



Whistleblowing

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1. Introduction

1.1 Purpose

This Procedure, which forms an integral part of the PLC S.p.A. Organisational, Management and Control Model 231/01, aims to:

- regulate the “Whistleblowing” process;
- define the roles, tasks and responsibilities of the persons involved in the aforementioned process.

1.2 Field of application

This Procedure applies to the corporate departments of PLC S.p.A. and to all staff involved in the Whistleblowing process.

The Procedure regulates the following activities:

- ways of Reporting by the employee and / or third party concerning the violation of the PLC Group’s Model 231/01 or Code of Ethics;
- investigation by the Supervisory Body in relation to the Report received;
- Supervisory Body activities following the investigation.

1.3 Regulatory references

External:

- Legislative Decree of June 8, 2001, no. 231 “*Regulating administrative liability on the part of legal entities and companies, associations or bodies which are not corporations, pursuant to art. 11 of the law 29 September 2000, no. 300*”;
- Guidelines for the structure of Organization, Management and Control Models pursuant to Legislative Decree 231/01 issued by Confindustria on March 7, 2002 (updated on March 31, 2014);
- Legislative Decree 196 of June 30, 2003, “*Code regarding the protection of personal data*”, as

amended by Legislative Decree 101/2018 containing “*Provisions for the adaptation of national legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council on April 27, 2016 on the protection of individuals with regard to processing of personal data, as well as the free movement of such data and which repeals directive 95/46 / EC*”;

- Law November 30, 2017, no. 179 “Provisions for the protection of whistleblowers reporting violations or irregularities which they have noticed in the context of a public or private employment relationship”.

Internal:

- Articles of Association;
- Corporate Governance Code;
- PLC S.p.A.’s Organization, Management and Control Model pursuant to Legislative Decree 231/01;
- PLC Group Code of Ethics;
- “The Internal Regulatory System_03” Manual approved by the BoD of PLC S.p.A. on 26/11/2018 and updated on 11/10/2019.

1.4 Definitions, abbreviations and acronyms

In this Procedure, the following terms and expressions have the following meaning:

BoD	Board of Directors
PLC Group Code of Ethics	Document adopted by the PLC Group, an integral part of the Organization and Management Model drawn up pursuant to Legislative Decree 231/01, which defines the set of ethical and social norms with which company representatives must comply.
Legislative Decree 231/01	Legislative Decree June 8, 2001, no. 231 (<i>"Regulating administrative liability on the part of legal entities and companies, associations or bodies which are not corporations, pursuant to art. 11 of the law 29 September 2000, no. 300"</i>) and subsequent amendments and additions
Legal and Corporate Affairs Division	Entity responsible for the business process
HSEQ	Health, Safety, Environment and Quality Division
Model 231/01 or Model	Organization, Management and Control Model adopted pursuant to Legislative Decree 231/01
Supervisory Body or SB	Is the body with responsibility for checking and supervising the effectiveness and adequacy of Model 231/01
RDIV	Head of the Division or area in which the perpetrator of the ascertained misconduct, of the violation or of the irregularity is employed
RHR	Head of Human Resources Division
Whistleblower	The person who reports misconduct or violations of the Model as indicated in para. 5.2 of this Procedure
Report(s)	The report sent by the employee and / or third party concerning the violation or probable violation of Model 231/01 or of the PLC Group Code of Ethics
Company	PLC S.p.A.
Whistleblowing	The reporting system of offences or violations of Model 231/01 adopted by PLC S.p.A.

2. General reference principles

In performing the activities governed by this Procedure inspiration must be drawn from all the regulations and reference documents mentioned above, as well as from the behavioural principles provided for in the PLC Group Code of Ethics and in the Model that the Company has adopted pursuant to Legislative Decree 231/01.

3. Foreword

Law November 30, 2017, no. 179 containing “*Provisions for the protection of whistleblowers reporting violations or irregularities which they have noticed in the context of a public or private employment relationship*” has provided for a system of protection for both workers belonging to the public sector and for private sector workers and for third parties who report a misconduct of which they have become aware through their work.

In particular, the aforementioned Law, by adding the new paragraphs *2 bis*, *2 ter* and *2 quater* to art. 6 of Legislative Decree 231/01, also introduced certain safeguards for the private sector (e.g. prohibition of retaliation or discrimination for reasons connected, directly or indirectly, with the whistleblowing, etc...) regarding top management and / or their subordinates who report unlawful conduct, relevant pursuant to Legislative Decree 231/01 or violations of the related Model 231/01, of which they became aware due to their office.

To this end, the organization and management Model adopted pursuant to Legislative Decree 231/01 provides for, as its eligibility requirement, the implementation of a specific procedure, which is an integral part of this Model 231/01, in order to regulate the aforementioned reporting system of offences and violations of Model 231/01 (so-called *whistleblowing*).

4. Roles and responsibilities

The Company Divisions / roles that are involved in the Whistleblowing process for various reasons are:

- Whistleblower;
- SB;
- RDIV;
- RHR;
- Directors

The *Responsibility Matrix* which associates the relevant division with each activity of the process in question is shown below:

Divisions Activity	Whistleblower	SB	RDIV/Directors	RHR
Sending the Report containing the requirements / elements indicated in clause. 5.4 and in the manner indicated in clause 5.5	X			
Receives the Report and initiates the investigation into the validity and relevance of the Report		X		
Sending communication of the preliminary results to one or more of the persons indicated in points a), b) and c) in clause 5.7 who receive it ¹		X	X (They receive communication)	X (Receives communication)

¹ It should be noted that the SB will communicate the outcome of the assessment to one or more of the entities indicated according to the circumstances of the specific case.

Divisions Activity	Whistleblower	SB	RDIV/Directors	RHR
The entities indicated in points a), b) and c) in clause 5.7 communicate to the SB any measures taken following verification of the misconduct		X (Receives communication)	X	X
Filing paperwork in case of negative outcome and communication to one or more of the entities indicated in points a), b) and c) of clause 5.7 who receive it		X	X (They receive communication)	X (Receives communication)
Verification of groundlessness and existence of wilful misconduct or gross negligence				X
Disciplinary action in the event of a positive outcome of the existence of wilful misconduct or gross negligence by the Whistleblower				X
Preparation of periodic reports on the Whistleblowing received and on the results of the verifications as well as the cases of archiving		X		

5. Description of activities related to Whistleblowing

5.1 Purpose and field of application

Whistleblowing is a reporting system with which a person operating on behalf of the Company contributes or can contribute to highlighting risks and / or situations potentially prejudicial for the same Company. The main purpose of *Whistleblowing* is therefore to manage any reports in order to identify any problems that could arise from significant corporate misconduct relevant pursuant to Legislative Decree 231/01.

Approved by the Board of Directors of the Company, this Procedure therefore regulates, also through operational indications, the process of sending, receiving, analysing, processing and managing of Reports of illegal conduct, that is relevant pursuant to Legislative Decree 231/01, as well as of the violations of the related Model 231/01, transmitted by the *Whistleblower*. This document also governs the ways of protecting the Whistleblower's confidentiality to avoid possible retaliation against him.

This procedure applies to any Report made by top managers as well as by persons subject to the direction or supervision of one of the top managers as well as to third parties better identified in the following para. 5.2, through the appropriate communication channels, indicated below, reserved and made available by the Company for the above purposes.

5.2 Persons who can make the reports and subject of the Report

The members of the Board of Directors, employees and third parties can report, in accordance with this Procedure, the illegal conduct referred to in Legislative Decree 231/01, relevant in criminal and / or disciplinary cases, or violations of the Model and / or procedural body of which they have become aware, directly or indirectly and also randomly, whilst carrying on their tasks.

Therefore, any behaviour / action that may jeopardize the suitability of the Model, perpetrated by the persons indicated above in the interest or for the benefit of the Companies, may be subject to a Report, which may be, even only potentially:

- a misconduct that combines one or more types of crime for which the Company may be liable pursuant to Legislative Decree 231/01;
- a conduct that, while not including any of the aforementioned types of offences, was in violation of the provisions of the Model (and of the Internal Regulatory System) and of the PLC Group Code of Ethics².

² It is understood that the encouragement to report any offences of which one has become aware through work does not

mean, nor does it presuppose, that the Company employee or collaborator is tacitly or implicitly authorized to carry out “investigations”, especially if improper or illegal, to collect evidence of misconduct in the workplace.

The Reports that determine implementing this Procedure must be based on factual, precise and concordant elements. Therefore, Reports concerning personal issues of the reported party (unless there are aspects that have an impact on a company level), claims or requests relating to the discipline of the employment relationship or relations with the line manager or colleagues are not worthy of protection. Therefore, by way of example but not limited to, the Reporting procedure, with the related protections, will not be started, even if the Report will be sent / delivered using the methods provided for in this document, under the following circumstances:

- an unsubstantiated Report that does not allow reasonable identification of sufficient facts to initiate an investigation (e.g.: *i*) offence committed, *ii*) reference period, *iii*) causes and purposes of the offence, *iv*) persons / units involved etc....) or Reports based on mere suspicions or rumours³;
- unfounded Reports, made for the purpose of damaging or causing harm to the reported person(s).

The requirement of the truthfulness of the reported facts and / or situations remains therefore, to protect the reported person.

Anonymous Reports, i.e. without elements that allow their author to be identified, even if delivered using the methods provided for in this document, may be taken into consideration for the purposes of this Procedure if they have the elements indicated above. Anonymous Reports will only be taken into consideration for further checks if their content is adequately detailed and substantiated.

The pursuit of interest in suitability with the Model, which the Company intends to pursue with this Procedure, pursuant to art. 3 of Law 179/2017, constitutes just cause for disclosure of information covered by secrecy obligations, with reference to the types of crime referred to in Articles 326 of the Italian Criminal Code (Disclosure and use of official secrets), 622 Criminal Code (Disclosure of professional secrets) and 623 Criminal Code (Disclosure of scientific or industrial secrets), as well as in relation to the employee's loyalty obligation pursuant to art. 2105 Civil Code. This disclosure clause does not apply, however, if the obligation of professional secrecy refers to a professional consultancy or assistance relationship or if the disclosure was carried out in ways that exceeded the purposes of eliminating the offence, with particular reference to compliance with the communication channel specifically set up for this purpose.

³ In this regard, considering the spirit of the provision - which is to encourage the collaboration of those who work within the Company for

the purpose of the emergence of corrupt or illegal occurrences - it is not necessary for the Whistleblower to be certain of the actual event (or of the illegal nature) of the reported facts and / or of their author, it being sufficient that the Whistleblower, based on his knowledge, considers it highly probable that a fact has occurred and that this could constitute a misconduct.

5.3 Recipient of the Report

As part of the more general system of information flows referred to in para. 4.7 of the General Part of the Model adopted by the Company and available on the institutional website, the recipient of the Report is the Company's Supervisory Body.

Reports sent to different parties may not be treated in the same way as this Procedure given the exclusive authority of the SB to receive the Reports subject of this Procedure.

On this point it needs pointing out that, as provided in the General Part of the Model, if the Report is not correctly sent to the Supervisory Body, it must be promptly forwarded by the erroneous recipient to the SB, so that it can evaluate the Reports and establish any initiatives.

The SB ensures the confidentiality of the information contained in the Reports and to protect the identity of the Whistleblowers by acting in such a way as to guarantee them against any type of direct or indirect retaliation or discriminatory behaviour, for reasons connected with the Reports.

5.4 Contents of the Reports

The person making the Report must provide all the useful and necessary elements to allow the SB to conduct an investigation by carrying out the necessary checks and verifications in order to assess the admissibility and validity of the Report. The Report must contain the following elements:

- a) the details of the Whistleblower with indication of the position and / or role / activity carried out within the Company (details that will be kept confidential by the SB);
- b) a clear and complete description of the precise and congruous facts that are the subject of the Report that constitute or may constitute a significant offence for the purposes of Legislative Decree 231/01 and / or a violation of the Model and / or PLC Group Code of Ethics;
- c) if known, the time and place in which the facts covered by the Report were committed;
- d) if known, the details or other elements that make it possible to identify the person and / or persons who created the reported facts (for example, position held and area in which the activity is carried out);
- e) an indication of any other persons who can amplify on the reported facts;
- f) an indication of any documents that can back up the validity of the reported facts;
- g) any other information that can provide useful feedback on the existence of the reported facts and in general any other information or document that may be useful to understand

the reported facts.

For the above purposes, the form referred to in Annex A of this Procedure must be used, it being understood that in any case the SB, during the investigation, may request any additional documentation from the Whistleblower which it deems appropriate or necessary in support of the Report.

5.5 Reporting Method

In order to facilitate sending and receiving the Reports, the Company arranges the following alternative communication channels:

- a) communication sent via encrypted e-mail⁴, outside the company servers, to the address dedicated to *Whistleblowing*, managed exclusively by the Supervisory Body, to protect the Whistleblower's confidentiality containing the identification data (part I of the form referred to in Annex A) of the Whistleblower: whistleblowing.odv.plc.spa@gmail.com
- b) letter or note delivered in a sealed envelope addressed to the Company's registered office in Via Lanzone 31, 20123 - Milan, in a sealed envelope to the kind attention of the Supervisory Body with the words "PERSONAL CONFIDENTIAL"; another envelope must be included inside the envelope containing the Report, which may contain the identification data (part I of the form referred to in Annex A) of the Whistleblower. The registry office of the Company must absolutely not open the envelope and the registry signature is made on the closed envelope. This envelope must be promptly delivered to the SB and kept and filed by it under its own responsibility.

5.6 Report Management

The Whistleblowing process ensures the confidentiality of the identity of the Whistleblower from the time the Report is received and at each subsequent stage and also when the SB meetings are recorded, as well as the protection of personal data relating to the Whistleblower, including pursuant to current legislation on the protection of personal data.

⁴ The email address indicated guarantees encryption with standard Transport Layer Security (so-called TLS) an encryption which prevents messages from being intercepted by third parties while they are in transit. TLS is a protocol that applies encryption and provides mail securely, both for incoming and outgoing traffic, helping to prevent messages from being intercepted during the passage between mail servers, ensuring their privacy while they are being transferred between two email providers. **It should be noted that the messages are encrypted only if the sender's e-mail address supports the Transport Layer Security protocol.**

The Whistleblower's identity can only be revealed and disclosed in the cases referred to in the following clause 5.8.a, in compliance with and within the limits of Legislative Decree 196/2003, Privacy Code (see art.2 - undecies, para. 1, letter f of Legislative Decree 196/2003) as amended by Legislative Decree 101/2018 containing provisions for the adaptation of national legislation to the provisions of the GDPR.

5.7 Checking the validity and relevance of the Report

The investigation into the validity and relevance of the Report is conducted independently by the SB in compliance with the principles of impartiality and confidentiality and in compliance with labour law and privacy legislation; being in charge of verifying and managing the Report, the SB can carry out any activity deemed appropriate in order, inter alia, to:

- assess the seriousness of the offences, violations and irregularities reported and assume on their potential prejudicial consequences;
- identify the activities to be carried out in relation to the issues reported with reference to the Model;
- check that the misconduct and / or irregularity has actually been committed, for example assessing the opportunity to:
 - convene the Whistleblower for further clarification;
 - convene the persons who are indicated as persons informed of the facts in the Report;
 - acquire useful documentation or take action to find and acquire it;
 - convene, where deemed appropriate, the person indicated in the Report as the author of the misconduct (reported);
- where necessary, identify the precautions to be taken immediately in order to reduce the risk of adverse events or verified or ascertained events similar to those reported.

In the Whistleblowing investigation, the SB can avail itself of the support and collaboration of the divisions and offices of the Company (and in particular the RHR) or external consultants and without prejudice to the maximum guarantee of confidentiality.

If when the investigation is over the Report should be founded and relevant pursuant to Legislative Decree 231/01, the SB will communicate the outcome of the assessment to one or more of the following persons in relation to the circumstances of the specific case:

- a. to the person in charge of the area in which the perpetrator of the ascertained offence,

violation or irregularity is employed;

- b. to the RHR;
- c. to the Directors;

in order to assess the reported case and adopt any necessary measures.

The persons referred to in the previous letters a), b) and c) will, in turn, inform the SB about any measures taken following the ascertainment of the offence, of the violation or of the irregularity reported.

In the event that at the outcome of the investigation, the Report should not be relevant for the purposes of Legislative Decree 231/01 or for the purposes of the provisions contained in the Model, the Supervisory Body will forward the Report received to the relevant company division and in cases where it is not possible to unequivocally identify the relevant company division, it will send it to the RHR .

If, however, at the outcome of the investigation, the Report is unfounded or irrelevant, the SB will file it (specifying the relative reasons) and this decision is communicated to the persons referred to in the previous letters. a), b) and c); the relevant bodies and / or divisions may take action against the Whistleblower in accordance with the provisions of the following clause 5.9. In the event that the Report concerns an offence already subject to criminal proceedings, the investigation referred to in this Procedure will remain suspended until the verdict is defined.

The SB also ensures the preparation of a periodic report, contained in the reports referred to in clause 4.7.2 of the General Part of the Model adopted by the Company, on all the Reports received, on the results of the checks relating to these Reports as well as on those filed, taking care to keep the identification data of the Whistleblower confidential, unless this data has not already emerged in other ways or in any case is not already known.

In order to ensure the correct management and traceability of the Reports and the related investigation, in compliance with the security and confidentiality standards the SB archives all the documentation relating to the Report received for at least 5 years from the conclusion of the procedure, the management and results thereof (email, communications, expert opinions, minutes, attached documentation, etc.).

5.8 Protection of the Whistleblower

- a) Confidentiality obligation

Except for cases in which, once the investigation has been carried out, there could be a liability for slander or defamation pursuant to the Criminal Code or art. 2043 of the Civil Code and in the event in which confidentiality about personal details is not legally enforceable (e.g. criminal, tax or administrative investigations, inspections by control bodies), the identity of the Whistleblower is protected at every stage the Whistleblowing is being processed. Therefore, except for the above exceptions, the identity of the Whistleblower cannot be revealed without his authorization and all those who receive or are involved in managing the Whistleblowing are required to protect the confidentiality of this information.

b) Ban on discrimination

Persons who report, in accordance with this Procedure, unlawful conduct or violations of Model 231/01 for which they have become aware due to their office, cannot be fined, fired, countermanded, replaced, transferred or subjected to any discriminatory measure for reasons directly or indirectly connected with the Whistleblowing. Discriminatory measures mean unjustified disciplinary actions, harassment in the workplace and any other form of retaliation and / or unfavourable reaction to the Whistleblower.

If they believe that the Whistleblower has suffered or is undergoing a discriminatory measure, the Whistleblower and the trade union organization indicated by the same provide detailed information of the discrimination that has occurred to the Supervisory Body so that it can assess its validity as well as to the National labour Inspectorate for the relevant measures.

In the event that the Supervisory Body deems there is a valid case of discrimination, - with the help of the RHR - it evaluates possible action to be taken by the competent bodies and / or divisions of the Company to restore normality and / or to remedy the negative effects of discrimination and, if necessary, have the perpetrator of the discrimination prosecuted under disciplinary and / or criminal proceedings.

The retaliatory or discriminatory dismissal of the Whistleblower is in any case void, like the change of duties pursuant to art. 2103 of the Civil Code, as well as any other retaliatory or discriminatory measure adopted against the Whistleblower following the Whistleblowing. It is the responsibility of the employer, in case of disputes related to the imposition of disciplinary sanctions, or to demotions, layoffs, transfers, or subjecting the Whistleblower to another organizational measure having direct or indirect negative effects on the working conditions, subsequent to the submission of the Report, to demonstrate that these measures are based on reasons unrelated to the Report.

In any case, the violation of the confidentiality obligation and / or of the ban on discrimination as above is a source of disciplinary responsibility also according to the provisions of the disciplinary

system adopted pursuant to the General Part of Model 231/01 adopted by the Company (see clause 5) and Legislative Decree 231/01, except for other forms of liability provided for by the regulation.

5.9 Responsibility of the Whistleblower

The Whistleblower is aware of the civil and criminal responsibilities and consequences envisaged in the event of false declarations and / or the creation or use of false documents. In the event of abuse or falsity of the Report, any eventual liability of the Whistleblower for slander, defamation, moral damage or other civilly or criminally relevant damage remains.

If, following internal audits, the Whistleblowing turns out to be unfounded, the RHR will carry out checks on the existence of serious guilt or wilful misconduct regarding the unfair Report and, consequently, if so, disciplinary actions will be taken, also in accordance with the sanctioning system adopted pursuant to Model 231/01 (clause 5) and Legislative Decree 231/01 and / or criminal complaints against the Whistleblower unless this does not produce further elements in support of his / her Whistleblowing Report.

6. Filing documentation

All supporting documentation relating to the activities described in this Procedure, paper and / or electronic (i.e. e-mail), must be correctly filed in archives, for the duration provided for by the law in force, in order to allow the correct traceability of the entire process and to facilitate any subsequent checks.

The documentation relating to any disciplinary actions indicated in clause 5.9 will be archived in paper form in a special folder and digitally inside a file catalogued on the Company' server, used and accessible only by the Human Resources Division.

7. Governance of the Procedure and Whistleblowing system

Responsibilities in terms of updating, amendment, approval, distribution and conservation of the Procedure lie with the Head of the Organizational Division, the Head of Legal and Corporate Affairs and the HSEQ Division.

All those who come to know directly or indirectly of facts and / or behaviours that do not comply with the provisions described, must make a Report directly to the Supervisory Body through the channels provided by Model 231/01.

In detail:

a. if the circumstances arise:

- not expressly regulated by the Procedure;
- which lend themselves to dubious interpretations / applications;
- such as to give rise to objective and serious difficulties in applying the Procedure;

each Company employee is required to express them promptly to the Head of Legal and Corporate Affairs;

b. all those - on the other hand - who become aware directly or indirectly of facts and / or conduct that do not comply with the provisions described, must make a Report to the Supervisory Body.

For more details on the system for detecting offences and reporting to the Supervisory Body, refer to what is defined in Model 231/01.

8. Annexes

Annex A: form for sending the Report

Annex A
Form for reporting illegal conduct or violations of the Model pursuant to Legislative Decree
231/01

Part I - Whistleblower Details

Whistleblower Name:	<input type="text"/>																				
Whistleblower Surname:	<input type="text"/>																				
Tax Code:	<table border="1"><tr><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td></tr></table>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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Actual position:	<input type="text"/>																				
Actual Organizational Division:	<input type="text"/>																				
Role at the time of the reported deed:	<input type="text"/>																				
Organizational Division at the time of the deed:	<input type="text"/>																				
Telephone:	<input type="text"/>																				
Email:	<input type="text"/>																				

Part II - Details and information of the unlawful or offending conduct of the Model 231/01

Company / Headquarters/ Plant or where the deed occurred:	<input type="text"/>
Period in which the deed occurred:	<input type="text"/>
Date on which the deed occurred:	<input type="text"/>
Physical place in which the deed occurred:	<input type="text"/>
Person that committed the deed: Name, Surname, Position (several names can be included)	<input type="text"/>
Any third parties involved or aware of the facts (Name, Surname, position, contact number):	<input type="text"/>
How they became aware of the deed:	<input type="text"/>
Area / organizational division the deed may refer to:	<input type="text"/>
Existence of any reports of the fact (where known) to the public authority:	<input type="text"/>
“Other”, specify	<input type="text"/>

Description of the deed: