

UNIONE FIDUCIARIA

# Comunica Whistleblowing

---

Whistleblowers user manual

Unione Fiduciaria

## Contents

1	Purpose of the document.....	2
2	General Access Portal.....	2
3	Policies.....	2
4	File a new report.....	3
4.1	Select the report type.....	4
4.2	Filling in written report.....	5
4.3	Vocal (or oral) report.....	6
4.4	Data preview.....	7
4.5	Confirmation of submission.....	9
5	Report consultation.....	10
5.1	Example of consultation page.....	10
5.2	Common features of the report consultation page.....	11
5.2.1	Main information.....	11
5.2.2	Passage history.....	11
5.2.3	User Messaging.....	12

## 1 Purpose of the document

This manual describes how to use the web application “*Comunica Whistleblowing*” to make reports pursuant to Law no. 179 of 30 November 2017, regarding “*Provisions for the protection of whistleblowers who report crimes or misconduct of which they become aware in the context of private or public employment*” and (it.) Legislative Decree no. 24 of 10 March 2023 on “*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and containing provisions regarding the protection of persons who report violations of national regulatory provisions*”.

## 2 General Access Portal

Link to the portal:

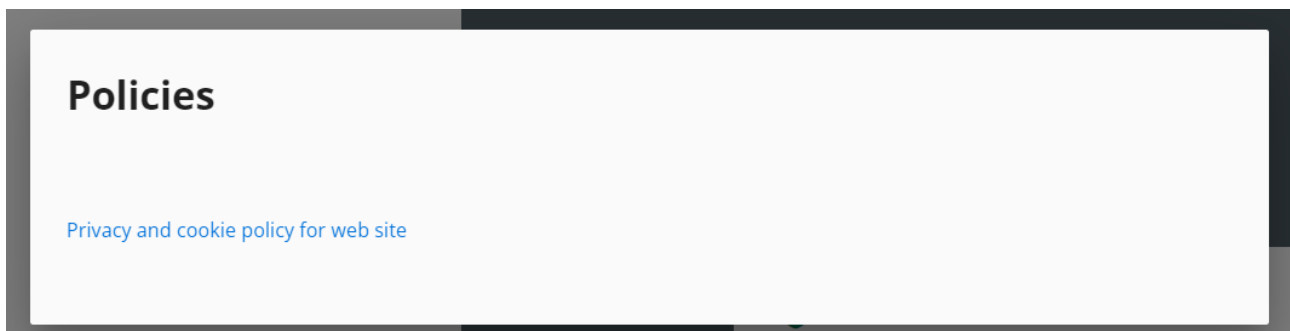
<https://digitalplatform.unionefiduciaria.it/whistleblowingnew/it/accessoprincipale/identificazionegruppo?TOKEN=GRUPPOFINARVEDIWB>

## 3 Policies

All pages have the following symbol



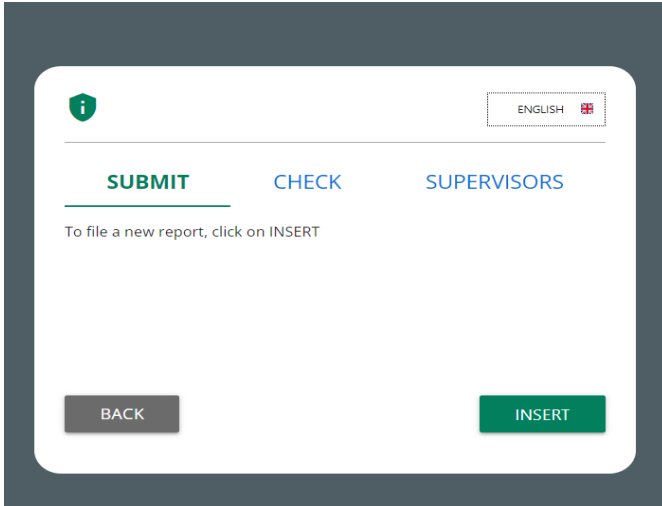
By clicking on this symbol, you will be able to view



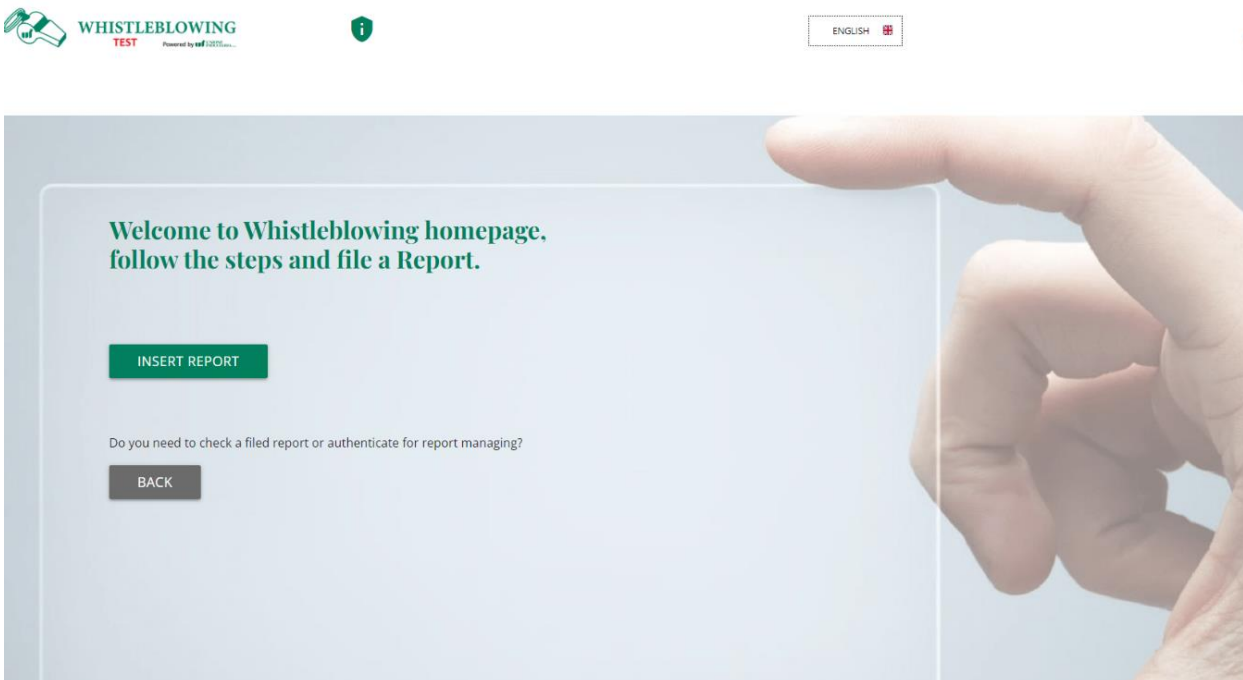
- The Privacy Policy of Unione Fiduciaria, as supplier of the product.
- If applicable, the group/company privacy policy. These documents will not be available in the general access portal as they are customized for each group/company configured for the application.

## 4 File a new report

Click on “INSERT”



You will enter the welcome section, from where you will be able to select the type of reporting.



Click on “INSERT REPORT”.

## 4.1 Select the report type

Follow the instructions, select the desired type of report and click on “CONTINUE”.

### Select report type

Indicate the method to release your report (voice reporting involves the recording of an audio message)

Written

Vocal

[CONTINUE](#)

## 4.2 Filling in written report

Below is an example of a report submission form divided into compilation sections. The fields and number of sections may differ for your company.

The numbers above show the **progress of compiling the reporting sections**.

The buttons at the bottom allow navigation between sections, the back button of the first section instead exits the report compilation and returns to the report type page.

The screenshot shows a web form titled "Fill in your warning" with a progress indicator at the top showing step 1 of 2. The form is divided into two columns of input fields. The left column contains: "Place where this violation occurred\*" (with a red error message "The field is mandatory"), "To which corporate function does the warning refer?\*", "Who are the main parties or individuals involved?\*", "Date and/or time frame in which the events in question occurred\*", and "The conduct is unlawful because it violates:\*" (with a list of radio button options: Code of Ethics, Organizational Model 231, corporate procedures, Regulations regarding health and safety at work, Environmental regulations, Anti-corruption regulations, and Other (to be specified)). The right column contains: "Facts description\*", "Attach any documents relevant to the report" (with a "FILE" button), "Indicate how the auditing body could get these documents", and "Enter additional comments/notes here". At the bottom, there are "BACK" and "CONTINUE" buttons. A note at the bottom left states "Fields marked with \* are mandatory".

The screenshot shows a progress bar at the top with three steps. Step 1 is highlighted in green, and step 2 is highlighted in grey. The main heading is "Final information and notification".

Have you already notified the facts to other authorities and/or persons inside and/or outside the company?

NO  
 YES

Indicates to which authority / function / subject

Do you wish to remain anonymous?

YES  
 NO

Enter your contacts here if necessary

By proceeding, I declare that I have read the Privacy Notice, available on the Company's website\*

I accept

Fields marked with \* are mandatory

BACK CONTINUE

### 4.3 Vocal (or oral) report

If provided by the system, it is possible for the whistleblower to issue a vocal (or oral) report. Unlike the written report, there are no mandatory fields to be filled out; however, it is possible to record the voice message directly from the system through specific function.

An explanation screen on how to activate the function from the different electronic tools will be displayed first.

The screenshot shows a progress bar at the top with three steps. Step 1 is highlighted in green, and step 2 is highlighted in grey. The main heading is "Preliminary Information".

The channel for oral reports provides for the recording of the report directly from the system. To be able to activate the recording it is necessary to **remember to authorize the use of the audio systems (microphone, headphones) from the browser used.**

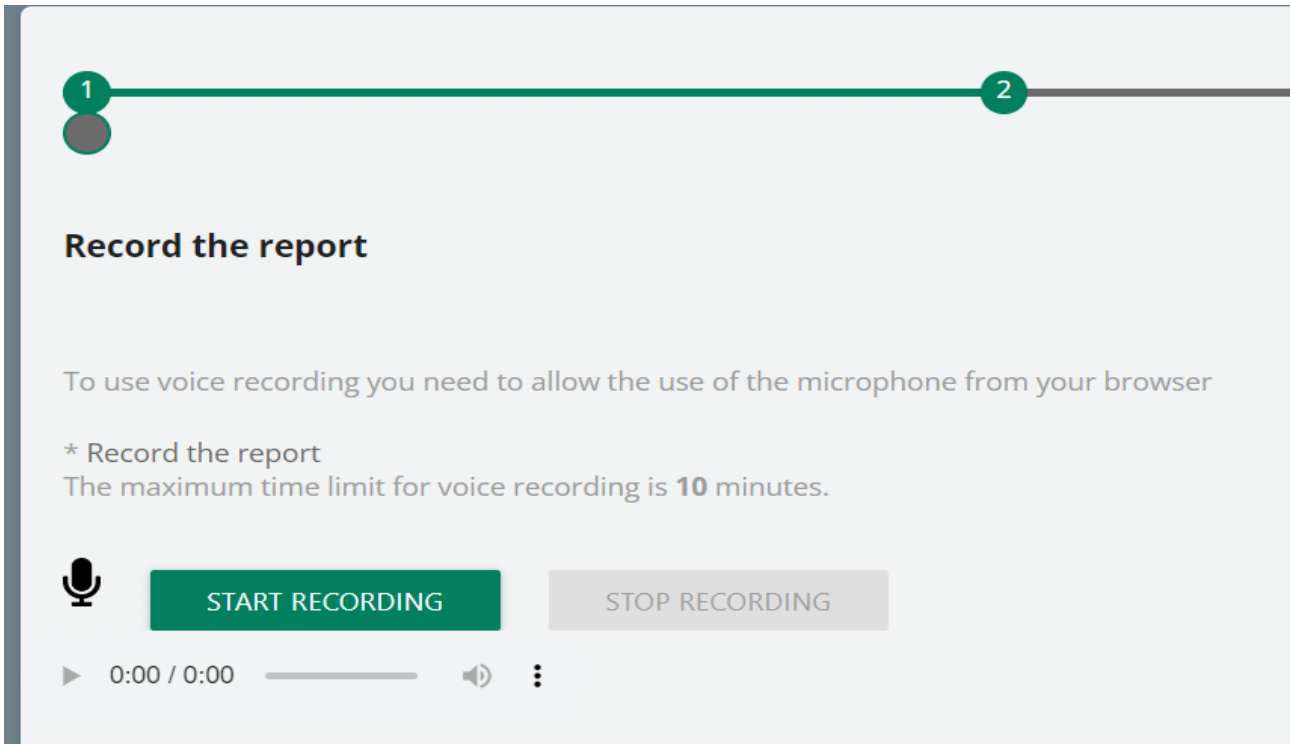
If you are registering from a mobile (mobile phone) you need to change the settings of the application/browser used directly from the "Settings" menu.

The recording will be made available for preview listening and, before sending, a **voice camouflage mechanism** will be activated, in order to make the vocal timbre unrecognizable.

Please **spell words clearly** and speak in an audible tone. **Incomprehensible reports may be discarded.**

BACK CONTINUE

After that, the report collection screen is displayed.



After allowing the use of the microphone from the browser, as suggested by the screenshot above, simply click on “START RECORDING” to start recording the voice message.

During the recording, the remaining time for the whistleblower to complete the report will be displayed.

When completed, it will be possible to listen to the recording again by clicking on the play button on the bar below the record button.

If provided by the company’s system, a voice camouflage filter will be applied to the recording when sending the report.

#### 4.4 Data preview

There is always a data preview section showing the data collected in the previously completed sections.

This section contains the send report button and a button to return to the previous sections.

**NOTE:** by clicking on the “SEND REPORT” button, the report will be forwarded to the Supervisors and it will no longer be possible to modify the data entered or cancel the sending of the report.



1

2

**Data Preview**

Place where this violation occurred

test

Indicate the company procedures violated

To which corporate function does the warning refer?

test

Facts description

test

Who are the main parties or individuals involved?

test

Attach any documents relevant to the report

test.docx

Date and/or time frame in which the events in question occurred

test

Indicate how the auditing body could get these documents

The conduct is unlawful because it violates:

Ethical code

Enter additional comments/notes here

Have you already notified the facts to other authorities and/or persons inside and/or outside the company?

NO

Indicates to which authority / function / subject

Do you wish to remain anonymous?

YES

Enter your contacts here if necessary

By proceeding, I declare that I have read the Privacy Notice, available on the Company's website

I accept

BACK

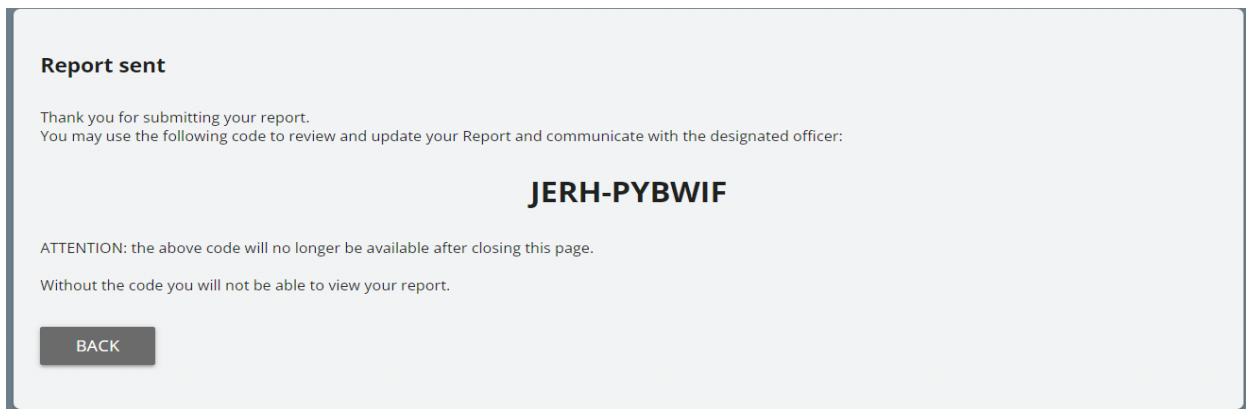
SEND REPORT >

## 4.5 Confirmation of submission

Once the report has been submitted, a confirmation page appears that will provide an identification code to consult your report in the future.

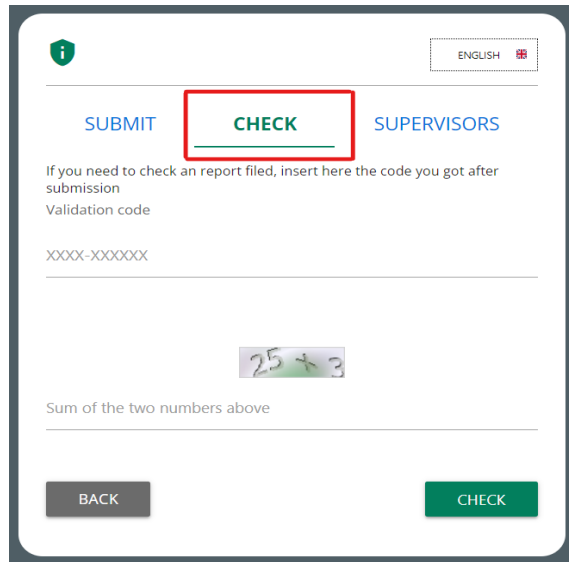
**NOTE:** It will be the reporter's responsibility to save and retain the system-generated code in order to be able to re-enter later the application at a later stage and check the status of the report (e.g., whether it has been taken into account, whether an investigation has been initiated, whether there are any messages in the system from the Supervisors in the system, whether it has been archived, etc.).

Below is an example of the screenshot:



## 5 Report consultation

Return to the login page and click on “CHECK” (marked in red).



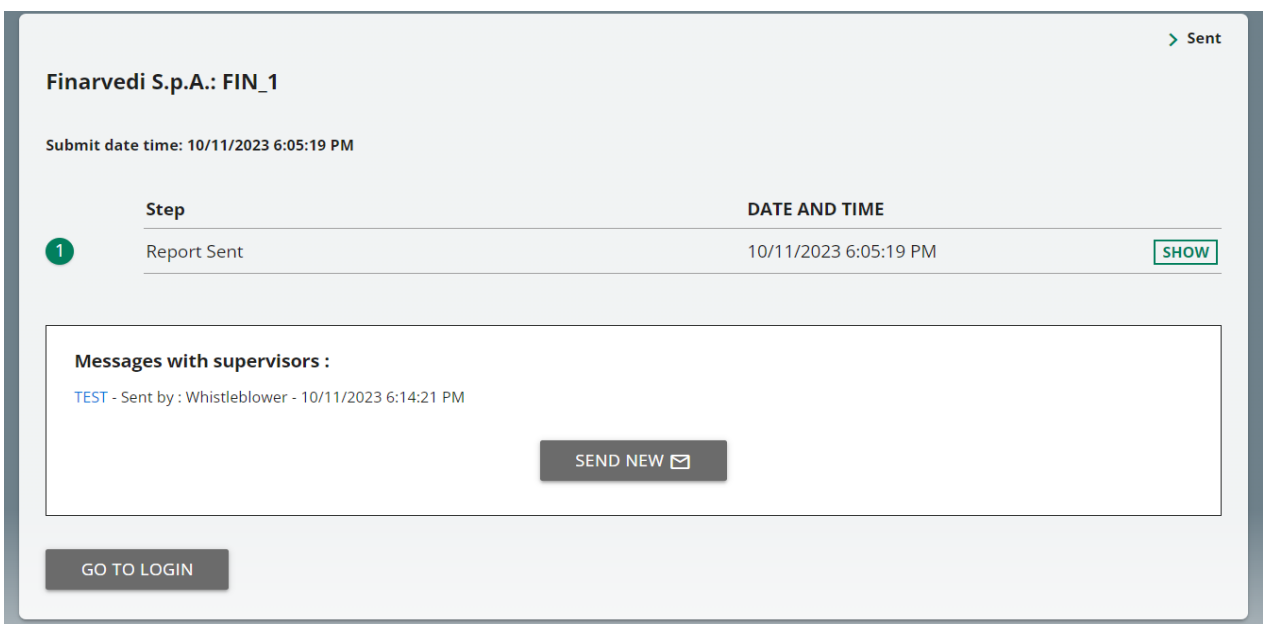
The screenshot shows a web interface for report consultation. At the top, there is an information icon and a language selector set to 'ENGLISH'. Below this are three buttons: 'SUBMIT', 'CHECK' (highlighted with a red box), and 'SUPERVISORS'. The main content area contains the following text: 'If you need to check an report filed, insert here the code you got after submission', 'Validation code', and a placeholder 'XXXX-XXXXXX'. Below this is a security check consisting of a box with the numbers '25 + 3' and the text 'Sum of the two numbers above' followed by a blank line for the answer. At the bottom, there are two buttons: 'BACK' and 'CHECK'.

Enter the code that was given you on the confirmation page when the report was sent.

Also complete the required security check.

### 5.1 Example of consultation page

The consultation page may have a different number of steps and may require messages to be sent or some steps to be completed by the Supervisors.



The screenshot displays a consultation page for 'Finarvedi S.p.A.: FIN\_1'. At the top right, there is a '> Sent' link. Below the header, the 'Submit date time' is '10/11/2023 6:05:19 PM'. A table lists the steps of the process:

Step	DATE AND TIME
1 Report Sent	10/11/2023 6:05:19 PM

Below the table, there is a section titled 'Messages with supervisors :'. It contains a message: 'TEST - Sent by : Whistleblower - 10/11/2023 6:14:21 PM'. At the bottom of this section is a 'SEND NEW' button with an envelope icon. At the very bottom of the page is a 'GO TO LOGIN' button. A 'SHOW' button is located to the right of the table row.

## 5.2 Common features of the report consultation page

### 5.2.1 Main information



The title in bold is formed by the **report type** and the **Reporting Code**.

### 5.2.2 Passage history

You can consult the questionnaire and the processing answers given in the previous steps by clicking on "SHOW".

Below is an example of the passage history of a completed report, it may be different from your configuration.

	Step	DATE AND TIME	
1	Report Sent	10/11/2023 6:05:19 PM	<a href="#">SHOW</a>

Here instead is the example of the data display screen, after clicking on "SHOW"

**Report Sent**

**Place where this violation occurred**  
test

**To which corporate function does the warning refer?**  
test

**Who are the main parties or individuals involved?**  
test

**Date and/or time frame in which the events in question occurred**  
test

**The conduct is unlawful because it violates:**  
Ethical code

**Indicate the company procedures violated**  
-

**Facts description**  
test

**Attach any documents relevant to the report**  
[test.docx](#) - uploaded on 10/12/2023

**Indicate how the auditing body could get these documents**  
-

**Enter additional comments/notes here**  
-

**Have you already notified the facts to other authorities and/or persons inside and/or outside the company?**

### 5.2.3 User Messaging

This feature is available to both the whistleblower and all the Supervisors with permissions to view/edit the report.

Sending messages will only be disabled when the report shifts to the “Closed” step.

**Messages with supervisors :**

TEST - Sent by : Whistleblower - 10/11/2023 6:14:21 PM

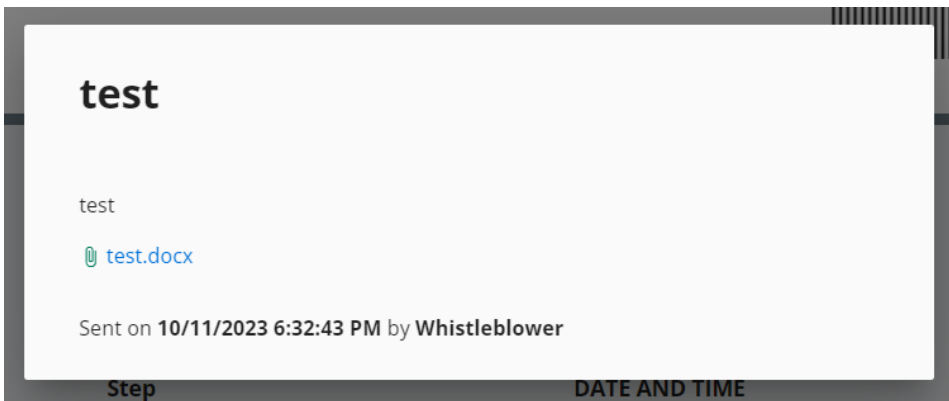
**SEND NEW**

Message history with send new message button.

The screenshot shows a web form titled "Send new". It contains the following elements:

- A "Subject\*" label above a text input field.
- A "Message\*" label above a larger text area.
- A question: "Do you have documents to upload?"
- Two radio buttons: "NO" (unselected) and "YES" (selected).
- Instructions: "Drag files on this control or select them after clicking on button. To do a multiple selection, keep down 'CTRL' key and click on the desired files."
- A green button labeled "FILE" with a file selection icon.

Message sending screen. It is possible to include attachments in the message.



Message saved with attachment