

WHISTLEBLOWING CHANNEL

SOGELMA S.r.l., in order to comply with the provisions of Legislative Decree No. 24/2023 on Whistleblowing, has implemented and activated an internal reporting channel through the LegalWB platform.

Who can report?

According to Article 3 of Legislative Decree No. 24/2023, the following individuals are authorized to make reports:

- Employees, both subordinate and independent, working at the company;
- Freelancers and consultants providing services to the company;
- Volunteers, interns, and trainees, whether paid or unpaid, working at the company;
- Shareholders and individuals with management, administration, and control functions.

What can be reported?

The whistleblowing channel is a tool to report any illegal conduct relevant under Legislative Decree No. 231/2001 and violations of EU law listed in Annex 1 of Legislative Decree No. 24/2023.

How can one report?

The Decree has introduced new and significant protections for those making reports, including through digital means and encryption tools to ensure the confidentiality of the reporter's identity, all mentioned individuals, the content of the reports, and related documentation.

It is important to note that:

- The report is made by filling out a questionnaire;
- The platform allows for communication, even anonymously, between the reporter and the first-level handler of the report (a third-party, independent entity);
- The competent and independent entity proceeds with first-level management, performing an admissibility analysis, maintaining communication with the reporter, and requesting further information and details from them;
- Subsequently, the responsible party will communicate admissible reports to specific company stakeholders (anonymized unless the reporter provides explicit consent);
- It is recommended to frequently access the whistleblowing channel to monitor the progress of the report;
- Reports can be made from any digital device (PC, tablet, smartphone), both from within and outside the organization.

More information can be found in the "Whistleblowing Data Processing Policy" and the "Reporting Guide," available in the footer of the reporting channel.

To access the platform, click here: <https://sogelma.legalwb.it/>