

**WHISTLEBLOWING POLICY**  
**SNAITECH S.p.A.**

December 2023

## **INDEX**

<b>1. DEFINITIONS</b>	<b>3</b>
<b>2. APPLICABLE RULES AND PROCEDURES</b>	<b>5</b>
<b>3. PURPOSE AND OBJECT</b>	<b>6</b>
<b>3.1 PURPOSE</b>	<b>6</b>
<b>3.2 WHAT IS A REPORT</b>	<b>6</b>
<b>3.3 PURPOSE OF THE REPORT</b>	<b>6</b>
<b>4. SUBJECTS INVOLVED</b>	<b>9</b>
<b>4.1 REPORTERS</b>	<b>9</b>
<b>4.2 REPORTS AND MANAGEMENT OF ANY POSSIBLE CONFLICT OF INTEREST</b>	<b>9</b>
<b>4.3 RECIPIENTS OF INTERNAL REPORTS</b>	<b>10</b>
<b>5. MINIMUM CONTENTS AND METHOD OF REPORTING</b>	<b>11</b>
<b>5.1 MINIMUM CONTENTS</b>	<b>11</b>
<b>5.2 REPORTING METHODS</b>	<b>11</b>
<b>6. INTERNAL REPORTING PROCESS</b>	<b>14</b>
<b>6.1 RECEIPT AND EVALUATION OF REPORTS</b>	<b>14</b>
<b>6.2 MANAGEMENT OF REPORTS</b>	<b>15</b>
<b>6.3 DEFINITION OF THE REPORT AND CONCLUSION OF THE CASE</b>	<b>15</b>
<b>6.4 SANCTIONAL OR LEGAL MEASURES</b>	<b>16</b>
<b>6.5 TRACEABILITY AND STORAGE</b>	<b>18</b>
<b>7. PROTECTION OF THE REPORTER AND OTHER INTERESTED PERSONS</b>	<b>19</b>
<b>8. PROTECTION OF THE REPORTED</b>	<b>20</b>
<b>9. CONFIDENTIALITY AND PRIVACY</b>	<b>21</b>
<b>10. PROCESSING OF PERSONAL DATA</b>	<b>22</b>
<b>11. ATTACHMENTS</b>	<b>24</b>

## 1. DEFINITIONS

- a) **Whistleblowing Committee** or Committee: collegial body specifically established with the task of managing the reports referred to in articles 4 and 5 of Legislative Decree 24/2023. The Committee is made up of members of the Supervisory Body.
- b) **Whistleblowing IT channel** or IT channel: the IT platform that allows the reporter to send reports.
- c) **Public Disclosure**: the act of placing information on violations in the public domain through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people.
- d) **Legislative Decree 231/2001 and subsequent amendments** or Decree 231: Legislative Decree no. 231 of 8 June 2001 on the "Discipline of administrative liability of legal persons, companies and associations, including those without legal personality", as subsequently amended and supplemented.
- e) **Legislative Decree 231/2007 and subsequent amendments** or AML Decree: Legislative Decree 21 November 2007, n. 231, implementing Directive 2005/60/EC concerning the prevention of the use of the financial system for the purpose of laundering the proceeds of criminal activities and terrorist financing as well as Directive 2006/70/EC which contains implementing measures.
- f) **Legislative Decree 24/2023** or WB Decree: Legislative Decree 10 March 2023, n. 24 containing provisions regarding the protection of people who report violations of national regulatory provisions, implementing Directive (EU) no. 2019/1937.
- g) **SNAITECH Group** or Group: the SNAITECH Group made up of SNAITECH and subsidiary companies in Italy and abroad.
- h) **ANAC guidelines**: the Guidelines on the protection of people who report violations of Union law and the protection of people who report violations of national regulatory provisions - procedures for the presentation and management of external reports approved by ANAC with Resolution no. 311 of 12 July 2023.
- i) **Model 231 or MOGC**: the organisation, management and control model of SNAITECH or the Group companies pursuant to Legislative Decree 231/2001 including the special parts and together with any annexes, as integrated or modified from time to time. All existing measures useful for containing the risks of crime can be traced back to Model 231, such as rules and procedures, controls on personnel and processes, training activities aimed at prevention, control environment.
- j) **Supervisory body** or SB: the SNAITECH Supervisory Body, equipped with autonomous powers of initiative and control in compliance with Legislative Decree 231/2001, established in accordance with the provisions of the "Confindustria Guidelines" for the preparation of the MOGC, as well as the person responsible for managing internal reports pursuant to the WB Decree; for the purposes of this Policy the SB assumes the role of Whistleblowing Committee.

- k) **Procedures:** the term procedures must be understood in a broad sense to include all the operational procedures, policies, manuals, regulations, guidelines and operational instructions in force within the Company, referred to in Model 231 and the Anti-Corruption Policy or placed in monitoring the commission of the offenses indicated in points i) and ii) of the definition of "Report" below.
- l) **Whistleblowing Representative** or Representative: is a member of the Whistleblowing Committee that maintains communication with the whistleblowers and operates, in all phases of management of the report, in agreement with the remaining members of the Committee.
- m) **Report:** a detailed communication based on precise and consistent factual elements concerning:
- i. the commission, attempted commission or reasonable risk of commission of one of the relevant crimes and/or offenses pursuant to the WB Decree;
  - ii. the commission, attempted commission or reasonable risk of commission of one of the relevant crimes and/or offenses pursuant to Legislative Decree 231/2001, such as, by way of example, corruption;
  - iii. the violation, attempted violation or reasonable danger of violation of: Model 231, Anti-Corruption Policy as well as the Procedures (as defined in this Policy);
  - iv. any irregular or anomalous conduct or event, symptomatic of "bad administration" and/or which may entail risks for SNAITECH and/or the Group or the companies that are part of it, of which the Whistleblowers have become aware due to the functions performed .
- n) **Internal reporting:** the Report made to the Whistleblowing Committee.
- o) **External reporting:** the Report made to the National Anti-Corruption Authority (ANAC) through the channel established by the same.
- p) **Reporting in "bad faith":** a report which, from the outcome of the investigation phase, appears to be unfounded on the basis of objective elements and which shows the proven bad faith of the person making the report, made with the aim of causing unfair damage to the person and/or company reported.
- q) **Reporters:** those who make the Report.
- r) **Reported:** those who are the subject of a Report.
- s) **SNAITECH** o Company: SNAITECH S.p.A.

## 2. APPLICABLE RULES AND PROCEDURES

- Directive (EU) no. 2019/1937 – Directive on the protection of persons reporting breaches of Union law.
- Legislative Decree 10 March 2023, n. 24 containing provisions regarding the protection of people who report violations of national regulatory provisions, implementing Directive (EU) no. 2019/1937 (WB Decree).
- Opinion of the Guarantor for the protection of personal data on the draft legislative decree implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, concerning the protection of persons who report violations of Union law (so-called Whistleblowing Directive) - 11 January 2023.
- Guidelines on the protection of people who report violations of Union law and protection of people who report violations of national regulatory provisions - procedures for the submission and management of external reports approved by ANAC with Resolution no. 311 of 12 July 2023.
- Legislative Decree no. 231/2001 - Administrative responsibility of companies and bodies (Decree 231).
- Legislative Decree no. 196/2003 - Personal data protection code amended by Legislative Decree 101 of 2018.
- Regulation (EU) no. 2016/679 - General Data Protection Regulation (or GDPR, General Data Protection Regulation).
- Applicable National Collective Labor Agreements.
- Penal Code.

### INTERNAL REGULATIONS

- Model 231.
- Anti-Corruption Policy.
- Confindustria Guidelines for the construction of Organization, Management and Control Models pursuant to Legislative Decree 231/2001 (June 2021).
- Confindustria's Whistleblowing operational guide for private entities (October 2023)
- Privacy Organizational Model (POM).
- Procedures (as defined in this Policy).

## 3. PURPOSE AND OBJECT

### 3.1 PURPOSE

The purpose of the Whistleblowing system is to allow SNAITECH to become aware of situations of risk or damage and to deal with the reported problem as promptly as possible. The Whistleblowing system therefore contributes to identifying and combating corruption or other forms of illicit activity, to protecting SNAITECH from economic and image damage, to spreading the culture of ethics, legality and transparency and to strengthening the control system internal and risk management.

The Whistleblowing system therefore constitutes a tool through which Whistleblowers can communicate to the Committee an illicit or anomalous conduct or one of the relevant offenses pursuant to the WB Decree, Decree 231, Model 231 and/or the Procedures, committed by subjects belonging to or connected to SNAITECH (employees, but also self-employed workers, freelancers, consultants, volunteers, trainees, administrators and supervisory bodies).

This document, in summary:

- identifies the subjects who can make Reports;
- limits the scope of conduct, events or actions that may be the subject of a Report;
- identifies and prescribes the general principles and rules that govern the Reporting process, including the protection of the Reporter and the Reported Party.

### 3.2 WHAT IS A REPORT

SNAITECH provides the possibility of making reports with the aim of preventing and effectively combating fraudulent behaviour, illicit or irregular conduct, violations and to support the effective application and operation of Model 231, the Anti-Corruption Policy and the Procedures. Violations, attempted violations or circumstances that involve a reasonable risk of violations may be reported, both when said violations are in the interest or to the benefit of the Company and when they are contrary to such interest or to its disadvantage.

### 3.3 PURPOSE OF THE REPORT

The reporter can make reports regarding:

- Violations of the Company's Organization, Management and Control Model;

- Violations of Legislative Decree 231/2001 and subsequent amendments;
- Violations of the provisions of Legislative Decree no. 24/2023 (WB Decree);
- Reports of acts or omissions that harm the financial interests of the European Union referred to in art. 325 of the Treaty on the Functioning of the European Union;
- Acts or omissions relating to the internal market (referred to in Article 26(2) of the Treaty on the Functioning of the European Union), including infringements of European Union rules on competition and State aid as well as infringements relating to the internal market relating to acts which infringe corporate tax rules or mechanisms the purpose of which is to obtain a tax advantage which defeats the object or purpose of the applicable corporate tax law;
- Offenses falling within the scope of application of European Union or national acts relating to the following sectors:
  - public procurement;
  - financial services, products and markets;
  - prevention of money laundering and terrorist financing;
  - product safety and compliance;
  - transport safety;
  - environmental protection;
  - radiation protection and nuclear safety;
  - food safety and animal health and welfare;
  - public health;
  - consumer protection;
  - protection of private life and protection of personal data (to be understood as a violation of the legislation on privacy);
  - security of networks and information systems.

Reports may also concern well-founded suspicions or events that have not yet occurred which the whistleblower reasonably believes could lead to a violation.

Reports based on "rumors", grievances, requests, claims, grievances or requests of a personal nature of the Reporter are excluded. If such reports are nevertheless received, they will be archived by the Committee, following communication to the Reporter of their lack of relevance to the regulatory provisions.

In summary, it is necessary that:

- the Report is detailed and is based on precise and consistent factual elements such as to suggest that there is the possibility that an event relevant to the Report has occurred;
- the Reporter has reasonable reasons, in light of the circumstances and the information available to him at the time of the Report, to believe that the facts reported are true or has direct or in any case sufficient knowledge of such facts, due to the functions performed.

The Report must be made in good faith and must not take on an abusive tone or contain personal insults or moral judgments aimed at offending or damaging the honor and/or personal and/or professional decorum of the person or persons to whom the facts reported are defendants.

In particular, it is prohibited to make reports in "bad faith" and more specifically:

- the forwarding of Reports for purely defamatory or slanderous purposes;
- the forwarding of Reports that relate exclusively to aspects of private life, without any direct or indirect connection with the corporate activity of the Reported Party;
- the forwarding of reports of a discriminatory nature, as they refer to sexual, religious and political orientations or to the racial or ethnic origin of the reported subject;
- submitting reports in violation of the law.

Reports made in "bad faith", abusive, offensive, defamatory, slanderous and discriminatory may give rise to civil and/or criminal liability against the Reporter and the application of sanctions as indicated below.

Furthermore, the Whistleblowing Committee is not required to take into consideration "bad faith" reports and unsubstantiated anonymous reports, as well as those not falling within the scope established by the legislation and this Policy, or those not supported by elements suitable for highlighting facts and situations linked to specific contexts. These reports will be archived by the Committee, following communication to the Reporter of their lack of relevance to the regulatory provisions.

The reports referred to in art. 48, paragraph 1, of Legislative Decree 231 of 2007 are not governed by this Policy: the specific section of the IT channel referring to them, in accordance with current legislation, is available only to employees and people in comparable positions. For the management of these types of reports, please refer to the provisions of the internal procedures regarding the management of offenses and irregularities pursuant to art. 48 of Legislative Decree 231/2007.



## 4. SUBJECTS INVOLVED

This document applies to SNAITECH.

The main subjects involved in the execution of this Policy are the following.

### 4.1 REPORTERS

Reporters, as identified in the WB Decree, can be (i) internal subjects, which include, in addition to the Company's employees, also:

- subjects with administrative, management, control, supervisory or representation functions, even if these functions are exercised merely *de facto*;
- subjects whose employment relationship has not yet started in cases where information regarding a violation was acquired during the selection process or other stages of pre-contractual negotiations;
- any volunteers;
- interns.

and (ii) external parties, including, by way of example and not limited to:

- consultants, brokers, business partners, intermediaries;
- any person working under the supervision and direction of contractors and subcontractors;
- workers or collaborators who carry out their work for subjects who supply goods or services or who carry out works for the benefit of the company;
- former employees;
- customers or users of SNAITECH services limited to violations found in the company's work environment.

Reporters can also be people who were or will be in the future in one of the positions illustrated above.

### 4.2 REPORTS AND MANAGEMENT OF ANY POSSIBLE CONFLICT OF INTEREST

The Reports may concern members of corporate bodies or bodies, management, employees, external collaborators, non-subordinate collaborators of the Company, as well as commercial partners, consultants, intermediaries and all those who maintain relationships with SNAITECH and are referable to any type of illicit or irregular conduct of which one has become aware due to the functions performed.

The management of the Report must be entrusted exclusively to subjects who are not in situations of conflict of interest. Therefore, if the Report refers to one or more members of the Committee, they will abstain from managing the report which will be handled by the remaining members unrelated to the conflict situation.

#### **4.3 RECIPIENTS OF INTERNAL REPORTS**

The Committee receives and manages internal reports.

The Whistleblowing Representative, following receipt of the report, will send one communication of "taking charge" to be sent to the reporting party, highlighting it to the other members of the Whistleblowing Committee.

If the Reporter turns to a third party, other than the Committee, the latter has the duty:

- to suggest that he contact the Committee;
- alternatively, to direct him to use the IT channel established for this purpose.

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## 5. MINIMUM CONTENTS AND REPORTING METHODS

### 5.1 MINIMUM CONTENTS

In order to allow profitable use of the Report, it should contain all the elements useful for ascertaining the validity of the facts covered by the communication and, in particular, have the following essential elements:

- **object:** a clear and complete description of the facts covered by the Report, with indication (if known) of the circumstances of time and place in which the reported facts were committed or omitted (by way of example only: contract, transaction, place);
- **Reported subject and other subjects involved:** any element (such as the company management/function/role) that allows easy identification of the alleged perpetrator(s) of the reported behavior and of other subjects potentially aware of the reported facts;
- **company involved:** SNAITECH and other Group companies possibly involved in the Report together with SNAITECH. Reports that exclusively concern other Group companies must be carried out and managed in compliance with the Policy/procedure adopted by the respective companies.

Furthermore, the Reporter may indicate the following additional elements:

- your personal details (by way of example but not limited to, name - surname), in the event that you do not intend to make use of the option of anonymity;
- the indication of any documents that can confirm the validity of the facts reported;
- the type of relationship maintained with the company;
- any other information that may facilitate the collection of evidence on what has been reported;
- the indication of any other subjects who can report on the facts covered by the Report;
- any indications on a previous Report regarding the same violation and any feedback received;
- any other information that may facilitate the collection of evidence on what has been reported.

### 5.2 REPORTING METHODS

Reports can be made via the IT channel described below or, alternatively, with a meeting in person with the Committee (or with one of its members) who will take charge of the management, in line with the provisions of this Policy. The reporting methods and, more generally, the regulations on Whistleblowing, are the subject of specific training courses periodically organized and aimed at SNAITECH employees.

The preferential channel for sending reports is the IT one as it guarantees maximum confidentiality and effective management of the same.

#### IT channel – preferential channel

For the transmission of reports in written form or via voice messaging, with voice encryption, SNAITECH has established a Whistleblowing IT channel, compliant with the ANAC Guidelines and

the indications of the Privacy Guarantor, which ensures the confidentiality of the identity of the Reporter, offering also the possibility of making reports anonymously according to the methods better described below in detail and in the Reporting Operational Manual.

The application is accessible to staff and external parties via the specific "Governance – Whistleblowing" section - on the SNAITECH institutional website ([www.snaitech.it](http://www.snaitech.it)).

Specific information about the establishment of this channel was given to employees both through specific awareness communications and through the company intranet, regarding the discipline and reporting methods.

The Reporter accesses the application anonymously without prior registration. The platform allows the Reporter to transmit the report in total anonymity or to provide his/her personal details (the confidentiality of the information transmitted in accordance with the WB Decree is in any case ensured).

Each report is associated with a unique code (ticket) - to be kept with extreme diligence - which allows the Reporter to consult the status of the same and/or check whether there are messages and requests for clarification from the Whistleblowing Representative.

The application, in order to allow for in-depth analysis of the facts reported, allows the establishment of a "dialogue" as well as the possible sending of electronic documents as attachments, all always in confidential form, between the Reporter and the Whistleblowing Representative.

The system guarantees information to the Reporter regarding the outcome of the sending of the Report, the relative "taking charge", the possibility of being contacted again to acquire useful elements for the investigation phase, the possibility of sending further information which will eventually be knowledge for the purposes of integrating the facts being reported.

The application is also used to notify the Reporter of the closure of the checks.

The information collected is stored in electronic format on the platform, equipped with defined access profiles only for management personnel who are subject to mandatory authentication and automatic tracking of the operations carried out.

The platform also performs the database function of the Reports received, reporting the essential data.

### **"Oral" reporting via personal meeting**

As an alternative to the reporting channel mentioned above, the Reporter may also request a meeting in person from one of the members of the Committee or from the Committee itself; in this case, with the consent of the Reporter, we proceed as follows:

1. the Report is documented by contextual insertion of the same on the IT Channel by the Whistleblowing Representative;
2. the Reporter can confirm or correct the content of the report entered (as provided in the Operational Manual);

3. minutes will be drawn up during the meeting; the printed report will then be submitted to the reporting party for his signature;
4. following signature, the report must be uploaded to the IT channel and associated with the report entered; this activity is carried out by the Whistleblowing Representative;
5. The whistleblower will be able to manage the report uploaded to the IT Channel using the unique code returned by the IT platform which will be made known to him or her by the Whistleblowing Representative.

### **External Signaling Channel**

The Whistleblower may also make External Reports - only for the matters and only in the cases provided for by the WB Decree and the ANAC Guidelines - through the reporting channel activated and prepared, via a specific electronic platform, by the National Anti-Corruption Authority (ANAC) and to the one of the following conditions occurs:

- a) the Reporter has already made the Internal Report and it has not received a follow-up;
- b) the Whistleblower has reasonable grounds to believe that, if he/she made the Internal Report, it would not be followed up effectively or that the Report itself could lead to the risk of retaliation;
- c) the Reporter has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

Further details on the methods of communication, reception and management of the Reports, transmitted through the external reporting channel, are available in the specific section on the ANAC website.

### **Public disclosure and complaint to the judicial authorities**

In this regard, it is noted that the WB Decree introduces a further reporting method consisting of public disclosure:

- 1) an internal report to which the Company did not respond within the established deadlines was followed by an external report to ANAC which, in turn, did not provide feedback to the reporter within a reasonable time;
- 2) the person has already directly made an external report to ANAC which, however, has not given feedback to the Reporter regarding the measures envisaged or adopted to follow up on the report within a reasonable time;
- 3) the person directly makes a public disclosure because he or she has reasonable grounds to believe, reasonably, on the basis of concrete circumstances and therefore, not on simple inferences, that the violation may represent an imminent or obvious danger to the public interest;
- 4) the person makes a public disclosure directly because he or she has reasonable grounds to believe that the external report may involve a risk of retaliation or may not be followed up effectively.

The WB Decree also recognizes that individuals entitled to make reports have the possibility of contacting the competent judicial authorities to forward a report of illicit conduct of which they have become aware in the work context.

## 6. INTERNAL REPORTING PROCESS

SNAITECH guarantees systematic, accurate, transparent, impartial, objective and timely management of reports, also guaranteeing the traceability of the entire process.

The Whistleblowing process is based on the principles of trust, impartiality and protection of the Whistleblower and consists of the following phases:

- a) reception and evaluation of the Report;
- b) management of the Report;
- c) definition of the Report and conclusion of the case.

The management of reports, in all its phases, is carried out in compliance with the WB Decree and this Policy and is divided into the phases described below.

### 6.1 RECEIPT AND EVALUATION OF REPORTS

Upon receipt of the Report, the Whistleblowing Representative carries out, in summary, the following activities:

- takes charge of the Report;
- sends the Reporter a confirmation of receipt of the Report within seven working days of receiving it;
- initiates, also making use of the skills of the Whistleblowing Committee, the preliminary verification of the existence of the necessary conditions for the evaluation of the Report on the basis of what is reported therein and of any initial information elements already available, for example, evaluating (i) whether the Reporting has the purpose of drawing attention to behavior that places the Company and/or third parties at risk and not a mere complaint of a personal nature; (ii) the severity of the risk for the Company and/or third parties, including reputational, financial, environmental and human damage; (iii) if the Report contains sufficient evidential elements or if, on the contrary, it is too generic and lacks the necessary elements for a subsequent investigation, proceeding, if not, to further investigations and to request the necessary clarifications from the Reporter.

During this phase, the Committee guarantees the confidentiality of the information contained in the report (for example data of the whistleblower/reported person): the prohibition on revealing the identity of the whistleblower refers not only to the name of the whistleblower but also to all the elements of the report, from which the identification of the person making the report can be obtained, even indirectly.

The identity of the reporting person and any other information from which such identity can be deduced, directly or indirectly, cannot be revealed, without the express consent of the reporting person, to people other than those competent to receive or follow up on the reports.

## **6.2 MANAGEMENT OF REPORTS**

The Whistleblowing Committee, following the activities carried out by the Whistleblowing Representative, analyzes the report and carries out a complete investigation, promoting the related checks and investigations, in order to evaluate the relevance and validity of the Report.

The internal investigation activity is conducted in a confidential, accurate and impartial manner, with a view to preserving the confidentiality of the Reporter.

To carry out the aforementioned activities, the Committee may (i) request further information and/or documentation from the Reporter; (ii) acquire information and documents from the competent Company Departments/Functions/Areas<sup>1</sup>; (iii) make use of the support of external professionals, also in order to guarantee the contribution of specialist skills and ensure impartiality and independence in the relevant assessments. Relations with the Whistleblower are conducted by the Whistleblowing Representative.

The investigations must not interfere, directly or indirectly, with a judicial investigation, instead it is appropriate to offer collaboration to the prosecuting authority.

The Committee, through the Whistleblowing Representative, sends the Whistleblower appropriate updates on the activities carried out (communication of acceptance within seven days and closure within three months. If the closure of the same requires more in-depth investigations to be carried out in more time long, the Reporter will be given feedback regarding this need within three months).

## **6.3 DEFINITION OF THE REPORT AND CONCLUSION OF THE CASE**

The Whistleblowing Representative, following the appropriate checks and investigations conducted by the Committee, archives the Reports in "bad faith", not sufficiently detailed or unfounded (reports not inherent to the WB Decree and/or non-verifiable reports), as well as those containing facts which have already been the subject of investigations in the past, unless the Report contains new elements such as to make further verification activities appropriate.

In relation to well-founded reports (since they are verifiable and detailed), the Whistleblowing Committee formulates the recommendations deemed appropriate, without prejudice to the decision regarding the possible adoption of disciplinary measures by the competent structures.

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<sup>1</sup>It is specified that all the Departments/Functions/Areas involved must guarantee absolute confidentiality regarding the reporting person and the person reported during the carrying out of the verification activities, as well as on the subject of the report.

At the conclusion of the investigations and the aforementioned activities, the Whistleblowing Committee, through the Representative, informs the Whistleblower of the outcome or status of the same.

The indicative maximum deadline for the conclusion of the procedure is set at three months, without prejudice to any extensions of the deadlines justified by the specific circumstances of the case and, in particular, by the nature and complexity of the subject of the Report (for example, in the case of long investigations ).

#### **6.4 SANCTIONAL OR LEGAL MEASURES**

SNAITECH reserves the right to take appropriate disciplinary and/or sanctioning and/or legal actions in order to protect its personnel, its rights, its image, against any person who has made reports in bad faith, unfounded and for the purpose to slander, defame or cause harm to the person reported or to other subjects mentioned in the report. SNAITECH, therefore, reserves the right to take appropriate action against anyone who carries out, or threatens to carry out, acts of retaliation against subjects who have sent reports in accordance with this Policy.

In particular, if the outcome of the checks carried out shows the validity of the report, the Whistleblowing Committee reports to the Board of Directors so that the latter can evaluate any appropriate action to be taken, including, if necessary, involving the Human Resources and Organization Management.

Even in this phase, the corporate bodies/management must ensure absolute confidentiality regarding the identity of the reporting party and the person reported as well as the subject of the report.

In the event that the report concerns a member of the Board of Directors, the Committee forwards the outcome of its investigations to the President of the Board of Directors.

However, if the report concerns the entire Board of Directors or its President, the Committee forwards the outcome of its checks to the Board of Statutory Auditors.

In the same way, the Committee ensures that, by transmitting an adequate report to the Human Resources and Organization Management and for information to the CEO, where it ascertains that the report, revealed to be unfounded following the outcome of the checks, appears to be characterized by willful misconduct or gross negligence, the Committee shall evaluate the most suitable disciplinary measures to be taken against the whistleblower, in compliance with the provisions of the applicable National Collective Labor Agreement and the relevant legislation.

As part of the disciplinary proceedings:

- the identity of the reporting person cannot be revealed in the event that the dispute of the disciplinary charge is based on investigations that are distinct and additional to the report, even if consequent thereto;



- if the dispute is based, in whole or in part, on the report and knowledge of the identity of the reporting person is indispensable for the defense of the accused, the report will be usable for the purposes of disciplinary proceedings only in the presence of the express consent of the reporting person to the revelation of one's identity.

The Whistleblowing Decree provides for administrative sanctions, which can be imposed by the ANAC in the event of violation of the rules on reporting of offenses and irregularities: in fact, abuses of the reporting system by Whistleblowers who use the tool in order to slander or defame a other subject.

The Decree also provides for possible sanctions that ANAC may impose on the Company regarding (i) any retaliation perpetrated against the reporting subjects, (ii) violations of the obligation of confidentiality, (iii) boycott of a reporting attempt, (iv) failure to take in charge of a report or (v) insufficient investigative activity initiated following the same.

The following individuals are subject to disciplinary sanctions:

- the Reporter who carries out with malice or gross negligence
- Reports that prove to be unfounded or "in bad faith";
- the corporate entity that has adopted discriminatory or retaliatory measures against the Whistleblower or persons treated as equivalent to him pursuant to the WB Decree;
- subjects who obstruct or attempt to obstruct the Reports;
- the person responsible for verification activities in the event of failure to carry out the verification and analysis activities of the reports governed by the WB Decree and by this Policy;
- subjects who do not guarantee the general principles of protection with particular reference to respecting the confidentiality of the identity of the Reporter;
- the Reported Person who, following the results of the checks conducted by SNAITECH, was found to have carried out illicit or irregular acts, or activities not in compliance with Model 231, or with the system of Procedures, also in accordance with the provisions of the company disciplinary system envisaged by the collective labor agreement.

Finally, if as a result of the checks carried out following the Report, fundamental elements have been identified regarding the commission of an illicit act, the Company may submit a complaint to the judicial authority and make use of the other remedies and measures provided for by law (dismissal, termination contractual, penalties, etc.). Likewise, if the results of the checks carried out have highlighted illicit behavior on the part of a third party (for example a supplier), the Company may proceed, without prejudice to any further right provided for by law and contract, to suspend/terminate the contractual relationships.

## **6.5 TRACEABILITY AND STORAGE**

The documentation relating to each Report received (i.e. all information and supporting documents) is kept, in compliance with confidentiality requirements, for the time necessary to carry out the management activities of the Reports received and, in any case, within the deadlines maximums established by the legislation currently applicable on Whistleblowing and in compliance with the provisions of GDPR 679/2016.

For further information on the retention times of the documentation produced when receiving and managing reports, please refer to the information relating to the processing of personal data ex. articles 13 and 14 GDPR 679/2016 available both on the corporate website and on the IT channel.

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## 7. PROTECTION OF THE REPORTER AND OTHER INTERESTED PERSONS

SNAITECH intends to strengthen the relationship of trust between the Company and its stakeholders. For this reason, it protects the Reporting Subject and other interested persons against any retaliatory, harmful, discriminatory or otherwise unfair conduct, threatened or actual, direct or indirect, resulting from the Report and implemented during the entire Whistleblowing process and following its conclusion. of the same. The Report cannot constitute a prejudice to the continuation of the employment relationship.

In order to avoid "transversal" retaliatory conduct, protection measures are recognized in relation to the following subjects:

- (i)* facilitators, i.e. those who assist the Reporter in the reporting process and whose assistance must be confidential;
- (ii)* third parties connected to the Reporters (e.g. colleagues or family members);
- (iii)* legal entities connected to the Reporting Party or to the entities referred to under (i) or (ii).

Furthermore, protection measures apply when:

- 1) at the time of the Report or complaint to the Judicial Authority or Public Disclosure, the Reporter has reasonable grounds to believe that the information on the reported violations is true and falls within the objective scope of this Policy;
- 2) an External Report or Public Disclosure has been made, for the matters and in the cases provided for by the WB Decree and under the following conditions:
  - a) the Reporter has previously made a Report in accordance with the law and has not received any feedback;
  - b) the Reporter has reasonable grounds to believe that the violation may constitute an imminent and/or obvious danger to the public interest;

the Reporter has reasonable grounds to believe that the Report may involve the risk of retaliation and/or may not be effectively followed up due to the specific circumstances of the specific case, such as those in which evidence may be hidden or destroyed or in which there is well-founded fear that the person who received the Report may be colluding with the author of the violation or involved in the violation itself. The adoption of discriminatory measures against the Reporter can be reported to the ANAC, for the measures within its competence.

Even if the facts reported prove to be unfounded and/or inconsistent, based on the assessments and investigations carried out, the Reporter who has made the Report in good faith will not be prosecuted.

## 8. PROTECTION OF THE REPORTED

In order to prevent any abuse of Whistleblowing and to prevent denunciations, defamation, discrimination, retaliation or other disadvantages and/or the disclosure of sensitive personal data of the Reported Party, which could imply damage to his reputation, pending verification of his responsibility this person cannot be disciplinary sanctioned in any way on the basis of what is stated in the Report, without there being objective confirmation and without the facts covered by the Report having been investigated.

Without prejudice to the obligation of confidentiality of the identity of the Reporter, in the Internal and External Reporting procedures, the Reported Person may be heard, or, upon request, is heard, also through a paper procedure through the acquisition of written observations and documents.

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## 9. CONFIDENTIALITY AND PRIVACY

In the case of nominative Reports (where the identity of the Reporter and any other useful information that can allow identification are known by the recipient of the Report, but such information is not revealed), SNAITECH guarantees the confidentiality of the Report and its contents and the identity of the Reporter.

The identity of the Whistleblower and of other subjects in various capacities linked to the Report is protected in all phases of the Whistleblowing process. Therefore, the above information cannot be disclosed to persons not directly involved in the evaluation or investigation process. All those who receive or are involved in the management of Reports are required to protect their confidentiality. This protection also applies to the top management bodies of the Company, who cannot order investigations or request information in order to trace the identity of the Whistleblower. Therefore, in the case of transmission of the Report to other managements, bodies or third parties for carrying out investigative activities, the Whistleblowing Committee will take care to eliminate all references from which it is possible to trace, even indirectly, the identity of the Whistleblower.

The confidentiality of the Reporter may not be respected when:

- disciplinary action has been taken based in whole or in part on the Report, knowledge of the identity of the Reporter is indispensable for the defense of the Reported Party and there is the express consent of the Reporter to the disclosure of his or her identity. In the absence of such consent, the Internal Report will not be usable for the purposes of disciplinary proceedings;
- criminal liability may be incurred for defamatory or libelous content; in this case SNAITECH reserves the right to carry out the necessary investigations against the Reporter and to adopt the measures deemed appropriate;
- anonymity cannot be enforced by law and the identity of the Reporter is necessary for the purposes of carrying out investigative activities or is requested by the Judicial Authority in relation to investigations (criminal, tax or administrative investigations, inspections of control bodies).

## 10. PROCESSING OF PERSONAL DATA

The personal data of the Reporters, the Reported Persons and all subjects involved in the Report are processed in compliance with current national and European legislation on the protection of personal data. In particular, SNAITECH and the other companies involved guarantee that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties with particular reference to data confidentiality and security.

In addition to the above, we inform you that:

- the privacy information ex. articles 13 and 14 is made available on the Whistleblowing IT Channel and constitutes an integral and substantial part of this Policy; the same, in compliance with the relevant regulatory provisions, contains among other things the purposes, the methods of processing of personal data, the indication of the Data Controller, the personal data processed, the subjects who may be involved in the processing, the data retention terms, as well as the rights that can be exercised with reference to your personal data;
- in compliance with the "minimization principle", only the processing of personal data strictly necessary and relevant to the purposes for which they are collected is envisaged;
- personal data that are clearly not useful for the processing of a specific report are not collected or, if collected accidentally, are deleted immediately;
- in the possible transmission of the report to unauthorized parties, if, for investigative reasons, they also need to be made aware of the content of the report and/or the documentation attached to it, it is necessary to proceed with the redaction of the personal data, especially those relating to the reporting person but also to other subjects whose identity according to Legislative Decree 24/2023 must remain confidential;
- the appropriate technical and organizational measures are implemented to guarantee the security of personal data, in compliance with current legislation, and in particular - with reference to the Whistleblowing IT Channel - the data indicated in the reporting forms are encrypted and subsequently sent to the database for storage (this allows the system greater security on the transmission channel, as well as within the servers);
- the subjects involved in the management of the Reports are designated as authorized for processing (where internal subjects) ex. art. 29 GDPR 679/2016 or as Data Processors ex. art. 28 GDPR 679/2016 (external subjects);
- pursuant to article 2-undecies of Legislative Decree no. 196/2003 and subsequent amendments. ("Privacy Code"), the rights referred to in articles. 15-22 GDPR 679/2016, cannot be exercised, that is, their exercise can be delayed or limited, if their exercise could

result in an effective and concrete prejudice to the confidentiality of the identity of the reporting party.

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11. ATTACHMENTS

N/A

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