METALSECURE

MODEL FOR REPORTING ILLEGAL CONDUCT (c.d. whistleblower)

QA105	
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Employees, collaborators and suppliers who intend to report unlawful situations (facts of corruption and/or non-compliant activities against our company, facts of alleged tax damage or other administrative offenses and in violation of the code of conduct) of which they are become aware in the company must use this model.

It is recalled that the law protects employees who report the offence. In particular, the law and the National Anti-Corruption Plan (P.N.A.) provide that:

- the company has an obligation to set up systems to protect the confidentiality of the identity of the whistleblower;
- the identity of the whistleblower must be protected in every context following the reporting. In disciplinary proceedings, the identity of the whistleblower cannot be disclosed without his consent, unless his knowledge is absolutely essential for the defense of the accused;
- the company is formally committed not to inflict retaliation against anyone who makes a complaint
- the complaint is removed from the access provided for by articles 22 ss. of the law 7 August 1990, n. 241;
- the complainant who believes that he has been discriminated against in his work because of the complaint can report the facts of discrimination to the Labor Inspectorate (also through the union). For further information, it is possible to consult the P.N.A.

The report can be presented by completing this form and delivering it in the box.

NAME AND SURNAME OF THE REPORTER	
PROFESSIONAL QUALIFICATION OR POSITION ¹	
DEPARTMENT	
TEL/CELL:	E-MAIL:
DATE/PERIOD IN WHICH THE EVENT OCCURRED (gg/mm/aaaa):	
PHYSICAL PLACE WHERE THE EVENT OCCURRED: indicate department name	
I BELIEVE THAT THE ACTIONS OR OMISSIONS COMMITTED OR ATTEMPTS ARE ² : DESCRIPTION OF THE EVENT (CONDUCT AND EVENT):	□ criminally relevant; □ implemented in violation of the Code of Conduct or other provisions; □ subject to disciplinary sanctions; □ likely to cause financial damage to the company; □ likely to damage the image of the administration; □ Other (specify):
AUTHOR(S) OF THE FACT ³	1. 2. 3.
OTHER POSSIBLE PERSONS KNOWLEDGE OF THE FACT AND/OR ABLE TO REPORT ON THE SAME 4	1.
	2. 3.
ANY ANNEXES TO SUPPORT THE REPORT	1.
	2.
	3.
PLACE, DATE AND SIGNATURE	

¹ If the whistleblower holds the position of public official, the sending of this report does not exempt him from the obligation to report the criminally relevant facts and the hypotheses of tax damage to the competent judicial authority.

² The report does not concern grievances of a personal nature by the whistleblower or requests pertaining to the discipline of the employment relationship or relations with the hierarchical superior or colleagues, for which reference must be made to the competent personnel service and to the Single Guarantee Committee.

3 Indicate personal data if known and, if not, any other element suitable for identification.

⁴ Indicate personal data if known and, if not, any other element suitable for identification.