

**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  
(the "Notice")**

This Notice is sent to all NTT Italia employees as an addition to prior communications, and therefore, pursuant to articles 13 (4) and 14 (5) of the EU Regulation 2016/679 ("GDPR"), it lacks information that the data subject has already received.

The NTT Ltd Group, of which NTT Italia S.p.A. is a 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 above mentioned "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 30<sup>th</sup> 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.

This is to inform that NTT Italia S.p.A. has established an internal reporting channel that guarantees compliance with the *Whistleblowing Decree* and is accessible through the NTT Group website, here [www.speakupfeedback.eu/web/ntt](http://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 (so-called "internal reporting"), it will be possible to access the service made available by the National Anti-Corruption Authority (ANAC) by following the following link: <https://www.anticorruzione.it/-/whistleblowing> (so-called "external reporting").

The 231 Supervisory Body or the body responsible for the management of the report, 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.

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.

Personal data that is clearly not useful for the processing of a specific report will not be collected, or if accidentally collected, may be deleted immediately, if the form of the report allows it.

**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  
Sede Legale e operativa: Via San Bovio, 1-3 – 20054 Segrate (MI) – Tel. +39 02 38583840  
Filiale: Via Mario Bianchini, 51 - 00142 Roma  
Filiale: Via S. Crispino, 46 – 35129 Padova  
Fax NTT Italia Spa: +39 0238585160

Please note that the *Whistleblowing Decree* protects the reporter from retaliation 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 (5) 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 30<sup>th</sup> 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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