

Dear User,

with this *handbook*, we shall provide you with an explanation on how to report an offence anonymously and confidentially.

In order to get a better idea of what you can complain about, we ask you take a look at the Training Video, Code of Conduct Your Company's Model 231, Legislative Decree no. 231/2001, Law no. 179/2017; for operating procedures and the video available on https://www.mygovernance.it/tutorial-effettuare-segnalazione-whistleblowing/ by typing in the following password: **Tutorial2018**.

COMPLAINT SPECIFICATIONS

The complaint should refer exclusively to non-fulfilment of the principles in the Code of Conduct, the Model 231, internal procedures at the SCM Group, and the laws and regulations in your own country; so, complaints we receive that are laments, personal requests or, in more general terms, circumstances of no relevance to the above, shall not be taken into consideration.

The complaints need to be made in good faith, with details and based on factual elements that are exact and concurring. The purpose of this is also to avoid diminishing the effectiveness of a tool placed at your disposal. Anyone who makes fraudulent or seriously negligent accusations that are later proved to be unfounded could face disciplinary action under Model 231 and subsequent criminal charges.

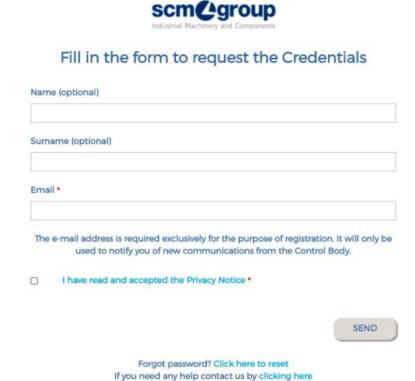
COMPLAINT MANAGEMENT

In order to fully protect your confidentiality and that of the person targeted by the "complaint" made by you, the necessary safety measures have been put in place: irrespective of the choice of filing a complaint anonymously or not (as indicated in point 4 below), the confidentiality of your identity in the complaint is guaranteed thanks to safety protocols and cryptographic tools that help protect personal data and the information provided. In the event of an anonymous complaint (confidential), your identity cannot be revealed other than in the cases foreseen under current legislation.



REQUEST FOR ACCESS CREDENTIALS

To request credentials, connect to the following link: https://areariservata.mygovernance.it/#!/WB/scmgroup



Registration can be done completely anonymously but the person making the complaint is required to provide an e-mail address where communications-updates can be sent by the Supervisory Body. This mail will need to be confirmed or changed when the complaint is sent (final stage of making the complaint).

This service is managed by MYGO S.r.I., Via del Corso, 92 Roma | P.iva 14356531005

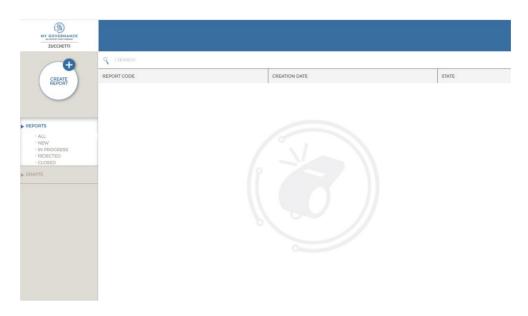


ACCESS PROCEDURE

1. once registered and the e-mail containing the Univocal Credentials have been received, access the link https://areariservata.mygovernance.it/ with your own credentials:







- 3. It will then be possible to make a complaint:
 - a. anonymously using the specific option:



b. or, not anonymously, but in any case, with legally guaranteed confidentiality





4. Once the form of complaint has been established, the person filing the complaint will fill in the form. Fields with an * are compulsory. Some fields are open and will require a minimum number of characters.



5. This will be followed by other requests for information needed to describe the complaint in detail, including the description of the facts in the designated box.

MY GOVERNANCE of Social Translation Control Tr			(SCM GROUP S.P.A.) SERENA OMODEI - (USER) • IT I EN
3/6 > DATA AND INFORMATION RE	ORT ILLEGAL CONDUCT		
	COMPANY/ORGANIZATION IN WHICH THE EVENT OCCURRED*		
	DATE OF THE EVENT*	PERIOD SINGLE EVENT	
	PLACE OF THE EVENT •		1
< 2 PREV	SUBJECT WHO COMMITTED THE EVENT •		NEXT 4 >
	NAME SURNAME	ROLE	
	WHICH DEPARTMENT THE VIOLATION REFERS TO?		
	□ ADMINISTRATION □ AUDITING FIRM	□ COMMERCIAL	
	□ PURCHASES □ MANAGEMENT CONTROL	☐ GENERAL DIRECTORATE	
	□ INNOVATION □ HSE	☐ IT ☐ HUMAN RESOURCES	
	□ MARKETING □ PRODUCTION □ GOVERNANCE □ OTHER	LI NUMAN RESOURCES	

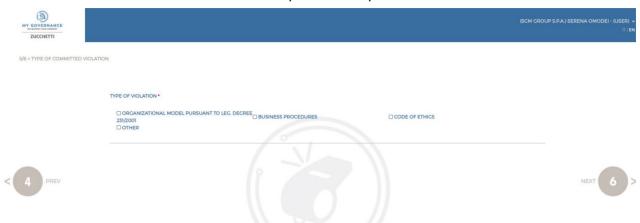


6. You will need to insert a description of the facts using at least 50 characters. The description can be made in your own language, although SCM Group would prefer it in Italian or English.

DESCRIPTION OF THE EVENT •			
THE DESCRIPTION MUST BE AT LEAST 50 CHARACTERS AND MAXIMUM 4000			



7. You will then need to indicate, if known, the kind of violation



8. The person making the complaint will then be able to attach documents that support the complaint:



9. Once the person making the complaint has reviewed the summary screen, s/he can sent it



SUMMARY

BEFORE SENDING THE SIGNAL WE PRAY YOU TO RECONTROLL AND CONFIRM INFORMATION INSERTS

	1. DETAIL	2. UPLOADED DOCUMENTS	3. CONSENT				
	☐ I DECLARE THAT ALL THE INFORMATION I HAVE PROVIDED IS TRUE, TO THE BEST OF MY KNOWLEDGE, AWARE OF THE RESPONSIBILITIES AND THE CIVIL AND PENAL CONSEQUENCES FORESEEN IN CASE OF FALSE DECLARATIONS AND / OR FALSE.						
	☐ I DECLARE TO CONSENT TO THE PROCESSING OF MY DATA	BY THE COMPANY PRIVACY NOTICE					
(CONFIRM YOUR E-MAIL AI	DDRESS OR CHANGE IT					
	serena.omodei@my	governance.it					
YOU CAN REPLACE THE E-MAIL ADDRESS ON WHICH YOU RECEIVE ALL THE COMMUNICATIONS RELATED TO THIS SIGNALING, ONE TIME REPLACED, CLICK ON THE LINK RECEIVED ON THE NEW E-MAIL.							
WE REMIND YOU THAT IN ANY CASE THE EMAIL ADDRESS WILL NEVER BE VISIBLE TO THE REPORTING MANAGER							
	PLEASE DO NOT USE YOU	R COMPANY EMAIL					
		CONFI	RM E-MAIL				

This final stage serves as confirmation if the person making the complaint wishes to receive communications-updates from the Supervisory Body via the e-mail used at the time of registering or if s/he would rather receive them at another e-mail address.

For any further doubts or clarifications, do not hesitate to contact our company referee or write to assistenza@mygovernance.it.

Yours sincerely,
The MY WHISTLEBLOWING Team