



## WHISTLEBLOWING – INFORMATION ABOUT THE USE OF THE IT PLATFORM

Rev. 0  
October 2022

Airport Handling S.p.A. with registered office in Somma Lombardo (VA), Aeroporto Milano Malpensa 2 (hereinafter “**Airport Handling**” or the “**Company**”), in performing its duties considers the respect of all applicable regulations by its *stakeholders* as well as the ethical principles at the basis of its activity as individuated in the Code of Ethics approved by the Board of Directors as fundamental. In this frame, the Company put in place a management system for the reporting of illicit facts or contrary to the ethical principles aforementioned (the so called “Whistleblowing”) consisting in an IT platform whose technical support is entrusted to a primary operator in the sector for sending reports by all parties involved (employees and collaborators of the Company, consultants, suppliers and any other third party who has a relationship or carries out activities on behalf and/or in the interest of Airport Handling).

The IT platform grants the confidentiality of entered personal data as well as the content of the reports, in particular, the personal data and the identity of the whistleblower, without prejudice to any legal obligations.

Airport Handling, moreover, undertakes to comply with the regulation in force with reference to personal data protection.

The IT platform stands in a website external to Airport Handling, whose access is not tracked.

### How to access the platform

The IT platform dedicated to whistleblowing is accessible using Google Chrome browser clicking on the link Whistleblowing in the Legal Notice section of the website [www.airporthandling.eu](http://www.airporthandling.eu) through which the user has immediate access to the homepage of the platform to fill in or verify his own report.

For reference, all the passages in order to fill in and verify the report are explained in the Whistleblower Manual available in the Legal Notice section of the website [www.airporthandling.eu](http://www.airporthandling.eu).

Once accessing the platform, the whistleblower can proceed according to instructions proposed in the platform.

Once the user ends the filling in, the platform will release the whistleblower a specific code - no more retrievable after sending the report – that the user needs to keep; this code allows, only to the whistleblower, to verify at any time the state of the art of the report and to communicate further information or documents useful to investigate the reported events.

### What to report

Reports can be referred to:

- conduct in violation of the Code of Ethics (e.g.: alleged bribery, conflicts of interest, misuse of company assets or negligence in their use) as identified in Airport Handling Code of Ethics available at the following link: [www.airporthandling.eu/docs/ethical-code-en.pdf](http://www.airporthandling.eu/docs/ethical-code-en.pdf);
- alleged commission of crimes covered by Legislative Decree 231/2001 (e.g.: environmental crimes, violations of health and safety regulations in the workplace, crimes against the State or other public



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entity, etc.) or for failure to comply with company procedures as identified within Airport Handling Organizational Model – General Part, available at <https://www.airporthandling.eu/docs/organizational-model-en.pdf>;

- violations of procedures, fraud, non-compliance with contractual clauses.

For commercial or operational communications (e.g.: complaints, commercial information, etc.), other dedicated channels are available at the Company's website.

### To whom the report has to be addressed

Reports can be addressed at the following bodies for competence, in accordance with the content of the report:

- Human Resources – Finance: they act as the primary channel in charge to manage the report;
- Sales&Business Development – Operations: they act as the alternative channel in charge to manage the report and to whom attention the report has to be addressed in order to be managed when the whistleblower thinks that directions acting as the primary channel might not be impartial or have independence of judgement.

### Confidentiality on the identity of the whistleblower and the content of the reports

The report shall be managed by the responsible bodies so that the confidentiality of personal data and the content of the report is granted, in particular, the identity of the whistleblower who, if declared, will not be disclosed, except in cases provided for by regulatory provisions.

During the fact check procedure related to the report, every right of the whistleblower is granted and, in no case, proceedings will be initiated against the whistleblower in the absence of concrete evidence on the truthfulness and validity of the report. The whistleblower will be protected at all times, both during the reporting process and afterwards, from the possibility that sanctions, discriminatory measures, retaliation of any kind, directly or indirectly resulting from or related to the report made, are directed against the whistleblower. In particular, where the whistleblower is an employee of the Company outside the cases of liability for malicious intent or gross negligence or outside the cases of slander or defamation or also in cases of reports made in bad faith, the application of any discriminatory, disciplinary and/or retaliatory sanctions or measures, directly or indirectly connected to the report, is expressly prohibited. Airport Handling expressly reserves all action to protect its interests, both direct and indirect, in the event of reports made in bad faith or defamatory or slanderous, which may cause damage or prejudice of any nature to its employees, members of its corporate bodies or third parties in business relationship with the Company.