



**Guidelines for sending internal reports through the platform**

# Purpose and scope

These Guidelines have been prepared in order to illustrate the methods that allow 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 S.p.A., which can be consulted at the following link:

<https://whistleblowing.shopfully.com/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:

- 1 Start
- 2 Reporting channel
- 3 Scope of the report
- 4 Corporate Data
- 5 Event Description
- 6 Attachments
- 7 Documents
- 8 Send

# Start

1 On the home page, using this drop-down menu you can choose the platform language.

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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

To insert a new report it is necessary to press on «Insert new report»

Furthermore, if the user has already made a report and wishes to monitor its progress, he/she can do so by entering the alphanumeric code and key associated with the report which will be provided after making the report, and pressing on “Enter the report”

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# Start

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

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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 substantiated 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 S.p.A.

[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



It is important that the user reads the **privacy policy**.

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# Reporting channel

2

In this section, the user views the Reporting Committee (Direct Channel) of the Alternative Channel that will view and manage the report.

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Progress bar: 1. Beginning (checked), 2. Reporting Channel (active), 3. Scope of Report, 4. Company Data, 5. Event Description, 6. Attachments, 7. Papers, 8. Dispatch

Your report will be subject to a pre-assessment of validity by the dedicated function. If the report concerns one or more subjects of this function, as indicated below, you can proceed directly by selecting the Direct or Alternative Channel as reported. If the report is deemed to be well-founded, it will then be sent to the person in charge of the report chosen by you below from those proposed by the Company (Direct Channel or Alternative Channel) so that it can continue with the necessary checks and investigations.  
**The procedure provides for a preliminary assessment of the report carried out by:**

Reporting Committee - Italy

Function consisting of:

- Fabrizio Martinez Maria (Internal Control Manager)
- Bertinetti Francesca (General Counsel)

**Direct Channel and Report Manager:**

Reporting Committee - Italy

Function consisting of:

- Fabrizio Martinez Maria (Internal Control Manager)
- Bertinetti Francesca (General Counsel)

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

Alternative Channel

Function consisting of:

- Pianzi Michele (Chief of Staff)

The report concerns the role : Group Pre-Assessment Whistleblowing ? Reporting Committee - Italy

Pre-evaluation choice

The report concerns the Function of the Direct Channel function ? Reporting Committee - Italy

Channel Choice

In addition, the whistle-blower must indicate whether he/she wishes to proceed with the Direct Channel or with the Alternative Channel should the report concern Direct individuals and/or Recipients.

# Scope of the report

3 In this section the user must select the category of individuals to which he/she belongs.

The categories to choose from are:

- Employees (including during the probationary period)
- Collaborators
- Consultants
- Former employees
- Candidates
- Trainees, interns
- Shareholders
- Associates
- Members of the administrative, management or supervisory body, including non-executive directors
- Suppliers or employees of suppliers
- Contractors or employees of contractors
- Subcontractors or employees of subcontractors
- Volunteers
- Other

The screenshot shows a multi-step reporting process. A progress bar at the top has eight steps: 1. Start (checkmark), 2. Reporting channel (checkmark), 3. Scope of the report (highlighted with a red circle and a red arrow from the text above), 4. Corporate Data, 5. Event Description, 6. Attachments, 7. Documents, and 8. Send. Below the progress bar, the 'Scope of the report' section is active. It has a header 'Category of the reporting party' with a dropdown menu showing 'Former employees'. Below this is the 'Main subject of the report' section, which has a header 'Violations' and a text input field containing 'Infringements falling within the scope of the Union acts set out in the Annex in respect of the following areas'. A red arrow points from the text 'Furthermore, the reporting party must select the subject of the report.' to this input field. The top of the page features the 'SHOPFULLY' logo, a language selector set to 'EN', and the 'Modulo Whistleblowing powered by KEIS DATA' logo.

Furthermore, the reporting party must select the subject of the report.

# Corporate Data

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In this section, the user must select the Company Area involved in the report

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✓

✓

✓

4

5

6

7

8

Start

Reporting channel

Scope of the report

Corporate Data

Event Description

Attachments

Documents

Send

Company Area

Main subjects involved in the report

ADD

Name

Surname

Role

1

In addition, the whistle-blower has the possibility to report the Main Individuals involved in the report, indicating Name, Surname and Position.

# Event Description

5

In this section, the user can request a meeting with the reporting committee, enter a description of the event that he/she witnessed and wants to report via the platform. The description can be textual or through a voice recording.

The screenshot shows a multi-step reporting process. At the top, there are logos for 'SHOPFULLY' and 'Modulo Whistleblowing powered by KEIS DATA'. Below these is a progress bar with eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description', 'Attachments', 'Documents', and 'Send'. The first four steps have a red checkmark icon, while 'Event Description' has a red circle with the number '5'. Steps 'Attachments', 'Documents', and 'Send' have black circles with numbers '6', '7', and '8' respectively. A large red arrow points from the '5' in the progress bar down to the 'Event Description' section. This section contains the text: 'You can enter a text description of the event or ask for a direct meeting or proceed with a voice recording' and 'If 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.' Below this is a checkbox labeled 'I authorize voice recording'. At the bottom is a large text input area with the placeholder text 'Enter a brief description of the event'.

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Start Reporting channel Scope of the report Corporate Data Event Description Attachments Documents Send

You can enter a text description of the event or ask for a direct meeting or proceed with a voice recording

If 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

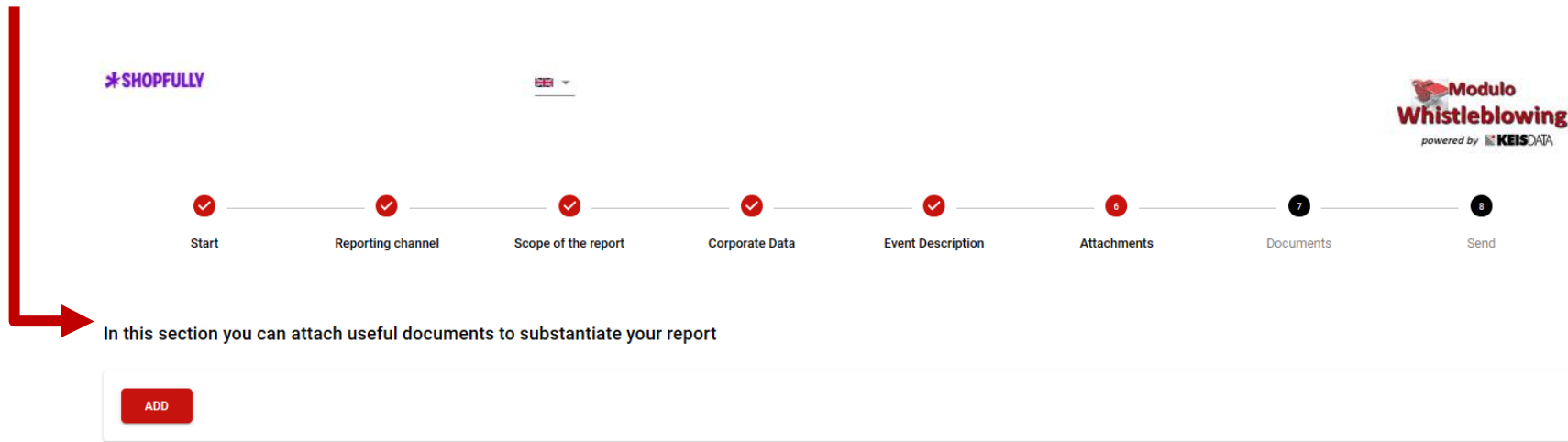
**IMPORTANT:** no filters or distortions of any kind are applied to the voice if a recording is made.

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# Attachments

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In this section the user can attach any useful documents to further contextualise the report.



# Documents

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

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Start



Reporting channel



Scope of the report



Corporate Data



Event Description



Attachments



Documents



Send

I am aware of documents useful for reporting filed in

Indicate where the documents are stored

Reachable in the following ways

Indicate link or path to reach document folder

Indicate another method (ex: summon responsible person xyz)

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

☐ Yes

☐ No

In addition, the whistleblower may report whether he or she has already reported the offence to another internal person or authority.

# Send

8

In the last screen, the user is asked to confirm his/her willingness to transmit the report, as well as the possibility of providing their identification data.

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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 send your contacts to the Reporting Manager?

- ☒ Yes  
☐ No

Name

Surname

Email

Phone

**PLEASE NOTE** that this communication channel, from the moment the report is received and in every subsequent phase, ensures not only the confidentiality of the identity of the person making the report during the management activities of the report, but also his/her anonymity if the whistle-blower does not wish to provide personal information.

# Assignment of alphanumeric code and key

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Once the report has been completed, the platform will issue the alphanumeric code of the report and the related key to the whistle-blower.

**MAKE SURE YOU KEEP BOTH THE CODE AND THE KEY!!!**

The Code and the Key are essential to be able to monitor the progress of the report and to respond to any requests for clarification or integration of the information.