

**ANNEX A)**  
**PRELIOS GROUP WHISTLEBLOWING CHANNEL PORTAL**  
**TECHNICAL MANUAL**

**Contents**

<b>1. The Portal .....</b>	<b>2</b>
<b>2. The Process .....</b>	<b>2</b>
<b>3. WHISTLEBLOWER User.....</b>	<b>4</b>
<b>Entering a new Report .....</b>	<b>4</b>
<b>Opening an Existing Report.....</b>	<b>8</b>
<b>Sending messages .....</b>	<b>9</b>
<b>4. User from Internal Audit Department/Supervisory Board .....</b>	<b>10</b>
<b>Notifications.....</b>	<b>10</b>
<b>Access.....</b>	<b>10</b>
<b>Enter Report.....</b>	<b>11</b>
<b>Find.....</b>	<b>11</b>
<b>Reporting .....</b>	<b>13</b>

## 1. The Portal

The portal is accessible via the Internet on the following URL:

<https://digitalplatform.unione fiduciaria.it/whistleblowing>

The portal uses the SaaS model, which means that it is delivered on a platform external to Prelios that guarantees that the user will remain anonymous and no technical data relevant to the network and/or device used are tracked. The Whistleblowing Portal is accessible from PC and mobile devices, 24/7.

## 2. The Process

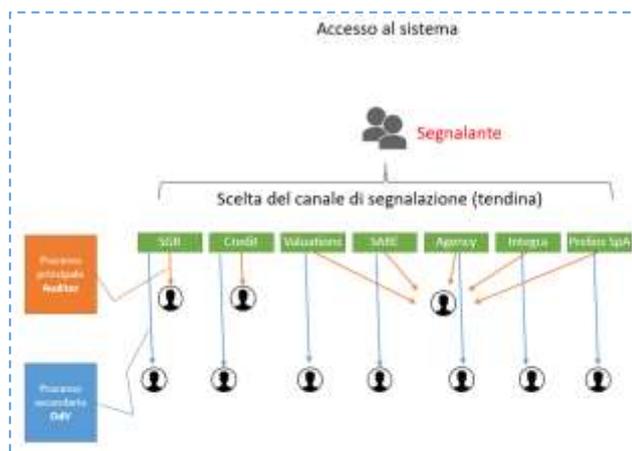
The Whistleblowing process consists of the following steps:

<b>STEP</b>	<b>Owner</b>
1) Sending the Report	Whistleblower
2) Handling	Control Departments (Audit and Supervisory Board)
3) Processing (*)	
4) Closing	

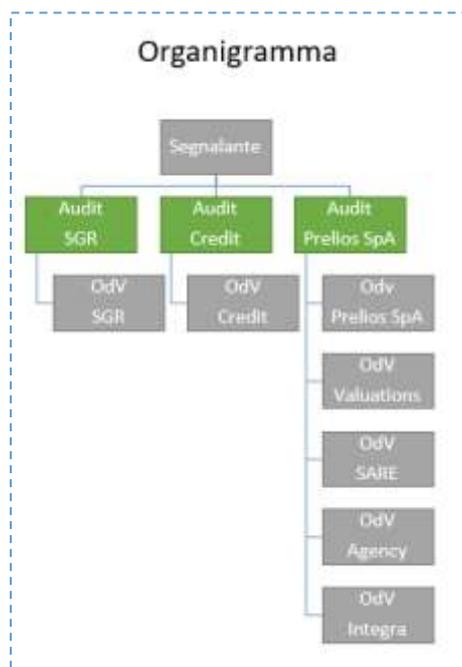
Only the Whistleblower may start the first step, and does so by opening a Report. All the following steps – which involve handling the Report - are managed by the internal control departments (Internal Audit Department and Supervisory Board).

(\*) Only in the “Processing” step is it possible to start a discussion between the Whistleblower and the Addressee of the Report through an exchange of confidential messages.

Reports will be managed on 7 independent channels, each with 2 control functions enabled for management purposes:



The organization chart of the departments authorised to access the system is as follows:



The first line of control is assigned to the Internal Audit Department, and the second to the Supervisory Board. Reports may however be handled independently by either Department, within their specific area.

For example, the Prelios Internal Audit Department may view a Report addressed to Valuations, while the Supervisory Board of Valuations will not be able to view reports addressed to other companies.

Reports may be handled together by the Internal Audit Department and the Supervisory Board: this ensures that no exclusive privileges are obtained on a Report by any Department, preventing any possible conflict of interest when a Report is made against either of the two Departments

**If there is a clear conflict of interest (the Report concerns the illegal conduct of the Internal Audit Department or the Supervisory Board), the Department in question will be suspended and will no longer be able to operate on the portal.**

***Reports may NOT be deleted from the System***

### 3. WHISTLEBLOWER User

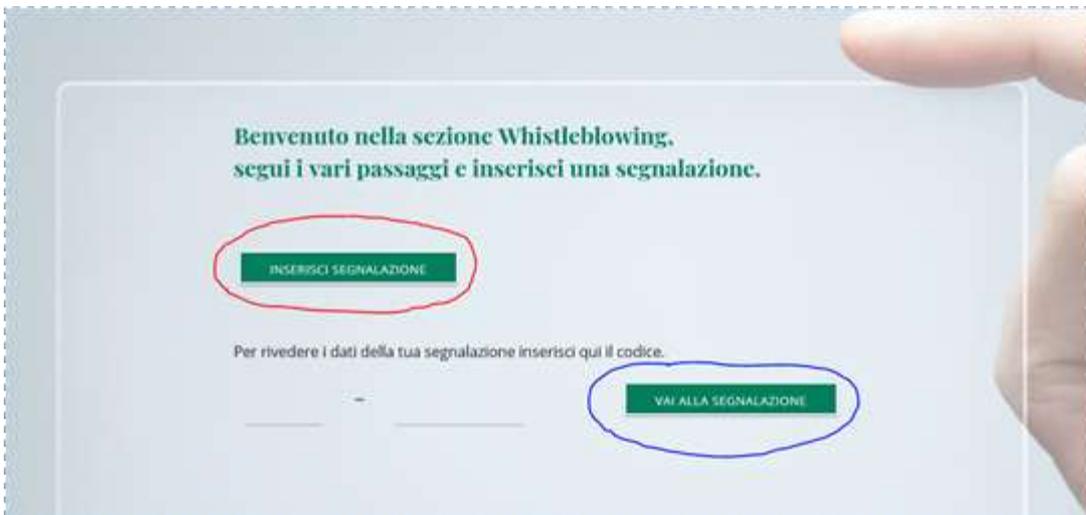
#### Entering a new Report

The Whistleblower connects to the portal and enters the “PRELIOS” token. No other login details are required, meaning that the user is fully anonymous when it uses the portal.



The Whistleblower may then

- 1) Enter a **new** Report using the “Enter Report” button
- 2) Open an **existing** Report



When the user clicks “Enter Report” he or she will be asked the name of the company to which the Report is to be sent:

## A quale società appartiene la tua segnalazione

- PRELIOS SOCIETA' DI GESTIONE DEL RISPARMIO S.P.A.
- PRELIOS CREDIT SERVICING S.P.A.
- PRELIOS VALUATIONS & e-SERVICES S.P.A.
- SERVIZI AMMINISTRATIVI REAL ESTATE S.P.A.
- PRELIOS AGENCY S.P.A.
- PRELIOS INTEGRA S.P.A.
- PRELIOS S.P.A.

**PROSEGUI**

Basic data will then be entered in three steps to contextualize the Report

- 1) Preliminary information
- 2) Report Data (dates, facts, documents)
- 3) Send Report

Some fields are required in order to make the Report less general and help the Addressee of the Report understand the data/facts provided to support the Report.

Segnalazione Whistleblowing - PRELIOS S.P.A.

### Informazioni Preliminari

Paese in cui si è verificata la presunta violazione\*

Italy

A quale area della tua azienda si riferisce la segnalazione?\*

IT & Group Purchasing

I campi contrassegnati da \* sono obbligatori

**INDIETRO**

**PROSEGUI**

1 ————— 2 ————— 3 Fine

Segnalazione Whistleblowing - PRELIOS S.P.A

## Compila la tua segnalazione

Chi sono le principali parti o soggetti coinvolti?\*

Fornitori

---

Luogo e data/rango temporale in cui si sono verificati gli eventi in questione\*

Primo trimestre 2018

---

La condotta è illecita perché\*

Concorrenza sleale

---

Descrizione dei fatti\*

Subappalto a fornitori non certificati

---

Allega eventuali documenti utili alla segnalazione

Posseggo documenti a supporto della segnalazione  
Clicca sul bottone per allegare il file

**FILE**

---

 Aggiungi Documento

Non applicabile (non ho documenti a supporto)

Sono a conoscenza di documenti utili alla segnalazione

Indicare come il responsabile potrebbe arrivare a questi documenti

---

**INDIETRO**

**PROSEGUI**

The document section is particularly important: documents may be uploaded in this section or the user may provide information on how to obtain them. There is no limit to the number or size of the documents.

Allega eventuali documenti utili alla segnalazione

Posseggo documenti a supporto della segnalazione  
Clicca sul bottone per allegare il file

**FILE**

---

 Aggiungi Documento

Non applicabile (non ho documenti a supporto)

Sono a conoscenza di documenti utili alla segnalazione

Indicare come il responsabile potrebbe arrivare a questi documenti

---

In the final step, the user may enter the details of other channels - including external (telephone, email) channels - through which the same may be contacted outside the Portal:

1 ————— 2 ————— 3 Fine

Segnalazione Whistleblowing - PRELUOS S.P.A.

## Informazioni finali e invio segnalazione

Hai già segnalato i fatti ad altre autorità e/o soggetti interni e/o esterni all'azienda?

NO  
 SI

Vuoi trasmettere i tuoi dati personali al Responsabile?\*

NO  
 SI

Inserisci qui, eventualmente, i tuoi contatti

Indica a quale autorità/funzione/soggetto

\_\_\_\_\_

\_\_\_\_\_

INDIETRO PROSEGUI

Once the Report has been completed, a preview will be displayed that the user may check before sending the Report.

1 ————— 2 ————— 3 Fine

Segnalazione Whistleblowing - PRELUOS S.P.A.

## Anteprima Documento

Pareri inclusi e verificata la presenza dell'azione

**Italy**

---

A quale area della tua azienda si riferisce la segnalazione?

**IT & Group Purchasing**

---

Chi sono le principali parti e soggetti coinvolti?

**Fornitori**

---

Congiunto e data della segnalazione in cui si sono verificati gli eventi di segnalazione

**Primo trimestre 2018**

---

Allegati eventuali documenti utili alla segnalazione

**Macro Organigramma Gruppo Prelios (Italia) Ltd**

---

La condotta è stata punita?

**Concorrenza sleale**

---

Hai già segnalato i fatti ad altre autorità o/o soggetti interni ed/o esterni all'azienda?

**NO**

---

Descrizione del fatto

**Sottappalto a fornitori non certificati**

---

Vuoi trasmettere i tuoi dati personali al Responsabile?

**NO**

---

Inserisci qui, eventualmente, i tuoi contatti

\_\_\_\_\_

\_\_\_\_\_

INDIETRO INVIA

Once the data have been sent, a code is created to allow the user to open the Report anonymously.

**N.B.: It is important to write down and keep the code in a safe place, because if it is lost it cannot be recovered**



### Opening an Existing Report

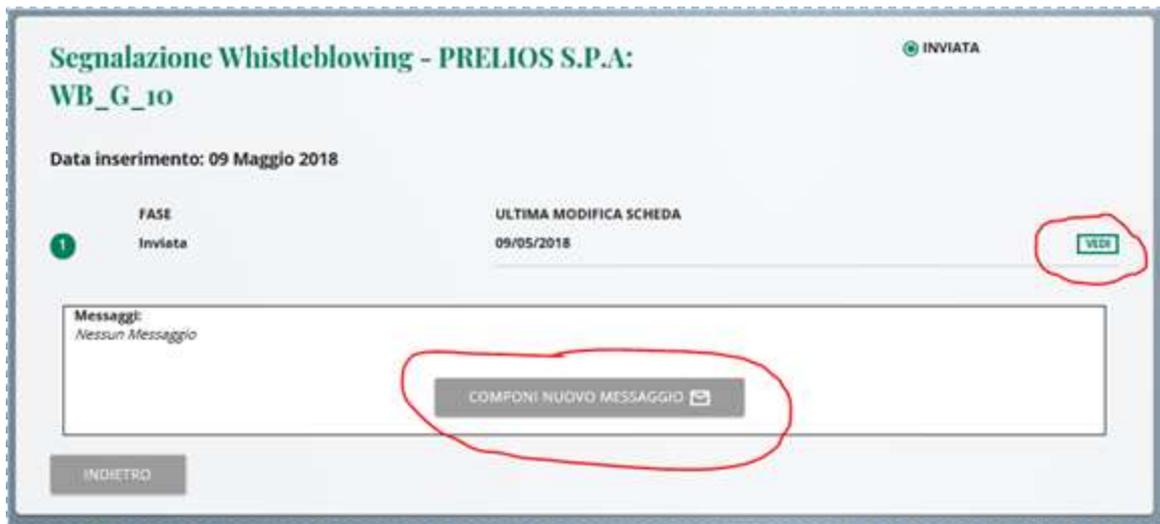
The Whistleblower may open an existing Report at any time in order to check the status of the Report and/or reply to any questions that the Addressee of the Report may have.

After entering the Report CODE:



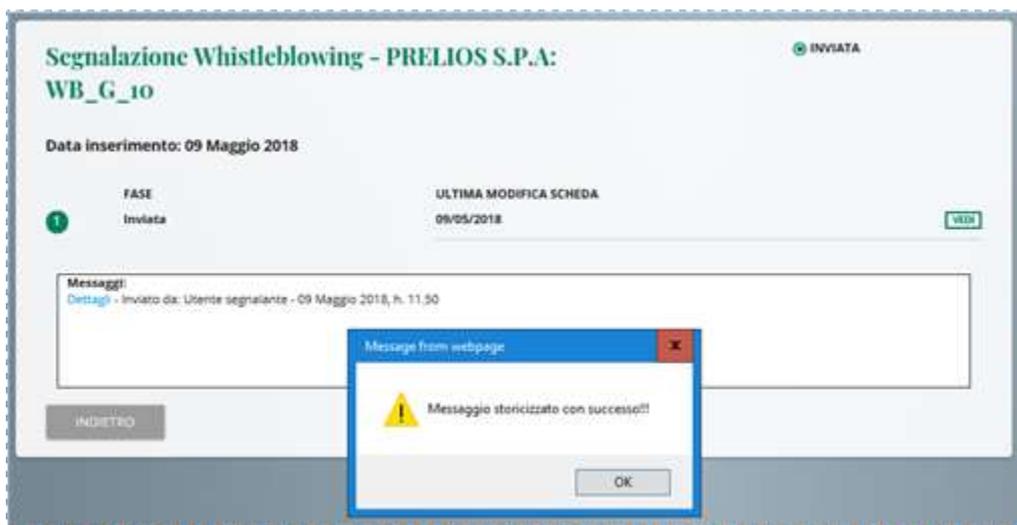
the Whistleblower may:

- display the Report
- send a message



### Sending messages

The Whistleblower may also send at any time a message in an anonymous and confidential manner that may be read only by the Addressee of the Report. There are no limits to the number of messages that may be exchanged.



#### 4. User from Internal Audit Department/Supervisory Board

##### Notifications

The Addressees of the Report will receive an email notification advising the same that a Report has been entered in the Portal. The notification will also be sent by email to the Supervisory Board of the Company involved and to the members of the Supervisory Board.

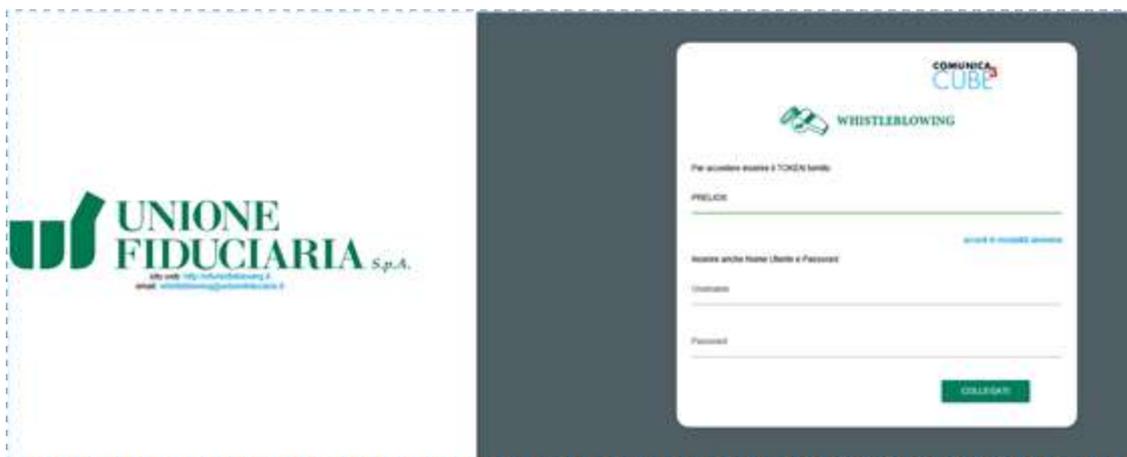


##### Access

By clicking the “Reserved Area” link, users can have access by entering

- the “PRELIOS” token
- their login details.

Only the Addressees of the Report who have customized login details may access the Portal in this way.



After logging in, the following menu will be displayed:



The following functions are available to the Addressee of the Report:

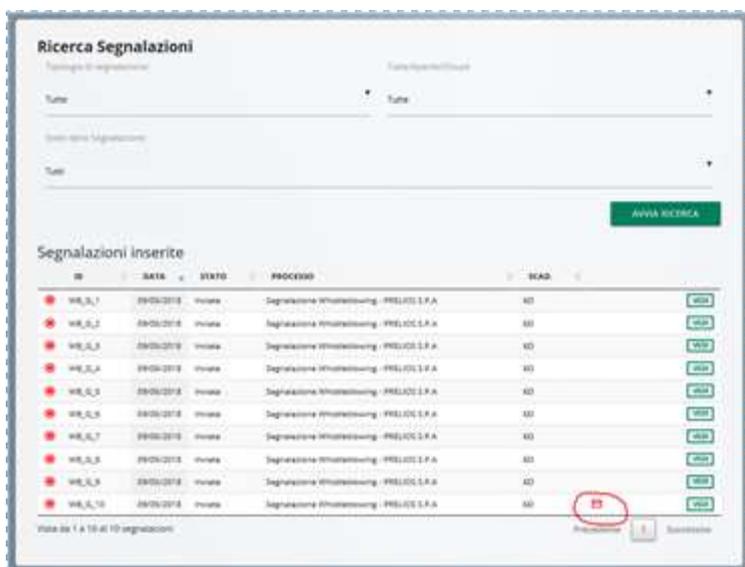
- ENTER: this function is used to enter Reports in a non-anonymous manner.
- FIND: this function is used to find the user's Reports.
- REPORT: this function provides a summary of the Reports in Excel format.

## Enter Report

Given the role of the Addressees of the Report, they are already authenticated on the Portal. They may therefore enter Reports in a non-anonymous manner, or access the system anonymously as a “normal” Whistleblower.

## Find

The Find function displays a sortable list. A red icon  indicates that there are new Reports. The Addressee of the Report may handle the Report by clicking the VIEW button and then “Confirm Handling”



**Segnalazione Whistleblowing - PRELIOS S.P.A:**  
**WB\_G\_10** INVIATA

Id Segnalazione: 90330  
**Data inserimento: 09 Maggio 2018**  
 Scadenza per la presa in carico - tra 6 giorni

FASE	ULTIMA MODIFICA SCHEDA	
1 Inviata	09/05/2018	VEDI

**Note e documenti da comunicare al segnalante nella fase di Presa in carico**

Note e documenti di presa in carico

SALVA SCHEDA

Allegati:  
 Nessun Documento Allegato

ALLEGIA DOCUMENTI

**CONFERMA PRESA IN CARICO**

Messaggi:  
 Dettagli - Inviato da: Utente segnalante - 09 Maggio 2018, n. 11,30

COMPONI NUOVO MESSAGGIO

INDIETRO

The following steps should be completed in order to close the Report:

- 1) Sent (received by the Whistleblower)
- 2) In process (handled by the Internal Audit Department or Supervisory Board)
- 3) Closure pending (final evaluation entered)
- 4) Closed (closed with comments)

A summary with all the steps will be displayed:

**Segnalazione Whistleblowing - PRELIOS S.P.A:**  
**WB\_G\_10** CHIUSA

Id Segnalazione: 90330  
**Data inserimento: 09 Maggio 2018**

FASE	ULTIMA MODIFICA SCHEDA	
1 Inviata	09/05/2018	VEDI
2 In lavorazione	09/05/2018	VEDI
3 In chiusura (Valutazione segnalazione)	09/05/2018	VEDI
4 Chiusa	09/05/2018	VEDI

Messaggi:  
 Dettagli - Inviato da: Funzione ricevente - 09 Maggio 2018, n. 16,47  
 Dettagli - Inviato da: Utente segnalante - 09 Maggio 2018, n. 11,50

COMPONI NUOVO MESSAGGIO

INDIETRO

## Reporting

In the reporting section the user may generate a summary only for the company that the Addressee of the Report may view.

The Report number and the relevant status are shown. A summary may be created in Excel format.



The screenshot shows a web interface titled "Report". Below the title, there is a label "Seleziona" followed by a dropdown menu. The dropdown menu is open, showing the selected item "Segnalazione Whistleblowing - PRELIOS S.P.A.". To the right of the dropdown menu is a green button labeled "PROSEGUI".

