

HQBuild S.p.A.

Reporting Procedure, Whistleblowing, Anonymous Complaints and Internal Surveys

HQBuild promotes a corporate culture based on integrity, transparency and accountability. To this end, it has established a reporting mechanism that allows employees, collaborators, suppliers and other stakeholders to safely communicate any behaviour that does not comply with ethical principles, laws, the Code of Ethics or ISO 37001:2025.

Whistleblowing

A dedicated whistleblowing telephone channel is active (freephone number 800 835 973 – free from Italy), accessible also anonymously, through which the following can be reported:

- violations of laws or regulations;
- abuse or misconduct;
- risks to health, safety, the environment or human rights;
- practices contrary to the company's ethical values.

Reports are handled by an independent person (R_SISTEMA ABMS), who guarantees confidentiality, timely analysis and respect for the rights of all parties involved.

Any form of retaliation or discrimination against those who report in good faith is prohibited.

Anonymous Complaints and Suggestions

In addition to the formal whistleblowing channel, the Organisation provides a dedicated system at the following link: <https://segnalazioni.iltigliosrl.it/4FA45087-D311-4279-A34A162EE11D783C>, to receive complaints or suggestions also anonymously. These tools allow anyone to highlight problems, propose improvements or report risks without fear of personal consequences.

Internal Surveys and Employee Listening

Periodically HQBuild promotes internal climate and listening surveys, to confidentially gather opinions, proposals and perceptions of staff on ethical, social and organisational aspects.

The results are analysed to identify areas for improvement and to strengthen employee participation in the Anti-Corruption Prevention system.

HQBuild is committed to:

- maintaining accessible and protected reporting channels;
- guaranteeing confidentiality and protection of the reporter;
- ensuring impartial and traceable management of reports;
- promoting training and awareness on the correct use of internal communication channels.

The right to report and the duty to listen are fundamental tools for building trust, preventing risks and continuously improving the ethical and anti-corruption behaviour of the Organisation.