

PREMISE

Law no. 179/2017 containing "*Provisions for the protection of creators of reports of crimes or irregularities that have come to their knowledge in the context of a public or private employment relationship*" has amended art. 6 of Legislative Decree 231/2001, providing for the implementation of guarantees and protections for those who make reports related to significant illegitimate conducts relevant to Legislative Decree 231/2001, or events or behaviours in violation of the Organization Model, Management and Control (MOGC). NAR SPA, already equipped with a MOGC for Legislative Decree 231/2001, proceeded to adapt the reporting system in use by aligning it with the new regulatory provisions of the afore-mentioned art. 6..

1 - PURPOSE AND RECEIVERS

NAR intends to promote a corporate culture characterized by correct behaviours and a good corporate governance system that promotes transparency, legality and the enhancement of the skills and abilities of the people who work in the company; for this reason, it recognizes the importance of having a Policy governing the Reporting of illegitimate behaviours as defined in the following paragraph 2 (the "**Whistleblowing Policy**").

Any information concerning possible illegitimate behaviours transmitted to those entities responsible for its collection by the receivers of the present policy as described below is considered as "Reporting".

Therefore, this *Policy* defines adequate communication channels for the collection, analysis and treatment of Reports of Illegitimate Behaviours within the company.

The purpose of this *Policy* is to ensure a work environment in which Employees can serenely report Illegitimate Behaviours conducted within the company.

This *Policy* must be known, respected and adopted by the following subjects: NAR employees, members of NAR's corporate bodies, customers, suppliers, consultants and more generally anyone who is in a relationship of interest with the company (collectively, the "Receivers of the policy").

NAR is committed to illustrating the internal reporting process and this *Policy* to Employees in a clear, precise and complete manner, indicating the measures in place to guarantee the confidentiality of the personal data of the reporting person and the alleged person responsible for the violation.

NAR appoints a Reporting Manager who ensures the correct functioning of the system and reports directly and without delay to the Supervisory Body and, in the case of reports that may be significantly relevant to specific responsibilities, to the Board of Statutory Auditors. The Reporting Manager can also be a subject external to the company, provided that he/she has the adequate professional skills.

The role of Reporting Manager is entrusted to the Head of the Human Resources department.

2 - ILLEGITIMATE BEHAVIOUR

Illegitimate Behaviour means any action or omission, which occurred in the performance of the work/business activity or which has an impact on it, which may constitute violations of the rules governing such activity, or which in any case causes or may cause damage or prejudice to the company and/or to the Receivers of the policy and that:

- **is unlawful, incorrect or immoral;**
- **violates the normative and regulatory provisions (e.g. Legislative Decree 231/2001); or**

- **does not comply with internal regulations (e.g. Code of Ethics, MOGC, procedures and operating instructions).**

3 - PROCEDURES FOR SUBMITTING REPORTS

In the event that a Receiver of the policy has reasonable suspicion that an Illegitimate Behaviour has occurred or may occur, he is free to deliver a Report in the manner described below.

If the Report concerns the Reporting Manager, the Receiver of the policy may directly contact a member of the NAR Supervisory Body.

In the event that a Receiver of the policy has doubts regarding the classification of a conduct as legitimate or not, he/she can contact the NAR Supervisory Body for the necessary clarifications.

Reports must be submitted in writing using one of the following channels:

1. by e-mail to the following address: violazioni-231-etica@nar-spa.com with free text;
2. by ordinary mail, in a sealed envelope, to the following address: NAR SPA – Reporting Manager - Via Leonardo da Vinci, 8 - 35020 Legnaro (PD).

The Reports must be detailed and based on precise and factual concordant elements, or on specific violations of the Organization Management and Control Model of NAR of which the Reporter has become aware due to the functions performed, and not by hearsay or mere gossip.

Reports made using the afore-mentioned channels completely guarantee the possible anonymity of the Reporter, being said that the privacy of the Reporter is guaranteed.

The reports made through the portal (n.3) are received simultaneously by the Reporting Manager and by the Company Supervisory Body.

If the Report is not relevant or there is insufficient evidence for the initiation of the investigation, the Supervisory Body informs the Reporting Manager not to consider it and to inform the Reporter that he will not continue in the process of investigating further.

In the event that an Receiver of the Policy makes a Report with false information or ungrounded or made for the sole purpose of damaging or otherwise causing damages to the company or one or more of the Receivers of the Policy, such behaviour will be seriously considered for disciplinary purposes and, if this is the case, punished accordingly.

Furthermore, if the Report appears affected by wilful misconduct or gross negligence, hence to contains also the elements of a crime, the related news will be sent to the competent Public Prosecutor.

The actions to be taken with respect to Reports made with wilful misconduct or gross negligence are resolved by the Board of Directors.

The Company reserves its rights to take action for compensation for the damages caused by the Report.

4 - MANAGEMENT OF REPORTS

The Supervisory Body will carry out a preliminary assessment of the Report received and, should it consider that there are significant elements of a possible Illegitimate Behaviour that justifying the start of an investigation, it will notify the Reporting Manager and the administrative body (if not already involved).

Where possible, Disclosed Reports must be filed. These are those reports from which it is possible to deduce the identity of the Reporter considering that:

- it is more difficult to investigate if it is not possible to find further information from the Reporter;
- it is more difficult to protect the Reporter;
- the risk of a "culture of suspicion" could arise, followed by anonymous, unclear and unreasonable reports.

The Reporting Manager, charged with carrying out the investigation:

- must ensure that it takes place fairly and impartially; this means that, where required by the norm, each person involved in the investigation can be informed of the statements made and the evidence stated against him/her and that he/she is put in a position to be able to counter them;
- may decide to propose the assignment of carrying out the appropriate checks/controls, to third parties.

All interactions will be classified as "CONFIDENTIAL", hence, with maximum level of confidentiality.

The Reporting Manager may choose to use the support of technical consultants (such as, external law firms or professionals) on matters that do not fall within his/her specific competences and can also ask for the support of all Employees;

The Reporting Manager ensures that the investigation is accurate, that it has a reasonable duration and that, where required by law, it respects the privacy of the Reporter and of the people involved, including the subject who is allegedly reported.

The Reporting Manager must keep both the Reported and the Reporter informed on the developments of the investigation.

5 - RESULTS OF THE INVESTIGATION

At the end of the investigation, the Reporting Manager submits a report to the Supervisory Body.

This document must:

- summarize the investigation process and the evidence collected;
- expose the conclusions reached; and
- provide recommendations and suggest actions to be taken to right the violations found and ensure that they do not occur in the future.

The Supervisory Body determines its own evaluation also on the basis of assessments that it believes to carry out personally. The Supervisory Body therefore formulates its own proposals, including the need or not to impose disciplinary measures. In any case, it is up to the administrative body to make the final decision on the imposition of these measures. The Employee who has committed or has been involved in an Illegitimate Behaviour will not be immune from any disciplinary measures for the sole fact of having reported their own or someone else's Illegitimate Behaviour, as per this *Policy*.

However, such circumstance may be taken into consideration in the evaluation of the disciplinary measure to be adopted.

The outcome of the investigation must also be communicated to the reporting entity.

In the event that the Reporting Employee is jointly responsible for the violations, he/she will be entitled to preferential treatment with respect to the other jointly responsible, compatibly with the applicable regulations.

6 - PROTECTION OF THE REPORTER

NAR does not tolerate threats, retaliation and/or discrimination against anyone who, in good faith, reports illegitimate conduct and/or non-compliances with Legislative Decree 231/2001 or other regulations in force.

NAR guarantees the anonymity of the Reporter, except in those cases where:

- the Reporter expresses his/her consent to the disclosure;
- its disclosure is required by law or regulation (for example, if it is necessary to involve the Authorities, or if the reported person has the right to receive notification); or
- its disclosure is necessary to prevent or reduce threats to people's health or safety.

The unauthorized disclosure of the identity of the Reporter, or of information on the basis of which it can be deduced, is considered a violation of this *Policy*.

The guarantees of confidentiality provided by the *Policy* also protect the reported person.

7 - DATA PROTECTION AND DOCUMENT ARCHIVING

The documentation relating to the Reports are confidential and must be archived for a period of two years from the closure of the Report. The documents must be kept within the company in a secure manner, in compliance with the rules in place for the classification and processing of information and in compliance with the norms and regulation and have to be accessible only to Authorized Employees.

This documentation includes at least the name, the identification code and the structure/office of the Reporter (where available), the details of the Reported, the declarations and the activities carried out, the outcome of the investigation and the actions taken.

Only the information for which the local norm or internal regulations of the company require their conservation will be archived.
