

# DO YOU HAVE SOMETHING TO REPORT?

*You are the best defense for Tenova's integrity against compliance violations*

**The Whistleblowing process ensures the receipt, analysis and management of reports of any misconduct or violation of internal or external regulations, in order to promote and grant a culture of transparency and integrity based on ethical behavior and compliance with the law.**

## **WHO can report**

Anybody can report: Tenova personnel, clients, suppliers and other external parties. Tenova allows anonymous whistleblowing reports.

## **WHAT to report**

Conducts by corporate bodies / employees / external collaborators that are illegal, allegedly illegal, in breach of the Code of Conduct, Transparency Guidelines, Anti-Bribery Policy and all internal and external applicable laws and regulations to Tenova Group.

Key information to include in the report:

- **object:** clear description of the facts with the indication, if known, of the related time and place;
- **reported subject** (i.e. the person who is suspected of misconduct or violation of internal or external regulations) **and other involved subjects**, or any element that can favor the identification of the alleged author of the (suspected) unlawful conduct (e.g. job role/title).

The whistleblower can also include documents and further information that may facilitate the collection of evidence on the reported facts.

## **HOW to report**

✉ **E-mail address:** [audit@tenova.com](mailto:audit@tenova.com) and/or [compliance@tenova.com](mailto:compliance@tenova.com)

📁 **Internal mail**, the envelope should state "To the attention of Internal Audit Department - Strictly Confidential" and/or "To the attention of Compliance Department – Strictly Confidential".

✉ **External mail**, the envelope should state "To the attention of Tenova Internal Audit Department" and/or "To the attention of Compliance Department" should be sent at the following address: Tenova S.p.A., Via Gerenzano 58 – 21053 Castellanza (VA), Italy.

## **Improper reports**

Whistleblowing reports **should not contain** insulting tones or personal offenses aimed at harming the honor and/or personal or professional decorum of the persons involved (e.g. defamatory of slanderous purposes only). In particular, whistleblowing reports are prohibited if:

- exclusively related to aspects of private life, without direct or indirect links with the professional activity of the involved persons and without any potential impact on the image/reputation of Tenova;
- containing discriminatory elements related to sexual, religious or political orientation, or to the racial or ethnic origin of the reported subject.

In case of a whistleblowing report containing such elements, the confidentiality of the whistleblower's identity, as well as other measures in place for the protection of the whistleblower, may not be guaranteed.

## **Protection and confidentiality**

- **Protection of the whistleblower** – Tenova protects the whistleblower by ensuring the confidentiality of his/her identity and expressly prohibiting retaliatory, discriminatory or otherwise unfair conduct directly or indirectly related to the whistleblowing report. Whistleblowers in good faith can't be sanctioned, but whistleblowers in bad faith will be sanctioned.
- **Confidentiality** – Tenova ensures the utmost confidentiality of the report (including any document and information received or collected) and of both the whistleblower and the reported subjects; therefore, the information provided in the report shall not be communicated or divulged to people not directly involved in the evaluation and verification activities. The confidentiality of the whistleblower's identity may not be guaranteed if the whistleblower gave written consent to revealing his/her identity; if there is the necessity for the reported subjects to exercise its rights of defense; and/or if the identity of the whistleblower is required by the competent authorities in connection with their investigations.
- **Data protection** – Personal data of all those involved in the whistleblowing report will be processed in compliance with applicable laws and regulations on privacy and data protection.

## **Tenova's whistleblowing management**

Tenova's Internal Audit Department or Compliance Department take charge of the whistleblowing report and carry out a preliminary analysis of the report received in order to classify it (relevant and treatable / not relevant / not treatable / improper), give a feedback to the whistleblower, and identify the subjects to investigate. Investigations will be carried out in order to collect further detailed information, verify the validity of the reported facts and take the most appropriate measures. Tenova can ask the whistleblower for further information or documents.