

To all AVSI Worldwide staff

Dear all,

The Organizational Unit DHRG has issued the **GP-DHRG-30 Whistleblowing Policy** General Procedure prepared using the new classification rules and new criteria set out in GP-DIGE-01 Document Management Operating Procedure, issued July 12th, 2022. You should already have a copy of this. This general procedure fully replaces DIGE 4 – 2018 Whistleblowing Policy.

AVSI Foundation has made available to all staff, contract workers, consultants and other stakeholders a Whistleblowing Platform to report events or facts that can be used to ascertain whether a violation has been committed that falls under the scope of application of Italian Legislative Decree 24/2023. You can access the platform at <http://whistleblowing.avsi.org>

Violations may include misconduct pursuant to Italian Legislative Decree, the 231 Model, the Code of Ethics, the organization's internal regulations, and European Union laws as indicated in Italian Legislative Decree no. 24/2023.

Anyone making a whistleblowing report must refer to events and facts that he or she becomes aware of in his or her working context.

Italian law on whistleblowing protects anyone reporting a breach of national or European Union law that they become aware of and that relates to a particular entity or organization. Italian Legislative Decree 24/2023 requires employers to fulfil certain obligations to ensure that workers and third parties are fully protected.

Pursuant to Italian Legislative Decree 24/2023 on whistleblowing, AVSI Foundation will ensure that the identity of a whistleblower remains confidential and that he or she will be protected from any retaliation or discriminatory behavior caused by his or her report.

Please read the **GP-DHRG-30 Whistleblowing Policy** and the privacy information, both of which are available on the AVSI Foundation website (www.avsi.org) and on Sharepoint <https://fondazioneavsi.sharepoint.com> in the "Processes" section which can be accessed from the home page using your login details.

In brief, the policy answers the following questions:



Who can make a whistleblowing report?

Anyone who represents the Foundation, anyone who has an administration or direction role, or anyone who manages or controls, even on a de facto basis, business activities; all employees and contract workers regardless of their contractual relationship with the Foundation; anyone who cooperates with and helps the AVSI Foundation – for any reason – to achieve its objectives and – more generally – anyone with ties to the Foundation, regardless of his or her legal relationship with it (e.g., suppliers, consultants, collaborators, partners, candidates, former employees, etc.).



What can be reported?

Breaches of national or European Union law, or internal regulatory provisions which a whistleblower becomes aware of in a public or private working context. In any case, any report made using the reporting channels described in the AVSI whistleblowing policy, will be taken into consideration to the extent permitted by its relevance and verifiability.



What cannot be reported?

Disputes, claims or requests of a personal nature that relate solely to an individual employment or work relationships or that relate to employment or work relationships with hierarchically superior figures.



How do I make a whistleblowing report?

- You can make a written report using an online platform that can be accessed from any browser (including mobile devices) at the following link <https://whistleblowing.avsi.org>. This channel is the most confidential way for whistleblowers to send reports.
- You can make a report by phone, by leaving a message on the dedicated voicemail service. The number to call is +3902674988408 You will then be able to make a phone or face-to-face appointment



Who will receive the whistleblowing reports?

The Whistleblowing Committee will receive all whistleblowing reports reported both through written and oral channels,. The Committee is made up as follows:

- i. the members of the Supervisory Board
- ii. the Human Resources coordinator
- iii. the Safeguarding Policy Focal Point



How are whistleblowers protected?

A whistleblower's identity will always remain confidential. Whistleblowers will also be asked for their consent before their report is sent to anyone who is not the manager of whistleblowing reports in order for the report to be investigated.

Whistleblowers will always be protected from any retaliation which may be brought against them.