

NE NOOTER/ERIKSEN S.r.l

WHISTLEBLOWING POLICY

MODEL TIONS

I Edition Novembre2020

Approved by the Board of Directors 30th Novembre2020

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WHISTLEBLOWING POLICY		

By mail to the address of the company's operational headquarters in Cardano Al Campo (VA)

Volta n. 50 sent to the attention of the Supervisory Body or the Human Resources Manager;

Via the whistleblowing platform, by accessing the internet page or at the following link:

<https://nesrl.segnalazioni.biz/>

Please also note that

WHISTLEBLOWING POLICY

Contact the reporter (if the report has not been made anonymously) and invite him/her to take part in a confidential meeting to request clarifications and/or further information and documents in addition to those initially provided; and

Carry out interviews with any other parties who may be in a position to report on the facts reported; and

Carry out any other activity deemed appropriate for the purposes of investigating the report.

The recipients may involve other Company departments and/or appoint external consultants if necessary for the purposes of their investigations. The members of the working group involved in the investigation of the report are subject to the same confidentiality constraints and responsibilities as the report recipients. All these individuals are also obliged to refrain from dealing with the reporter in the case of any potential conflicts of interest.

The recipients of the report shall draw up and keep the minutes of any meetings relating to investigations carried out independently and with the assistance of the company departments involved.

If the report is relevant for the purposes of Legislative Decree no. 231/2001 because it involves a violation of the Code of Ethics and/or the Code of Conduct (D.Lgs. n. 231/2001) (art. 1, paragraph 1, letter a), the report shall be forwarded to the Internal Control Unit (ICU) (D.Lgs. n. 231/2001) (art. 1, paragraph 1, letter b).

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The recipients possibly in agreement with the Supervisory Body if the fact is relevant to the 231 Legislative Decree shall also take any

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