

ANNEX NO. 2
Whistleblowing Policy

REPORTING BY ORDINARY MAIL

Submission of report by written form of ordinary mail

The reporting person may send the report by ordinary mail addressed to Team Whistleblowing of Labor Project S.r.l at the following address:

Il Team Whistleblowing di Labor Project,
c/o Labor Project
Via Brianza, n. 65 – 22063 – Cantù (CO)

If the reporting person wishes to disclose his or her identity, in order to guarantee his or her confidentiality and the confidential filing of the report, three sealed envelopes will be necessary:

- the first one, with the identification data of the reporter;
- the second, with the report, so as to separate the identification data of the reporter from the report;
- the third envelope, inside which the two envelopes mentioned above should be placed.

The outer envelope must clearly state:

"confidential - whistleblowing report"

Only in this case, in fact, is it immediately clear to anyone receiving the communication (even if it is, mistakenly, delivered to a person who is not competent), that the report must be handled in accordance with the provisions of Legislative Decree 24/2023, in compliance with confidentiality and protection measures.

Content of the notification

The following data should be indicated in the report

- place where the event occurred;
- subject of the report;
- description of the fact;
- an address to which (i) an acknowledgement of receipt of the report can be sent, (ii) to contact the reporter should clarifications and/or information be required during the investigation (iii) to send the feedback from the investigation.

It is also possible to attach documentation relating to the report in both paper and digital form.

The communication must also specify that it is a "whistleblowing report" stating:

"This is a whistleblowing report pursuant to Legislative Decree 24/2023, therefore, I intend to keep my identity confidential and benefit from the protections provided for in the event of any retaliation".

In this way, in fact, it is immediately clear to anyone receiving the communication (even in the event that it is, mistakenly, delivered to a non-competent person) that the report will have to be handled in accordance with the provisions of Legislative Decree 24/2023, in compliance with the confidentiality and "protection" safeguards of the reporter.

In any case, if such indications are missing, but it is possible to infer from the content of the report that it is a "whistleblowing" report, the whistleblower will be subject to the protection and "protection" measures provided for by the legislation.