

Implementation of the "Enex Technologies" Whistleblowing Directive

1 – Introduction

Following the approval and publication in the Official Gazette of Legislative Decree no. 24/2023, EU Directive no. 1937/2019 (the so-called "Whistleblowing Directive") was implemented.

Each person will be able to log in to make the report at the <https://enextechnologies.integrityline.com/> link (also present on our site), select the language at the top, and follow a simple guided procedure (which guarantees total anonymity).

2- What can be reported

It is possible to report behaviors, acts or omissions that harm the public interest or the integrity of the public administration or private entity. These behaviors can include:

- Administrative, accounting, civil or criminal offences.
- Unlawful conduct relevant pursuant to Legislative Decree 231/2001 or violations of the organization and management models provided for by this decree.
- Offences falling within the scope of European Union or national acts relating to the following areas:
 - Public procurement.
 - Financial services, products and markets and the prevention of money laundering and terrorist financing.
 - Product safety and compliance.
 - Transport safety.
 - Environmental protection, radiation protection and nuclear safety.
 - Food and feed safety and animal health and welfare.
 - Public health.
 - Consumer protection.
 - Protection of privacy and protection of personal data and security of network and information systems.
- Acts or omissions affecting the financial interests of the Union, relating to the internal market.

Reports related to a personal interest of the whistleblower, which relate to his or her individual employment relationships, or relating to employment relationships with hierarchically superior figures, are expressly excluded from the scope of application of the new regulations

With reference to the content, the reports must be as detailed as possible, in order to allow the assessment of the facts by the parties competent to receive and manage the reports. In particular, the following essential elements of the report must be clear, also for the purposes of the admissibility screening:

- the identification data of the reporting person (name, surname, place and date of birth), as well as an address to which subsequent updates can be communicated;
- the circumstances of time and place in which the reported event occurred and, therefore, a description of the reported facts, specifying the details relating to the circumstantial information and, where present, also the manner in which the reported facts became known;

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- the personal details or other elements that allow the identification of the person to whom the reported facts can be attributed.

3- Who can report

The list of reporting entities includes:

- workers of private sector entities;
- self-employed workers, as well as holders of a collaboration relationship (better identified in letter d));
- workers or collaborators, who carry out their work for private sector entities that provide goods or services or that carry out works in favor of third parties;
- freelancers and consultants who work for public or private sector entities;
- volunteers and trainees, paid and unpaid, who work for public or private sector entities;
- shareholders and persons with administrative, management, control, supervisory or representative functions, even if these functions are exercised on a purely de facto basis, in public or private sector entities.

4- Internal and external reporting channels

There are several reporting channels within the new regulations:

- Internal reporting channel, set up by each of the public sector entities and private sector entities; (for Enex Technologies via our reporting platform)
- External reporting channel, set up by ANAC (National Anti-Corruption Authority) or other bodies responsible for managing "external" reports, which can be used in the cases provided for by art. 6 of Legislative Decree 24/2023;

The legislator seems to have placed the reporting channels in hierarchical order.

It goes without saying that the reporting or complaining person must have reasonable and reasonable grounds to believe that the information on violations reported, publicly disclosed or reported, is true and falls within the scope of the legislation.

5- Protection measures for the whistleblower

Chapter III of Legislative Decree no. 24/2023 contains the main innovations introduced at national level, in harmony with European objectives.

The main protection relates to the protection of the whistleblower from retaliation that he or she may suffer as a result of the report.

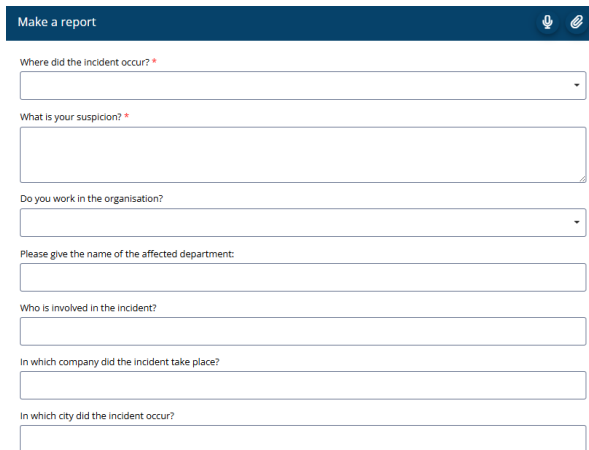
As expressly provided, in fact, reporting entities and persons cannot suffer any retaliation. Retaliation means any behavior, act or omission, even if only attempted or threatened, carried out as a result of the report, the complaint to the judicial or accounting authority or public disclosure and which causes or may cause unjust damage to the reporting person or the person who made the complaint, directly or indirectly.

But if I want to send a report, what should I do?

To send a report you must click on the "Send a report" button



Now it will be possible to send the report by answering the questions in the questionnaire.



How to submit an anonymous report

The whistleblower can decide whether to send an anonymous report or leave their data, to send an anonymous report just check the box "I want to remain anonymous" and the fields for requesting data will disappear automatically.

Creating the password

The whistleblower, after making a report, will have to access the platform using a report code that will be issued at the end of the report submission process and a password invented by the whistleblower.

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Secure Inbox

Please open a secure inbox by creating your own password, even if you have already given your contact details. In this way we can ensure that protected communication will continue to take place.

After you submit the report, you will be given a randomly generated Case ID. Please make a note of this along with your password. You must use both to log in the inbox.

Use your inbox if you want to send more information about the case or see case-related information from us. If you wish, all communication with us remains anonymous.

Once your case has been processed, you can find the answer to your request in the Secure Inbox. If you have provided your email address, you will receive an automatic notification once a message has been added. If you have chosen anonymous reporting, please log in regularly to see if you have received any message.

Enter your password

Password *

Repeat password *

For security reasons, the password invented by the whistleblower must be entered 2 times. Important, the whistleblower will have to write down the password because it will not be possible to generate a new password in case of loss.

Submitting the report

In order to send the report, the whistleblower must tick the box where he declares to have read the privacy policy and then click on "Next"

The whistleblower will then have to answer a security question

Referral code

The whistleblower must take note of the report code in order to access the platform and follow its management.

Important, the whistleblower will have to write down the report code because it will not be possible to generate a new code in case of loss.

Confirmation
Thank you. We have received your case. We will start processing the case as soon as possible.
Once your case has been processed, you can find the answer to your request in the Secure Inbox. If you have provided your email address, you will receive an automatic notification once a message has been added. If you have chosen anonymous reporting, please log in regularly to see if you have received any message.

Your Case ID: **4DCV-1029E1FD1**

 Copy Case ID to clipboard

Please make a note of the following Case ID as it is proof that you sent this report and that it was duly received. You can use it, together with your password, to log in at any time. You can view our feedback and, if you wish, enter into another, protected dialogue. Thank you

Note
You have opened a secure inbox. To log into the inbox, you must use the password you just typed in. If you forget one of your credentials (Case ID or password), you will need to submit a new report. For security reasons and protection of your anonymity, we cannot recover them.

How to access the communication management platform

To access the platform to manage communications with the managers of the report, click on the "Safe Inbox" button

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The next step will be to enter the reporting code and password.

Case access

When you create an Inbox, you will be given a Case ID, and you will choose a password. You can use the Case ID and password to log in to the Inbox in order to see if you have received any questions. All communication with us is anonymous if you wish it to be. If you forget one of your credentials (Case ID or password), you will need to submit a new report. For security reasons and protection of your anonymity, we cannot recover them.

Case ID
4DCV-1029E1FD1

Password
.....

[Cancel](#) [Login](#)

The whistleblower will now be able to see the messages (if any) that have been sent by the managers and answer any questions.

[Home](#) [Privacy policy](#) [Secure Inbox](#) [English](#) 

Secure Inbox [Logout](#) 

CORRESPONDENCECASECase ID

There are no messages.

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