



Whistleblowing platform guidelines

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 Offerista Group 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:

- 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.

fferista
Transforming Retail

Modulo
Whistleblowing
powered by KEISDATA

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

To review your report information or get updates, enter the CODE and KEY here

Code Key

ENTER IN YOUR REPORT

WHISTLEBLOWING - ENTER NEW REPORT OF BREACHES

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”

Start

1
bis

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

All reports will be dealt with by the competent bodies; the report you are about to submit must be based on the detection of potentially illegal conduct and based on precise and consistent factual elements, of which you have come to know due to the working context. In any case, the competent body is required to maintain the confidentiality of the identity of the reporting party vis-à-vis the Company, except in cases expressly established by law (eg. Specific request by the Judicial Authority). This reporting channel ensures the confidentiality of your identity in reporting management activities. You can still choose to keep your anonymity and therefore the provision of personal data is to be understood as optional. However, this circumstance could nevertheless prejudice the investigation: anonymous reports, in fact, will be taken into consideration only if they are presented adequately detailed and made in great detail, in order to bring out facts and situations related to specific contexts. Finally, we remind you that the Company, as also required by the relevant legislation, has expressly provided for the prohibition of retaliation or discriminatory acts, direct or indirect, against anyone who makes a report for reasons connected, directly or indirectly, to the report itself.

Select the Group Company to which your report relates

OFFERISTA GROUP GMBH

[LINK TO THE INFORMATION RELEASED IN ACCORDANCE WITH ART. 13 OF REGULATION \(EU\) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF SUBJECTS REPORTING OFFENSES](#)

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

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

Reporting channel

2

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.

The screenshot shows a reporting process flowchart with eight steps: 1. Beginning (checked), 2. Reporting Channel (active), 3. Scope of Report, 4. Company Data, 5. Event Description, 6. Attachments, 7. Papers, and 8. Dispatch. Below the flowchart is a text block explaining the pre-assessment process and the procedure for a preliminary assessment. The form contains three sections: 'Reporting Committee Germany' with a list of names (Heermann Carline, Bertinetti Francesca), 'Direct Channel and Report Manager' with the same list of names, and 'Alternative Channel, in the event that the report involves the Direct Channel Report Manager' with the name Foti Maria.

The screenshot shows a decision form with two sections. The first section is titled 'The report concerns the Function: Reporting Committee Germany' and has two buttons: 'NO - CONTINUE WITH THE NORMAL PROCESS' and 'YES - SKIP PRE-ASSESSMENT'. Below this is a 'Choice of pre-assessment' dropdown menu. The second section is titled 'The report concerns the Function: Reporting Committee Germany' and has two buttons: 'NO - CONTINUE TO THE DIRECT CHANNEL' and 'YES - CONTINUE WITH THE ALTERNATIVE CHANNEL'. At the bottom is a 'Channel Selection' dropdown menu.

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

The screenshot shows the fferista reporting interface. At the top left is the fferista logo with the tagline 'Transforming Retail' and a UK flag. At the top right is the 'Modulo Whistleblowing' logo, powered by KEISDATA. A progress bar below the logo shows eight steps: 1. Start (checked), 2. Reporting channel (checked), 3. Scope of the report (active, highlighted in red), 4. Corporate Data, 5. Event Description, 6. Attachments, 7. Documents, and 8. Send. Below the progress bar, the 'Category of the reporting party' is set to 'Former employees'. The 'Main subject of the report' section is titled 'Violations' and contains a text input field with the value 'Infringements falling within the scope of the Union acts set out in the Annex in respect of the following areas' and a dropdown menu showing 'Food and feed safety and animal health and welfare'.

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

Corporate Data

4

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

The screenshot shows a multi-step process for reporting a whistleblowing incident. The steps are: Start, Reporting channel, Scope of the report, Corporate Data (current step), Event Description, Attachments, Documents, and Send. The 'Corporate Data' step is highlighted with a red circle and a red checkmark. Below the progress bar, there is a dropdown menu for 'Company Area'. Below that, there is a section titled 'Main subjects involved in the report' which contains a table with columns for 'Name', 'Surname', and 'Role'. The table has one row with a trash icon and the number '1' in the first column, and empty input fields for the other columns. An 'ADD' button is located at the top left of the table.

ffferista Transforming Retail

Modulo Whistleblowing powered by KEISDATA

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

Company Area

Main subjects involved in the report

	Name	Surname	Role
1	<input type="text"/>	<input type="text"/>	<input type="text"/>

ADD

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.

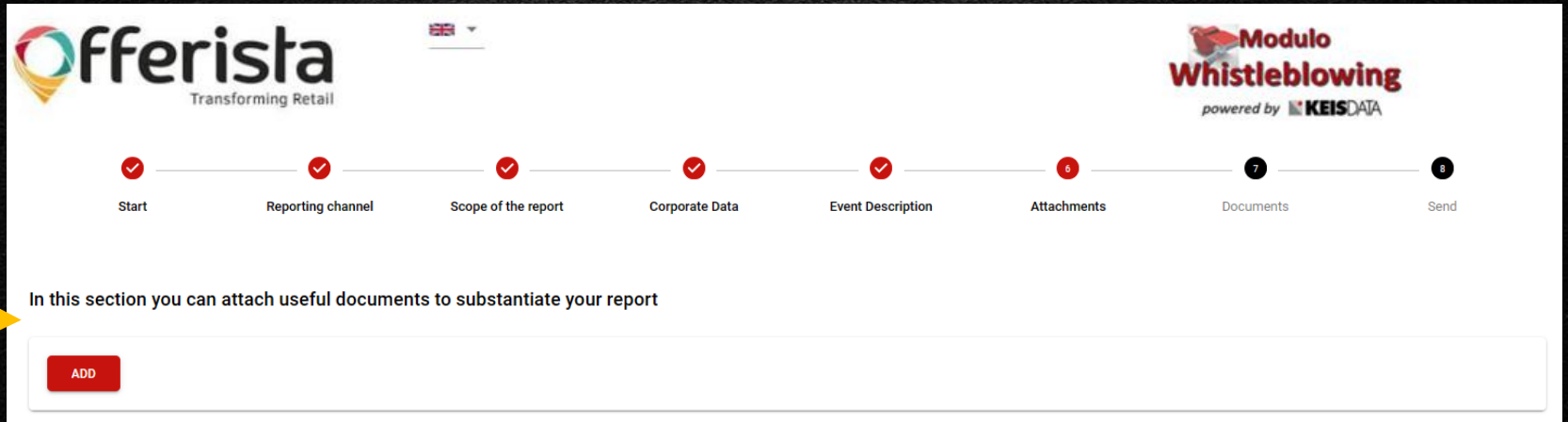
The screenshot shows a multi-step reporting process. The steps are: Start, Reporting channel, Scope of the report, Corporate Data, Event Description (current step), Attachments, Documents, and Send. The 'Event Description' step is highlighted with a red circle and the number 5. Below the progress bar, there is a text input field with the placeholder 'Enter a brief description of the event'. Above the input field, there is a checkbox labeled 'I authorize voice recording' and a warning message: '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.'

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

Attachments

6

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

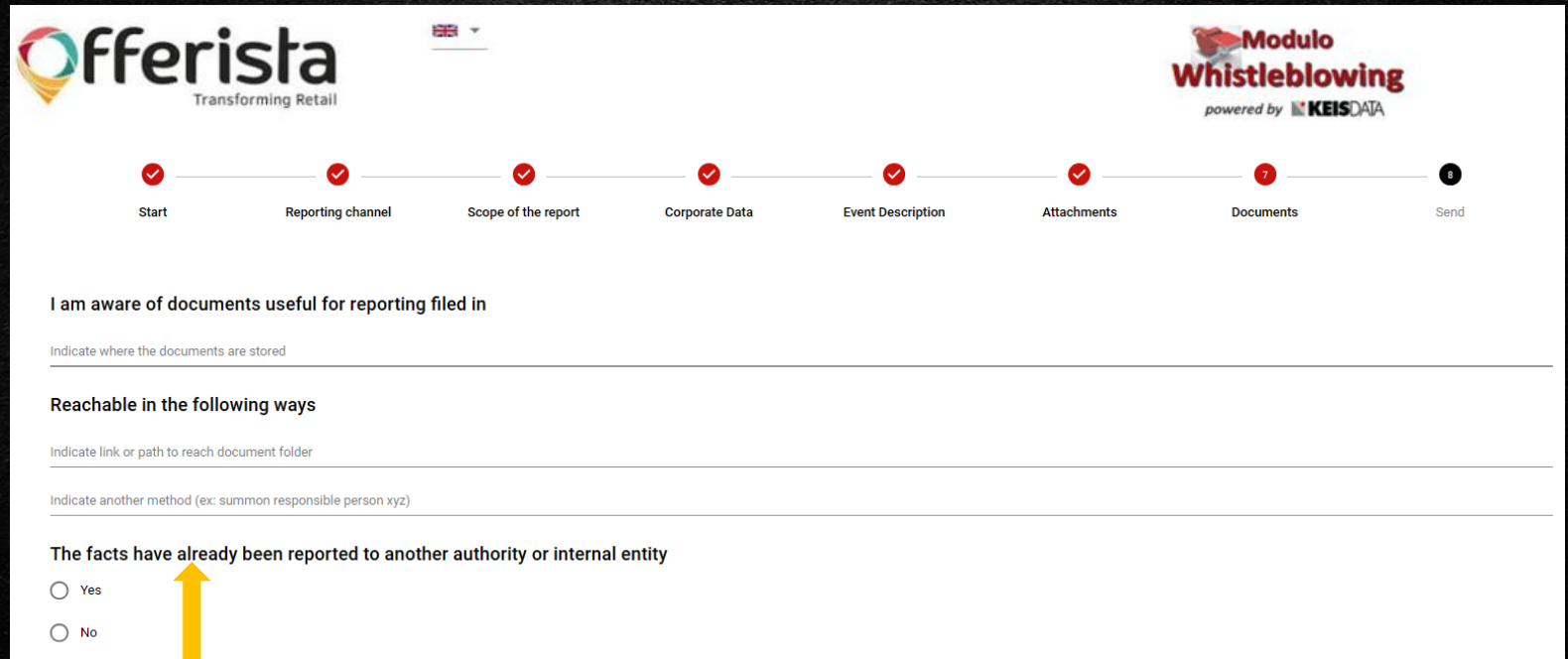


The screenshot shows a reporting interface for 'fferista' (Transforming Retail) and 'Modulo Whistleblowing' (powered by KEISDATA). A progress bar at the top indicates the current step is 'Attachments' (6), with previous steps 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', and 'Event Description' marked as complete with red checkmarks. The next steps are 'Documents' (7) and 'Send' (8). Below the progress bar, the text reads: 'In this section you can attach useful documents to substantiate your report'. A red 'ADD' button is visible in a white box below the text.

Documents

7

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.



The screenshot shows the 'fferista' reporting interface. At the top left is the 'fferista' logo with the tagline 'Transforming Retail'. To its right is a dropdown menu showing the United Kingdom flag. On the top right is the 'Modulo Whistleblowing' logo, with 'powered by KEISDATA' below it. A progress bar below the logos consists of eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description', 'Attachments', 'Documents', and 'Send'. The first six steps have a red checkmark icon, while the 'Documents' step has a red circle with the number '7' inside, and the 'Send' step has a black circle with the number '8' inside. Below the progress bar, the 'Documents' section contains the following text and form fields:

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.

The screenshot shows the 'Send' step of a reporting process. At the top left is the 'fferista' logo with the tagline 'Transforming Retail' and a flag icon. At the top right is the 'Modulo Whistleblowing' logo, powered by 'KEIS DATA'. Below the logos is a progress bar with eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description', 'Attachments', 'Documents', and 'Send'. The first seven steps have a red checkmark, while the 'Send' step has a red circle with an exclamation mark. Below the progress bar is a text block: '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)'. Below this is a question: 'Do you want to send your contacts to the Reporting Manager?' with two radio button options: 'Yes' (selected) and 'No'. At the bottom are four input fields labeled 'Name', 'Surname', 'Email', and '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

8



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

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.