



Preamble: At MANE, we believe that being a responsible company starts with behaving in an ethical manner. The MANE Group Code of Ethics lays out the high ethical standards and principles of conduct that we strive to apply in our everyday business activities. To take things a step further, MANE strongly encourages and promotes the reporting of wrongdoing in the workplace, or whistleblowing, as a way to help prevent illegal behaviour.

Purpose: The purpose of this policy is to provide stakeholders with information on how they can report actual or presumed situations of non-compliance with laws or wrongdoing by or on behalf of the MANE Group. It sets out the procedure for reporting, processing, and remediating such wrongdoing, while ensuring the protection of the whistleblower, or the person revealing the wrongdoing, and the ‘facilitator’, or the individual assisting the whistleblower in the whistleblowing process.

Scope: This document applies to all MANE internal and external stakeholders, whether they are natural or legal persons: employees, contractors, and interns of the MANE Group, regardless of contract type or role; customers; suppliers; business partners; trade unions legitimately representing natural persons; civil society organisations; and citizens.

Normative references: European Union (EU) Directive 2019/1937 and national decrees which transpose the directive in EU Member States; MANE Group Code of Ethics.

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I. Definition of whistleblower and purpose of this policy

A whistleblower is a natural person who reports or discloses, in good faith and in the absence of direct financial compensation, information relating to a crime or misdemeanour, a threat or menace to the public interest, a violation or an attempt to conceal a violation of an international agreement that has been legally ratified or approved by the EU Member States, or a unilateral act of an international organisation, carried out on the basis of such an agreement, EU law, laws or regulations.

This policy aims to:

- Inform relevant parties about the system put in place by the MANE Group for reporting situations of wrongdoing that they become aware of;
- Set out the procedures for said reporting;
- Ensure the protection of whistleblowers.

II. Scope of application and type of reports

1. Scope of application

This policy applies to all MANE employees, contractors and interns of the MANE Group and anybody working on behalf of the Group, regardless of contract type or role, who would like to report conduct of, in or on behalf of the company that they believe to be unlawful or a situation in which the human or environmental impact of such conduct is adversely affecting them.

For employees, reports may concern an incident that occurs during the probationary period, selection process, pre-contractual phases, employment phase or after the termination of the contractual relationship.

This policy also applies to all MANE external stakeholders, such as customers, suppliers, business partners, trade unions legitimately representing natural persons, civil society organisations and citizens who would like to report conduct of, in or on behalf of the company that they believe to be unlawful or a situation in which the human or environmental impact of such conduct is adversely affecting them.

2. Type of reports

The reports may concern a violation of national or EU civil, criminal, administrative, financial and/or accounting law. The violation may be harmful to the public interest, the EU's financial interests, the EU market, or the MANE Group's integrity. The reports may also concern an act or an omission which the whistleblower has reasonable grounds to consider a breach of national or EU law.

The reports may concern a known or presumed incident and/or behaviour that constitutes a violation of the MANE Group Code of Ethics.

Reports that do not fall under this procedure include:

- Personal matters related to the whistleblower's individual employment relationship or interactions with their managers;
- National security and defence matters;



- Violations that are already regulated in mandatory sectors, where specific whistleblowing procedures apply.

The three abovementioned report types may be handled through the standard internal communication channels in place locally, such as reporting structure, employee representative bodies and the human resources department.

III. Reporting procedure and content of reports

MANE has put in place several efficient and easily accessible systems for both its employees and external stakeholders to report behaviours, acts or omissions that may harm the company's integrity:

Our employees can first raise their concerns with their line manager. If this is not possible, or if they do not feel comfortable doing so, they can speak to their representative bodies or their local human resources department.

Failing this, our employees and all external stakeholders can report a known or presumed violation through our SpeakUp system.

The SpeakUp system is operated by an independent service provider and is available 24/7. Via the SpeakUp system, whistleblowers can report wrongdoing or concerns in their own language, via phone or internet. If the report is made through a voice message, the whistleblower may review, correct and confirm the report transcription.

All questions or issues raised will be treated confidentially and be anonymised before being shared with the MANE Ethics Committee, which manages reports received through the SpeakUp system.

Please refer to Chapter VII of this policy for relevant practical details.

Reports must include the following information to be accepted:

- Full name of the whistleblower (optional);
- Position or role (optional);
- Email address of the whistleblower (optional);
- Contact number of the whistleblower (optional);
- Work location;
- Date and/or period when the wrongdoing occurred;
- Physical location where the event took place (name of the office or address);
- Clear and detailed description of the conduct, act or omission in question;
- How the whistleblower became aware of the issue;
- Identity of the wrongdoer, if known, or other identifying details;
- Names of others aware of the event who can provide further information;
- Any documents providing supporting evidence;
- Any additional relevant information;
- Whether the whistleblower wishes to benefit from whistleblower protections.

The report must be submitted within thirty (30) days of the event giving rise to the concern.



Anonymous reports can only be accepted if they are precise, sufficiently detailed, include specific information (such as names, descriptions, office locations or case references) and are backed by appropriate documentation.

Any personal information disclosed in the report should have a direct link to the wrongdoing reported.

A report will be deemed inadmissible and archived if it lacks the essential information listed above, if the facts are evidently unsubstantiated, if the details are too vague to understand or if only documents are submitted without an actual report.

Reports submitted through channels or addressed to a person other than those indicated in Chapter III will not be considered by the company.

If requested, reports may also be submitted through a direct meeting arranged within a reasonable time frame. The meeting may be recorded with the whistleblower's consent. If recording is not possible or consent is withheld, written minutes of the meeting will be drawn up and signed by the whistleblower.

If the report concerns the person responsible for managing the reporting channel, the report will be handled by other members of the Ethics Committee or additional persons appointed with the approval of the other members of the Ethics Committee or by the CEO of the Group.

IV. Receipt, investigation and verification of reports

Upon receiving the report, the MANE Ethics Committee will assess its validity objectively, competently and diligently. An investigation will be launched involving other company departments or external experts with the required technical skills and additional relevant individuals will be interviewed if necessary.

Upon receipt:

- i. An acknowledgment will be sent to the whistleblower within seven (7) days of receipt;
- ii. Additional information about the reported facts may be requested;
- iii. A meeting may be organised, which may, with the whistleblower's consent, be recorded using suitable equipment. In the event that consent is withheld, or in any other case where recording is not possible, minutes of the meeting must be drawn up and signed by the whistleblower;
- iv. A response will be provided within three (3) months, stating whether the case has been archived, validated or referred to internal/external authorities, or an update will be given if the investigation is still ongoing.



V. Protection measures

The following protections apply to those, as defined in Chapter II.1, who report illegal conduct or wrongdoing in good faith and who reasonably believe that the information provided and any allegations they make are substantially true.

1. Confidentiality obligations

The whistleblower's identity and any other information from which this identity may be inferred, directly or indirectly, may not be disclosed, without their express consent, to persons other than those responsible for receiving or following up reports and expressly authorised to process such data.

Anyone involved in managing the report must maintain strict confidentiality. Violation of this duty is subject to disciplinary action.

2. Anonymity protection

MANE ensures anonymity to protect whistleblowers so that they do not withhold reports out of fear of retaliation.

Anonymity is guaranteed during disciplinary proceedings if the disciplinary charge is based on investigations that are separate and additional to the report. This is the case when the report is only one of the elements that brought the wrongdoing to light, but the charge is based on other facts that alone are sufficient to trigger the initiation of disciplinary proceedings.

3. Personal data protection

If personal data disclosure becomes necessary, the whistleblower will be informed. This personal information is only made available to the MANE Ethics Committee in charge of processing the report within the framework described hereabove.

The Ethics Committee ensures that only data strictly limited to the areas covered by the report mentioned in Chapter III of this policy may be processed.

The Ethics Committee will be especially vigilant with regard to the processing of sensitive data such as data on ethnic origin or so-called racial origin; political opinions; religious or philosophical beliefs; union membership; genetic data; biometric data; health data; data pertaining to one's sex life or sexual orientation; and data relating to offences, convictions and security measures with regard to natural persons.

To ensure that personal data continues to be protected, any transfer of this personal data to Group organisations outside the EU will be subject to the specific provisions of Articles 44 et seq. of the GDPR (EU Regulation 2016/679 of the European Parliament and the European Council of 27 April 2016).

4. Document retention

Reports and documentation sent by the whistleblower will be erased after the legal retention period.

Documentation related to the investigation will be retained only as long as necessary for processing the report, and no longer than five (5) years from the final outcome.



In the case of transcription of a report made over the phone or orally during a meeting with the staff member in charge, the whistleblower may verify, correct and confirm the minutes of the meeting by signing them.

5. Prohibition of retaliation

No form of retaliation or victimisation is allowed against whistleblowers, facilitators, colleagues of the whistleblower and/or the persons involved in processing the report, if the concern is raised in good faith under the provisions of the policy.

Retaliation includes:

- Dismissal, suspension or equivalent measures;
- Demotion or denial of promotion;
- Job or workplace changes, salary reduction or shift changes;
- Suspension from or restricted access to training;
- Negative performance reviews or references;
- Disciplinary action or sanctions;
- Coercion, harassment or ostracism;
- Discrimination or other unfavourable treatment;
- Non-renewal or premature termination of fixed-term contracts;
- Damage to reputation or financial harm.

These protection measures also apply to those assisting the whistleblower, colleagues of the whistleblower and entities owned by the whistleblower.

However, they will not apply if, at the end of the investigation by the MANE Ethics Committee, the whistleblower is found criminally liable for defamation or slander or civilly liable for intentional or gross negligence, leading to disciplinary sanctions.

Disciplinary measures can also be taken if anyone destroys or conceals evidence of the protected report made/to be made.



6. Whistleblower sanctions

If a whistleblower is found liable for defamation, slander or similar offences related to the report, or civilly liable for intentional misconduct or gross negligence, disciplinary measures may be initiated, with sanctions applied in accordance with current laws and collective agreements.

VI. Policy management

To ensure its continued relevance and effectiveness, management will carefully monitor both internal and external factors and make necessary adjustments to this policy, at any time and without prior notice.

VII. Publication

This whistleblowing policy is available on MANE's website (www.mane.com) and intranet and is posted on company notice boards. Reports can be made confidentially through our SpeakUp system, via the following three options:

Phone

Italy: +39 800 147 694
(free of charge)

Spain: +34 900 031 156
(local rates apply)

Download the app



Web service



<https://mane.speakup.report/en-GB/raiseaconcern/home>