

# PR\_LE\_01 Procedure on the reporting of Whistleblowing violations

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0	08/08/2024	Initial Draft	D.Zanzot (LE)	F.Bertolin (GQ)	M.Pizzato (DGEN)

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# 1. Introduction

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Whistleblowing is an institution under Anglo-Saxon law having as its object the Reporting by an individual, known as a 'Whistleblower', of Violations, illegal or fraudulent activities committed within a public or private entity, which he/she has witnessed in the performance of his/her work duties.

The European Union has tried to give uniformity of application to this institution with the adoption of Directive 2019/1937 concerning the protection of persons who report breaches of European Union Law and of the national law deriving from it or otherwise identified by the national transposing legislation.

In Italy this Directive was transposed by Legislative Decree No. 24 of 10 March 2023, which requires specific categories of public and private entities, including Pizzato Elettrica s.r.l., to adopt an appropriate system for the reporting and management of violations of the regulatory provisions identified in Annex 1 of the aforementioned decree.

## 2. Purpose

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The purpose of this document is to inform the Whistleblower and all persons potentially involved on the provisions of Legislative Decree 24/2023, and to regulate the process of receiving and managing Reports.

This procedure concerns the management of Reports of Violations, as well as illustrates the rights and duties of the persons involved in the Report and any alternative channels through which the Report may be submitted.

To this end, the Company makes the Procedure available to all its Addressees in the following ways:

- Publication on the Company notice boards;
- Publication on each employee's notice board on FPnet;
- Publication on the Company's website at the following address: [www.pizzato.com](http://www.pizzato.com);

It should be noted that this Procedure does not in any way replace the provisions of Legislative Decree 24/2023, the Addressees being subject to the right and duty to read, understand and comply with such legislation.

## 3. Definition

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For the purposes of this procedure, and without prejudice to the definitions set out in Article 2 of Legislative Decree n. 24/2023, the following terms shall have the following meaning:

**Company:** Pizzato Elettrica s.r.l. (P. IVA 01704080249), having its registered office in via Torino 1, 36063 Marostica (VI).

**Addressees:** the subjects identified in Article 4 of this procedure.

**Violation(s):** conduct, acts or omissions that harm the public interest or the integrity of the public administration or private entity in accordance with the provisions of Article 2, paragraph 1, letter. a) of Legislative Decree 24/2023.

**Report:** written or oral communication of information, including well-founded suspicions, concerning Violations committed or which, based on concrete elements, the Whistleblower believes might be committed, in accordance with the provisions of Legislative Decree no. 24 of 10 March 2023.

The Report can in turn be distinguished, as will be further explained, into:

- **Internal Report:** the recipient of the Report is a body of the Company, whether internal or external;
- **External Report:** the recipient of the Report is the National Anti-Corruption Authority – ANAC
- **Public Report:** disclosure through the press or other means, including electronic means, capable of bringing the Violation into the public domain.

In any case, this is without prejudice to the Whistleblower's right to bring the matter before the competent Judicial Authority.

Depending on the case, the Report may also be qualified as:

- **Anonymous Report:** any Report in which the identity of the Whistleblower is not explicit;



- **Report in bad faith:** Report made with the sole purpose of damaging or, in any case, cause harm to the Reported.

**Whistleblower:** the person or the legal entity, as better identified in Article 4, who makes the Report on Violations of which he/she/it becomes aware of in the context of his/her/its work, i.e. in the performance of his/her/its duties or in the execution of the contract in force with the Company.

**Facilitator:** the person or the legal entity assisting the Whistleblower in the Reporting process and operating within the same work context.

**Reported:** the person or the legal entity to whom the Violation is attributed by the Whistleblower.

**Whistleblowing Officer(s):** person(s) appointed by the Company's Board of Directors who is/are responsible for managing the Reports in all their phases, from the moment of receipt to the moment of suggestion of a corrective measure.

## 4. Applicability

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Pursuant to Article 3, paragraph 3 and 4 of Legislative Decree 24/2023, the following persons may be Whistleblowers:

- Employees of the Company;
- Self-employed workers or external collaborators;
- Suppliers and their employees or collaborators;
- Freelancers and consultants;
- Volunteers and trainees, paid and unpaid;
- Shareholders and persons with administrative, management, supervisory or representative functions;
- Candidates for a job position, where Violations were acquired by them during the selection process;
- Probationary employees;
- Former employees, where the Violations were acquired by them during the employment relationship.

Pursuant to Article 3, paragraph 5 of Legislative Decree 24/2023, the following persons are also Addressees of this procedure, by virtue of the protections granted to them by Legislative Decree 24/2023:

- The Facilitator;
- Persons in the same work environment as the Whistleblower and who have a stable emotional relationship with him or her, or are related to him or her up to the fourth degree of kinship (by way of example but not limited to: spouses, parent and child, cousins);
- Colleagues of the Whistleblower who work in the same work environment and who have a usual and current relationship with that person (e.g. because they are assigned to the same office);
- Entities owned by the Whistleblower.

Finally, this procedure applies to Whistleblowing Officers.

## 5. Violations to be reported

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The Report relates to Violations of national or European Union law provisions detrimental to the public interest or to the integrity of the public administration or private entity of which the Whistleblower has become aware in its working environment, as identified in Article 2, paragraph 1, letter a), numbers 3), 4), 5) and 6) of Legislative Decree 24/2023, namely:

- Administrative, criminal, civil and accounting offences;
- Unlawful conduct relevant under Legislative Decree 231/2001;
- Offences falling within the scope of application of EU or national acts relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and financing of terrorism; 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; privacy and protection of personal data and security of networks and information systems;

- Acts or omissions affecting the EU's financial interests protected within the meaning and for the purposes of Article 325 TFEU;
- Acts or omissions affecting the internal market as referred to in Article 26 paragraph 2 TFEU, including violations of EU competition and state aid rules as well as corporate taxes;
- Acts or conducts that frustrate the object or purpose of the provisions of Union acts in the areas mentioned in the preceding points.

The Report may be taken into consideration by the Whistleblowing Officer only if based on well-founded grounds or concrete elements and if adequately substantiated, i.e. if the circumstances of time and place in which the reported fact occurred are clearly indicated, as well as if the Reported is adequately identified or easily identifiable on the basis of the description of the Whistleblower.

It should be noted that complaints, claims or requests linked to a personal interest of the Whistleblower that relates exclusively to his/her individual work relations, or to relations with hierarchical superiors (Article 1, paragraph 2, letter a), may NOT be reported, since they do not fall within the scope of protection of Legislative Decree n. 24/2023.

Neither can facts that are clearly unfounded, information that are already fully in the public domain or information acquired only based on indiscretions, unreliable rumours or 'rumour mills' be the subject of Reports.

Lastly, it should be noted that Reports in bad faith are prohibited and may, depending on the case, lead to the imposition of a disciplinary sanction or, where appropriate, to a report to the competent Authorities.

## 6. Functioning of the Internal Report

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### 6.1. Communication channels

Reports concerning Violation committed by the Reported should be addressed to the Whistleblowing Officer(s) in the following ways:

- By registered or ordinary mail to the address of the Company. The envelope containing the Report shall be composed as follows:
  - the Whistleblower shall insert his/her identification data in a first sealed envelope;
  - the description of the Violation shall be placed in a second sealed envelope;
  - both envelopes shall be placed in a third sealed envelope with the following wording on the outside: *'Confidential - to the attention of the Whistleblowing Officer(s)'*;
  - the envelope thus obtained shall be sent to the Company;
- Orally, by leaving a telephone message via WhatsApp at the following telephone number +39 389 8227599, which is exclusively managed by the Whistleblowing Officers.

The same channels indicated above may be used by the Whistleblower in order to request an appointment with the Whistleblowing Officers if he/she prefers to make a Report in person.

In this case, the Whistleblowing Officers will take all the necessary steps to arrange a meeting with the Whistleblower within two working weeks, taking all the appropriate measures to ensure the confidentiality of the Whistleblower.

Both in the case of a Report made orally and in the case of a Report made in person, the Whistleblowing Officer shall draw up a written record of the information gathered from the Whistleblower, and ensure that the latter signs it, immediately in the case of a Report made in person, at a time and in a manner best suited to ensure the confidentiality of the Whistleblower (not anonymous) in the case of an oral Report (i.e. via WhatsApp).

Where the Report is received by a person other than the Whistleblowing Officer, he/she shall immediately, and in any case no later than two working days, forward the same to the Whistleblowing Officer, and ensure to eliminate any element or data linked to such receipt, in order to protect the confidentiality of the Whistleblower.

In the event that the Whistleblower intends to make a Report relating to the Whistleblowing Officers or in respect of which the Whistleblowing Officers might find themselves in a situation of conflict of interest (e.g.



because it concerns a person subordinate to them), he/she shall send a registered or ordinary letter to the Chairman of the Board of Directors of the Company in the same manner described above, with the sole care to indicate on the envelope that it is '*Confidential - to the attention of the Chairman of the Board of Directors*'. The possibility of making an External Report as specified in Article 7 below shall always remain valid.

## 6.2. Contents of the Report

All Reports received through the above-mentioned communication channels must be detailed and contain sufficient information to allow an adequate assessment on whether they are founded and permit to proceed with the subsequent investigation. In particular, the following must be clearly defined:

1. the identity and at least one contact address of the Whistleblower, with an indication of the position or function performed within the Company and, if external to the Company, the relationship of interest with the latter;
2. the circumstances of time and place in which the event that is the subject of the Report occurred, if known;
3. the clear and complete description of the event;
4. the personal details or other elements that allows the identification of the Reported, if known;
5. an indication of any other persons who may report on the facts that are the subject of the Report;
6. the indication or attachment of any documents that may confirm the validity of such facts.

It will always be possible to send an Anonymous Report, but in this case it will not be possible to reply to the Whistleblower, unless he/she is subsequently identified or declares him/herself as such.

## 6.3. Management of the Report

The Whistleblowing Officers are responsible for receiving Reports, assessing their relevance and grounds, carrying out the necessary preliminary investigation and verification activities, in order to express an opinion on the Report.

After receiving the Report, the Whistleblowing Officers perform the following activities:

- They send to the Whistleblower an acknowledgement of receipt of the Report within seven days (subject to Company closures) from the date of its receipt;
- Register the Report received in a register reserved for Whistleblowing Reports, indicating the date and time of receipt and the identity and qualification of the Whistleblower, then assigning a unique and anonymous identification code to the Report;
- They proceed to store the identity data of the Whistleblower in a separate file from that containing the descriptions of the Violations. The latter, in whatever form received, shall be numbered with the unique and anonymous identification code, so as to guarantee the confidentiality of the Whistleblower throughout the entire period of management and verification of the Report;
- Carry out a preliminary assessment of the conformity and relevancy of the Report, and in particular that
  - the Violation is among those covered by Legislative Decree n. 24/2023 as amended and supplemented;
  - the Violation is adequately substantiated;
  - the Violation does not concern disputes, claims or requests linked to a personal interest of the Whistleblower that relate exclusively to his/her individual working relations or inherent to relations with hierarchically superior figures;

Otherwise, the Whistleblower will be informed of the closure of the procedure.

- They initiate the preliminary investigation phase, which consists in carrying out all the investigations and checks necessary to ascertain the Violation that is the subject of the Report. In doing so, they may ask the Whistleblower and/or any of the persons or functions involved in the Report to provide additional information or clarifications, including documents, while taking due care to ensure confidentiality. The

Whistleblowing Officers may also avail themselves of the support of third parties, even those external to the Company, having specific competences for the purposes of ascertaining the facts of the Report;

- To close the Report they prepare a summary in which they describe the management process and the conclusions reached in terms of any corrective action to be taken, which is kept in the dedicated files of the Whistleblowing Officers;
- Provide feedback to the Whistleblower within three months from the date of receipt of the Report, or, in the absence of such notice, within three months from the expiry of the seven-day period (without prejudice to Company closures) from the submission of the Report, indicating whether the Report was deemed unfounded and therefore dismissed, or whether the Report was found to be well-founded. Should the investigation phase not be reasonably concluded within this deadline, the acknowledgement will consist of a mere communication of the fact that the assessment operations are still in progress and of the new deadline for the final feedback, which cannot, however, exceed a further three months.

Regarding the outcomes of the Report management, the Whistleblowing Officers may consider the latter:

1. Unfounded, in which case they shall proceed to file the Report and notify the Board of Directors thereof in order to take any disciplinary action in cases of bad faith, wilful misconduct, gross negligence or in the cases provided for by Legislative Decree 24/2023;
2. Founded, in which case they shall transmit the preliminary findings to the competent corporate bodies, ensuring in any case that the documentation transmitted does not contain explicit or implicit references to the identity of the Whistleblower. In particular:
  - where the Report concerns the unlawful conduct of an employee, a supplier and/or a consultant or the Statutory Auditor of the Company, the Board of Directors shall be informed, in order to take the appropriate disciplinary action;
  - where the Report concerns the unlawful conduct of one or more members of the Board of Directors, the Whistleblowing Officers will inform the Statutory Auditor.

In no case the Whistleblowing Officers may independently initiate disciplinary actions or refer the matter to the Judicial Authorities, as these activities are entrusted to the corporate bodies and functions appointed for this purpose.

Once the Report management process has been completed, all the information collected in relation to the same will be retained for a period not exceeding five years from the date of communication of the outcome of the procedure (except in cases provided for by law).

## 7. External Report

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In addition to the Internal Report, the Whistleblower may make an External Report addressed to the National Anti-Corruption Authority - ANAC, but the Whistleblower may send it only if specific conditions are met, and in particular:

- a) the Internal Report channel has not been activated or, even if activated, does not comply with the provisions of Article 4 of Legislative Decree 24/2023
- b) the Whistleblower has already made an Internal Report, but the same has not been followed up within the time limits set out in this procedure;
- c) the Whistleblower has well-founded reasons to believe that, if he/she made an Internal Report, it would not be effectively followed up, or that the Report might give rise to the risk of retaliation;
- d) the Whistleblower has reasonable grounds to believe that the Violation may constitute an imminent danger to the public interest.

Such External Report may be made either in writing or orally, through the channels provided for by the said Authority. On this point, you may consult the information made available by ANAC on its official channels.



## 8. Public Report

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Lastly, the Whistleblower may make a Public Report, through the press or media, including electronic media, capable of bringing the Violation into the public domain, only if specific conditions are met, and in particular:

- a) the Whistleblower has previously made an Internal Report and an External Report and has not received a reply within the time limits set out in Articles 5 and 8 of Legislative Decree n. 24/2023 on the measures envisaged or adopted to follow up the Reports;
- b) the Whistleblower has well-founded reasons to believe that the Violation may constitute an imminent or obvious danger to the public interest;
- c) the Whistleblower has well-founded reasons to believe that the External Report may entail the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those in which evidence may be concealed or destroyed, or in which there is a well-founded fear that the recipient of the Report may be in collusion with the author of the Violation or involved in the Violation itself.

## 9. Principles

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Legislative Decree 24/2023 provides that the Whistleblowing process, the verifications by the Whistleblowing Officers, the outcomes of the Report and, in general, the conduct of the Addressees of this procedure and the process described therein, shall be guided by the principles set out below.

### 9.1. Confidentiality

The identity of the Whistleblower and any other information that may directly or indirectly reveal his/her identity may not be disclosed to persons other than the Whistleblowing Officer, as well as to any other person expressly authorised to process such data, without the prior express consent of the Whistleblower, to be given on a case-by-case basis.

This translates, during the investigation phase, into the obligation of the Whistleblowing Officers to keep the identity of the Whistleblower secret to the other functions or third parties whose involvement may be required. It should be noted that the identity of the Whistleblower may be disclosed in disciplinary proceedings initiated by the Company against the Reported, only with the Whistleblower's consent and only where the Report is indispensable to guarantee the Reported right of defence in disciplinary proceedings. In such a case, the Whistleblowing Officers shall notify the Whistleblower in writing so that he/she can give his/her consent.

The same protection of confidentiality applies to the persons involved or mentioned in the Report, and in particular, but not only, to the Reported until the conclusion of the proceedings initiated on account of the Report.

As for the right to confidentiality of the Whistleblower outside the corporate sphere, i.e. during civil, criminal, administrative and accounting proceedings, the rules governing the same shall apply.

### 9.2. Privacy protection

The Whistleblowing theme is closely linked to the issue of Privacy, both of the Whistleblower and of any other persons involved in the Report.

In compliance with the special regulations, the Company processes the data contained in the Reports in accordance with the GDPR and for the sole purpose of following them up. It should be noted that the information contained in the Reports may be used solely for the purpose of following them up, to take disciplinary action against the persons involved or, in the most serious cases, to inform the Judicial Authorities. The personal data of the Whistleblower, of the Reported and of the persons involved may be processed only in the manner, for the purposes and for the period provided for in the Whistleblowing Privacy Policy, which constitutes Annex 1.



### **9.3. Protection from retaliation**

The following persons:

- Whistleblower;
- Facilitators;
- Persons in the same working context as the Whistleblower and who have a stable affective link with the Whistleblower or are in a family relationship up to the fourth degree of kinship (by way of example but not limited to: spouses, parent and child, cousins);
- Colleagues of the Whistleblower who work in the same work environment and have a regular and current relationship with that person (e.g. because they are assigned to the same office);
- Entities owned by the Whistleblower

shall not suffer any retaliation or other negative consequence as a result of the Report. By way of example and without limitation, retaliatory conduct or acts are those indicated in Article 17, paragraph 4, of Legislative Decree n. 24/2023.

In the event of retaliation, the aforementioned persons may refer the matter to the ANAC, which will carry out the appropriate investigations and assessments, also with the involvement, where necessary, of the Labour Inspectorate.

In any case, any retaliatory disciplinary acts carried out by the Company shall be considered null and void.

A list of Third Sector entities has been set up at the ANAC to provide support measures to the Whistleblower, including, by way of example, the provision of free consultancy services.

### **9.4. Limitation of the Whistleblower's liability**

The Whistleblower is not liable for the disclosure of information on Violations:

- covered by an obligation of secrecy other than that referred to in Article 1, paragraph 3 of the Whistleblowing Decree (e.g. legal and medical professional secrecy), or relating to the protection of copyright or the protection of personal data;
- which offend the reputation of the Reported;

where at the time of disclosure, the Whistleblower had reasonable grounds to believe that the disclosure of the same information was necessary to disclose the Violation and the Report was made in accordance with the provisions of Legislative Decree 24/2023.

### **9.5. Anonymous Report**

The Whistleblower may also submit a Report anonymously. In such a case, should the identity of the anonymous Whistleblower be discovered in the course of the Whistleblowing Officer's investigations or of other verifications following the Report, the Whistleblower shall benefit from the protections provided for by Legislative Decree n. 24/2023, and shall be subject to the obligations and responsibilities provided for therein.

Kindly remind that in the event of an anonymous Report, the Whistleblowing Officers shall first assess its completeness, substantiation and relevance with respect to Legislative Decree n. 24/2023. Reports that are irrelevant and/or have generic, confusing and/or clearly defamatory content will not be taken into consideration and will therefore be archived.

### **9.6. Reported's rights**

The Reported has the right to confidentiality, as described in Article 9.1 of this procedure.

During the investigation of the Report, under no circumstances will disciplinary proceedings be initiated against the Reported, this being the exclusive prerogative of the function in charge.

In the event of initiation of disciplinary proceedings based on a Report, the Reported has the right to know all the elements on which the charge is based, with the sole exclusion of the identity of the Whistleblower where such information is not fundamental for the purposes of the proceedings. If the identity of the Whistleblower



is indispensable, the Whistleblower will be asked in advance to obtain his/her consent to such disclosure, without which it will not be possible to proceed.

## **9.7. Report in bad faith**

With regard to Reports in bad faith made by persons whose personal details are known, as declared since the beginning or identified during the investigation in the case of Anonymous Reports, and which are proven to be slanderous, defamatory, insulting, untrue or in any case made by the Whistleblower with malice or gross negligence, the measures provided for in the Company disciplinary system will be activated against the latter, as well as appropriate legal actions for protection of all the persons involved.

It should be noted that the protections provided for by Legislative Decree n. 24/2023 in favour of the Whistleblower do not apply where it is ascertained, in a court of first instance, that the Whistleblower has submitted Reports in bad faith, acting with malice or gross negligence, or by engaging in defamatory or slanderous conduct. In such cases, the protection of confidentiality relating to the name of the Whistleblower shall not be applicable and the name of the Whistleblower may be communicated to the Board of Directors for appropriate disciplinary measures.

The Company expects the Addressees of this procedure to cooperate in maintaining a climate of mutual respect for the dignity, honour and reputation of each other.

The Company shall intervene to prevent insulting and defamatory interpersonal attitudes.

Both the Whistleblowing Officers and the Company grant to the Reported adequate protection against Reports in bad faith by taking the most appropriate measures against the Whistleblower.

The Whistleblower shall be liable for Reports made with defamatory or slanderous intentions against the Reported, with wilful misconduct or gross negligence, the latter being the case in which the Whistleblower could have easily realised that the Report was unfounded.

In particular, the Whistleblower may be held liable for his or her conduct, both criminally and judicially, as well as at disciplinary level, pursuant to Article 16, paragraph 3 of Legislative Decree n. 24/2023, and may also be liable for any consequent image damage.

Moreover, pursuant to Article 21, paragraph 1, lett. c, the ANAC may impose on the Whistleblower in bad faith, for wilful misconduct or gross negligence, a sanction ranging from €500.00 to €2,500.00, unless the Whistleblower has been convicted, even at first instance, of the offences of defamation or slander or in any case of the same offences committed with the reporting to the judicial accounting authority.

In the event of Reports in bad faith, the Whistleblowing Officers reserve the right to archive the same, reporting the incident to the Board of Directors, in compliance with the appropriate precautions in terms of confidentiality and privacy of the persons involved, in accordance with regulatory provisions.

The Whistleblowing Officers are persons formally identified by the Company based on their competences, adequately trained and autonomous in the management of the Report procedure, appointed by the Company as Persons in Charge of Processing pursuant to privacy regulations.

They are responsible for managing the Report in accordance with the principles set out in the Whistleblowing legislation, as well as in the Privacy legislation (EU Reg. 2016/679 - GDPR - and Legislative Decree n. 196/2003 - Privacy Code).

In handling the Report, the Whistleblowing Officers respect the principle of minimisation, whereby they do not collect or retain any personal data of the Whistleblower or of the persons involved that is not strictly necessary, in accordance with the criteria of appropriateness and relevance to the purpose of the Report.

In the investigation phase, the Whistleblowing Officers have the possibility of carrying out the appropriate investigations and checks, in compliance with the principles set out herein, as well as, where necessary, of identifying third parties who can assist them in this activity.

The Whistleblowing Officers are also responsible for verifying any need to update this procedure and for proposing such adjustments to the Company.

The Whistleblowing Officers shall submit an annual report to the Board of Directors of the Company, in which, in compliance with the principle of confidentiality, they shall give an account of their work, summarising the types of Reports received and their progress, if any, and may propose any improvement actions to the Company that may help to improve the aspects previously reported.

## 10. Adoption and updates

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This procedure is approved by the Board of Directors of the Company, which is also responsible for updating and supplementing it through the Whistleblowing Officers.

The Addressees of this procedure are required to check for any updates prior to presenting a Report.

## 11. Annexes

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DOCUMENT	DESCRIPTION	MODULE OF REFERENCE
<b>Annex 1</b>	PRIVACY POLICY	PR_LE_02_ Whistleblowing Privacy Policy_Rev0_ENG

