

Communication regarding the entry into force of Legislative Decree 10 March 2023, no. 24

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Notice on reporting crimes pursuant to Legislative Decree no. 231/2001 and on reporting violations of EU and national regulations pursuant to Legislative Decree no. 24/2023

This communication notice ("Notice") is provided for the benefit of third parties (Customers, Suppliers, Consultants, etc.) who enter into a relationship with NTT Italia S.p.A. and does not contain information that the data subject already possesses, pursuant to articles 13 (4) and 14 (5) of the EU Regulation 2016/679 ("GDPR").

The NTT Ltd Group, of which NTT Italia S.p.A. is part, has long had a Code of Ethics, which can be consulted at <https://services.global.ntt/en-us/legal>. NTT Italia S.p.A. has also a Management and Organization Model under Legislative Decree no. 231 of 8th June 2001 (to which reference is made in the training sessions on "Corporate administrative liability" under the aforementioned Legislative Decree no. 231/2001). The aforementioned "231 Model" was adopted and approved by the Board of Directors and can be consulted at <https://services.global.ntt/en-us/legal/policies-and-statements>.

On 30th March 2023, Legislative Decree no. 24 of 10th March 2023 (hereinafter "*Whistleblowing Decree*") came into force which implements Directive (EU) 2019/1937 regarding the protection of persons who report violations of European Union law and/or violations of national and community regulations and regulates such reports.

Under the provisions of the above-mentioned *Whistleblowing Decree*, private sector entities are required to activate their own channels of "internal reporting", regarding the aforementioned violations and designed to guarantee the confidentiality of the identity of the reporting person, of the person/s involved and of the person/s mentioned in the report, as well as the confidentiality of the content of the report and related documentation.

In compliance with the provisions of Legislative Decree no. 24/2023, NTT Italia S.p.A. has established an internal reporting channel that guarantees compliance with the *Whistleblowing Decree* and can be accessed through the NTT Group website, here www.speakupfeedback.eu/web/ntt.

If, for one of the reasons provided for in the *Whistleblowing Decree* (see Article 6 of Legislative Decree no. 24/2023), it is not possible to proceed with the report through the internal channel indicated above, it will be possible to access the "external reporting" service made available by the National Anti-Corruption Authority (ANAC) by following the following link: <https://www.anticorruzione.it/-/whistleblowing>.

The body responsible for the management of the report and/or the Supervisory Body, who are the recipients of the internal report, are legally obliged to guarantee the confidentiality of the report, protecting both the reporter and the reported party, as well as any other persons in any way referred to or referenced in the report itself.

NTT Italia S.p.A.

Società soggetta all'attività di direzione e coordinamento da parte di NTT Germany Holdings GmbH
Cap. Soc. Euro 4.591.000 i.v. Cod. Fisc e P.IVA 12481740152 – Trib. MI Reg. Soc 126072/1998 – R.E.A. 1558934
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Filiale: Via Mario Bianchini, 51 - 00142 Roma

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Fax NTT Italia Spa: +39 0238585160

Personal data contained in the report will be processed in compliance with current legislation (reference to EU Regulation no. 679/2016 - GDPR and Legislative Decree no. 196 of 30th June 2003 as amended by Legislative Decree no. 101 of 10th August 2018).

Personal data that is clearly not useful for the processing of a specific report or that is not strictly relevant to the report itself will not be collected, or if collected accidentally, may be deleted immediately if the form of the report allows it. In any report that is decided to be submitted to NTT Italia S.p.A., it is recommended not to include personal information or data of the reporter, reported party or other persons that are not strictly relevant to the report itself.

Please note that the *Whistleblowing Decree* protects the reporter from retaliatory activities.

Retention period.

The report will be used for the time necessary to follow it up; however, the same report will be deleted or anonymized five years after the date of communication of the final outcome of the reporting procedure.

Data subject's rights

The rights under Articles 15 to 22 of the GDPR can be exercised within the limits provided for in Article 2-undecies of Legislative Decree no. 196 of 30th June 2003.

Please note that if the report is found to be defamatory or, in any case, unsubstantiated and made with intent or gross negligence, the reporter will be held responsible for the statements contained therein.

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