1. AIM

The aim of this instruction is to describe the procedure to follow when reporting misconduct using the 'My Whistleblowing' software, managed through the 'My Governance' platform available on the company website www.bertanitrasporti.it.

Rev. 0 of 01/24/2022 – First Issue

Rev. 01 of 09.12.2022 – On 9 December 2022, the Council of Ministers approved the legislative decree for the implementation of EU Directive 1937/2019 on whistleblowing, the aim of which is to regulate the protection of whistleblowers within the European Union, through minimum protection standards, aimed at harmonizing national regulations.

Rev. 02 of 03/30/2023 following the entry into force of Legislative Decree no. 24 of 10 March 2023 implementing Directive (EU) 2019/1937 on the protection of persons reporting breaches of Union law and containing provisions on the protection of persons reporting breaches of national legislation.
New external reporting channel planned (National Anti-Corruption Authority – ANAC). – Reporting Register established.

Rev. 03 of 10/09/2025 - My Whistleblowing 2.0 – MY GOVERNANCE Platform _ZUCCHETTI

2. REFERENCE DOCUMENTATION

Organisational, Management and Control Model 231/01;
Code of Ethics;
EU Directive 1937/2019 on whistleblowing;
Legislative Decree 10 March 2023 n. 24
Legislative Decree 196/2003;
GDPR 2016/679 (European Privacy Regulation);
Legislative Decree 101/2018;
P700 Whistleblowing System
P700_M01 Whistleblowing Report Register
Prot. 15 – Legislative Decree 231/01 Whistleblowing

3. APPLICABILITY

This instruction applies to all users better identified as employees and to all collaborators of the company, regardless of the contractual relationship they have with the company (temporary workers, subordinates, seconded workers, project collaborators, agents, interns, consultants, customers, suppliers, etc.) who work with Bertani Trasporti SpA

4. OPERATING PROCEDURES

Reports must be made in good faith, detailed, and based on precise and consistent facts, also to ensure the effectiveness of the available tool. Anyone who maliciously submits reports that are subsequently found to be unfounded may be subject to the disciplinary sanctions provided by law and by the Company's Model 231.

4.1 Report Management

To fully protect the confidentiality of both the whistleblower and the reported individual, the necessary security measures have been adopted: regardless of whether a report is submitted anonymously or not, the confidentiality of the whistleblower's identity is guaranteed through secure protocols and encryption tools that protect the personal data and information provided. The whistleblower's identity will not be disclosed except as required by applicable law.

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4.2 "MY GOVERNANCE" platform

Visit the link https://private.mygovernance.it/mywhistleblowing/bertani-trasporti/32778

My WB 2.0 allows the reporter, depending on the configuration, to choose between two distinct access modes:

• **Access via Token**

The reporter logs the system anonymously via token. Once the report has been submitted, a unique 16-digit code will be randomly generated within the My Governance platform.

The code is stored in a table in where all other fields are encrypted, so it cannot be traced back to any user.

1. Once you have accessed the platform, you can select the language IT/EN (as indicated by the arrow) and then proceed by filling in the fields in sequence, starting from the **"REPORTER'S DATA" area.**

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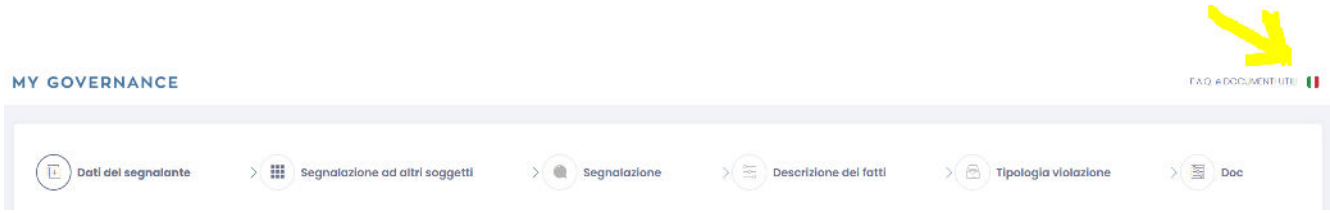
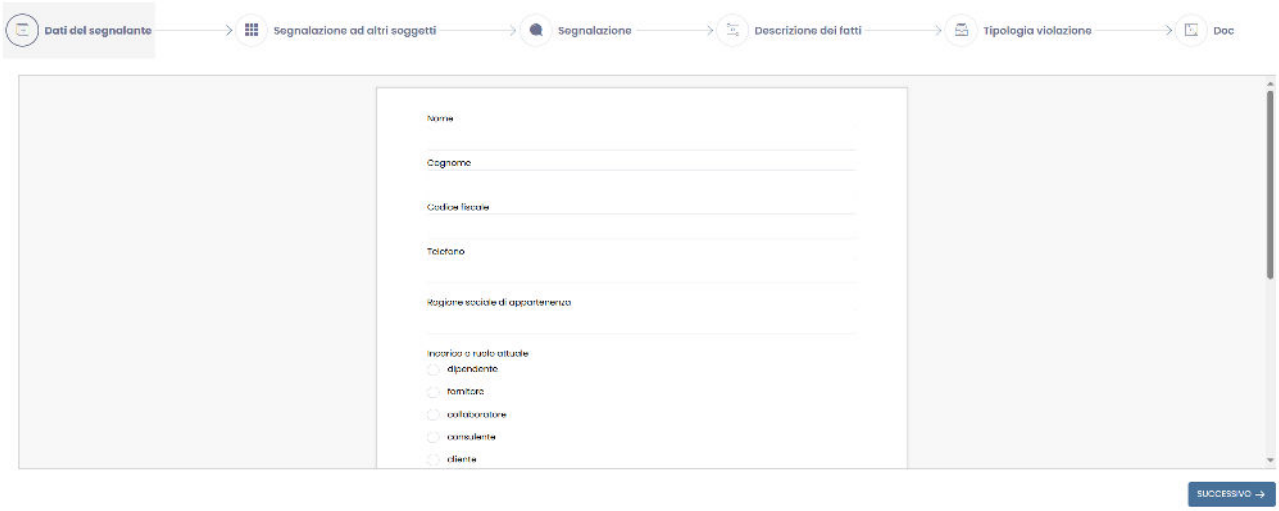


2. **REPORTER'S DETAILS -** At this point, it will be possible to proceed with the report:

a) anonymously : by switching on the **NEXT Tab;**

b) in a non-anonymous form by filling in the appropriate fields



3. **REPORTING TO OTHER PARTIES** : you will be asked whether the report has already been made to others or not (e.g., your direct manager in the case of an employee, a senior person in a company, or third parties such as a Public Authority, etc.).

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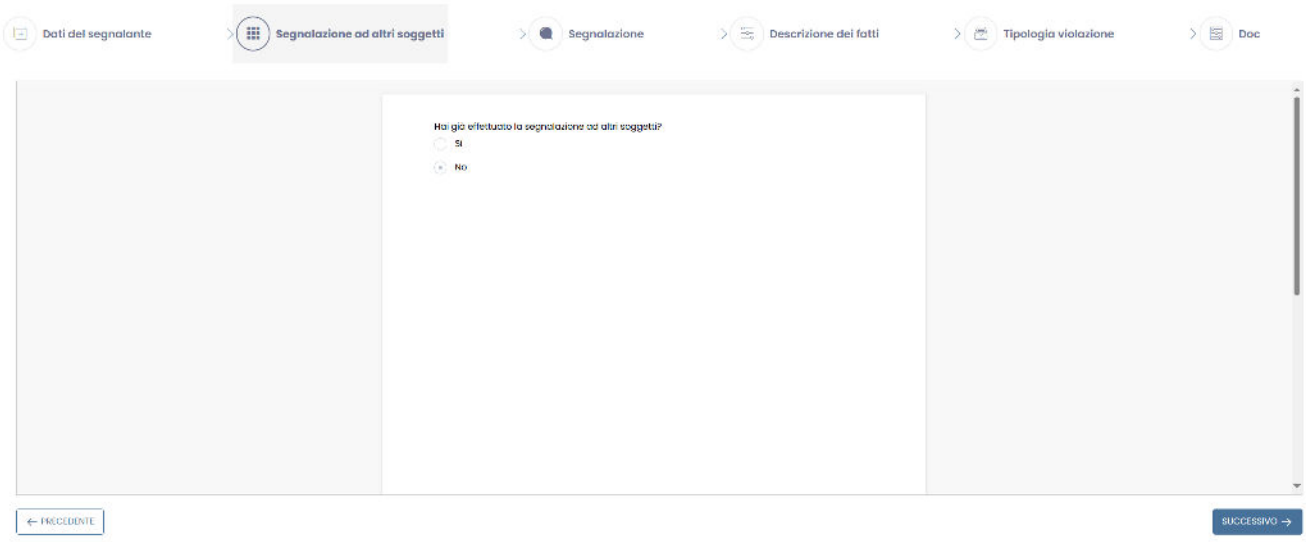
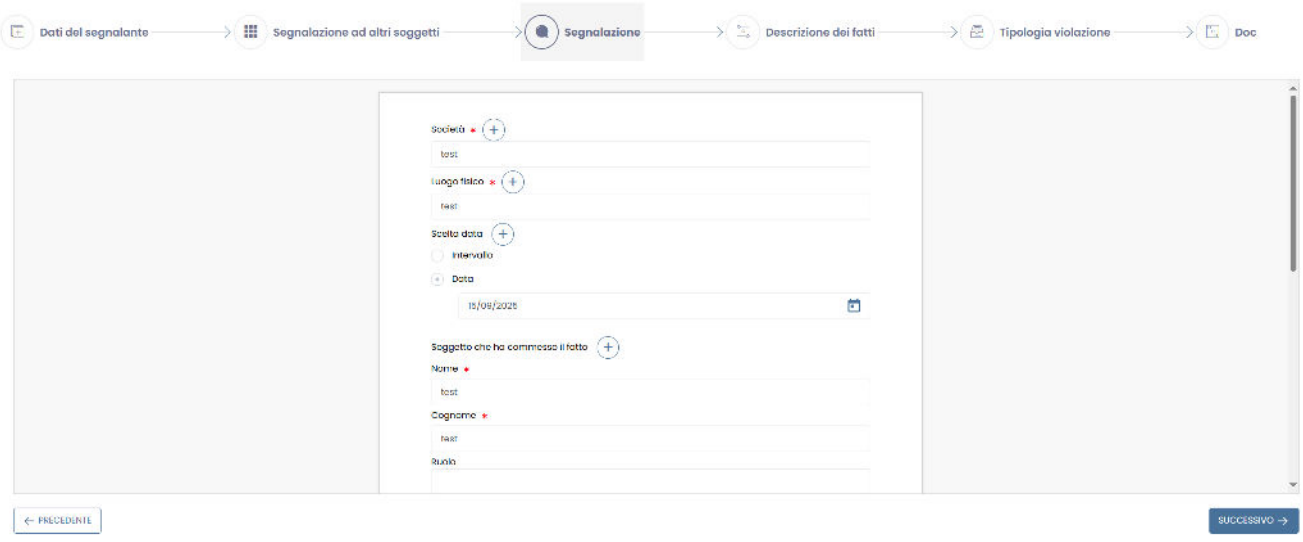


4. **REPORT:** Further requests for information will follow in order to substantiate the report (Company/Entity where the incident occurred, date and place, individual who committed the incident, and Area to which the violation refers).



5. **DESCRIPTION OF THE FACTS:** You must enter a description of the facts using at least 30 characters.

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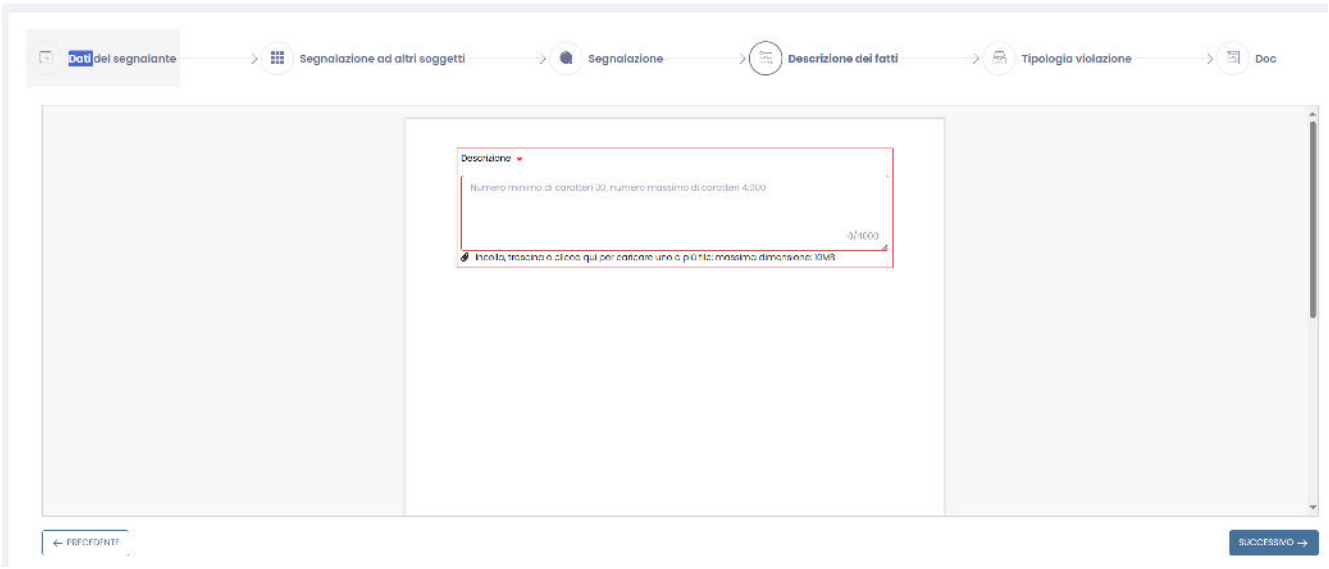
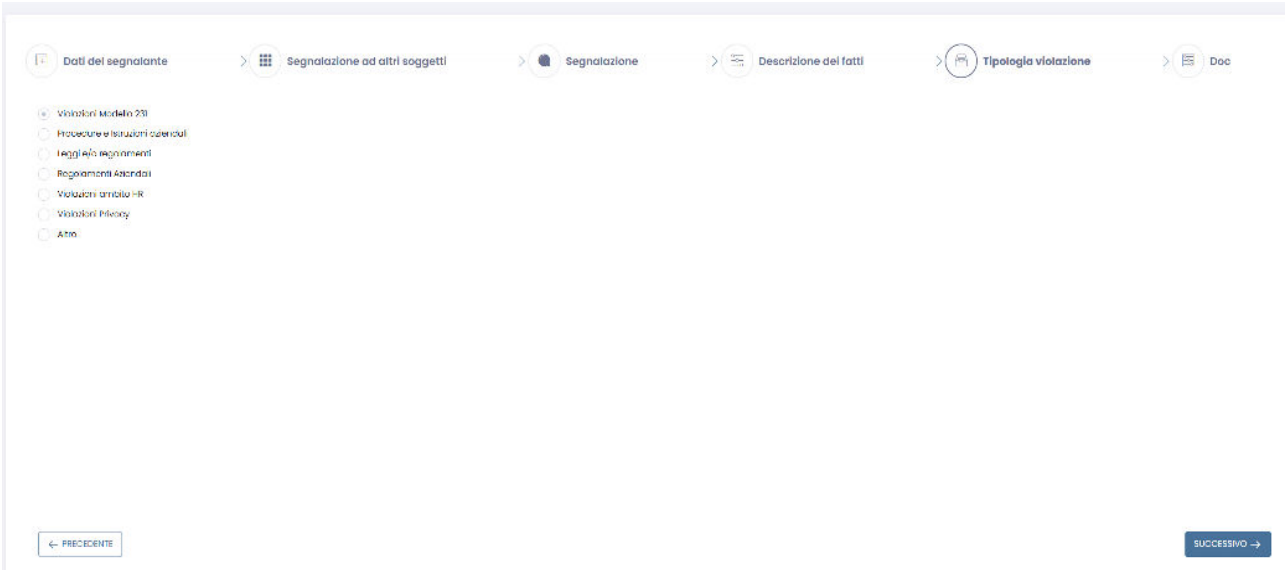


6. **TYPE OF VIOLATION:** You must then report the type of violation, if known:



7. **DOC** : The whistleblower may then attach documents to support their report. Finally, check the boxes below after reading the Company Privacy Policy, available via the hyperlink:

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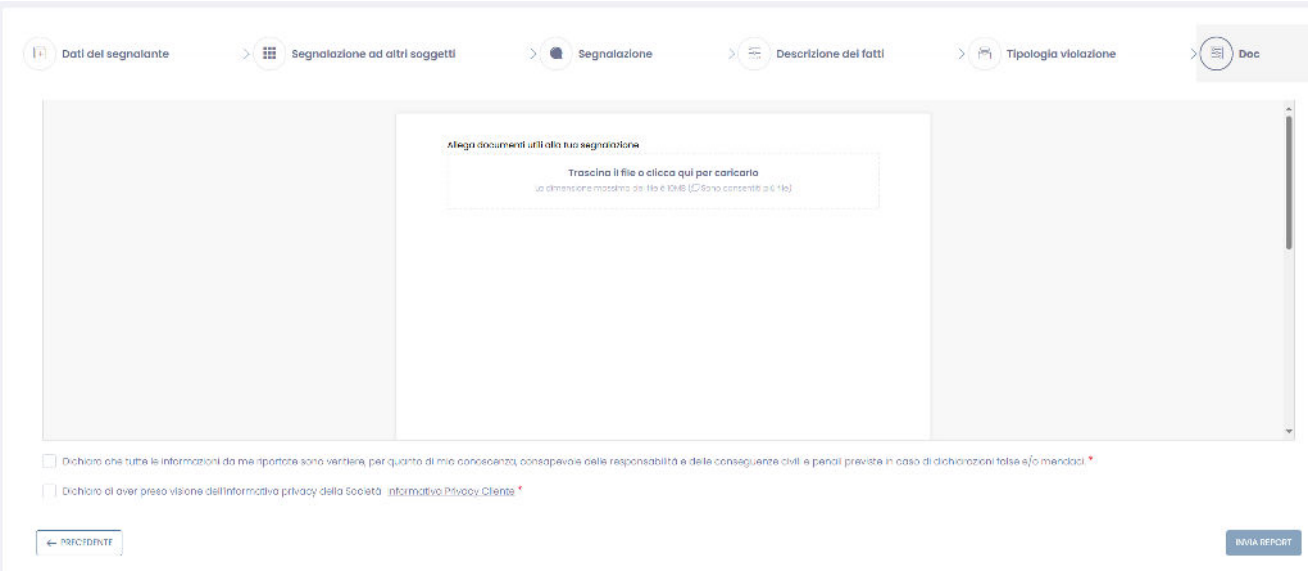

8. You can check the status of your report at any time by logging into the platform with your credentials. For further information, please contact the SGI Team by email at sgi@bertanitrasporti.it .

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