		<b>INSTRUCTION</b> <b>Whistleblowing Management System</b> <b>"MY GOVERNANCE" platform</b>		
<i>Code</i>	<i>Editorial board</i>	<i>Verify</i>	<i>Approval</i>	Rev. 02 – 30.03.2023
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## 1. SCOPE

The purpose of this instruction is to describe the procedure to be followed to report an offense using the "My Whistleblowing" software, managed via the "My Governance" platform available on the company website [www.bertanitrasporti.it](http://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 transposition of EU Directive 1937/2019 on whistleblowing, the purpose of which is to regulate the protection of whistleblowers within the European Union, through minimum standards of protection, aimed at standardizing national regulations.

**Rev. 02 of 03.30.2023** following the entry into force of Legislative Decree 10 March 2023 n. 24 implementing Directive (EU) 2019/1937 concerning the protection of persons who report violations of EU law and laying down provisions concerning the protection of persons who report violations of national regulatory provisions. New external reporting channel planned (National Anti-Corruption Authority - ANAC). - Register of Reports established.

## 2. REFERENCE DOCUMENTATION

Model of Organisation, Management and Control 231/01;  
 Ethical code;  
 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 Register of Whistleblowing Reports  
 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 with the same (temporary, subordinate, seconded workers, project collaborators, agents, interns, consultants, customers, suppliers, etc.) who find themselves working with Bertani Trasporti SpA

## 4. OPERATING MODES

Reports must be made in good faith, detailed and based on precise and concordant factual elements, also in order not to waste the effectiveness of the tool made available. Anyone who fraudulently makes reports that subsequently turn out to be unfounded may be subject to the disciplinary sanctions provided for by the Law and by the Company Model 231.


### 4.1 Report Management

To fully protect the confidentiality of the "reporter" and that of the "reported" subject, the necessary security measures have been adopted: regardless of the choice of making a report anonymous or not, the confidentiality of the identity of the reporter is guaranteed through secure protocols and encryption tools that help protect your personal data and the information you provide. The identity of the whistleblower will not be disclosed except in the cases provided for by current legislation.

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#### 4.2 "MY GOVERNANCE" Platform – Activation and Management of Reports with personal/company email

1. Connect to the link <https://areariservata.mygovernance.it/#!/WB/bertani-trasporti> and proceed to create the user by entering his name, surname and e-mail address (possibly NOT COMPANY). After registering, you will receive an e-mail containing an identity confirmation link which authorizes entry to the platform and you will be automatically redirected to the login screen. The same e-mail contains the credentials whose password must be changed on first access following the complexity criteria described therein.




**MY GOVERNANCE**

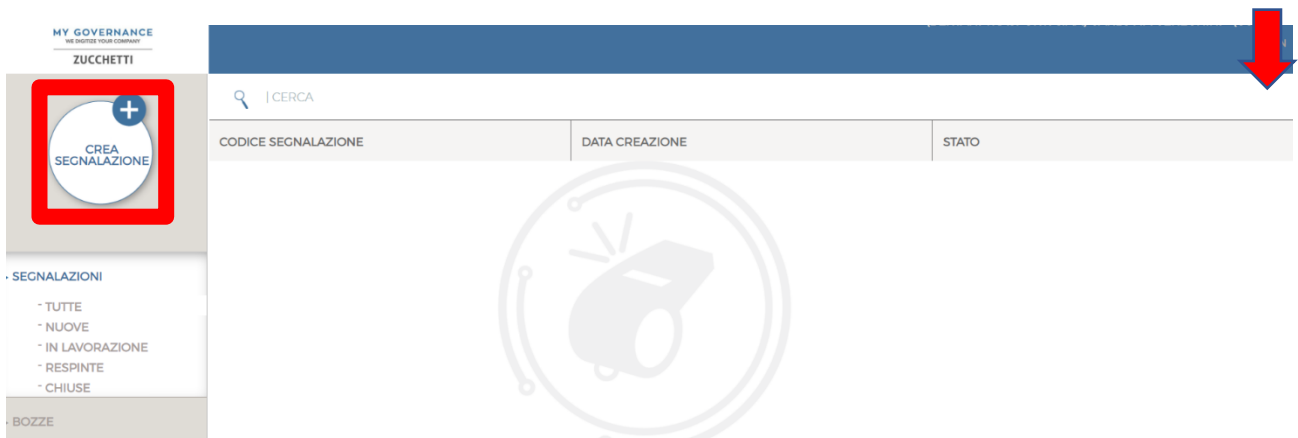
[PASSWORD DIMENTICATA? FORGOT PASSWORD?](#)  
[CLICCA PER RESETTARE / CLICK HERE TO RESET](#)

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I'm not a robot
 

  
reCAPTCHA  
Privacy - Terms

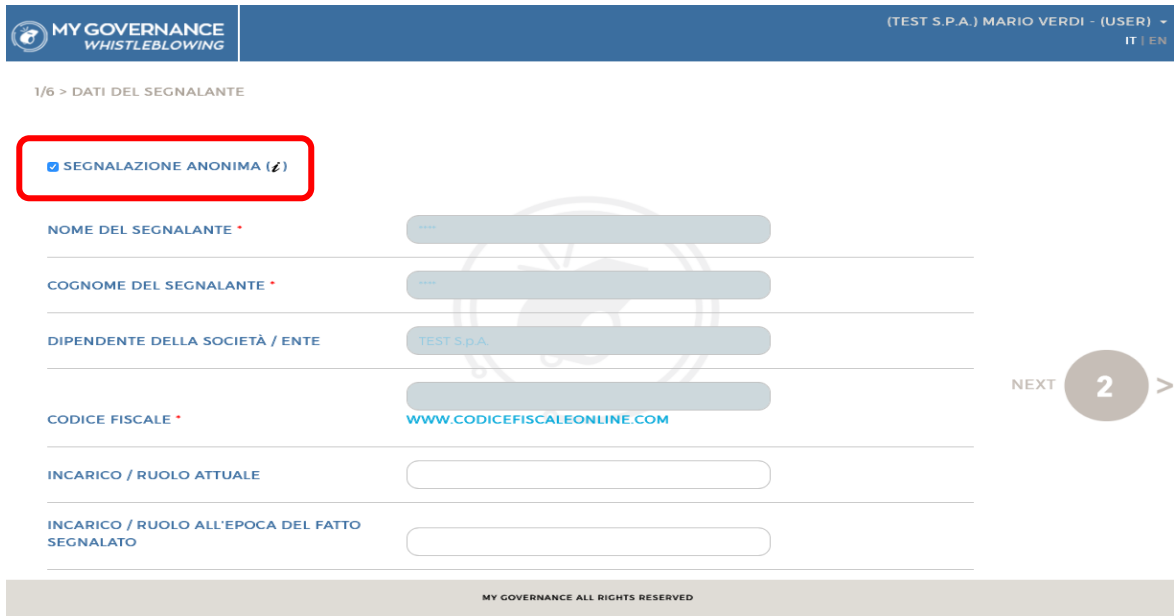
2. Once you have entered the platform, you can choose the IT/EN language (as indicated by the arrow) and then select "CREATE REPORT" to proceed (as shown in the image below).



3. At this point, it will be possible to proceed with the report:

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- a) **anonymously using the appropriate option (as in the image highlighted in red):**  
 b) or, **in non-anonymous form** by filling in the appropriate spaces (as shown in the image above) but in any case with the



1/6 > DATI DEL SEGNALANTE

SEGNALAZIONE ANONIMA (ℓ)

NOME DEL SEGNALANTE \*

COGNOME DEL SEGNALANTE \*

DIPENDENTE DELLA SOCIETÀ / ENTE

CODICE FISCALE \*

INCARICO / RUOLO ATTUALE

INCARICO / RUOLO ALL'EPOCA DEL FATTO SEGNALATO

NEXT **2** >

MY GOVERNANCE ALL RIGHTS RESERVED

guarantees of confidentiality established by law. The fields marked with the symbol "\*" are mandatory. Some fields are open and must have a minimum number of characters.

4. As a first question, 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 the company, or third parties such as Public Authorities, etc.). If not, the motivation will still be requested

LA SEGNALAZIONE È GIÀ STATA EFFETTUATA AD ALTRI SOGGETTI? \*  SI  NO

PER QUALI MOTIVI LA SEGNALAZIONE NON È STATA RIVOLTA AD ALTRI SOGGETTI?

5. Further requests for information necessary to substantiate the report will follow (Company/Body in which the fact occurred, date and place, person who committed the fact and Area to which the violation refers).

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2 PREV

SOCIETÀ / ENTE IN CUI SI È VERIFICATO IL FATTO \*

DATA IN CUI SI È VERIFICATO IL FATTO \*

PERIODO SINGOLO EVENTO

LUOGO FISICO IN CUI SI È VERIFICATO IL FATTO \*

SOGGETTO CHE HA COMMESSO IL FATTO \*

NOME COGNOME RUOLO

A QUALE DIPARTIMENTO SI RIFERISCE LA VIOLAZIONE? \*

<input type="checkbox"/> AMMINISTRAZIONE/FINANZIARIO	<input type="checkbox"/> AREA UFFICIO DANNI	<input type="checkbox"/> COMMERCIALE
<input type="checkbox"/> OPERATIVO TRASPORTI	<input type="checkbox"/> DIREZIONE GENERALE	<input type="checkbox"/> ACQUISTI/SGI
<input type="checkbox"/> IT	<input type="checkbox"/> PRODUZIONE/MAGAZZINI	<input type="checkbox"/> RISORSE UMANE
<input type="checkbox"/> ALTRO		


NEXT 4

6. You must enter a description of the facts by entering at least 50 characters

DESCRIZIONE DEI FATTI \*

LA DESCRIZIONE DEVE ESSERE DI ALMENO 50 CARATTERI E MASSIMO 4000

Empty text area for describing the facts.

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7. Therefore it will be necessary to report, where known, the type of violation

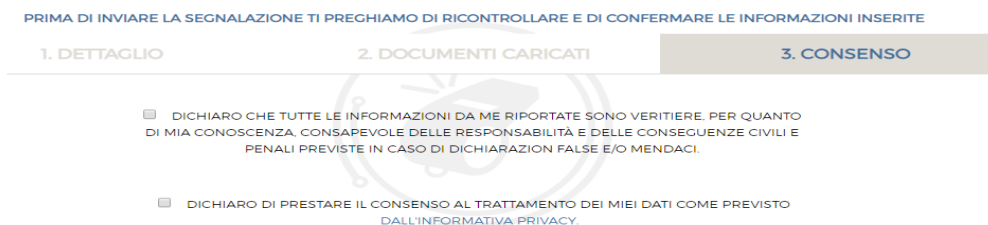


8. The whistleblower can then attach documents in support of his report:



9. Once the summary screen of the report has been reviewed, the whistleblower can proceed to send it, giving consent to the Privacy information, available in the attachment.

## RIEPILOGO



10. At any time it is possible to check the status of the report by accessing the platform with your credentials. For clarifications, contact the SGI Team also by e-mail [sgi@bertanitrasporti.it](mailto:sgi@bertanitrasporti.it).