

FAQ

FAQ ON WHISTLEBLOWING REPORT MANAGEMENT



WHO CAN MAKE A REPORT?

Employees, self-employed workers, those with collaboration relationships, volunteers and apprentices, including those who are unpaid, who perform their work activities at Trenitalia S.p.A.; workers or collaborators who perform their work activities at establishments that provide goods or services or carry out projects in favour of third parties; self-employed professionals and consultants who perform their work activities at Trenitalia S.p.A.; the shareholders of Trenitalia S.p.A. and those people who hold offices in administration, management, control, supervision and representation. These subjects report information on breaches which they come to know of within the context of their work.

Reports may also be made:

- a) when the legal relationship has not yet begun, if the information on the breaches comes to light during the selection process or other pre-contractual stages;
- b) during the trial period;
- c) after the end of the legal relationship, if the information on the breaches came to light during the course of the relationship.

WHAT CAN BE REPORTED?

Information on breaches which concern facts of any nature, including omissions, which may include:

- i. Conduct in violation of the Code of Ethics, of the Trenitalia S.p.A. 231 Model, of the Anti-Corruption Policy and the Anti-Bribery & Corruption management system, of laws and regulations, of rulings from the Authorities, of company procedures and provisions, and in any case conduct liable to cause harm to Trenitalia S.p.A., even if only to its image or reputation, learned about within the course of the company's activities;
- ii. Administrative, accounting, civil or criminal offences;
- iii. Unlawful conduct pertaining to Italian Legislative Decree No. 231 of 8 June 2001;
- iv. Offences which fall within the scope of application of acts of the European Union and of the national provisions through which they are implemented;
- v. Acts or omissions which affect the financial interests of the European Union;
- vi. Acts or omissions relating to the internal market (for example: breaches related to competition and State aid);
- vii. Acts or conduct which defeats the object or the purpose of the provisions of European Union acts.

The report must contain information which can be used to verify the reported facts of which the Whistleblower has become aware; the person making the report must have well-founded reasons to believe the information to be true when making the report.

Reports must be made promptly following the discovery of the facts, in order to make it possible to verify them.



HOW CAN I MAKE A REPORT?

Trenitalia S.p.A. provides several channels for submitting reports:

- an IT platform: accessible from the Trenitalia S.p.A. website — www.trenitalia.com — or through the company intranet. This is considered the preferred channel, as it is best suited for guaranteeing the confidentiality of the whistleblower's identity and adequate information security measures from the start, through electronic means;
- ordinary mail: to the following address: Trenitalia S.p.A., Segreteria Tecnica Comitato Etico presso la Direzione Audit di Trenitalia S.p.A. - Piazza della Croce Rossa, 1 - 00161 Rome, Italy; or: Organismo di Vigilanza presso la Direzione Audit di Trenitalia S.p.A. - Piazza della Croce Rossa, 1 - 00161 Rome, Italy;
- email: to the email address: comitatoetico@trenitalia.it; or: Segnalazioni.231@trenitalia.it;
- telephone line/voice message system: this is currently being set up, and involves the recording and transcription of a conversation with the express consent of the Whistleblower;
- verbally: by means of a declaration made by the Whistleblower, at a special hearing, to the Ethics and Reporting Committee/Supervisory Body of Trenitalia S.p.A., recorded in the minutes and signed by the Whistleblower.

WHY SHOULD YOU MAKE A REPORT?

Reports made in good faith and in the interest of the common good can allow the company to promptly identify and rectify any unlawful conduct or improper actions which could damage the Group or third parties.



WHAT GUARANTEES CAN TRENITALIA S.P.A. OFFER TO WHISTLEBLOWERS?

In full accordance with the law, protection is guaranteed for the confidentiality of the whistleblower's identity from the time when the report is received. All direct and indirect forms of retaliatory or discriminatory actions as a result of the report are forbidden, including those of omission and those which are attempted or threatened, as well as those directed against third parties connected to the Whistleblower, such as facilitators, relatives, colleagues and legal entities which the Whistleblower may own or for which he/she may work, operating in a work context connected to the FS Italiane Group.

Whistleblowers shall be informed of the receipt of the report, and of the outcomes of any investigations made in its regard.





WHAT PROTECTION DOES TRENITALIA S.P.A. GUARANTEE FOR INVOLVED PERSONS (THE PERSONS NAMED IN THE REPORT)?

Trenitalia S.p.A. protects all the rights of Involved Persons, ensuring that all communications regarding their identity are made on a strict need-to-know basis in order to guarantee appropriate levels of confidentiality.

Involved Persons shall be informed of the existence and content of the report and shall receive a copy thereof, excluding any reference to the identity of the Whistle-blower, which may not in any case be revealed to the Involved Person, with the exception of the cases explicitly provided for in law.

The Involved Person has the right to be informed of the outcome of investigations, with the exception of the cases explicitly provided for by the company procedure in this regard.

WHAT DOES TRENITALIA S.P.A. DO ONCE IT RECEIVES A REPORT?

The relevant bodies within the company (the Ethics and Reporting Committee and the Supervisory Body) verify the contents of the report to ascertain the facts, to determine whether they are founded and enable the implementation of the necessary measures to prevent or penalise the improprieties or illicit actions identified.



CAN REPORTS BE SENT ANONYMOUSLY?

Yes.

However, if you make your identity known when you send a report, Trenitalia S.p.A. guarantees the full protection of your confidentiality pursuant to the law, and can inform you of the outcome of any investigations conducted thanks to your report.

HOW IS PROTECTION AGAINST MALICIOUS OR DEFAMATORY REPORTS ENSURED?



Malicious and defamatory reports are forbidden, and penalised in accordance with the law and through disciplinary action by the company.



HOW ARE PERSONAL DATA PROCESSED?

Personal data are processed in accordance with the applicable legislation on the matter. All information regarding the purposes and methods of processing is available online at the website www.trenitalia.com and on the company intranet.