



COLLABORATORS INFORMATION

ACTIVATION OF WHISTLEBLOWING IT CHANNEL

This information notice is addressed to all subjects who have relationships with F.A.R.M.A. Srl and are entitled to report any corporate misconduct in which they are directly involved or of which they have become aware, pursuant to Legislative Decree 24/2023. This information notice aims to illustrate to potential reporting subjects, in a clear and concise manner, the reporting channel made available for so-called Whistleblowing on the Company's website, its operating mechanism, the procedural process and the terms of response and compliance with legal provisions in the matter by the Company. Below is an illustration of the path to follow to make a report. F.A.R.M.A. Srl reserves the right to change, modify, add or remove any part of this information notice at any time.

DATA CONTROLLER

The Data Controller is F.A.R.M.A. Srl, VAT number 00662650373, with registered office in Medicina, Via Galileo Galilei 171 - Fossatone District, 40059 (BO) represented by its legal representative Antonio Dolgetta, contactable at the email address: farma@farmagroup.it

1. PURPOSE OF PROCESSING AND LEGAL BASIS

The data provided through completion of the format made available on the dedicated platform or contained in the documentation attached and/or that which will be requested and collected during the report management procedure, will be processed for the following purposes:

a) Compliance with legal obligations that require the Controller to have an information channel to receive and manage Reports in all its phases, including the verification of facts subject to reporting and adoption of any consequent measures and guarantee of adequate application of the procedure. **Legal Basis:** Art.6, par.1, lett.c) EU Reg. - Compliance with a legal obligation.

b) Possible processing of data by the Data Controller to satisfy its legitimate interests, pursued directly or by specifically appointed third parties which include or could include in the future: management, verification of the truthfulness of the report and performance of any activity necessary for its management; defense needs of rights during judicial, administrative or extrajudicial disputes and in the context of disputes arising in relation to the report made. **Legal Basis:** Art.6 lett. f) EU Reg. - Pursuit of a legitimate interest.

The provision of data referred to in points a) and b) is mandatory and their non-provision or partial provision makes it impossible for the Controller to achieve the purposes indicated above.

The provision of personal data is instead optional, based on the Whistleblowing Procedure adopted by the Company.

2. CATEGORIES OF DATA PROCESSED

The personal data collected and processed by the Controller fall into the following categories:

- **Data relating to the report:** information contained in the report, including personal data of the reported subject(s), such as, for example, name, surname, company role (hereinafter also "Personal Data").
- **Personal Data of the suspected Reporter of an optional nature:** name, surname, contact details such as email address and telephone number.
- **Particular Data if necessary for reporting purposes:** health data, trade union membership, data suitable to reveal racial origin, political opinions, religious or philosophical beliefs;
- **Data relating to criminal convictions or crimes if necessary for reporting purposes:** suitable to reveal criminal convictions, commission of crimes or subjection to security measures.



3. CHARACTERISTICS OF THE REPORT

3.1 Subject of the report

Pursuant to art. 2 of Legislative Decree no. 24/2023, violations committed within the Company with which the reporter or complainant maintains a legal relationship may be the subject of reporting.

May be the subject of reporting violations of national or European Union regulatory provisions that harm the public interest or the integrity of the Company, of which the reporters have become aware in the work context. In particular, violations must be understood as those:

- committed or not yet committed that the Reporter reasonably believes could be based on concrete elements.
- having as their object behaviors, acts or omissions of which the Reporter has become aware within the work context.

Are excluded:

- news that is clearly unfounded;
- information that is already completely in the public domain;
- information acquired solely on the basis of indiscretions or scarcely reliable rumors (so-called "corridor gossip");
- reports of simple non-conformities related to the management of business processes and workplace safety, which must be reported through channels other than the Whistleblowing channel;

Based on the subject, violations can be distinguished as follows:

- violations of national law; civil offenses; administrative offenses;
- illicit conduct relevant pursuant to Legislative Decree no. 231/2001, violations of the organization and management models provided for in Legislative Decree no. 231/2001 (MOG); criminal offenses;
- accounting offenses;
- offenses committed in violation of EU legislation indicated in Annex 1 to Legislative Decree no. 24/2023 such as: offenses relating to public procurement, services, products and financial markets, prevention of money laundering, product safety and compliance, environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy protection and personal data protection and security of networks and information systems;
- acts or omissions that harm the financial interests of the European Union;
- acts or omissions concerning the internal market, which compromise the free movement of goods, persons, services and capital;
- acts or behaviors that nullify the object or purpose of European Union provisions in the sectors indicated in the previous points.

Reports must be made in good faith, detailed and based on precise and consistent factual elements, also in order not to disperse the effectiveness of the channel made available.

Anyone who makes reports with intent or gross negligence that subsequently prove to be unfounded may be subject to disciplinary sanctions.

3.2 Reports that do not benefit from the protections provided by Legislative Decree 24/2023.

Complaints, claims or requests linked to a personal interest of the reporter that relate exclusively to their individual work relationships, or concerning their work relationships with hierarchically superior figures.

No protection applies in the case of ascertained (with first instance sentence) criminal or civil liability - for intent or gross negligence - of the reporter for defamation or slander. Disciplinary sanctions are provided by law in such cases.

Subjects entitled to Internal Reporting

Farma srl guarantees absolute respect for the prohibition of implementing any retaliatory act against persons who make reports pursuant to Legislative Decree 24/2023.

Therefore, no disciplinary or other type of action is permitted due to a report against the Reporter.

Pursuant to art. 3 of the aforementioned Decree, the following subjects may make reports, benefiting from the protections provided by the same:



- employees of Farma srl company;
- persons with administration, direction, control, supervision or corporate representation functions, even when such functions are exercised as a matter of mere fact;
- shareholders;
- self-employed workers, freelancers and consultants who carry out their work activity for Farma srl; • collaborators of companies supplying goods or services;
- volunteers and interns, paid and unpaid, who provide their activity at Farma.

The report can be made during the work relationship or other type of legal relationship, but also during the probationary period and before (for example, during the candidacy phase) or after the dissolution of the work relationship or legal relationship (for example, during the retirement phase).

Indirect actions are also not permitted against:

- facilitators;
- persons from the same work context as the reporting person, of the one who filed a complaint with the judicial or accounting authority or of the one who made a public disclosure and who are linked to them by a stable emotional or kinship bond within the fourth degree;
- work colleagues of the reporting person or of the person who filed a complaint with the judicial or accounting authority or made a public disclosure, who work in the same work context and who have a habitual and current relationship with said person.

4. REPORT MANAGEMENT

For maximum protection of the "Reporter" and the "Reported," necessary security measures have been adopted.

Regardless of the choice made by the "Reporter" to make a report anonymously or not, the confidentiality of the identity of the writer and the content of the report is guaranteed through secure protocols and encryption tools that allow protection of personal data and information provided. The identity of the reporter is never revealed without their consent except in cases provided by current legislation.

Finally, it is informed that reports transmitted through the Portal prepared for this purpose will be communicated and managed by a Supervisory Body (ODV) in monocratic composition, appointed by the company.

This subject has been identified in the professional figure of Eng. Massimo Di Menna.

In addition to the information provided, it is possible to view the "Whistleblowing" procedure issued by the Company and available in the designated channel.

5. CONFIDENTIALITY GUARANTEES

Confidentiality guarantees are the same for both anonymous and ordinary (non-anonymous) reports.

The IT platform - illustrated below - ensures that communications received from the Reporter are managed with confidentiality guarantee both regarding the identity of the Reporting subject and regarding the content of the reports. Identity and content are protected through security measures and encryption techniques suitable to guarantee maximum secrecy pursuant to EU Regulation 2016/679 on personal data protection.

Furthermore, all persons involved in any capacity in the report management process are required to treat the content and documentation with maximum confidentiality.

The identity of the Reporter - and any other information from which such identity can be inferred, directly or indirectly - must be kept confidential in every phase of report management, except with express written consent from the Reporter. In case of initiation of a disciplinary proceeding in which the Reporter's identity is indispensable for the defense of the accused, the Reporter is notified through written communication and may decide whether or not to give consent to the revelation of their identity so that their report can be used for the proceeding.

6. PROCEDURAL PROCESS

In compliance with legal obligations, the Company has equipped itself with a platform provided by a selected partner that adopts a system for corporate misconduct reports compliant with sector regulations.

The subject victim of corporate misconduct or a third party who is aware of a corporate misconduct phenomenon that has already occurred or potentially configurable in the future can send an anonymous report or, at their choice in non-anonymous form (absolute confidentiality will be guaranteed as specified above), through the Whistleblowing Portal,



positioned in the footer of the corporate website: <https://farmagroup.it/>

On the initial page there are two buttons and a link:

- "Send a report" (for internal reports to the Manager).

"Access";

- "Link" found at the bottom of the opening screen, which allows easy and quick access to the ANAC channel for external reports (only in cases provided by the regulation).



Invia una segnalazione

Hai già effettuato una segnalazione? Inserisci la tua ricevuta.

Accedi

Per il portale ANAC consultare: www.anticorruzione.it/-/whistleblowing

By clicking on "Send a report," the Reporter accesses a questionnaire composed of open and/or closed questions that will allow providing the characterizing elements of the report (facts, temporal context, etc).

The Reporter will have the option to attach documents, images (electronic files) that they deem useful to support and/or integrate the misconduct report.



1 Segnalazione 2 Identità Segnalante 3 Passo Conclusivo

Descrivi in poche parole la tua segnalazione. *

Descrivi la tua segnalazione in dettaglio. *

Dove sono avvenuti i fatti? *

Quando sono avvenuti i fatti? *

Come sei coinvolto/a nel fatto segnalato? *

Seleziona un'opzione

Hai delle prove a supporto della tua segnalazione? *

Seleziona un'opzione

Hai segnalato i fatti ad altre organizzazioni o ad altri individui? *

Seleziona un'opzione

Qual è il risultato che vorresti ottenere con il nostro supporto? *

Successivo ➔

Per il portale ANAC consultare: www.anticorruzione.it/-/whistleblowing



At the end of completing the questionnaire, the Portal will ask the Reporter whether or not they intend to provide their identity.

It is reminded that providing one's identity is optional since one of the Reporter protections provided by the regulation is precisely confidentiality and/or anonymity to facilitate reports.

Segnalazione 2 Identità Segnalante Passo Conclusivo

Informative *

La informiamo che in caso di segnalazione anonima la stessa verrà considerata come ordinaria e vigeranno, pertanto, le disposizioni di cui all'art.16 co 4 li lgs. 24/2023. La segnalazione anonima ricevuta viene registrata e conservata per 5 anni al fine di poterla rendere rintracciabile nel caso in cui il segnalante, o chi abbia spinto denuncia, comunichi ad ANAC di aver subito misure ritorsive a causa di quella segnalazione o denuncia effettuata in forma anonima.

Confermo presa visione

Vuoi fornire i tuoi dati identificativi?

Nome

Cognome

Numero di telefono

Indirizzo email

Precedente Successivo

The final step follows, which consists of accepting and sending the report.

Segnalazione Identità Segnalante 3 Passo Conclusivo

Informative Privacy *

professionale). Nel caso in cui lei esercitasse uno qualsiasi dei summenzionati diritti, sarà onere della Società verificare che lei sia legittimato ad esercitare e dare riscontro, di regola, entro 30 giorni decorrenti dal momento in cui si è a conoscenza della richiesta. Lei potrà fare richiesta di esercitare tali diritti contattando la Società all'indirizzo e-mail: info@edhr.it o, in alternativa, il Responsabile della Protezione dei dati (DPO) ai seguenti dati di contatto:
Ing. Massimo Di Menno
PEC: massimo.dimenno@ingpec.eu ;
e-mail: massimo.dimenno@gruppoingegneria.it
Nel caso ritenga che il trattamento dei Dati Personali a lei riferiti avvenga in violazione di quanto previsto dal GDPR ha il diritto di proporre reclamo al Garante per la protezione dei dati personali, utilizzando i riferimenti disponibili sul sito internet www.garanteprivacy.it, o di adire le opportune sedi giudiziarie.
MODIFICHE E AGGIORNAMENTI
La Policy e la Piattaforma potranno essere soggette a revisione periodica e aggiornamenti per garantire il costante allineamento alla normativa di riferimento.

Confermo di aver preso visione e di accettare l'informative privacy

Precedente Invia

Your report was successful.

Use the 16-digit receipt to return and see any messages we have sent you or if you think there is something else you should have attached.

La tua segnalazione è andata a buon fine.

Grazie. La tua segnalazione è andata a buon fine. Cercheremo di risponderti quanto prima.

Memorizza la tua ricevuta per la segnalazione.

6268 7760 0441 5115

Usa la ricevuta di 16 cifre per ritornare e vedere eventuali messaggi che ti avremo inviato o se pensi che ci sia altro che avresti dovuto allegare.

Vedi la tua segnalazione

Per il portale ANAC consultare: www.anticorruzione.it/-/whistleblowing

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The code will be used by the Reporter to access their report through the Portal.

To do this, it will be sufficient to enter the code in the appropriate space located on the initial screen and then click on "access." Through this procedure the Reporter can:

- a) monitor the progress status of the report;
- b) insert additional elements to detail the report;
- c) possibly provide their personal details;
- d) respond to any in-depth questions.

Within 7 (seven) days the report is taken over by the appointed Supervisory Body. Subsequently, the subject managing the reports, through the portal, can interface with the reporter through the dedicated messaging system if they deem necessary any further investigation or, if already in possession of all necessary elements, can provide feedback to the reporter through the portal. In any case, even when the report does not constitute a misconduct and/or proves unfounded or erroneously presented (due to its contents) on an unsuitable channel, feedback is provided to the reporter within 3 (three) months from the date of receipt notice, a date that the portal makes coincide with that of sending the report.

7. RETENTION PERIOD

Reports and related documentation are kept for the time necessary for processing the report and in any case not beyond five years from the date of communication of the final outcome of the reporting procedure.

8. RIGHTS OF THE DATA SUBJECT

In relation to the aforementioned processing and related data existing in our archives, **the rights referred to in Chapter III, arts. 15 to 22 of EU Regulation 2016/679 may be exercised**, specifically: right of access (art.15), right of rectification (art.16), right to erasure (so-called right to be forgotten, art.17), right to restriction of processing (art.18), right to data portability (art.20), right to object (art.21).

In order to exercise your rights, you may contact the undersigned Controller, e-mail: farma@farmagroup.it.

9. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Pursuant to art.13, paragraph 2, lett. d) You are informed of the right to lodge a complaint with the Data Protection Authority if you find a violation of your rights as a data subject or for matters relating to the processing of your personal data.

F.A.R.M.A. SRL