

**Internal information
on the whistleblowing system**

IPG

IPG
ItalPressGauss

1. Introduction

ItalPresseGauss S.r.l. firmly believes in integrity, transparency, and accountability. The company is committed to fostering a work environment where everyone feels safe to speak up if they observe or suspect unlawful or unethical conduct.

To support this principle, a dedicated whistleblowing system has been implemented, in compliance with Legislative Decree 24/2023 and EU Directive 2019/1937, allowing employees, suppliers, business partners, and other stakeholders to report concerns in a secure, confidential, and, if preferred, anonymous manner.

2. Purpose of the System

The whistleblowing system has the following objectives:

- Enable early detection of unlawful, irregular, or unethical conduct.
- Promote a culture of legality, ethics, and social responsibility.
- Ensure compliance with laws, internal regulations, and applicable standards.
- Protect individuals who report in good faith from retaliation, discrimination, or prejudice, even if the report turns out to be unfounded.

3. What Can Be Reported

Reporting is encouraged for any conduct believed to be contrary to the company's values or applicable laws, including:

- Fraud, theft, or corruption
- Bribery or conflicts of interest
- Harassment, discrimination, or other unethical behavior
- Health, safety, or environmental violations
- Violations of data protection and privacy regulations
- Any attempt to conceal or cover up unlawful behavior

Even if you are unsure whether a conduct falls into the categories above, you are encouraged to report it. All reports are carefully evaluated with the utmost attention and confidentiality.

4. What Is NOT Covered by the System

The system should not be used for:

- Personal issues or internal HR disputes
- Complaints about customers, products, or services
- General requests or feedback

For these matters, it is necessary to contact the HR office or the relevant department.

5. Reporting Procedure

ItalPresseGauss S.r.l. provides a secure and independent reporting platform that is:

- Available 24/7
- Accessible in multiple languages
- Designed for anonymous or identified reports

Reports can be submitted via the dedicated portal: <https://www.italpressegauss.com/whistleblowing/>

The platform guides the reporter step by step. A confirmation of receipt will be sent within 7 days, and updates on the status of the report will be provided within 3 months (up to 6 months for complex cases). It is possible to follow the case anonymously using a unique access code.

6. Data Controller

The data controller for personal data collected through the whistleblowing system is ItalPresseGauss S.r.l., located at Via Trento, 178, Capriano del Colle (BS), contactable at legal@italpressegauss.com.

7. Processing of Personal Data

All reports are processed in accordance with the GDPR. In particular:

- Reporter data is used solely for managing the report
- Access to data is limited to authorized personnel
- No data will be shared with third parties without consent, except where required by law
- The rights of access, rectification, and erasure of personal data are guaranteed
- Data will be retained only for the time strictly necessary to manage the case, unless longer retention is required by law

8. Management of Reports

Received reports are:

- Recorded and classified securely and confidentially
- Analyzed by a dedicated internal management team
- Investigated fairly, transparently, and confidentially
- Concluded with corrective, disciplinary, or improvement actions if misconduct is confirmed

9. Guarantees for the Reporter

ItalPresseGauss S.r.l. guarantees:

- Maximum confidentiality for all reports and identities
- Protection against retaliation for those reporting in good faith, even if the report is unfounded
- Fair and thorough investigations in every case
- Appropriate actions if the report confirms misconduct
- Any violations of these guarantees will be sanctioned according to company policies

The reporter has the right to contact the competent authority directly if they believe the report has not been properly addressed.

10. Obligations and Responsibilities of Recipients


All employees and collaborators are required to:

- Report unlawful or irregular conduct they become aware of
- Avoid submitting unfounded or malicious reports

Whistleblowing is essential to protect people, the environment, and the reputation of ItalPresseGauss S.r.l. Speaking up helps contribute to a safe, respectful, and compliant work environment, strengthening mutual trust and the company's ethical culture.

11. Updates and Communication

ItalPresseGauss S.r.l. reserves the right to periodically update this information to ensure continuous compliance with applicable laws and improvement of reporting procedures. The information is communicated to all employees and collaborators and made available within the company.



Marco Gandini

Managing Director
ItalPresseGauss S.r.l.