

# SIAD Whistleblowing



---

Pursuant to applicable European provisions regarding the "*protection of persons who report breaches of national regulatory provisions*" (implementing 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 Union law and containing provisions regarding the protection of people who report violations of national regulatory provisions*), SIAD encourages Employees, Contractors, Suppliers, Trainees, Shareholders, Consultants, as well as anyone who provides services to companies in the SIAD Group (even if the legal relationship with the Company has not yet begun) to report any unlawful conduct that harms the integrity of the Company or the public interest, of which the reporter has become aware in the context of working with the Company (such reports are more commonly defined as "Whistleblowing").

## What can be reported - illegal conduct subject to reporting

The following can be reported:

- significant unlawful conduct and breaches of the Organization, Management and Control Model adopted by the Company and the Code of Ethics which is an integral part of it;
- offenses that fall within the scope of European or national legislation, relating to the following sectors: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems;

- actions or omissions that harm the financial interests of the European Union (for example, fraud, corruption and any other illegal activity related to European Union expenditure);
- actions or omissions relating to the internal market (for example: breaches relating to competition and state aid); actions or conduct that defeat the object or purpose of the provisions contained in European Union documents.

Disputes, claims or demands related to personal interests, defense and national security, and breaches already regulated by the directives and regulations of the European Union which already guarantee specific reporting procedures in some special sectors (e.g. financial services, prevention of money laundering and terrorist financing, transport safety, environmental protection) are excluded from the reporting.

## Internal Reporting channels made available to the Reporter

In order to encourage the reporting of any breaches, SIAD has established a series of internal channels available through the “**Comunica Whistleblowing**” IT platform accessible via the link on this same page of the website.

The Platform can be used to:

- *submit written reports* by creating a password and receiving a “Report Number” with which to monitor the status of the report;
- *submit verbal reports* using the specific option made available (with automatic voice modification to make it unrecognizable);
- *submit reports by requesting a face-to-face meeting* with the Reporting Manager.

## Whistleblowing Officer

Reports will be received and handled by the Whistleblowing Officer, who is specifically authorized to process the relevant data pursuant to articles 29 and 32 of the GDPR and art. 2(14) of the Privacy Code, and is specially trained on the subject of Whistleblowing and on the protection of personal data.

The Whistleblowing Officer is tasked with receiving the Report and carrying out a preliminary assessment to determine whether or not it meets the fundamental requirements and can be considered suitable for processing and any subsequent analysis and investigation.

Within 7 days of receipt, an acknowledgment of receipt of the report will be given and within 3 months of this notice, feedback will be provided on how the report has been or will be followed-up.

# General Principles and Protections

The Company undertakes to protect the confidentiality of the identity of the Reporter, the Reported Party, the facilitators and any other person mentioned in the report, as well as the **confidentiality** of the information contained in the report itself and the documentation attached to it.

The reports may only be used for the necessary follow-up and processing of the same.

**No personal or professional retaliation arising from the reporting is permitted.**

## Personal data processing

All the personal data are processed in compliance with the rules regarding the protection of personal data, with full respect for fundamental rights and freedoms, with particular regard to the confidentiality of the identity of the subjects involved and the security of the processing.

The platform is structured in such a way as to guarantee compliance with the principles of personal data protection and maximum confidentiality, so that only the Whistleblowing Officer and the people involved in handling the Report can access sensitive data and relevant information.

*For further information, please refer to the **Privacy Notice***

## External reporting channels and public disclosure

*(if applicable, as per the specific procedures of the companies, to which reference should be made)*

If the Report concerns breaches of European Union regulations and the Reporter has already made a report through an internal channel which has not been followed up, or he/she has reasonable grounds to fear that it may result in retaliation or an evident or imminent danger to the public interest, or, if one of the conditions envisaged by the specific Procedure exists, an external report may be made through the channels made available by ANAC (<https://www.anticorruzione.it/-/whistleblowing>), or by so-called public dissemination (through the press or electronic means or by means of dissemination that can reach a large number of people).

SEND YOUR REPORT

 Print

---

SIAD Whistleblowing Manual for employees ENGLISH ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-ENGLISH.pdf/014c08bc-1da1-a6f4-c4a0-94b267f34c35](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-ENGLISH.pdf/014c08bc-1da1-a6f4-c4a0-94b267f34c35))

SIAD Whistleblowing Manual for employees ARABIC ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-ARABIC.pdf/d74bdee4-6903-3da2-8e73-e13960edbc4d](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-ARABIC.pdf/d74bdee4-6903-3da2-8e73-e13960edbc4d))

SIAD Whistleblowing Manual for employees BOSNIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-BOSNIAN.pdf/a29f5aaa-6fdf-5ff1-fe4c-6404a98e8431](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-BOSNIAN.pdf/a29f5aaa-6fdf-5ff1-fe4c-6404a98e8431))

SIAD Whistleblowing Manual for employees BULGARIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-BULGARIAN.pdf/9b016a30-430e-c69c-393d-fd7c559ab86e](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-BULGARIAN.pdf/9b016a30-430e-c69c-393d-fd7c559ab86e))

SIAD Whistleblowing Manual for employees CHINESE ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-CHINESE.pdf/96251420-53b4-4e9e-f7c3-16f8ce31bcb1](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-CHINESE.pdf/96251420-53b4-4e9e-f7c3-16f8ce31bcb1))

SIAD Whistleblowing Manual for employees CROATIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-CROATIAN+%281%29.pdf/25f023be-6e9e-0b3f-3890-516d645dd73b](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-CROATIAN+%281%29.pdf/25f023be-6e9e-0b3f-3890-516d645dd73b))

SIAD Whistleblowing Manual for employees CZECH ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-CZECH.pdf/026365d2-36c6-e5fc-dd7c-0c145f19b47a](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-CZECH.pdf/026365d2-36c6-e5fc-dd7c-0c145f19b47a))

SIAD Whistleblowing Manual for employees DUTCH ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-DUTCH.pdf/5b1b26c7-ca2c-d763-6c65-07d4598ea4c0](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-DUTCH.pdf/5b1b26c7-ca2c-d763-6c65-07d4598ea4c0))

SIAD Whistleblowing Manual for employees FRENCH ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-FRENCH.pdf/89a408f8-c18a-fd5c-ce04-d9966a99e692](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-FRENCH.pdf/89a408f8-c18a-fd5c-ce04-d9966a99e692))

SIAD Whistleblowing Manual for employees GERMAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-GERMAN.pdf/6eeedeaf-161c-930f-9c91-7c17b43d71e4](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-GERMAN.pdf/6eeedeaf-161c-930f-9c91-7c17b43d71e4))

SIAD Whistleblowing Manual for employees HINDI ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-HINDI.pdf/e28fef0c-915a-46dd-f38a-3d38131d8578](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-HINDI.pdf/e28fef0c-915a-46dd-f38a-3d38131d8578))

SIAD Whistleblowing Manual for employees HUNGARIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-HUNGARIAN.pdf/d5442802-49fa-0f99-f419-1035e12b4f2b](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-HUNGARIAN.pdf/d5442802-49fa-0f99-f419-1035e12b4f2b))

SIAD Whistleblowing Manual for employees POLISH ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-POLISH.pdf/0815c3ac-5055-a010-d6e1-aa8ed76caf50](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-POLISH.pdf/0815c3ac-5055-a010-d6e1-aa8ed76caf50))

SIAD Whistleblowing Manual for employees PORTUGUESE ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-PORTUGUESE.pdf/e9ab041b-c312-0c3c-4c5b-4e4a3167ca9d](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-PORTUGUESE.pdf/e9ab041b-c312-0c3c-4c5b-4e4a3167ca9d))

SIAD Whistleblowing Manual for employees ROMANIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-ROMANIAN.pdf/9c015248-1187-0130-30b2-50e0db6e04b5](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-ROMANIAN.pdf/9c015248-1187-0130-30b2-50e0db6e04b5))

SIAD Whistleblowing Manual for employees RUSSIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-RUSSIAN.pdf/a3c12aab-5306-5409-e553-14e882127ece](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-RUSSIAN.pdf/a3c12aab-5306-5409-e553-14e882127ece))

SIAD Whistleblowing Manual for employees SERBIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-SERBIAN+%281%29.pdf/cb23fba1-8e18-112c-a089-b6dca32f6b9b](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-SERBIAN+%281%29.pdf/cb23fba1-8e18-112c-a089-b6dca32f6b9b))

SIAD Whistleblowing Manual for employees SLOVAK ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-SLOVAK.pdf/3defc172-1276-9031-3946-b500cf7b2363](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-SLOVAK.pdf/3defc172-1276-9031-3946-b500cf7b2363))

SIAD Whistleblowing Manual for employees SLOVENIAN ([https://www.thesiadgroup.com/documents/104637/801177/Manual\\_Whistleblowing-SLOVENIAN+%281%29.pdf/8389f5c2-6f6d-b1e2-02b3-8cc80664320c](https://www.thesiadgroup.com/documents/104637/801177/Manual_Whistleblowing-SLOVENIAN+%281%29.pdf/8389f5c2-6f6d-b1e2-02b3-8cc80664320c))

0

RESOURCES: [Video Gallery \(/en/video-gallery-en\)](/en/video-gallery-en)

NEWS: [All News \(/en/news\)](/en/news)

CALENDAR: [All Events \(/en/calendar-and-events\)](/en/calendar-and-events)

Copyright © Gruppo SIAD 2020. All rights reserved.

SOCIETA' ITALIANA ACETILENE E DERIVATI S.I.A.D. S.p.A.

I-24126 Bergamo - Via S. Bernardino, 92

Partita IVA e Cod. Fiscale 00209070168 - Indirizzo di Posta Certificata: siad@pec.it

Capitale Sociale - Share Capital € 25.000.000 i.v. - paid up

P.IVA, C.F., Reg. Impr. Bg - VAT and Fiscal Nr.: (IT) 00209070168

R.E.A. BG-15532 - Export: BG 000472

[Legal Notice \(/en/legal-notice\)](/en/legal-notice)

[Privacy \(/en/privacy\)](/en/privacy)

[Cookie Policy \(/en/cookie-policy\)](/en/cookie-policy)

[Site Map \(/en/site-map\)](/en/site-map)



<https://www.facebook.com/Gruppo.SIAD/?fref=ts>



<https://www.youtube.com/user/GruppoSIAD>



<https://www.linkedin.com/company/the-siad-group/about/>

siad-group/about/