

Group policy for the
management of reports
of violations
(Whistleblowing)

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1	15 December 2015	<i>Issue</i>
2	28 November 2016	<i>Update following the acquisition of ex Interbanca Group</i>
3	17 October 2017	<i>Update following the merger of Interbanca</i>
4	19 January 2018	<i>Update following the regulatory changes introduced: in art. 6 of (It.) Legislative Decree no. 231 of 8 June 2001, in art. 48 of (It.) Legislative Decree no. 231 of 21 November 2007, in art. 4-undecies of (It.) Legislative Decree no. 58 of 24 February 1998</i>
5	14 January 2021	<i>34th update of 22 September 2020 of Circular no. 285 of 17 December 2013, Title IV, Chapter 3.</i>

1 Document objectives and management

1.1 Document objectives

Banca IFIS (hereinafter also the Parent Company), in accordance with the regulatory provisions and *best practices*, defines the internal system aimed at allowing the reporting by its own personnel¹ and that of the Subsidiaries (hereinafter Subsidiaries)², of facts or deeds that may constitute a violation of the rules governing the activity carried out by the Parent Company and by the Subsidiaries (hereinafter also the Group), while guaranteeing the confidentiality of the personal data of the reporting party and of the presumed offender, also for the purpose of protecting the whistle-blower against retaliation and discrimination.

The purpose of the present document is to describe the system put in place by the Group for reporting violations, in particular:

- the formalities and channels of communication that reporting parties can use;
- the procedure that begins the moment in which a suspected violation is reported, with an indication of the various stages of the process, the parties involved and their roles and responsibility;
- the means by which receipt of the report is provided to the reporting party, where possible;
- the ways in which the reporting and reported parties must be updated on any developments;
- the obligation of the reporting party to declare if they have a private interest in the violation report made;
- the means of communication to the Corporate Bodies to which the head of the internal reporting system is required to provide information in the event of irregularities.

This Policy is also part of the organisational tools provided for by the Organisation, management and control model of Banca IFIS pursuant to (It.) Legislative Decree 231/01.

1.2 Recipients of the document

This document applies to, and has been distributed to all Group companies, as well as to all those who work with these companies, even under agreements other than employment contracts which involve them being included in the company organisation.

1.3 Document management

This policy, upon the Chief Executive Officer's request, has been approved by the Parent Company's Board of Directors and has been acknowledged by the Subsidiaries' Boards of Directors and circulated to all Group personnel.

Upon indications from the Parent Company's Internal Audit Office, as well as its Organisational Department and Compliance Office, the Chief Executive Officer will inform the Board of Directors of any need to amend this policy following changes in the legal and organisational context.

Responsibility for the different stages of the management process of this document is allocated as follows:

Parent Company					Subsidiaries
Drafting	Validation	Approval	Distribution	Archiving	Implementation
<u>Under the responsibility of:</u> Organisation <u>Operational Support:</u> Internal Audit and Compliance <u>Verification</u> General Manager	The Chief Executive Officer	Board of Directors	Organisational Office	Organisational Office	Board of Directors

¹ Pursuant to art. 1, paragraph 2, lett. h-novies) of (It.) Consolidated Banking Law, "personnel" means: "employees and those who in any case operate on the basis of relationships that result in their inclusion in the company's organisation, even in a form other than an employment relationship".

² For the purposes of these provisions, "Subsidiaries" shall mean the subsidiaries of Banca IFIS belonging to Banca IFIS banking group (as resulting at any given time from the Register of banking groups available on the Bank of Italy website) and the company IFIS Rental Services

This Policy was shared with the Compliance Office which assessed its compliance with the regulations of reference.

1.4 Adopted definitions

Banca IFIS Group (or Group). For the purposes of these provisions, the Banca IFIS Group is made up of Banca IFIS (Parent Company), by the other companies belonging to Banca IFIS Group (Subsidiaries).

Internal system for reporting violations. System aimed at allowing personnel to report facts or deeds that may constitute a violation of the rules governing the activity carried out by Banca IFIS Group.

Violation. Any action or omission which, in violation of the rules governing the activity carried out, is committed by a person belonging to the company's organisation and causes or can cause damage and/or harm to the companies of Banca IFIS Group.

Report of violation. Notification by the reporting party detailing the violation committed.

Personnel. The members of the governing, management and control Bodies, employees and those who in any case operate on the basis of relationships that result in their inclusion in the company organisation of Banca IFIS Group, even in a form other than an employment relationship. The following subjects therefore fall within the scope of this document:

- individuals with governing, management and control roles;
- personnel employed under an employment contract (e.g. permanent, temporary and apprenticeship contracts);
- personnel hired in a quasi-subordinate manner (contracts without subordination constraints such as, for example, project work and coordinated and continuous collaborations);
- freelancers regularly enrolled in a register who lend their work predominantly and continuously in favour of the Parent Company and/or its Subsidiaries.

2 Powers in the “process for the management of violation reporting”

Banca IFIS, in its capacity as Parent Company, defines the internal system aimed at allowing the personnel of the Parent Company and the Subsidiaries to report facts or deeds that may constitute a violation of the rules governing the activities carried out by the companies of Banca IFIS Group. The Parent Company, therefore, is responsible for training aimed at spreading the culture of legality; to this end it explains the internal reporting procedure to its personnel in a clear, precise and complete manner.

2.1 Board of Directors

The Board of Directors of Banca IFIS:

1. appoints the person in charge of the internal whistleblowing system. In application of this provision, the Board of Directors has identified the Head of Internal Audit of the Parent Company as responsible for the internal reporting system of Banca IFIS and of the Subsidiaries;
2. approves the internal system for reporting violations. It approves the reporting management process (receipt, investigation and reporting) set out and governed by this Policy;
3. it approves the annual report produced by the Parent Company's Head of Internal Audit on the correct functioning of this reporting management process which contains aggregate information on the outcome of activities carried out following reports received.

2.2 CEO

The CEO of Banca IFIS:

1. defines and takes care of the implementation of the violation reporting management process. In this area:
 - a. he/she ensures that the Group correctly complies with the applicable regulatory requirements;
 - b. he/she ensures the attribution of the related responsibilities to subjects with an adequate organisational position and meeting specific professional requirements³;
3. he/she puts in place initiatives and actions that guarantee the continuous completeness, suitability, functionality and reliability of the whistleblowing process;
4. he/she puts in place the initiatives and interventions necessary to continuously guarantee the completeness, adequacy, functionality and reliability of the violation reporting management process;
5. he/she ensures that corrective action is taken, or adjustments are made wherever flaws or anomalies are identified from a whistleblowing report.

2.3 Board of Statutory Auditors

The Board of Statutory Auditors of Banca IFIS monitors, also on the basis of the contents of the annual report of the Head of Internal Audit and any additional information that it deems appropriate to acquire from time to time, on the completeness, adequacy, functionality and reliability of the violation reporting process.

2.4 Head of Internal Audit

As head of the internal reporting system, the Head of Internal Audit of Banca IFIS:

1. ensures that the different phases of the process in question are carried out correctly;
2. refers the information reported, where relevant, directly and without hesitation to the applicable Management Bodies, ensuring that the identity of the parties involved remains confidential as per the provisions of this Policy;

³ Therefore, with an adequate degree of independent judgment and in possession of experience and knowledge suitable for the tasks to be performed.

3. draws up, on the basis of the information collected, an annual report on the correct functioning of the internal process, containing aggregate information on the results of the activity carried out following the reports received, which is approved by the Board of Directors and made available to the staff;
4. keeps a specific register of reports.

The Head of Internal Audit analyses the reports received. To carry out in-depth activities on the contents of the report, he/she may:

- use the services of the personnel of the organisational unit he/she oversees;
- involve the personnel of other organisational units;
- use support from third parties wherever strictly necessary or considered opportune based on the matter reported.

The head of the internal reporting systems as well as any other person involved in the procedure are obliged to guarantee the confidentiality of the information received, also with regard to the identity of the whistle-blower who, in any case, must be suitably protected from retaliation, connected - directly or indirectly - to reporting, as well as from discriminatory or otherwise unfair actions.

The Head of Internal Audit informs the Supervisory Body⁴ of the Parent Company and, in the case of a report concerning a Subsidiary, the Supervisory Body of the Subsidiary, where present, of the reports made where such reports are addressed to the Supervisory Body or in any case pertain to facts or deeds that may result in the liability of the Parent Company and/or of the Subsidiaries pursuant to (It.) Legislative Decree 231/01.

3 The system of reporting violations

In order to encourage the use of internal reporting systems and to promote the dissemination of a culture of legality, Banca IFIS explains to its personnel the internal reporting procedure adopted in a clear, precise and complete manner, indicating the safeguards in place to guarantee the confidentiality of the personal data of the whistle-blower and of the alleged offender, with the express warning that the European and national provisions on the protection of personal data that regulate access to personal data do not apply with regard to the identity of the whistle-blower, which can only be disclosed with their consent or when such knowledge is essential for the defence of the reported person.

3.1 Persons who can activate the violation reporting system

All personnel of Banca IFIS Group are authorised to make reports.

It being understood that the employee files any violation report freely and willingly, the Parent Company and its Subsidiaries will:

- ensure that the reporting party will not be subjected to any disciplinary action, except in cases of wilful misconduct or gross negligence, even where the violation report proves to be unfounded;
- adopt all the measures necessary to protect the employee's physical and emotional security, ensuring the reporting party receives adequate protection against any form of retaliation, penalisation, discrimination, and/or threats;
- implement all the measures necessary to ensure that the reporting party's identity remains confidential, including to the reported party. The identity of the reporting party may be revealed only with their consent. This obligation of confidentiality does not apply where this information is essential for any resulting investigations or where legal action is taken as a result of the report;
- guarantee, in accordance with the applicable regulations, special treatment for any reporting party also involved in the violation reported.

In general, the alleged offender is protected from negative repercussions deriving from the report in the event that no elements emerge from the reporting procedure that justify the adoption of measures against him/her. In case of adoption of measures against the person responsible for the violation, he/she must be protected from any negative effects other than those envisaged by the measures adopted. In this regard, sanctions are

⁴ Established pursuant to (It.) Legislative Decree no. 231/2001

envisaged for those who violate the measures for the protection of the whistle-blower, as well as for those who make reports with wilful misconduct or gross negligence that turn out to be unfounded.

3.2 Subject of reports of violations

Violation reports may refer to any action or omission, which does not comply with regulations governing the activity performed, carried out by a member of the Group's organisation which causes, or may cause, damage and/or detriment to the Parent Company and/or the Subsidiaries and for which the reporting party wishes to remain anonymous, as per this Policy.

Examples of violation reports include, but are not limited to, committed or attempted actions or omissions linked to acts or events that:

- break criminal law;
- are likely to cause financial damage to Banca IFIS Group;
- are likely to harm the health or safety of personnel, clients or damage to the environment;
- violate laws and regulations, codes of conduct and other corporate provisions that are punishable through disciplinary action. These include:
 - reports of potential or actual violations⁵ of the provisions dictated in order to prevent money laundering and terrorist financing⁶;
 - reports of violations of the rules on financial intermediation⁷;
 - detailed reports of unlawful conduct, relevant pursuant to (It.) Legislative Decree 231/01 or of violations of the organisation and management model of the entity, of which they have become aware due to the functions performed.

To make the report, it is not necessary for the whistle-blower to have evidence of the violation, however he/she must have sufficiently detailed information to make it reasonable to send the report.

The elements that must be included in the reports are:

- the data of the whistle-blower, indicating the contact channels for the subsequent interviews;
- the substantiated and verifiable facts known directly by the whistle-blower and the information and data necessary to unequivocally identify the offenders;
- any private interest the reporting party may have connected to the violation report made;
- any declaration of shared responsibility by the reporting party;
- any evidence (with attachments if available) necessary for investigation into the suspected violation⁷

Elements that must not be included in the report:

- reported facts of which the reporting party has no direct knowledge;
- personal details regarding the reporting party's job and/or relationship with supervisors/managers and colleagues;
- comments on any organisational shortcomings.

Reports made anonymously are not covered by this document and are not granted the protection set out by the regulations, except for reports regarding potential or actual violations of the provisions set out for the prevention of money laundering and the financing of terrorism for which anonymous reports are expressly allowed.

⁵ Ref. Article 57 ter, paragraph 39 letter b) Fifth Directive, guaranteeing persons exposed to threats, hostile acts or adverse or discriminatory acts in the workplace, for having reported a suspected case of money laundering or terrorist financing, the right to lodge a complaint in safe conditions with the respective competent Authorities.

⁶ The Italian legislator, in implementing the obligations imposed by the Fourth Anti-Money Laundering Directive, introduces with (It.) Legislative Decree of 25 May 2017, no. 90 in art. 48 of the anti-money laundering decree an ad hoc discipline on whistleblowing, establishing protection guarantees for the whistle-blower and providing for a specific communication channel.

⁷ Art. 4-undecies of (It.) Legislative Decree no. 58 of 24 February 1998 ((It.) Consolidated Law on Finance).

3.3 Structure of the process

The whistleblowing management process can be broken down as follows:

- reporting violations;
- analysis of reports made;
- reporting.

3.4 Reporting of violations

3.4.1 Report

The process is initiated when a member of Group personnel reports non-compliant acts or events that may be considered as a violation.

This violation report is sent using specific, autonomous and independent information channels that the Group has put in place. The internal reporting systems provide for alternative channels available to the whistle-blower in order to ensure that the person in charge of receiving, examining and evaluating the report is not hierarchically or functionally subordinate to any person reported, is not the alleged offender and does not have a potential interest related to the report such as to compromise his/her impartiality and independence of judgment.

The procedures relating to internal reporting systems are formalised and accessible to all personnel. These channels have been designed to guarantee the confidentiality of the reporting and reported parties at all times.

Group personnel may choose any of the following methods to report suspected violations:

1. e-mail service (assistenzaviolazione@bancaifis.it) dedicated to receiving reports of violations. This e-mail address is accessed only by the Head of Internal Audit of Banca IFIS;
2. postal service (or internal mail). Reports must be sent in a sealed envelope containing the wording "STRICTLY CONFIDENTIAL" and must be addressed to the Head of Internal Audit of Banca IFIS;
3. specific application for *whistleblowing*, accessible both from the company portal (Ifis4You) and from the institutional website (www.bancaifis.it). The management of this application is reserved to the Head of Internal Audit of Banca IFIS;
4. delivery in person by the reporting party to the Head of Internal Audit of Banca IFIS;
5. immediate report in writing by the collaborator to his/her superior or directly by the reporting person to the Supervisory Body, as required by the Code of Ethics⁸.

If a reporting party identifies a situation that is in any way incompatible with the reporting process described above, they may send the violation report directly to the President of the Parent Company's Board of Statutory Auditors.

In order to guarantee confidentiality of the reporting and reported parties, only a selected few within the IT system may manage the specific e-mail boxes and software. In addition, the reporting process may provide that the information on the identity of the whistle-blower is treated anonymously and may also provide that, when requested by the whistle-blower, the information that forms the subject of the report is brought to the attention of the corporate bodies, ensuring the anonymity of the person making the report.

The reporting party attaches the documentation he/she deems useful for reporting purposes⁹. The violation report must contain all the elements stated in paragraph 3.2. When reporting a violation, the reporting party must also declare any private interest he/she may have connected to this violation report and hence the existence of a possible conflict of interest.

This obligation of confidentiality does not apply where such information is essential for any resulting investigations or where legal action is taken following the violation report made. The confidentiality obligations do not apply when the information requested is necessary for investigations or in the presence of proceedings initiated by the judicial authority following the report.

⁸ Cf. "Code of Ethics", par. 7.2

⁹ It is not considered appropriate to limit the possibility of reporting to documented cases, considering that the presence of supporting documentation is an element related to the assessment of the report rather than to its admissibility.

If the whistle-blower is not jointly responsible for the violation, in addition to confidentiality, the Group guarantees protection from retaliation, sanctions, dismissal, direct or indirect discriminatory measures, having an effect on the working conditions for reasons directly or indirectly connected to the report. In managing whistleblowing reports, the confidentiality and privacy of the reported party is also ensured: the identity of this party is only revealed where strictly necessary and where it assists investigations and any ensuing evaluations.

In the management of the report, the confidentiality and protection of the personal data of the reported subject is also ensured: his/her identity is disclosed only in case of actual need and if it is essential for carrying out the appropriate in-depth examinations, carrying out investigations and any assessments. Furthermore, the confidentiality of any information received through this whistleblowing system is also guaranteed. Should any violation report be made anonymously, the Group is unable to safeguard the reporting party.

OUTPUT: Reporting - *Group personnel*

Role	Stakeholders involved
Responsibility	Group personnel
Operating Support	-
Consulted	-
Informed	Head of Internal Audit of Banca IFIS

3.4.2 Analysis of the reports

3.4.2.1 Receipt and initial analysis of reports made

The Head of Internal Audit constantly checks the various channels that may be used for reporting a violation:

- e-mail address specifically dedicated to receiving reports of violations;
- post (external/internal);
- special application for reporting¹⁰.

The Head of Internal Audit carries out a *screening* of the reports received (examination of formal admissibility) and, with the methods governed by this Policy, takes into consideration those that are:

- received from personnel (in compliance with the provisions of paragraph "3.1 Persons who can activate the violation reporting system");
- in line with the contents provided for in paragraph "3.2 Subject of the reports of violations".

The Head of Internal Audit will then assess the admissibility of the violation report and, where they consider it appropriate, will prepare a document detailing the report, omitting any points that may lead to identification of the reporting party. This allows other offices to see the information and to assist in assessing the report and identifying action to be taken in order to eliminate connected risk factors.

Where the report refers to the Supervisory Body, the Head of Internal Audit will also inform the Parent Company's Supervisory Body and, if it refers to a Subsidiary, the Subsidiary's Supervisory Body, where present.

For each report received, the Head of Internal Audit, within 15 working days, informs the reporting subject of¹¹ the receipt of the report, using the channel indicated by him/her; this communication justifies the possible inadmissibility of the report.

¹⁰ The application guarantees the encryption of data and of related attached documents.

¹¹ With the exception of reports transmitted anonymously through a channel other than the dedicated application

OUTPUT: Preliminary analysis of the report - *Internal Audit*

Role	Stakeholders involved
Responsibility	Head of Internal Audit of Banca IFIS
Operating Support	-
Consulted	-
Informed	Group personnel

3.4.2.2 Investigation into the violation report

The Head of Internal Audit, in coordination with the Supervisory Body for the reports addressed thereto or which in any case relate to facts of deeds that may involve responsibilities pursuant to (It.) Legislative Decree 231/01, having assessed the admissibility of the report, analyses its content in detail with reference to:

- the organisational area in which the suspected violation took place;
- the identity of the people involved in, or connected to, this suspected violation;
- the nature of the violation.

The Head of Internal Audit will take the actions they consider necessary in order to ascertain the facts, with particular reference to:

- standards of impartiality, confidentiality, the employee's dignity and personal data protection;
- employment laws, as well as the contractual regulations of the sector.

To carry out the activities of in-depth analysis of the report's contents, as already indicated, the Head of Internal Audit may use personnel belonging to the organisational unit that he/she supervises, may involve personnel from other structures or use the support of third parties, if it is strictly necessary or appropriate in light of the particular subject matter of the report received. The persons who receive, examine and evaluate the reports, the head of the internal reporting systems and any other person involved in the procedure are obliged to guarantee the confidentiality of the information received, also with regard to the identity of the whistle-blower who, in any case, must be appropriately protected from retaliation, discriminatory or otherwise unfair conduct resulting from the report.

Once the in-depth analysis is completed, the Head of Internal Audit formalises his/her assessments and sends them to the Chief Executive Officer and to the General Manager¹² as well as, where relevant, to the Supervisory Body, without prejudice to any situations of potential incompatibility. In the latter case, he/she reports directly to the Chairman of the Parent Company's Board of Statutory Auditors. The recipient will then take the required decisions about the acts or events reported, involving, if necessary, the Human Resources Department to define any disciplinary measures for the reported party and to inform the latter of the violation report made against them and the consequent outcome of the investigation. In case of adoption of measures against the person responsible for the violation, he/she must be protected from any negative effects other than those envisaged by the measures adopted. The Head of Internal Audit does not take any decisions, as these fall under the responsibility of the organisational offices involved and the applicable corporate bodies.

For each report received, the Head of Internal Audit also informs the person making the report and the person reported on the developments of the procedure and the conclusion of the assessments within his/her competence.¹³

Communication to the reported subject is made in cases where:

- it is deemed opportune to involve this party in the investigation;
- a disciplinary measure is intended to be taken against him/her.

¹² The assessments made on the reports concerning the Subsidiaries are also transmitted to the body with the management function of the latter.

¹³ With the exception of reports transmitted anonymously through a channel other than the dedicated application

OUTPUT: Preliminary investigation of the report - *Head of Internal Audit*

Role	Stakeholders involved
Responsibility	Head of Internal Audit of Banca IFIS
Operating Support	-
Consulted	-
Informed	- Chief Executive Officer and General Manager of Banca IFIS.

Role	Stakeholders involved
	<ul style="list-style-type: none"> - Body with management function of the Subsidiary with reference to the reports concerning the Subsidiary. - Where necessary, the Parent Company's Supervisory Body and the Subsidiary's Supervisory Body, where present. - The President of the Parent Company's Board of Statutory Auditors, in cases of potential incompatibility (in reference to the cases specified above). - The reported party.

3.4.2.3 Filing the documentation

The Head of Internal Audit will file the documentation produced in such a way as to ensure confidentiality. Specifically,

- a) paper documentation:
 - r is filed away in a safe place that is not accessible to third parties;
 - r if it is forwarded to third parties, the forwarding is confidential, the recipients are recorded, and confirmation of receipt is preferable.
- b) electronic documentation is filed in network folders with limited and controlled access. The reports managed within the specific IT application are also subject to encryption of all data (including any attachments)

3.4.2.4 Deadline for cancellation of the report

The deadline for the cancellation of the report, therefore of the documentation and related archived data, is set at 5 years.

OUTPUT: There are no outputs

Role	Stakeholders involved
Responsibility	Head of Internal Audit of Banca IFIS
Operating Support	-
Consulted	-
Informed	-

3.4.3 *Reporting*

In order to ensure an adequate degree of knowledge of the monitoring and the governability of the phenomena on the subject, *reporting* information flows are provided:

- towards the Corporate Bodies, without delay and immediately, so that the latter can have full knowledge of the violations reported by personnel and contribute to the identification of corrective measures;
- towards all personnel, to raise the degree of sensitivity of each on the subject and promote the awareness of being able to provide a valid individual contribution to compliance with legality, also to inform each one of the safeguards set up to guarantee confidentiality.

To this end, the Head of Internal Audit of Banca IFIS annually draws up the “Annual report on the correct functioning of the violation reporting system” and submits it to the Board of Directors for approval.

This document contains the following information:

- the number of violation reports made, broken down into admissible and inadmissible;
- the number of violation reports divided by area and severity;
- the type of actions taken during the year (excluding any individual measures).

This annual report is made available to personnel through the company portal, where this Policy is also published.

OUTPUT: Annual report on the correct functioning of the violation reporting system - *Head of Internal Audit*

Role	Stakeholders involved
Responsibility	Head of Internal Audit of Banca IFIS
Operating Support	-
Consulted	-
Approval	Board of Directors of Banca IFIS
Informed	All personnel

The following table illustrates the detailed information that must be sent:

- main expected *outputs*;
- subject responsible for the related drafting;
- recipients;
- frequency.

Process Phase	Output	Responsibility	Recipient	Frequency
<i>Report</i>	Reporting the violation	Personnel	Head of Internal Audit of Banca IFIS.	Per event
<i>Investigation into the violation report</i>	Investigation into the violation report	Head of Internal Audit of Banca IFIS	<ul style="list-style-type: none"> - For the reports handled by the Head of Internal Audit of Banca IFIS: Chief Executive Officer and General Manager of Banca IFIS as well as, where relevant, the body with management functions of the Subsidiary as well as the Supervisory Body of the Parent Company and, if pertinent, the Supervisory Body of the Subsidiary where present. - The Chairman of the Parent Company's Board of Statutory Auditors in cases of potential incompatibility. 	Per event
<i>Reporting</i>	Annual report on the correct functioning of the internal whistleblowing system	Head of Internal Audit of Banca IFIS	Board of Directors of Banca IFIS, subsequently made available to all Group personnel.	Annual