



WHISTLEBLOWING POLICY

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1. Purpose and aim

Levoni S.p.A. (hereinafter also the "**Company**") has implemented a whistleblowing system in accordance with Legislative Decree 24/2023, which "*Implements EU Directive 1937/2019 on the protection of persons who report breaches of Union law and lays down provisions regarding the protection of persons who report breaches of national regulatory provisions*". Legislative Decree 24/2023, based on the European Directive, seeks to strengthen the legal protection afforded to those who report breaches of national or European regulatory provisions of which they have become aware in the course of their work, and which harm the interests and/or integrity of the private or public entity to which they belong.

The Company already had a reporting system in place, governed by the Organization, Management and Control Model as per Legislative Decree 231/2001. This system aligns with the provisions of Law 179/2017, which outlines "*Provisions for the protection of individuals reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship.*"

The whistleblowing system was also adopted for the purpose of identifying and countering possible violations of the Code of Ethics, the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, and the Policies and Procedures adopted by the Group, as well as other unlawful or irregular conduct (specified in paragraph 5) that could undermine the integrity of the Entity.

The Policy, therefore, regulates the Report handling system, implementing the provisions of the Organization, Management, and Control Model and the Group's Code of Ethics. Its primary objective is to foster a culture of ethics, legality, and transparency within the organization and in its interactions.

2. Regulatory and documentary references

- EU Directive 1937/2019 on the "*The Protection of Persons Reporting Breaches of Union Law.*"
- EU Regulation 2016/679 on the "*Protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).*"
- Legislative Decree 231/2001 on "*The regulation of the administrative liability of legal persons, companies and associations, including those without legal personality.*"
- Legislative Decree 24/2023 on the "*Implementation of EU Directive 1937/2019 on the protection of persons who report breaches of Union law and laying down provisions concerning the protection of persons who report breaches of national laws.*"
- Guidelines for the construction of Organization, Management and Control Models, pursuant to Legislative Decree 231/2001, issued by Confindustria and updated to June 2021
- Guidelines on the protection of persons who report breaches of Union law and protection of persons who report breaches of national regulatory provisions. Procedures for the submission and management of external reports, approved by the National Anticorruption Authority (ANAC) in Resolution No. 311 of July 12, 2023
- Organization, Management and Control Model pursuant to Legislative Decree 231/2001
- Code of Ethics
- Corporate Policies and Procedures.

3. Outreach, communication, and awareness initiatives

The **dissemination** of the Policy adheres to regulatory provisions and employs various channels, including posting information in workplaces (e.g., bulletin boards) and publication on the website.

The Company also conducts personnel **communication** and **training** related to the Policy, including through cultural promotion activities on the discipline of whistleblowing.

4. Whistleblowers, other related parties, and scope of protections

A **Whistleblower** is defined as the individual who makes a report or public disclosure (*see below*) concerning violations they have become aware of within the scope of their work context and/or work or professional activities conducted on behalf of the Company (as per Article 2, paragraph 1, letters g) and i) of Legislative Decree 24/2023). In particular:

- Employees
- Self-employed workers, partnership holders, freelancers, and consultants
- Volunteers and trainees, both paid and unpaid

- Shareholders and persons with administrative, management, control, supervisory or representative functions (including de facto)

The protections in favor **Whistleblower** (so-called "*protective measures*") referred to in the following paragraphs also extend to the following figures:

- Facilitators (individuals who assist the whistleblower in the reporting process)
- Persons belonging to the same work environment as the whistleblower and to whom the whistleblower is related by a stable emotional or kinship link
- The whistleblower's work colleagues, who are linked to the whistleblower by an ongoing and current relationship
- Entities owned by the whistleblower or for which the protected persons work.

As provided for in Art. 3, par. 4 of Legislative Decree 24/2023, whistleblower protection is also guaranteed in the following cases:

- a) When the legal (i.e., employment) relationship has not yet begun, if the information being reported was acquired during the recruitment process or in other pre-contractual stages
- b) During the probationary work period
- c) After the dissolution of the legal (i.e., employment) relationship, if the reported information was acquired during the course of the relationship.

5. Subject of the Report

Breaches of national or European regulatory provisions and behaviors and acts or omissions that harm the public interest and/or the integrity of the Company, including:

- Administrative, accounting, civil or criminal offenses
- Unlawful conduct relevant under Legislative Decree 231/2001
- Breaches of the Organization, Management and Control Model adopted pursuant to Legislative Decree 231/2001
- Offenses falling within the scope of European Union acts relating to, but not limited to, the following areas: public procurement; financial services, products & markets and prevention of money laundering and terrorist financing; product safety and compliance; and environmental protection
- Other acts or omissions affecting the financial interests of the European Union and/or concerning the internal market.

Any conduct, whether confirmed or suspected, that violates the law or does not comply with the Code of Ethics, Policies, and Procedures adopted by the Company is also eligible for reporting. Illicit conduct reported must concern situations within the direct awareness of the Reporting Person through their employment relationship. This includes information through the nature of the office held, but also extends to incidental knowledge gained during and or because of the performance of work-related duties.

Reports eligible for consideration must be substantiated and well-founded, focusing on facts directly observed by the whistleblower and not based on assumptions or current rumors.

Furthermore, the reporting system is not intended for the whistleblower's personal purposes, claims, or complaints of a more general nature related to the employment/collaboration relationship, or interactions with hierarchical superiors or colleagues. Such matters should be addressed through procedures within the purview of the corporate structures.

The individual designated to receive and review reports, as detailed in Section 7, will assess all received reports. They will then take appropriate actions at their reasonable discretion and responsibility and within the scope of their authority. If required, they may hear from both the author of the report and the individual responsible for the alleged violation. Any subsequent decision will be explained.

Any disciplinary measures will be applied by the relevant corporate bodies, in accordance with the provisions of the disciplinary system of the Company's Organization Management and Control Model.

5.1 Action, facts, and conduct that can be reported

To assist the Reporting Party in identifying the **facts that may constitute the subject of a Report**, the following list provides examples of relevant violations and/or conduct, and is by no means exhaustive or binding:

- ✓ Breach of the Organization, Management and Control Model, Code of Ethics, Policies, and Procedures adopted by the Company

- ✓ Offering a monetary sum or granting other benefits to a public official or an individual responsible for a public service in exchange for carrying out their duties (e.g., facilitation of a practice) or for performing an act contrary to their official duties (e.g., failure to issue a tax irregularity report)
- ✓ Engaging in conduct aimed at obstructing the activities of the public administration (e.g., failure to deliver documentation, submission of false or misleading information)
- ✓ Promising or providing money, goods, services, or other benefits with the intent to bribe suppliers or customers
- ✓ Accepting money, goods, services, or other benefits from suppliers or other parties in exchange for favors or disloyal behavior
- ✓ Engaging in illicit agreements with suppliers, consultants, customers, or competitors (e.g., issuance of fictitious invoices, price agreements, etc.)
- ✓ Forgery, alteration, destruction, or concealment of documents
- ✓ Irregularities in accounting-administrative or tax compliance, or in the formation of the Company's financial statements
- ✓ Falsifying of expense reports (e.g., "inflated" reimbursements or for false travel)
- ✓ Stealing money, valuables, supplies, or other property belonging to the Company or customers
- ✓ Disclosing confidential information without authorization
- ✓ Computer fraud
- ✓ Conduct aimed at obstructing the equality of women and men in terms of their rights, treatment, responsibilities, opportunities, and economic and social outcomes
- ✓ Offenses falling under the scope of European Union or national acts implementing EU acts in the areas of public procurement; financial services, products & markets and prevention of money laundering and terrorist financing; product safety and compliance; and environmental protection
- ✓ Other matters provided for in the regulations.

5.2 Actions, facts, and conduct that cannot be reported

The whistleblowing system must not be used to offend or harm the personal and/or professional honor and/or decorum of the individual(s) to whom the reported facts are referred or to knowingly spread unfounded accusations.

Specifically, by way of example and not limitation, the following are **prohibited**:

- (i) The use of insulting expressions
- (ii) Submitting Reports for purely defamatory or slanderous purposes
- (iii) Submitting Reports of a discriminatory nature with reference to sexual, religious, and political orientations, or to the racial or ethnic origin of the Reported Person
- (iv) Submitting Reports made for the sole purpose of harming the Reported Person
- (v) Other matters not provided for in the regulations.

5.3 Non-relevant reports

Reports must be relevant to the scope of this Policy.

Reports are not considered relevant when they:

- (i) Refer to Reported Persons or companies that fall outside the scope outlined by this Policy
- (ii) Reference facts, actions, or conduct that are not subject to Reporting under this Policy
- (iii) Pertain exclusively to aspects of the Reported Person's private life, without any direct or indirect connection with the work/professional activity carried out within the Company or in relation to it
- (iv) Relate to a dispute, claim, or demand associated with a personal interest of the whistleblower
- (v) Lack completeness and/or substantiation, failing to meet verifiability criteria as outlined in the following paragraph

(vi) Other matters not provided for in the regulations.

6. Content of the report

Reports must be substantiated, verifiable, and complete with all information for ascertaining facts and identifying individuals involved in violations.

The Whistleblower is responsible for the content of the Report.

Specifically, the minimum **requirements for the Report** are:

- ✓ The particulars of the person making the Report, including their professional qualification or position. This is without prejudice, however, to the possibility of submitting an anonymous report (*see below*)
- ✓ A clear and complete description of the unlawful conduct that is the subject of the Report, including the way it became known
- ✓ The date and place of the event
- ✓ The name and role (job title, professional position, or service in which they perform their activity) that make it possible to identify the person(s) to whom responsibility for the reported facts can be attributed
- ✓ Appropriate supporting documentation or any documents aimed at substantiating the reported facts
- ✓ Any other information relevant to the finding of the reported facts.

Reports where the identity of the Whistleblower cannot be determined are considered anonymous.

Although permitted, anonymous reports are not recommended due to limitations on interactions with the Whistleblower and limitations to the appropriate substantiation of the facts.

However, substantiated anonymous reports that reveal facts and situations related to specific contexts are equated with "ordinary" reports.

Please note that the confidentiality of the whistleblower 's data is always guaranteed, as well as the protection of the whistleblower from any form of retaliation or discrimination.

7. The person responsible for managing internal whistleblowing reports

To be able to effectively fulfil the objectives of the current regulations and safeguard the integrity of the Company while protecting whistleblowers, the Company has taken steps to designate an internal **Whistleblowing Reports Manager**.

This figure receives specialized training around report management, guaranteeing the autonomy required by Article 4 of Legislative Decree 24/2023).

8. Internal reporting channels

In accordance with the provisions of Legislative Decree 24/2023, Reports may be made through the following **channels**, which guarantee the confidentiality of the identity of the Whistleblower during report handling in the activities of handling the report.

➤ WRITTEN REPORTS

The Company has implemented a secure platform, which incorporates encryption tools, to uphold the confidentiality of the Whistleblower's identity, any third parties named in the report, as well as the content of the Report and related documentation.

Unauthorized personnel is not allowed to access the platform.

The platform can be reached at the following address:

wb.levoni.it

➤ VERBAL REPORTS

through a voice messaging system, available on the platform

or

By requesting a face-to-face meeting, at the request of the whistleblower, available on the platform

9. External reporting channels

In the cases provided for in the regulations, the Whistleblower may also make a so-called "external" report.

In this case, the recipient of the Report will be the National Anti-Corruption Authority (ANAC), which activates and manages an external reporting channel.

The regulations provide for external reporting if:

- ✓ An internal report has already been made and it has not been followed up
- ✓ There are reasonable grounds to believe that, if an internal report were made, it would not be effectively followed up, or that the report itself might lead to retaliation/discrimination
- ✓ There is good reason to believe that the violation may constitute an imminent or obvious danger to the public interest.

Guidelines on procedures for the submission and handling of external reports are available on the ANAC website.

10. Public disclosures

The Reporting Party, pursuant to Article 15 of Legislative Decree 24/2023, is also protected when making a so-called "**public disclosure**" of information about violations through the press or electronic media, or otherwise through means of dissemination capable of reaching a large number of people (Article 2, paragraph 1, lett. f) of Legislative Decree 24/2023).

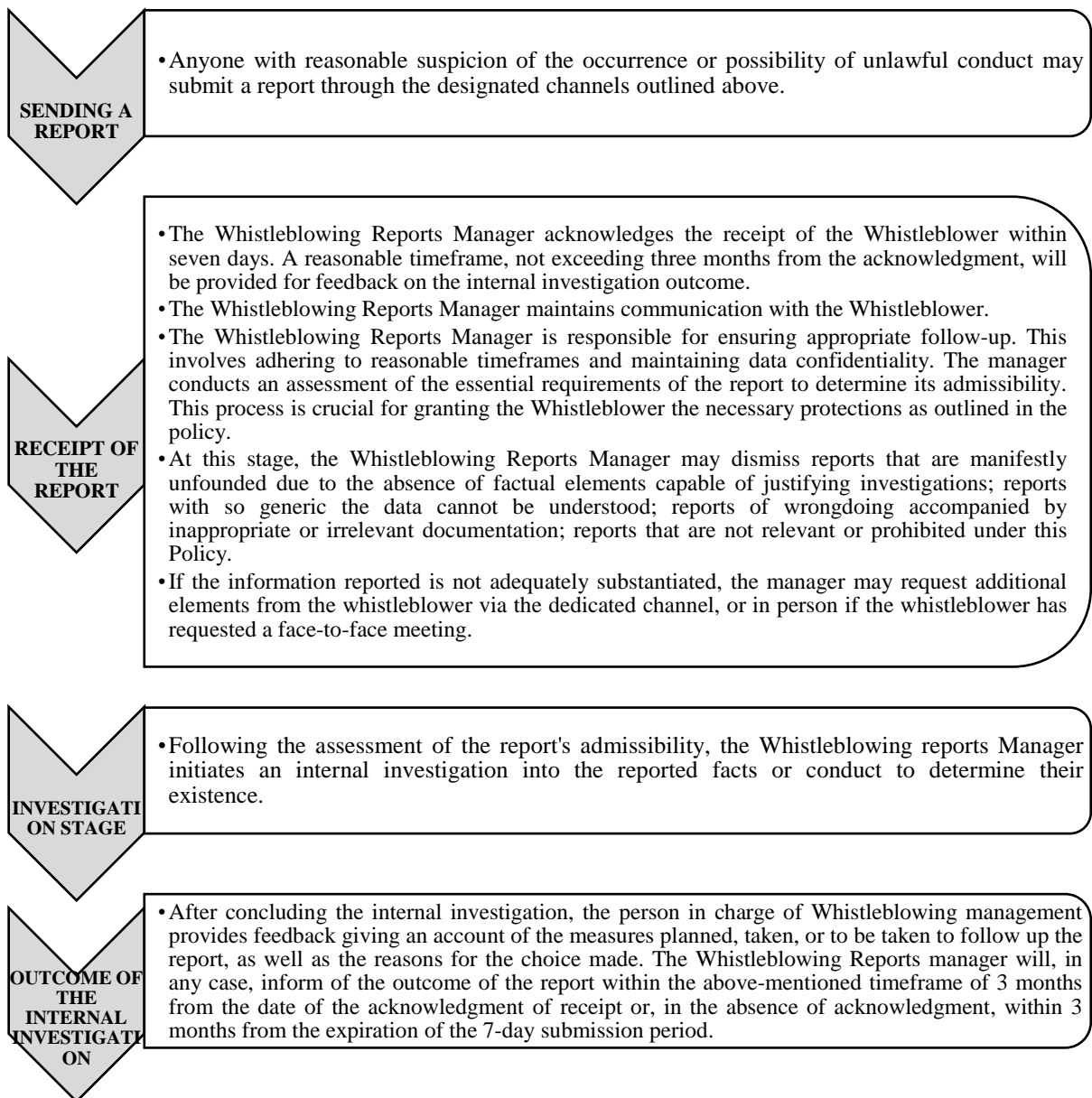
The protection of the Whistleblower who makes a public disclosure is only guaranteed if, at the time of the disclosure, one of the following conditions is met:

- ✓ The Whistleblower has previously made an internal and external report or has made an external report directly, under the conditions and in the manner prescribed by the regulations, but no response has been given within the prescribed time
- ✓ The Reporting Officer has probable cause to believe that the violation may constitute an imminent or obvious danger to the public interest
- ✓ The Whistleblower has well-founded reason to believe that the external report may carry the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those where evidence may be concealed or destroyed or where there is a well-founded fear that the Whistleblower may be colluding with the violator or involved in the violation.

11. Reporting illicit conduct

All Reports and information on subsequent actions, investigations and resolutions must be recorded and retained in accordance with legal requirements.

To this end, the illicit conduct reporting *process* includes:



12. The protection of the confidentiality of the Whistleblower, reported or involved persons, and others

In the case of an internal or external Report, it is the duty of the Whistleblowing Reports Manager to ensure the **confidentiality of the Whistleblower** from the moment the Report is taken in charge, even when the Report subsequently turns out to be erroneous or unfounded. With a view to extending the system of safeguards as far as possible, Legislative Decree 24/2023 has recognized that confidentiality must also be guaranteed to the persons reported or otherwise involved, and to persons other than the Whistleblower.

As detailed in the aforementioned Decree, the obligation of confidentiality is extended not only to the names of the Whistleblower and above-mentioned individuals, but also to any other item of information or element, including attached documentation, from which their identity can be inferred directly or indirectly.

Confidentiality must also be ensured in jurisdictional and disciplinary matters. Specifically, within the framework of disciplinary proceedings activated by the Company against the alleged perpetrator of the violation, the Whistleblower's identity may not be disclosed. This applies even when the accusation of the disciplinary charge stems from investigations that are separate, supplementary, or even consequent to the report. If the identity of the Whistleblower is indispensable for the defense of the individual facing disciplinary charges, disclosure is permissible only with the express consent of the Whistleblower.

The confidentiality of the whistleblower may be waived when:

- ✓ The whistleblower expressly consents to the disclosure of their identity

- ✓ A judgement of the Court of First Instance has found the whistleblower criminally liable for offenses like slander or defamation, or for crimes committed by making the report, or where the whistleblower has been found to be civilly liable for willful misconduct or gross negligence in connection with the report
- ✓ Anonymity is not enforceable by law and the identity of the whistleblower is required by the judicial authority in connection with investigations (criminal, tax or administrative investigations, inspections by supervisory bodies).

13. Processing of personal data of the whistleblower

The Company is the data controller in accordance with **Regulation (EU) 2016/679** (so-called **GDPR**) and communicates a specific privacy policy in this regard. The personal data of the Whistleblowers, Whistleblowers and all subjects involved in the Whistleblowing are processed for the exclusive purpose of fulfilling the legal obligations provided for in paragraph 2 and in any case complying with the provisions of Regulation (EU) 2016/679 and Legislative Decree 51/2018. The processing is carried out using manual, computerized and telematic tools, in such a way as to ensure the security and confidentiality of the data in full compliance with the provisions of the law and regulations. The management of reports is carried out directly by the organization of the Data Controller, through appropriately designated and trained individuals, who act as Authorized Persons.

The identity of the Whistleblower may not be disclosed to persons other than those competent and authorized to receive or follow up Reports (person responsible for handling the Report) without his or her express consent. Pursuant to Articles 6 and 7 of the GDPR, in order to be able to use the identity of the Whistleblower and any other information from which such identity may be inferred, directly or indirectly, for the reasons expressly provided for in Article 12 of Legislative Decree 24/2023, the data controller, through specially authorized persons such as the person in charge of handling the report, is obliged to request the Whistleblower to give his or her consent to the processing of personal data for the specific processing.

14. Prohibition of retaliation or discrimination against the whistleblower

No form of retaliation or discriminatory measure related, directly or indirectly, to the Whistleblower is permitted or tolerated against the Whistleblower.

Discriminatory measures include, for example, unjustified disciplinary actions and any other form of retaliation that results in intolerable working conditions.

If a Recipient believes that he or she has been the victim of conduct prohibited by this Policy, he or she may inform the reporting manager. If it is determined that a Recipient has been the victim of prohibited conduct, appropriate corrective measures will be taken to restore the situation and/or to remedy the negative effects of discrimination or retaliation and initiate disciplinary proceedings against the perpetrator.

15. Processing the whistleblower's personal data

The Policy does not absolve the **Whistleblower of liability**, including **disciplinary liability**, in cases of slanderous or defamatory reporting, or reporting made with malice or gross negligence, presenting untrue facts.

Pursuant to Art. 21, par. 1, lett. c) of Legislative Decree 24/2023, ANAC may impose a fine of 500 to 2,500 euros against the Whistleblower, if they are found, with malice or gross negligence, liable for offenses of slander and defamation.

Any forms of abuse of this Policy, such as Reports that are manifestly opportunistic and/or made for the sole purpose of harming the reported person and/or others, and any other hypotheses of misuse or intentional instrumentalization of the institution covered by this Policy are also a source of disciplinary liability.

16. Traceability and archiving

The Company takes precautions for the preservation of information and documentation related to the identity of the whistleblower and the content of the report pursuant to Article 14 of Legislative Decree 24/2023.

Internal Reports and related documentation are retained for the duration necessary for processing the report, with a maximum retention period of five years from the date of communication of the outcome of the reporting procedure. This retention period adheres to the confidentiality obligations outlined in Article 12 of the aforementioned Decree.

In the case of verbal reports, preservation in accordance with Article 14 of Legislative Decree 24/2023 is essential. Specifically:

- When, at the Whistleblower's request, the Report is verbally submitted during a **meeting**, it shall be documented, with the Whistleblower's consent, either through recording on a device suitable for storage and listening or by creating minutes. The Whistleblower shall verify and confirm the minutes through their signature.

The Policy, drafted in accordance with the requirements outlined by current regulations and the values of the Code of Ethics, is an integral part of the Organization, Management and Control Model adopted by the Group.