

TOLERANCE ZERO



REPORT ILLICIT AND DISCRIMINATORY ACTS WITH WHISTLEBLOWING



WHO CAN REPORT?

All persons in possession of information regarding the commission or suspected commission of violations, including workers, collaborators, partners, customers, suppliers of products or services, consultants, and others, ...



WHAT TO REPORT?

Violation or suspected violation of laws and regulations. By way of example, but not limited to, irregularities may be reported regarding: corruption, money laundering, violations of financial sanctions legislation, harassment, bullying, fraud, improper use of confidential customer or company data, as well as violations of the Code of Ethics and company protocols, including those relating to gender equality.



WHY REPORT?

Reports made in good faith allow for timely intervention, correcting illicit behavior or other non-conformities that could damage the interest and reputation of HEMINA.



HOW TO REPORT?

Reports must be sent through the dedicated channels indicated below:

- <https://ethicpoint.eu/hemina/>
- PO BOX n. 301 c/o Mail Boxes Etc., - MBE Center 0197 Post office box address (Via Cenisio 37, 20154 Milan): Audit People S.r.l – Società Benefit – Indicating the name of the Organization and, if applicable, the double envelope procedure.
- Toll-free number 800 985 231 with voice messaging (valid for Italy only).



CONTENT OF THE REPORT?

The report must be detailed and contain all the information necessary to allow verification of the reported facts. It is important to provide a complete description of the event, specifying the period or time and place in which it occurred, as well as indicating the personal details or other elements useful for identifying the person or persons involved. Any additional information that can contribute to an objective assessment of the facts is highly recommended.



WHAT HAPPENS ONCE THE REPORT IS RECEIVED?

If there are grounds to initiate an investigation, a group composed of internal and external members - with adequate skills, independence and absence of conflicts of interest - will verify the validity of the reported facts. Furthermore, the group will keep the reporter informed on the status of the activities, providing updates such as confirmation of receipt and verification feedback.



REPORTS AND PRIVACY GUARANTEE

Reports can be made anonymously or by name. In both cases, the confidentiality of both the identity of the subjects involved and the facts reported, as well as the identity of the reporter, is guaranteed.



PROHIBITION OF RETALIATORY OR DISCRIMINATORY ACTS

All HEMINA Persons are expressly prohibited from engaging in acts of retaliation or discrimination against the Reporter or other individuals directly or indirectly connected to the report.



ILLICIT REPORTS

In the case of reports made in bad faith, with the intent to offend or damage the honor and personal or professional reputation of other people (so-called illicit reports), disciplinary sanctions and/or other measures will be imposed on the Reporting Person.

For further information, please consult the “Whistleblowing Policy” on the Site.

HEMINA SPA

