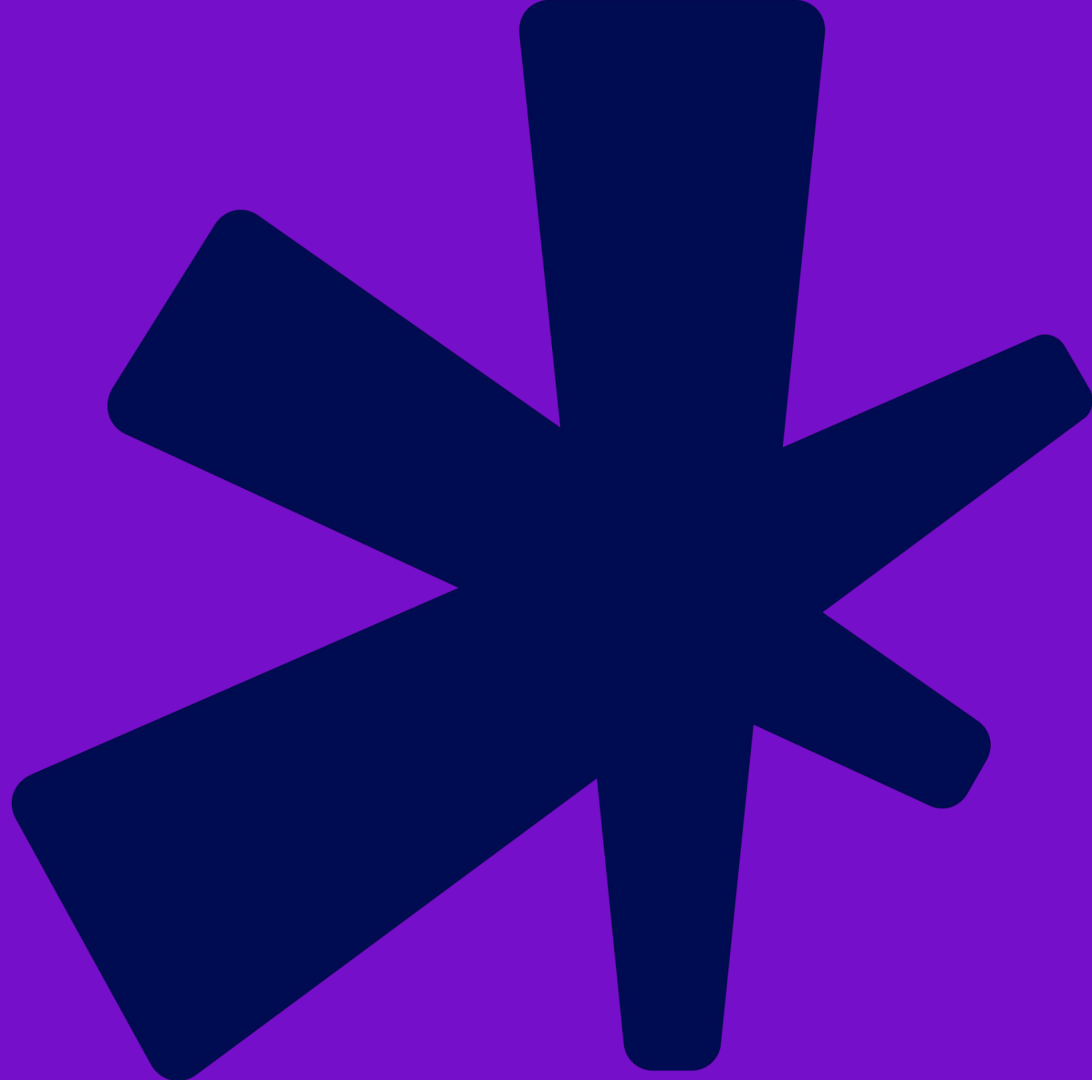


Shopfully GmbH Whistleblowing platform guidelines



Purpose and scope

These Guidelines have been prepared in order to illustrate the methods that allow the Shopfully GmbH (the “Company”) to become aware of breaches of regulatory provisions that harm the public interest or the integrity of the organisation, in order to address any problem in a timely and resolute manner.

To allow whistle-blowers to provide a report, the Company has adopted a digital communication channel ("Whistleblowing Platform") through which it is possible to notify that violations, illicit conduct, behaviours, acts or omissions that harm the public interest or the integrity of the Company that compose it have been committed.

The site to access

Whistle-blowers can send reports using the digital platform made available by Shopfully GmbH which can be consulted at the following link:

https://offeristawb_whistleblowing.keisdata.it/Home

Please remember that this communication channel, from the moment the report is received and in every subsequent phase, ensures the confidentiality of the identity of the whistle-blower during the management activities of the report and, where chosen by the whistle-blower, his/her anonymity.

In any case, carrying out acts of retaliation or discrimination, either direct or indirect, against the whistle-blower and other protected individuals, for reasons connected, directly or indirectly, to the report, is expressly forbidden.

Steps to follow

The steps to be followed for entering the report into the platform can be summarized as:

01 START

02 REPORTING CHANNEL

03 SCOPE OF THE REPORT

04 CORPORATE DATA

05 EVENT DESCRIPTION

06 ATTACHMENTS

07 DOCUMENTS

08 SEND

01 Start

On the home page, using the dropdown menu the Whistleblower can choose the platform language.



Welcome to the platform for the management of reports of wrongdoing, follow the steps to enter a new report or view the reports already entered, in total confidentiality

To review the data of your report or have updates, enter the code here :

Code Key

[ENTER THE REPORT](#)

[SUBMIT NEW REPORT](#)



Furthermore, if the Whistleblower has already made a report and wishes to monitor its progress, he/she/they can do so by entering the alphanumeric code and key associated with the report which will be provided after completing the report and clicking on *“Enter the report”* (green button on the right).



To insert a new report it is necessary to click on *“Submit new report”*.

01 Start

1 Beginning 2 Reporting Channel 3 Scope of Report 4 Company Data 5 Event Description 6 Attachments 7 Papers 8 Dispatch

All reports will be taken care of by the competent bodies; The report you are about to submit must be based on the detection of potentially unlawful conduct and based on precise and consistent facts, of which you have become aware due to the work context. In any case, the competent body is required to maintain the confidentiality of the identity of the whistleblower vis-à-vis the Company, except in cases expressly established by law (e.g. specific request by the Judicial Authority). This reporting channel ensures the confidentiality of your identity in the reporting handling activities. However, you can choose to maintain your anonymity and therefore the provision of personal data is to be understood as optional. However, this circumstance could nevertheless jeopardize the investigation: anonymous reports, in fact, will be taken into consideration only if they are adequately circumstantiated and made in great detail, so as to bring to light facts and situations related to specific contexts. Finally, we remind you that the Company, as also prescribed by the relevant legislation, has expressly provided for the prohibition of retaliatory or discriminatory acts, direct or indirect, against those who make a report for reasons related, directly or indirectly, to the report itself.

Select the Group Company to which your report relates

SHOPFULLY GMBH

[LINK TO THE INFORMATION RELEASED PURSUANT TO ART. 13 OF REGULATION \(EU\) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF WHISTLEBLOWERS](#)

☐ I declare that I have read the information on the processing of personal data

During this first phase, the Whistleblower accesses the platform in order to make a new report and will have to select the Company for which he/she/they is making the report.

Always remember to read the privacy policy before accepting it

02 Reporting Channel

Beginning 1 Reporting Channel 2 Scope of Report 3 Company Data 4 Event Description 5 Attachments 6 Papers 7 Dispatch 8

The procedure provides for a preliminary assessment of the report carried out by:

Reporting Committee Germany

Function consisting of:

Direct Channel and Report Manager:

Reporting Committee Germany

Function consisting of:

Alternative Channel, in the event that the report involves the Direct Channel Report Manager

Alternative Channel

Function consisting of:

In this section the Whistleblower sees the Reporting Committee (Direct Channel) and the Alternative Channel that will view and manage the report.

The report concerns the Function: Reporting Committee Germany

NO - CONTINUE WITH THE NORMAL PROCESS YES - SKIP PRE-ASSESSMENT

Choice of pre-assessment

The report concerns the Function: Reporting Committee Germany

NO - CONTINUE TO THE DIRECT CHANNEL YES - CONTINUE WITH THE ALTERNATIVE CHANNEL

The Whistleblower shall indicate whether he/she/they wishes to proceed with the Direct Channel or with the Alternative Channel.

03 Scope of the Report

The Whistleblower shall choose from the dropdown menu in which category he/she/they belongs

Beginning Reporting Channel Scope of Report Company Data Event Description Attachments Papers Dispatch

Category of the whistleblower

Main subject of the report

Violations

The Whistleblower shall choose from the dropdown menu the main subject of the report

04 Corporate Data

In this section the Whistleblower shall select from the dropdown menu the Company area involved in the report

Beginning Reporting Channel Scope of Report **Company Data** Event Description Attachments Papers Dispatch

Company Area

Main parties involved in the report

ADD

	Name	Surname	Role
1			

In addition, the Whistleblower has the possibility to report the main individuals involved in the report by indicating name, surname and role

05 Event Description

In this section the Whistleblower can enter the description of the event that is reporting. The description can be either textual or made through a voice recording.

✓

✓

✓

✓

1

2

3

4

BeginningReporting ChannelScope of ReportCompany DataEvent DescriptionAttachmentsPapersDispatch

You can enter a textual description of the event or ask for a face-to-face meeting or proceed with a voice recording

In case you want to proceed with the voice recording, we point out that no filters or distortions of any kind will be applied to your voice.

☐ I authorize voice recording

Enter a brief description of the event or request a face-to-face meeting



IMPORTANT: no filters nor distortions of any kind are applied to the voice of the Whistleblower if a recording is made.

06 Attachments

In this section the Whistleblower can attach any useful documents to further contextualize the report



Beginning Reporting Channel Scope of Report Company Data Event Description Attachments Papers Dispatch

In this section you can attach useful documents to substantiate your report

ADD

07 Documents

In this section the Whistleblower may indicate whether he/she/they is aware of any documents that would be useful for reporting that he/she/they does not have in his/her/their possession, as well as specify where these can be found

✓

✓

✓

✓

✓

✓

7

1

BeginningReporting ChannelScope of ReportCompany DataEvent DescriptionAttachmentsPapersDispatch

I am aware of any documents useful for reporting that are stored in

Indicate where documents are stored

Accessible through the following ways

Indicate link or path to reach the document folder

Indicate another method (e.g.: summon xyz manager)

The facts have already been reported to another authority or internal subject

☐ Yes

☐ No

In addition, the Whistleblower may report whether he/she/they has already filed a report to another internal person or body.

08 Send

In this section the Whistleblower is asked to confirm the willingness to file the report as well as the possibility to provide the identification data.

IMPORTANT: the Whistleblower is completely free to decide if he/she/they wish to provide the identification data with absolutely no repercussions on the report.



Beginning Reporting Channel Scope of Report Company Data Event Description Attachments Papers Dispatch

Please note that the competent body that will take charge of the report is required to maintain the confidentiality of the identity of the whistleblower vis-à-vis the Company, except in cases expressly established by law (for example, upon specific request by the Judicial Authority).

Do you want to pass on your contact details to the Whistleblower?

☒ Yes

☐ No

Name _____

Surname _____

Email _____

Telephone _____



IMPORTANT: this communication channel, from the moment of the report is received and in every subsequent phase, ensures confidentiality of the identity of the Whistleblower during the management activities of the report and, where chosen by the Whistleblower, his/her/their anonymity.

08 Send

Once the report has been completed, the platform will issue the alphanumeric code of the report and a related key.

The Whistleblower shall make sure to [KEEP BOTH THE ALPHANUMERIC CODE AND THE KEY.](#)

The Code and the Key are essential in order to monitor the progress of the report filed and to respond to any requests from the reporting committee.



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Code

Key

ENTER THE REPORT

SUBMIT NEW REPORT

Thank you!

***SHOPFULLY**