

# HOW TO SUBMIT A WHISTLEBLOWING REPORT?

## YOU CAN REPORT

Any communication received from FIS concerning conduct referable to FIS personnel that constitutes or could constitute a violation of the Code of Ethics, laws, regulations, provisions of the Authorities, internal regulations, Model 231, or compliance models. The communications on circumstances other than those described above, will not be treated.



#### Who can make a Whistleblowing Report?

The subjects who can make a Whistleblowing Report are the following:

- The Directors and Corporate Body members (Shareholders' Meeting, Board of Directors, Board of Statutory Auditors, etc.).
- FIS employees and collaborators in any capacity.
- External Third Parties (for example, consultants with any type of contract or assignment, subjects acting on behalf of the organization such as intermediaries and agents, suppliers of products or services, distributors, business partners, Stakeholders and their employees and associates).

#### How can you make a Whistleblowing Report?

The Whistleblowing Report shall be sufficiently detailed (clear and complete description of the fact, circumstances of time and place, generalities or other elements that would allow the identification of the person to whom the facts would be attributable, any other information that would provide objective supporting evidence) so as to enable the facts reported to be ascertained. The Whistleblowing Report shall be sent through the appropriate channels, indicated below, privileging, where possible, the web which is considered suitable to guarantee the confidentiality of the identity of the whistleblower through IT tools.

#### **External reporting**

The National Anticorruption Authority ("ANAC") provides a channel for making external reports outside the scope of this Policy and with respect to violations of Union law or certain national regulatory provisions.

#### **Guarantee of confidentiality and anonymity**

FIS guarantees the utmost confidentiality on the persons and facts reported, as well as on the data identifying the whistleblower.

#### You can make an anonymous report

FIS will asses all Whistleblowing Report signed by the whistleblower, treating them in a strictly confidential manner. Anonymous Reports will also be processed, but with the limitations related to the difficulty or impossibility of contacting the anonymous reporter, where necessary necessary, the reporter to ask for his cooperation and to obtain further information useful for the verification of the reported facts.

#### What will FIS do once the Whistleblowing Report is received?

A FIS internal and dedicated team (Whistleblowing Committee with the requirements of competence, independence, and absence of conflict of interest) shall asses preliminarily the communications received in order to identify among these the Whistleblowing Reports to be investigated, in order to verify the information reported therein and to take the most appropriate measures (adoption of prevention, mitigation, sanctioning measures, etc.).

#### Prohibition of retaliatory or discriminatory acts

The whistleblower may not be fired, nor may he/she be subjected to any change of job or be suspended, transferred or subjected to any other organizational measure that has a direct or indirect negative effect on working conditions, or threatened, harassed or discriminated against in any way, for having made a Whistleblowing Report in good faith.

#### **Illicit Reports**

In case of unfounded reports made in bad faith or with gross negligence (so called "Illicit Reports"), FIS reserves the right to act in defence of its interests and to protect the injured parties. In order to protect the image and reputation of people who were unjustly reported, FIS will guarantee the application of the disciplinary sanctions, also toward the whistleblower.

#### Processing of personal data ("Data")

Data will be processed in compliance with applicable personal data protection regulations. Information on FIS's purposes and methods of data processing is available at: www.fisvi.com

For further informations

FIS 1002 whistleblowing Policy

#### **Whistleblowing Reporting channels**



Dedicated IT platform

https://www.fisvi.com

It's suitable to guarantee the confidentiality of the identity of the whistleblower through IT tools





### Direct meeting with the Whistleblower

Report made via declaration issued by the Reporter in a specific hearing request through the other channels indicated here, within a deadline reasonable.



Ordinary mail

Internal Audit's ordinary mail address: c/o F.I.S. - Fabbrica Italiana Sintetici S.p.A. Viale Milano n. 26, 36075; Montecchio Maggiore (VI), indicating on the outside of the envelope: "CONFIDENTIAL TO INTERNAL AUDIT"