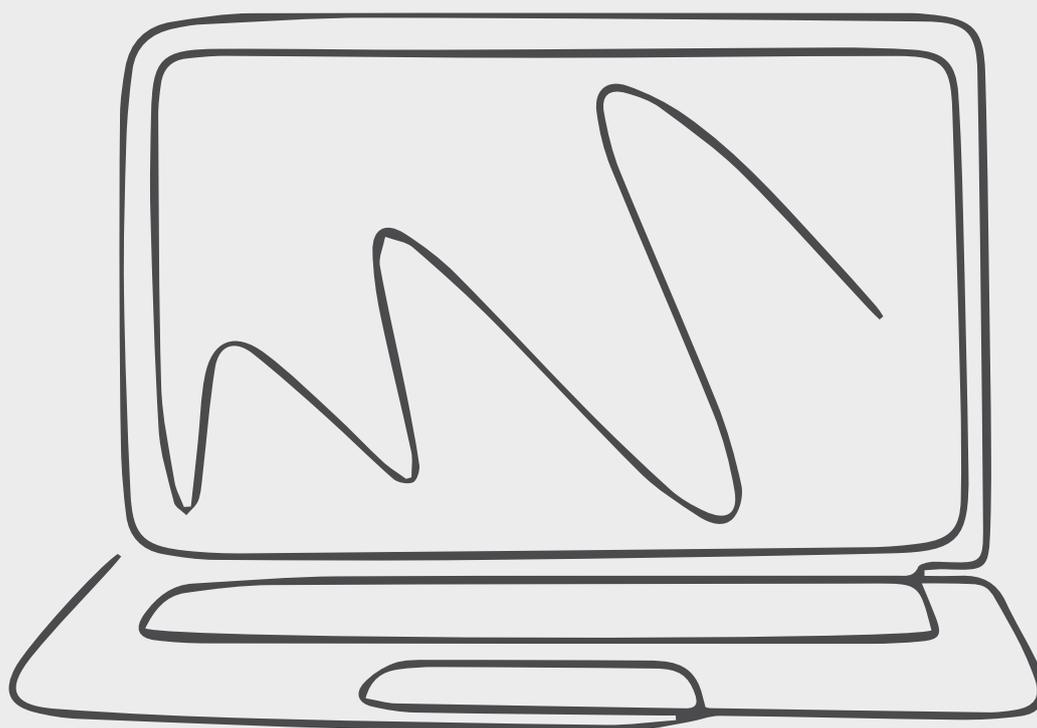


# 《检举手册》



本手册描述如何使用 SIAD 提供给集团公司全体员工的网络应用程序来报告组织中可疑的不当行为和非法活动和/或对此表达担忧。

使用网络应用程序“**Comunica Whistleblowing**”，员工可以按照欧盟法律、适用的当地法律和道德规范等规定插入报告，道德规范是公司采用的组织、管理和控制模式的重要组成部分。

# 目录

● Home	4
● 已注册用户的访问权限	5
● 未注册用户的访问权限	5
● 恢复帐户详细信息	7
● 开始报告	8
● 初步信息	9
● 填写报告	10
● 最终信息	11
● 文档预览	12
● 发送通知	13

# Home

通过 SIAD 集团网站的专用页面访问网络应用程序“Comunica Whistleblowing”  
<https://www.thesiadgroup.com/siad-whistleblowing>

Legislative Decree 231/2001 and the anti-corruption guidelines, as well as violations of company rules and policies that may result in fraud or potential damage, in respect of colleagues, shareholders and stakeholders in general or that involve actions of a harmful or unlawful nature relative to the interests and reputation of the company.

Reports must be made in good faith and not anonymously.

Maximum protection of the whistleblower and the reported individuals is guaranteed through specific security measures. The portal ensures that the writer's identity and the content of the report remain confidential, particularly by using specific security protocols and cryptographic tools that protect personal data and information, including those in any attachments.

The reports made by Employees will be received by the Appointed Manager, an internal member of the Supervisory Body of SIAD S.p.A., the committee that deals with corporate compliance in accordance with the relevant Italian legislation.

The entire whistleblowing management process protects the whistleblower from any potential direct or indirect pressure and discrimination in the workplace. The whistleblower also has the opportunity to follow the progress of the investigation.

The reports will be inserted by Employees and processed by the Appointed Manager through the web portal Whistleblowing powered by company Unione Fiduciaria. Also further communications between the Employee and the Manager appointed will be done through this web portal

All the personal data are processed pursuant to EU Regulation 2016/679 and subsequent amendments and additions, as well as any other applicable provision relating to the protection of personal data, including the provisions of the Italian Data Protection Authority, in full respect of fundamental rights and freedoms, with particular regard to the confidentiality of the identity of the subjects involved and the security of the processing.

[SIAD Whistleblowing Manual for employees](#)

[SEND YOUR REPORT](#)

点击链接“send your report”进入网络应用程序。

## 已注册用户的访问权限

请求的登录令牌是“SIADWB”，它将自动呈现在表单中。

插入您的用户名和密码，然后点击“Login”进入系统。

Insert TOKEN to log in

SIADWB

Insert username and password

[Recover your account details](#)

Username

Password

If you are not yet a user, please complete the [registration form](#) to access the system.

LOGIN

## 未注册用户的访问权限

点击“registration form”进行注册并创建您的帐户。

Username

Password

If you are not yet a user, please complete the [registration form](#) to access the system.

LOGIN



点击“registration form”后,您将进入一个页面,您需要在该页面上填写表单以创建帐户。

首先,确保拥有有效的电子邮箱。您需要用它来完成注册。

### 填写注册表

1. 插入您的用户名 (使用大写字母、小写字母、数字);
2. 创建 password
3. 创建您的个人密码 (使用大写字母、小写字母和数字的组合), 并再次输入以确认密码;

(完成注册后,您需要用户名和密码才能进入系统)

4. 插入您的姓名;
5. 插入您的电子邮箱;
6. 插入令牌:“SIADWB”
7. 最后,输入在右下角找到的安全码,然后点击:“Register”



## WHISTLEBLOWING

Powered by UNIONE FIDUCIARIA...

To register you must complete all the mandatory fields in the form.

After registration, you will receive a confirmation e-mail containing the details necessary for the activation of your profile.

Username\*

MarioRossi

Password\*

.....

Confirm Password\*

.....

First Name\*

Mario

Last Name\*

Rossi

Email\*

rossimario@email.com

TOKEN\*

SIADWB

Please insert the security code shown in the image

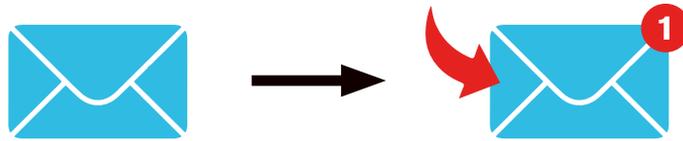
S27TVO

S27TVO|

[Refresh security code](#)

CANCEL

REGISTER



点击“Register”后,系统将向您提供的电子邮件地址发送一个确认链接,您必须点击该链接才能激活帐户,在这封电子邮件中您将找到帐户详细信息。确认后就可以进入系统。

## 恢复帐户详细信息

如果您忘记了“Username”和/或“password”,您可以点击“Recover your account details”来轻松地恢复它们。

Insert username and password  
[Recover your account details](#)

Username

---

Password

---

If you are not yet a user, please complete the [registration form](#) to access the system.

您可以通过电子邮件接收您的帐户详细信息。

插入令牌“SIADWB”;

插入注册时使用的用户名或电子邮箱;

填写您在右下角看到的安全码;

点击“Recover”

### Reset Password

TOKEN\*

TOKEN

---

Username\*

Write here your username (alphanumeric, max 20 char.)

---

Please insert the security code shown in the image

KXDTSH

---

[Refresh security code](#)

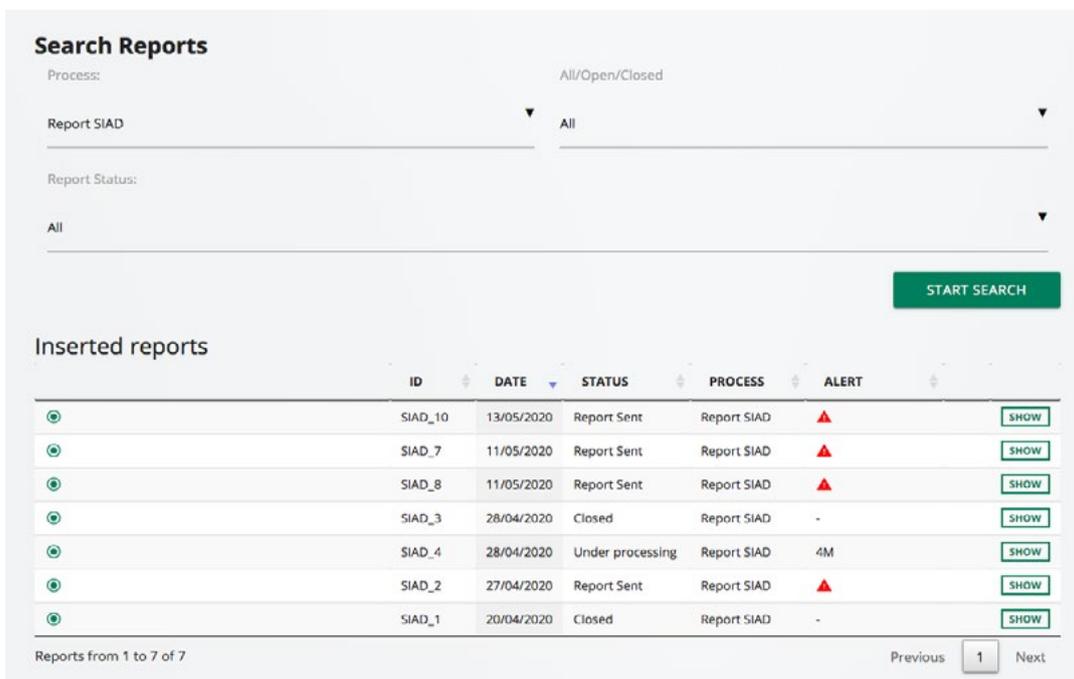
RECOVER



# 开始报告

登录后, 您将有二个选择:

- C点击:“Insert Report” 您可以插入新报告 (遵循本指南, 您将找到用于插入报告的更多步骤);
- 点击:“Go to your Reports” 您可进入包含您插入的所有报告的页面 (此功能用于验证所有已插入的报告的状态:例如:日期、报告已发送 - 工作人员正在分析/处理您的请求 - 报告已关闭)



示例: 屏幕截图搜索报告

# 1 初步信息

点击“Insert Report”后,您可以开始撰写报告;您必须在这里插入初步信息:

- 您任职的 SIAD 集团公司;
- 报告涉及的 SIAD 集团公司;
- 可疑违规行为或活动发生的国家;
- 涉及的部门(如果您找不到合适的部门名称,请在下面书写部门名称)

填写初步信息后,点击“Continue”

The screenshot shows a web form titled "Preliminary Informations" with a progress indicator at the top showing three steps, with the first step (1) being active. The form contains the following fields:

- Question: "In which Company of SIAD Group do you work?\*" with a text input field containing "Company's name S.p.a."
- Question: "To which company or entity does the report refer?\*" with a text input field containing "Company's name S.p.a."
- Question: "Country in which the alleged violation occurred\*" with a dropdown menu showing "Italy".
- Question: "Which area of your company does the report refer to?\*" with a dropdown menu showing "Sales and Marketing".
- A text input field with the placeholder "If the item is not present, insert it here".

At the bottom left is a "BACK" button, and at the bottom right is a "CONTINUE" button with a mouse cursor pointing to it. A note at the bottom left states "Fields marked with \* are mandatory".

## 2

# 填写报告

初步信息之后的步骤是详细描述对报告有用的事件：

- 涉及的人员；
- 所报告事件的地点和日期；
- 事件/行为违规的理由；
- 报告的支持文档；
- 这些支持文档的恢复方法；
- 事件描述

填写完所有要求的信息后, 点击 “Continue”

Report SIAD

### Fill in your report

Who are the main parties or subjects involved?\*

Mario Rossi - Purchasing Officer

Place and date / time frame in which the events in question occurred\*

Bergamo

The conduct is illegal because:\*

Violates the Code of Conduct / Code of Ethics

It causes a reputational damage

It causes capital damage to the company

It is a case of mis-management

Violates environmental / occupational safety regulations

Other

Attach any documents useful for reporting

I have documents to support the report

Not applicable (I do not have supporting documents)

I am aware of documents useful for reporting

Indicate how the manager could get to these documents

Summon Purchasing Office Manager

Specify

Facts description\*

Mario Rossi has accounted for false invoices in order to create tax advantages for the company

BACK CONTINUE

# 3

## 最终信息

这是提交报告的最后一步：回答问题。

The screenshot shows a web interface for the 'Final information and sending notification' step. At the top, a progress bar indicates three steps, with the third step (3) being the current one. To the right of the progress bar is an 'End' button. The main content area is titled 'Final information and sending notification' and includes the question: 'Have you already reported the facts to other authorities and / or internal parties and / or external to the company?'. Below the question are two radio button options: 'NO' (which is selected) and 'YES'. There is a text input field with the placeholder text 'Write here to whom you reported facts'. At the bottom left is a 'BACK' button, and at the bottom right is a 'CONTINUE' button, which is highlighted with a mouse cursor.

回答完问题后, 您可以继续点击 “Continue”

## 4 文档预览

发送报告前,您将看到文档预览,这样您就可以检查所有插入的数据和信息。如需更改某些信息,请点击“Back”以回到上一步。检查完所有数据后,点击“Send”,您的报告将会发送出去。

**Report Preview** Report SIAD

In which Company of SIAD Group do you work?  
Company's name S.p.a.

To which company or entity does the report refer?  
Company's name S.p.a.

Country in which the alleged violation occurred  
Italy

Which area of your company does the report refer to?  
Sales and Marketing

Who are the main parties or subjects involved?  
Mario Rossi - Purchasing Officer

Place and date / time frame in which the events in question occurred  
Bergamo

Attach any documents useful for reporting  
I am aware of documents useful for reporting, Summon Purchasing Office M

The conduct is illegal because:  
Violates the Code of Conduct / Code of Ethics

Have you already reported the facts to other authorities and / or internal parties and / or external to the company?  
NO

Facts description  
Mario Rossi has accounted for false invoices in order to create tax advantage

**BACK** **SEND**

注意:点击“Send”,报告将发送给负责的公司主管,您将不能再更改插入的数据,也不能拦截已发送出去的报告。

# 5

## 发送通知

提交报告后，您将收到系统发来的确认消息。您可以从这里进入网页查看您提交的报告。

