

FAQ
Management of Whistleblowing
Reports



Who can submit a report?

Employees, self-employed workers, collaborators, volunteers and trainees, including unpaid people, who work for FS S.p.A.; workers or collaborators, who work for entities that provide goods or services or carry out works for third parties; freelancers and consultants who work for FS S.p.A.; shareholders and FS S.p.A. employees with administrative, management, control, supervisory or representative roles. These people report on breaches of which they have become aware as part of their job.

Reports may be submitted:

- a) when the legal relationship has not yet begun, if information on breaches was acquired during the recruitment process or at other pre-contractual stages;
- b) during the probationary period;
- c) after the termination of the legal relationship if the information on breaches was acquired during the relationship.



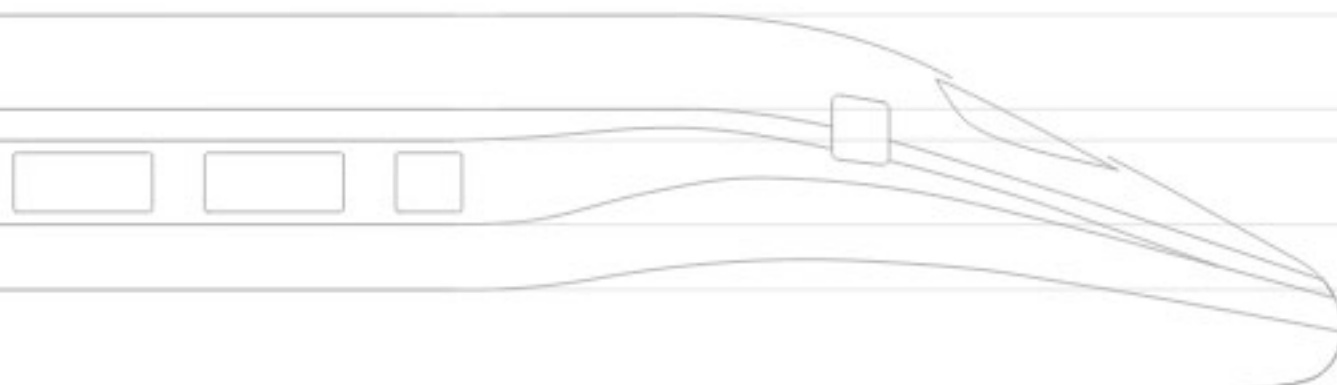
What can be reported?

Information on breaches involving facts (of any nature whatsoever, even if merely omissive), attributable to FS Italiane Group Employees or Third Parties, which may constitute:

- 1) breaches of the FS SpA Model 231 and procedures for its implementation and/or of the Anti-Corruption Policy and the FS SpA Anti-Bribery&Corruption management system (hereinafter "ABC system") and/or of the Code of Ethics and/or of the company's internal regulations and/or in any case likely to cause damage or harm, even only in terms of image or reputation, to the FS Group;
- 2) administrative, accounting, civil or criminal offences;
- 3) unlawful conduct pursuant to Legislative Decree No. 231 of 8 June 2001;
- 4) offences under the scope of European Union and national provisions implementing them;
- 5) acts or omissions detrimental to the financial interests of the European Union;
- 6) acts or omissions concerning the internal market (e.g. competition and state aid violations);
- 7) acts or conduct that undermine the object or purpose of the European Union provisions.

The reports must concern facts of which the Whistleblower has direct knowledge, with the Whistleblower having well-founded reasons to believe that the information reported is true at the time of the report.

Reports must be made promptly upon becoming aware of the facts in question in order to ensure that verification is fully possible.





How can a report be sent?

FS SpA provides the following channels for submitting reports:

- *IT platform*: that can be accessed from the FS SpA website - www.fsitaliane.it - and the company intranet. This should be considered as the preferential channel as it is more suitable to guarantee, by means of IT modalities, confidentiality with regard to the identity of the Whistleblower and adequate information security measures;
- *ordinary mail*: to the Ferrovie dello Stato Italiane SpA address, Technical Secretariat Ethics and Reporting Committee c/o FS SpA Auditing - Piazza della Croce Rossa, 1 - 00161 Rome or Supervisory Body c/o FS SpA Auditing - Piazza della Croce Rossa, 1 - 00161 Rome;
- *e-mail*: to the address comitatoetico@fsitaliane.it or Segnalazioni.231@fsitaliane.it;
- *phone with Interactive Voice Response* accessible via the dedicated telephone number for FS SpA +39 0682950710, which provides for the recording of the call with the express consent of the Reporting person and alteration of the recorded voice;
- *verbally*: through a statement issued by the Whistleblower to the FS SpA Ethics and Reporting Committee/Supervisory Board, at a hearing set within a reasonable period of time, recorded in the minutes and signed by the Whistleblower.



Why should a report be made?

Reports may enable the company to promptly detect and remedy unlawful or irregular events that may harm the interest and integrity of the Group or of third parties.



What guarantees does FS SpA provide if you file a report?

In compliance with the provisions of the law, FS SpA guarantees the confidentiality of the Whistleblower's identity as soon as the report is received and prohibits (and penalises to the extent permitted by its powers and authority) any direct or indirect form of retaliation or discrimination against the Whistleblower as a result of a report, including omissive conduct, also attempted or threatened, or directed at third parties associated with the Whistleblower, such as relatives, colleagues, legal entities owned by or working for the Whistleblowers, who are operating with the FS Italiane Group.

The Whistleblower is informed when the report is received and the results of investigations into the report.



What protection does FS SpA provide to the Involved Person (person named in the report)?

FS SpA protects the rights of Involved Persons, first of all by ensuring, in order to guarantee appropriate confidentiality, that any disclosure of their identity strictly follows the "need to know" criterion.

The Involved Person is informed of the existence and content of the report and receives a copy of the same, excluding any reference to the Whistleblower's identity, which may not in any event be disclosed to the Involved Person, except in the cases expressly provided for by law.

The Involved Person has the right to be informed of the outcome of the investigation, except in the cases expressly provided for in the relevant company procedure.



Can a report be submitted anonymously?

Reports can be sent anonymously. However, FS SpA encourages that the Whistleblower's identity be disclosed in the report, for which confidentiality is guaranteed in compliance with the legislation in force, so that the reported facts can be verified more easily and the Whistleblower can be informed of the results of the investigations carried out.



What does FS SpA do once a report is received?

The corporate bodies in charge (the Ethics and Reporting Committee and the Supervisory Board) check the content of the report and perform fact-finding activities on the reported facts to verify their validity and allow measures to be taken to prevent or sanction the irregularities or offences identified.



How is protection from slanderous or defamatory reports guaranteed?

Slanderous or defamatory reports are prohibited and sanctioned in accordance with the law and by the Company's disciplinary measures.



How is personal data processed?

Personal data is processed in compliance with the relevant applicable legislation. All information on the processing purposes and methods are available on the FS SpA website and on the company intranet.

