

WHISTLEBLOWING POLICY**Introduction**

With Directive (EU) 2019/1937, the European Union updated the legal framework protecting persons who report breaches of Union law, establishing minimum standards for the protection of whistleblowers across all Member States. Italy implemented the Directive through Legislative Decree No. 24 of 10 March 2023 (the "Decree").

By adopting this Policy, Ormesani Srl Società Benefit (the "Company") intends to comply with the above legal requirements and with the relevant guidance issued by ANAC, the Italian National Anti-Corruption Authority.

The purpose of this Policy is to provide whistleblowers, i.e. persons who report breaches, with clear practical guidance on what may be reported, the information a report should contain, the persons responsible for receiving reports, and how reports may be submitted.

The report-handling process protects the confidentiality of the reporting person's identity from the moment the report is received and throughout all subsequent communications. In accordance with Article 5(1)(e) of the Decree, this Policy therefore provides information on the channels, procedures, and conditions for making internal and external reports.

1. Reporting persons

The following persons may submit reports:

- a) employees, including persons working under:
 - part-time, intermittent, fixed-term, temporary agency, apprenticeship, or occasional employment arrangements (where the employment relationship is governed by Legislative Decree No. 81/2015).
 - occasional work arrangements (pursuant to Article 54-bis of Decree-Law No. 50/2017, converted into Law No. 96/2017).
- b) self-employed workers
 - under a contract for services (Article 2222 of the Italian Civil Code).
 - under a collaboration arrangement (as referred to in Article 409 of the Italian Code of Civil Procedure), including agency, commercial representation and other forms of collaboration involving continuous and coordinated work that is personal, even where no employment relationship exists.
 - under a collaboration arrangement consisting of exclusively personal and continuous work whose performance is organised by the client.
- c) persons working for entities that supply goods or services to, or conduct works on behalf of, the Company.
- d) self-employed professionals and consultants who provide services to the Company.
- e) volunteers and trainees, whether paid or unpaid, who work with the Company.
- f) shareholders and persons conducting administrative, management, control, supervisory or representative functions within the Company, including where such functions are exercised on a de facto basis (for example, members of the Board of Directors or the Supervisory Body).



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The protections afforded to reporting persons (see Section 7 of this Policy) also apply where a report, a report to the judicial or accounting authorities, or a public disclosure of information is made in any of the following circumstances:

- a) before the legal relationship described above has begun, where information concerning breaches was obtained during the recruitment process or other pre-contractual stages.
- b) during a probationary period.
- c) after the legal relationship has ended, where the information concerning breaches was obtained during the relationship itself.

2. Reportable matters and excluded reports

The types of reports that may be submitted are set out in the following table:

<i>Number of employees</i>	<i>Organisational and Management Model under Legislative Decree No. 231/2001</i>	<i>Subject matter of the report</i>
50 or more	Yes	EU and national breaches (see points a) and b) below) (Article 3(2)(b), second sentence, Legislative Decree No. 24/2023) Offences under Legislative Decree No. 231/2001 (see point c) below) Breaches of the Organisational Model (see point c) below)

More specifically, the breaches referred to in the table above may concern:

- a) breaches of national or EU provisions constituting offences in the following areas: public procurement; financial services, products and markets and the 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 the security of network and information systems; and breaches of European Union restrictive measures;
- b) breaches of EU provisions consisting of: i) acts or omissions affecting the financial interests of the Union; ii) acts or omissions relating to the internal market; iii) acts or conduct that defeat the object or purpose of the provisions of Union acts in the areas referred to above.
- c) unlawful conduct relevant under Legislative Decree No. 231/2001 or breaches of the Company's organisational and management model.

3. Reporting channels: internal, external, and public disclosure

The Company has established an internal reporting channel that safeguards the confidentiality of the identity of the reporting person, the person concerned and any other person mentioned in the report, as well as the contents of the report and the related documentation.

Generally, whistleblowing reports should first be submitted through the internal reporting channel.

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The external reporting channel established and managed by ANAC¹ may be used only under specific conditions², while public disclosure is subject to even stricter conditions³. This is without prejudice to the right to report matters to the judicial authorities.

4. Content and submission of reports

A whistleblowing report may be submitted where the following conditions are met:

- the reporting person has information, including reasonable suspicions, concerning breaches that have occurred or that, on the basis of specific evidence, may occur, of national or European Union provisions affecting the public interest or the integrity of the Company, as well as information concerning conduct intended to conceal such breaches.

and

- such information was obtained, or such suspicions arose, within a work-related context.

Reports relating exclusively to the following matters will not be considered:

- complaints, claims, or requests concerning a personal interest of the reporting person.
- the reporting person's individual employment or collaboration relationship with the Company, or relationships with persons in a higher hierarchical position.
- aspects of the private life of the person concerned that have no direct or indirect connection with the Company's business and/or professional activities.

The following reports are also not permitted:

- reports that are vexatious, defamatory, knowingly false or made solely to cause harm to the person concerned.
- reports concerning alleged breaches that the reporting person knows to be unfounded.



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<https://www.anticorruzione.it/-/whistleblowing>



² Reporting persons may use the external reporting channel (ANAC) when:



- the mandatory activation of an internal reporting channel is not required in the relevant work-related context, or, although mandatory, the channel is not active or, if active, does not comply with the requirements of the law;
- the reporting person has already made an internal report and no follow-up action has been taken;
- the reporting person has reasonable grounds to believe that an internal report would not be effectively followed up or that making an internal report could expose them to a risk of retaliation;
- the reporting person has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest.



³ Reporting persons may make a public disclosure directly when:



- the reporting person has previously made both an internal and an external report, or has made an external report directly, and no feedback has been provided within the prescribed time limits regarding the measures planned or taken to follow up on the report;
- the reporting person has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest;
- the reporting person has reasonable grounds to believe that external reporting may expose them to a risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, for example where evidence may be concealed or destroyed, or where there is a reasonable concern that the person who received the report may be in collusion with the perpetrator of the breach or may themselves be involved in the breach.

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Contents of the report

To be admissible, a report must include:

- 1.the reporting person's identifying details and contact information to which subsequent updates may be sent, subject to the provisions applicable to anonymous reports.
- 2.a clear, complete, and sufficiently detailed description of the facts being reported.
- 3.the time and place in which the reported events occurred, together with a description of the facts, including relevant contextual details and, where applicable, an explanation of how the reporting person became aware of them.
- 4.the name(s) or any other information that may help identify the person or persons believed to be responsible for the reported conduct.
- 5.details of any other persons who may be able to provide information concerning the reported fact
- 6.details of any documents that may support the report.
- 7.any other information that may help verify the existence of the reported facts.
- 8.when using the paper-based reporting channel (see below), an express statement that the reporting person wishes to benefit from whistleblower protections, for example by marking the envelope "confidential - for the attention of the Reporting Channel Manager".

How to submit a report

Whistleblowing reports may be submitted using any of the following methods:



at the reporting person's request, through a face-to-face meeting with the external Reporting Channel Manager, attorney Elena Zaggia, who may be contacted through the Platform indicated below.



through the CP KEEPER platform available on our website at:

<https://ormesani.cpkeeper.online/keeper/available-configuration-links>



by ordinary mail, placing the report in two sealed envelopes: the first containing the reporting person's identifying details and the second containing the subject matter of the report. Both envelopes must then be placed inside a third envelope marked "confidential - for the attention of the Reporting Channel Manager" and addressed to: Avv. Elena Zaggia, c/o Ormesani S.r.l., Via Giovanni Pascoli 42, 30020 Quarto D'Altino (VE), Italy.

Anonymous reports

The Company reserves the right to consider anonymous reports for the purpose of conducting further checks or investigations, provided that they contain specific, consistent and sufficiently detailed information. In any event, whistleblower protection measures apply only if the reporting person is subsequently identified and has suffered retaliation⁴.

⁴ Article 16(4) of Legislative Decree No. 24/2023.

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Forwarding reports

Whistleblowing reports must be submitted to Avv. Elena Zaggia through one of the reporting channels described above.

5. Report handling

This procedure governs the receipt, assessment and handling of reports concerning unlawful conduct of which the reporting person has become aware in a work-related context.

In managing the internal reporting channel, the Reporting Channel Manager (also referred to below as the “Manager” or the “recipient”) acts as follows:

Receipt of the report

Where a report is mistakenly sent to or received by a person who is not authorised to receive it, and it is clear that the communication is a whistleblowing report, that person must promptly notify the Reporting Channel Manager and, in any event, do so within seven (7) days of receipt. The reporting person must be informed, at the same time, that the report has been forwarded. All confidentiality obligations under this Policy remain fully applicable to that person, who may be held liable for any breach of those obligations.

The recipient must acknowledge receipt of the report within seven days of the date on which it is received. The acknowledgement will be sent to the contact details provided by the reporting person or through the IT platform where that channel has been used. If no contact details are provided, the report will be closed and filed. Anonymous reports will be registered and the related documentation retained.

Reports received by ordinary mail will be stored by the Company using appropriate safeguards designed to preserve confidentiality.

An oral report made in accordance with this Policy will be documented, with the reporting person’s consent, by the Reporting Channel Manager either by recording it on a device suitable for storage and playback or by preparing written minutes.

Where a face-to-face meeting is held with the reporting person, the meeting will be recorded. If no recording is made, or if the reporting person does not consent to recording, written minutes of the meeting will be prepared, signed by both the Reporting Channel Manager and the reporting person, and a copy will be provided to the reporting person.

Communications with the reporting person and supplementary information

The recipient will maintain communication with the reporting person and may request additional information where necessary.

Where minutes are prepared following a meeting with the reporting person, the reporting person may review, correct, and confirm the minutes by signing them.

Assessment of the report

The recipient will follow up on reports received by assessing whether the reporting person is entitled to make a report and whether the report falls within the scope of the applicable legislation, followed by an assessment of the time and place in which the reported events occurred.

Following the preliminary assessment:

- if the applicable requirements are not met, the report will be closed and filed, with the reasons for the decision recorded.
- if the applicable requirements are met, an investigation will be opened.

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Investigation

The recipient will ensure that the investigation is properly conducted by:

- collecting documents and information.
- involving external parties, where technical assistance from third-party professionals is required, or other Company functions, which are required to cooperate with the Reporting Channel Manager.
- interviewing any other internal or external persons, where necessary.

The investigation will be carried out in accordance with the following principles:

- appropriate measures will be taken to prevent the identification of the reporting person and the persons involved.
- checks will be carried out by suitably qualified persons, and all activities will be properly documented and retained.
- all persons involved in the assessment will keep the information received confidential, except where disclosure is required by law.
- checks will be conducted using appropriate measures for the collection, use, disclosure and retention of personal information, ensuring that the needs of the investigation are appropriately balanced against the protection of privacy.
- appropriate measures will be implemented to manage any conflict of interest where the report concerns the recipient.

Feedback to the reporting person

Within three months of the acknowledgement of receipt or, where no acknowledgement was issued, within three months of the expiry of the seven-day period following submission of the report, the recipient will provide feedback on the report, communicating one of the following:

- **that the report has been closed and filed, together with the reasons for the decision; or**
- **that the report has been found to have merit and has been referred to the competent internal bodies for the appropriate follow-up action; or**
- **the activities already carried out and those still to be completed, where verification requires a longer investigation, together with any measures adopted, including actions already taken or referral to the competent authority.**

6. Conflict of interest

If the Reporting Channel Manager becomes aware that, for any reason, they are in a conflict-of-interest situation, they must immediately inform the Company's governing body, which will urgently appoint a substitute Reporting Channel Manager. The appointment must be made in sufficient time to comply with the statutory deadlines. In particular, where a conflict of interest exists and a report is received, the Reporting Channel Manager must forward the report to the substitute Manager no later than seven days after receipt, together with the date of receipt and any other relevant information (e.g. the communication channel used), while simultaneously informing the reporting person.

7. Protection and liability of the reporting person

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Reporting persons may not be subjected to any form of retaliation. The law provides that persons who make a report may not be sanctioned, demoted, dismissed, transferred, or subjected to any other organisational measure that directly or indirectly has an adverse effect on their working conditions or results in discrimination or retaliation against them.

The reasons that lead a person to report, make a disclosure or make a report to the competent authorities are irrelevant for the purposes of whistleblower protection.

In judicial or administrative proceedings, as well as in out-of-court proceedings concerning the determination of prohibited conduct against reporting persons, such conduct is presumed to have been conducted because of the report, public disclosure, or report to the judicial or accounting authorities. The burden of proving that the conduct was motivated by reasons unrelated to the report, public disclosure or report to the authorities lies with the person who conducted that conduct.

Any alleged discriminatory or retaliatory measures must be reported to ANAC, which has sole responsibility for determining whether the retaliatory measure resulted from the reporting of unlawful conduct and, where the Company fails to demonstrate that the measure was unrelated to the report, for imposing an administrative financial penalty.

Processing of personal data. Confidentiality

All personal data will be processed in accordance with Regulation (EU) 2016/679, Italian Legislative Decree No. 196 of 30 June 2003 and Articles 13 and 14 of the Decree. Failure to comply with confidentiality obligations may also result in disciplinary liability, without prejudice to any further liability provided for by law.

The privacy notice concerning the processing of personal data in connection with whistleblowing reports is attached to this Policy.

Internal and external reports and the related documentation will be retained for the time required to handle the report and, in any event, for no longer than five years from the date on which the final outcome of the reporting procedure is communicated, in compliance with confidentiality and personal data protection requirements.

Liability of the reporting person

The Company ensures that the person concerned has the right to be informed, within a reasonable period, of any reports involving them, and guarantees their right of defence should disciplinary proceedings be initiated against them.

This procedure is without prejudice to the criminal and disciplinary liability of the reporting person in the event of a maliciously false or defamatory report under the Italian Criminal Code and Article 2043 of the Italian Civil Code.

Any abuse of the whistleblowing procedure may also give rise to liability in disciplinary proceedings and before other competent bodies. This includes reports that are manifestly unfounded and/or made solely to harm the person concerned or other persons, as well as any other improper use or deliberate misuse of the procedure.

8. Entry into force and amendments

This Policy enters into force on 13 July 2025. From that date, all previous provisions concerning the same subject matter, regardless of how they were communicated, are repealed to the extent that they are incompatible with or differ from this Policy, which replaces them.

The Company will ensure that the Policy is appropriately communicated and will provide a copy to each employee.

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All employees may, whether they consider it necessary, submit reasoned proposals for amendments or additions to this Policy. Such proposals will be reviewed by the Company's General Management.

This Policy will in any event be reviewed periodically.

PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 IN CONNECTION WITH THE WHISTLEBLOWING POLICY

Through this Privacy Notice, Ormesani Srl Società Benefit (the "Company") provides the information required under Articles 13 and 14 of Regulation (EU) 2016/679 (the "General Data Protection Regulation" or "GDPR") concerning the processing of personal data carried out by the Company in connection with its Whistleblowing Policy, adopted in accordance with Italian Legislative Decree No. 24 of 10 March 2023⁵, and in particular all activities and obligations relating to the operation of the Company's whistleblowing reporting system.

The information below is provided to "reporting persons" and to all other persons whose personal data may be processed, including, for example, persons identified as potentially responsible for unlawful conduct, any "facilitators" (as defined by the applicable legislation), and any other person involved in any capacity in the Whistleblowing Policy.

1. Data Controller

The Data Controller is Ormesani Srl Società Benefit, Via G. Pascoli 42/N, 30020 Quarto d'Altino (VE), Italy.

2. Categories of personal data processed and purposes of processing.

Under the applicable legal framework, the Company may obtain personal data contained in whistleblowing reports or in the records and documents attached to them, where such reports are submitted through the channels provided for by the above Policy.

Depending on the contents of a report, its receipt and handling may involve the processing of the following categories of personal data:

⁵ Legislative Decree implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

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- a) ordinary personal data as defined in Article 4(1) of the GDPR, including, for example, identification data (first name, surname, date, and place of birth), contact details (landline and/or mobile telephone number, postal/e-mail address) and job role or position.
- b) “Special categories” of personal data under Article 9 of the GDPR, including, for example, information concerning health, political opinions, religious or philosophical beliefs, sexual orientation, or trade union membership.
- c) personal data relating to criminal convictions and offences under Article 10 of the GDPR, including data concerning related security measures.

Regarding the above categories of personal data, it is important that reports do not contain information that is manifestly irrelevant for the purposes of the applicable whistleblowing framework. Reporting persons are specifically requested not to include special-category data or data relating to criminal convictions and offences unless such data are necessary and strictly relevant to the report, in accordance with Article 5 of the GDPR.

The above information will be processed by the Company, as Data Controller, in accordance with Italian Legislative Decree No. 24/2023 and, as a general rule, for the purpose of carrying out the investigations necessary to establish whether the reported facts are substantiated and to adopt any resulting measures.

The Data Controller may also use the data where necessary for the establishment, exercise, or defence of its rights in judicial, administrative, or out-of-court proceedings, including civil, administrative, or criminal disputes arising in connection with the report.

3. Legal bases for processing personal data

The primary legal basis for the processing of personal data is compliance with a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR. Under the legislation referred to above, the Data Controller is required to establish and manage dedicated channels for receiving reports of unlawful conduct that may affect the integrity of the Company and/or the public interest.

In the circumstances provided for by the applicable legislation, the reporting person may be asked to provide specific and freely given consent pursuant to Article 6(1)(a) of the GDPR, in particular where it becomes necessary to disclose their identity or where oral reports are to be recorded, whether by telephone, voice-messaging systems or during face-to-face meetings with the Reporting Channel Manager.

The processing of any special-category personal data included in reports is based on the performance of obligations and the exercise of specific rights of the Data Controller or the data subject in the field of employment law, pursuant to Article 9(2)(b) of the GDPR.

Where personal data are processed for the purpose of establishing, exercising or defending a legal claim, the legal basis is the Data Controller’s legitimate interest pursuant to Article 6(1)(f) of the GDPR. For the same purpose, the processing of any special-category personal data is based on Article 9(2)(f) of the GDPR.

4. Nature of the provision of personal data

Providing personal data is optional, since anonymous reports may also be submitted to the Company if they contain specific, consistent and sufficiently detailed information, without prejudice to the protective measures applicable to reporting persons under the relevant legislation. Where



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personal data are provided, they will be processed for the purpose of managing the report within the limits and subject to the confidentiality safeguards laid down by the applicable legislation.

5. Methods of processing and data retention period

Personal data contained in reports submitted in accordance with the Whistleblowing Policy will be processed by persons duly authorised by the Company and in accordance with the principles of fairness, lawfulness and transparency set out in Article 5 of the GDPR.

Personal data may be processed in paper and/or electronic form for the purposes of storing, managing and transmitting them, using appropriate physical, technical and organisational measures designed to safeguard their security and confidentiality throughout every stage of the procedure, including the filing and storage of the report and related documents, subject to Article 12 of Italian Legislative Decree No. 24/2023. Particular care will be taken to protect the identity of the reporting person, the persons involved and/or otherwise mentioned in reports, the contents of the reports and the related documentation.

Reports received by the Company, together with the attached records and documents, will be retained for as long as necessary to handle them and, in any event, as required by law, for no longer than five years from the date on which the relevant final outcome is communicated. After that period, reports will be deleted from the system or retained in anonymised form.

Consistent with the principles set out above, any personal data contained in reports that are manifestly irrelevant to the report will be deleted immediately.

6. Disclosure and transfer of personal data

In addition to the internal personnel specifically authorised by the Data Controller, personal data collected in connection with the Whistleblowing Policy and for the purposes described above may also be processed by the following third parties, formally appointed as processors where the conditions set out in Article 28 of the GDPR are met:

- providers of consultancy and support services relating to the implementation of the Whistleblowing Policy.
- IT companies and professionals responsible for implementing appropriate technical, IT and/or organisational security measures in relation to information processed through the Company's systems.

Where the applicable legal requirements are met, personal data may be disclosed to the judicial authorities and/or law-enforcement authorities upon request in the context of judicial investigations.

Personal data will be processed within the European Economic Area (EEA) and stored on servers located within the EEA.

Personal data will not under any circumstances be made publicly available.

7. Rights of data subjects

Each data subject is entitled to exercise the rights provided for in Articles 15 et seq. of the GDPR, including, for example, the right to obtain access to their personal data from the Data Controller, rectification or erasure of such data, or restriction of the processing concerning them. If the response received is unsatisfactory, the data subject may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

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To exercise these rights, the data subject must submit a request in any written form to the Data Controller at privacy@ormesani.it or send to the same address the form available on the website of the Italian Data Protection Authority.

Please note that the above rights of data subjects may be restricted pursuant to Article 2-undecies of Italian Legislative Decree No. 196 of 30 June 2003 (the "Italian Privacy Code", as amended by Legislative Decree No. 101/2018) for the period and to the extent that such restriction constitutes a necessary and proportionate measure where the exercise of those rights could result in actual and concrete prejudice to the confidentiality of the identity of reporting persons.

In such cases, data subjects may nevertheless apply to the Italian Data Protection Authority, which will assess whether the conditions are met for it to act in accordance with Article 160 of Italian Legislative Decree No. 196/2003.



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