

WHISTLEBLOWING – NEWS AND USEFUL INFORMATION

Which channel can you use?

ONLINE PLATFORM accessible via a dedicated link published at <https://www.villaserbelloni.com/en/whistleblowing.html>

The report may be made either in writing or by voice recording.

What should a Report look like? What can be reported?

You have to act in good faith reporting information, according to the interests of **Grand Hotel Villa Serbelloni**, in a spirit of responsibility and you have to provide specific information.



What can I report according to the standard

Conduct, acts or omissions that harm to the public interest or the integrity of the public administration or the private entity and consisting of:

- ✓ administrative, accounting, civil or criminal violations;
- ✓ unlawful conduct relevant under Legislative Decree 231/2001, or violations of the organisation and management models provided for therein;
- ✓ Unlawful acts that fall within the scope of European Union or national acts relating to the following areas:
 - public procurement;
 - financial services, products and markets and the prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - transport safety;
 - protection of the environment;
 - radiation protection and nuclear safety;
 - food and feed safety and animal health and welfare;
 - public health;
 - consumer protection;
 - Data protection and security of networks and information systems;
- ✓ acts or omissions affecting the financial interests of the Union;
- ✓ acts or omissions relating to the internal market;
- ✓ acts or conduct that defeat the object or purpose of the provisions of Union acts.



What I CANNOT report (sample list)

The following do not qualify as Whistleblowing Reports

- **personal grievances** of the reporter;
- **claims pertaining to the employment** or collaboration **relationship**;
- **claims** pertaining to relations **with hierarchical superiors** or colleagues.

IMPORTANT: If the reporter uses the platform to commit offences such as slander, insult or damage to a computer system, he/she will incur the consequences provided for by law.

How is the Report handled?

Reports will be received and handled by an independent company with specific trained staff, external to the **Grand Hotel Villa Serbelloni**.

The special regime of safeguards and protective measures set out in Legislative Decree No. 24/2023 of the Italian law is ensured.

The Recipient will check the validity of the report so that **Grand Hotel Villa Serbelloni** can take the most appropriate consequential measures.

Anonymity and Confidentiality

Reports may be anonymous, but even if they are not, confidentiality is still guaranteed by the standard, the technical tool and the preparation of the managers.

The privacy policy of personal data about the Whistleblowing processing is available on the website and on the platform prior to the collection of the Report information.

Please note: anonymous reports may lead to greater difficulties for **Grand Hotel Villa Serbelloni** to investigate.










External reports, public disclosures and reporting to Judicial Authorities

The breach may be reported to the ANAC, through the external channel activated by it, or disclosed publicly, when, alternatively:

- an internal reporting channel has not been established or when the same, even if provided for, is not available;
- the internal and/or external report, already made, has not been followed up;
- the reporter has reasonable grounds to believe that, by using the internal and/or external channel, the report would not be effectively followed up;
- the reporter has a well-founded fear of retaliations;
- the breach may constitute imminent or obvious danger to the public interest.

The Law also recognises the possibility for protected persons to turn to the judicial authorities, to lodge a complaint of unlawful conduct of which they have become aware in a private employment context.

**HOW TO MAKE A WHISTLEBLOWING REPORT
VIA THE PLATFORM AND WHAT TO EXPECT**

	<p>To make a report connect to the "Platform" and follow the on-screen instructions.</p>
	<p>Click on the "send a report" button and fill in the required fields marked with (*). The whistleblower is also entitled to fill in the other non-mandatory fields that also provide information on the identity of the whistleblower. In any case, remember that the report must be substantiated by indicating:</p> <ol style="list-style-type: none"> 1. The circumstances of time and place in which the event that is the subject of the report occurred 2. The description of the fact (even in the presence of evidence or with the possibility of attaching documents) 3. The elements that make it possible to identify the person to whom the reported facts are attributed <p>The user will be able to enrich the information provided by attaching files and audio to the report.</p>
	<p>The platform will optionally ask for consent to detect the identity (if provided) from persons other than those competent to receive and manage the reports.</p>
	<p>When you are sure of the content to be forwarded / in written or vocal form, proceed to send. You can listen to the recording again. The voice is automatically mystified by the platform. If you are not satisfied, you can repeat it by altering the tone of voice in addition to the automatic tone of the software.</p>
	<p>At this point, the platform will issue the unique alphanumeric code (ticket code) that must be noted, kept and not disclosed to third parties. <u>It will be the only way through which you will be able to access this report again to monitor its progress</u> and the manager's responses, by clicking on "have you already made a report? Enter the receipt on the home screen (whether you have made an anonymous report or revealed your identity).</p>
	<p>Once the report has been made, the Whistleblower will receive acknowledgment of receipt or notification, directly visible on the platform. With this notice, the deadline for notification of receipt of the report is deemed to have been fulfilled.</p>
	<p>The outcome of the report will be received within three months (except in special cases) from the acknowledgment of receipt or notification.</p>
	<p>Reports can also be sent anonymously through the platform.</p>
	<p>The data and information on the platform are stored within the platform and kept for a period of 5 years.</p>