

FAQ Whistleblowing

Why registration?

- To further strengthen the system of access to the report by the Whistleblower;
- For full traceability regarding the taking over and management of the report over time, as well as to facilitate dialogue between the Whistleblowing Team and the Whistleblower;
- For greater speed and effectiveness of investigations.

What protections are provided for the Reported Person?

The confidentiality guarantees established by the Procedure also protect the Reported Person. The Reported Person will not be subject to disciplinary sanctions in the absence of objective evidence regarding the Reported violation, or without the facts being reported being investigated and the related charges being contested using legal and/or contractual procedures. To further protect the Reported Person, the actions and powers permitted by law remain unaffected.

Are there any protections for the Whistleblower from retaliation or discrimination?

In compliance with the law, Telepass prohibits and sanctions any form of retaliation or discrimination against anyone who has made a report (as well as anyone who has collaborated in ascertaining the facts reported), regardless of whether the report is later proven to be founded or not. In particular, if the Whistleblower in good faith is an Employee, the Whistleblowing Team (making use of the competent company functions) will monitor the progress of the Employee's working life for a period of 2 years from the date of the report, to prove the absence of discriminatory or other forms of retaliation following the reporting itself.

How will the report be closed?

The Whistleblowing Team proceeds to close the report, after verifying its validity and activating any appropriate actions.

What happens after sending a report?

The Whistleblowing Team takes charge of the report sent and carries out the appropriate assessments both in terms of completeness and relevance of the request and to start the investigation useful to initiate any actions and/or interventions.

What should you do if you feel it is appropriate to make a report?

Through one of the channels offered by Telepass, the Whistleblower can send a report, in nominative form (i.e. report containing the name of the whistleblower) or not, which contains clear, precise and detailed information where possible.

Who can send a report?

Any person internal and external to the Telepass Group (top management, members of the corporate bodies, employees, third parties - e.g. customers, suppliers and consultants) who has become aware of information regarding the above topics.

When is it appropriate to send a report?

If you notice behaviors and/or facts that are believed to be illicit conduct or irregularities, violations of laws, procedures, 231 Models and any behavior that violates the values of integrity, honesty and respect for people.