possibility of applying the sanctioning system to a person making a report in bad faith could be assessed. 6) Communication to relevant External bodies where

deemed necessary

INDUSTRIE CELTEX WHISTLEBLOWING **PROCEDURE FLOW DESCRIPTION OF THE ACTIVITY** PROFESSIONAL FIGURE FLOW Identifying the Chairman of the Industrie Top Management Celtex S.p.A. SB (RMS) **Reporting Management Structure** Sending the Report. 2 WHISTLEBLOWER **FACILITATOR** Indication of Facilitator, if any. Oral form: MEETING WITH THE RMS OR Use of Forms and Tools envisaged by the Internal Channel TRADITIONAL MAIL VOICE MESSAGE VIA DEDICATED PLATFORM 3 WHISTI FRI OWER set up by the Company THE PLATFORM (three envelopes) REPORT Handling the report RMS MANAGEMENT STRUCTURE Handling the report in case of conflict of REPORT Chairman of the Board of MANAGEMENT interest with the RMS Auditors STRUCTURE Acknowledging receipt to the Whistleblo Notice re: report REPORT 6 handling MANAGEMENT of the report and of the handling thereof within 7 days. STRUCTURE Pre-analysis: Does the report fall within the cases envisaged by (It.) Leg. D no. 24/23, with reference to "Unlawful conduct relevant under lt. Leg. D. 231/2001, violations of organisation and REPORT MANAGEMENT management models envisaged by (It.) Leg. D. no. **STRUCTURE** 231/2001" and to the "Offences YES committed in violation of EU law and acts or omissions affecting the EU's financial interests"? Possible discussion with the identified internal contact person REPORTING HUMAN RESOURCES 8 ______ : Human Resources Department MANAGEMENT MANAGER **STRUCTURE** REPORTING GENERAL 9 Possible emergence of conflict of interest MANAGEMENT STRUCTURE the activity is aimed at acquiring, in the utmost confidentiality, all useful elements to assess the REPORTING 10 report. Person supporting the RMS in the preliminary MANAGEMENT The RMS may need to make use of other parties STRUCTURE investigation phase (internal and/or external) in order to complete the preliminary investigation. valuation and final outcome: 1) the evaluation is carried out on the basis of the elements gathered during the preliminary investigation phase. End-ofnvestigation 2) issue of the end of investigation report with if conflict of interest REPORTING 11 evaluation of the contents of the report and its MANAGEMENT transmission to the relevant subjects. STRUCTURE BoD ard of Statutory Auditors 3) Positive outcome = the report is true; Negative **outcome** = the report is unfounded. YES 4) Those to whom the final report is addressed make suggestions for the possible BoD ard of Statutory Audito application of sanctioning procedures. 5) Communication to Internal Bodies for disciplinary BODIES RECEIVING measures THE OUTCOMES under the Sanctions System. This phase could also be Internal BODIES OF THE REPORTS triggered in the event of a negative outcome, as the

External

BODIES



WHISTLEBLOWING **PROCEDURE FLOW**

FLOW RMS archive

