



Whistleblowing Procedure for reporting offences

1. Preamble. Source of law

Given that the obligations to provide information on any conduct contrary to the provisions contained in the 231 Organizational Model fall within the broader duty of diligence and loyalty of the employee, it should be remembered that the proper fulfilment of the obligation of providing information cannot give rise to the application of disciplinary sanctions.

In particular, Law no. 179/2017 guarantees the protection of the confidentiality of the whistleblower's identity, except when the whistleblower can be held criminally and disciplinarily liable for slander and defamation and in cases where anonymity cannot be opposed by law; furthermore, no form of retaliation or direct or indirect discriminatory measures are allowed against the whistleblower for reasons directly or indirectly related to the report.

Any form of abuse of this procedure, such as manifestly opportunistic reports and/or reports made with the sole purpose of damaging the reported person or other subjects and any other hypothesis of improper use or intentional instrumentalization of the procedure for reporting offences, shall also be the source of liability in disciplinary proceedings and in other competent judiciary offices.

2. Object of the report

The report may relate to conduct, risks, offences or irregularities committed or attempted in violation of the 231 Model and the Code of Ethics. In particular, the report may concern committed or attempted actions or omissions which:

1. are criminally relevant;
2. are in violation of the Code of Conduct or other company provisions that may be subject to disciplinary sanctions;
3. may cause financial damage to the company to which he belongs;
4. may harm the image of the company to which he belongs;
5. may cause damage to the health or safety of employees or users or damage the environment;
6. may be prejudicial to users or employees or other persons who carry out their activity at the company.

3. Content of the report

The report must contain all the useful elements to ascertain the validity of the facts reported and, in particular, it must contain:

1. the personal information of the whistleblower;
2. the description of the event, the date and the place where the event occurred;
3. the author of the fact;
4. any other person aware of the fact and/or able to report on it;
5. any information that may confirm the validity of the facts set out in the report.

Terry Store-Age spa unipersonale

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At the end of the report, the signature of the whistleblower must be affixed, indicating the place and date.

4. How to submit a report

The report must be sent to the Supervisory Body (OdV) by one of the following channels:

1. registered letter with advice of delivery to the President of the OdV at the following address: Dr. Salvatore V. Castelli, Via Perosi 54, 20862 Arcore (MB), Italy;
2. certified electronic mail (PEC) address (valid in order to guarantee the integrity and delivery of the communication): odv231.terry@legalmail.it

5. How to manage the report

The OdV shall inform the Managing Director that it has received a report and shall proceed without delay to verify the validity of the report through any activity it deems appropriate, including the personal hearing of the whistleblower and any other person who may refer to the facts reported and in compliance with the principles of impartiality and confidentiality.

In managing and verifying the validity of the report, the OdV may avail itself of the collaboration of the competent company structures.

If, once the verification activity has been completed, the report proves to be well-founded, in relation to the nature of the report, the OdV shall:

1. notify the outcome of the verification to the Board of Directors which, through one of its members appointed for the purpose, shall inform the Manager responsible of the reported person in order to take the appropriate measures, including disciplinary measures if the conditions for disciplinary action are met;
2. suggest any further action that may be necessary to protect the Company;
3. suggest the Company the possibility to lodge of a complaint to the competent judicial authority.

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