

# U4LINE SRL

## Whistleblowing in U4LINE: FAQ

### **Does the Whistleblowing Decree apply to U4LINE S.r.l.?**

Yes, U4LINE, having adopted an Organization, Management, and Control Model, falls within the scope of Legislative Decree 24/2023, which implements Directive (EU) 2019/1937 on Whistleblowing.

### **Who can report a violation?**

Reports under Legislative Decree 24/2023 can be made by all employees, self-employed workers, freelancers, consultants, volunteers, interns, administrators, and supervisory bodies.

However, reports under Article 48 of Legislative Decree 231/2007—concerning the prevention of money laundering and terrorist financing—can only be submitted by employees and individuals in comparable positions, following the procedures adopted by the Sole Shareholder Snaitech.

### **What types of misconduct can be reported by the Whistleblower?**

Any behavior, act, or omission that harms the public interest or the integrity of the public administration or private company, with reference to Legislative Decree 231/2001 and subsequent amendments, as well as the company's Organization, Management, and Control Model.

Whistleblowing regulations do not apply to disputes, claims, or requests related to a purely personal interest of the whistleblower concerning their individual work relationships, even with hierarchically superior figures.

### **Who can be the subject of a report?**

Anyone (both individuals and legal entities).

### **Which channels should be used to make a report?**

The internal digital reporting channel set up by the company, managed by a Whistleblowing Committee that operates autonomously with trained personnel. Alternatively, whistleblowers can request an in-person meeting with the Committee members to submit an oral report.

To ensure maximum confidentiality and effectiveness of the reports, the preferred method is the digital reporting channel. Whistleblowers can access an Operational Manual detailing the steps for submitting a report via the digital platform.

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## **In what form must the report be submitted?**

Reports can be submitted in writing via the digital reporting channel, which allows both the completion of specific forms and the sending of voice messages with voice encryption.

The whistleblower will receive an acknowledgment of receipt within seven days and a response within three months from the Committee handling the report.

Reports can also be submitted verbally through an in-person meeting with the Whistleblowing Committee or one of its members.

## **What protections are provided for whistleblowers?**

- The identity of the whistleblower and any other information that could directly or indirectly reveal their identity cannot be disclosed without the whistleblower's prior consent.
- Any retaliatory action against the whistleblower is considered null and void.
- The National Anti-Corruption Authority (ANAC) maintains a list of Third Sector organizations that provide whistleblowers with support measures such as information, assistance, and free consultations.
- There are liability limitations in case of disclosure of confidential information, protecting copyright and personal data.

## **Are anonymous reports allowed?**

U4LINE, in compliance with Legislative Decree 24/2023 and ANAC Guidelines, allows both named and anonymous reports.

The digital platform enables both reporting methods. However, protections apply only to whistleblowers who disclose their identity (even after the initial interaction), which will still remain strictly confidential.