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1 PURPOSE

The purpose of this procedure is to describe how to handle complaints, reports, statements, letters, or information submitted by Employees and/or Interested Parties alleging any deviation or non-compliance with applicable obligations, policies, standards, best practices, laws, and regulations.

2 SCOPE OF APPLICATION

The procedure applies to all the activities under the control of ANTIBA Spa.

3 REFERENCES

- ✓ Handbook, Policy, and Procedures
- ✓ Internal regulation

4 INTRODUCTION

The procedure aims at regulating the use of the reporting tool to ensure appropriate communication channels with its stakeholders (interested parties: employees, suppliers, partners, customers, etc.), to detect any alleged detrimental behavior, non-compliance, or violation against applicable laws and regulations, standards, best business practices or principles outlined in ANTIBA S.p.A. Policy.

Without prejudice to any legal obligations, particularly regarding the obligation to complain to the Judiciary Authority, process personal data, and guarantee privacy as established by the law.

5 REPORTING SYSTEM

Each interested party representing one of the ANTIBA S.p.A. internal or external stakeholders can submit a report *_related to the SA8000 principles_* through the “Reports and Complaints” form available on the Company notice boards, through APP or directly through the company website.

Instead, communications related to business activities (e.g., complaints, billing, etc.) must be sent through the usual service means.

The report can also be submitted wholly anonymously; it must be in good faith, substantiated, and thoroughly detailed to allow in-depth investigations to assess its grounds. Reports will be rejected when defamatory purposes or other personal interests are evidently intended.

5.1 Report Transmission

Employee communications are to be dropped off in the appropriate box (placed at the locker room entrance - indoor court side) or sent by ordinary or electronic mail.

In the case of anonymity, the reply will be public through the information tools available to the Company: internal communication (via APP, periodic meetings, or through the SA8000 workers’ representative) or web space.

If the reporting party is mentioned, they will directly receive the reply.

The report can be sent **to the attention of the Social Performance Team:**

- ✓ Via mail, to *Conceria Antiba SPA*, via M. Luther King 39, 41, 43 - 56024 Ponte A Egola - San Miniato/PI;
- ✓ Via email to: segnalazioni@antiba.it;

or to the attention of the RS System Certifying Body or International Accredited Body:

- Body for System Certification:

Bureau Veritas Italia Spa – Divisione Certificazione Att. Responsabile CSR Viale
Monza 347, 20126 Milano
email: csr@it.bureauveritas.com;

- **International SAAS accredited body:**

Social Accountability Accreditation Service
9 East 37th Street, 10th Floor, New York, NY 10016
email: saas@saasaccreditation.org;
Phone (212) 391-2106 – fax (212) 684-1515

5.2 Report Transmission

Reports are received by a member of the SPT (Alessandra Viti, Daniele Daini Palesi), the “Receiving Party,” who commits to providing a first feedback to the Reporting Party within 30 days.

According to the requirements, the “Receiving Party” is entitled to involve other relevant corporate divisions to handle the report after making it anonymous, if necessary.

The actions assessing the grounds of the events alleged in the report will be carried out by the “Receiving Party” in compliance with the principles of fairness and confidentiality, performing any activity deemed appropriate and involving the relevant corporate business divisions.

At the end of the assessment phase, if the report is substantiated, the “Receiving Party” must notify the Management, suggesting an appropriate action plan.

If the report is proven to be grounded, ANTIBA S.p.A. must take any measures and actions deemed appropriate to protect the company.

Once the preliminary investigation is completed, the Receiving Party will inform the reporting party, if not nameless, through the chosen channels.

The “Receiving Party” regularly submits a recap of the whistleblowing reports received and analyzed during the reporting period to the relevant supervisory bodies.

For statistical purposes, the “Receiving Party” will update the whistleblowing register containing both the reports and the relevant status. Any personal data present is processed in compliance with Data Protection Regulations in force and kept for the period strictly necessary to handle the report.

6 PROTECTION AND RESPONSIBILITY OF THE REPORTING PARTY

ANTIBA S.p.A. ensures the anonymity of the Reporting Parties that provide their personal details and reserves the right to take any appropriate actions against anyone who carries out or threatens to carry out retaliatory acts against those who have filed reports under this procedure.

Any threats or retaliation against the Reporting Party or those involved in the assessment activities is not tolerated.

It is under the responsibility of the Reporting Party to file the reports in good faith and under the declared spirit of the project. Any whistleblowing detected as undoubtedly false or completely groundless, opportunistic, and/or made with the sole purpose of harming the Reported Party or individuals anyhow involved in the report will not be abode.

7 RIGHTS OF THE REPORTED PARTY

During the investigation and assessment of any possible non-compliance, the report subjects could be involved in or notified of such activity. Still, in no event will a proceeding be initiated on the sole whistleblowing grounds if no factual evidence is detected as to the content of the report. This could happen only in the case of other evidence found and ascertained due to the report.

8 PERIODIC UPDATES AND REPORTING

This procedure is subject to regular annual examinations during the Management Review.

This procedure is applicable from the date of release.

The Management will regularly assess the procedure's proper application and relevant need for modification/revision.