



PROCEDURE FOR MANAGING REPORTS AND COMPLAINTS CONCERNING VIOLATIONS TO THE ETHICAL CODE OF THE GROUP

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OBJECT, INVOLVED SUBJECTS AND SCOPE

This Procedure regulates the methods for managing complaints and reports (hereinafter "Complaints") about the violation of the ethical-behavioral principles provided for by the Ethical Code of Ratti Group. Account is taken of complaints received from members of the Social Organs, staff (employees and non-employees) of all Group companies, and all those who, directly or indirectly, permanently or temporarily, establish relations with Ratti, or however, those who operate to pursue its objectives ("Complainants"). The Procedure is valid for all Group companies.

HOW TO MAKE A COMPLAINT

Complaints of the violation may be sent by letter or e-mail, signed or anonymous, to one of the following addresses:

- by ordinary mail to Ratti Group S.p.A. to the attention of the Group Ethical Committee, writing on the letter the words «**confidential document – do not open**»;
- by e-mail to: **Rattiwhistleblowing@legalmail.it**.

However, complainants are encouraged not to report anonymously, in order to facilitate any investigation activity. In any case, the Complaint must be substantiated and based on precise and concordant facts. In this perspective, Complaints should be as detailed as possible and offer the greatest number of elements, in order to allow the Group Ethical Committee to carry out the necessary verifications.

Complaint procedure

All complaints of violation received, regardless of whom receives them and of their source, must be sent to the attention of the Ethical Committee, including complaints about foreign controlled societies. The Ethical Committee will ensure that all complaints are:

- registered and kept;
- qualified (filing or activation of verification) with explanation of the reasons that lead to the decision;
- subject, if necessary, to the verification process with information of the interested parties.

In order to activate the necessary verification, the Group Ethical Committee may, at its discretion, use any function that it believes has the professionalism and / or knowledge to provide it with the necessary support.

It is up to the Group Ethical Committee to assess if it is necessary to previously inform the denounced and/or the complainant before proceeding with the investigation.

The Group Ethical Committee suspends or interrupts the investigation if it is found to be groundless and, if the bad faith of the complainant is established, has the right to start judicial proceedings against them.

The Group Ethical Committee, in compliance with the necessary confidentiality criteria, communicates the results of the verification and the possible measures proposed to remedy the irregularities found to the heads of the interested Function or Functions, to the Manager of Human Resources and to the Corporate Body that is responsible for taking those measures.

The Group Ethical Committee, at least twice a year, gives the Board of Directors information about

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reports

or opinion requested and, occasionally, to the other control bodies where applicable.

The Board of Statutory Auditors, in case of complaints concerning financial statements, accounting, internal controls and auditing, may request further information from the Group Ethics Committee.

PROTECTION OF THE COMPLAINANTS

In compliance with the best practices in the matter, Ratti Group does not tolerate any kind of retaliation against those who, in good faith, report an illegal activity or violation or provide the Ethical Committee and / or the Management with assistance in the investigation.

The Ethical Committee does not reveal the identity of the Complainants and does not tolerate initiatives that have the objective of identifying the Complainant

Ratti Group, moreover, ensures that the received reports are treated with confidentiality, in compliance with the norms.

INFORMATION TO EMPLOYEES AND THIRD PARTIES

In order to give efficacy to communication and training towards the employees, the Ethical Committee will activate the following process:

- sending the text of the procedure, in Italian and English, to all Managers of the Corporate Functions and to all Managers of the Group Companies, giving mandate to provide to its circulation in their structures;
- indication of the references where to address the complaints;
- insertion of the procedure on the website of the Group, in order to give external subjects the possibility to view its content too.