



**WHISTLEBLOWING  
POLICY  
("HAVE YOUR SAY")**

Ed.1 Rev.0  
06/03/2019

## **1. Objective**

This Policy establishes the procedure for reporting an unlawful act or omission that constitutes or may constitute a violation of laws and regulations, the values, and principles established in the Ethical code of IMCA Spa, internal control principles, company policies that could cause any type of harm (economic, environmental, to safety of workers or of third parties, or merely reputational) to IMCA and their customers, third parties and more in general, the community. The addressees of this policy are: the members of the company boards, employees, the customers, suppliers, partners, consultants and, more generally the "Third Parties".

## **2. Reports**

Addressees who discover or become aware of possible unlawful conduct or irregularities committed by parties who have relations with IMCA in the course of their working activities or that have an impact on said working activities, must activate this Policy by immediately reporting the actions, circumstances that have caused said violations or are contrary to IMCA's principles. Reports can be signed or may also be made anonymously as long as they are detailed and documented, so as to provide useful and appropriate information to effectively verify the validity of the events reported.

The Report must be sent by filling in a specific form available at IMCA's SPA web site [www.imcaspa.it](http://www.imcaspa.it) in the section "QUALITY/ETHICS" to the e-mail address "segnalazioni@imcaspa.it, or posting the reports in the letter boxes placed in the plant.

## **3. Confidentiality and no retaliation**

IMCA Spa encourages Addressees to promptly report possible conduct or irregularities and in doing so IMCA guarantees the confidentiality of the Report and the information it contains, as well as the anonymity of the Whistleblower or sender even if the Report is proven to be incorrect or unfounded. Any kind of threat, retaliation, penalty or discrimination against the Whistleblower will not be tolerated.

The manager, here named, RGS is responsible for checking the validity of the Report on behalf of IMCA without prejudice to any specific local law on the subject. RGS will perform a prompt and thorough investigation, in observance of the principles of impartiality, fairness and confidentiality.

## **4. Management of the Reports**

Every week RGS analyzes all the reports which are then recorded in the "Reports – "Have your say" log.

RGS verifies the information and may request to interview the whistleblower or may request assistance from the company functions competent in each instance. Once the checking phase has been completed RGS will prepare a summary report on the investigations carried out and the evidence that he/she has considered. Based on the results, RGS will then share the report with the company functions competent in each instance, so that they can draw up intervention plans and decide what actions to take also to protect IMCA. Furthermore, RGS will report the results of the investigations and checks on the web site and affixed in the notice board in the plant. Waiting time for the resolution depends on case by case. All the docs are kept by RGS.

### **Legal References**

*Law Decree 30.11.2017, n. 179 – Whistleblowing*

Date 06/03/2019