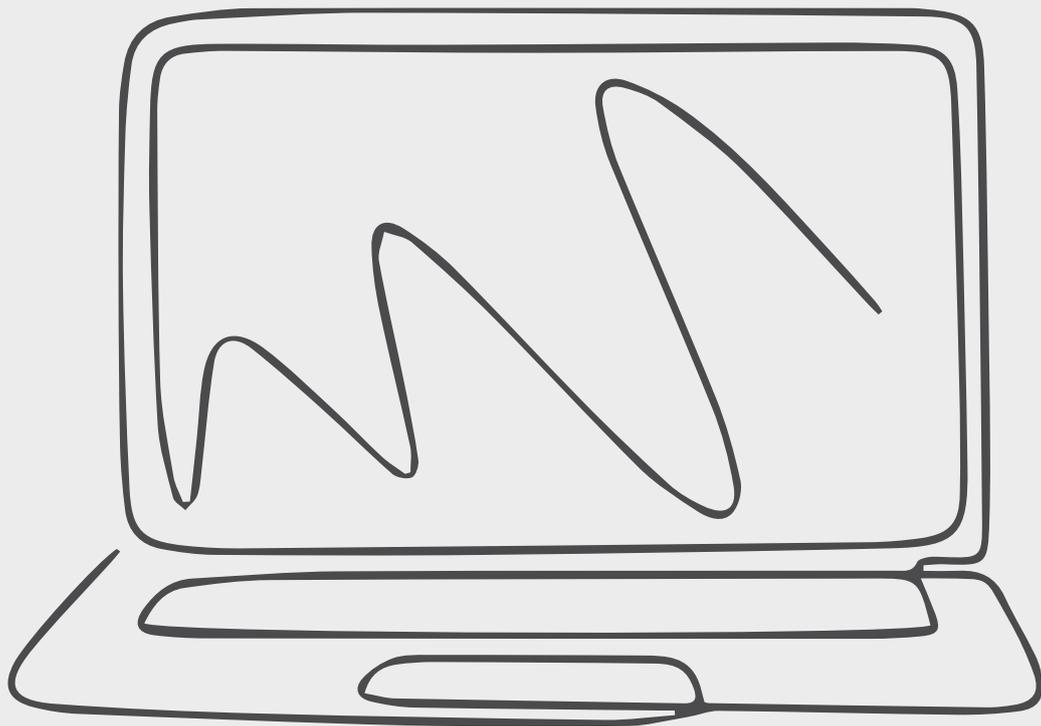


WHISTLEBLOWING MANUAL



This manual describes how to use the web application that SIAD made available to all employees of Group companies to report and/or raise concerns of suspected misconduct and illegal activities occurring in the organization.

Using web application “**Comunica Whistleblowing**” employees can insert reports in compliance, among the others, with the provisions of EU law, applicable local legislation and the Code of Ethics, which is an integral part of the Organization, Management and Control Model adopted by the Company.

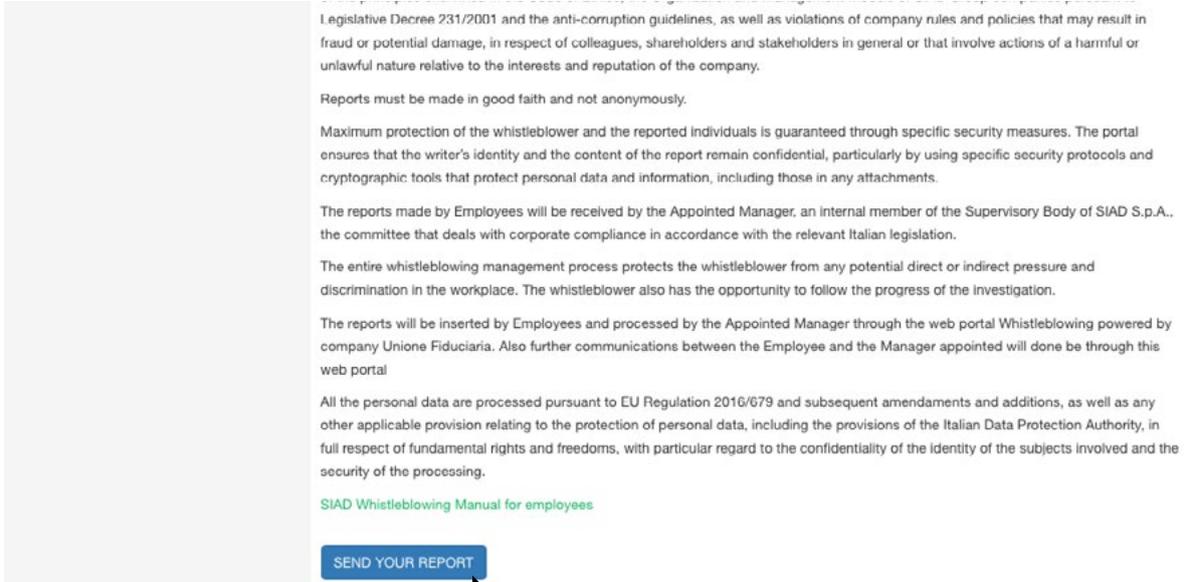
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Home

Access web application “**Comunica Whistleblowing**” through the dedicated page of SIAD Group website:

<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 done be 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

Click on the link “**send your report**” to enter the web application.

Access for Already Registered User

Requested token to log in is **SIADWB** and it will be present automatically into the form.

Insert your user and password and click on **“Login”** to enter the system.

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

Access for User not yet Registered

Click on **“registration form”** to do your registration and create your account.

Username

Password

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

LOGIN



After clicking on “**registration form**” you will enter the page where you will have to fill in the form needed to create your account.

First make sure to have an active E-mail. It is needed to complete your registration.

Fill the registration form

1. Insert your username (*use capital letters, lowercase letters, numbers*);
2. Create your personal password (*use a combination of capital letters, lowercase letters and numbers*) and write it again to confirm it.

(You will need Username and password to enter the system after completing registration)

1. Insert your Name and Surname;
2. Insert your e-mail;
3. Insert Token: **SIADWB**;
4. To conclude write security code you find on the bottom right then click on: **“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

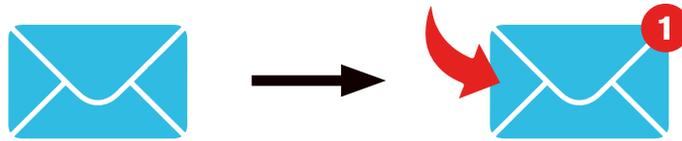
S27TVO|

[Refresh security code](#)

CANCEL

REGISTER





After clicking on “**Register**” the system will send to the email address you have provided a confirmation link, you have to click on it to activate your account, in the email you will find your accounts details. After confirmation it is possible to enter the system.

Recover your Account Details

In case you have forgot your Username and/or password you can easily recover them clicking on “**Recover your account details**”

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.

You can receive on your email your account details.

Insert token: “**SIADWB**”;

Insert username or email used for registration;

Fill in security code you see on the bottom right;

Click on “**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



Start the Report

After log in you will have two options:

- Clicking: **“Insert Report”** you can insert a new report (*following this guide you will find further steps to insert your report*);
- Clicking: **“Go to your Reports”** you can go to the page with all the reports you have already inserted (*this function is usefull to verify the status of all reports inserted: example: date, report sent - taking charge - report closed*)



Search Reports

Process:

Report SIAD:

Report Status:

START SEARCH

Inserted reports

	ID	DATE	STATUS	PROCESS	ALERT	
🔍	SIAD_10	13/05/2020	Report Sent	Report SIAD	▲	SHOW
🔍	SIAD_7	11/05/2020	Report Sent	Report SIAD	▲	SHOW
🔍	SIAD_8	11/05/2020	Report Sent	Report SIAD	▲	SHOW
🔍	SIAD_3	28/04/2020	Closed	Report SIAD	-	SHOW
🔍	SIAD_4	28/04/2020	Under processing	Report SIAD	4M	SHOW
🔍	SIAD_2	27/04/2020	Report Sent	Report SIAD	▲	SHOW
🔍	SIAD_1	20/04/2020	Closed	Report SIAD	-	SHOW

Reports from 1 to 7 of 7

Previous Next

Example: Screenshot Search Reports

1 Preliminary Information

After clicking on “**Insert Report**” you can start writing your report; here you will have to insert preliminary information:

- Company of SIAD Group you work in;
- Company of SIAD Group the report is about;
- Country where the suspected violation took place;
- Department involved (*if you don't find a suitable department name write it down on the bottom*)

After filling preliminary information click on “**Continue**”.

The screenshot shows a web form titled "Preliminary Informations" within a "Report SIAD" interface. At the top, a progress bar indicates three steps, with the first step (1) being the current one. The form contains the following fields:

- "In which Company of SIAD Group do you work?*" with a text input field containing "Company's name S.p.a."
- "To which company or entity does the report refer?*" with a text input field containing "Company's name S.p.a."
- "Country in which the alleged violation occurred*" with a dropdown menu showing "Italy".
- "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, there is a "BACK" button. At the bottom right, there is a green "CONTINUE" button with a mouse cursor pointing to it. A note at the bottom left states "Fields marked with * are mandatory".

2

Fill in your Report

The step after preliminary information is the detailed description about events usefull for the report:

- Who are people involved;
- Location and date of reported events;
- Why events/behaviours are not in compliance;
- Usefull documents for the report;
- How to recover these usefull documents;
- Describtion of events.

After filling all requested information click on “Continue”

1 — 2 — 3 End

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

Specify

Facts description*

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

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

BACK CONTINUE

3

Final Information

This is the last step for submitting your report: answer to the question.

The screenshot shows a progress bar at the top with three steps. Step 1 is highlighted in green, step 2 is in grey, and step 3 is in grey. To the right of the progress bar is a radio button labeled 'End'. Below the progress bar is the title 'Final information and sending notification' and the text 'Report SIAD'. The main content area contains the question: 'Have you already reported the facts to other authorities and / or internal parties and / or external to the company?'. There are two radio button options: 'NO' (which is selected) and 'YES'. Below the options 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.

After answering the question you can go ahead clicking on “Continue”

4

Document Preview

Before sending your report you will see a document preview so you will be able to check all inserted data and information.

If you need to change some information click on **“Back”** to go to the previous step. After checking all the data click on **Send** and your report will be sent.

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

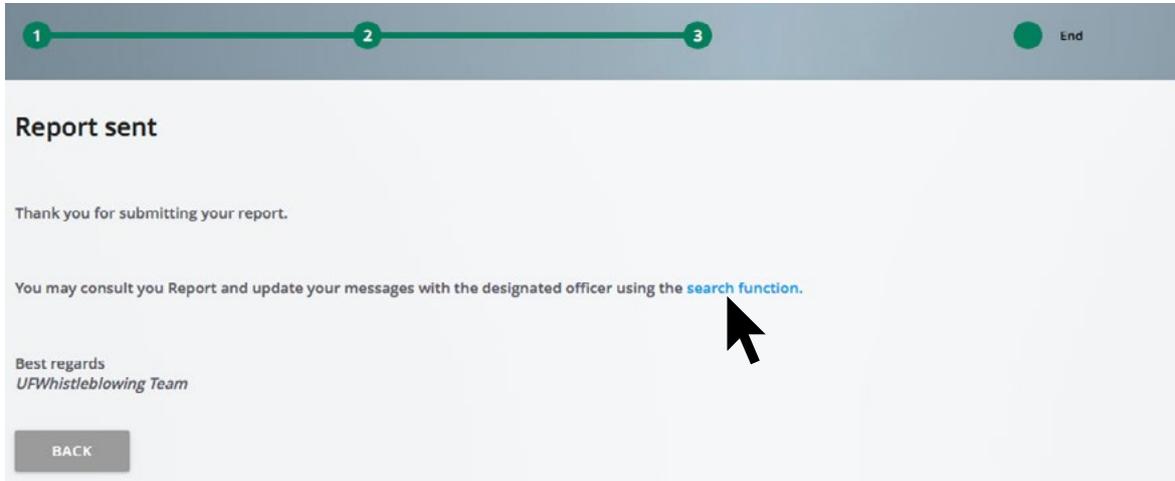
BACK **SEND**

Pay Attention: Clicking on **“Send”** the report will be forwarded to the company Manager in charge and it will be not possible anymore to change inserted data or stop the report sent.

5

Send Notification

After submitting the Report, you will receive a confirmation message from the system. From here you can enter the webpage to look at your submitted reports



1 2 3 End

Report sent

Thank you for submitting your report.

You may consult you Report and update your messages with the designated officer using the [search function](#).

Best regards
UFWhistleblowing Team

BACK