

Process description for the compliance with the legal requirements of the Italian *Whistleblower Law*

Revision 1, 15/11/2023

Target	Enabling the processing of information on violations of the law in accordance with the requirements of the Whistleblower Law, ensuring the protection of the whistleblowers.
Scope of application	<p>Information from employees and business partners (customers, suppliers, etc.) of COMEZ International s.r.l.</p> <p>The Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, by way of example, <i>lays down common minimum standards for the protection of persons reporting the following breaches of Union law:</i></p> <p style="padding-left: 40px;"><i>(a) breaches falling within the scope of the Union acts set out in the Annex that concern the following areas:</i></p> <ul style="list-style-type: none"> <i>(i) public procurement;</i> <i>(ii) financial services, products and markets, and prevention of money laundering and terrorist financing;</i> <i>(iii) product safety and compliance;</i> <i>(iv) transport safety;</i> <i>(v) protection of the environment;</i> <i>(vi) radiation protection and nuclear safety;</i> <i>(vii) food and feed safety, animal health and welfare;</i> <i>(viii) public health;</i> <i>(ix) consumer protection;</i> <i>(x) protection of privacy and personal data, and security of network and information systems.</i> <p>For more information on the scope please refer to the full text of this Directive.</p>
Description of the reporting process	<p>The employees and business partners of COMEZ International s.r.l. are given the opportunity to submit information on violations of the law via a protected reporting channel. Our company is interested in the clarification of information and has engaged TT Datenschutz GmbH to operate the reporting channel and organise the process. All reports are treated confidentially.</p> <p>In accordance with the Whistleblower Law, the reported violations must be related to the employee's professional activity. The reported violations must be violations of EU or Italian law. In the case of an anonymous report, the whistleblower may not be informed of the measures taken. In the event of an intentional or seriously negligent false report, the whistleblower is obliged to reimburse the damage incurred. Names, contact details and personal details will be treated as strictly confidential and will not be passed on by TT Datenschutz GmbH to those responsible at COMEZ International s.r.l. without the consent of the whistleblower.</p>

	<p>The report can be made verbally, in writing or, if desired, in person. The following possibilities have been set up for this purpose:</p> <p>TT Datenschutz GmbH, Karl-May-Str. 12, 01445 Radebeul, Germany</p> <p>Contact person: Thomas Töpfer</p> <p>Phone: +49 159 05505506 (in English language)</p> <p>E-Mail: whistleblower@tt-datenschutz.de</p> <p>Web-Portal: https://whistleblower.tt-datenschutz.de</p> <p>The identity of the whistleblower and the person concerned is only known to the contact person at TT Datenschutz GmbH and will not be disclosed without consent. The law forbids reprisals and disadvantages against whistleblowers.</p> <p>Depending on the reporting channel, the whistleblower will receive confirmation of receipt of their report after 7 calendar days at the latest. Within the following 3 months, the whistleblower receives information about the measures taken. The entire process is recorded by TT Datenschutz GmbH.</p>
<p>Applicable documents</p>	<p>General Data Protection Regulation (GDPR), Whistleblower Protection Act of Italy.</p>