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		'WHISTLEBLOWING' REPORTING METHOD		
Redaz. Gianluca BARBIERI	15/12/2023	Verifica	Approvaz.	

1. PURPOSES

This procedure describes the operating procedures provided in Stefal to comply with the requirements provided by the D.Lgs. n. 24 / 2023 – in implementation of the UE Directive 2019/1937 - concerning "the protection of persons reporting violations of Union law and laying down provisions concerning the protection of persons reporting violations of national regulatory provisions".

2. APPLICATION FIELD / DEFINITIONS

The English term 'whistleblowing' means the spontaneous revelation by an individual (called "whistleblower") of an offence or irregularity committed within an entity (public or private organization) witnessed/recognized in the performance of his duties.

The whistleblower may be an employee but may also be a third party, for example a supplier or a customer.

This procedure is applied to activities strictly related to Stefal Srl with validity from December 15 2023, date on which the procedure is disclosed and communicated to all interested persons by means of Company billboards and publication on the Company website.

3. OPERATIONAL RULES

Stefal s.r.l. makes specific reporting channels available to anyone who has become aware of illegal behavior (e.g. violations of Laws, Code of Conduct, Company Procedures, etc.)..

Reports can be forwarded:

- In writing via ordinary mail, by sending a registered letter to the following address:

Stefal s.r.l.

Whistleblowing Committee

Via Luigi Davia 9/P 40017 – San Giovanni in Persiceto (BO)

With reference to the analogue written form, it is suggested that the report should be inserted in two closed envelopes, including, in the first, the reporting person's identification data, together with an identity document; in the second, the subject of the report.


Both envelopes must then be inserted into a third envelope with the words "reserved for the report manager" on the outside.

- In oral form, through the telephone line dedicated for this purpose by the Company (telephone number +39 331 7572684) or, at the request of the whistleblower, through a direct meeting with the manager of the report, part of the Whistleblowing Committee.

The reporting service must be used to highlight serious risks to people, to the Company, to the community or to the environment.

The report can only refer to information on serious irregularities regarding:

- vital interests of the Company or the life or health of individuals, such as: serious environmental crimes, serious safety deficiencies in the workplace;
- forms of discrimination or harassment;
- bookkeeping, internal accounting controls, audit matters;
- fight against corruption, banking and financial crime.

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The report cannot concern:

- issues regarding dissatisfaction with one's working relationship or related problems (in this case staff are invited to contact their direct manager)
- disputes or claims
- requests linked to personal interests of the reporter
- situations of mandatory violations
- situations related to national security matters.

It is necessary for a person making a report to have evidence and evidence to raise suspicion and remember that the intentional reporting of false or harmful information is prohibited.

The staff responsible for evaluating and managing the report is identified in the Whistleblowing Committee, composed primarily of the General Manager of the Company and, if necessary, of the President himself.

The Company undertakes to protect the confidentiality of the identity of the whistleblower and to guarantee that no act of retaliation or discrimination, direct or indirect, is adopted against anyone who, in good faith, has made a report.

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