

WHISTLEBLOWING GENERAL INFORMATION

Internal warning channel for Stakeholders

1. Introduction

Our organization is strongly committed to promoting an ethical, transparent and respectful working environment. We believe that every employee and every person interacting with the organization plays a crucial role in maintaining ethical standards and ensuring compliance with laws, company policies and core values. In order that everyone can feel safe to report unethical or illegal behavior without fear of retaliation, we have established specific warning channels that we hope will help maintain our company's ethical standards and integrity. This notice is addressed to all people dealing with Lomopress S.r.l. and are entitled to report any corporate offences they have been directly involved in or they have become aware of. The purpose of this document is to give information in a clear and concise manner about the available warning channels, their operating mechanism, the procedures of feedback and the Company's compliance with the relevant legal provisions. The information for interested people is available on

- the website <https://www.lomopress.com>;
- on company notice boards

2. Internal warning channel

In compliance with legal obligations, Lomopress S.r.l. has activated an internal channel for transmitting and managing reports, which can be made either in written or oral form through these methods:

- SaaS platform "whistlesblow.it, accessible through any browser and at disposal immediately, without any installation or configuration. To use the platform the reporter must access the portal in Italian (<https://whistlesblow.it/c/lomopress-srl/1>) or in English (<https://whistlesblow.it/c/lomopress-srl/2>) and fill in the proposed form.
On the platform the reporter will be guided through each stage of the report and in order to describe the fact in detail she or he will be asked to fill in a series of mandatory fields in compliance with regulatory requirements. After completion it is important that the reporter keeps the code provided by the platform in order to be able to view the progress or update her or his report at a later stage.
- Telephone line/voice messaging system at +39 3387988097;
- Direct meeting with the operators of the internal warning channel

The IT platform is the preferred tool for sending and managing reports, as it is best that can guarantee the confidentiality of the reporter's identity and adequate information security measures thanks to computer means.

Through the platform it is possible to

- send a report
- update a report already sent
- consult the status of a report already sent;
- receive feedback on the follow-up given to the report.

3. Managers of the internal warning channel

The management of the internal warning channel is entrusted to the following person:

- Ing. Sara Tagliaferri

4. Entitled persons

All the persons listed in Article 3 of Legislative Decree no. 24/2023 are entitled to submit reports of corporate offences. By way of example but not limited to, reports may be made by

- Employees of Lomopress S.r.l.;
- Freelancers and consultants who have relations with Lomopress S.r.l

5. Permitted kinds of warning

Any behavior, act or omission that wounds a public or private interest can be reported. As indicated in Article 2 of Legislative Decree No. 24/2023, the following cases are subject to reporting:

- Administrative, accounting, civil or criminal offences;
- Unlawful behaviors included in the Legislative Decree No. 231/2001;
- Offences for which European Union or national acts must be applied;
- Acts or omissions damaging the financial interests of the Union, affecting the internal market or nullifying the object or purpose of the provisions of Union acts.

6. Procedure

The report will be promptly handled by the relevant personnel according to the following procedure:

- Preliminary analysis aimed to verify that the report can be processed;
- Specific in-depth analyses aimed to carry out all the checks, analyses and assessments as to whether the reported facts are well-founded or not;
- Adoption of actions and corrective measures aimed to remove any control weaknesses detected and to launch possible disciplinary proceedings against the person responsible for the reported conduct.

7. External warning channel

The legislation foresees the possibility of a warning by means of the external ANAC channel only in case the following conditions are met:

- The internal channel is not active or does not comply with the legislator's requirements;
- The internal report has not been followed up;
- The person wishing to report has reasonable grounds to believe that if she or he were to make an internal report, it would not be effectively followed up or could lead to a possible retaliation;
- The reporter has reasonable grounds to believe that the breach may constitute an imminent or obvious danger for the public interest.

By clicking on the link to the dedicated page on the ANAC institutional site, you can access to the service dedicated to 'whistleblowing' (<https://www.anticorruzione.it/-/whistleblowing>).

8. Safeguard and responsibility of the warning person

The legislation guarantees the warning person the confidentiality of her or his identity and any other information her or his identity can be directly or indirectly traced from. No retaliation or discrimination may arise against anyone who has made a report in good faith. Sanctions are envisaged for reporters in the event of reports made with malice or gross negligence or that prove to be false, unfounded, defamatory or made with the sole purpose of harming the Company, the indicated person or others concerned by the report.

9. Safeguard of the indicated person

The report is not sufficient to initiate any disciplinary proceedings against the indicated person.

In case it is decided to proceed with the investigation after following concrete findings based on the report, the indicated person may be contacted, thus ensuring the possibility of providing any necessary clarification.

10. Privacy safeguard

Any personal data contained in the report, including those relating to the identity of the reporter or other individuals, will be processed in accordance with the data protection regulations and the GDPR Policy adopted by the Company.

A privacy policy with the purposes and methods of processing is provided.

11. Training and awareness

Reports must be made in a spirit of responsibility, be of interest for the common good, and fall within the types of non-compliances the system has been implemented for.

Please refrain from making reports that do not fall within the above-mentioned cases. Before sending any report, please read the "Whistleblowing Policy - Legislative Decree 24/2023" carefully, as it has been especially prepared for this purpose, where all company procedures are to be found. The Company will continuously promote training and information interventions aimed at understanding the importance of the whistleblowing regulations in order to preserve the integrity of our organization.