

WHISTLEBLOWING PROCEDURE

1. INTRODUCTION AND REFERENCES

The term “Whistleblowing” refers to the instrument through which a person who has a working relationship with the company “Fami S.r.l.” (*Fami* or the **Company**), who comes into the knowledge of unlawful acts or facts at work, decides to report events they have witnessed, using channels specifically created by the Company for this purpose.

This procedure also adopts Italian Legislative Decree no. 24 of 10 March 2023, which came into force on 30 March 2023 (the **Decree**), implemented by EU Directive 2019/1937, commonly referred to as the Whistleblowing Directive (the **Directive**), which introduced current provisions on the protection of persons who report breaches of National or European legislation that harm public interest or the integrity of the public administration or private entity, which they come into the knowledge of at work.

The Decree, moreover, amended Legislative Decree No. 231 of June 8, 2001 on the so-called "Administrative Responsibility of Legal Persons" in relation to the reporting channel set up by the Entity for the emergence of violations of the Management and Organization Model (the **MOG**).

Specifically, said legislation establishes the following requirements:

- i) the creation of one or more internal channels (which may also be computerized) for the submission of specific reports that are structured in such a way as to ensure the Whistleblower's confidentiality;
- ii) the prohibition of direct or indirect retaliatory or discriminatory acts against the Whistleblower for reasons directly or indirectly linked to the report;
- iii) disciplinary sanctions for those who breach Whistleblower protection measures and those who submit unfounded reports with willful misconduct or gross negligence, the unfoundedness of which is ascertained.

This Procedure was prepared by the Company in compliance with the "Guidelines for persons reporting breaches of European Union legislation and the protection of persons who report breaches of national legislative provisions" adopted by ANAC with Resolution no. 311 of 12 July 2023, and the "Operating Guide to Whistleblowing" published by Confindustria on 27 October 2023.

This procedure is also prepared in application of Legislative Decree 231/01 as most recently amended and replaces the previous reporting channel.

2. PURPOSE

The purpose of this Procedure is to define the principles of Company conduct and methods for managing Reports in accordance with the above-mentioned regulatory provisions.

Specifically, this Procedure regulates Report reception, analysis and management, sent or submitted by anyone, also anonymously, which ensures the security and protection of Whistleblower confidentiality.

Management also includes the filing and later erasure of reports and all relative documentation.

This Procedure also aims to spread the culture of legality and transparency at the Company.

3. FIELD OF APPLICATION

The Procedure applies to **Fami S.r.l.** and companies related to it or controlled by it Fami guarantees the correct and constant application thereof, as well as maximum dissemination at the company, in compliance with confidentiality obligations and the Company's prerogative to autonomy and independence.

The Procedure also applies to adequately detailed anonymous reports, revealing facts and situations and linking them to specific contexts.

4. DEFINITIONS

CEO.: Chief Executive Officer identified by the Company to receive reports from the Manager in order to assess appropriate action

Work context: past or present work or professional activities executed and regulated by a contract between the Whistleblower and Fami, regardless of the nature thereof and through which, regardless of the nature of said activities, a person acquires information on breaches described in the report, including:

- (i) when the contract between the Whistleblower and Fami is yet to commence, if information on breaches was acquired during the selection process, or in other pre-contractual phases;
- (ii) during the trial period;
- (iii) after termination of contract, if information on breaches was acquired when said contract was in force and which may have caused the risk of retaliation if reported when the contract was still in force.

Public Disclosure: Information on breaches is made public by the Whistleblower when Public Disclosure occurs. For the Whistleblower to benefit from protective measures afforded by the Decree, Public Disclosure of breaches must comply with conditions set forth by the Legislator and specifically when:



- a. The Whistleblower has previously submitted an internal and external Report, or has directly submitted an External Report without receiving a response within the established time limits laid down for necessary measures for following up Reports;
- b. the Whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest;
- c. the Whistleblower has reasonable grounds to believe the External Report may result in the risk of retaliation or may not be effectively followed up, due to specific circumstances of the case at hand, such as when evidence may be hidden or destroyed, or when there are reasonable grounds to fear that recipients of the Report may be in collusion with the perpetrator of the breach, or involved in said breach.

Facilitator: natural person who assists the reporting person in the reporting process in a Work Context and whose assistance must be confidential.

Report Dossier: summary document of verifications conducted on the Report/s containing a summary of investigations into Reported matters, the outcome of conducted investigations and any identified action plans.

GDPR: (EU) Regulation 2016/679 regarding the protection of the personal data of natural persons and the free circulation of such data.

Brochure: the document, published on the intranet and internet website of the Company and posted at the premises and operative sites of subsidiary companies, which provides a short guide on how to submit a Report and the list of report reception channels.

	The business management system	
PG 29	The Management of Reports - Whistleblowing	Pagina 3 di 11

SB: Supervisory Body referred to in Article 6 of Legislative Decree no. 231 of 2001, appointed by the Company with a formal resolution.

Whistleblower and/or Reporter and/or Reporting Person: indicate:

- (i) Fami personnel, a category including everyone who has a work contract with the Company of any type and level, including, by way of example but not limited to; employees (permanent or fixed term, part-time or full-time, through staffing or job-on-call agreements), Executives, Executive Managers, Employees, Workers, non-employed staff, volunteers, interns, apprentices, remunerated or not;
- (ii) independent contractors, freelancers, consultants, suppliers, agents and customers, irrespective of the type of contract or engagement;
- (iii) shareholders and holders of administrative, directive, control, supervisory or representative functions in the company, even if exercised in mere fact.

The Whistleblower must be a witness of an offence or irregularity referable to the Company and come into the knowledge of it in a Work Context.

Reported Person: the person to whom the Report refers.

Segnalazione Interna: any communication received by FAMI relating to the Internal Control and Risk Management System and concerning conduct referable to FAMI Parties carried out in violation of the Code of Ethics, laws, regulations, provisions of the Authorities, internal regulations, MOG, however likely to cause damage or prejudice, even if only of image, to Fami.

In particular, communications relating to non-compliance with external laws and regulations, principles contained in the Code of Ethics and rules provided for in the internal regulatory system of Fami, including those concerning:

- (i) unlawful conduct pursuant to Legislative Decree no. 231 of 2001 and/or violations of a malicious or fraudulent nature of Model 231;
- (ii) unlawful acts that fall within the scope of application of the European Union or national acts indicated in the annex to Legislative Decree no. 24/2023, or national acts implementing the acts of the European Union set out in the Annex to Directive (EU) 2019/1937, related to the following areas: public procurement, services, products and financial markets and prevention of money laundering and terrorist financing, product safety and compliance, transport safety, environmental protection, radiation protection and nuclear safety, food and feed safety and animal health and welfare, public health, consumer protection, privacy and personal data protection and security of network and information systems;
- (iii) injury to the financial interests of the Union as referred to in article 325 of the TFEU;
- (iv) infringement of the internal market as referred to in article 26(2) of the TFEU including competition and State aid infringements, as well as internal market infringements related to acts infringing corporate tax rules or arrangements the purpose of which is to obtain a tax advantage which defeats the object or purpose of the applicable corporate tax law;
- (v) acts or conduct that frustrate the object or purpose of the provisions of the European Union in the areas indicated in the preceding paragraphs.

Therefore, those other than the cases described above are not treated as Reports for the purposes of this Procedure and, in particular:

- a) those referring to requests, claims or complaints relating to commercial activities (e.g. disputes for incorrect or defective supplies, etc.) and those purely personal relating to one's employment relationship;
- b) the reports that are already mandatorily regulated by the European Union or national acts indicated in Part II of the Annex to the Decree, or by national acts that constitute implementation of the European Union acts indicated in Part II of the Annex to the Directive although not indicated in Part II of the Decree (e.g., Market Abuse as per EU Reg. 596/2014, TUB or TUF);
- c) the reports of violations relating to national security, as well as procurement relating to defense or national security aspects, unless such aspects are covered by relevant secondary legislation of the European Union.

Any reports involving facts referred to in (a), (b) and (c) above will be forwarded to the corporate functions competent to receive and process them based on the relevant regulations.

Anonymous reporting: A report in which the Whistleblower's personal information is not disclosed or univocally identifiable.



Detailed Report: A report containing assertions (for example, reference period, place, value, causes and purposes, elements enabling the identification of the perpetrator of reported acts, anomalies regarding the internal control system, supporting documentation, etc.) and that is characterized by a sufficient level of detail, at least in abstract terms, so as to enable the identification of precise and concordant facts and situations, with reference to specific contexts, and which enable the identification of elements useful for the purposes of ascertaining the truthfulness of the Report.

External Report: the external reporting channel activated and managed by ANAC (Italian National Anti-Corruption Authority), in compliance with the principle of confidentiality. Reporting procedures are indicated in the "Guidelines for persons reporting breaches of European Union legislation and the protection of persons who report breaches of national legislative provisions". Procedures for presenting and managing external reports are available on the ANAC website (<https://www.anticorruzione.it/-/del.311.2023.linee.guida.whistleblowing>).

Whistleblowers can only use the ANAC reporting channel when:

- a. the mandatory opening of an internal reporting channel does not apply to the work context, or is not active despite being mandatory, or is available but not compliant with legislation;
- b. the Whistleblower has already submitted an internal report, which was not followed up. Reference is made to cases in which the internal channel was used but the Manager has failed to undertake any activities in order to ascertain the admissibility of the Report, reported facts or notify the outcome of conducted investigations, within the time frame established by the Decree;
- c. the Whistleblower has reasonable grounds to believe that if they were to submit an internal report, it would not be effectively followed up and may result in the risk of retaliation;
- d. the Reporting Person has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to public interest. Reference is made, for example, to the case in which the breach evidently requires urgent intervention from a public authority in order to safeguard public interest, for example health, security, or environmental protection.

Unlawful reports: A report submitted with willful misconduct or gross negligence by the Whistleblower, which is found to be devoid of a factual basis during the investigation phase, and submitted in full awareness of the fact that no breach

	The business management system	
PG 29	The Management of Reports - Whistleblowing	Pagina 5 di 11

or non-conformity has taken place, or that the reported person is not implicated, or with gross negligence in the assessment of factual elements.

Third Parties: any other third parties who are not definable as the Whistleblower and/or Reported Person.

5. MANAGER OF THE REPORT

The **Manager** is the collective body which the Company Fami S.r.l., in compliance with provisions of the Decree, has appointed for the purpose of managing internal Reporting Channels, and the management of report reception, analysis and assessment.

Fami has designated the Chairman of the Supervisory Board as the Manager of the internal reporting channel.

6. GENERAL PRINCIPLES

6.1. Independence and professionalism of the identified person in the management of reports.

The Manager operates ensuring the necessary conditions of independence and objectivity, competence and professional diligence, as set forth in the international standards for the professional practice of Internal Auditing, and in the Code of Ethics.

6.2. Prevention of Conflict of interests.

Any members of the Manager's collective body in a position of conflict of interests with reference to submitted reports (as the Reported Person or Whistleblower) shall refrain from managing the Report.

In any case, any sanction measures adopted by the Company as a result of the Manager's report cannot ever be issued by the person involved in investigation activities regarding the Report or preparation of the Report, however they shall be readmitted upon the General Manager's assessment and decision.

6.3. Guarantee of confidentiality and anonymity

The Manager and in general all persons of Fami who erroneously receive an Internal Report and/or who are involved in any way in inquiries and the processing thereof, (for example, the Facilitator and persons interviewed in the investigation phase), are required to maintain the utmost confidentiality of reported persons and matters, using to this effect communication criteria and processes suitable for safeguarding the identity and integrity of persons mentioned in Internal reports, and the anonymity of the identification data of Whistleblowers (the "principle of whistleblower confidentiality"), without ever disclosing acquired data to persons not involved in the inquiry and handling of Reports regulated by this Procedure.

Confidentiality of the content and the Whistleblower's identity are guaranteed in the management of reports, except for in the following cases:

- o penal liability is confirmed for the offences of libel and slander, including first instance rulings, or for offences committed with the Report, or civil liability, to the same effect and for the same reasons, in cases of willful misconduct or gross negligence;
- o requests from Judicial Authorities or other entitled entities.

Disclosure of information on the Whistleblower's identity or information which enables the direct or indirect identification of said person without the Whistleblower's explicit consent, by persons other than those duly entrusted with the reception or follow-up of Reports, explicitly authorized to process such data pursuant to Privacy regulations, is forbidden.

6.4. Prohibition of retaliatory or discriminatory acts against the Whistleblower.

The adoption of direct or indirect retaliatory or discriminatory acts against the Whistleblower by all Fami personnel, for reasons directly or indirectly linked to the Report, is strictly prohibited.

The protection afforded to the Whistleblower also extends to: (i) Facilitators; (ii) Third Parties connected to Reporting Persons and who may be at risk of retaliation in a Work Context, such as colleagues or relatives of reporting persons; and (iii) legal entities, which Reporting persons own, work for, or are otherwise connected to in a Work Context.

Retaliatory or discriminatory dismissal of the Reporting Person is null and void. Change of duties pursuant to Art. 2103 of the Civil Code, as well as any other retaliatory or discriminatory measure as indicated in art. 17 of the Decree and described here below, are also null and void:



- a) dismissal, suspension or equivalent measures;
- b) demotion or non-promotion;
- c) change of duties, change of workplace, reduction of salary, change of working hours;
- d) suspension of training or any restriction of access to it;
- e) negative merit notes or negative references;
- f) the adoption of disciplinary measures or other sanctions, including fines;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavorable treatment;
- i) the failure to convert a fixed-term employment contract into a permanent employment contract, where the employee had a legitimate expectation of such conversion;
- j) non-renewal or early termination of a fixed-term employment contract;
- k) damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- l) inclusion in improper lists on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- m) early termination or cancellation of the contract for the supply of goods or services;
- n) cancellation of a license or permit;
- o) the request to undergo psychiatric or medical examinations.

The adoption of discriminatory measures against Whistleblowers can be reported to ANAC pursuant to art. 19 of the Decree, which will inform the national labor inspectorate, so that relevant measures are taken.

the Whistleblower can also refer to entities as per art. 18 of the Decree, for the purpose of receiving protection from retaliation.

Any employee who believes they have been a victim of any above-mentioned types of conduct as a result of a Report can notify the Human Resources Department or the Supervisory Board. The above-mentioned Offices will undertake any disciplinary action against the perpetrators of discriminatory or retaliatory conduct.

For the consequences related to the possible adoption of retaliatory and/or discriminatory acts, direct or indirect, carried out against the Whistleblower for reasons related, even indirectly, to the Report, and for the discipline of the sanctions that can be adopted against those who violate the measures for the protection of the Whistleblower or those who make with malice or gross negligence reports that turn out to be unfounded, please refer to the specific discipline contained in

	The business management system	
PG 29	The Management of Reports - Whistleblowing	Pagina 7 di 11

the "Disciplinary and Sanctioning System ex D.lgs 231/2001" adopted by the Company at the time of the adoption of the MOG, in its current version.

6.5. Protection of Reports submitted with willful misconduct or gross negligence

In order to protect the image and reputation of unfairly reported persons, in the event of unlawful Reports submitted with willful misconduct or gross negligence, Fami will also ensure the adoption of disciplinary sanctions against the Whistleblower.

Fami will also inform persons/ companies reported in unlawful Reports, of the content of unlawful Reports and the Whistleblower's identity, to enable said persons/ companies to assess undertaking any protective action.

6.6. Sanctions for breaches of Whistleblower protection

In the case of violations of the measures for the protection of the Whistleblower, sanctions will be applied as provided for in the Disciplinary and Sanctioning System ex D.lgs 231/2001" adopted by the Company at the time of the adoption of the OMC, in its current version, to which express reference is made.

In the case of violations committed by the Administrative Body, the disciplinary sanction will be disbursed by the Shareholders' Meeting.

Moreover, pursuant to art. 21 of the Decree, ANAC may issue the Company with an administrative fine from 10,000 to 50,000 euros in cases in which it ascertains a breach to prescriptions contained in the Decree and transposed in this Procedure.

Once more pursuant to art. 21 of the Decree, ANAC may issue the Whistleblower with an administrative fine from 500 to 2,500 euros upon ascertaining, including in a first instance decision, the Whistleblower's civil liability for libel or slander in cases of willful misconduct or gross negligence, unless said person has already been convicted, even if only in a first instance decision, for the same offences committed, as a consequence of being reported to judicial authorities.

7. INTERNAL REPORTING PROCEDURES

7.1. The sending of Reports

A Whistleblower who comes into the knowledge of one of the conducts described in previous paragraphs is required to submit a Report in accordance with procedures described here below.

In order to facilitate the reception of reports, Fami S.r.l. provides several communication channels listed here below:

- a) **IN WRITING through the online platform**: Fami provides its very own Computer Portal, (the Platform), accessible from the "Whistleblowing" page on the websites <https://www.famispaspa.com/it/segnalazioni-whistleblowing/> directly on the page <https://famispaspa.segnalazioni.net/> in accordance with procedures set forth in the "Platform Operating Guide", attached to this Procedure and available on the above-cited websites.

The Platform enables the submission, including in anonymous form, of your own report or a Report received from a third party, after reading the "Privacy Information Statement".

The above-mentioned Whistleblowing page also contains this Procedure and information on how to submit a report through internal channels, as well as information on channels, procedures and precepts for submitting external Reports and for executing public Disclosure.

Upon completion of the entry, the Whistleblower must take note of the date and Unique Identification Code (a Token that univocally identifies the Report), automatically generated by the Portal, for the purpose of following the progress of Report processing over time, guaranteeing confidentiality and anonymity.

- b) **ORAL channel through the Web Platform** : The Whistleblower can also submit an oral report through access to the Platform indicated in letter a) above. The information provided in letter a) above applies, in particular regarding the Whistleblower's obligation to take note of the Unique Identification Code to enable interaction with the Manager
- c) **ORAL Channel through Interview** : The Whistleblower can request to submit an oral report by means of a direct meeting with the Manager. In such cases, the interview is documented by the Manager in minutes, subject to the Whistleblower's prior consent and reading of the personal data processing Information Statements. The Whistleblower can verify, rectify and confirm said minutes by signing them.

Reports must be sent using the above-mentioned channels and after reading the "Data Processing Information Statement for Whistleblowers" and the "Data Processing Information Statement for Reported Persons and Third Parties" (Annex 1). Use of the Web Platform is preferable.

The Manager sees to the monitoring of above-mentioned notification channels, and should be contacted in case of any malfunctions.

Fami personnel, other than those identified and authorized by the Company, and who receive a Report, are required to send it to the Manager within 7 days from reception, through the above-mentioned channels, providing information on its origin, all and any supporting documentation and duly notifying the reporting person of its submission. The recipient shall not withhold a copy and shall refrain from undertaking any autonomous initiatives as to analysis and/ or further investigation. Failure to notify of a received Report is a breach of the Procedure and may result in the adoption of suitable initiatives, including those of a disciplinary nature.

7.2. Registration and Classification

All Reports, regardless of the reception process, are registered by the Manager, who prepares the database containing an overview of essential data of reports and the management thereof (tracked through workflow) and also ensures the filing of all attached documentation as well as of any generated or acquired during analysis activities.

To this effect the Manager establishes and opens the Report Dossier.

Registration and acceptance of the Report must take place within 7 days from reception thereof. The Whistleblower must be notified of Report acceptance no later than the maximum time period, unless explicitly requested otherwise by the Whistleblower, or in cases in which they believe notice would undermine protection of the confidentiality of the Whistleblower's identity.

Following registration, the Manager analyses and classifies the Report, to limit action to reports within the remit of the Procedure.

The Manager issues a univocal identification code for each Report, which enables each Whistleblower to request processing progress.

If a Report is found to be inadequately detailed, the Manager may consider whether to request further details from the Whistleblower, as follows:

- if the Whistleblower has provided a contact (e-mail, telephone number, etc.), using said contact details;
- if there are no available contact details, using the means deemed most suitable by the Manager, on the condition that there is compliance with the principle of confidentiality

7.3. Preliminary analysis of the Report

The Manager proceeds with a preliminary analysis of the report, also by means of any document analysis, in order to verify necessary requirements are met for undertaking the next phase of investigation, proceeding with the filing of general reports and those devoid of informative elements.

For each Report, the Manager also decides on whether to involve the Company's competent Office/ Body, based on the nature of the Report and in order to ensure suitable investigations take place.

The following reports are filed by the Manager:

- (i) general ones and/or those that are not a "detailed Report";
- (ii) clearly groundless and/or beyond the scope of this Procedure;
- (iii) containing facts that have already been addressed in previous investigative activities which have since been closed, when no new information emerges from preliminary inquiries requiring additional verification activities.

Reports filed as clearly groundless insofar as submitted for the sole purpose of harming the reputation, damaging or undermining the reported person and/or company are forwarded to the Human Resources Office, which assesses suitable action to be undertaken against the Whistleblower. In any case, any sanction measures adopted by the Company will be submitted to the General Manager for the final decision.

7.4. Investigative phase

Aims and characteristics of the investigation

The aim of Report investigation activities is to proceed, within the limits of tools available to the Manager, with inquiries, analyses, and specific assessments to ascertain the reasonable truth of reported facts, and to provide any indications as to possible corrective actions in company areas and processes involved.

The aim of the investigation is to reconstruct management and decision-making processes undertaken, based on official documentation and information, as well as any that has been made available. Merit of management, opportunity, discretionary or technical-discretionary decisions do not fall within the scope of investigation analysis, except for in the limits of manifest unreasonableness, ascertained on a time-to-time basis by involved company structures/ positions.

Execution of the investigation

The Manager will also execute the investigation by acquiring information from other affected company structures and by receiving assistance from experts or consultants external to the Company.

Investigative activities are executed, by way of example, with the use of:

- company data/ documents useful for investigative purposes (e.g. extracts from company systems);
- external data bases (e.g. information on providers/ data bases on company information);

- o open sources;
- o documentary evidence acquired from company structures;
- o whenever applicable, declarations made by persons involved, or acquired during interviews, which are reported in minutes and signed

The Manager has the right to conduct investigations directly, for example by means of formal convocations and interviews with the Whistleblower, the reported person and/or other persons mentioned in the Report as being informed of matters, as well as to request above-mentioned persons to produce relative information and/ or documents.

Upon conclusion of the investigation, the Manager approves the closure of the practice and prepares a report (the **Report**) containing

- o executed activities, relative results and outcomes of any previous investigations carried out regarding the same matters or similar facts to those at hand in the Report;
- o a judgement of reasonable truth or otherwise of reported facts, with any indications regarding the opportunity for the adoption of corrective actions by management in company areas and processes involved in the Report.

Investigative activities shall not last for more than 3 (three) months from the acceptance date, unless justified and motivated reasons arise, in which case the term can be extended for a further 3 (three) months.

In the event that the Report concerns one or more members of the Company's Board of Directors, Board of Statutory Auditors or Supervisory Board, the investigation will be handled jointly by the respective Chairmen. In the event that one of the Presidents of the aforementioned bodies is involved, he or she will be replaced by the oldest member of the body or the Supervisory Board. On the other hand, in the event that the entire body or the entire Supervisory Board is involved, the investigation will be handled by the Presidents of the other two bodies/supervisory boards. In such cases, the results of the preliminary investigation will be communicated to the Board of Directors, the Board of Statutory Auditors, and the Supervisory Board insofar as they are within their respective competencies.

7.5. Notification of results

The Report, prepared by the Manager, is submitted to the CEO, so that they may undertake any initiatives within the scope of their duties;



If the reported violation relates to the predicate offenses under Legislative Decree 231/01, i.e., the requirements of the MOG, the report will be forwarded by the Manager to the Supervisory Board.

At the end of investigative activities, the manager must respond to the Whistleblower.

7.6. Information for the Whistleblower

The Whistleblower will be informed by the Manager of Report acceptance and of the outcome of activities executed by the Manager within the time limits set forth in the Decree.

If the Report is submitted through the portal, the Reporting Person will receive the Report identification code and an encrypted link to a personal page where they can interact with the Manager by chat or where they can share files and documents.

	The business management system	
PG 29	The Management of Reports - Whistleblowing	Pagina 11 di 11

The Whistleblower has the right to correspond with the Manager and monitor Report progress and said right is also guaranteed in the case of anonymous Reports.

7.7. Conservation of documentation

Information and all other acquired personal data are processed in compliance with regulation 2016/679/EU (General Data Protection Regulation - **GDPR** hereinafter).

The Manager prepares and updates all information on the report and ensures the filing of all relative supporting documentation, in order to ensure the management and traceability of reports and consequent activities.

Reports and relative documentation are conserved for the necessary length of time for Report processing and in any case no longer than for 5 (five) years from the final report procedure outcome notification date, without prejudice to additional requirements arising from any proceedings (disciplinary, penal, accounting) against the Reported Person or Whistleblower (declarations in bad faith or slanderous in nature) or from additional regulatory obligations.

Original copies of reports submitted in writing are stored in a specific protected environment.

8. MODULISTICA

Annex 1 - Information Statement on the processing of Reporting Persons, Reported Persons and Third Parties;

Annex 2 - Platform Operating Guide.