



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

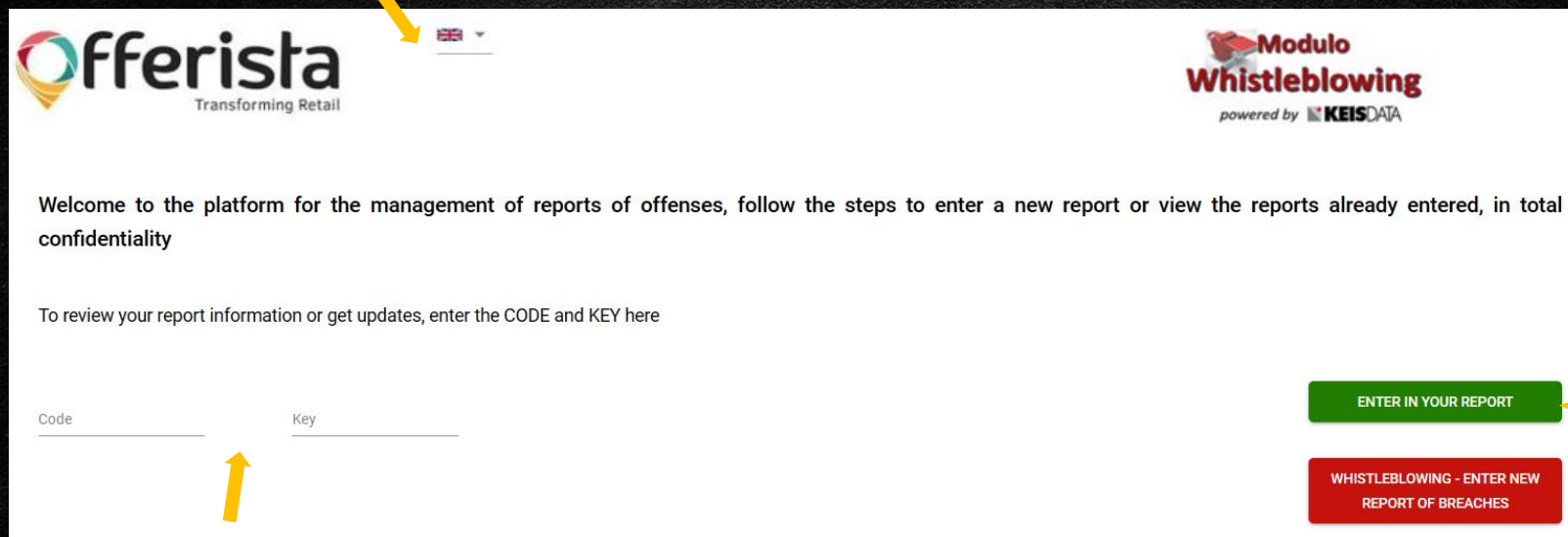
The steps to be followed for entering the report into the platform can be summarized as:

- 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.



The screenshot shows the fferista platform interface. At the top left is the fferista logo with the tagline 'Transforming Retail'. To its right is a language drop-down menu showing the UK flag, with a yellow arrow pointing to it from the instruction above. At the top right is the 'Modulo Whistleblowing' logo, powered by KEISDATA. Below the logos, a welcome message reads: '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'. Below this, a prompt says: 'To review your report information or get updates, enter the CODE and KEY here'. There are two input fields labeled 'Code' and 'Key', with a yellow arrow pointing to the 'Code' field from the instruction below. To the right of the input fields are two buttons: a green button labeled 'ENTER IN YOUR REPORT' and a red button labeled 'WHISTLEBLOWING - ENTER NEW REPORT OF BREACHES'. A yellow arrow points to the green button from the instruction on the right.

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.

offerista Transforming Retail

Modulo Whistleblowing
powered by KEISDATA

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.

Reporting Channel

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 Germany

Function consisting of:

- Heermann Carline (Head of People and Culture of Offerista and Yagora)
- Bertinetti Francesca (Digital Business Unit General Counsel)
- Aparo Caterina (Legal Expert)

Direct Channel and Report Manager:

Reporting Committee Germany

Function consisting of:

- Heermann Carline (Head of People and Culture of Offerista and Yagora)
- Bertinetti Francesca (Digital Business Unit General Counsel)
- Aparo Caterina (Legal Expert)

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

Alternative Channel

Function consisting of:

- Foti Maria (Digital Business Unit CFO)

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**

Channel Selection

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 displays the 'fferista' reporting platform interface. At the top, the logo 'fferista Transforming Retail' is on the left, and 'Modulo Whistleblowing powered by KEIS DATA' is on the right. A progress bar with eight steps is shown: 'Start' (checked), 'Reporting channel' (checked), 'Scope of the report' (active, highlighted with a red circle and number 3), 'Corporate Data' (4), 'Event Description' (5), 'Attachments' (6), 'Documents' (7), and 'Send' (8). 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 shows a selected option: 'Infringements falling within the scope of the Union acts set out in the Annex in respect of the following areas' with a sub-option '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 displays the Fferista reporting interface. At the top left is the Fferista logo with the tagline 'Transforming Retail'. To its right is a language dropdown menu showing the UK flag. On the top right is the 'Modulo Whistleblowing' logo, noted as 'powered by KEIS DATA'. Below the logos is a progress bar with eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data' (the current step, marked with a red circle and number 4), 'Event Description', 'Attachments', 'Documents', and 'Send'. The 'Start', 'Reporting channel', and 'Scope of the report' steps are marked with red checkmarks. Below the progress bar is a 'Company Area' dropdown menu. Underneath is a section titled 'Main subjects involved in the report'. This section contains a table with three columns: 'Name', 'Surname', and 'Role'. There is an 'ADD' button in the top left corner of the table. The table has one row with the index '1' and a trash icon in the first column, and empty input fields for 'Name', 'Surname', and 'Role' in the subsequent columns.

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

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 the 'fferista' reporting platform interface. At the top left is the 'fferista' logo with the tagline 'Transforming Retail'. To its right is a UK flag and a dropdown arrow. On the top right is the 'Modulo Whistleblowing' logo, with 'powered by KEISDATA' below it. A progress bar spans the width of the page, with eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description' (the current step, marked with a red '5'), 'Attachments', 'Documents', and 'Send'. Below the progress bar, the text reads: 'You can enter a text description of the event or ask for a direct meeting or proceed with a voice recording'. This is followed by a note: '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'.

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 displays the Offerista reporting interface. At the top left is the Oofferista logo with the tagline "Transforming Retail" and a UK flag dropdown menu. At the top right is the "Modulo Whistleblowing" logo, noted as "powered by KEISDATA". A progress bar below the header shows eight steps: "Start", "Reporting channel", "Scope of the report", "Corporate Data", "Event Description", "Attachments", "Documents", and "Send". The first five steps are marked with red checkmarks, while "Attachments" is marked with a red circle containing the number 6. "Documents" is marked with a black circle containing the number 7, and "Send" is marked with a black circle containing the number 8. Below the progress bar, the text "In this section you can attach useful documents to substantiate your report" is displayed. At the bottom of this section is a red button labeled "ADD". A large yellow arrow points from the number 6 in the text above to the "Attachments" step in the progress bar.

Oofferista Transforming Retail

Modulo Whistleblowing
powered by **KEISDATA**

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

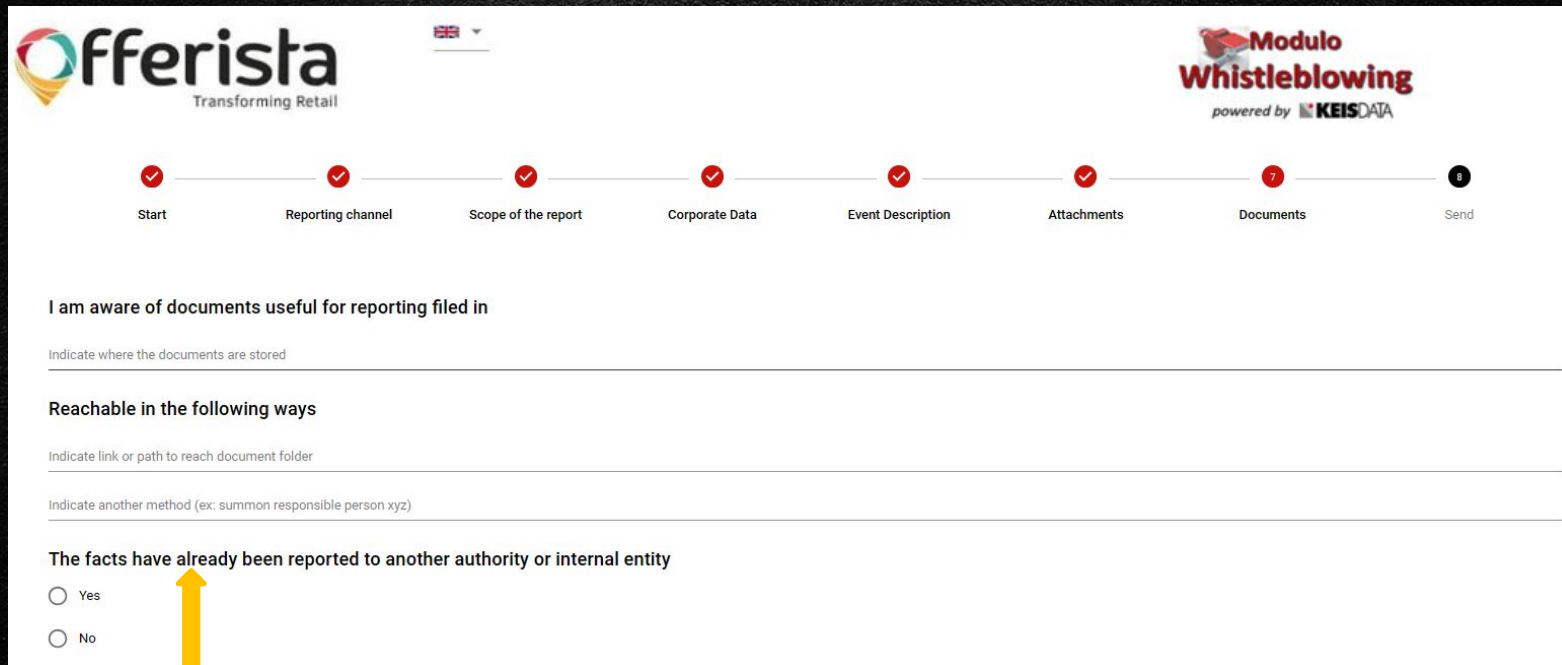
In this section you can attach useful documents to substantiate your report

ADD

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.



offerista Transforming Retail

UK

Modulo Whistleblowing
powered by KEISDATA

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

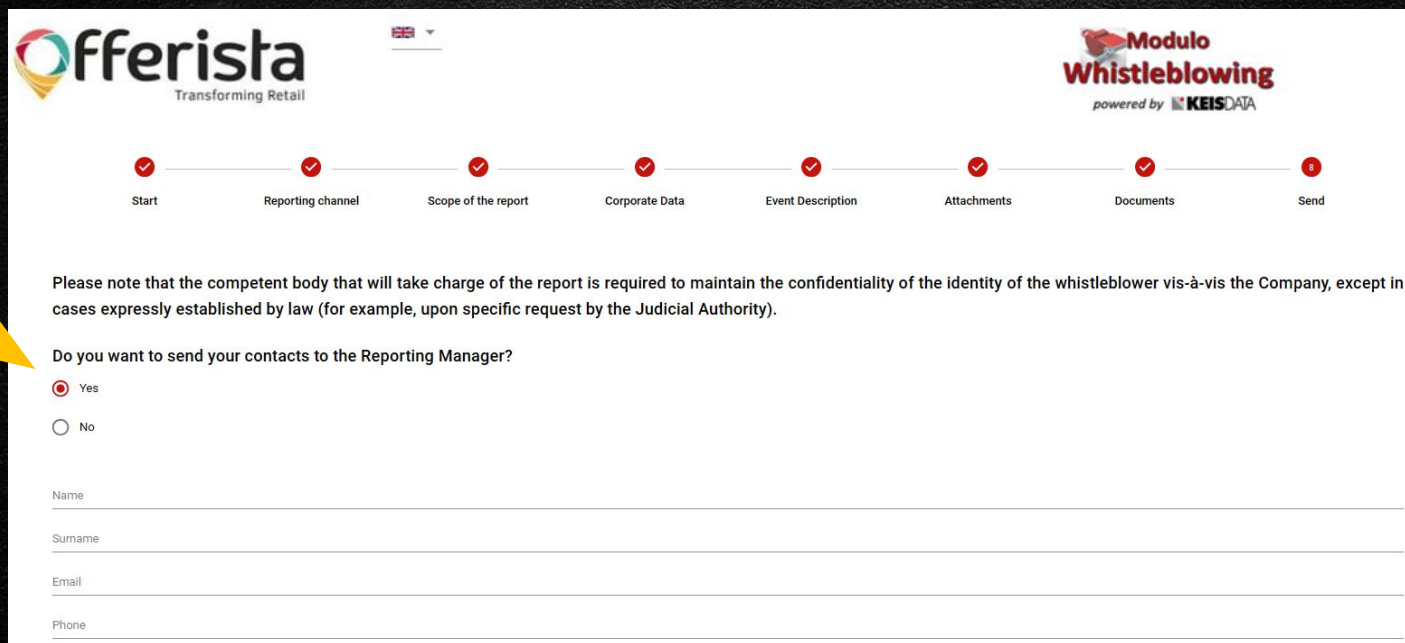
☐ No

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.



The screenshot shows the 'Send' screen of the 'offerista' whistleblowing module. At the top, the 'offerista' logo is on the left, and the 'Modulo Whistleblowing' logo, powered by 'KEIS DATA', is on the right. A progress bar with eight steps is displayed: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description', 'Attachments', 'Documents', and 'Send'. The first seven steps are marked with red checkmarks, and the 'Send' step is marked with a red circle containing the number '8'. Below the progress bar, a disclaimer states: '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)'. A question follows: 'Do you want to send your contacts to the Reporting Manager?'. There are two radio button options: 'Yes' (selected) and 'No'. Below the question are four input fields for '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 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.