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Fully Paid-Up Capital: € 2.000.000  
EU VAT no. IT00892451006  
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## TO ALL CHIMEC'S STAFF MEMBERS AND COLLABORATORS

Rome, December 15<sup>th</sup>, 2023

OUR REF:IF/52/23/LAAD

Dear All,

I hereby wish to inform you of the updated implementation of our internal Whistleblowing reporting channel in compliance with Legislative Decree No. 24 of 10 March 2023 (hereinafter the "Whistleblowing Decree"), which implements Directive (EU) 2019/1937 of 23 October 2019, which regulates *"the protection of persons who report violations of national or European Union regulations that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in the context of public or private work"*.

Whistleblowing Decree provides for that CHIMEC shall implement by **December 17<sup>th</sup>, 2023** internal channels (including an IT one) for reporting irregularities within the activity carried out by the Company, on information, duly substantiated, relating to CHIMEC personnel and/or third parties, concerning violations of laws and regulations, the Code of Ethics and the Organisational Model 231 and related procedures adopted by CHIMEC. Such channels shall guarantee, also through the use of cryptography, the protection of the confidentiality of the identity of the Whistleblower, of the Person Involved and/or otherwise mentioned in the Report, the content of the Report and the related documentation.

Enclosed hereto you will find the updated Procedure replacing the communication of 25.09.2018 and is available on Company's website at the following link:

<https://www.chimec.com/whistleblowing/>

and can be consulted in the printed format at CHIMEC's Head Office in Via delle Ande and at CHIMEC's Santa Palomba Plant and Offices.

The Procedure has been drawn up taking into account the provisions of:

- CHIMEC Code of Ethics (hereinafter referred to as the 'Code of Ethics'), in its current version;
- Organization, management and control model adopted by CHIMEC (hereinafter "Model 231") in the current version;
- Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data.

For anything not expressly indicated by this Procedure, the provisions of the Whistleblowing Decree remain fully applicable, ANAC and CONFINDUSTRIA guidelines included.

CHIMEC has been scheduling two online training sessions, lasting 1 hour each, on Whistleblowing in general and on the provisions of the Procedure that shall take place on:

**Monday, 29 January 2024 at 10:30 hrs**

**Monday, 5 February 2024 at 10:30 hrs**

The training sessions will be held by the **LP Studio PARTNER ASSOCIATI**.





In the light of the above, please find here below some instructions relating to the Whistleblowing system and its effectiveness and I hereby invite you to deepen by analysing the enclosed Procedure:

**The recipients of the Procedure are:**

- the top management of the company and the members of the corporate bodies and the SB;
- employees, former employees and applicants for employment, partners, customers of CHIMEC, as well as, by way of example but not limited to, partners, suppliers (including under contract/sub-contract), consultants, employees in the course of their work for CHIMEC who have information about violations as defined in this Procedure.

The provisions of the Procedure also apply to anonymous reports, provided that they are sufficiently substantiated as defined in the Procedure.

Violations that can be reported under the Whistleblowing Decree must relate to conduct, acts or omissions that harm the public interest or the integrity of the public administration or private body (i.e. CHIMEC) of which the Whistleblower has become aware in the course of his or her work for CHIMEC and which consist of:

1. relevant unlawful conduct pursuant to Decree 231 or violations of Model 231;
2. offences falling within the scope of European Union or national legislation (as referred to in the Whistleblowing Decree) relating to the following sectors:
  - a) public procurement;
  - b) financial services, products and markets and prevention of money laundering and terrorist financing;
  - c) product safety and compliance;
  - d) transport safety;
  - e) protection of the environment;
  - f) radiation protection and nuclear safety;
  - g) food and feed safety and animal health and welfare;
  - h) public health;
  - i) consumer protection;
  - j) protection of privacy and protection of personal data and security of networks and information systems;
3. acts or omissions that harm the financial interests of the European Union, as defined in the Whistleblowing Decree;
4. acts or omissions relating to the internal market, including breaches of the European Union's competition and state aid rules, and breaches of the internal market relating to acts that contravene corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax legislation, as referred to in the Whistleblowing Decree;
5. acts or conduct which defeat the object or purpose of the provisions of the acts of the Union in the areas referred to in paragraphs 2, 3 and 4.

**The report must be as detailed as possible and, above all, clear:**

- i. the circumstances of the time and place in which the event covered by the report occurred;
- ii. the description of the event;
- iii. the general information or other elements that allow the subject to be identified in order to attribute the reported facts.

It is possible to attach documents that may provide evidence of the facts that are the subject of the report, as well as the names of other persons who may have knowledge of the facts.

**The following cannot be reported:**

- i. clearly unsubstantiated reports;
- ii. information that is already in the public domain;
- iii. information obtained only on the basis of rumours or unreliable rumours (so-called word on the street);
- iv. disputes, claims or requests relating to a personal interest of the Whistleblower which relate exclusively to their individual employment relationship or are inherent in their employment relationship with hierarchically superior persons;





- v. reports of violations, if they are already mandatorily regulated by European Union or national acts listed in Part II of the Annex to the Whistleblowing Decree, or by national acts that constitute the implementation of European Union acts listed in Part II of the Annex to Directive (EU) 2019/1937, even if not listed in Part II of the Annex to the Whistleblowing Decree. This is the case in the financial services sector, where the European Union has long since extended the value of Whistleblower protection to include the obligation to activate internal and external reporting channels and the explicit prohibition of retaliation;
- vi. reports on breaches of national security and on procurement with defence or national security aspects, unless such aspects are covered by the relevant secondary legislation of the European Union. Therefore, Reports that relate to the contracts provided for in Articles 15 and 24 of Directives 2435 and 2536 of 2014 as well as Article 13 of Directive 2009/8137 and which are also excluded from the scope of the Procurement Code.

CHIMEC has designated a special office, made up of specially trained staff, as the recipient and manager of the reports (hereinafter referred to as the "**Committee**"). The Committee is composed of the following company representatives:

- **Head of Legal Affairs Support Office;**
- **Head of Human Resources Office.**

If a member of the Committee is a **Person Involved in the report**, the Whistleblower may decide to **address the report only to the other members of the Committee, excluding the person involved in the report.**

In accordance with the provisions of the Whistleblowing Decree, CHIMEC has activated the following internal reporting channel which, through a specific online platform adopted by the Company, allows for the submission of written reports in computer mode and guarantees, also through encryption tools, the confidentiality of the identity of the Whistleblower, of the Person Involved and of any person mentioned in the report, as well as the content of the report and the related documentation:

<https://whistleblowing.chimec.com/>

Confidentiality is also guaranteed with regard to the content of the report and its documentation. The protection covers not only the name of the Whistleblower, but also all elements of the report from which the identification of the Whistleblower can be inferred, even indirectly. The identity of the Whistleblower and any information from which it may be inferred, directly or indirectly, shall not be disclosed to anyone other than the Committee, which is responsible for receiving and acting upon reports, without the express consent of the Whistleblower.

The confidentiality of the information is guaranteed at every stage of the report, from the initial intake and preliminary analysis, through the investigation itself, to the final evaluation and archiving of the documentation.

Anonymous Whistleblowing Reporting is permitted.

By registering the report on the aforementioned platform, the Whistleblower will receive a unique identification code (hereinafter referred to as the "**Key Code**"), which must be used to communicate with the Committee in a depersonalised manner and to be kept informed of the processing status of the report submitted.

In this regard, it should be noted that the platform allows the Whistleblower to remain in contact with the Committee during the management of the anonymous report, and to provide clarifications and/or additional documentation through a messaging system that guarantees their anonymity. It should be noted that anonymous reports, without identification of the Whistleblower, will be considered as long as they are sufficiently substantiated and detailed, and as long as they are capable of highlighting facts and situations relating to specific contexts. Anonymous reports are treated by ANAC in the same way as normal reports, without the discipline and protection provided for the Whistleblower. Safeguards apply if the anonymous Whistleblower is subsequently identified and/or subject to Retaliation.

As an alternative to electronic communication via the above-mentioned online computer platform, CHIMEC has set up the following specific communication channels:

- **Email to be sent to:**
  - **odv@chimec.it**, for Significant Reports relating to Decree 231;
  - **comitatowhistleblowing@chimec.it**, for Significant Reports relating to Whistleblowing Decree;
- **Ordinary mail to be sent exclusively to:**
  - CHIMEC S.p.A.  
Via delle Andes 19  
Rome, 00144  
**For the attention of the Whistleblowing Committee – STRICTLY CONFIDENTIAL**



- In oral form, alternatively via telephone lines, with voice messaging systems, also on the online platform, or face-to-face (on request).

At your disposal for any queries you may need, I remain

Yours Sincerely

CHIMEC S.p.A.  
  
Maria Angela Ortolani  
CHAIRPERSON

A circular blue ink stamp. The outer ring contains the text "CHIMEC S.p.A." at the top and "Via delle Ande" at the bottom. The inner part of the stamp is partially obscured by the signature and the text "CHAIRPERSON".

**Annexes:**

1. Whistleblowing Procedure n. 02/23;
2. Whistleblowing Decree;
3. ANAC's Guidelines;
4. CONFINDUSTRIA's Guidelines.