



> Highlights

> Directors' report integrated report

> Consolidated non-financial statement

> Consolidated Financial Statements

# GOVERNANCE

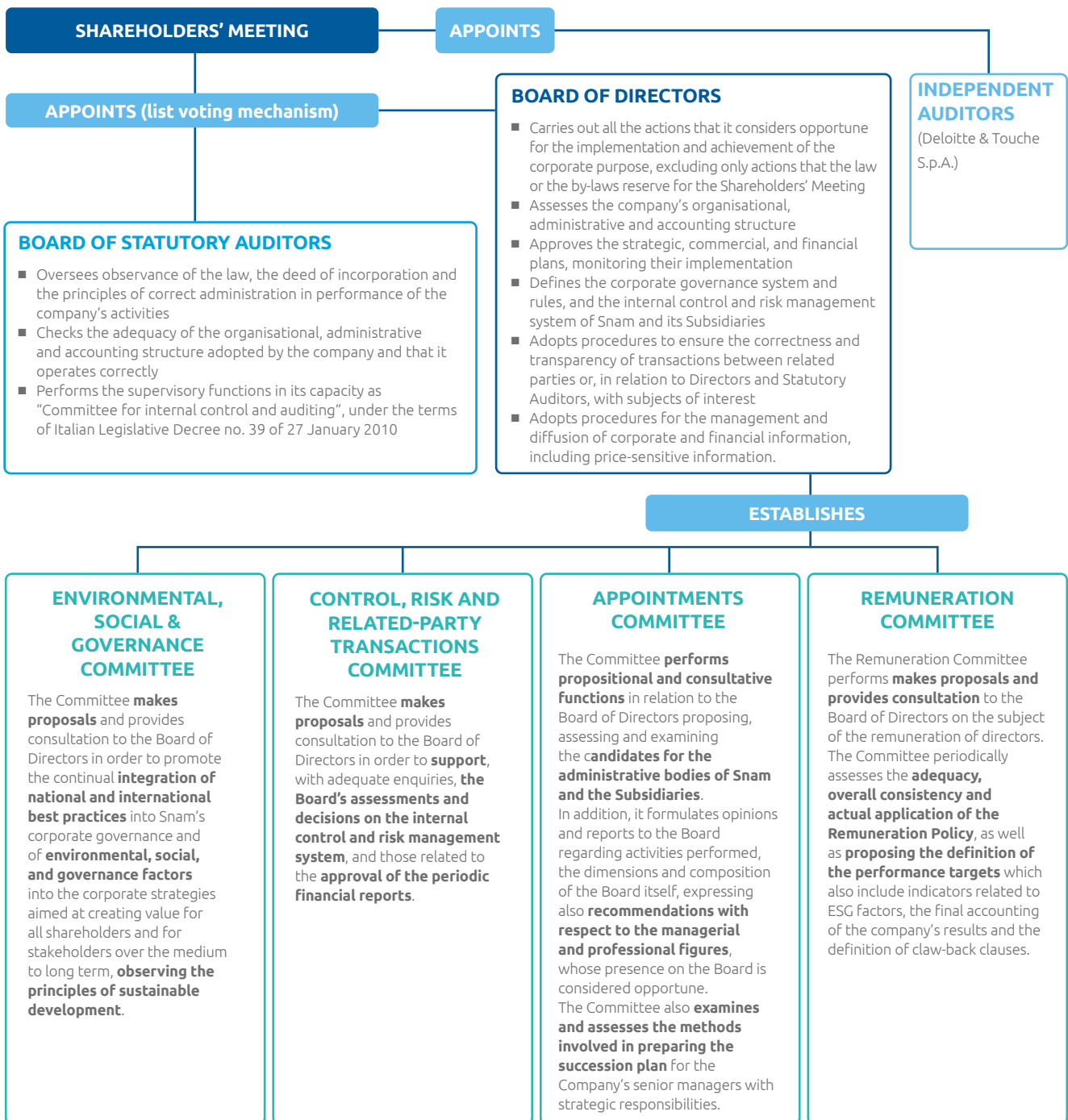
# GOVERNANCE AND ORGANISATION

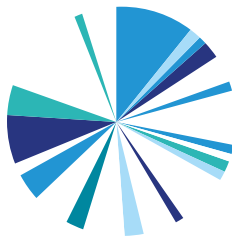
NFS

TCFD

Snam's governance system fosters dynamics that create value and facilitate the conditions for the **proper and adequate interaction between the company and the context of reference**. These objectives are pursued on the basis of Snam's *modus operandi* principles: **integrity, transparency and compliance with regulations**, both internally and externally, to guarantee a clear and sustainable growth strategy that satisfies the interests

of all the stakeholders. The **governance system** reflects this traditional model and is developed in compliance with the regulations in force and applicable across the sector (regulations for listed companies and unbundling regulations), in consideration of **Italian and international best practices and the principles of the Group's Code of Ethics**.




[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)


All BoD committees  
are chaired by

**INDEPENDENT  
DIRECTORS**

Furthermore, Snam adheres to the UN Global Compact, the most important international sustainable development initiative, aimed at promoting and spreading the ten global ethical principles concerning human rights, environmental protection, workers' rights and anti-corruption.

As specified in the Company by-laws, following the approved amendment by the extraordinary shareholders' Meeting of 2 February 2021, the Group aims to pursue successful sustainable practices through the creation of long-term values which benefit the shareholders, taking into consideration the interests of other stakeholders that are significant to the Company. Snam also operates under the frameworks of OECD **Guidelines for Multinational Businesses**, the **UN Declaration of Human Rights the fundamental Conventions** of the ILO guidelines and its own **Code of Ethics**, that is also an integral part of the Organisational Model of Legislative Decree 231/2001.

Snam already complies with a substantial proportion of the recommendations contained in the Corporate Governance Code published by the Corporate Governance Committee in January 2020 and which officially entered into force from 2021. Snam's efforts and commitment lead to its classification, in 2020, as one of the best Italian Companies for corporate governance and integration of ESG factors (environmental, social and governance) in corporate strategies, according to the annual Integrated Governance Index survey carried out by ETicaNews and TopLegal.

The Meeting of 2 April 2019 established nine directors for a term of three years in office, due to expire at the date of the 2022 Meeting for the approval of the balance sheet at 31 December 2021.

## BOD COMPOSITION

Snam's Board of Directors instituted the following four Committees: the Remuneration Committee, the Appointments Committee, the Control, Risk and Related-Party Transactions Committee, the Environmental, Social & Governance Committee. The composition, roles and function of the Committees are governed by the Board and set out in specific regulations. The Board assigns Committee members. The Committees are composed of three non-executive directors, the majority of which are independent, except the Control, Risk and Related-Party Transactions Committee that is composed of independent directors only.

With the aim to optimise corporate processes, including the functioning, efficiency and effectiveness of the BoD, a **Board Evaluation** process has been implemented since 2019, aimed at assessing the Board and internal Committee operations by passing judgement on the activities carried out and identifying elements that could improve their performance. The Board Evaluation process has been entrusted to an independent advisor.

Considering the key principles of transparency and integrity, comprising the foundation of the corporate structure, Snam is committed to identifying the information flows between corporate bodies and effectively defining the

More detailed information on governance and remuneration can be found in the document "2020 Report on corporate governance and ownership structure" and the "2021 Remuneration Report", published online at [www.snam.it](http://www.snam.it) at the same time as the Annual Report.



**BoD Composition**

**67%**  
OF THE BoD ARE INDEPENDENT DIRECTORS\*

\*  
5 of 9 directors are qualified as independent pursuant to the Consolidated Law on Finance (TUF) and the Code of Corporate Governance and the Chairman is qualified as independent pursuant to the TUF.

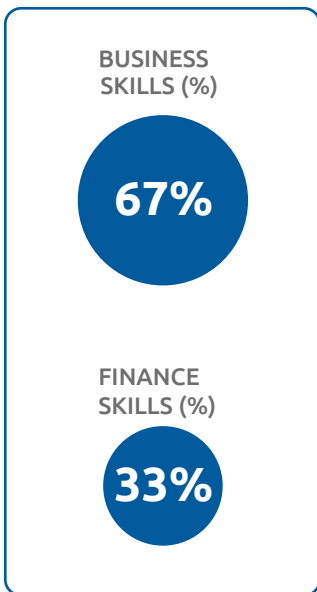


WOMEN  
**33%**

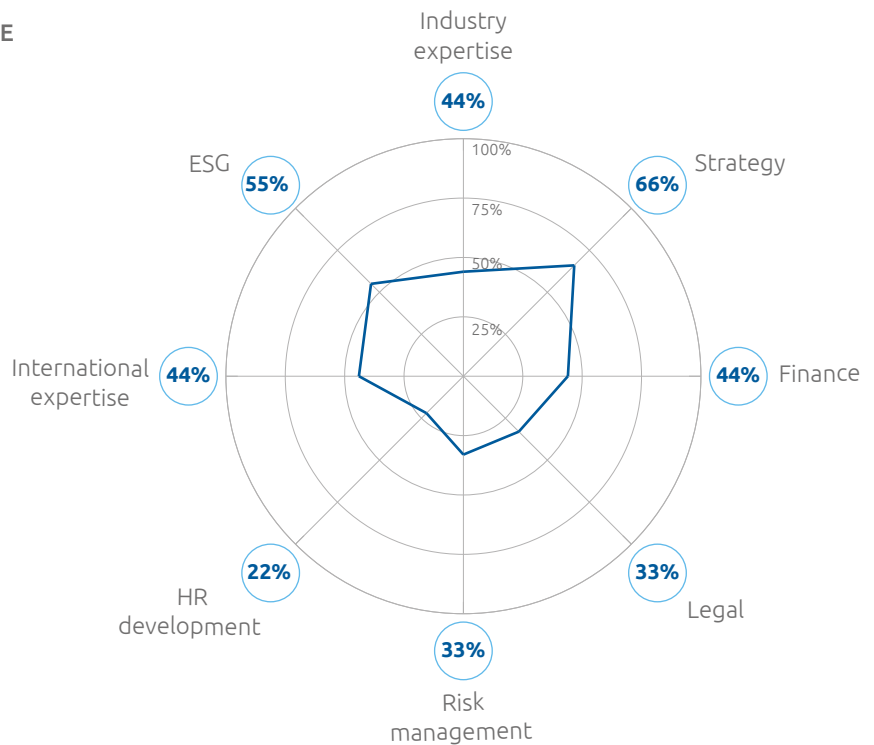


MEN  
**67%**

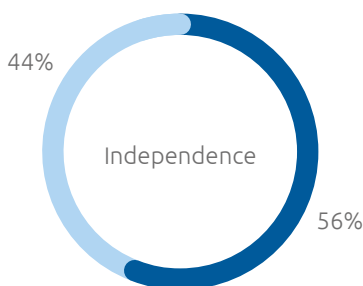
IN 2020, **12** BOD MEETINGS WERE CARRIED OUT WITH A **100%** PARTICIPATION RATE



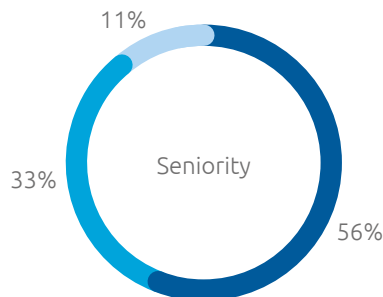
**Diversity and skills matrix**



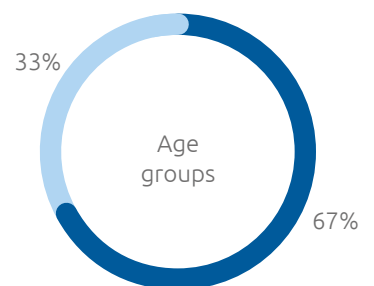
**BoD Composition**



● Independent  
● Non Independent



● 1-3 years ● 4-6 years  
● 6-9 years



● 30-50 years  
● >50 years


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)

internal Control and Risk Management System. Snam exercises management and coordination activities through the implementation of **Guidelines on Corporate Governance** which define the principles, contents, instruments and operating methods of strategic activities carried out by Snam in line with its own corporate

## SUSTAINABILITY GOVERNANCE

The Board of Directors plays a central role in overseeing the company's commitment to sustainable development along the value chain. Sustainability issues are always a central focus of the Board of Directors that dedicated 41% of its meetings to ESG issues in 2020.

Since 2016, the Board of Directors has been assisted with these tasks by the Sustainability Committee, replaced in May 2019 by the ESG Committee, that makes proposals and provides advice and is made up of three non-executive directors, two of which are independent, including the Chairman. The Committee is responsible for the promotion

and integration of environmental, social and governance factors in corporate strategies in compliance with sustainable development, as well as the coordination of the preparation of non-financial information. In 2020, the ESG Committee met 18 times, with a participation rate of 98%, and addressed issues relating to climate change on various occasions, analysing, in particular, the Group's results and Snam's strategies with regards to reaching the established decarbonisation targets.

### Climate change governance

In compliance with the TCFD recommendations, Snam is committed to maintaining and strengthening its governance system with the aim to support the Company initiatives in the fight against climate change.

To this end, activities have been implemented to ensure the comprehensive monitoring by the Board of Directors of climate change risks and opportunities, and opportunities aimed at ensuring the correct management of these issues by the management department when running its activities.

Based on the proposal of the CEO, the Board of Directors plays a fundamental role in spreading and integrating a culture aimed at reversing climate change. As such, the Board regularly assesses and approves:

- climate change and energy transition targets, an integral part of corporate strategies, included in the annually approved strategic Plan;
- Snam's strategic risks, including annually assessed climate change risks;
- the share-based long-term incentive plan with goals relating to reducing gas emissions, consistent with the Strategic Plan guidelines for the CEO and managers, with a greater impact on annually

- approved company results;
- the annual sustainability results and the HSE reassessment, including their impacts on climate change;
- institutional reporting that comprises the half-year and annual Report (including the Consolidated Non-Financial Statement - NFS), the Sustainability Report and the Financial Disclosure on Climate Change;
- the information provided by the Committees and, specifically by the ESG Committee, pursuant to the relative Regulation on information disclosed to the Board after every Committee meeting.

As one of the initiatives aimed at making climate change a priority for management bodies, the new Plan envisages the continuation of board induction sessions for the BoD, as a means to keep its members informed about climate change issues and initiatives. In particular, according to the ESG Scorecard, it was foreseen that the BoD dedicates at least 40% of its time on ESG matters during meetings or board induction sessions.


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)

## SNAM'S ORGANISATIONAL MODEL

We manage our business in accordance with the Corporate System Framework, the organisational and procedural system applied across all Group companies in Italy and abroad, created to ensure that the system of rules governing the business is clear, simple and organic. The system is inspired by the **Code of Ethics**<sup>13</sup> and is based on management policies, described in the following chapters, based on the principles enunciated by the **United Nations Universal Declaration of Human Rights**, the **Fundamental ILO Conventions** and the **OECD Guidelines for Multinational Enterprises**.

In order to successfully implement this system, managerial actions need to be based on the allocation of specific objectives to each position of responsibility and on the transparent assessment of results, thereby enabling continual improvements in the effectiveness and efficiency of corporate processes.

The organisational structure of Snam features four business units and staff functions, designed with a view to simplifying processes, efficiency and continuous improvement. The business units focus on four key Snam activities: (i) international development, (ii) management of Italian subsidiaries and development of technical services based on specialist skills and know-how for gas operators, (iii) energy transition business development, and (iv) hydrogen business development.

Reorganisation of the corporate structure in 2019 was required to facilitate the integration and optimisation of corporate processes, especially in the context of energy transition and decarbonisation. All business units linked to biomethane, hydrogen, sustainable mobility and energy efficiency and international activities were implemented in 2019. In 2020, also in consideration of the impact that such activities will have on the 2020-2024 Strategic Plan, the role of these business units was further strengthened.

## SNAM'S REMUNERATION AND INCENTIVE SYSTEM

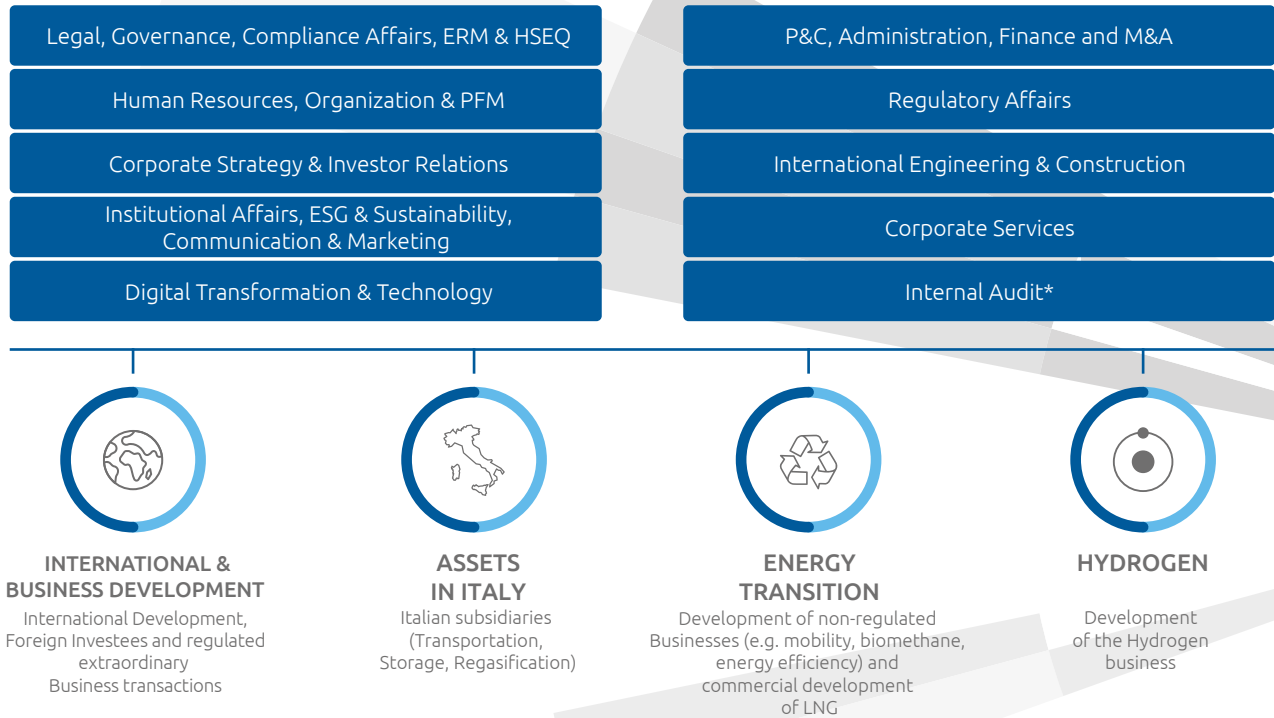
Snam is committed to providing a remuneration system that always aligns with international best practices, compliant with European and Italian regulations, and which supports and fosters the development of the Company consistently with its Strategic Plan.

Snam's remuneration system, guided by the Remuneration Committee, is aimed at recognising the responsibilities assigned to it, the results it achieves and the quality of the professional contribution provided by the Company management department and complies with the principles of people promotion and equal opportunities, established in the Code of Ethics and present, for some time, in Snam's organisational culture.

<sup>13</sup> Snam's Code of Ethics can be viewed on the Company's website at the following link [www.snam.it/export/sites/snam-rp/repository/file/Governance/codice-etico/codice\\_etico.pdf](http://www.snam.it/export/sites/snam-rp/repository/file/Governance/codice-etico/codice_etico.pdf).


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)


## BUSINESS UNIT



(\*) On behalf of the Board of Directors, the Chairman coordinates and makes use of the Head of Internal Audit, who reports hierarchically to the Board.

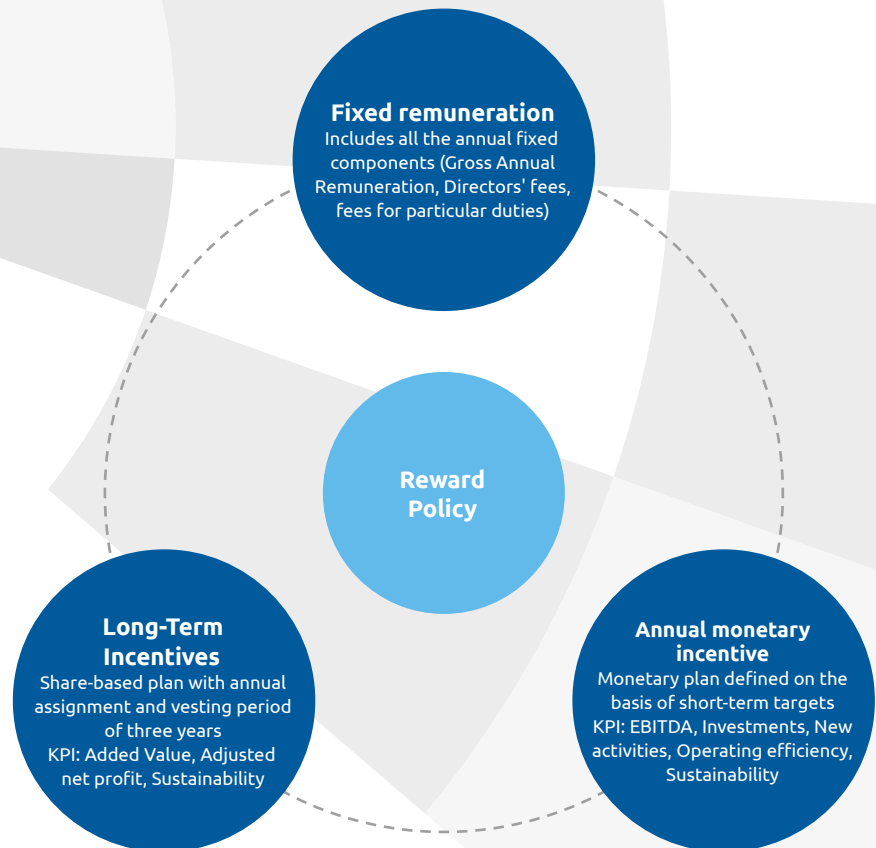
The remuneration system represents a fundamental instrument aimed at attracting, retaining and motivating team of high-quality management personnel who are able to run the company successfully, while aligning its actions with shareholders' interests and promoting the creation of value in the medium-long term.

For **managers**, the remuneration system breaks down into two parts: fixed remuneration, with possible annual adjustments for merit or progression of roles/responsibilities, and variable remuneration with incentives aimed at promoting professional contribution in the short-term, by assigning an annual monetary incentive (IMA), as well as in the medium-/long-term, by assigning a long-term share-based incentive (ILT). Also, managers are subject to claw-back mechanisms, aimed at recovering the variable portion if the resulting compensation is not due if it was earned based on targets that were attained as a result of malicious or grossly negligent behaviour or that were proven to be manifestly incorrect. Finally, the **Total Reward Statement** is an information package on the breakdown of individual remuneration that guarantees the promotion and transparency of the remuneration system for managers.


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)

For **the rest of the corporate population**, Snam adopts a short-term variable incentive plan intended to reward best performance and the young resources with potential for development. What is more, all companies in the Group implemented a "**Participation Bonus**", instituted by the National Collective Labour Agreement, based on the performance of profitability and productivity parameters, measured in relation to the targets agreed upon every year between the company and trade-union representatives.

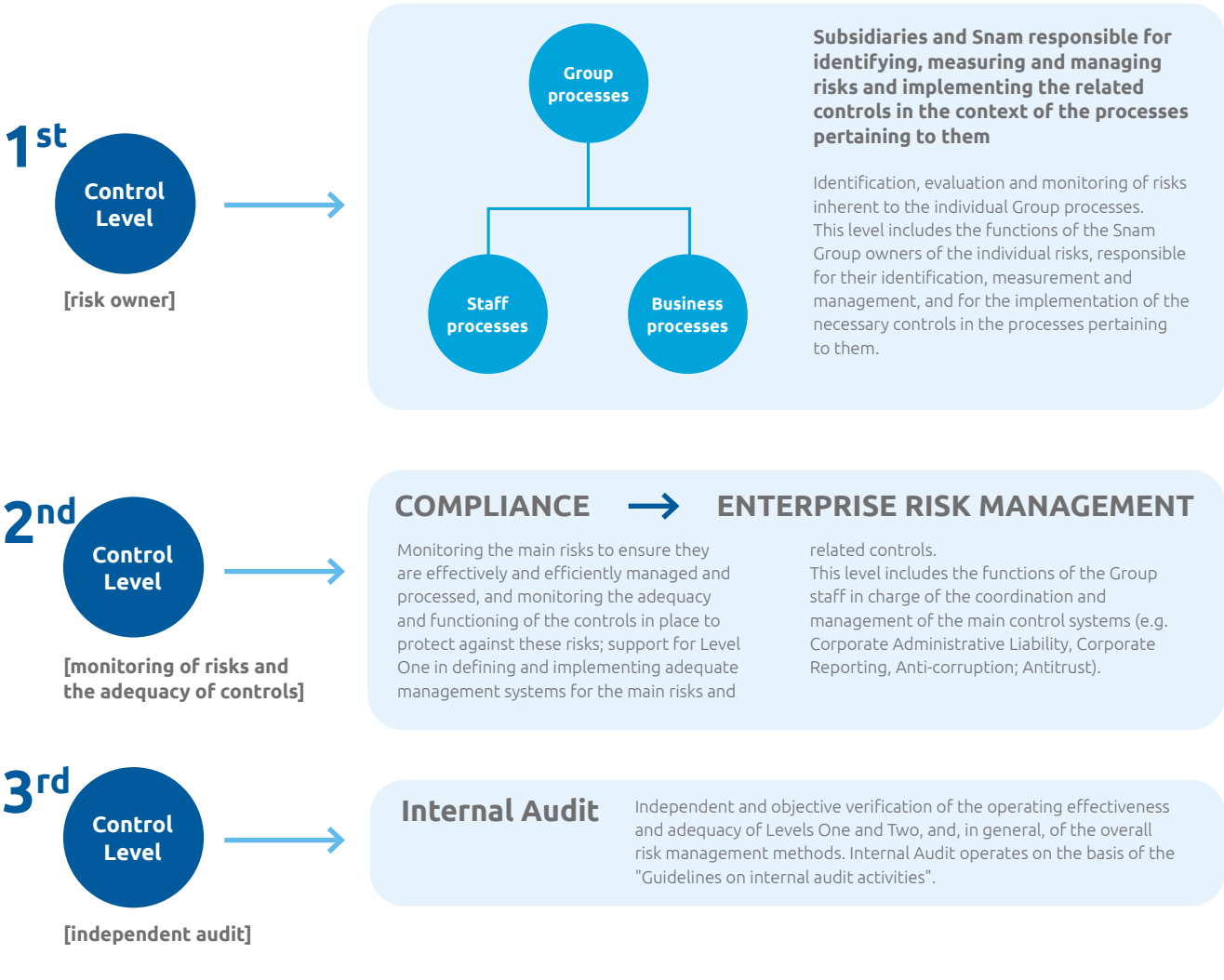
**The Snam 2020 Remuneration Policy**<sup>14</sup> for Directors, Auditors and Managers with strategic responsibilities<sup>15</sup> was approved in 2020. The document defines the new 2020-2022 long-term share-based incentive plan that prescribes the assignment of Snam ordinary shares after achieving performance goals measured over a three-year period. Sustainability plays an increasingly important role in the new Remuneration Policy which includes: the frequency index and the accident severity index, inclusion in the DJSI, FTSE4GOOD and CDP indices, and the Forestation Project.



<sup>14</sup> The Snam 2021 Remuneration Policy for Directors, Auditors and Managers with strategic responsibilities will be approved during the shareholders' Meeting of 28 April 2021.

<sup>15</sup> At Snam, managers with strategic responsibilities differ from Directors and Auditors, and have the following roles: Chief Financial Officer; Chief International & Business Development Officer; General Counsel; Executive Vice President Human Resources & Organization & PFM.

# NFS INTERNAL CONTROL SYSTEM





## INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

Although it has a limited economic and financial risk profile because most of its operations are in regulated business segments, Snam adopts a structured and systemic approach to governing all risks that could affect value creation.

Snam's **Internal Control and Risk Management System** is one of the Group's key elements and constitutes all the guidelines, regulations and organisational structures that allow for the **identification, measuring, management and monitoring of the most significant risks**, including those established under Art. 3, paragraph 1, of Legislative Decree 254/2016 (in relation to environmental, social and personnel-related issues, respect for human rights, and the fight against active and passive corruption), and the **monitoring of managerial processes**. This system is integrated into the organisational, management and accounting structure and, in general, into the corporate governance of Snam and is based on the Corporate Governance Code which Snam complies with, taking as references the national and international models and best practices.

The control system is divided into three levels, each with different objectives and associated responsibilities. The Board of Directors charges the **CEO with giving structure to and maintaining the entire system**. We use an integrated, dynamic and group-wide method of assessing risk that evaluates the existing management systems in the individual corporate processes, starting with those relating to the prevention of fraud and corruption and health, safety, environment and quality.

These same controls form an integral part of the managerial processes. Management must therefore foster an environment that encourages controls, and must specifically manage "line controls", consisting of all the control activities that individual operating units or companies perform over their own processes. Independent controls are performed by the Internal Audit department, which is responsible for checking that the system is functioning and adequate.

The Internal Control and Risk Management System is based on guiding principles contained in the **Code of Ethics**:

- the segregation of the activities of the persons in charge of the authorisation, execution, or control procedures;
- the existence of company regulations that can provide general benchmark principles for governing corporate processes and activities;
- the existence of formal rules for the exercise of signatory powers and internal authorisation powers;
- traceability (guaranteed through the adoption of information systems that can identify and reconstruct sources, information and checks carried out in support of the formation and implementation of the Company's decisions and financial resources management procedures).

The Internal Control and Risk Management System is audited and updated to ensure it is suited and appropriate to overseeing the main areas of corporate risk. In this context, and also in order to execute the provisions of the Code of Corporate Governance, Snam has adopted an ERM (Enterprise Risk Management) Model, considered in more detail in the "Risk Management" chapter of this document.

The corporate bodies, institutions and functions involved in the internal control system are the Board of Directors, the CEO who, employed by the BoD, is responsible for the structure that maintains the entire system, the Control, Risk and Related-Party Transactions Committee, the Board of Statutory Auditors, the Supervisory Body and the Guarantor of the Code of Ethics, the Officer responsible for the preparation of financial reports, and the Internal Audit Officer. In particular, the role carried out by the Internal Audit department is crucial in that it verifies the functionality and adequacy of the system, preparing periodic reports containing appropriate information regarding its own activities, the risk management procedures, and compliance with the plans defined to contain said information, as well as assuring the reliability of the information systems.


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)

## RISK ASSURANCE & INTEGRATED COMPLIANCE

Under the scope of the Internal Control and Risk Management System, Snam has approved **“Risk Assurance & Integrated Compliance” Guideline** with the aim to merge the second control level models and promote and facilitate compliance with the reference regulations and the prevention of offences. This is specifically achieved through the **Compliance Programme for the Prevention of Offences (CPPI)** that fully complies with the Code of Ethics and that is implemented and rendered operational through:

- the regulatory system;
- the corporate governance provisions adopted in conformity with applicable legislation and international best practices;
- the provisions, methodologies and activities of the models applied by the dedicated functions;
- an integrated Risk Assurance & Compliance process.

Under the scope of the CPPI, the elements significant for its implementation are the Risk Assurance & Integrated Compliance model, the reporting<sup>16</sup>, rewarding and penalty systems and training and communication.

The integrated Risk Assurance & Compliance model is intended to improve the perception of the checks by the various owners involved and to make the SCIGR even more efficient through better coordination and integration of the flows and interaction between the three lines of control, valuing the respective contributions.

Like in 2019, in 2020 Snam used the **Risk Assurance & Integrated Compliance (RACI)** information platform to coordinate and integrate the second level control information flows, maintaining the specific characteristics of the methodologies of each model<sup>17</sup>, with a synergistic approach, aimed at maximum rationalisation and overall efficiency. The RACI helped create an integrated data base (Risk & Control Register), where the models involved in the Risk Assurance & Integrated Compliance process share a single risk and control catalogue.

This repository makes it possible collect consistent and complete information and data in an integrated fashion to support the **decision-making processes of the top management and corporate bodies which receive dedicated reports.**

<sup>16</sup> The CPPI is also effective thanks to the contribution made by the adoption of a whistleblowing system. The Guideline "Anonymous reports received by Snam and subsidiaries" regulates the process of receiving, analysing and dealing with the reports from anyone, anonymously or confidentially [www.snam.it/export/sites/snamrp/repository/file/Governance/procedure/procedure\\_segnaiazioni/snam\\_segnaiazioni\\_anche\\_anonime\\_04.pdf](http://www.snam.it/export/sites/snamrp/repository/file/Governance/procedure/procedure_segnaiazioni/snam_segnaiazioni_anche_anonime_04.pdf).

<sup>17</sup> The prerogatives of the Chief Financial Officer in particular are preserved as a result of Article 154-bis of the TUF, with reference, among other things, to the preparation of adequate administrative and accounting procedures for preparing the financial statements and the consolidated financial statements as well as any other financial reports.


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)

## ORGANISATIONAL, MANAGEMENT AND CONTROL MODEL PURSUANT TO LEGISLATIVE DECREE 231/2001 (MODEL 231)

The **organisational, management and control model** pursuant to Legislative Decree 231/2001 (Model 231) constitutes an organic set of principles, rules and provisions concerning the control of each corporate process. The 231 Model plays a fundamental role in protecting the company from any conduct that may incur its administrative responsibility, pursuant to Legislative Decree 231/2001, in relation to offences committed or attempted in the interest or the benefit of the company by parties in so-called top management positions in the structure or by parties subject to their supervision and control.

Snam and subsidiaries adopted their own 231 Models<sup>18</sup> to prevent the offences referred to in the legislation on corporate administrative liability for the offences committed in the interests or for the benefit of the company, and they identified and appointed a **Supervisory Body**, for each of them, with autonomous initiative and control powers, in compliance with the laws and regulations.

The **CoSO Framework** (most recently published in May 2013) provides a basis for the analysis of corporate processes and the comparative analysis of the existing control environment and of the control systems. The Framework is the international reference model for the establishment, updating, analysis and assessment of the internal control system.

At the end of 2019, risk assessment and gap analysis activities were carried out through the "Risk Assurance & Integrated Compliance" model, created with the intention of uniting the entire risk and control detection and management system supporting business operations, aimed at updating the 231 Model of Snam and the subsidiaries.

This update also involved the offences introduced by Law 39/2019 (Fraud in sporting competitions, illegal gambling or betting and the use illegal gambling devices)

and by Legislative Decree 105/2019 (violation of national cybersecurity regulations).

According to the logic of the Risk Assurance & Integrated Compliance model, the scope of 231 was revised from an integrated logic which, starting from the specific nature of the original Sensitive Activities pursuant to the special part of the 231 Models, has made it possible to develop and apply an integrated analysis method for "Crime Risk" in line with the reference best practices.

The outcomes of these activities will make it possible to adapt the Special Part documents known as the "Processes, Sensitive Activities and Specific Control Standards of the 231 Model" for Group companies, giving evidence of the new 231 methodology applied.

Considering the importance of the principles of ethics and integrity, Snam dedicated a specific **training programme to spreading the principles and content of Model 231 and Legislative Decree 231/2001**. A Compliance Route was created and made available in the second half of 2019, aimed at the entire corporate population and arranged in 5 modules on the following themes: Model 231, Privacy, Market Abuse, Antitrust and Anti-corruption. Lastly, for some time Snam has been preparing, as part of the reporting management process (so-called whistleblowing)<sup>19</sup>, specific communication channels that the subsidiaries also refer to in addition to Snam.

Finally, under the scope of reporting management, the Group has, for some time, adopted specific communication channels, available to both Snam and subsidiaries. The management of the communication channels is entrusted to an external subject (Ombudsman), who ensures the receipt and analysis of each report received, applying criteria of maximum confidentiality suitable, among other things, for the protection of the integrity of the persons reported and the effectiveness of the investigations

<sup>18</sup> The 231 Model is available on the Company's website at [www.snam.it/export/sites/snamrp/repository/file/Governance/responsabilita\\_amministrativa\\_231/Modello-231\\_snam\\_finale\\_2019.pdf](http://www.snam.it/export/sites/snamrp/repository/file/Governance/responsabilita_amministrativa_231/Modello-231_snam_finale_2019.pdf).

<sup>19</sup> Detailed information on the topics discussed in this section can be found in the "Report on Corporate Governance and Ownership Structure 2019", available on the Company's website at [www.snam.it/it/etica-governance/relazioni-documenti/](http://www.snam.it/it/etica-governance/relazioni-documenti/).



## INTERNAL AUDIT ACTIVITIES

In 2020 the Internal Audit activities are carried out by ensuring that the conditions of complete independence and autonomy are preserved, as well as the due professional diligence, objectivity, and competence, as provided for by the Mission of the Internal Audit and by the Mandatory Guidance of the Institute of Internal Auditors and by the principles contained in the Code of Ethics.

The Internal Audit regularly carried out scheduled activities involving:

1. preparation of the proposed Audit Plan based on the measurement and prioritisation of the main corporate risks carried out by the ERM unit;
2. execution of the Audit Plan, composed of 14 measures, approved by the Snam Board of Directors on 18 March 2020, following the favourable opinion of the Control, Risk and Related-Party Transactions Committee and after carrying out three further audits not scheduled in the plan (spot audits);
3. monitoring of the implementation of corrective actions based on the recommendations that were provided during the audit;
4. development of the independent monitoring programme defined with the Chief Financial Officer under the scope of Snam's Corporate Reporting Control System;
5. confirmations of reports, including anonymous ones, of problems relating to the internal control and risk management system, the company's administrative responsibility, whistleblowing and
6. activities involving relations with Independent Auditors, also following the identification of the new single auditor for the Group for the years 2020-2028, following the tender launched by the Group CDP S.p.A., and those relating to monitoring activities for conferring additional tasks.

Regarding point 5), in 2020, Snam received 10 reports, 4 of which were anonymous. The Internal Audit department was appointed by the Supervisory Body to verify nine of these, while the other one was assigned to the Human Resources department.

The main issues reported in 2020 were in relation to alleged irregularities in the administrative management of purchase contracts; potential conflicts of interest between employees and personnel from companies providing services to Snam and subsidiaries and alleged

infringements of the Code of Ethics and corporate procedures. From the results of the analyses carried out on the 9 archived reports, and only with regards to substantiated and verifiable allegations, 7 of these were unfounded, according to the information reported, 1 was founded, and 1 was only partially founded. Moreover, actions to improve the Internal Control and Risk Management System were recommended for 6 reports (e.g., updating procedures, disciplinary provisions, communication and training).

Significant further actions carried out include:

- the implementation of the an external quality review, in compliance with International standards for the professional practice of Internal Auditing (so-called External Quality Review), to be carried out at least once every five years by an independent subject;
- the update of the relative Operating Manual to ensure it to be coherent with the amendments to the organisational structure of the unit and the new practices, also linked to the full operation of the IT tool for the management of audit activities;
- the update of the "audit universe" of audit objects, also in order to consider the organisational changes to the Snam Group that took place during 2020 and to include the new processes resulting from the acquisition of companies in relation to the new businesses;
- the adoption, with reference to the prevention of the Covid-19 emergency, of the necessary organisational and operational procedures to facilitate audit activities in the context of remote working, respecting the timeframes established and only implementing restrictions for on-site checks carried out during audits on operational processes;
- the management of specific requests came up during periodic meetings with Snam's control bodies.


[> Highlights](#)
[> Directors' report integrated report](#)
[> Consolidated non-financial statement](#)
[> Consolidated Financial Statements](#)

In 2020, audit activities were performed by a dedicated team of 11 auditors (average annual headcount):

### Internal Audit activities

(no.)	2018	2019	2020
<b>Total audits performed (planned and/or spot)</b>	14	15	<b>16</b>
<b>Report for independent monitoring activities (Law 262/05)</b>	8	19	<b>21</b>
<b>Reports received and processed</b>	4	11	<b>10</b>
- those involving the Internal Control System	-	1	<b>5</b>
- those involving accounts, audits, fraud, etc.	-	-	-
- those involving administrative liability pursuant to Legislative Decree 231/2001	-	-	-
- those involving violations of anticorruption law	-	-	-
- those involving other subjects (Code of Ethics, mobbing, theft, security, etc. (*)	4	10	<b>5</b>
<b>Reports archived due to a lack of elements or untruthfulness (**)</b>	2	6	<b>3</b>
<b>Reports concluded with disciplinary procedures/managerial action (***) and/or subject to Court Authorities</b>	2	5	<b>6</b>

(\*) The data for 2019 comprises the management of 4 integrations referring to 3 reports received during the year, one of which is currently under examination.

(\*\*) The data for 2019 was updated following the Archiving, in 2020, of a 2019 report.

(\*\*\*) The term "managerial" also refers to organisational/procedural interventions relative to actions aimed at improving the Internal Control and Risk Management System.