CHECK	APPROVAL
SGI -	PRE -

REV.	DATE	DESCRIPTION
0	30/03/2022	First issue – this replaces the previous procedure P4.01
1	10.10.2022	Procedure code changed from P-Segnalazioni Sa8000 and SSL-01 to P-Segnalazioni-01. Integration UNI/PDR 125:2022
2	14.07.2023	Merges and replaces P-Administrative Responsibility-02 231 and anti – corruption reporting procedure. Name changed in Ordinary Reports
3	29.03.2024	Updated § 3.1 SA8000 Reports

SUMMARY

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1. PURPOSE

The purpose of this procedure is to provide the reporting party with clear, precise and concise information regarding the methods of carrying out and transmitting ordinary reports or all reports, even anonymous ones, which **do not fall** within the scope of the legislation relating to Whistleblowing, pertaining to Legislative Decree 24/2023, specifying for this purpose how the latter are regulated and governed by a different procedure adopted by the company and called P-Reports-02 Whistleblowing.

2. APPLICATION'S FIELD

All workers and all interested parties can communicate findings and suggestions (not falling within the scope of the aforementioned whistleblowing legislation), regarding the Management Systems, with particular reference to aspects relating to Social Responsibility (SA8000), Health and Safety at work (ISO 45001 and Legislative Decree 81/08), Gender Equality (UNI/PdR 125), and anti-corruption (ISO 37001). Furthermore, the procedure is applied to report the commission or attempted commission of one of the crimes provided for by the Legislative Decree. 231/01 or the fraudulent circumvention of the principles and provisions of the Organizational Model and/or of the ethical values and rules of conduct of the company's Code of Ethics by subjects who do not benefit - as they are not referred to by the Whistleblowing Decree - or they do not want to enjoy the protections provided and regulated by the Legislative Decree. 24/2023.

3. REPORT MANAGEMENT

COMMUNICATIONS/REPORTS CAN BE ANONYMOUS OR SIGNED AT WILL.

3.1. SA8000 REPORTS

Standard SA 8000 provides for that workers and interested parties can report any problems or suggestions regarding its contents, in general, and their application in the Cooperative.

DIRECTED TO THE COMPANY

- Tel. 055-6527014/349-3355906
- Fax. 055-691379
- E-mail matilde.delliguanti@cooplat.it
- Ordinary Mail Via L.F. Menabrea 1, 50136 – FIRENZE (the envelope must have the words **"to the attention of the Social Performance Team"**)
- Internet website https://www.cooplat.it Social Responsibility/SA8000 section using the appropriate form (**report can be anonymous**)

DIRECTED TO RAPPRESENTANTI DEI LAVORATORI

Contact details of the workers' representatives can be found in the specific communication sent by email.

BOXES/CONTAINERS FOR ANY ANONYMOUS REPORTS

AREA	ADDRESS
FLORENCE	Via Luigi Federico Menabrea, 1
SIENA	Via B. Tolomei, 9b
LIVORNO	Via Grotta delle Fate, 19
PIOMBINO	Lungomare Marconi, 220

In case of communications deposited in the boxes, it is the Social Performance Team (through a delegated person) who has the task and responsibility of managing their opening at least monthly. For this purpose they will receive the keys to the containers dedicated to this function.

DIRECTED TO SGS CERTIFICATION BODY

- E-mail: sa8000@sgs.com (anonymous mailbox)

DIRECTED TO SAI

- Ordinary Mail SAI: SAAS, 220 East 23rd Street, Suite 605, New York, NY 10010 USA
- E-mail: saas@saasaccreditation.org
- Fax: fax+212-684-1515

Reports received will be logged in the GDS "Report Management" form and handled by the Social Performance Team. When necessary, the team will involve the Integrated Management Systems Manager, relevant departments, and Company Management, in accordance with the procedures defined in the Management Systems Manual.
In addition to facilitating communication with the Integrated Management Systems Manager, the Social Performance Team is responsible for monitoring the handling of the issue by the relevant department and assisting in verifying the closure of the issue, complaint, or suggestion within the GDS system.
Managing these reports may involve—in addition to the departments listed above—site visits to the location where the complaint originated, staff interviews, analysis of documents and records (e.g., sign-in sheets, payslips, contracts, etc.), potential involvement of trade unions, and any other actions deemed necessary.
Workers must be informed about the status of the report, ideally within 30 days of its receipt. If the matter cannot be resolved within this timeframe, workers will be updated on the progress and actions taken 30 days after the report was received. In the case of anonymous reports, a notice will be posted at the work site and on the cooperative's website.
If necessary, a corrective or improvement action may be required to address a reported issue. The status of SA 8000 reports received and deemed "relevant" by the Social Performance Team will be communicated periodically.
Communications and reports may be submitted anonymously or signed, at the individual's discretion.

3.2. HEALTH & SAFETY REPORTS

DIRECTED TO THE COMPANY

- Tel: 055 6527011 |
- Fax: 055 691379
- e-mail: info.centralino@cooplat.it
- Posta: *COOPLAT,* Via Menabrea n° 1 - 50136 FIRENZE
  (the envelope must have the words "**to the attention of the Prevention and Protection Service Manager**")

DIRECTED TO WORKERS' REPRESENTATIVES FOR SAFETY

Contact details of the workers' representatives can be found in the specific communication sent via email.

DIRECTED TO RSPP AND ASPP

- PREVENTION AND PROTECTION RESPONSIBLE
  - Tel: 055 6527087
  - e-mail: ufficiosicurezza@cooplat.it
- PREVENTION AND PROTECTION SERVICE OFFICER
  - Tel: 0556527030
  - e-mail: ufficiosicurezza@cooplat.it

DIRECTED TO ACCOUNTABLES

Reports may be communicated directly to your relevant person in charge verbally or in written form.
The Person in Charge will then bring the reports received (even anonymously) to the Employer and/or the RSPP.
Communications/reports can be anonymous or signed at will.

3.3. GENDER EQUALITY REPORTING

Anyone who wishes to report in good faith, or on the basis of a reasonable belief, any episodes, behaviours, actions and/or language which are harmful or in any case not respectful of gender equality and any form of non-inclusivity with particular reference to episodes of harassment and mobbing can use the following channels:

DIRECTED TO THE COMPANY

- Tel: 055 6527011
- Fax: 055 691379
- e-mail: uguaglianzadigenere@cooplat.it
- Postal Service: *COOPLAT,* Via Menabrea n° 1 - 50136 FIRENZE
  (the envelope must have the words **"to the attention of the Steering Committee"**)
- Internet Website: www.cooplat.it in the Gender Equality section using the appropriate form (**report can be anonymous**)
- through the channels provided for in point SA8000 specifying that it is a report regarding gender equality

Reports regarding gender equality will be managed by the GUIDANCE COMMITTEE FOR GENDER EQUALITY, registering them on the VDS Form (Reporting Form).
The STEERING COMMITTEE monitors with reasonable frequency that the report is managed in collaboration with the functions involved and certifies the closure of the report on the VDS form.
Reports can also arise during the service control phase (See P-Service provision-01).
Communications/reports can be anonymous or signed at will.

3.4. 231 REPORTS

With regards to violations of the Organizational Model pursuant to Legislative Decree 231/2001, the Whistleblower is allowed to send a report to the Supervisory Body via the following channels:

DIRECTED TO THE COMPANY

- by sending to the e-mail adress: odv231@cooplat.it
- by ordinary mail to the address: COOPLAT, Via Menabrea, 1 – 50136 Firenze – c.a. Supervisory Body
- by means of the internal mail service, by physically depositing the reports in a closed envelope, with the words "confidential/personal", in the OdV report box set up near the stairs on the ground floor of the headquarters in Via Menabrea, 1 Florence
- by filling in the appropriate form on the website www.cooplat.it on the "MODEL 231" page (with the possibility of sending an anonymous report)

Communications/reports can be anonymous or signed at will.

Ordinary reports regarding Legislative Decree no. 231/01 are managed independently by the Supervisory Body which guarantees that the report is correctly verified and the related investigation is conducted in compliance with the relevant legislation.

After the above activities, given the validity of the report, the SB takes its reasoned decision and proceeds to communicate the report and its assessments promptly, within its scope of competence, to the Presidency, the Top Management and at the first possible meeting, to the Board of Directors and/or the Board of Statutory Auditors.

All documentation is archived by the ODV

The Supervisory Body guarantees the confidentiality of the reporting party from the moment the report is taken into account, even in cases where it subsequently turns out to be incorrect or unfounded.

It is also specified that, if the report received by the SB concerns corrupt conduct and/or in any case pertinent and relevant to the ISO 37001 Anti-Corruption Management System adopted by Cooplat, the SB is required to promptly notify the CAC, even where the conduct not relevant pursuant to Legislative Decree 231/2001, in order to coordinate with the same for the management of the report.

3.5. ANTI – CORRUPTION REPORTS

In case of **reports based on reasonable belief, any doubts or suspicions in relation to acts of corruption or any violation or deficiency of the ISO 37001 Anti-Corruption Management System**, any of the indicated above channels dedicated to the ODV may be used, at the reporter's choice. (if it is also relevant pursuant to Legislative Decree 231/01), or the following channels:

DIRECTED TO THE COMPANY

- by sending to the e-mail adress: anticorruzione@cooplat.it
- by ordinary mail to the address: COOPLAT, Via Menabrea, 1 – 50136 Firenze – c.a. Funzione “Conformità Anticorruzione” o CAC
- by filling in the appropriate form on the website www.cooplat.it on the “ANTICORRUPTION” page (with the possibility of sending an anonymous report))

Communications/reports can be anonymous or signed at will.

Ordinary anti-corruption reports are managed by the CAC Function, and the same, once it has received the report directly from the reporter in the manner indicated above, initiates an investigation into the same, making use, depending on their nature, of the internal structures of the company and/or external consultants specialized in reporting, ensuring the confidentiality and - where possible - anonymization of any personal data contained in the report.

After the above activities, given the validity of the report, CAC takes its reasoned decision and proceeds to communicate the report and its assessments promptly, within its scope of competence, to the Presidency, the Top Management, the competent function and at the first meeting possible, to the Board of Directors and/or the Board of Statutory Auditors

All documentation is archived by the CAC.

The report must be recorded by the CAC in the Report of Report (VDS form), specifying that it is a report on anti-corruption. The "Anti-Corruption Compliance" function, depending on the type of report, monitors with

reasonable frequency that the report is managed by the competent function and collaborates in verifying the closure of the report by recording the results on the VDS form itself.
If necessary, corrective action may be requested following the processing of a report (see section 4 Management Systems Manual).

The CAC guarantees the confidentiality of the reporting party from the moment the report is taken into account, even in cases where it subsequently turns out to be incorrect or unfounded.

In the event that the CAC receives a report relating to or in any case such as to induce or presuppose the existence of well-founded suspicions of attempted, presumed or actual acts of corruption and/or in any case relevant facts/activities pursuant to Legislative Decree 231/01 , the anti-corruption compliance function (CAC) promptly informs the Supervisory Body in order to coordinate with it for the management of the report.
Feedback

3.6. PROCEDURE'S GENERAL PROVISIONS: DECLARATION OF NON-RETARIATION, COMMITMENT TO CONFIDENTIALITY, SANCTIONS

Against the ordinary Reporter, **regardless of the object and/or type of ordinary report made**, any form of threat, retaliation or discriminatory measure, sanction, direct or indirect, on working conditions for related reasons is not permitted or tolerated. directly or indirectly to the report. All the various types of reports highlighted in this document are managed guaranteeing maximum confidentiality regarding the identity of the Reporter and all the subjects and facts reported. Furthermore, suitable communication methods are adopted and used to protect the identity of the subjects mentioned in the reports, as well as the confidentiality of the reporting data, avoiding in any case the communication of the acquired data to non-legitimate subjects.

In the event that the subjects and/or functions and/or offices and/or committees/bodies of the cooperative responsible for receiving ordinary reports, as previously detailed in this procedure, receive an incorrect report or one not having as its object the specific matter of competence (or in any case of dubious interpretation), must independently and immediately forward the report to the subjects and/or functions and/or offices and/or committees/bodies deemed competent, having as reference what is regulated by this document and what set out in the paragraph entitled "field of application".

Cooplat also notes that abuses relating to and related to this Procedure entail the imposition of disciplinary sanctions, as well as other sanctions provided for by law, in particular, reports found to be unfounded, made with malice or gross negligence, or those manifestly opportunistic and/or carried out for the sole purpose of harming the reported person or other subjects, and any other hypothesis of improper use or intentional exploitation of this Procedure. The disciplinary sanctions will be proportionate to the extent and seriousness of the illegal behavior ascertained and may also lead to the termination of the relationship, in compliance with the provisions of the law, the applicable CCNL regulations and the Disciplinary System. All confirmed violations of the measures put in place to protect the whistleblower will also be sanctioned in the same way.

4. SUMMARY OF RECALLED DOCUMENTS

Management Systems Manual
VDS Form Reporting Form
GDS Form Reports Management
P Procedure-Service Provision-01
P-Reportsi-02 Whistleblowing.