

# whistleblowing@thyssenkrupp rothe erde Italy SpA

At **thyssenkrupp rothe erde Italy** integrity, compliance with the law and internal regulations are of highest priority. To ensure that these values are upheld and potential risks arising from violations are avoided or minimized, it is crucial that misconduct is identified, clarified, and remedied at an early stage. Every indication of a potential misconduct are treated seriously and lead to an investigation following an objective and transparent process without any bias. thyssenkrupp rothe erde Italy therefore makes available to whistleblowers in compliance and under protection of the Portuguese implementation law, an internal information system that enables whistleblowers to submit reports.

The Italian Legislative Decree No. 24/2023 implemented the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of EU laws.

The Decree, which came into force on March 30, 2023 for entities with at least 50 employees, requires companies to activate a reporting channel and to install investigation procedures that guarantee, among others, the confidentiality of the report and the protection of the whistleblower against disclosing its identity and any retaliation resulting from a report.

A detailed description of the thyssenkrupp rothe erde Italy's [Investigation Principles](#) and [Rights and Duties of a Whistleblower](#) can be found as attachment of this page.

## 1. Who can inform about a violation?

The whistleblower is the natural person who submits the report or makes a public disclosure of information on violations acquired in the context of his or her work. Reporting can be done through multiple channels by:

- staff with an employment relationship
- self-employed workers
- freelancers and consultants, suppliers, customers
- volunteers and trainees
- shareholders or owners of company shares persons with administrative, management, supervisory or representative functions
- any person working for or under the supervision and direction of contractors, subcontractors and suppliers.

## 2. What can be reported?

Violations of internal regulations and/or applicable laws, violations of human rights and environmental-related breaches of duty or risks as well as breaches of European law can be reported through a variety of channels. Even indications or suspicions of violations can be reported and will be treated seriously. Therefore, in this document “violations” will refer to both actual and potential violations.

### 3. Who is responsible for dealing with reports?

In line with the French implementations laws thyssenkrupp rothe erde Italy entrusted the central thyssenkrupp AG which has established Compliance Investigations Department (CO/L&C-INV) with its autonomous and specifically trained personnel as “System Manager” to support thyssenkrupp rothe erde Italy with the tasks of receiving reports and conducting investigations. The respective Compliance Investigation Officers are impartial, independent, are not bound by instructions with regard to investigations and sworn to secrecy. Incoming reports, that can also be submitted anonymously, are treated confidentially and whistleblowers are protected by all appropriate means against any disadvantages resulting from a report.

Whistleblowers may submit a report through various channels described below. The System Manager together with the tk Group Function Internal Auditing (“CO/AUD”) and Compliance Manager, (“CO/AUD”) the Compliance Manager and, if necessary, after consulting the company's Supervisory Body in the event of a violation of the provisions of Legislative Decree 231/01, will agree on adequate investigation procedures and propose adequate measures to thyssenkrupp rothe erde Italy, if necessary.

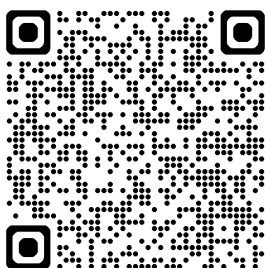
### 4. How can I submit a report?

An open communication culture is an essential component of well-functioning compliance. Employees must be able to address potential violations openly, anonymously and, above all, at an early stage.

For this purpose, thyssenkrupp rothe erde Italy makes a number of internal whistleblowing channels available which are set out below:

#### 4.1 thyssenkrupp Electronic Whistleblowing System (BKMS)

The Compliance Whistleblowing System of thyssenkrupp can directly be accessed under <https://www.bkms-system.net/thyssenkrupp-ita> or by scanning the QR code below:



(The link or QR code will take you to the Compliance Whistleblowing System in Italian. You can select another language on the landing page, e.g. English or German, to submit your report in the Compliance Whistleblowing System.)

In addition to the Compliance Whistleblowing System, violations regarding the International Framework Agreement (thyssenkrupp internal HR violations) can also be reported to representatives on the International Committee and the Labor Relations department at thyssenkrupp AG under <https://www.bkms-system.net/frameworkagreement>

## 4.2 Telephone Hotline

thyssenkrupp contact via the following telephone number selecting Italian language (automated telephone dialog):

Phone: 00 39 02 81480081

**Access PIN: 4541**

## 4.3 Contacts with thyssenkrupp Headquarters

thyssenkrupp Headquarters can be reached via the following contact details:

thyssenkrupp AG,  
Compliance, Department Investigations  
thyssenkrupp Allee 1,  
45143 Essen  
Germany

[whistleblowing@thyssenkrupp.com](mailto:whistleblowing@thyssenkrupp.com)

## 4.4 Contacts within thyssenkrupp rothe erde Italy

If you work for thyssenkrupp, you can also contact your compliance manager responsible for your company directly. A detailed list of contacts is available on the [intranet](#).

Please note: If a face-to-face meeting is requested, it will be organized within 7 days. If the report is submitted orally, with prior consent of the whistleblower, the report is documented in a secure, durable and accessible format, or by a transcript of the conversation. The whistleblower may be given the opportunity to verify, rectify and confirm the minutes of the meeting by signing them.

More information on the submission of reports to thyssenkrupp can be found here: [Submitting a report \(thyssenkrupp.com\)](#)

## 4.5 External Reporting Channels

We encourage whistleblowers to use our internal reporting channels. Whistleblowers also have the option to submit their report to external reporting channels. This external reporting channels can be:

**National Anti-Corruption Authority (Autorità Nazionale Anticorruzione - ANAC)**

c/o Palazzo Sciarra,

Via Minghetti, 10

00187 Roma

Website: <https://www.anticorruzione.it/-/whistleblowing>

## 5. Data Protection

While carrying out internal investigations, it will be ensured that the applicable data protection laws are complied with. Detailed information on the subject can be found here: [Data Protection Information](#)