

# FAQ

## Management of Whistleblowing Reports in Italferr





## WHO CAN REPORT?

Employees, self-employed workers, workers in a collaborative relationship, volunteers and trainees, including unpaid ones, who work at Italferr SpA; workers or collaborators who work at organisations that supply goods or services or carry out work in favour of third parties; freelance professionals and consultants who work at Italferr SpA; shareholders and persons of Italferr SpA with functions in administration, management, control, supervision or representation. Such persons report information on any breaches they have become aware of in the course of their work.

Reporting may be carried out also:

- a) when the legal relationship has not yet begun, if the information on breaches was acquired during the selection process or at other pre-contractual stages;
- b) during the trial period;
- c) once the legal relationship is terminated if the information on breaches was acquired during the course of the relationship.



## WHAT CAN BE REPORTED?

Information on breaches concerning facts (of any nature whatsoever, even if merely omissive), related to persons or third parties of FS Italiane Group, which may constitute :

- 1) breaches of Italferr SpA's Model 231 and of the procedures implementing it and/or of Italferr SpA's Anti-Bribery Policy and Anti Bribery & Corruption management system (hereinafter "ABC system") and/or of the Code of Ethics and/or of the company's internal regulations and/or in any case likely to cause damage or harm to the FS Italiane Group , even if only in terms of image or reputation;
- 2) administrative, accounting, civil or criminal offences;
- 3) unlawful conduct relevant pursuant to Italian Legislative Decree No. 231 of 8 June 2011;
- 4) offences falling within the scope of European Union acts and of the national provisions implementing them;
- 5) acts or omissions affecting the financial interests of the European Union;
- 6) acts or omissions concerning the internal market (by way of example: breaches relating to competition and State aid)
- 7) acts or conduct that frustrate the object or purpose of the provisions of European Union acts.

Reports must relate to facts of which the whistleblower has knowledge, with the whistleblower having reasonable grounds to believe that the information reported is true at the time of reporting.

Reports must be made in a timely manner with respect to the knowledge of the facts so as to make it practically possible to verify them.



## HOW CAN YOU FILE A REPORT?

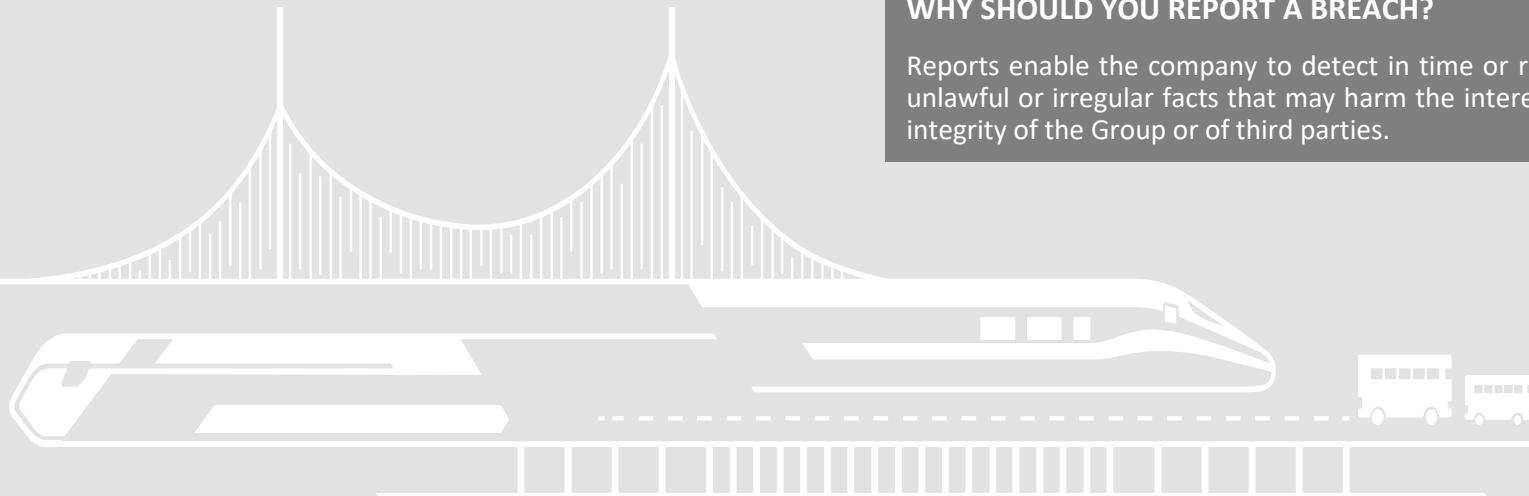
Italferr SpA provides the following reporting channels:

- **IT platform:** accessible from the Italferr SpA website - [www.italferr.it](http://www.italferr.it) - and from the company's intranet. This channel is to be considered preferential as it is more suitable for guaranteeing, by computerised means, the confidentiality of the identity of the reporter and adequate information security measures;
- **ordinary mail:** sent to the address of Italferr SpA, Segreteria Comitato Etico e Segnalazioni and/or Segreteria Organismo di Vigilanza - Via Vito Giuseppe Galati, 71 - 00155 Rome;
- **electronic mail:** to the e-mail addresses [comitato.etico@italferr.it](mailto:comitato.etico@italferr.it) and/or [organismodivigilanza@italferr.it](mailto:organismodivigilanza@italferr.it);
- **phone with Interactive Voice Response:** accessible via the dedicated telephone number for Italferr SpA +39 0682950712, which provides for the recording of the call with the express consent of the Reporting person and alteration of the recorded voice;
- **verbally:** by means of a statement issued by the reporting person, at a hearing set within a reasonable time, to the Italferr SpA Ethics and Reporting Committee/Supervisory Body, recorded in the minutes and signed by the reporting person.



## WHY SHOULD YOU REPORT A BREACH?

Reports enable the company to detect in time or remedy unlawful or irregular facts that may harm the interest and integrity of the Group or of third parties.





### WHAT GUARANTEES DOES ITALFERR SPA PROVIDE IF YOU REPORT?

In compliance with the provisions of the law, Italferr SpA guarantees the confidentiality of the whistleblower's identity from the date of receipt of the report and prohibits (and sanctions, to the extent permitted by its powers and faculties) any direct or indirect form of retaliatory or discriminatory measures or conduct adopted against the whistleblower as a result of the report, including omissive ones, even if attempted or threatened, as well as those addressed to third parties connected to the whistleblower, such as relatives, colleagues, legal entities owned by or working for the whistleblower, who operate in a working context connected to the FS Italiane Group.

The reporting person is informed of the receipt of the report and of the outcome of the related investigation.



### WHAT PROTECTION DOES ITALFERR SPA PROVIDE TO THE PERSON CONCERNED (person referred to in the report)?

Italferr SpA protects the rights of the persons concerned, first of all, in order to guarantee appropriate confidentiality, by ensuring that all communication relating to their identity is made strictly on a "need to know" basis.

The person concerned is informed of the existence and content of the report and receives a copy of it, with the exception of the reference to the identity of the whistleblower, which may not in any case be disclosed to the person concerned, except in cases expressly provided for by law.

The person concerned has the right to be informed of the outcome of the investigation, except in cases expressly provided for in the relevant company procedure.



### CAN YOU REPORT ANONYMOUSLY?

Reports may also be sent in anonymous form.

However, Italferr SpA hopes that the identity of the reporting person, whose confidentiality is guaranteed in accordance with the legislation in force, will be explicitly stated in the reports in order to facilitate the verification of the facts reported and to inform the reporting person of the outcome of the inquiries carried out.



### WHAT DOES ITALFERR SPA DO ONCE IT RECEIVES YOUR REPORT?

The corporate bodies in charge (the Ethics and Reporting Committee and the Supervisory Board) verify the content of the report and carry out investigations on the facts reported in order to verify their veridicity and to enable the adoption of measures to prevent or sanction the irregularities or offences reported.



### HOW IS PROTECTION AGAINST LIBELLOUS OR DEFAMATORY REPORTS GUARANTEED?

Libellous or defamatory reports are prohibited and sanctioned by law and via disciplinary action by the Company.



### HOW ARE PERSONAL DATA PROCESSED?

Personal data are processed in compliance with the applicable regulations. Information on the purposes and methods of processing is available at the Italferr SpA website and on the company's intranet.

