



WHISTLE-BLOWING POLICY

	Editor	Verification	Approval
Function	Customer Quality	Plant Management	CEO
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1. OBJECTIVES

This Policy is aimed at establishing the procedures through which it is possible to report illegal, commissive or omissive behaviors that constitute or may constitute a violation of the values and principles established by SOGO and / or that may cause damage of any kind (for example financial , environmental, on the safety of workers or third parties or even just damaging its image) , as well as to customers, members, third parties and, more generally, to the community. The principles of this Policy do not affect or limit in any way the obligations to report to the Judicial, Supervisory Authorities or competent regulations. This policy integrates the Operating Procedure for reporting violations of the Code of Ethics and of the Organization and Management Model pursuant to Legislative Decree 231/2001 and the "AIAG Corporate Responsibility Guidance".

2. ADDRESSEES

The addressees of this Policy are:

- a) employees and collaborators;
- b) customers, suppliers, consultants, partners and, more generally, stakeholders.

3. REPORTS

Recipients who disclose or otherwise become aware of possible illegal conduct or malpractice committed in the course of their work or having an impact on the same, are required to implement this Policy by reporting promptly facts, events and circumstances that they consider, in good faith and on the basis of reasonable factual elements, to have caused such violations and / or behaviors that do not comply with the principles of **SOGO**.

By "**Reporting**" it is meant the notification of possible illegal, commissive or omissive behaviors that constitute or may constitute a breach of laws and / or regulations, values and / or principles enshrined in the Code of Ethics and the Organization and Management Model pursuant to the Legislative Decree 231/2001.

The Reports can also be anonymous. However, **SOGO** recommends that the same should be nominative, in order to allow the responsible supervisors a more efficient investigation activity, applying in any case the protection granted.

The Reporting, even if anonymous, must be documented and precise, so as to provide the useful and suitable elements to allow an appropriate verification activity on the validity of the reported facts. It is particularly important that it includes, where such elements are known by the reporter:

- a detailed description of the facts that have occurred and how he became aware of them
- date and place where the event occurred;
- names and roles of the persons involved or elements that can allow their identification.
- names of any other person who can provide information on the events being reported;
- reference to any documents that can confirm the validity of the facts reported.

The entity responsible for receiving and verifying the report is the Plant Management.

The Report must be sent in the following manner:

- *by e-mail*, at the e-mail address: **lorenzo.agosti@sogo.it** ;
- by paper letter

The Plant Management will send a communication stating that it takes charge of the Report made, where it is possible to trace the sender.

It remains understood that upon verification of the validity of the Report received, whoever has made it can be contacted for the request for further information that may prove necessary.

4. CONFIDENTIALITY AND PROHIBITION OF REPRISAL

SOGO aims to encourage Recipients to promptly report possible illicit behavior or malpractice and guarantees the confidentiality of the Reporting and of the data contained therein, as well as the anonymity of the Reporter or of anyone who sent it, even in the case in which the same might subsequently prove false or unfounded.

No kind of threat, retaliation, sanction or discrimination will be tolerated against the Reporter and the reported Person, or whoever has cooperated in the feedback activities regarding the validity of the Report.

SOGO reserves the right to take appropriate action against any person who carries out, or threatens to carry out, acts of reprisals against those who have submitted Reports in accordance with this Policy, without prejudice to the right of those who are entitled to protect themselves legally in the event that criminal or civil liability has been identified in connection with the falsity of what was declared or reported, to the detriment of the reporter.

SOGO may undertake the most appropriate disciplinary and / or legal measures to protect its own rights, property and its image, against anyone, who has made false, unfounded or opportunistic reports, in bad faith, and / or with sole purpose of slandering , defaming or harming the reported person or other people mentioned in the Report.

5. INVESTIGATION ACTIVITY ON THE VALIDITY OF THE NOTIFICATION

The investigation activities regarding the merits of the circumstances described in the Reporting are the responsibility of the Plant Management to whom a timely and accurate investigation is required, in compliance with the principles of impartiality, fairness and confidentiality towards all the subjects involved.

During the verifications, the Plant Managers can avail themselves of the support of the relevant company departments, on a case-by-case basis and, where deemed appropriate, of external consultants specialized within the scope of the report received and whose involvement is functional to the verification of the Report, ensuring the confidentiality and anonymisation of personal data contained in the Report pursuant to Legislative Decree No. 196/2003 and European Regulation 679/2016 on Data Protection (GDPR).

At the outcome of the verification phase, the Plant Management prepares a summary report of the investigations carried out and of the evidences that emerged, sharing them, based on the results, with the competent company departments, in order to define any intervention plans to be implemented and the actions to undertake in order to protect **SOGO SPA** and also communicating the results of research and verifications carried out in relation to each Report to the heads of the corporate structures concerned by the contents of the same.

Otherwise, if at the end of the assessment, it is found that there are not sufficiently detailed elements or, anyway, that facts referred to in the Reporting are groundless, the latter will be archived, together with the related motivation, by the Plant Management. The Plant Management periodically informs the General Management about the different types of reports received and about the outcome of the investigation activities.

6. PROCESSING OF PERSONAL DATA

SOGO S.P.A. informs that personal data (including any sensitive data of the Reporters and other subjects involved, acquired during the management of the Reports, will be processed in full compliance with the provisions of the current regulations concerning the protection of personal data (see point 5)) and limited to those strictly necessary to verify the accuracy of the Reporting and to manage it. The processing of personal data will be carried out by the Plant Management for the sole purpose of implementing the procedures established in this Policy and, therefore, for the proper management of the received reports, as well as for the fulfillment of legal or regulatory obligations in full respect of confidentiality, fundamental rights and freedoms, as well as of the dignity of those affected. The processing operations will be assigned, under the supervision of the Plant Management Department, to some employees duly appointed as persons in charge and specifically trained in relation to the execution of *whistleblowing* procedures, with special regard to security measures and the protection of the privacy of the subjects involved and the information contained in the Reports. During the activities aimed at verifying the accuracy of the Reporting, all necessary measures will be taken to protect data from incidental or illicit destruction, loss and unauthorized disclosure. Furthermore, the documents relating to the Reporting will be kept, both in paper and electronic format, for a period not exceeding what is necessary for the correct finalization of the procedures laid down in this Policy.