

INSTRUCTIONS FOR WHISTLEBLOWING MANAGEMENT AND PROTECTION OF THE WHISTLEBLOWER

18/07/2023

Whistleblowing



Who does it involve?

All Italian and European companies of the Arcese Group (hereinafter ARCESE), subject to Directive (EU) 2019/1937.



The procedure will be developed for each country and company in a detailed and specific way, standardising local regulations.

Who is it aimed at?

- All employees (subordinate workers);
- Members with administration, management, control, supervision or representation functions;
- Self-employed workers who carry out their activities at Group companies;
- Volunteers and interns (paid or unpaid) who work for Group companies;
- Freelancers and consultants who work for Group companies.



What is its purpose?

To ensure protection, not only for the protection of confidentiality, but also from possible retaliatory measures for subjects who expose themselves by whistleblowing, contributing to the emergence and prevention of risks and situations prejudicial to the Group companies and consequently to the collective public interest.

To provide guidelines and operational information to the reporter regarding the subject, contents, recipients and methods of management of the reports as well as the forms of protection that are offered in line with European and local regulatory references.



When can whistleblowing be carried out?

When you become aware of illicit conducts founded or presumed based on precise and consistent factual elements relating to the work context. The subject of whistleblowing may be specific breaches of national and EU regulations and/or illicit acts of a different nature that harm the public interest or the integrity of the Group companies.

Information on reportable breaches does not include news that is clearly unfounded, information that is already totally in the public domain, as well as information acquired only on the basis of rumours or unreliable sources (so-called rumours).

Who is the recipient of the whistleblowing reports?

ARCESE has appointed a Whistleblowing Committee (Committee) at central level which has been entrusted with the management of reports regarding the Italian companies of the Group and with the task of coordinating reports regarding foreign companies with local representatives. The Committee comprises the following functions: Global Safety, Security and Sustainability Director, Global Chief People Officer, Legal Manager. The companies have the right to appoint a delegate also at local level (authorised person) who will act in coordination with the CIW, or its coordinator.

What cannot be subject to whistleblowing?

- (i) Disputes, claims or requests linked to a personal interest of the reporting person which relate exclusively to their individual working relationships or inherent to their relationships with hierarchically superior figures.
- (ii) Reports of breaches relating to national security, as well as procurement relating to aspects of defence or national security.

Which are the internal channels for whistleblowing?

ARCESE, having consulted the union representatives, has adopted an internal IT channel - Web platform. Each Group company has access to the platform via a dedicated URL published on its website.

<u>How to whistleblow via the Sestante platform</u>	
	Access the web page and read the privacy policy (read). Click the link https://arcese.software231.eu/ of the Company for which you want to whistleblow and follow the instructions you will find on the platform and on the website - whistleblowing section.
	Click on the " new whistleblow " button and fill in the mandatory fields marked with (*), i.e., title and subject of the report. The whistleblowing party has the right to also fill in the other non-mandatory fields that provide information regarding the identity of the reporting party. In any case, please remember that the whistleblow must be substantiated by specifying: - The circumstances of time and place in which the reported event occurred; - The description of the fact (even in the presence of evidence or with the possibility of attaching documents); - The elements that allow identifying the person to whom the reported facts can be attributed.
	The platform will optionally ask you for consent to reveal your identity (if provided) to people other than those competent to receive and manage the reports.
	When you are sure of the content to be forwarded / in written form or via voice, click on "Complete whistleblowing report and send".
	At this point, the platform will release the unique alphanumeric code (ticket code) which you must note down , keep and not disclose to third parties. It will be the only way through which you will be able to access this report again to monitor its progress and the manager's responses, by clicking on "Reopen Ticket" on the initial screen (whether you have made an anonymous report or if you have detected your identity).
	Once the whistleblowing report has been made, you will receive acknowledgement of receipt or notification, directly visible on the platform. With this notice the deadline for notification of receipt of the report is considered to have elapsed.
	Within three months (except in special cases) from the acknowledgement of receipt or notification you will receive the outcome of your report.
	You can also send reports anonymously via the platform. The same will be taken into consideration in different ways from country to country in accordance with local regulations.
	The data and information present on the platform are archived within it and kept for a period of 5 years.

WHISTLEBLOWING OPERATING SCHEME



PLEASE REMEMBER:

- ⇒ ARCESE PROMOTES THE ETHICAL PRINCIPLES OF RESPECT FOR THE INTEGRITY AND PROTECTION OF THE WHISTLEBLOWER THROUGHOUT THE PROCESS;
- ⇒ ARCESE IS COMMITTED TO PROTECTING THE PRIVACY OF ALL PEOPLE INVOLVED;
- ⇒ WHISTLEBLOWING REPORTS ARE SECURELY STORED WITHIN THE PLATFORM;
- ⇒ ALL WHISTLEBLOWING REPORTS ARE SUBJECT TO PRELIMINARY INVESTIGATION, YOU MAY BE CONTACTED FOR FURTHER INFORMATION BY AUTHORISED PARTIES (COMMITTEE OR DELEGATED FUNCTIONS);
- ⇒ THE REPORT REMAINS CONFIDENTIAL.

PROCEDURE FOR WHISTLEBLOWING MANAGEMENT AND PROTECTION OF THE WHISTLEBLOWER ARCESE TRASPORTI SPA - ITALIA

1. PREMISES

Arcese Trasporti S.p.A. (hereinafter also referred to as the "**Company**"), having consulted the trade union representatives, has set up an internal communication channel to report actual or suspected violations without fear of suffering retaliation and with maximum respect for the protections provided to the whistleblower.

The Company adopts an Organisation, Management and Control Model pursuant to Legislative Decree 231/01 (MOGC) therefore the internal reporting channel is provided for within the Model. This procedure is to be understood as an appendix to the Organisation, Management and Control Model.

2. REGULATIONS

- ⇒ Directive (EU) 2019/1937;
- ⇒ Regulation 2016/679 or GDPR;
- ⇒ Legislative Decree no. 24/2023 (hereinafter the "**Decree**"): has implemented, in Italy, European Directive no. 2019/1937 on whistleblowing, repealing or modifying the provisions on the matter provided for by Law no. 179/2017 for the public sector and by Legislative Decree no. 231/2001 for the private sector;
- ⇒ Legislative Decree 231/01 of 2001 governing the administrative liability of legal entities;
- ⇒ The Guidelines Scheme on the protection of people who report breaches of union law and the protection of people who report breaches of national regulatory provisions - procedures for the submission and management of external reports - ANAC (ITALIAN NATIONAL ANTI-CORRUPTION AUTHORITY).

3. OBJECTIVES AND SCOPE OF APPLICATION

This procedure aims to:

- ✓ **Promote a corporate culture based on transparency, responsibility and integrity;**
- ✓ **Establish and raise awareness of the internal whistleblowing channel;**
- ✓ **Define the responsibilities for the whistleblowing management process and the functioning of the Internal Whistleblowing Committee (CIW);**
- ✓ **Describe the protections provided for the whistleblower and the protection system in compliance with the legislation;**
- ✓ **Describe the penalty system provided by law for the Company and the whistleblowing party.**

The procedure applies to the company Arcese Trasporti S.p.A. and to all the Italian companies of the Arcese Group with at least 50 employees and to all the Italian companies equipped with MOGC.

4. DEFINITIONS

WHISTLEBLOWER or REPORTER: the individual who reports breaches within their work context.

BREACHES: behaviours, acts or omissions that damage the public interest or the integrity of the public administration or private entity.

WORK CONTEXT: the work or professional activities, present or past, carried out within the Company, through which, regardless of the nature of such activities, a person acquires information on breaches and in which context he or she could risk suffering retaliation in case of whistleblowing.

WHISTLEBLOWING REPORT: communication by the whistleblower concerning information on one or more breaches.

INTERNAL WHISTLEBLOWING: the written or oral communication of information on breaches, submitted via the internal whistleblowing channel adopted by the Company.

EXTERNAL WHISTLEBLOWING: the written or oral communication of information on breaches, submitted via the external whistleblowing channel managed by the ANAC.

PUBLIC DISCLOSURE: placing breaches in the public domain through print or electronic means in order to reach a large number of people (including the use of social networks).

REPORTING TO THE JUDICIAL OR ACCOUNTING AUTHORITY: possibility of contacting the competent Judicial or Accounting Authority, to report illicit conduct of which one becomes aware in the public or private working context.

RETALIATION: any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report which causes or may cause, directly or indirectly, unfair damage to the reporting person or to the person who filed the complaint.

WHISTLEBLOWING COMMITTEE: the internal office made up of several figures from the Company's corporate organisation, responsible for receiving and managing the whistleblowing report including investigative activities (hereinafter also referred to as the "Committee").

ANAC: Italian National Anti-Corruption Authority [Autorità Nazionale Anticorruzione] (<https://www.anticorruzione.it>).

FACILITATOR: an individual who assists the whistleblower in the whistleblowing process, operating within the same working context and whose assistance must be kept confidential.

5. WHISTLEBLOWING FEATURES

5.1 WHO CAN WHISTLEBLOW: THE WHISTLEBLOWER

Arcese Trasporti S.p.A., in compliance with the regulations, identifies the following as potential whistleblowers:

INTERNAL STAKEHOLDERS:	EXTERNAL STAKEHOLDERS:
- All employees, regardless of their contractual status and function held; - Members and people with administrative, management, control, supervisory or representation functions, including de facto;	- Self-employed workers and collaborators who provide goods or services or carry out works in favour of the Company; - Volunteers and interns, paid and unpaid, who provide their services in the Company's working context; - Freelancers and consultants who provide their services to the Company;
OTHER SUBJECTS TO WHOM THE WHISTLEBLOWING PROTECTIONS ARE EXTENDED	
- Facilitators; - People from the same working context with family ties up to the fourth degree and stable emotional ties; - Work colleagues with a usual and current relationship in the same working context; - The entities owned by the whistleblower or for which the whistleblower works or which operate in the same working context (the rationale in this case is to protect, for example, these entities against commercial retaliation).	

The whistleblowing report can also be made by a person who is in the selection or pre-contractual phase, in the probationary period and after the dissolution of the relationship.

This procedure refers to cases in which the reporting party makes his identity known and in cases in which it has become known in accordance with current legal provisions. The rationale is to ensure these subjects the protections provided for by the law, guaranteeing the confidentiality of the personal data provided.

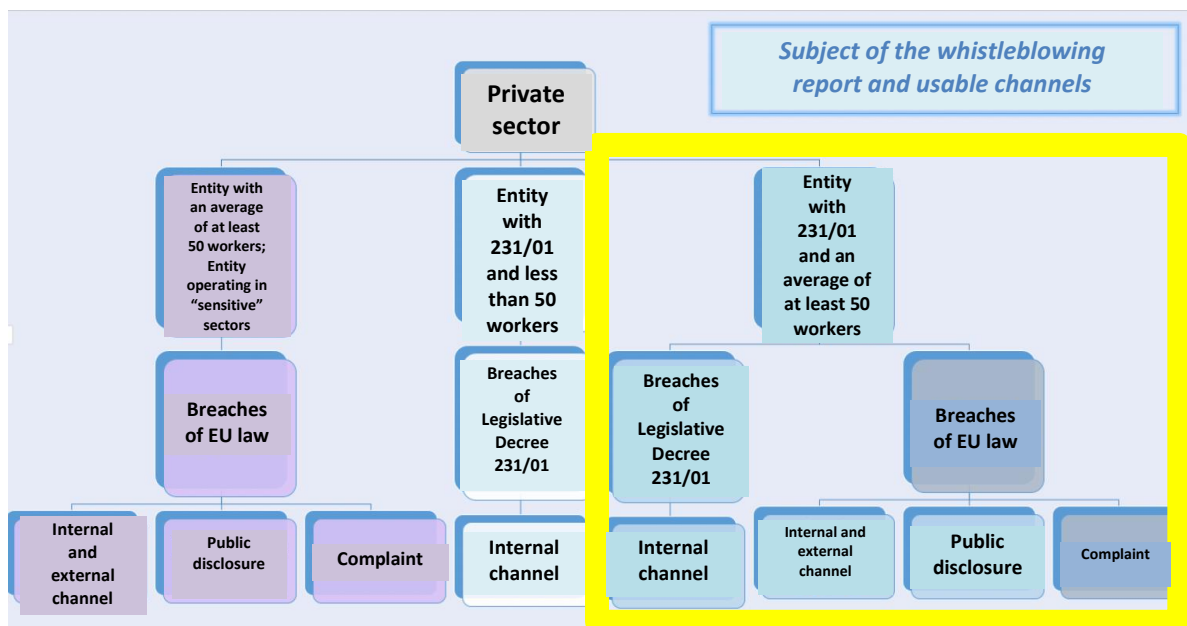
5.2 ANONYMOUS WHISTLEBLOWING

In the case of anonymous whistleblowing, the content is decisive for the purposes of its admissibility or "taking charge", therefore, only detailed whistleblowing reports accompanied by evidence will be taken into due consideration.

The protections apply to anonymous whistleblowers, subsequently identified, who have reported to ANAC that they have suffered retaliation.

5.3 PURPOSE OF WHISTLEBLOWING: WHAT CAN BE SUBJECT TO WHISTLEBLOWING?

The Decree differentiates the subject of the report in relation to the characteristics of the legal entities involved; the following table summarises what can be reported and through which channels:



Source: ANAC Guidelines Scheme

Generally speaking, the whistleblowing report may concern all relevant conduct pursuant to Legislative Decree. 231/01 or which imply a breach, be it presumed or confirmed, of Model 231 or of the Code of Ethics, to which the following are added:

- (i) administrative, accounting, civil and criminal offences that harm the public interest or the integrity of the public administration or private entity;
- (ii) offences that fall within the scope of application of European Union or national acts or of national acts that constitute the implementation of European Union acts relating to the following sectors: public procurement, services, products and financial markets and prevention of money laundering and terrorist financing, product safety and compliance, transport safety, environmental protection, radiation protection and nuclear safety, food and feed safety and animal health and welfare; public health, consumer protection; protection of privacy and protection of personal data and security of networks and information systems;
- (iii) acts or omissions detrimental to the financial interests of the European Union;
- (iv) acts or omissions relating to the internal market, including infringements of European Union competition and state aid rules, as well as infringements relating to the internal market linked to acts infringing corporate tax rules or mechanisms the purpose of which is to obtain a tax advantage which defeats the object or purpose of the applicable corporate tax legislation;
- (v) acts or conduct that frustrate the object or purpose of the provisions set out in Union acts in the aforementioned sectors;

By way of non-exhaustive example, the whistleblowing report may concern:

- ⇒ **Active and passive corruption;**
- ⇒ **Behaviour aimed at hindering the control activities of the Supervisory Authorities (e.g., failure to provide documentation, presentation of false or misleading information);**
- ⇒ **Promise or giving of money, goods or services or other benefits aimed at bribing suppliers or customers;**
- ⇒ **Unlawful fiscal, accounting and financial conduct;**
- ⇒ **Tax fraud;**
- ⇒ **Breaches of human rights;**
- ⇒ **Environmental and worker health and safety breaches;**
- ⇒ **Illicit use of personal data or clear violations of the law protecting privacy;**
- ⇒ **Competition and state aid breaches;**
- ⇒ **Breaches of the Code of Ethics and of the rules contained in the Organisation, Management and Control Model.**

To protect the dignity and health of workers, as well as the moral integrity and values of the Company and the Group, the possibility is given to report cases of harassment, abuse suffered in the workplace and/or discrimination in relation to sex, ethnicity, religious faith, sexual orientation.

It is always possible for the person making the whistleblowing report to consult with his/her direct superior before appealing to the Committee, who, however, once the subject of the report is understood, will be required to send it to the Committee if the conditions are met.

The provisions of this procedure do not apply to disputes, claims or requests linked to a personal interest of the reporting person or of the person who has filed a complaint with the judicial or accounting authority which relate exclusively to their individual working relationships or relating to own relationships with hierarchically superior figures.

5.4 HOW WHISTLEBLOWING MUST BE CARRIED OUT

Whistleblowing reports must preferably include the following elements:

- ⇒ **A full description of the facts being reported;**
- ⇒ **If known, the circumstances of time and place in which the breaches were committed or for which there is a presumption;**

- ⇒ **The personal details or elements (qualification, office, activity carried out) of the reported subject in order to allow identification;**
- ⇒ **Indications of any witnesses or individuals who can report on the facts being reported;**
- ⇒ **Any attachments or documents that can confirm the validity of the facts reported;**
- ⇒ **Any other information that can provide useful feedback regarding the existence of the facts.**

The following are the subject of whistleblowing reports and therefore eligible:

- ⇒ **Communications of retaliation that the whistleblower believes he or she has suffered following a whistleblowing report.**

The alleged retaliations, also potentially subject to reporting, must be communicated exclusively to the ANAC. Trade union representatives cannot notify the ANAC of alleged retaliation on behalf of the whistleblower.

However, the following are excluded and therefore **INADMISSIBLE**:

- ⇒ **Whistleblowing reports linked to a personal interest of the person making the report, which exclusively concern their individual working relationships with colleagues or hierarchically superior figures;**
- ⇒ **Reports based on mere suspicions or rumours;**
- ⇒ **Reports of breaches relating to national security.**

6. METHODS AND CHANNELS OF WHISTLEBLOWING

6.1 WHISTLEBLOWING CHANNELS

It is important to point out that the Decree potentially provides for more than one reporting method:

Internal channel	ANAC external channel	Public disclosure	Complaint
Channel set up by the Company and managed by the Committee.	The whistleblower can appeal to the ANAC via the website https://www.anticorruzione.it and by accessing the whistleblowing services set out there pursuant to Article 7 of the Decree when: - the internal whistleblowing channel is not active or does not comply with legal requirements (e.g., when it does not guarantee confidentiality); - an internal whistleblowing report has already been made without receiving a response; - fears that whistleblowing could lead to the risk of retaliation; - fears that the breach may constitute an imminent or obvious danger to the public interest.	The whistleblower may resort to public disclosure through the press or media, social media when: - they have already made a whistleblowing report internally and/or to ANAC without receiving a response; - fears that whistleblowing could lead to the risk of retaliation; - they believe that the breach may constitute an imminent or obvious danger to the public interest.	Lastly, the Decree also recognises the right of the whistleblower to report illegal conduct that can be considered as a crime directly to the Judicial Authority.

6.2 THE INTERNAL WHISTLEBLOWING CHANNEL: THE SESTANTE WEB PLATFORM

Arcese Trasporti S.p.A. has set up a specific internal whistleblowing channel which the whistleblower can use.

The platform uses the Sestante web-based solution, which offers a customised portal for each Group company, guaranteeing compliance with all the necessary legal requirements, including those envisaged for the organisation and management of the processing of personal data and the obligations required by the privacy legislation (Legislative Decree no. 196/2003 – Personal data protection code; EU Regulation 2016/679 on the protection of personal data).

The platform enables all internal and external stakeholders to send whistleblowing reports to the internal parties authorised to manage the report (Whistleblowing Committee), in order to guarantee effective and confidential communication.

Access to the platform takes place from the institutional website for all Group companies.

Before making the report, the person making the report is asked to read a privacy policy relating to the processing of their personal data.

The whistleblower has the option to choose whether to make a report by providing his/her personal details or in a totally anonymous form, inserting only the subject of the report and the reference topic.

After entering the report, the platform assigns a **unique identification code (ticket code)** which the reporter must keep and transcribe as it will allow him to verify the progress of his report.

Upon whistleblowing, the whistleblower receives a notification of receipt or notification visible directly on the platform.

The platform allows the reporter to make a written report or to transmit a voice message (recording).

For further operational details relating to the use of the platform, please refer to the document **"Instructions for the management of reports and protection of the whistleblower"**.

It is always possible for the whistleblower to request to be heard in person, the suggestion in this case is to access the platform anyway and send this request in the descriptive fields in order to track the request and maintain its confidentiality.

7. PROCEDURES FOR MANAGING WHISTLEBLOWING

7.1 WHISTLEBLOWING RECIPIENTS – INTERNAL WHISTLEBLOWING COMMITTEE (IWC)

Arcese Trasporti S.p.A. has established a Whistleblowing Committee responsible for receiving and managing whistleblowing reports. The Committee comprises the following functions:

- **Global Safety, Security and Sustainability Director (with the role of Coordinator);**
- **Global Chief People Officer;**
- **Legal Manager.**

The Committee was formally established by resolution of the Board of Directors of Arcese Trasporti S.p.A. and has the task of analysing all the whistleblowing reports received by itself and by the Italian companies of the Arcese Group, as well as carrying out coordination with the local representatives for the reports received from foreign companies. All under the inter-company contracts in place within the Group.

The Committee - as well as any delegated functions - is appointed "person authorised to process" pursuant to current legislation on the protection of personal data.

It is always the whistleblower's right, when transmitting the whistleblowing report, to exclude one or more

functions as recipient of the report from amongst those authorised.

7.1.1 Activities of the Whistleblowing Committee

The Committee, on a preliminary basis, carries out an assessment regarding the existence of the essential requirements of the whistleblowing report in order to evaluate its admissibility (preliminary investigation). The Committee specifically checks:

- whether or not it falls within the subjective and objective scope of the law (who reported and what they reported);
- the presence of factual elements suitable to justify any further checks or investigations;
- that the report is precise and detailed and, therefore, not generic and not defamatory;
- that any documentation attached to the report is appropriate and consistent.

After having assessed the report as admissible, the Committee carries out the investigative activity necessary to follow up on the report, including through hearings and acquisition of documents, always respecting the principles of impartiality and confidentiality.

In the event of breaches of the Code of Ethics and the Organisation, Management and Control Model, the Supervisory Body, bound to confidentiality, is always involved. Any additional subjects may be involved subject to information and signing of the confidentiality agreement.

Upon completion of the investigation and, in any case, within 3 months from the date of the acknowledgement of receipt (notification), the Committee undertakes to provide feedback to the whistleblower, unless the terms are extended to 6 months if adequately justified.

7.1.2 Filing and storage times

All documentation relating to the reports received is archived within the platform (computer archiving) and stored in compliance with current regulations regarding the protection of personal data.

The documentation relating to the whistleblowing report will be stored for a maximum of 5 years. Personal data that is manifestly useless for the processing of a specific report are not collected or, if collected accidentally, will be immediately deleted.

7.1.3 Reporting

The Committee prepares the Report on an annual basis containing an indication of the Reports received in the reference period.

The Report shows the "status" of each Whistleblowing Report (e.g., received, open, in progress/closed, etc.) and any actions taken (corrective actions and disciplinary measures) in compliance with the rules on the reporting party's confidentiality.

The Whistleblowing Report is sent to:

- the Managing Director of Arcese Trasporti S.p.A.;
- the Board of Statutory Auditors and the Supervisory Body.

7.2 PROTECTION AND LIABILITY OF THE WHISTLEBLOWER

7.2.1 Protection of confidentiality

The identity of the whistleblower, the person reported and the other subjects involved (e.g., facilitator) are protected in every context following the report.

Breach of the obligation of confidentiality is a source of disciplinary liability, notwithstanding any further form of liability provided by law.

Exceptions to the protection of confidentiality:

Express consent of the whistleblower to reveal his/her identity to subjects other than those previously authorised.

In **criminal proceedings**, the identity of the whistleblower is covered by secrecy within the limits of the Article 329 of the Italian Code of Criminal Procedure.

In the **disciplinary proceedings** activated against the alleged perpetrator of the reported conduct, the identity of the whistleblower may be revealed to the person reported to enable his or her defence only with the prior express consent of the whistleblower.

In the management of the whistleblowing report, the personal data of the reporter and other subjects possibly involved will be processed in full compliance with the provisions of current legislation on the protection of personal data, including Regulation **EU 679/2016 ("GDPR")** and **Legislative Decree 196/2003**.

To this end, the Company has carried out a data protection impact assessment (DPIA).

7.2.2. Protection against retaliation

Arcese Trasporti S.p.A., in compliance with legal obligations, has adopted a rigorous anti-retaliation policy. Retaliation will not be tolerated, including, but not limited to, the following scenarios:

- ⇒ **Dismissal, suspension or equivalent measures;**
- ⇒ **Demotion or failure to promote;**
- ⇒ **Change of functions, change of place of work, reduction of salary, modification of working hours;**
- ⇒ **Suspension of training or any restriction of access to training;**
- ⇒ **Notes of demerit or negative references;**
- ⇒ **Adoption of disciplinary measures or other penalties, including pecuniary penalties;**
- ⇒ **Coercion, intimidation, harassment or ostracism;**
- ⇒ **Discrimination or, in any case, unfavourable treatment;**
- ⇒ **Failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;**
- ⇒ **Failure to renew or early termination of a fixed-term employment contract;**
- ⇒ **Damage, including to the person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;**
- ⇒ **Improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;**
- ⇒ **Early termination or cancellation of the contract for the supply of goods or services;**
- ⇒ **Cancellation of a licence or permit;**
- ⇒ **Request to undergo psychiatric or medical tests.**

Arcese Trasporti S.p.A. considers the psychological and physical well-being of its employees and collaborators to be fundamental and undertakes to protect any person who makes a whistleblowing report in good faith.

7.2.3 Conditions for benefiting from protections

- ⇒ **Whistleblowers must reasonably believe that the information about the breaches reported is truthful (not suppositions, rumours or news in the public domain);**
- ⇒ **The good faith of the whistleblower is protected even in the event of an inaccurate whistleblowing report due to genuine errors (poor knowledge of the legal rules);**
- ⇒ **The whistleblower must clearly indicate in the subject of the report that it is a whistleblowing report;**
- ⇒ **There must be a close connection or consequentiality between the report and the unfavourable act directly or indirectly suffered by the whistleblower, to constitute retaliation.**

Notwithstanding the specific limitations provided, the protection of the whistleblower is not guaranteed in the

following cases:

- ⇒ ***The penal liability of the whistleblower for the crimes of slander and defamation was ascertained with a first degree sentence, or his or her civil liability for the same crimes in cases of wilful misconduct or gross negligence.***

In the event of ascertainment of responsibility, a disciplinary sanction is also imposed upon the whistleblower or complainant.

8. DISCIPLINARY SANCTIONS

The Organisational, Management and Control Model pursuant to Legislative Decree 231/01, adopted by Arcese Trasporti S.p.A. provides for a disciplinary system which sanctions those who carry out the conduct which is the subject of the report, against those who breach the protection measures of the whistleblower, in compliance with the provisions of the ANAC Guidelines, as well as those who, following a whistleblowing report or complaint to the Judicial or Accounting Authority have been convicted, even if only with a first degree sentence, for the crimes of slander or defamation or have been held liable in civil court for the same crimes with malice or gross negligence. Should any findings emerge from the investigation activities conducted according to this procedure, the responsibility of the Arcese Trasporti S.p.A. staff will be and Group Companies or Third Parties (consultants, collaborators, commercial partners, etc.), violations or offences, the company will act promptly to apply the Disciplinary System.

These sanctions also aim to ensure compliance with whistleblower protection measures and to promote a safe environment for those who decide to report violations or illicit conduct.

9. TRAINING AND INFORMATION

Arcese Trasporti S.p.A. undertakes to provide all interested parties with specific information and periodic training activities.

This procedure is published on:

- the Arcese website;
- the Arxivar system/internal portal/Intranet/bulletin board, etc.

Arcese Trasporti S.p.A. also ensures training for all Group employees, also through the "e-learning" tools with which the Group is equipped (corporate learning).