

**Monteverdi s.r.l.**

**Whistleblowing Information Circular - Legislative Decree no. 24 of 10 March 2023**

On 10 March 2023, Legislative Decree No. 24 was adopted, entitled 'Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national laws', which amended the subject matter of whistleblowing, bringing together in a single regulatory text the entire discipline of whistleblowing channels and the protections afforded to whistleblowers, both in the public and private sectors.

For entities in the private sector, the provisions of the decree will take effect from 15 July 2023, with an exception for those who have employed an average of no more than 249 employees in the last year. For the latter, the adjustment deadline is 17 December 2023.

The provisions of Legislative Decree 24/23 are aimed at guaranteeing greater protection for whistleblowers in order to encourage the reporting of violations of national or European laws that affect the integrity of the private entity of which the whistleblower has become aware in the course of the employment or collaboration relationship, regardless of whether the offense in question may give rise to the entity's administrative liability pursuant to Legislative Decree 231/01.

- More specifically, pursuant to Article 2(1) of Legislative Decree 24/23, the following can be reported administrative, accounting, civil or criminal offenses;
- unlawful conduct relevant under Legislative Decree 231/01, or violations of the organisation and management models provided for therein;
- other offenses identified by Article 2(1) of Legislative Decree 24/23.

Pursuant to Article 1(2) of Legislative Decree no. 24/23, on the other hand, disputes, claims or requests linked to a personal interest of the whistleblower or of the person lodging a complaint with the judicial or accounting authorities pertaining exclusively to their individual employment relationships or to their employment relationships with hierarchically superior figures are not to be regarded as breaches and cannot therefore be the subject of a report.

The report may not concern information already in the public domain.

The whistleblower must act in good faith, making detailed reports based on precise and consistent facts. He/she must refrain from making clearly unfounded or unsubstantiated reports.

In order to pursue the objectives imposed by Legislative Decree 24/23, Monteverdi s.r.l. has set up an internal reporting channel that protects - also through the use of encryption tools - the confidentiality of the identity of the person making the report, of the person involved and of the person in any case mentioned in the report, of the content of the report and of the relevant documentation.

This channel is managed by autonomous and specifically trained staff.

Internal reports may be made digitally, either in written or oral form, by connecting to the Factorial platform accessible via the link <https://monteverdituscany.factorial.it/complaints>.

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When it receives a report, Monteverdi s.r.l. sends the reporting party an acknowledgement of receipt and acknowledgement within seven days. Monteverdi s.r.l. will then follow up the report, maintaining contact with the reporting party and requesting any clarifications and supplementary documentation or information that may be necessary. Once it has ascertained that the requirements laid down by the provisions of Legislative Decree no. 24/23 are met, it carries out the investigations it deems appropriate and provides feedback to the reporting person within three months of the date of the acknowledgement of receipt or, in the absence of such notice, within three months of the expiry of the seven-day period from the submission of the report.

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