





The checklist to organize whistleblowing implementation in the Company and evaluate its effectiveness

Before implementation ————————————————————————————————————	
	Compliant IT system  The company needs to ensure that the IT system it intends to use and its regulations are compliant with current laws and regulations, such as EU Directive 2019/1937 and GDPR for privacy.  Legality Whistleblowing
	Flexibility of the software solution  The software platform for whistleblowing management must be flexible to adapt to the goals and organizational model of the Company. Legality Whistleblowing offers a wide range of configuration options that meet the needs of any organization, public or private.  Legality Whistleblowing
$\bigcap$	Confidentiality of whistleblower's identity
	The basis of any whistleblowing system must be the confidentiality of the identity of the whistleblower. Only the team designated to receive and handle whistleblowers should be granted access to it.  Legality Whistleblowing
$\bigcap$	Assigning responsibility for handling whistleblowing reports
	The firm must identify internally or externally the right people with specific professional qualifications who will be responsible for receiving and handling claims, such as the Compliance Manager. To manage the whole process, the company will therefore need a dedicated team that operates and communicates according to well-defined rules.
	Anonymous or confidential reporting?
	You can choose to make reports completely anonymous, or you can choose to make the identity of the reporter visible only to those who handle them. Both options have pros and cons, which should be carefully considered to configure the system.  Legality Whistleblowing
$\bigcap$	Accessibility of whistleblowing channels
	Whistleblowing channels should fit the cultural environment in which the whistleblower management system operates and the varying preferences, accessibility, and capabilities of potential whistleblowers. Therefore, the ability to report in both written and oral form should be provided so that the system is accessible to all potential users.
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	Define KPIs for effectiveness
	KPIs (Key Performance Indicators), the metrics by which the performance of certain processes is evaluated, are critical to ensuring that the whistleblowing system works after implementation. Among the most important in the corporate

environment are the average number of days it takes to close reports, the number of active cases, the number of cases

by type, and the analysis of cases by geographic area, location, or department.



## After implementation

## Communication with employees-even temporary employees-and stakeholders

For it to "come to life," the firm must train employees on how and when to use the system, ensuring that they are not penalized for reporting misconduct. The whistleblower management system must be made available to employees, workers and collaborators of companies that provide goods or services and carry out works in favor of the administration; in the provisions of EU Directive 2019/1937, even individuals who are even temporarily in working relationships with the administration, even if they do not have the status of employees - such as interns and trainees - must be considered potential whistleblowers.

Finally, it would be appropriate, if relevant to the company, to also open whistleblower channels to people working under the supervision or direction of business partners and third parties, to include potential whistleblowers in the company at large.

## Monitor KPIs periodically

It is critical that staff responsible for handling whistleblowers keep track of the selected indicators, using the statistics available in the software platform, not only to prepare reports for senior management, but also to check that they are still relevant to determining the effectiveness of the system. If not, they can be modified or new ones added.

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Choosing a software that has extensive configuration options and that adapts to your Organization's needs is critical to comply with regulations and simplify system implementation and management.

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The platform developed to meet the highest , requirements for **security** and confidentiality

