

# WHISTLEBLOWING POLICY



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## **INTRODUCTION**

The present Policy is a concrete effort for the Mapei Group to face a matter of increasing importance as well as internationally dealt with by many legal systems: reporting any issues/violations and the protection of whistleblowers.

For this purpose, each Mapei Company must adhere to the guidelines set out in this document and apply locally the rules herein established.

In case a legal constrain (national or supernational) is required within the Country of operation of such Company, a local Policy on the topic shall be drafted by Mapei Companies in accordance with the present document – always informing and in coordination with the HQs.

Otherwise, if no specific legal requirements are imposed by the law, the full content of the present document is fully valid and applicable in each Mapei Company worldwide.

## **MAIN REFERENCES**

- Code of Ethics – Group document
- Anti-corruption Policy – Group document
- Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001 – adopted and applicable in Mapei Italian Companies
- Directive (EU) 2019/1937 (“*Whistleblower’s protection*”)
- Regulation (EU) 2016/679 (“*GDPR Regulation*”)
- Any applicable local law / legislation on the topic

## **POLICY PURPOSE AND RECIPIENTS**

This Policy is intended to establish the procedures for reporting unlawful conducts, misconducts or omissions, that constitute or may constitute a violation, or inducing to a violation, of the Code of Ethics, of the Anti-corruption Policy, of the rules on the areas identified by any legal provision on the topic (e.g., EU Directive on whistleblowers’ protection, etc.), and any internal documentation on the same matters (e.g., Group Policies, Procedures and Company rules).

The Recipients of this Policy are, with respect to Mapei Group:

- the Company’s top management and the members of the Company’s Corporate Bodies;
- all employees and the internal collaborators of the Company;
- partners, customers, suppliers, consultants, collaborators and, more generally, the Company’s Stakeholders (“Third Parties”).

## **SCOPE AND DEFINITIONS**

The present document is to be intended as a guideline framework, applicable with specific requirements or constraints set at local level by each Company of Mapei Group, to be in compliance with, when required by the law.

The principles herein set forth do not affect or limit in any way the obligations of reporting to competent Judicial, Surveillance or Regulatory Authorities in the Country in which the Local Company operates or where the violation takes place.

## **The Report (Whistleblowing)**

By “Report” it is meant any communication, submitted to protect the integrity of the Company, concerning possible conducts put in place, in carrying out working activities, in violation of the Code of Ethics, the Anti-corruption Policy, any local compliance regulations and any other rights and regulations or internal documents adopted by the Company in the implementation of the latter.

Reports, even if anonymous, must be submitted in good faith and must be detailed and based on precise and concordant fact-checking elements, with precise information so that they are easily verifiable.

## **WHISTLEBLOWER PROTECTION AND RESPONSIBILITY**

No retaliation, discrimination or penalty, direct or indirect, will affect those who have made a Report in good faith.

In the case of Reports made through the dedicated Whistleblowing Portal (if available within the Company or as a centralized tool provided at Group level), the anonymity of the Whistleblower is guaranteed, except in cases where the Whistleblower expresses his/her consent to disclose and without prejudice to legal obligations. There are also penalties for those who violate the Whistleblower’s protection measures.

Mapei Group guarantees the whistleblower’s anonymity and reserves the right to take appropriate action against anyone who takes reprisal or threatens to take reprisal against those who have filed whistleblowing reports in relation to this Policy.

There are penalties against the Whistleblower, whenever possible, in case of Reports made with willful intent or gross negligence that are false, baseless, with defamatory content or otherwise made for the sole purpose of harming the Company, the Reported or the ones affected by the Report. The Company may also take proper legal actions, in line with local legal framework applicable.

## **REPORTED RIGHTS**

During the investigation and the verification of possible non-compliance, individuals who are the subject of the Reports may be involved or notified of this activity, but under no circumstances a procedure will be initiated solely based on the Report, in the absence of concrete evidence on its content. This could possibly be done on the basis of other evidence found and established from the Report itself.

## **WAYS OF SENDING REPORTS**

Reports can be sent using the online [Whistleblowing Portal](#), available on a dedicated webpage of each Mapei Company’s website.

The Whistleblowing Portal is aimed at fully guaranteeing the possible anonymity of the Whistleblower. The access to the *Whistleblowing Portal* is in fact subject to a “no-log” policy in order to prevent the identification of the Whistleblower who wishes to remain anonymous: this means that the Company’s computer systems are not able to identify the access point (IP address) even if you are logged in from a computer connected to your corporate network.

For each Report submitted, the Portal assigns a unique identification code that allows each Whistleblower to check its progress, anonymously. Similarly, if a Report is not adequately detailed, the Recipients

(identified in the next paragraph) have the right to request the Whistleblower, using the Portal and always through that code, further details of what is reported.

Alternatively, reports can be sent directly to Company local recipients, according to what is set within the local Whistleblowing Policy (if drafted, in accordance with local requirements by law).

## **REPORT RECIPIENTS**

Reports are received directly by Corporate Internal Audit and are shared and managed with the support, upon necessity, of HR&Organization and Legal Corporate Departments (i.e., *Whistleblowing Team*).

Otherwise, in case the Company drafted a local Whistleblowing Policy, Reports are received by the Company's *Local Whistleblowing Officer / Team* (as locally appointed).

All the Recipients of the Report handle the latter in accordance with confidentiality principles set out in this Policy and verify its validity in accordance with its content.

## **MANAGEMENT OF REPORTS**

It is established a set of rules for managing Reports, specifically aimed at guaranteeing appropriate, timely and accurate management of the latter, in compliance with the present Policy.

The verification of the validity of the Reports will be carried out according to the following procedure.

### **Preliminary checks and investigation**

Upon reception of the Report, the *Whistleblowing Team* or the *Local Whistleblowing Officer / Team*, in case of locally drafted Policy, evaluates the information therein contained and decides how to proceed.

At the end of the investigation, the relevant information collected are analyzed and if a misconduct relevant under the perimeter of the present Policy is detected, will be defined an action plan to be implemented and the actions to be taken to safeguard the Company.

Alternatively, if after the analyses there are no sufficiently detailed elements or, in any case, the Report is unfounded, the proceeding will be dismissed and the Report will be filed, together with motivation for dismissal.

The Company may take the most appropriate disciplinary and/or legal measures to protect its rights, assets and image, against who has committed or has been involved in unlawful conducts, always in accordance with local laws and regulations.

## **DATA PROTECTION AND DATA STORAGE**

The supporting documentation pertaining the Report is archived by the competent Department at Company or Corporate level, safely and for a period of at least two years after the closing of the Report, unless differently established by the local legislation.

Any personal and sensitive information contained in the Report, including those relating to the identity of the Whistleblower and the Reported or other individuals, must be processed in accordance with the applicable rules for the protection of personal data, as established by any local applicable legislation (e.g., GDPR Regulation for EU Countries and/or local legal requirements on privacy and data protection, etc.).