

Appendix “A” – Information Document pursuant to Art. 5 letter e) of the WB Decree

WHEREAS

On 30 March 2023, the Legislative Decree no. 24/2023 (hereinafter, the "**Whistleblowing Decree**" or "**WB Decree**") implementing the EU Directive 2019/1937, on the protection of persons who report breaches of European Union or national law (so-called *whistleblowing*) came into force. CR International s.r.l. (hereinafter, "**CR International**" or the "**Company**") intends to fully comply with the provisions introduced by the WB Decree by strengthening its *whistleblowing* system through the establishment of an internal **whistleblowing** channel (the "**Whistleblowing Channel**" or "**WB Channel**") for the receipt and management of whistleblowing reports (the "**Report(s)**") as well as by adopting the appropriate protection and guarantee measures for persons who report alleged offences of which they have become aware in their own work context (the "**Whistleblower(s)**").

VIOLATIONS: WHAT TO REPORT?

Through the WB Channel set up by CR International, it is possible to report:

- behaviour or facts;
- well-founded suspicions;
- irregularities or anomalies (so-called symptomatic indices);

learned by virtue of or in the course of work duties, which integrate or are, on the basis of concrete elements, potentially capable of integrating:

- (i) unlawful conduct such as to constitute offences giving rise to the liability of entities pursuant to Legislative Decree 231 of 2001 (the "**Decree 231**"), such as, by way of example only: corruption, fraud to the detriment of the State, false corporate communications, receiving stolen goods and money laundering; as well as violations of the provisions of the Organisation, Management and Control Model (the "**Model 231**") adopted by CR International pursuant to Decree 231, including, among others, the Code of Ethics;
- (ii) violations¹ falling within the scope of the European Union or national acts listed in the Annex to the Directive relating to the sensitive sectors expressly provided for² ;
- (iii) acts or omissions potentially damaging to the financial interests of the European Union;
- (iv) acts or omissions affecting the internal market, including violations of competition and state aid rules.

REPORTERS: WHO CAN REPORT?

The WB Channel is at the disposal of all parties with a legal relationship with CR International, e.g:

- (a) workers (or employees), including part-time, fixed-term, casual, or apprenticeship workers;

¹ **Violation** shall mean any act or omission committed in violation of the provisions of the European Union and national acts referred to in the aforementioned matters, as well as any act or omission that frustrates their object or purpose.

² The areas mentioned are, among others, the following: public procurement; financial services, products and markets; prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety; animal health and welfare; public health; consumer protection; insurance distribution, etc.

- (b) self-employed persons working at CR International;
- (c) self-employed professionals and consultants working at CR International;
- (d) paid and unpaid volunteers and trainees working at CR International;
- (e) shareholders (natural persons), *managers* or directors, and all persons exercising, even de facto, administrative, management, control, supervisory or representative functions at CR International;
- (f) workers and collaborators of entities providing goods, services or carrying out works for third parties.

The indicated persons may also submit Reports at all stages relevant to their relationship with CR International, and in particular:

- in the course of the legal relationship;
- during the selection phases or in any case prior to the finalisation of the legal relationship;
- within the probationary period;
- after the dissolution of the legal relationship, if the information on violations was acquired before the dissolution of the relationship.

THE WB REPORTING CHANNEL: *HOW TO REPORT?*

In accordance with the provisions of the Whistleblowing Decree, CR International has set up the WB Channel for the transmission and management of Whistleblowing Reports, through the digital platform provided by Ausind s.r.l. called "Whistleblowing4you", available by telephone or via the Internet at the link: <https://whistleblowing4you.ausind.it/crinternational>

The WB Channel of CR International:

- is available to Whistleblowers, 24 hours a day, 365 days a year;
- allows, by means of a special drop-down menu on the platform, to report in a segregated and dedicated manner any violations referable to the Italian *branch* of CR International;
- allows confidential and confidential reports to be sent, including through the use of encryption tools, either identifying the reporter or, if the reporter so wishes, anonymously, orally (by telephone) or in writing, through the website: <https://whistleblowing4you.ausind.it/crinternational>; in particular
 - no phone calls or incoming number identification are traced,
 - A log (or log) of internal connections with Internet Protocol (IP) addresses is neither generated nor maintained,
 therefore no information on the reporter's computer is recorded.

The telephone numbers for **oral reports** are as follows:

- from Italy: 3382689864;
- from abroad: 3382689864;

At the Whistleblower's request, the Report may also be made through a **direct meeting** with the entity entrusted with the management of the WB Channel. Should the Whistleblower request it, the direct meeting is:

- set within a reasonable time limit;
- carried out in such a way as to ensure the confidentiality of the identity of the Whistleblower, the identity of the reported person and the persons involved, and the content of the Report.

REPORT MANAGEMENT: *WHAT HAPPENS AFTER THE REPORT IS SENT?*

The management of the WB Channel is entrusted to Lwy Stanislaw Lucheschi, the member of the Company's monocratic Supervisory Board appointed pursuant to Legislative Decree No. 231/2001.

When a Report is sent, the WB Channel Manager:

- issues an acknowledgement of receipt of the Report within 7 days of its receipt;
- maintains contacts with the reporter and requests any additions, if necessary;
- diligently follows up the Report;
- provides feedback to the Reporting Officer within 3 months of the date of receipt of the Report.

As part of the diligent "follow-up" to the Report, the WB Channel Manager shall:

- (i) assess the admissibility of the Report;
- (ii) order the possible initiation of an investigation - to be carried out, if necessary, with the support of external professionals - into the facts or conduct reported in order to assess its existence;
- (iii) provide feedback to the Whistleblower, i.e. communication on what CR International has done, or intends to do, in order to assess the existence of the facts and any measures taken as a result of the investigation.

The feedback, therefore, may consist of, among others:

- in the communication of the filing of the Report on the ground that it is unfounded or for other reasons relating to the impossibility of proceeding with the investigation;
- communication of any measures taken as a result of the investigations conducted, such as, *inter alia*: (i) the adoption of disciplinary measures; (ii) referral to other competent functions or authorities for further investigation;
- in the interim communication on the progress of investigative activities in the case of particularly complex investigations.

PROTECTION MEASURES: *WHAT ARE THE GUARANTEES FOR WHISTLEBLOWERS?*

Whistleblowers who, in good faith, have forwarded a Report through the WB Channel, as well as further persons involved in or in any case referred to by the Report, benefit from various protection and guarantee measures provided for in the Whistleblowing Decree³; in particular:

- **protection of confidentiality**: CR International undertakes to keep confidential the identity of the reporter and of the persons involved, as well as the content of the Report; therefore, the relevant information cannot be used beyond what is necessary to follow up the Report; the disclosure of the identity of the reporter, on the other hand, is allowed only in exceptional cases expressly provided for by the reference legislation, after written communication to the reporter himself/herself on the reasons underlying the request for disclosure of his/her identity and only after obtaining his/her express consent;

³ The protective measures of the WB Decree also apply to: (i) the facilitators, i.e. the natural persons who have assisted the Whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential; (ii) the Whistleblower's colleagues, i.e. the persons in the same work context as the Whistleblower, linked to the latter by: a. a stable affective or kinship linked up to the fourth degree; b. a habitual and current relationship; (iii) the entities owned - either exclusively or in majority participation by third parties - by the reporter, or for which the reporter works, as well as entities operating in the same work context as the reporter.

- **protection against retaliation**: the Whistleblower and further protected persons are protected against retaliatory and/or discriminatory conduct, even if only attempted or threatened, carried out on account of the Whistleblowing, which causes or may cause unjust damage (such as, *inter alia*, dismissal, demotion, relocation, adoption of undue disciplinary measures, intimidation and/or harassment and/or causing damage also to third parties, where the Whistleblower is responsible for such conduct);
- **Limitation of liability**: any person who, in the context of a Report, discloses or disseminates information covered by secrecy, relating to copyright or the protection of personal data, or offending against the reputation of the person involved or denounced, shall not be liable under criminal, civil or administrative law.
This limitation of liability applies only on condition that: (i) a Report was made that, *ex ante*, could be deemed correct on the basis of the information known, and (ii) the conduct, acts or omissions made were related to the Report and strictly necessary to disclose the breach.

ADDITIONAL REPORTING CHANNELS

Both the Directive and the Whistleblowing Decree favour the WB Channel as the main means for the transmission of Whistleblowing Reports. However, the Whistleblower may resort, residually, to two further reporting channels: the external reporting channel established at ANAC and public disclosure.

- **EXTERNAL CHANNEL**

The Complainant may make the Report through the external reporting channel set up at the ANAC (the '**External Channel**') if, at the time of its submission, one of the following conditions is met:

- a) the Complainant has already made an internal Report via the WB Channel, but this was not followed up;
- b) the Whistleblower has reasonable grounds to believe that, if he or she made an internal Report, it would not be effectively followed up, or that the Report might lead to the risk of retaliation;
- c) the reporter has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

In any case, also for the External Channel:

- the confidentiality of the identity of the reporter and of the persons involved, as well as of the contents of the Report and of the relevant documents produced, is guaranteed;
- Reports may be made in writing or orally, or, at the request of the Whistleblower, by means of a face-to-face meeting;
- the same deadlines are set as for Internal Reporting (i.e. acknowledgement of receipt within 7 days and response within 3 months, or, if there are justified and substantiated reasons, within 6 months)⁴.

⁴ Please note that, pursuant to Article 10 quinquies of Legislative Decree No. 209 of 7 September 2005 ("Private Insurance Code"), IVASS may also, *inter alia*, receive reports from, *inter alia*, the staff of insurance undertakings for breaches of the Private Insurance Code as well as of directly applicable European Union provisions. At present, however, the conditions, limits and procedures for the relevant reports have not yet been established.

- PUBLIC DISCLOSURE

As a tool of "*last resort*" under the WB Decree, the Whistleblower may make a public disclosure, understood as the action of putting information about violations into the public domain through, e.g., the press, electronic media or otherwise by means of dissemination. To the Whistleblower who makes a public disclosure, the protective measures provided for in the Whistleblowing Decree will apply.

The Reporting Officer may make a public disclosure if one of the following conditions is met:

- a) the Whistleblower has already made an Internal Report and an External Report, or directly an External Report, and has not received a reply within the deadline;
- b) the reporter has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest;
- c) the Whistleblower has reasonable grounds to believe that the External Report may involve a risk of retaliation or may not be effectively followed up due to the specific circumstances of the case.

- OTHER INTERNAL CHANNELS

Unless expressly stated otherwise, by using the WB Channel, the reporter intends to keep his or her identity confidential and benefit from all the guarantees and protections provided for in the WB Decree.

CR International nevertheless keeps active the additional reporting channels set up in accordance with the different and additional sector regulations⁵ to which reference is made, with reference, inter alia, to the guarantees and protections afforded to the reporter, as well as to the legal requirements set out therein.

SANCTIONS SYSTEM

CR International, in compliance with the applicable regulatory provisions, imposes disciplinary sanctions on those responsible for:

- (i) retaliatory and/or discriminatory conduct, direct and indirect, against the Whistleblower;
- (ii) conduct obstructing or attempting to obstruct the Report;
- (iii) violations of the measures put in place to protect the confidentiality of the reporter;
- (iv) negligent management of reporting channels;
- (v) negligent verification and analysis of Reports received;
- (vi) Unsubstantiated, slanderous or defamatory reports, in the event of criminal liability of the person making the report, ascertained even by a non-final judgment.

Lastly, it should be noted that ANAC has sanctioning powers that give it the power to impose administrative pecuniary sanctions against all persons who are responsible for violations of the WB Decree.

⁵ Reference is made, in particular, to the channels for reporting to CR International's Supervisory Board, established pursuant to Model 231, as well as to the mandatory channels for reporting violations of insurance distribution and anti-money laundering (or AML) regulations.