



# POLICY for the Reporting of Unlawful Conduct and Violations pursuant to Legislative Decree No. 24/2023 (so-called "Whistleblowing") and Legislative Decree No. 231/2001

## REVISION LIST

Revision	Issue date	Reason
0	26/07/2024	First issue
1	24/09/2025	Update of the MOG 231
2		
3		
4		

# POLICY for the Reporting of Unlawful Conduct and Violations pursuant to Legislative Decree No. 24/2023 (so-called "Whistleblowing") and Legislative Decree No. 231/2001

The company **TOMET MECHANICS S.R.L.** (hereinafter also referred to as the "Company"), in compliance with the provisions set out in Legislative Decree No. 24 of 10 March 2023, implementing EU Directive 2019/1937 of 23 October 2019, as also incorporated into Legislative Decree No. 231/2001 and the Organization, Management and Control Model adopted by the Company, encourages its employees and collaborators – and more generally, anyone who is permanently connected to the company structure in any capacity – **to report in good faith** any act or omission, or any attempt to circumvent laws or regulations, committed within the Company or in relation to it, that violates European Union law, national legislation, or company regulations, and that could harm the public interest or the integrity of the Company, of which they become aware in the course of their work, and in particular:

- administrative, accounting, civil, or criminal offences in general.
- criminal conduct relevant under Legislative Decree No. 231/2001, especially regarding health and safety at work and environmental protection.
- offences concerning financial services/products and markets, money laundering, public health, consumer protection, personal data protection, or the financial interests and internal market of the EU.
- other irregularities that could result in a violation of the principles, values, and/or regulations promoted by the Company, as set out in its Code of Ethics.





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At the same time, the Company reaffirms its commitment to ensuring the maximum protection of individuals who report the aforementioned violations (the so-called "Reporter" or "Whistleblower").

In particular, in a spirit of collaboration and mutual trust, the Company guarantees maximum transparency and protection in the management and processing of reports, as well as all appropriate measures aimed at ensuring the confidentiality of the whistleblower's identity and the prevention of direct or indirect retaliatory actions. The reporting channels are listed below, while the full internal procedure – describing in detail the relevant violations, the methods for handling reports, the rights and safeguards granted to whistleblowers, and the procedures for personal data processing in compliance with current Privacy regulations – is published on the company notice board and attached hereto. For submitting reports, please use the following channels:

via certified e-mail (PEC) to:

[filippo.biolo@ordineavvocaticenza.it](mailto:filippo.biolo@ordineavvocaticenza.it)

by phone at no.:

+39 0444 543629



via regular e-mail to:

[segnalazioni@melebiolofusco.it](mailto:segnalazioni@melebiolofusco.it)

In order to ensure greater independence and impartiality, the Company has entrusted the receipt and management of reports to the Supervisory Body (Organismo di Vigilanza) pursuant to Legislative Decree No. 231/2001, **attorney Filippo Biolo** of Vicenza, who is responsible for handling and processing reports in an autonomous and independent manner. The Company thus aims to encourage its employees and all those who interact with it to safely and internally report any irregular conduct, thereby promoting ethical behavior and fostering a company-wide culture based on transparency, clarity, and integrity. In the same spirit, all concerned parties are reminded that reports concerning disputes, claims, or requests of an exclusively personal nature will not be accepted.

Castelgomberto, 24/09/2025

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