		<b>INSTRUCTION</b> Report Management System "MY GOVERNANCE" Platform		
<i>Code</i>	<i>Drawn up by</i>	<i>Checked by</i>	<i>Approved by</i>	Rev. 00 – 24.01.2022
P700_I01	SGI	SGI	Directorate	Page 1 of 6

## 1. PURPOSE

The purpose of this instruction is to describe the path to be followed to report wrongdoing, using the "My Whistleblowing" software, managed through "My Governance" platform available on the company website [www.bertanitrasporti.it](http://www.bertanitrasporti.it).

## 2. REFERENCE DOCUMENTATION

Model of Organization, Management and Control 231/01;  
Code of Ethics;  
Legislative Decree 196/2003;  
GDPR 2016/679 (European Privacy Regulation);  
Legislative Decree 101/2018;  
P700 Whistleblowing System

## 3. APPLICABILITY


This instruction applies to all users better identified as employees and to all collaborators of the company, regardless of the contractual relationship with the same (temporary workers, subordinate workers, seconded workers, project collaborators, agents, interns, consultants, customers, suppliers, etc.) who find themselves working with Bertani Trasporti S.p.A.

## 4. OPERATING MODES

Reports must be made in good faith, detailed and based on precise and concordant facts, also in order not to waste the effectiveness of the tool made available. Anyone, who maliciously makes reports that subsequently prove to be unfounded, may be subject to the disciplinary sanctions provided for in the 231 Model.


### 4.1 Management of the reports

In order to maximise the protection of the confidentiality of the 'whistleblower' and of the 'reported' person, the necessary security measures have been taken: regardless of whether a report is anonymous or not, the confidentiality of the whistleblower's identity is guaranteed through secure protocols and encryption tools, to protect the personal data and information provided. The identity of the whistleblower will not be disclosed except in the cases provided for by the legislation in force.

		<b>INSTRUCTION</b> Report Management System "MY GOVERNANCE" Platform		
<i>Code</i>	<i>Drawn up by</i>	<i>Checked by</i>	<i>Approved by</i>	Rev. 00 – 24.01.2022
P700_I01	SGI	SGI	Directorate	Page 2 of 6

#### 4.2 "MY GOVERNANCE" Platform – Activation and Management of reports through personal/corporate e-mail


1. Connect to the link <https://areariservata.mygovernance.it/#!/WB/bertani-trasporti> and proceed to create an ID by entering your name, surname and e-mail address (possibly NOT the CORPORATE one). Once you have registered, you will receive an e-mail containing an identity confirmation link which will authorise you to enter the platform and you will be automatically redirected to the login screen. The same e-mail will contain your credentials, the password which you will have to change the first time you log in by following the complexity criteria described therein.



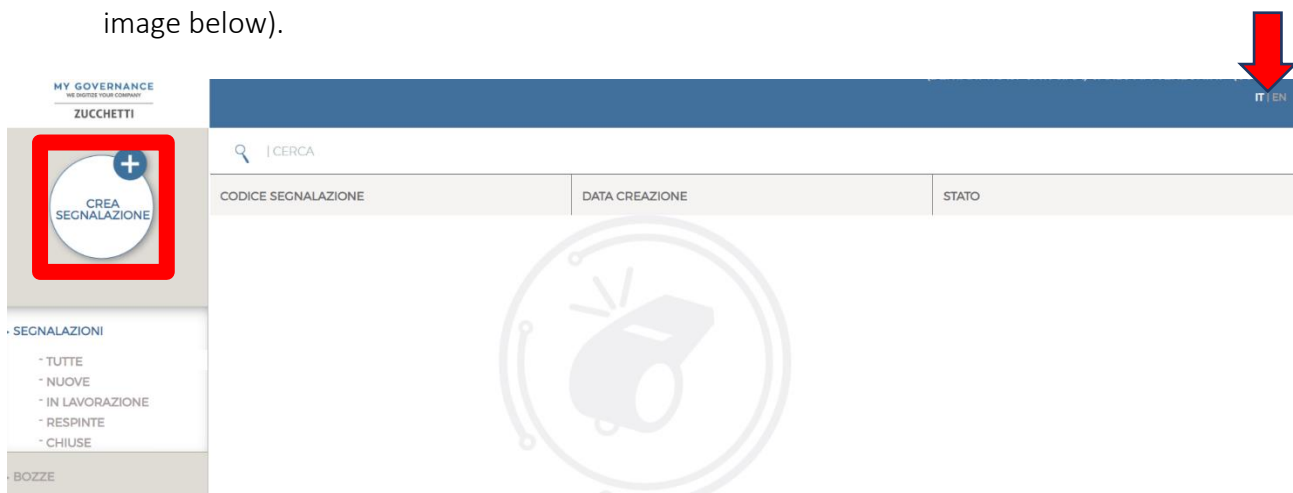
**MY GOVERNANCE**


**PASSWORD DIMENTICATA? FORGOT PASSWORD?**  
[CLICCA PER RESETTARE / CLICK HERE TO RESET](#)

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I'm not a robot
 
  
reCAPTCHA  
Privacy - Terms

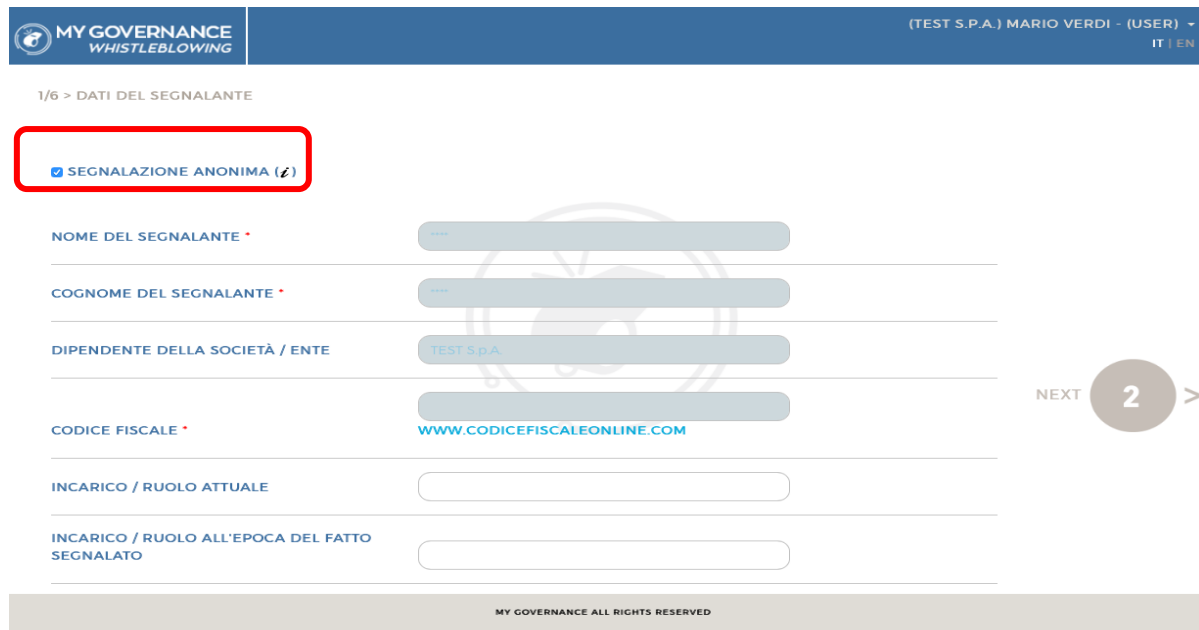
2. Once you are in the platform you can choose the language IT/EN (as indicated by the arrow) and then select "CREA SEGNALAZIONE" (CREATE A REPORT) to proceed (as shown in the image below).



		<b>INSTRUCTION</b> Report Management System "MY GOVERNANCE" Platform		
<i>Code</i>	<i>Drawn up by</i>	<i>Checked by</i>	<i>Approved by</i>	Rev. 00 – 24.01.2022
P700_I01	SGI	SGI	Directorate	Page 3 of 6

3. It will now be possible to proceed with reporting:

a) anonymously, by using the appropriate option (as shown in the image highlighted in red):



1/6 > DATI DEL SEGNALANTE

SEGNALAZIONE ANONIMA (z)

NOME DEL SEGNALANTE \*

COGNOME DEL SEGNALANTE \*

DIPENDENTE DELLA SOCIETÀ / ENTE

CODICE FISCALE \*

INCARICO / RUOLO ATTUALE


INCARICO / RUOLO ALL'EPOCA DEL FATTO SEGNALATO

NEXT 2 >

MY GOVERNANCE ALL RIGHTS RESERVED

b) or signed, by filling in the appropriate spaces (as shown in the image above) but in any case, with the guarantees of confidentiality provided for by law. Fields marked with an "\*" are mandatory. Some fields are open and must have a minimum number of characters.

4. As a first question, you will be asked whether the report has already been made to others or not (e.g., your direct manager in the case of an employee, a senior person in a company, or a third party such as a public authority, etc.). If not, the reason will be requested.

		<b>INSTRUCTION</b> Report Management System "MY GOVERNANCE" Platform		
<i>Code</i>	<i>Drawn up by</i>	<i>Checked by</i>	<i>Approved by</i>	Rev. 00 – 24.01.2022
P700_I01	SGI	SGI	Directorate	Page 4 of 6

LA SEGNALAZIONE È GIÀ STATA EFFETTUATA AD ALTRI SOGGETTI?  SI  NO

PER QUALI MOTIVI LA SEGNALAZIONE NON È STATA RIVOLTA AD ALTRI SOGGETTI?

5. This will be followed by further requests for information necessary to substantiate the report (Company/Body where the event occurred, date and place, person who committed the offence and the area to which the violation refers).

2

PREV

SOCIETÀ / ENTE IN CUI SI È VERIFICATO IL FATTO •

DATA IN CUI SI È VERIFICATO IL FATTO •  PERIODO  SINGOLO EVENTO

LUOGO FISICO IN CUI SI È VERIFICATO IL FATTO •

SOGGETTO CHE HA COMMESSO IL FATTO •

NOME	COGNOME	RUOLO
<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>


A QUALE DIPARTIMENTO SI RIFERISCE LA VIOLAZIONE? •

<input type="checkbox"/> AMMINISTRAZIONE/FINANZIARIO	<input type="checkbox"/> AREA UFFICIO DANNI	<input type="checkbox"/> COMMERCIALE
<input type="checkbox"/> OPERATIVO TRASPORTI	<input type="checkbox"/> DIREZIONE GENERALE	<input type="checkbox"/> ACQUISTI/SGI
<input type="checkbox"/> IT	<input type="checkbox"/> PRODUZIONE/MAGAZZINI	<input type="checkbox"/> RISORSE UMANE
<input type="checkbox"/> ALTRO		

4

NEXT

6. A description of the facts shall be entered in at least 50 characters.

		<b>INSTRUCTION</b> Report Management System "MY GOVERNANCE" Platform		
<i>Code</i>	<i>Drawn up by</i>	<i>Checked by</i>	<i>Approved by</i>	Rev. 00 – 24.01.2022
P700_I01	SGI	SGI	Directorate	Page 5 of 6

DESCRIZIONE DEI FATTI \*

LA DESCRIZIONE DEVE ESSERE DI ALMENO 50 CARATTERI E MASSIMO 4000

7. Therefore, the type of violation should be reported, if known.



5/6 > TIPOLOGIA DI VIOLAZIONE COMMESSA

TIPOLOGIA DI VIOLAZIONE \*

VIOLAZIONI MODELLO 231

LEGGI E/O REGOLAMENTI

VIOLAZIONI AMBITO HR


ALTRO

PROCEDURE E ISTRUZIONI AZIENDALI

REGOLAMENTI AZIENDALI

VIOLAZIONI PRIVACY

8. The whistleblower may then attach documents in support of his/her report:

		<b>INSTRUCTION</b> Report Management System "MY GOVERNANCE" Platform		
<i>Code</i>	<i>Drawn up by</i>	<i>Checked by</i>	<i>Approved by</i>	Rev. 00 – 24.01.2022
P700_I01	SGI	SGI	Directorate	Page 6 of 6

6/6 > DOCUMENTAZIONE

ALLEGA DOCUMENTI UTILI ALLA TUA SEGNALAZIONE  
TIPO DI FILE AMMESSI : PDF / JPG / PNG / DOC / DOCX / XLS / XLSX / PPT / ZIP / MP3 / MP4

TRASCINA FILE O CLICCA PER CARICARE  
MAX 50MB

5



IN VIA

9. Once the report summary screen has been reviewed, the whistleblower can proceed to send the report, by giving his/her consent to the attached Privacy Policy.

### RIEPILOGO

PRIMA DI INVIARE LA SEGNALAZIONE TI PREGHIAMO DI RICONTROLLARE E DI CONFERMARE LE INFORMAZIONI INSERITE

1. DETTAGLIO

2. DOCUMENTI CARICATI

3. CONSENSO

DICHIARO CHE TUTTE LE INFORMAZIONI DA ME RIPORTATE SONO VERITIERE, PER QUANTO DI MIA CONOSCENZA, CONSAPEVOLE DELLE RESPONSABILITÀ E DELLE CONSEGUENZE CIVILI E PENALI PREVISTE IN CASO DI DICHIARAZIONI FALSE E/O MENDACI.

DICHIARO DI PRESTARE IL CONSENSO AL TRATTAMENTO DEI MIEI DATI COME PREVISTO [DALL'INFORMATIVA PRIVACY](#).

10. At any time, it is possible to check the status of the report by accessing the platform with your own credentials. For further information, please contact the SGI Team [sgi@bertanitrasporti.it](mailto:sgi@bertanitrasporti.it).