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REV	Date	Modifications
00	20/02/2025	Initial issue
01	12/06/2025	Management of reports from outside the organisation

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	HANDLING OF ANONYMOUS REPORTS	

1.0 PURPOSE AND SCOPE

The purpose of this procedure is to regulate the way in which all internal and external stakeholders (see details in section 3.0) are to be notified of reports and/or complaints in relation to the performance of work and working conditions.

The management of reports is a tool made available to workers and other interested parties to report any unlawful acts, facts and events of an abusive, offensive or illegal nature, occurring in the workplace (or related to it) and in contrast with the procedures, modus operandi, Code of Ethics and policies implemented by Molino Nicoli S.p.a.

A comment or suggestion, on the other hand, is an indication provided by workers and other stakeholders to point out possible areas for improvement and/or appreciation.

This procedure also defines how reports are to be forwarded, analysed and handled by the relevant functions.

2.0 REFERENCES

Standard Rainforest - SMETA

M1.1_List of documents last updated

M1.2_Register Standards and laws last updated


3.0 LIABILITY

This document is addressed to the following parties:

- Direct and/or contract employees. Internal stakeholders.
- All those who are linked to the Company by a professional and/or business relationship suppliers, financiers, consultants, collaborators, customers, agents, partners in general.
- External consumers. External stakeholders

It is the Quality Assurance department's responsibility to verify the correct and regular application of the contents of this document and to intervene in the event of problems relating to fraud and/or situations that could compromise the safety of the product from a legal and/or health point of view.

It is the responsibility of the Whistleblowings and Complaints Management Committee and the Gender Equality Committee (hereinafter referred to as the Committee, since the members and the person in charge are the same) to take charge of, analyse, resolve and review any reports received from internal and external stakeholders, informing the person(s) concerned of the action taken, in direct agreement with the company management. This with specific reference to ethical, social, environmental or workplace health and safety issues.

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4.0 TYPOLOGY OF ALERTS

Complaints within the scope of this procedure concern ethical-social, health and safety and environmental aspects. As regards product-related complaints, please refer to PG26.

With regard to reports on human rights violations and on occupational health and safety and the environment, examples include:

1. Child labour (prohibition of);
2. Forced and compulsory labour (prohibition of);
3. Health and safety at work (guarantee of);
4. Freedom of association and the right to collective bargaining (guarantee of);
5. Discrimination (prohibition of);
6. Disciplinary procedures (compliance of);
7. Working hours (compliance of);
8. Remuneration (conformity of).
9. Harassment / acts of violence (prohibition of).

Complaints, grievances or any acts similar thereto of a purely commercial nature may not be reported under this procedure.

5.0 MANAGEMENT OF ALERTS

The process of handling alerts is described in the following points.


5.1 Forwarding the Report

All reports may be submitted to the Committee either anonymously or in signed form, at the discretion of the party concerned, by the following means:

- By e-mail to one of the members of the Committee, as indicated on M5.1;
- By requesting a personal discussion with one of the committee members (see M5.1).
- Posting in the dedicated boxes located near the stamping machines / notice boards in the various departments and offices.
- Send the report in a sealed envelope by ordinary mail to the address
MOLINO NICOLI S.p.a.
VIA ANTONIO LOCATELLI NO. 6
24060, COSTA DI MEZZATE (BG)
Make sure to mark the outside of the envelope "**NOTICE OF VIOLATION**".
- By filling in the relevant form at www.molinonicoli.it

An updated copy of the M5.1 is available from the dedicated cassettes.

Employees are made aware of the reporting mechanism by means of a sign on the notice board M5.2 'Communication of the whistle-blowing and complaints procedure to staff' and periodic in-house training meetings.

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For reports through the dedicated area of the website go to:

www.molinonicoli.it → Contatti → Vuoi fare una segnalazione? → Segnalazione etica → Fill in the appropriate form (anonymously)

the recipient will forward any reports received to the Committee with the utmost discretion and confidentiality with respect to reports sent by regular mail. While reports received via the website will be addressed directly to the Committee.

5.2 Preliminary verifications

All reports received, provided that they contain objective references, will be taken up by the Committee and analysed with a view to activating, where possible, remedial action on the individual case, or corrective action to avoid its recurrence, and then verifying the outcome.

The receipt of any reports is monitored by the Head of the Committee every 15 days.

Reports received must be considered by at least 2 members of the Committee within 10 working days of receipt. All those involved in the process of handling the report are bound by strict confidentiality. Violation of this clause may result in disciplinary sanctions.

Upon receipt of the report, the Committee, with the possible cooperation of the corporate functions concerned, initiates an investigation.

For substantiated cases, an official nonconformity is opened, as provided for in PG26 Management of nonconformities, complaints, corrective actions. Unsubstantiated cases are closed and the decision is communicated, depending on the type of sender and how the report was forwarded, to the person concerned or by notice on the notice board.

5.3 Report Management

The handling of the substantiated NC and its resolution will be communicated to the parties concerned by means of posting on the notice board, if received anonymously, or by communication directly to the reporter in written or verbal form. In the case of a report received via the website, the response will be published in the appropriate section

www.molinonicoli.it → Contatti → Hai fatto una segnalazione?


This is no later than 15 days from the date of receipt.

If the person concerned is not satisfied with the outcome of the corrective action taken, he/she may submit a new report in the manner chosen.

In the event that the Committee is unable to resolve an issue, and only when all options have been exhausted, the person or organisation may submit the complaint to the certification body that issued the Rainforest certificate or may contact Rainforest Alliance directly.

Reports that refer to suggestions and/or opinions applicable to the company's reality and concretely feasible, are assessed by the Committee during the Management Review and, on the basis of the assessments made, their possible implementation will be carried out.

It should be noted that any reports received concerning legal and health safety aspects of the product are handled in full by Quality, based on the provisions of PG26.

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6.0 GUARANTEES TO PROTECT THE REPORTER

Molino Nicoli S.p.a. guarantees:

- The right to anonymity of anyone wishing to report without making themselves recognisable.
- The handling of all incoming alerts regardless of whether or not there are indications of who received them.
- Equal treatment and non-discrimination.
- Feedback information on what has been decided and implemented with regard to the individual complaint and/or report, in a timely manner and in a way that can be identified on a case-by-case basis, so as to ensure that the outcomes of the actions taken are known.
- Checking for possible conflicts of interest in the resolution of a complaint.