



# Your voice matters: you are the best defense for TAKRAF Group's integrity.

**The Whistleblowing Line ensures the receipt, analysis, and management of reports of any misconduct or violation of internal or external regulations, in order to promote and grant a culture of transparency and integrity based on ethical behavior and compliance with the law.**

## **WHO can report**

Anybody can report: TAKRAF Group personnel, partners, clients, suppliers, and other external parties. TAKRAF allows anonymous whistleblowing reports.

## **WHAT to report**

Conducts by corporate bodies/employees/external collaborators that are illegal, allegedly illegal, in breach of the Code of Conduct, Code of Conduct for Suppliers, Conflict of Interest Procedure, Anti-Bribery Policy, and all internal and external applicable laws and regulations to TAKRAF Group.

Key information to include:

- **object:** clear description of the facts with the indication, if known, of the related time and place;
- **reported person** (i.e., the person who is suspected of misconduct or violation of internal or external regulations) and other involved persons, or any element that can favor the identification of the alleged author (e.g., job role/title) of the unlawful, suspected unlawful conduct.

It can also be included but is not an obligation, documents and further information that may facilitate the collection of evidence on the reported facts such as:

- whistleblower personal details (name, surname, role, etc.);
- indication, direct transmission, or attachment through the whistleblowing platform of any documents that may confirm the exposed facts and/or can be considered useful for reporting purposes.

## **EXCLUDED/IMPROPER reports**

Excluded are whistleblowing reports related to a personal interest of the whistleblower, which pertain to their individual labor relations, or inherent to labor relations with hierarchically subordinate figures (e.g., labor disputes, interpersonal conflicts between colleagues).

Whistleblowing reports cannot concern suspicions or information reported by third parties that do not have factual elements or supporting documents.



Whistleblowing reports **should not contain** insulting tones or personal offenses aimed at harming the honor and/or personal or professional decorum of the persons involved (e.g., defamatory of slanderous purposes only). In particular, whistleblowing reports are prohibited if:

- exclusively related to aspects of private life, without direct or indirect links with the professional activity of the involved persons and without any potential impact on the image/reputation of TAKRAF;
- containing discriminatory elements related to, for example, sexual, religious, or political orientation, gender identity, or the racial or ethnic origin of the reported person.

In case of a whistleblowing report containing such elements, the confidentiality of the whistleblower's identity, as well as other measures in place for the protection of the whistleblower, may not be guaranteed pursuant to the current legal provisions for the protection of the reported person.

### PROTECTION and CONFIDENTIALITY

- **Protection of the whistleblower** – TAKRAF protects the whistleblower by ensuring the confidentiality of their identity and expressly prohibiting retaliatory, discriminatory, or otherwise unfair conduct directly or indirectly related to the whistleblowing report. Whistleblowers in good faith can't be sanctioned, but whistleblowers in bad faith will be sanctioned.
- **Confidentiality** – TAKRAF ensures the utmost confidentiality of the report (including any document and information received or collected) and of both the whistleblower and the reported person; therefore, the information provided in the report shall not be communicated or divulged to people not directly involved in the evaluation and verification activities. The confidentiality of the whistleblower's identity may not be guaranteed if the whistleblower gave written consent to reveal their identity; if the reported person has to exercise its rights of defense; and/or if the identity of the whistleblower is required by the competent authorities in connection with their investigations.
- **Data protection** – The personal data of all those involved in the whistleblowing report will be processed in compliance with applicable laws and regulations on privacy and data protection.

### TAKRAF Group's whistleblowing management

After a whistleblowing report is received in the whistleblowing platform, TAKRAF Group takes charge of the whistleblowing report through the Qualified Advisor who sends the related notice of receipt to the whistleblower within 7 days or shorter, checks the self-evident eligibility of the whistleblowing report, and prepares a summary of the same.

The Qualified Advisor sends the summary and the whistleblowing report to the Group Compliance Officer and the Group Compliance Coordinator, who check the admissibility of the whistleblowing report and involve the Group Compliance Committee for its management.

As an exception, only in case one or more among the Group Compliance Officer, the Group Compliance Coordinator and members of the Group Compliance Committee are identified as Reported Persons, starting with the notification of the report by the Qualified Advisor, the reported persons are excluded from the management process. Through the whistleblowing platform, the whistleblower can receive updates on the management of the submitted report.

