



Airport Handling

IT Platform Whistleblowing Whistleblower Manual

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Summary

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1 Glossary

1.1 Description of the terms mainly used in the document

Comunica Whistleblowing: it is the IT platform, by primary operator of the sector, made available by Airport Handling for whistleblowing.

Interested subject: any employee, collaborator, consultant, supplier and any other third party subject having a business relationship with or performing any activity in the interest of or in the name of Airport Handling.

Whistleblower: it is the person reporting the whistleblowing. Employees and collaborators being direct or indirect witnesses of illicit or irregularities in the work place.

Whistleblowing: it is the reporting of illicit or irregularities that a person, so called whistleblower, finds in a Company or in a Public Entity.

Introduction

2 Introduction

Airport Handling considers the respect of all applicable regulations related to Whistleblowing by its employees and collaborators, as well as the ethical principles at the basis of its activity (individuated in the Code of Ethics approved by the Board of Directors) as fundamental.

In this frame, Airport Handling put in place a management system for reporting and managing illicit facts or contrary to the ethical principles aforementioned which consists in an IT platform (whose technical support is entrusted to a primary operator in the sector) through which any interested subject can report facts in relation to Whistleblowing.

Reports need to be documented, detailed and have to contain information with reference to time and place when the event occurred, as well as to provide elements useful to identify of the person who committed the facts reported.

Complying to Law nr. 179 dated November 30th, 2017 about “*Disposizioni per la tutela degli autori di segnalazioni di reati o irregolarità di cui siano venuti a conoscenza nell'ambito di un rapporto di lavoro pubblico o privato*”, the IT platform grants the confidentiality of personal data and content inserted in the report, with particular reference to personal data and identity of the whistleblower which, once declared, will not be disclosed except for obligations by Law. Confidentiality is granted in order to avoid that the whistleblower, being informed of illicit conduct, abstains to signal it because of awe to consequences.

The whistleblower will be protected at any time from the chance that he/she will be subject to reactions, prejudice or retaliation of any nature, directly or indirectly consequent or connected to the report done, both during the period in which the report is managed both following it.

Particularly, if the whistleblower is an employee of Airport Handling (except from the responsibilities due to fraud or serious guilt, calumny or defamation or in case of report done in *mala fides*), the application of any sanction or revengeful measure (disciplinary and/or administrative), directly or indirectly linked to the report is expressly prohibited.

Airport Handling reserves the right to any action in defence of its interests, direct or indirect, in case of reports done in *mala fides*, defamatory or slanderous, from which damage or prejudice of any nature to its employees, Board Members or third party in business relationship with Airport Handling.

Any right of the person pointed out in the report is granted during the entire internal investigation process and, in no case, any action will be addressed against this person without any validation of the truth of the elements in the report.



Attention!

Whistleblowing reports should **NOT** be sent via email.

ANAC guidelines and law n. 179/2017 clearly state that the channel used to forward and communicate this report is to be specific for this activity and able to grant confidentiality and identity of the whistleblower.

An email address is not able to grant the adequate level of data protection of the whistleblower as required by the current regulation.

In the end, Airport Handling is committed to comply with the personal data protection regulations.

The IT platform is hosted on a website external to Airport Handling whose access is not tracked.

This manual describes the use of the IT platform to communicate whistleblowing.

How to access the IT platform

3 How to access the IT platform

Here below, please find the instructions on how the whistleblower can access the IT platform to insert and verify his/her reports.

The IT platform is available through Google Chrome browser.

In the Legal Notice section at www.airporthandling.eu clicking on the link Whistleblowing, the user has immediate access to the homepage of the IT platform (Figure 1) to insert or check his/her report.

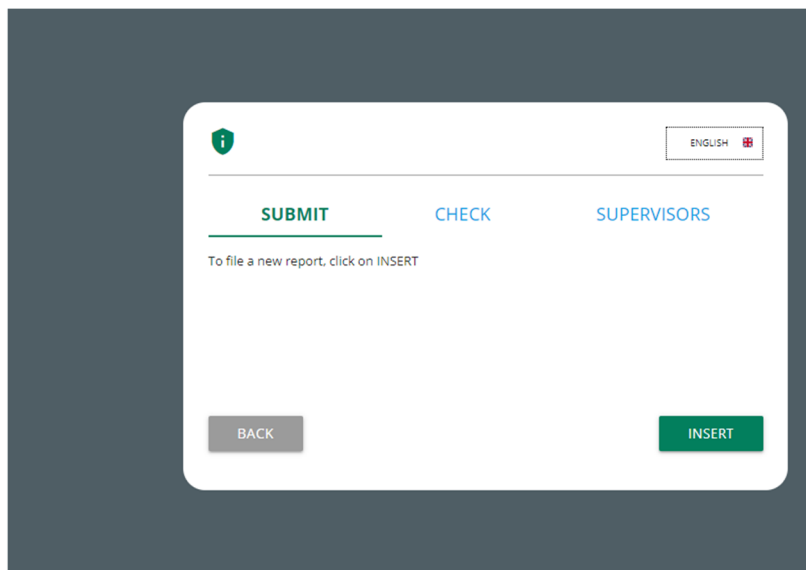


FIGURE 1

On the up right, the user can choose the favourite language (Italian or English).

How to insert a report

4 How to insert a report

Clicking on “INSERT” at (Figure 1), the user enters the section available to insert report (Figure 2).

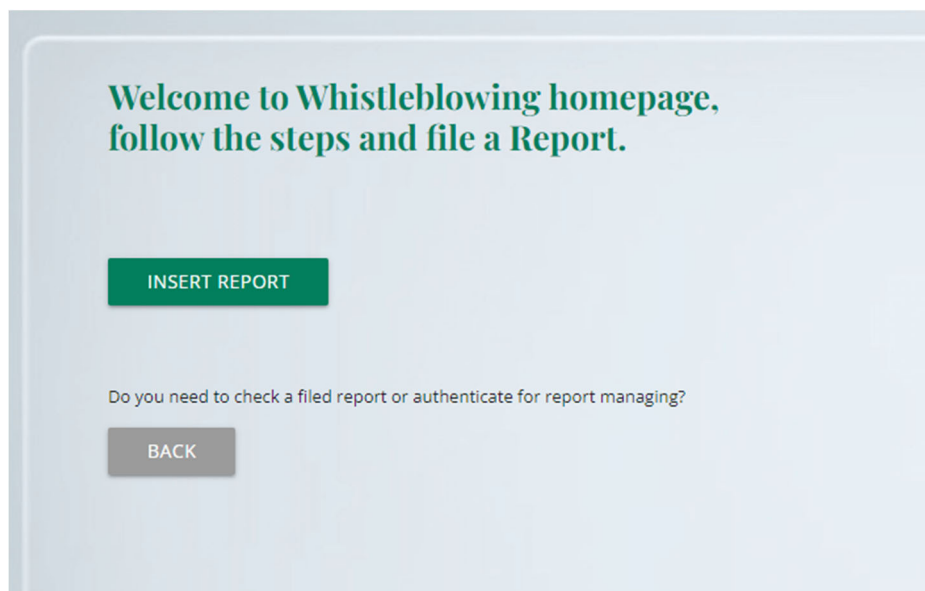
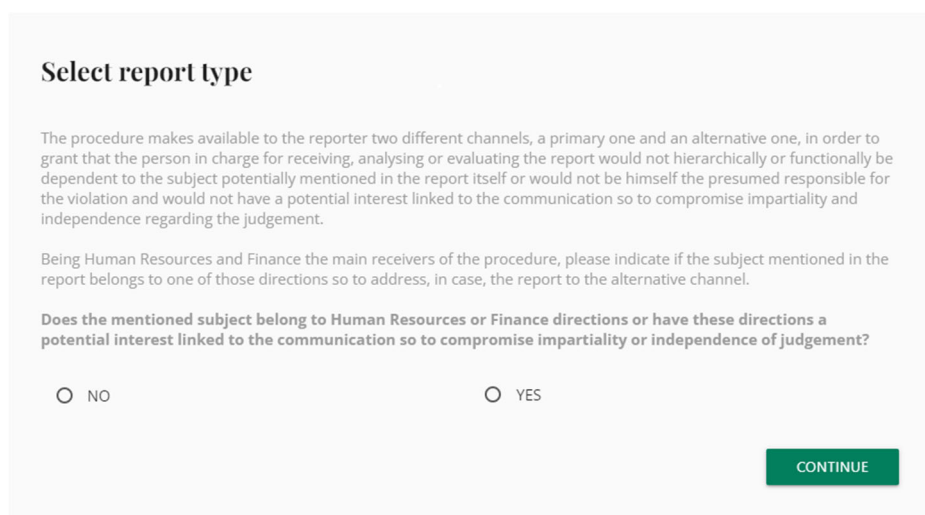


FIGURE 2

Clicking on “INSERT REPORT” a pop-up window opens (Figure 3). The user, here, chooses the channel to address the report. Once chosen, click on “CONTINUE” to go on with the questions.



The screenshot shows a form titled "Select report type" with the following content:

The procedure makes available to the reporter two different channels, a primary one and an alternative one, in order to grant that the person in charge for receiving, analysing or evaluating the report would not hierarchically or functionally be dependent to the subject potentially mentioned in the report itself or would not be himself the presumed responsible for the violation and would not have a potential interest linked to the communication so to compromise impartiality and independence regarding the judgement.

Being Human Resources and Finance the main receivers of the procedure, please indicate if the subject mentioned in the report belongs to one of those directions so to address, in case, the report to the alternative channel.

Does the mentioned subject belong to Human Resources or Finance directions or have these directions a potential interest linked to the communication so to compromise impartiality or independence of judgement?

☐ NO ☐ YES

CONTINUE (in a green button)

FIGURE 3

In the screenshot (Figure 4), the user is required to insert preliminary information.

The fields marked with the asterisk (*) are mandatory.

For some fields, the user can select the item from a list.

After replying the questions, the user can go on with the path clicking on “CONTINUE”.

How to insert a report



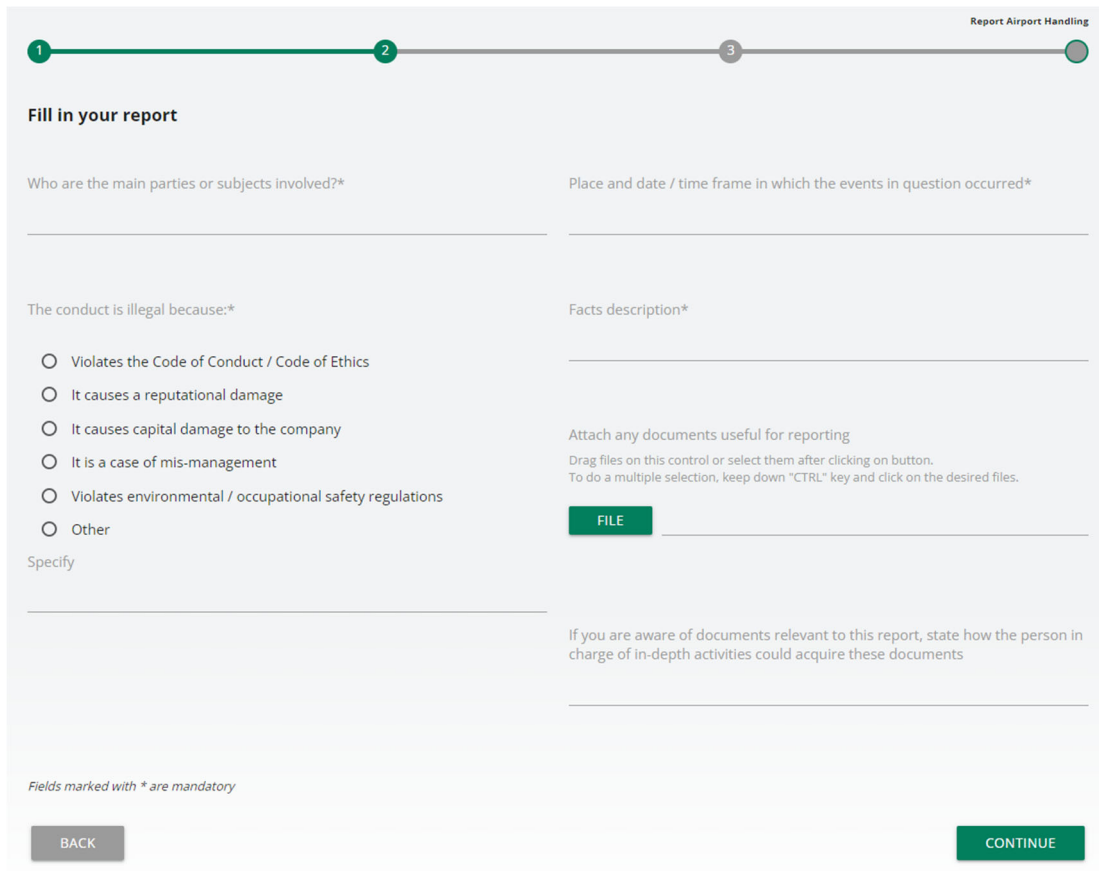
The screenshot shows the first step of a four-step process to insert a report. The progress bar at the top indicates the current step is 1. The form is titled 'Preliminary Informations'. It contains the following fields:

- A mandatory text field: 'To which company or entity does the report refer?*'.
- A dropdown menu: 'Country in which the alleged violation occurred*' with the placeholder 'Choose your option'.
- A dropdown menu: 'Which area of your company does the report refer to?*' with the placeholder 'Choose your option'.
- A text field: 'If the item is not present, insert it here'.

At the bottom, there is a note: 'Fields marked with * are mandatory'. There are two buttons: 'BACK' and 'CONTINUE'.

FIGURE 4

The report goes on with the next questions (Figure 5).



The screenshot shows the second step of the four-step process. The progress bar at the top indicates the current step is 2. The form is titled 'Fill in your report'. It contains the following fields:

- A mandatory text field: 'Who are the main parties or subjects involved?*'.
- A mandatory text field: 'Place and date / time frame in which the events in question occurred*'.
- A mandatory text field: 'The conduct is illegal because:*' with a list of radio button options:
 - Violates the Code of Conduct / Code of Ethics
 - It causes a reputational damage
 - It causes capital damage to the company
 - It is a case of mis-management
 - Violates environmental / occupational safety regulations
 - Other
- A mandatory text field: 'Facts description*'.
- A text field: 'Attach any documents useful for reporting' with instructions: 'Drag files on this control or select them after clicking on button. To do a multiple selection, keep down "CTRL" key and click on the desired files.' and a 'FILE' button.
- A text field: 'Specify'.
- A text field: 'If you are aware of documents relevant to this report, state how the person in charge of in-depth activities could acquire these documents'.

At the bottom, there is a note: 'Fields marked with * are mandatory'. There are two buttons: 'BACK' and 'CONTINUE'.

FIGURE 5

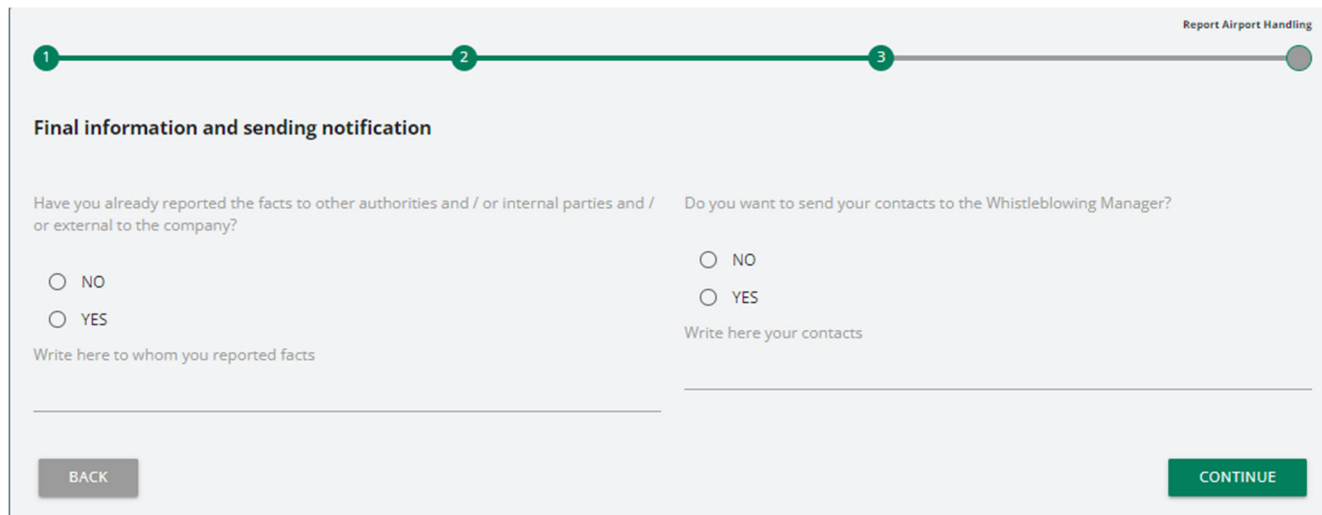
Once filled in and described the facts object of the report, the user call attach files in support of the events.

How to insert a report

After filling the fields in (Figura 5) click on “CONTINUE”.

The next step (Figure 6) brings the user to fill in final information and send the report.

The user can select what of interest and, not mandatorily, fill in the further requests. Then click on “CONTINUE”.

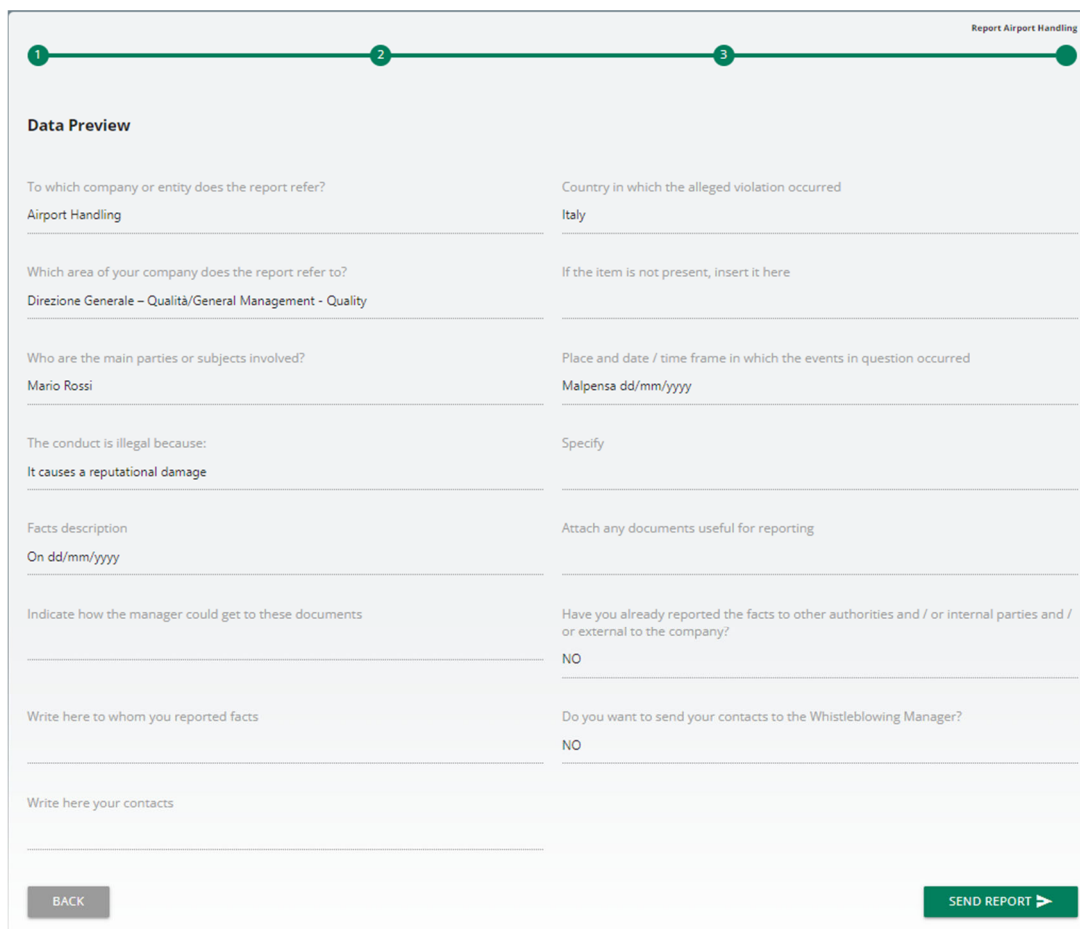


The screenshot shows a web form titled "Final information and sending notification". At the top, there is a progress bar with four steps: 1 (green), 2 (green), 3 (green), and 4 (grey). The form is divided into two columns. The left column contains the question "Have you already reported the facts to other authorities and / or internal parties and / or external to the company?" with radio buttons for "NO" and "YES", and a text input field labeled "Write here to whom you reported facts". The right column contains the question "Do you want to send your contacts to the Whistleblowing Manager?" with radio buttons for "NO" and "YES", and a text input field labeled "Write here your contacts". At the bottom left is a "BACK" button, and at the bottom right is a "CONTINUE" button. The top right corner of the form has the text "Report Airport Handling".

FIGURE 6

At this point, a summary window allows the user (Figure 7) to check the information recorded up to that moment, go back to previous questions to fill in or modify information and quit the report without sending it.

How to insert a report



Report Airport Handling

1 2 3

Data Preview

To which company or entity does the report refer?
Airport Handling

Country in which the alleged violation occurred
Italy

Which area of your company does the report refer to?
Direzione Generale – Qualità/General Management - Quality

If the item is not present, insert it here

Who are the main parties or subjects involved?
Mario Rossi

Place and date / time frame in which the events in question occurred
Malpensa dd/mm/yyyy

The conduct is illegal because:
It causes a reputational damage

Specify

Facts description
On dd/mm/yyyy

Attach any documents useful for reporting

Indicate how the manager could get to these documents

Have you already reported the facts to other authorities and / or internal parties and / or external to the company?
NO

Write here to whom you reported facts

Do you want to send your contacts to the Whistleblowing Manager?
NO

Write here your contacts

BACK SEND REPORT ➤

FIGURE 7

If all is fine, click on “SEND REPORT”.



Attention!

Once “SEND REPORT” is clicked, the report is sent to the Supervisor for the channel and, after that, there is no possibility to modify the contents or cancel the sending.

The system confirms that the report has been sent in the right manner returning the user (Figura 8) a unique code linked to the forwarded report that will be mandatory to the user to access the report in future to check its status. This code will no longer be available after the page closure.

This code allows only the user to verify at any time the status of the report and communicate to the channel in charge in case of further information or documents useful to investigate the events.

How to insert a report

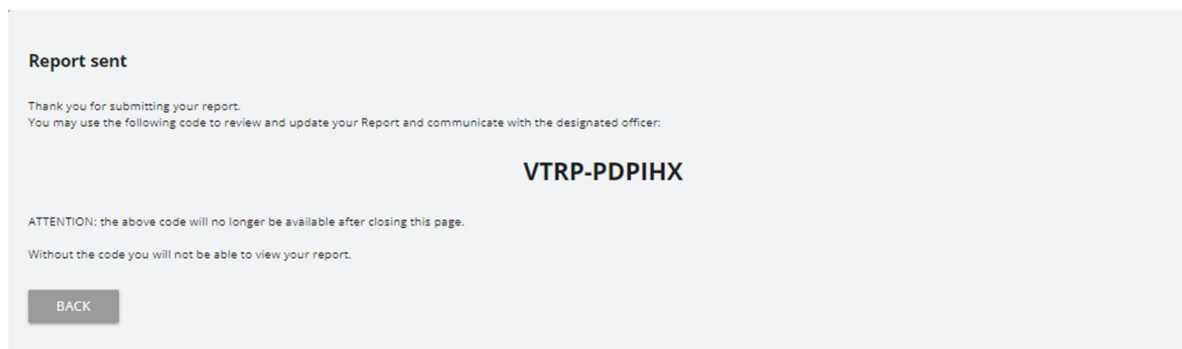


FIGURE 8



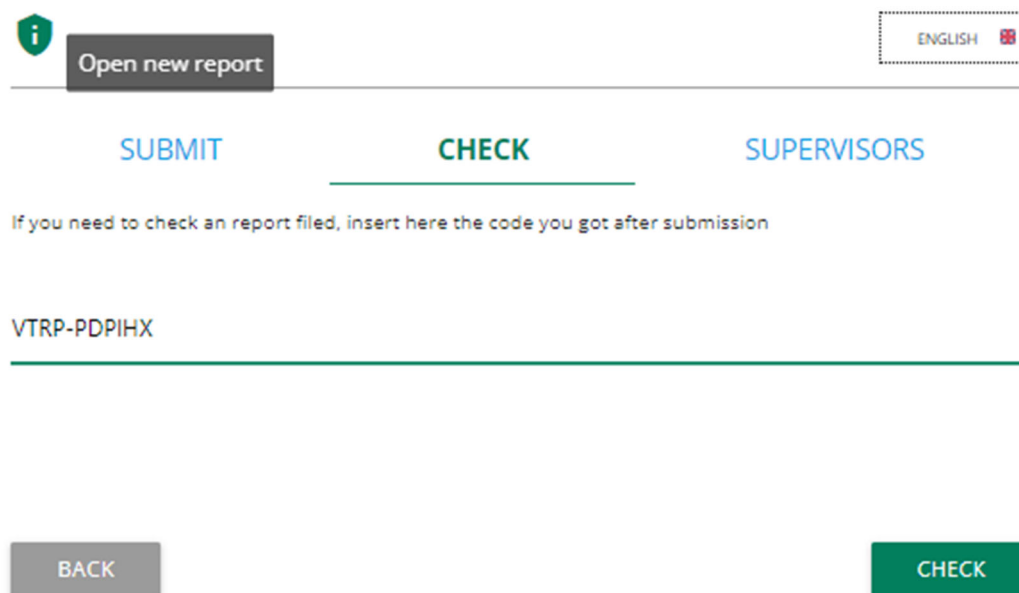
Attention!

It is full responsibility of the whistleblower to save and take care of the code given by the system in order to access the report in future and verify its status (i.e.: if it has been assigned, if internal investigation has started, if there are messages from the Supervisor of the whistleblowing management, if it has been closed and filed, etc...).

How to check a report

5 How to check a report

Once accessing the IT platform as per instruction in paragraph 3, click on “CHECK” (Figura 9) and insert the code received after sending the report.



Open new report

ENGLISH

SUBMIT CHECK SUPERVISORS

If you need to check an report filed, insert here the code you got after submission

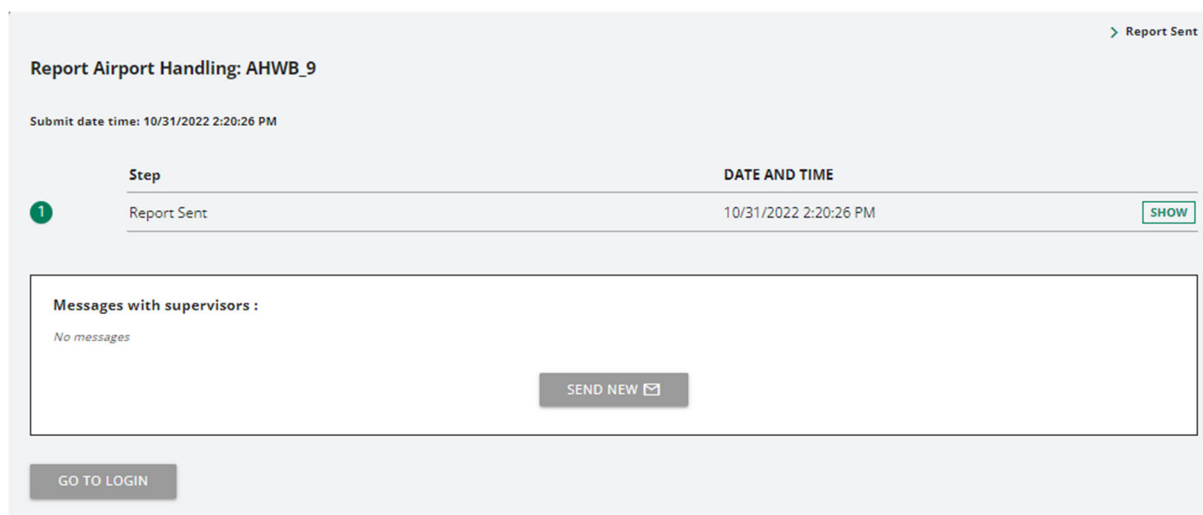
VTRP-PDPIHX

BACK CHECK

FIGURE 9

Click on “CHECK”.

The IT platform, at this point, shows the user the status of the report, identifying with date and timestamp the passage of reference (Figure 10).



> Report Sent

Report Airport Handling: AHWB_9

Submit date time: 10/31/2022 2:20:26 PM

Step	DATE AND TIME
1 Report Sent	10/31/2022 2:20:26 PM

SHOW

Messages with supervisors :

No messages

SEND NEW

GO TO LOGIN

FIGURE 10

The report can be checked clicking on “SHOW”.

The whistleblower can send a message to the Supervisors of the report or reply to their requests clicking on “SEND NEW”.

The user, at any time, can check the status of its report and give further evidences or integration to the events until the closure of the investigation.