

F.A.Q. - Frequently Asked Questions about WHISTLEBLOWING

1. What is whistleblowing?

"Whistleblowing" involves an individual, often an employee, reporting illegal, unethical, or improper behavior within their organization, such as fraud, corruption, discrimination, or health and safety violations. Whistleblowing laws aim to foster transparency, accountability, and integrity within organizations, while also safeguarding individuals who expose wrongdoing from retaliation or adverse actions.

2. Who can make a report?

Reports of wrongdoing can be made by any employee, including interns and volunteers, every collaborator of the company whether they are self-employed, a professional, or a consultant, shareholders, and stakeholders, as well as anyone working within the company in administrative, managerial, supervisory, oversight, or representational roles.

3. Who can I report to?

Reports can be submitted either in written form through the designated internal digital channel or orally by requesting a confidential meeting. The meeting will be scheduled within 5 working days by the third-party responsible for managing the reports. Alternatively, reports can be made externally to ANAC (National Anti-Corruption Authority) only if: a) the Company has not established an internal reporting channel; b) the whistleblower has already made a report internally and it has not been followed up on; c) the whistleblower has valid reasons to fear that if they were to make an internal report, it would not be acted upon, or they would be at risk of retaliation; d) the whistleblower believes that the violation may pose an imminent or obvious danger to the public interest. Reports to ANAC can be both in written or oral form.

4. What can I/should I report?

The reporting channel is expressly dedicated to reporting administrative, accounting, civil, and criminal wrongdoings that expose the community, the interests of the company, the assets of the company, or the company's activities to harm or danger. Therefore, the channel is intended for reporting crimes, wrongdoings, or violations committed in the workplace to protect the Company and the individuals who are victims of them. It is not intended for submitting complaints or disputes related to the personal interests of the whistleblower. Any reports of a personal nature will be directed to the relevant offices for handling, meaning that confidentiality cannot be guaranteed.

5. Who handles internal reporting?

Residencehotels Spa has entrusted the management of the channel to an external receiving entity constituted by a specialized service company. The managing entity is responsible for receiving the reports, managing and distributing them, taking appropriate steps to investigate them internally to verify their validity, providing feedback to the whistleblowers, ensuring the confidentiality of the reporting individual even towards the Company, protecting the whistleblower from possible retaliation, and initiating or ensuring the initiation of any further necessary procedures within the Company or with the relevant authorities to address the reported issue or address the wrongdoing.

6. How is my report handled?

Within 7 days of receiving the report, the internal office issues a "notice of receipt of the report" to the whistleblower. Within the following 3 months, the office processes the report and provides feedback to the whistleblower on the action that will be taken regarding the received report. During the processing of the

report, the internal office may engage in or maintain communications with the whistleblower and may request clarifications or additional information about the report.

7. How is the confidentiality of the whistleblower protected?

Confidentiality of the whistleblower is ensured throughout the entire process and all subsequent civil, criminal, or disciplinary proceedings resulting from the report. It involves maintaining secrecy regarding the identity of the whistleblower, which is known only to the internal office and may be disclosed only to those individuals responsible for receiving and acting upon the reports, except in cases where revealing the identity of the whistleblower is necessary or with the explicit consent of the whistleblower. In internal disciplinary proceedings resulting from a report, the identity of the whistleblower cannot be disclosed if the charges are based on investigations other than solely the report. However, if knowledge of the whistleblower's identity is necessary for the defense of the accused individual, it can only be revealed with the whistleblower's consent. In cases where revealing the identity of the whistleblower is necessary, written notification is provided with justification.

8. Can I make an anonymous report?

Yes. Although anonymous reports are not considered for legal confidentiality protection purposes, Residencehotels Spa has decided to accept them. An anonymous report can still be supplemented at a later stage. The internal office will handle the report regardless. If the internal investigation allows for the identification of the whistleblower, and if the other conditions under Legislative Decree no. 24/23 are met, their confidentiality will still be protected.

9. What happens if someone makes a false or malicious report about me?

A false report attributing wrongdoing to an individual who is known to be innocent and is false following the internal investigation does not warrant the protection of the whistleblower's identity. Instead, it leads to the disclosure of the malicious whistleblower's identity to the accused party for their protection in any appropriate forum and initiates disciplinary proceedings against the malicious whistleblower.

10. How is my data treated?

The personal data of the whistleblower are processed following the privacy code and the rights guaranteed by EU Regulation 679/2016. However, the rights of access, rectification, modification, deletion, oblivion, and opposition (Articles 15 to 22 of the GDPR) cannot be exercised by making a request to the data controller if exercising these rights could result in actual and concrete prejudice to the confidentiality of the identity of the employee who reported the wrongdoing.

11. How is my report stored?

The report is therefore stored digitally or in paper form by the receiving entity, and in any case, only for the time necessary for its processing and the processing of any subsequent civil, criminal, or administrative proceedings that may arise from it. The report is archived after data minimization and is deleted after 5 years from the date of archiving.