reports made with malice or gross negligence or which prove to be false, unfounded, with defamatory content or in any case made with the sole purpose of damaging Medac Srl, the reported person or other parties involved in the report.

Medac Srl may also undertake appropriate legal initiatives.

In the event of disciplinary proceedings, the identity of the whistleblower may not be revealed where the contestation of the disciplinary charge is based on investigations that are separate and additional to the report, even if consequent to the same; the identity of the whistleblower may be revealed only where:

- the challenge is based, in whole or in part, on the report itself and knowledge of the identity of the whistleblower is absolutely indispensable for the defence of the accused; and
- there is the consent of the whistleblower.

In such case, Medac Srl will take care to communicate, always in advance, in written form to the reporting person the reasons that lead to the disclosure of his/her identity.

[6] The protection afforded by the provision, in accordance with the principles of data protection legislation, includes the identity of the reporting person and any other information from which it can be deduced, directly or indirectly; such identity cannot be revealed without the express consent of the reporting person to persons other than those competent to receive or follow up on the reports.

8. Protection of the Reported Person

Medac Srl guarantees adequate protection to the persons directly or indirectly subject of the report.

The report is not sufficient to initiate any disciplinary proceedings against the reported person.

Therefore, it will not be possible to impose disciplinary sanctions on the reported individual on the basis of what the whistleblower has stated, without there being objective evidence and without having proceeded to investigate the facts reported.

This could possibly occur on the basis of other evidence found and verified starting from the report itself.

In the context of any proceedings initiated against him/her following the conclusion of the verification and analysis activity of the report and in the event that such proceedings are based in whole or in part on the report, the reported person may be contacted and will be assured the possibility of providing any necessary clarification.

9. Personal Data Protection and Documentation Retention

The personal data of the reporting person and of other subjects deserving of protection (e.g. facilitator, persons mentioned, reported, etc.) and the information contained in the reports and in any documents attached to them, as well as any data acquired during the investigation by the designated body, are processed in accordance with the Personal Data Protection Policy adopted by Medac Srl, in compliance with the principles of correctness, lawfulness, transparency and protection of the confidentiality and rights of all interested parties (reporter, reported and any third parties involved), and in compliance with the obligations imposed by the data protection legislation in force.

Medac Srl, as Data Controller, has carried out a preventive Impact Assessment of its reporting management system which can be consulted upon request to be forwarded to the Management Body.

Medac Srl has therefore adopted suitable technical and organizational measures for the protection of data which are periodically verified. In particular:

- Medac Srl has adopted a reporting management platform that guarantees suitable technical protection measures, such as encryption, access segregation, prohibition of tracking of the reporting party, tracking of the operations of the management body;
- Medac Srl has adopted organizational measures such as: authorization, instruction and training of personnel authorized to access the personal data in question; formalization of agreements with suppliers who operate as data controllers (e.g. SaS provider of the platform for managing reports); provision of information on processing pursuant to art. 13 GDPR to interested parties; updating of the Processing Register.

The Management Body takes care of archiving all documentation supporting the report received. The personal data relating to the reports are stored and maintained for the period

necessary to complete the verification of the facts set out in the report and for the subsequent 5 years starting from the date of communication of the final outcome of the reporting procedure, except for any proceedings arising from the management of the report (disciplinary, criminal, accounting) against the reported person or the reporting person (bad faith, false or defamatory statements). In this case, they will be stored for the entire duration of the procedure and until the expiry of the terms for appealing the relevant provision. At the end of said period, the data are deleted or irreversibly anonymized and stored for statistical purposes only .

10. Sanctions

Violations of the principles set out in this procedure will be prosecuted promptly and immediately.

Medac Srl reserves the right to take disciplinary action against the whistleblower in the event of abuse of the " Wistleblowing " tool, for example in the case of manifestly opportunistic reports and/or for the sole purpose of damaging the reported party or any person affected by the report and any other hypothesis of improper use or intentional exploitation of the institution which is the object of this procedure.

Sanctions will be applied on the basis of the Workers' Statute (Law No. 300/1970) and of the individual National Collective Agreements and of the disciplinary system pursuant to MOG 231, without prejudice to the possibility of asserting further rights and interests in the appropriate legal venues.

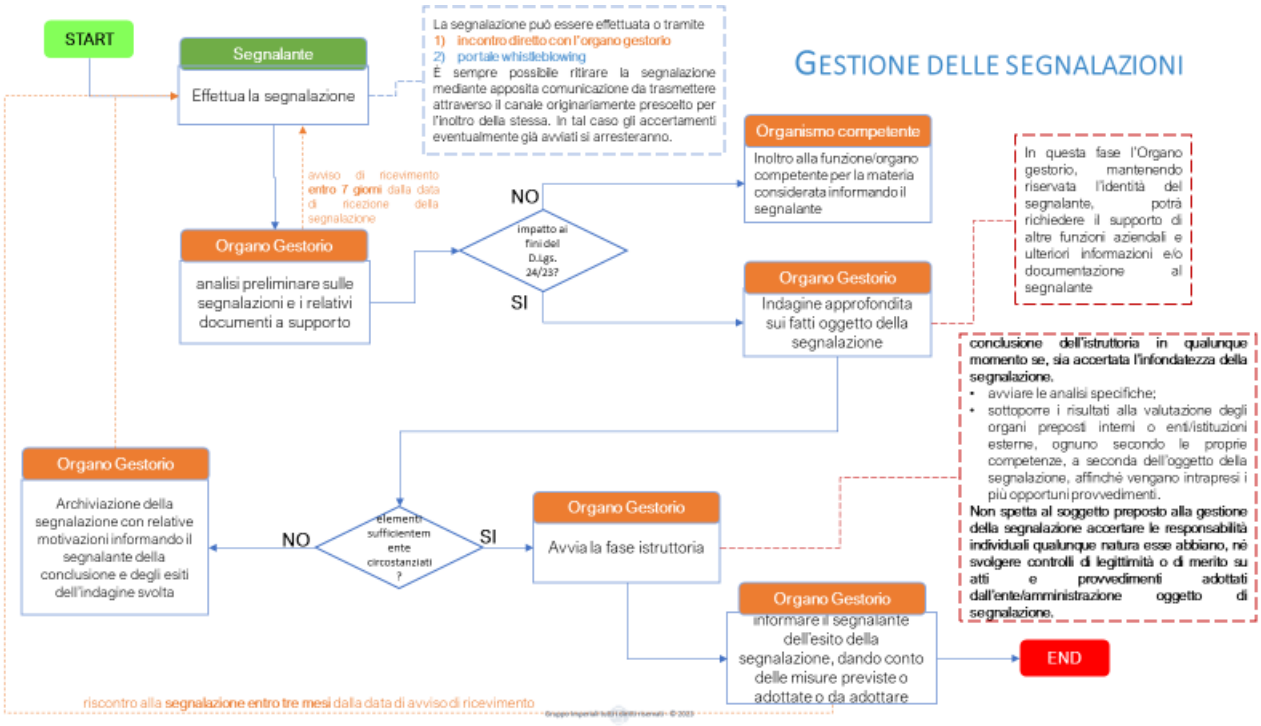
11. Policy Update

This Procedure and the Portal will be subject to periodic review to ensure constant alignment with the reference legislation as well as in light of the operations and experience gained.

12. Awareness and Advertising

Medac Srl, through the Management Body, undertakes communication and awareness initiatives of this procedure and the other reporting channels provided for by Legislative Decree 24/23 (external channel, public disclosure, complaint) through training initiatives also disclosed on the intranet portal and on the institutional website aimed at all potential whistleblowers for the purpose of communicating the purposes of the Whistleblowing institution and the methods for its correct use; on the related rights and obligations; on the consequences of abuse in its use; on the results that the implementation of the rule has produced.

13. Workflow


START
Segnalante
Effettua la segnalazione
La segnalazione può essere effettuata o tramite
1) incontro diretto con l'organo gestorio
2) portale whistleblowing
È sempre possibile ritirare la segnalazione mediante apposita comunicazione da trasmettere attraverso il canale originariamente prescelto per l'inoltro della stessa. In tal caso gli accertamenti eventualmente già avviati si arresteranno.
GESTIONE DELLE SEGNALAZIONI
avviso di ricevimento entro 7 giorni dalla data di ricezione della segnalazione
Organo Gestorio
analisi preliminare sulle segnalazioni e i relativi documenti a supporto
NO
Impatto ai fini del D.Lgs. 24/23?
SI
Organismo competente
Inoltro alla funzione/organo competente per la materia considerata informando il segnalante
Organo Gestorio
Indagine approfondita sui fatti oggetto della segnalazione
In questa fase l'Organo gestorio, mantenendo riservata l'identità del segnalante, potrà richiedere il supporto di altre funzioni aziendali e ulteriori informazioni e/o documentazione al segnalante
conclusione dell'istruttoria in qualunque momento se, sia accertata l'infondatezza della segnalazione.
• avviare le analisi specifiche;
• sottoporre i risultati alla valutazione degli organi preposti interni o enti/istituzioni esterne, ognuno secondo le proprie competenze, a seconda dell'oggetto della segnalazione, affinché vengano intrapresi i più opportuni provvedimenti.
Non spetta al soggetto preposto alla gestione della segnalazione accertare le responsabilità individuali qualunque natura esse abbiano, né svolgere controlli di legittimità o di merito su atti e provvedimenti adottati dall'ente/amministrazione oggetto di segnalazione.
Organo Gestorio
Archiviazione della segnalazione con relative motivazioni informando il segnalante della conclusione e degli esiti dell'indagine svolta
NO
elementi sufficientemente circostanziati?
SI
Organo Gestorio
Avvia la fase istruttoria
Organo Gestorio
informare il segnalante dell'esito della segnalazione, dando conto delle misure previste o adottate o da adottare
END
riscontro alla segnalazione entro tre mesi dalla data di avviso di ricevimento