
PROCEDURE FOR REPORTING CRIMES (SO-CALLED “WHISTLEBLOWING”)

Introduction

On 15 November 2017, the Italian Chamber of Deputies definitively approved the so-called “Whistleblowing Bill” (which was published in the Official Gazette, on 14 December 2017).

Approval of the Whistleblowing Bill sanctioned the extension of the group of subjects obliged to have a Whistleblowing system, modifying Art. 6 of Italian Legislative Decree No. 231/2001 (hereafter referred to as the “Decree”).

The company intends comply with the regulations contained in the Whistleblowing Bill.

1. Reporting crimes

In accordance with the aims of the Code of Ethics, all employees and members of the company's corporate bodies undertake to collaborate with the Chairperson of the Board of Auditors (reporting to him, in writing and anonymously, any violation or suspicion of violation of rules of law within the company), or with clients or suppliers.

The Chairperson of the Board of Auditors will analyse the report, and, if necessary, listen to the person reporting and the person responsible for the presumed violation.

This approach (which is in line with the instructions on protecting the employee or collaborator who reports the crime, in the private sector) allows the subjects indicated in Art. 5, Paragraph 1, points a) and b) of the Decree, to make detailed reports, in order to protect the integrity of the company, of illegal conduct, based on precise and concordant elements that they have learnt about as a result of the functions carried out; this channel to the Chairperson of the Board of Auditors guarantees confidentiality over the identity of the person reporting while the report is being handled.

For this purpose, an email address, segnalazionitexno@caravatipagani.it, has been set up, to report violations or simply suspected violations of laws.

2. Whistleblowing

With reference to what is contained in paragraph 1 above, all acts of retaliation or discrimination, be they direct or indirect, against the reporting party, for reasons linked, directly or indirectly, to the report, are forbidden.

The following sanctions, which are contained in the National Collective Bargaining Employment Contract, will be applied against anyone that violates the measures to protect the reporting party, and against anyone that, with malice or with gross negligence, makes reports that prove to be unfounded:

- verbal warning;
- written warning;
- fine;
- suspension from work and from pay;
- lawful dismissal for misconduct;
- dismissal with objective justification;



- dismissal for justified subjective reasons.

It is noted that the adoption of discriminatory measures against individuals who make reports may be reported to the National Labour Inspectorate, for them to take appropriate measures, as well as to the reporting party, and the trade union organisation indicated by the Inspectorate.

It is emphasised that retaliatory or discriminatory dismissal of the reporting party has no value. Furthermore, variation of work also has no value, in accordance with Art. 2103 of the Italian Civil Code, and neither does any other retaliatory or discriminatory measure adopted against the reporting party. In the event of disputes linked to the imposition of disciplinary sanctions, or to demotions, dismissals, transfers, or subjection of the reporting party to another organisational measure that has direct or indirect, negative effects on the conditions of employment, following the presentation of a report, it is the duty of the employer to demonstrate that these measures are founded on reasons that have nothing to do with the report itself.

Briga Novarese, 20/04/2018

Texno S.r.l.
A handwritten signature in blue ink, appearing to read "Giovanni Geronzi", written over the printed name "Texno S.r.l.".