

## WHISTLEBLOWING

In order to contribute to identifying and combating possible unlawful/irregular conduct and to spread a culture of ethics and legality within the Company organization, Rai Way has adopted specific whistleblowing channels.

Reports may be made by those working within the Company, as well as by collaborators, customers, advisors, partners and suppliers of work, goods and services and their respective employees and collaborators.

Reports may concern:

- alleged breaches of the Code of Ethics, of the Model pursuant to Italian Legislative Decree 231/2001 or of the Company's Anti-Corruption Policy;
- alleged breaches of other internal provisions or rules of laws and regulations applicable to the Company or of measures of Public Authorities;
- alleged unlawful, fraudulent or irregular conduct, regarding the Company's area of business and/or relations with the Company;
- alleged conduct that causes damage to the Company's financial position or image.

Reports must contain details enabling those responsible to conduct appropriate checks and inspections to establish the merits of the reported facts. More specifically, Reports must contain the following information:

- the Whistleblower's personal details, position and role at present and at the time of the facts reported in Rai Way or in connection with relations with it, and his/her contact details, unless the right to anonymity is exercised, as specified in greater detail below;
- description of the facts concerned by the Report, with specification of the time and place the reported facts were committed, insofar as known;
- if known, the personal details or other information, such as the position or sector where they work/worked at the time of the facts, enabling the identification of the Reported Person/s;
- specification, insofar as known, of any other persons who could provide an account of the facts concerned by the Report;
- any documents, insofar as known, that could confirm the merits of the facts set out in the Report and any other information that could corroborate the existence of the reported facts or even facilitate the collection of evidence;
- specification of the existence of an interest associated with the Report.

Anonymous Reports<sup>1</sup> are taken into consideration when they are found to contain circumstantiated and consistent factual details that provide the recipient with the fullest possible information on the facts or conduct concerned by the Report.

Reports must be submitted in good faith and in particular they must not contain affronts, personal insults or moral judgments intended to offend or to slight the honor and/or personal and/or professional integrity of the Reported Person/s and cannot be submitted in breach of the law.

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<sup>1</sup> Referred to, within the context of the reserved computer platform made available by the Company, as "Reporting without registration".



Furthermore, complaints concerning business activities (e.g. complaints about inefficiencies, etc.) or relating to purely personal concerns of the Whistleblower shall not be regarded as Reports.

Reports may be forwarded by:

- reserved computer platform made available at <https://raiway.segnalazioni.net/> (preferred channel);
- email to the address: [segnalazioni@raiway.it](mailto:segnalazioni@raiway.it);
- regular mail to the Company's registered office (Via Teulada 66, 00195 Rome), in a sealed envelope enclosed within a second sealed envelope, to the strictly confidential attention of the Head of the Audit Department<sup>2</sup>.

The Report shall firstly be brought to the attention of the Company's Audit Department and then, through it, to the Supervisory Body, the Anti-Corruption Officer, operating in coordination with the Supervisory Body, and the Standing Committee for the Code of Ethics for aspects within their remit and to enable their inspections.

The report is registered confidentially in a special register and then analyzed to ascertain whether the conditions for admissibility are met. In case of ineligibility, the report is archived. Otherwise, an in-depth investigation of the facts contained in the Report is carried out, with the aim of ascertaining the grounds for the Report, and, if necessary, initiating communication with the Reporting Subject in order to receive further information, documentation and evidence as necessary.

At the end of the investigation, the Report is closed and archived or, if it is deemed to be well-founded, the outcome of the investigation is communicated to the competent Human Resources department for the assessment of possible disciplinary and/or organizational measures to be applied, making a related proposal to the Chief Executive Officer.

All the documentation pertaining to the Report and any relative preliminary investigation shall be conserved, by means of the maintenance of a computer and/or paper archive, in such a way as to ensure the tracking of the activities carried out and by adopting appropriate levels of security/confidentiality, such as to guarantee that there is no access to the information and documents by third parties inside or outside Rai Way. Documentation and Reports shall be kept for a period of time no longer than is necessary for the purposes for which the data were collected and subsequently processed, and in any case in compliance with current legislation on the protection of personal data.

Management principles and rules have been established, as have disciplinary measures in the event of breach, which serve to ensure the confidentiality of the Whistleblower's identity. More specifically, in order to protect the Whistleblower and to comply with the principle of confidentiality, the recipients of Reports and all Rai Way employees who receive a Report and/or are involved in any capacity in investigating and dealing with Reports, are generally required to ensure the strictest confidentiality with regard to the Whistleblower and the subject of the Report and for this purpose to use suitable communication criteria and procedures to protect the identity and integrity of those mentioned in Reports, and to avoid communicating data obtained to persons not involved in the investigation and

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<sup>2</sup> In the event that the Subject of the Report is the Head of the Audit Department, the submission may be forwarded, other than by the reserved computer platform:

- by post, in a double sealed envelope, to the Company's registered office, addressed to the strictly confidential attention of the President of the Vigilance Organism of Rai Way S.p.A; or
- by email to the address "presidenteodv@raiway.it".



handling of the Reports governed by this Procedure, without prejudice to legal obligations or responsibilities or to investigative requirements for defence purposes.

Whistleblowers must also be protected against any form of retaliation or discrimination as a result of the Report. More specifically, retaliatory or discriminatory dismissals, changes in duties and any other retaliatory or discriminatory measures taken against the Whistleblower for reasons directly or indirectly associated with the Report shall be null and void, even if the reported facts should prove unfounded and/or inconsistent, on the basis of the assessments and investigations conducted, with regard to Whistleblowers who made the Reports in good faith.