

Guidelines for submitting internal reports through the Platform

Procedure for the Management of Whistleblowing Reports – Annex C

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THE WHISTLEBLOWING PLATFORM





THE WHISTLEBLOWING PLATFORM

Section 1

Have you become aware of possible **violations of regulations, unlawful conduct, behaviour, acts or omissions** that harm the public interest or the integrity of Objectway, and wish to report them to us?



In these Guidelines you will find **instructions** on how to send a report through our digital communication channel (**«whistleblowing platform»**), accessible at the following link:



https://objectwaywb_whistleblowing.keisdata.it/Home

Objectway's whistleblowing platform guarantees your **confidentiality** and offers you the possibility to remain completely **anonymous**, from the moment the report is received and at every stage thereafter.



When making a report, you are protected against any **act of retaliation or discrimination**.



STEPS TO FOLLOW

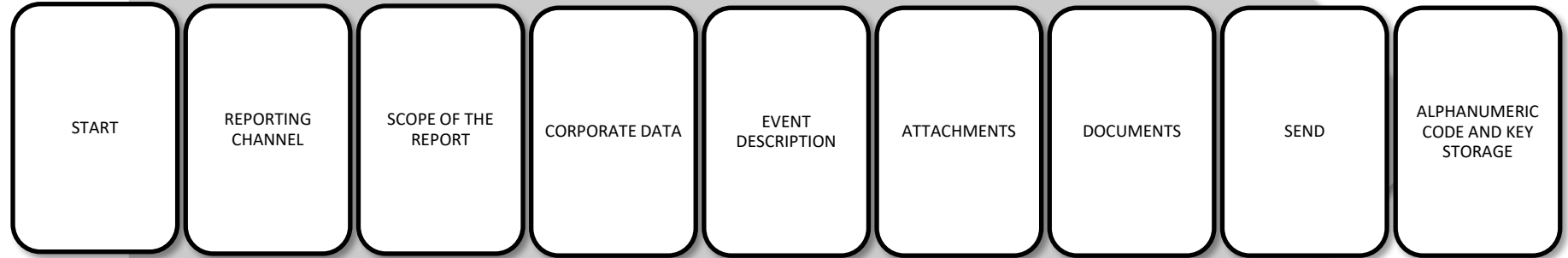




STEPS TO FOLLOW

Section 2

In the following, we will guide you step-by-step in entering your report into the whistleblowing platform





STEPS TO FOLLOW: A) START

Section 2



On the home page, you can select the platform **language** via this drop-down menu



Welcome to the platform for the management of reports of offenses, follow the steps to enter a new report or view the reports already entered, in total confidentiality

To review your report information or get updates, enter the CODE and KEY here

Code Key

If you have **already made a report** and would like to monitor its progress, enter the alphanumeric code and key associated with the report provided to you, and click on the green **'ENTER INTO THE REPORT'** button

To enter a **new report**, click on the red button **'INSERT NEW REPORT'**.

ENTER IN YOUR REPORT

WHISTLEBLOWING - ENTER NEW REPORT
OF BREACHES



STEPS TO FOLLOW: A) START (2)

Section 2



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All reports will be dealt with by the competent bodies; the report you are about to submit must be based on the detection of potentially illegal conduct and based on precise and consistent factual elements, of which you have come to know due to the working context. In any case, the competent body is required to maintain the confidentiality of the identity of the reporting party vis-à-vis the Company, except in cases expressly established by law (eg. Specific request by the Judicial Authority). This reporting channel ensures the confidentiality of your identity in reporting management activities. You can still choose to keep your anonymity and therefore the provision of personal data is to be understood as optional. However, this circumstance could nevertheless prejudice the investigation: anonymous reports, in fact, will be taken into consideration only if they are presented adequately detailed and made in great detail, in order to bring out facts and situations related to specific contexts. Finally, we remind you that the Company, as also required by the relevant legislation, has expressly provided for the prohibition of retaliation or discriminatory acts, direct or indirect, against anyone who makes a report for reasons connected, directly or indirectly, to the report itself.

Select the company of the Group to which your report relates:

Objectway Limited

1. Select the **Objectway Group** company you intend to report to

☒ I declare that I have read the information on the processing of personal data

2. Read the related documents and provide **consent to process your personal data**. Without your consent, we cannot follow up your report.

3. Click on «NEXT».

EXIT AND ABANDON

NEXT



STEPS TO FOLLOW: B) REPORTING CHANNEL

Section 2



Your report will be subject to a pre-assessment of validity by the dedicated function. If the report concerns one or more subjects of this function, as indicated below, you can proceed directly by selecting the Direct or Alternative Channel as reported. If the report is deemed to be well-founded, it will then be sent to the person in charge of the report chosen by you below from those proposed by the Company (Direct Channel or Alternative Channel) so that it can continue with the necessary checks and investigations.

The procedure provides for a preliminary assessment of the report carried out by:

Pre-Evaluation (UK)

Function consisting of :

Shanaz Sajawal (FINANCE & ACCOUNTING LEADER (UK))

Direct Channel and Report Manager:

Direct Channel (UK)

Function consisting of :

Shanaz Sajawal (FINANCE & ACCOUNTING LEADER (UK))

Marciano Maria Federica (Organization Director)

Rancati Eleonora (HR COUNTRY MANAGER (UKO&BE))



In this section you can see which subjects will be in charge of managing your report (Direct or Alternative Channel)

Alternative Channel, in the event that the report involves the Direct Channel Report Manager

Alternative Channel

Function consisting of :

Marciano Maria Manuela (LEGAL & COMPLIANCE DIRECTOR - Group)

Martinel Fabio (COMPLIANCE LEADER)



STEPS TO FOLLOW: B) REPORTING CHANNEL (2)

Section 2



Continue with the **normal process** and send the report to the **Direct Channel**.

The report concerns the Function: Pre-Evaluation (UK)

NO - CONTINUE WITH THE NORMAL PROCESS

YES - SKIP PRE-ASSESSMENT

Choice of pre-assessment

Pre-evaluation

The report concerns the Function: Direct Channel (UK)

NO - CONTINUE TO THE DIRECT CHANNEL

YES - CONTINUE WITH THE ALTERNATIVE CHANNEL

Channel Selection

Direct Channel

BACK

If your report, instead, concerns subjects in the Direct Channel, you can skip the pre-evaluation phase and submit your report directly to the **Alternative Channel**.

CONTINUE



STEPS TO FOLLOW: C) SCOPE OF REPORTING

Section 2

Start Reporting

Category of the reporting party

Employees (also during the probation period)

Main subject of the report

Violations

Violations of internal provisions of the individual Company, such as Code of Ethics

☐ Infringements of national provisions consisting of

- ☐ administrative, accounting, civil or criminal offences
- ☐ Relevant unlawful conduct pursuant to Legislative Decree no. 231/2001
- ☒ Violations of internal provisions of the individual Company, such as
 - ☐ Organization, Management and Control Model adopted pursuant to Legislative Decree 231/2001
 - ☒ Code of Ethics
- ☐ national collective agreements and, more generally, internal regulations (procedures, policies, operating instructions, etc.)
- ☐ Other

PREVIOUS NEXT

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Select from the menu the category of the reporter to which you belong (e.g. Employees).

Next, circumscribe the subject of the report by selecting which violations you consider to be covered by the conduct you reported (e.g. violation of a provision of the Code of Ethics).



STEPS TO FOLLOW: D) CORPORATE DATA

Section 2

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Start Reporting Corporate Data Event Description Attachments Documents Send

Company Area

- ☐ Human Resources
- ☐ ICT Managed Service
- ☐ Legal, Compliance & General Services
- ☐ Organization
- ☒ Product Development & Solution Delivery Tribe
- ☐ Sales Management
- ☐ SAS Tribe
- ☐ Service Management
- ☐ Other

Main subjects involved in the report

ADD Name Surname Role

1			
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Select from the menu the **area of the company** involved in the report (e.g. Product Development & Solution Delivery Tribe).

In addition, by clicking on «ADD», you have the possibility to indicate the **main subjects involved in the report**, indicating their name, surname and role.

You may also continue **without indicating any person** involved.

PREVIOUS

NEXT



STEPS TO FOLLOW: E) EVENT DESCRIPTION

Section 2



In this section you can enter a **textual description** of the fact you want to report or **request a meeting** with the reporting committee.

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Start



Reporting channel



Scope of the report



Corporate Data



Event Description



Attachments



Documents



Send

You can enter a text description of the event or ask for a direct meeting or proceed with a voice recording

If you want to proceed with the voice recording, we point out that no filters or distortions of any kind will be applied to your voice.

☐ I authorize voice recording

☒ I authorize voice recording



Enter a brief description of the event

Alternatively, you can also provide a description of the event through a **voice recording**.



No filters or distortions of any kind are applied to the voice in case a recording is made.



STEPS TO FOLLOW: F) ATTACHMENTS

Section 2



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Start



Reporting channel



Scope of the report



Corporate Data



Event Description



Attachments



Documents



Send

In this section you can attach useful documents to substantiate your report

ADD

By clicking on «ADD» you can attach any useful **documents** to contextualise the report.

You may continue **without attaching** any documents.

PREVIOUS

NEXT



STEPS TO FOLLOW: G) DOCUMENTS

Section 2



Start

In this section you can indicate whether you are aware of any **documents** useful for reporting that **you are not in possession of**, specifying **where they** can be found.



Event Description



Attachments



Documents



Send



I am aware of documents useful for reporting filed in

Indicate where the documents are stored

Reachable in the following ways

Indicate link or path to reach document folder

Indicate another method (ex: summon responsible person xyz)

The facts have already been reported to another authority or internal entity

☐ Yes

☐ No

In addition, you can report whether **you have already reported the offence** to another authority or internal entity.

PREVIOUS

NEXT



STEPS TO FOLLOW: H) ENTER

Section 2



This is the **last step**: we ask if you want to provide your **identification** and **contact details** to the Reporting Manager.



Corporate Data



Event Description



Attachments



Documents



Send

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Please note that the competent body that will take charge of the report is required to maintain the confidentiality of the identity of the whistleblower vis-à-vis the Company, except in cases expressly established by law (for example, upon specific request by the Judicial Authority).

Do you want to send your contacts to the Reporting Manager?

☐ Yes

☐ No

Please note that this communication channel, from the moment the report is received and at every stage thereafter, **guarantees your confidentiality**.
If you prefer, you can also not provide your data and remain **anonymous**.



Are you sure you want to submit the report? Then press «**SEND**».

PREVIOUS

SEND



STEPS TO FOLLOW: I) ALPHANUMERIC CODE AND KEY STORAGE

Section 2



When you submit your report, the platform will issue you with the **alphanumeric code** of the report and the corresponding **key**.

The code and key are **indispensable** in order to be able to monitor the progress of your report and to respond to any requests for clarification or supplementation of information.

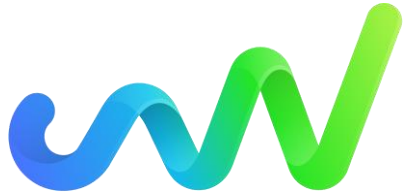


**KEEP THE CODE AND
KEY CAREFULLY!**

To monitor the progress of the report, **remember to log in to the platform periodically** by entering the code and key on the **home page**.

To review your report information or get updates, enter the CODE and KEY here

Code _____ Key _____



**THANK YOU
FOR YOUR ATTENTION**