

WHISTLEBLOWING POLICY

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1. PREMISE

Law No. 179 of November 30, 2017, on *whistleblowing* (reporting of wrongdoing and irregularities) extended to the private sector the protection of employees or collaborators who report significant wrongdoing pursuant to Legislative Decree 231 of 2001 on corporate administrative liability. It introduced substantial amendments to Legislative Decree 231/2001 and required companies, within their organizational structure, to adopt measures that, thanks to the cooperation of their employees, bring to light any potentially criminal or illicit acts that occur during the course of business operations. Pursuant to Legislative Decree 24/2023 (implementing EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law and laying down provisions on the protection of persons reporting breaches of national legislation), the scope of the obligation to activate an internal reporting channel has been further expanded for both public and private sector entities.

2. MAIN SOURCES AND PRACTICES

- EU Directive No. 2019/1937 of the European Parliament and of the Council of 23 October 2019 ;
- Legislative Decree n. 24/2023, of 10 March 2023 ;
- ANAC Regulation for the management of external reports and for the exercise of ANAC's sanctioning power pursuant to Legislative Decree no. 24/2023 of 10 March 2023, adopted with resolution no. 301 of 12 July 2023 ;
- ANAC Guidelines on the protection of persons reporting violations of Union law and the protection of persons reporting violations of national legislation , adopted with Resolution no. 311 of 12 July 2023.
- New “*whistleblowing* ” regulations - Operational guide for private entities prepared by Confindustria, October 2023.

3. AIM AND PURPOSE OF THE PROCEDURE

This procedure applies to GFM SpA .

This document aims to describe and regulate the system for reporting violations, as defined below, of which the whistleblower, as also defined below, becomes aware during the course of his or her relationship and work with the Company, as well as the protection mechanisms established to protect the whistleblower. Among other things, the document aims to describe:

- a) the roles and responsibilities of the functions involved in managing reports;
- b) the objective perimeter and content of the report;
- c) the subjective scope of application;
- d) the procedure and channels to be used for reporting alleged violations;
- e) the methods for managing reports and the procedure that is initiated when a report is made;
- f) the methods of informing the whistleblower and the reported person about the progress of the procedure;
- g) the specific protection measures granted to the subjects who make the reports.

The purpose of this document, therefore, is to remove factors that could hinder or discourage the use of *whistleblowing*, doubts and uncertainties about the procedure to follow, and fears of retaliation or discrimination.

4. DEFINITIONS

In this policy, the following expressions have the meanings indicated below:

- a) “ **ANAC** ”: National Anti-Corruption Authority, an independent Italian administrative authority tasked with protecting the integrity of public administration, combating illegality, fighting corruption, implementing transparency, and overseeing public contracts;
- b) “ **CCNL** ”: the National Collective Labour Agreements (CCNL) for the Metalworking sector applied to employees and the Industrial Company Agreement for managers of the Company, each as applied to the individual employment relationship;
- c) “ **Supervisory Body**” or “**Whistleblowing Officer** ”: (hereinafter also referred to simply as the “ODV”) an autonomous, dedicated collegial body with specifically trained personnel for the management of the internal reporting channel;
- d) “ **Work Context** ” : current or past work or professional activities, regardless of their nature, through which the Reporting Person acquires information on violations and in which he or she may risk retaliation in the event of a Report or Public Disclosure or a complaint to the judicial or accounting authorities. In any case, these activities must be carried out by individuals who have established one of the work or professional relationships with the Company expressly indicated by the legislator in Legislative Decree no. 24/2023;
- e) “ **Recipients** ”: Shareholders who are natural persons, persons with administrative, management, control, supervisory or representative functions, even if such functions are exercised merely de facto, Company Personnel (as defined below), Employees (as defined below), self-employed workers ¹, collaborators pursuant to art. 409 of the Italian Code of Civil Procedure and art. 2 of Legislative Decree 81/2015, who carry out their work at the Company, workers or collaborators who carry out their work at companies that supply goods or services or that carry out works for third parties, including the Company, freelancers and consultants who work for the Company;
- f) “ **Employees** ”: all natural persons who have an employment relationship with the Company, including managers, including part-time, intermittent, fixed-term, agency, apprenticeship, and accessory employment relationships, as well as workers who perform occasional services (whose employment relationship is governed by art. 54-bis of Legislative Decree 50/2017, converted with second amendment by Law 96/2017);
- g) “ **Public Disclosure** ”: make information about violations public through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people;
- h) “ **Facilitator** ”: a natural person who assists the Reporting Person in the reporting process, operating within the same work context and whose assistance must be kept confidential;
- i) “ **Violation Information** ”: information, including well-founded suspicions, regarding Violations committed or which, on the basis of concrete elements, could be committed in the Company with which the Reporting Person or the person filing the complaint with the judicial or accounting authority has a legal relationship pursuant to Article 3, paragraph 3, of Legislative Decree 24/2023 , and of which he or she has become aware in the context of his or her work context, as well as elements regarding conduct aimed at concealing such Violations;
- j) “ **Report Book** ” : a file intended for collecting reports, the creation, drafting, and retention of which is the responsibility of the Supervisory Body or *Whistleblowing Officer* . Although no

¹ This includes the self-employed workers listed in Chapter I of Law 81/2017, such as workers with independent employment relationships governed by Title III of Book V of the Civil Code, including the contracts of employment referred to in Article 2222 of the same Civil Code; commercial representation relationships and other collaborative relationships resulting in the provision of continuous and coordinated work, predominantly personal, even if not of an employee nature (for example, lawyers, engineers, social workers who provide their work for a private sector entity by organizing it independently).

specific format is required for validity, the Report Book is a suitable document for ensuring the confidentiality of the information contained therein and its proper retention;

- k) “ **Corporate Bodies** ”: the Board of Directors and/or the Board of Statutory Auditors and/or the Supervisory Body of the Company, depending on the meaning of the reference phrase;
- l) “ **Personnel** ”: all individuals who are, even temporarily, in working relationships with the Company, even if they do not have the qualification of Employees (such as volunteers, interns, paid or not), those hired on a probationary period, as well as those who do not yet have a legal relationship with the Company or whose relationship has ceased if, respectively, the Information on violations was acquired during the selection process or in other pre-contractual phases or during the course of the employment relationship ²;
- m) “ **Reporting Person** ” or “ **Reporter** ”: the natural person who makes the Report and/or Public Disclosure of Information on violations acquired within his/her Work Context;
- n) “ **Involved Person** ”: the natural or legal person mentioned in the Internal or External Report or in the Public Disclosure as the person to whom the Violation is attributed or as a person otherwise implicated in the reported or publicly disclosed Violation;
- o) “ **Feedback** ”: communication to the Reporting Person of information relating to the follow-up that is being given or intended to be given to the Report;
- p) “ **Retaliation** ”: any behavior, act, or omission, even if only attempted or threatened, carried out as a result of the Report, the complaint to the judicial or accounting authorities, or the Public Disclosure, and which causes or may cause unjustified harm to the Reporting Person or the person who filed the complaint, directly or indirectly. By way of example, the following constitute retaliation: the cases referred to in art. 17 of Legislative Decree 24/2023 ³;
- q) “ **Report** ” or “ **Report** ”: the written or oral communication of information on the Violations referred to in Legislative Decree 24/2023;
- r) “ **External reporting** ”: the communication, written or oral, of information on violations pursuant to Legislative Decree 24/2023, submitted via the external reporting channel;
- s) “ **Internal reporting** ”: the communication, written or oral, of information on violations pursuant to Legislative Decree 24/23, submitted via the internal reporting channel ;
- t) “ **Follow-up** ”: the action taken by the Supervisory Body, as the person responsible for managing the Reports, to assess the existence of the reported facts, the outcome of the investigations and any measures adopted;
- u) “ **Disciplinary System** ”: the set of disciplinary measures applicable in the event of the Information on the violation being reported being well-founded;
- v) “ **Violations** ”: behaviors, acts or omissions that harm the public interest or the integrity of the private entity and which consist of:

²For the purposes of the “ *whistleblowing* ” legislation, the protection provided by Legislative Decree 24/2023 also applies in the following cases: when the employment or collaboration relationship has not yet begun, if information on violations was acquired during the selection process or other pre-contractual phases; during the probationary period; after the termination of the legal relationship if information on violations was acquired during the relationship itself.

³By way of example, a) dismissal, suspension, or equivalent measures; b) demotion or failure to promote; c) change of duties, change of workplace, reduction of salary, modification of working hours; d) suspension of training or any restriction of access to it; e) negative marks of merit or negative references; f) the adoption of disciplinary measures or other sanctions, including financial ones; g) coercion, intimidation, harassment, or ostracism; h) discrimination or otherwise unfavorable treatment; i) failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion; l) failure to renew or early termination of a fixed-term employment contract; m) damage, including to the individual's reputation, particularly on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income; (n) improper listing on the basis of a formal or informal sectoral or industrial agreement, which may result in the person being unable to find employment in the sector or industry in the future; (o) early termination or cancellation of a contract for the supply of goods or services; (p) cancellation of a license or permit; (q) requesting psychiatric or medical assessments.

- i. Violations of national legal provisions: this category includes criminal, civil, administrative or accounting offences other than those specifically identified in the following categories ⁴.
- ii. The predicate offenses for the application of Legislative Decree no. 231/2001, as well as violations of the organizational and management models provided for in the aforementioned Legislative Decree no. 231/2001, not attributable to violations of EU law as defined below. It should be noted that these violations do not constitute predicate offenses for the application of Legislative Decree no. 231/2001 and pertain to organizational aspects of the entity adopting them.
- iii. Violations of European legislation. These include:
 - Offences committed in violation of EU legislation listed in Annex 1 to Legislative Decree no. 24/2023 and all national provisions implementing it (even if the latter are not expressly listed in the aforementioned Annex): offences relating to public contracts; financial services, products and 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; protection of privacy and personal data protection and security of networks and information systems (for example, so-called "environmental crimes" such as the discharge, emission or other release of hazardous materials into the air, soil or water or the unlawful collection, transportation, recovery or disposal of hazardous waste);
 - Acts or omissions that harm the financial interests of the European Union (Article 325 TFEU combating fraud and illegal activities affecting the EU's financial interests) as identified in EU regulations, directives, decisions, recommendations, and opinions (for example, fraud, corruption, and any other illegal activity related to European Union expenditure);
 - Acts or omissions affecting the internal market that undermine the free movement of goods, persons, services, and capital (Article 26(2) TFEU). This includes violations of EU rules on competition, state aid, and corporate tax, as well as arrangements designed to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax legislation;
 - Acts or behaviors that undermine the object or purpose of European Union provisions in the areas listed above. This category includes, for example, abusive practices as defined by the case law of the Court of Justice of the European Union (for example, a company operating in a dominant position on the market).

5. THE REPORTS COVERED BY THIS PROCEDURE

This procedure concerns Reports of Information on Violations, which may concern:

- i. information, including reasonable suspicions, regarding Violations committed, of which the Reporter has become aware in the Work Context;

⁴ This category of offenses applies exclusively to public sector entities as defined in art. 2, paragraph 1, letter p) of Legislative Decree 24/2023.

- ii. information, including well-founded suspicions, regarding Violations which, on the basis of concrete evidence, could be committed and of which the Reporter has become aware in the Work Context;
- iii. elements regarding conduct aimed at concealing such violations.

However, information on reportable or reportable violations does not include clearly unfounded news, information that is already entirely in the public domain, or information acquired only on the basis of unreliable rumours or hearsay (so-called " *corridor gossip* ", as defined by the ANAC Guidelines approved with Resolution no. 311 of 12 July 2023).

6. SCOPE OF APPLICATION

6.1. Company perimeter

This document applies to the Recipients as identified above in the " *Definitions* " chapter referred to in point 4.

The Report Management process illustrated in this document does not refer to:

- i. commercial communications;
- ii. information of a merely defamatory nature that does not relate to the Violations referred to in Legislative Decree 24/2023;
- iii. disputes, claims or requests related to a personal interest of the Reporting Person or of the person who filed a complaint with the judicial or accounting authority which relate exclusively to their individual employment relationships, or which are inherent to their employment relationships with hierarchically superior figures ⁵.

Generally, the Company encourages its employees to resolve any work-related disputes, where possible, through dialogue, even informal, with their colleagues and/or their direct manager.

The provisions regarding the exercise of the right of employees to consult their representatives or trade unions, as well as protection against unlawful conduct or acts committed as a result of such consultations, remain in force.

GFM is also committed to combating, by all means, cases of discrimination, violence, harassment, or mobbing. Such reports and other violations of the Code of Ethics that fall outside the scope of the "Corporate Perimeter," even if received through the " *Whistleblowing* " reporting channel, will be forwarded to the relevant Department and handled according to existing internal procedures. The same applies to the possibility of reporting workplace safety issues, as provided for by current procedures and applicable company collective bargaining agreements, always ensuring confidentiality and informing the reporting party.

⁵ This procedure also does not apply to reports: (i) of violations where they are already mandatorily regulated by the European Union or national acts indicated in Part II of the Annex to Legislative Decree 24/2023 or by national acts that implement the European Union acts indicated in Part II of the Annex to Directive (EU) 2019/1937, even if not indicated in Part II of the aforementioned Annex; and (ii) of violations relating to national security, as well as procurement relating to aspects of defence or national security, unless such aspects fall within the relevant secondary legislation of the European Union.

6.2. Reporting Channels⁶

6.2.1. Internal reporting

Pursuant to the law, the Company has activated its own internal reporting channel pursuant to Legislative Decree 24/2023, which guarantees the confidentiality of the identity of the reporting Person, the Person involved and any person mentioned in the Report, as well as the content of the Report and the related documentation ⁷.

The management of this channel is entrusted to the Supervisory Body (henceforth also “ODV”), which as of today is composed of:

- Dr. Sergio Valerio Giovanni Locatelli, in the role of President of the ODV (external consultant);
- Dr. Elena Fenili (internal member, GFM SpA employee);
- Dr. Luca Pasinetti (internal member, GFM SpA employee).

The members of the Supervisory Board have been duly appointed, trained, and authorized by the Company to process the personal data ⁸contained in internal reports. The Supervisory Board, as identified, meets the requirements of autonomy and independence and has an adequate budget.

The provider of the IT platform used for the reporting channel (EQS “Integrity Line”) is appointed as Data Controller pursuant to Art. 28 of the GDPR.

In the event that the Report concerns one of the members of the ODV, please refer to point 6.5. “*Special cases*”.

Reports can be made through the following methods ⁹:

- i. in written form, electronically, via the EQS “Integrity Line” platform; or in written form, via ordinary mail or express courier or registered mail, to the attention of the Supervisory Body at the address: Via G. Natta, 5 – 24030 Mapello (BG), marked “*confidential and personal*” without indicating the sender. The report in electronic form must be placed in two sealed envelopes, including in the first the identifying data of the Reporting Person together with an identity document; in the second, the subject of the Report; both envelopes must be placed in a third bearing on the outside the wording “confidential to the Supervisory Body”, and
- ii. Orally via telephone lines or voice messaging systems, or by requesting a face-to-face meeting with the Supervisory Body within 15 days. In such cases, with the prior consent of the Reporting Person, the internal Report may be documented, including by the Supervisory Body, by recording it on a device suitable for storage and listening, or by preparing a specific transcript. If unrecorded telephone lines or voice messaging systems are used, or in the event of a face-to-face meeting, upon listening, the designated staff will document the message received in a detailed report that the Reporting Person can verify, correct, and confirm with their signature. If a report is prepared, the Reporting Person must confirm it with their signature.
- iii. Upon request, the reporting person is also heard through a paper procedure through the acquisition of written observations and documents.

⁶Legislative Decree 24/2023, in addition to the reporting or disclosure channels indicated in this procedure, provides in any case the possibility for the Reporting Person to file a complaint with the judicial or accounting authorities.

⁷ Confidentiality is guaranteed not only to the identity of the whistleblower, but also to any other information or element of the report whose disclosure could directly or indirectly lead to the whistleblower's identity.

⁸This authorization is deemed to be provided pursuant to Article 29 of Regulation (EU) 2016/679 and Article 2- *quaterdecies* of Legislative Decree 196/2003.

⁹Internal reports submitted to parties other than those referred to in this procedure will be forwarded, within 7 days, to the competent party, with the reporting person being notified of the forwarding at the same time.

6.2.2. External reporting

The Reporting Person may also submit an external Report to the National Anti-Corruption Authority (ANAC), albeit only on a residual basis and, specifically, only when the following conditions are met:

- a) the internal reporting channel adopted by the Company is not active or is active but does not comply with the provisions of Legislative Decree 24/2023;
- b) the internal report submitted according to the terms set out in this procedure has not had any follow-up;
- c) the Reporting Person has well-founded and proven reasons to believe that, if he or she were to make an internal Report, it would not be followed up effectively, or it could give rise to the risk of Retaliation;
- d) the Reporting Person has reasonable grounds to believe that the violation may constitute an imminent or manifest danger to the public interest;
- e) if the type of conflict has not been regulated in this internal procedure, if the Supervisory Body managing the internal Report is in a situation of conflict of interest with respect to a specific Report (for example, as the reported party or the Reporting Party).

The external reporting channel established by ANAC guarantees, like the aforementioned internal channel defined by the Company, the confidentiality of the identity of the reporting Person, the content of the Report, the Person involved and any persons involved in the Report ¹⁰.

External reports are made in writing via the IT platform made available by ANAC on its website in the " *Whistleblowing* " section. Reports may also be made orally via telephone lines or voice messaging systems, or, at the request of the reporting person, through a face-to-face meeting scheduled within a reasonable timeframe; the methods for accessing these channels and the related instructions are specified by ANAC on its website.

6.2.3. Public disclosure

The Reporting Person is also guaranteed the possibility of making a Public Disclosure if one of the following conditions is met:

- i. the Reporting Person has previously made an internal and/or external Report and has not received feedback within the timeframes set out in this procedure regarding the measures envisaged or adopted to follow up on the Report;
- ii. the Reporting Person has reasonable grounds to believe that the Violation may constitute an imminent or manifest danger to the public interest;
- iii. the Reporting Person has reasonable grounds to believe that the external Report may entail the risk of Retaliation 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 a well-founded fear that the person receiving the Report may be in collusion with the perpetrator of the Violation or involved in the violation itself.

¹⁰Confidentiality is guaranteed even when the Report is submitted through channels other than those provided for by Legislative Decree 24/2023 or reaches personnel other than those responsible for handling Reports, to whom it is in any case forwarded without delay. External Reports submitted to a party other than ANAC are forwarded to the latter within 7 days of receipt, with the Reporting Person being notified of the forwarding.

6.3. Sending the Report

6.3.1. Internal reporting

Anyone wishing to submit a written internal report using electronic means may do so via the online platform available at the following address: <https://gfm.integrityline.com>, or, if in electronic form, submit it by attaching the specific form in Annex 1 in the manner indicated above.

The online instructions and the form in Annex 1 provide the Reporting Person with a guided process, structured through a series of questions and requests for supporting information, aimed at describing the situation being reported in a clear, precise, and detailed manner.

Anyone wishing to make a verbal Report may do so via the voice messaging system available on the platform at the following address: <https://gfm.integrityline.com> or by requesting a direct meeting with the Supervisory Body set within 15 days by contacting the Supervisory Body through the platform: <https://gfm.integrityline.com>.

Reports must be as detailed as possible. The reporting person is encouraged to attach all documentation supporting the reported facts, refraining from undertaking independent analysis and investigation.

6.4. Receipt and analysis of internal reports

Reports are managed, first and foremost, by the Supervisory Body, which treats internal reports received confidentially, adopting verification methods suitable for protecting the identity of the reporting person as well as that of the people involved, as well as any information on the violations received and any elements of the report.

6.4.1. Preliminary check

All internal reports received are subject to verification by the Supervisory Body (ODV) to determine whether the communication received is accompanied by the information necessary to preliminarily verify its validity and to initiate subsequent in-depth investigations.

The Supervisory Body undertakes to provide the Reporting Person with acknowledgement of receipt within 7 days of receiving the internal Report.

The Supervisory Body diligently follows up on the reports received, maintaining dialogue with the reporting person, from whom it requests information/additions if necessary.

Without prejudice to the confidentiality of the information received, in the preliminary verification activities the Supervisory Body may avail itself of the support of other Company structures or specialized consultants, expressly authorized to process and bound by confidentiality, based on the specific skills required in relation to the content of the Report being verified (subject to compliance with confidentiality and the provisions of Legislative Decree 24/2023).

At the end of the preliminary verification, the ODV can archive the internal reports:

- a) which fall outside the definition of Violation provided in point 4 letter v) of this procedure or come from subjects other than the Recipients ¹¹;
- b) not detailed;

¹¹ In these cases, the Report may be handled according to the procedures already in place for such violations, where relevant, by notifying the Reporting Party.

- c) which do not allow for a sufficiently detailed picture to be obtained to be able to initiate further investigations to ascertain their validity;
- d) manifestly unfounded.

If the report does not fall within the scope of the "Corporate Perimeter," as defined in point 4, letter v) of this procedure, or if it comes from parties other than the Recipients, even if received through the "Whistleblowing" reporting channel, it will be forwarded to the relevant Department and handled according to existing internal procedures, always ensuring privacy. The same applies to the possibility of reporting workplace safety matters, as provided for by current procedures and applicable company collective bargaining agreements.

In the investigation and verification phase, the ODV:

- a) proceeds, if necessary, to hear the reporting person or to acquire further documents;
- b) ensures the impartiality, fairness and accuracy of the analysis and evaluation of internal reporting;
- c) ensures the confidentiality of the information collected and the confidentiality of the name of the Reporting Person, where provided; as well as
- d) undertakes not to use internal reports beyond what is necessary to adequately follow up on them.

The ODV, without the express consent of the Reporting Person, may not reveal the identity of the Reporting Person and any other information from which such identity may be deduced, directly or indirectly, to persons other than those authorised to receive or follow up on the Reports (persons expressly authorised to process such data pursuant to the current legislation on privacy and the processing of personal data).

6.4.1.1. Reports that fail the preliminary check

Internal reports that do not pass the preliminary stage are archived by the Supervisory Body (ODV) in a dedicated logical space on the IT platform, using encryption tools or a paper-based system that guarantees the confidentiality of the reporting person's identity and, in any case, of the information and elements related to the report, accessible only to members of the Supervisory Body (ODV).

The confidentiality of such Reports is guaranteed through the following provisions:

- a) creation of a shared folder with password-restricted access limited to ODV members only;
- b) encryption of the most sensitive documents by subjecting them to passwords known only to the members of the ODV;
- c) non-traceability of the Reporting Party at the time the connection is established to internal reporting channels (on the IT platform or network devices - such as company PCs, internet connections, etc.);
- d) tracking of the ODV's activity, in order to avoid the improper use of data relating to the Report.

In any case, internal reports that do not pass the preliminary phase are recorded in the Report Book or are left for audit trail in the "EQS Integrity Line" system if the report was made using this tool.

The Supervisory Body records the internal Report and the actions taken following its receipt in the Report Book, always ensuring the confidentiality of the identity of the reporting Person and the Persons involved, as well as any additional information received. The Report Book is maintained by the Supervisory Body itself and is accessible only to those authorized by the Company.

The Supervisory Body will respond to the Reporting Person within a reasonable timeframe and, in any case, within 30 days of the date of acknowledgement of receipt of the Report regarding failure to complete the preliminary phase. This is without prejudice to any subsequent action by the Company regarding the reasons for failure.

The provisions of the following point 7 remain unchanged with reference to (i) Reports that prove to be unfounded and made with intent or gross negligence; (ii) Internal reports that are manifestly opportunistic and/or unfounded and/or made for the sole purpose of harming the person reported or other individuals and any other hypothesis of improper use or intentional exploitation of the Company subject to this procedure, which may be a source of liability, in disciplinary proceedings and in other competent bodies.

Therefore, when the criminal liability of the Reporting Person for the crimes of defamation or slander is ascertained, even by a first instance judgment, or civil liability in cases of intent or gross negligence, the protections provided for in this procedure are not guaranteed and a disciplinary sanction is imposed on the Reporting Person (where applicable pursuant to the law) ¹².

6.4.1.2. Reports that pass the preliminary check

If the preliminary verification carried out by the Supervisory Body has established that the internal report, adequately detailed and supported by evidence from which it was possible to deduce its validity, constitutes conduct that may be punishable even only under disciplinary action, the Supervisory Body shall:

- a) Provide immediate and reasoned information (via an anonymized report) to the functions/bodies responsible for applying the disciplinary and sanctioning system, as per point 7 "Disciplinary and Sanctioning System," so that they can self-determine the disciplinary action to be taken, while also respecting the principles of specificity, immediacy, and immutability of the complaint if the Persons involved are employees of the Company ¹³. As part of their self-determination, these functions/bodies may conduct further investigations and checks by requesting the support of the Supervisory Body, which remains the sole contact for the Reporting Person and guarantees confidentiality. Where, following further investigations and checks, these functions/bodies:
 - a) they deem the conduct to be uncontestable, they immediately notify the Supervisory Body so that the latter can archive the Report, noting it in the Report Book or in the "EQS Integrity line" audit trail (also with timely recording of all the activities carried out in this regard) always guaranteeing the confidentiality of the identity of the Reporting Person and of the Persons involved;
 - b) If they deem the conduct relevant, they will take appropriate action and, in the case of employees, initiate disciplinary proceedings in accordance with the procedures set forth in Article 7 of Law 300/1970 and the National Collective Bargaining Agreement. The Person involved must be provided with appropriate privacy information pursuant to Article 14 of the GDPR (Annex 3) within one month of the start of the processing, consistent with the confidentiality requirements of the Reporting Person and the protection of the investigation.
- b) Inform the management body or the Board of Directors for their respective assessments, highlighting the subject of the Report, the outcome of the investigation, any activation of the

¹²For further details, please refer to the provisions of Article 8.2 of this Regulation and Article 16 "Conditions for the Protection of the Reporting Person" of Legislative Decree 24/2023.

¹³In such circumstances, disciplinary measures are applied in compliance with the provisions of Article 7 "Disciplinary Sanctions" of Law 300 of 1970 (Workers' Statute) and the National Collective Bargaining Agreement.

sanctions system, as well as any corrective actions aimed at avoiding similar situations in the future.

The ODV undertakes to process the internal Reports received within a reasonable time and to provide Feedback ¹⁴on the matter (in the same manner used by the Reporting Person or, if specified otherwise, in the manner chosen by the Reporting Person) to the Reporting Person within three months from the date of the acknowledgement of receipt or, in the absence of such acknowledgement, within three months from the expiry of the seven-day period starting from the submission of the Report.

6.5. Special cases

6.5.1. Reports regarding members of the ODV

If the internal Report containing serious, precise and consistent elements concerns one or more members of the Supervisory Body, or the latter are in any case subjects involved or interested in the Report or are themselves reporting subjects, the same must be sent to the Board of Directors, by hand delivery to the Chief Executive Officer of any supporting documentation or by sending a registered letter with return receipt or express courier addressed to the Company's headquarters, in Via G. Natta, 5 – 24030 Mapello (BG) with the following wording: " *Confidential Personnel for the attention of the Chief Executive Officer Mr. Manuel Cortinovis* ".

The Board of Directors, after consulting with the Board of Statutory Auditors, jointly assesses whether the internal report is accompanied by the information necessary to preliminarily verify its validity and initiate subsequent in-depth investigations. The Board of Directors will then proceed with the investigation, also drawing on the company's expertise and, if necessary, specialized consultants, always respecting the confidentiality required by law and the provisions of this document.

The investigation follows the process described in this procedure.

The Board of Directors' decision is formalized through a written resolution.

6.5.2. Anonymous reports

The Company allows the Reporter to submit the Report anonymously, provided it is detailed and contains suitable and sufficient information to pass the preliminary check.

The Company will process and retain anonymous Reports according to the general Report retention criteria described above, thus making it possible to trace the Report, in the event that the person or entity filing the report informs ANAC that they have suffered retaliatory measures due to that anonymous report or complaint.

In cases of anonymous Reporting, Judicial Reporting, or Public Disclosure, if the Reporting Person is subsequently identified and has suffered retaliation, the protective measures provided for in the event of Retaliation apply.

7. DISCIPLINARY AND SANCTIONING SYSTEM

In cases where, from the investigations carried out, the information on violations that are the subject of the internal report is found to be well-founded, the body/function responsible for activating the

¹⁴ This may consist of communicating the closure of the case, initiating an internal investigation and, where applicable, disclosing the related findings, the measures taken to address the issue raised, or referring the case to a competent authority for further investigation.

Sanctions System decides what type of sanction to impose on the individuals who committed the violation.

Depending on the qualification of the Person involved and the legal and contractual framework of the Employees, the Disciplinary System is activated by:

- a) Chief Executive Officer (CEO) or HR Director if a non-managerial employee;
- b) Board of Directors if he/she is a manager or in reference to the dissolution or revocation of a collaboration relationship between a top manager and the Company;
- c) Shareholders' Meeting, if he/she is a Mayor;
- d) Shareholders' Meeting, if he/she is a Director;
- e) Board of Directors, if it is a member of the ODV;
- f) Chief Executive Officer (CEO) if a third party.

The sanction must be proportionate and graduated according to the seriousness of the offense, in compliance with the regulations applicable from time to time.

If the Reporting Person is jointly responsible for the Violations, they will be treated more favorably than other co-responsible persons, consistent with the Violation committed and applicable law. In any case, the protection guaranteed by Legislative Decree 24/2023 safeguards the Reporting Person from direct and indirect retaliatory reactions resulting from their report and the application of disciplinary sanctions resulting therefrom. However, it does not establish a general exemption for all disciplinary violations committed by the employee, alone or in concert with others. At most, the employee's diligent repentance and collaborative efforts during the fact-finding phase can be taken into account when determining the appropriate sanction.

The identity of the Reporting Person and any other information that may directly or indirectly reveal such identity cannot be disclosed without their express consent ¹⁵. The Reporting Person's free, specific, unequivocal, and informed consent will be collected in writing and retained by the Supervisory Body in the documentation relating to the Report.

In the context of disciplinary proceedings, the identity of the Reporting Person may not be disclosed if the disciplinary charge is based on investigations that are separate and additional to the report, even if resulting from it. If the complaint is based, in whole or in part, on the report and knowledge of the Reporting Person's identity is essential for the accused's defense, the report may be used for disciplinary purposes only with the express consent of the Reporting Person to disclose their identity. The Supervisory Body, if it has not already done so, will therefore obtain consent from the Reporting Person, informing the Reporting Person, in writing, of the reasons for the need to disclose their identity or other information from which it may potentially be inferred, in order to fully follow up on the Report, or for the purposes of the disciplinary proceedings, including for the defense of the Person involved.

If the Reporting Person refuses to provide consent to the disclosure of his or her identity, the internal Report cannot be used for disciplinary purposes, without prejudice to its follow-up for further verification activities and any corrective actions based on separate and additional investigations.

This procedure does not affect the criminal and disciplinary liability of the Reporting Person in the event of a defamatory or libelous Report pursuant to the Criminal Code and Article 2043 of the Civil Code.

The behavior of those who make reports with intent or gross negligence that prove to be unfounded is also punishable.

Any forms of abuse of this procedure, such as manifestly opportunistic and/or unfounded internal reports and/or reports made with the sole purpose of harming the person reported or other

¹⁵ This procedure also protects the identity of the Person involved and of the persons mentioned in the Report until the conclusion of the proceedings initiated based on the Report, in compliance with the same guarantees provided for the Reporting Person.

individuals, and any other instance of improper use or intentional exploitation of the Company subject to this procedure, will give rise to liability in disciplinary proceedings and other competent bodies. Therefore, when the criminal liability of the Reporting Person for the crimes of defamation or slander is ascertained, even by a first-instance judgment, or civil liability in cases of willful misconduct or gross negligence, the protections provided for in this procedure are not guaranteed and the Reporting Person is subject to a disciplinary sanction (where applicable pursuant to the law) ¹⁶. Legislative Decree 24/2023 also provides that in such cases the ANAC may apply an administrative pecuniary sanction of between 500 and 2,500 euros to the reporting person, unless a criminal conviction has been made, even in the first instance, for the crimes of defamation or slander ¹⁷. The following also constitute disciplinary offenses, sanctioned in accordance with the Disciplinary System and applicable National Collective Bargaining Agreements, based on their severity: (i) committing Retaliation; (ii) violating the confidentiality obligations set forth in this procedure; (iii) obstructing, even attempted, the submission of a Report; (iv) failing to manage the internal reporting channel in compliance with Legislative Decree 24/2023. For such conduct, ANAC may also apply the administrative pecuniary sanctions referred to in Article 21, paragraph 1, letters a) and b), of Legislative Decree 24/2023.

8. PROTECTION OF THE REPORTING PERSON AND APPLICATION OF PROTECTIVE MEASURES

8.1. Prohibition of retaliation

Any form of retaliation against the reporting person is prohibited.

Pursuant to the law, the prohibition of retaliation and, in any case, the protective measures provided for by Legislative Decree 24/2023 against the Reporting Person also apply:

- a) to the Facilitators;
- b) to persons in the same work context as the reporting person, the person who filed a complaint with the judicial or accounting authority or the person who made a public disclosure and who are linked to them by a stable emotional or kinship relationship within the fourth degree;
- c) to work colleagues of the Reporting Person or of the person who has filed a complaint with the judicial or accounting authority or made a Public Disclosure, who work in the same Work Context as the Reporting Person and who have a habitual and ongoing relationship with that person;
- d) to entities owned by the Reporting Person or by the person who filed a complaint with the judicial or accounting authority or who made a public disclosure or for which the same persons work, as well as to entities operating in the same work context as the aforementioned persons.

The reasons that led the Reporting Person to Report or denounce or publicly disclose are irrelevant to his or her protection.

As anticipated in the previous point 6.5.2., the conditions provided for protection also apply in cases of Reporting (internal and/or external) or complaint to the judicial or accounting authority or anonymous public disclosure, if the Reporting Person has subsequently been identified and has suffered retaliation, as well as in cases of reports submitted to the competent institutions, bodies and agencies of the European Union, in accordance with the conditions set out in this procedure (as well as Article 6 of Legislative Decree 24/2023).

Any retaliation in the workplace against reporting persons must be reported to ANAC, which in turn

¹⁶ For further details, please refer to the provisions of Article 16 " *Conditions for the Protection of the Reporting Person*" of Legislative Decree 24/2023.

¹⁷ Art. 21 paragraph 1 letter c) Legislative Decree 24/2023

will inform the National Labor Inspectorate for the measures under its jurisdiction: it is important that those who have suffered retaliation do not forward the report to anyone other than ANAC so as not to undermine the protections guaranteed by Legislative Decree 24/2023, first and foremost confidentiality.

As required by the Regulation for the management of external reports and for the exercise of ANAC's sanctioning power pursuant to Legislative Decree 24/2023, approved with Resolution No. 301 of July 12, 2023, communications and complaints that may lead to sanctioning proceedings governed by the aforementioned Regulation are forwarded to ANAC through the form on the IT platform available on ANAC's institutional website (<https://www.anticorruzione.it/-/whistleblowing> - Section 5 of the Form), which uses encryption tools and guarantees the confidentiality of the whistleblower's identity and the content of the communication and complaint, as well as the related documentation.

Acts taken in violation of the prohibition of Retaliation are null and void and the Reporting Person who has been dismissed due to the Report (internal and/or external), Public Disclosure or complaint to the judicial or accounting authority has the right to be reinstated in the workplace¹⁸.

In judicial or administrative proceedings, or in any case, out-of-court disputes concerning the determination of prohibited conduct, acts, or omissions against the Reporting Person, it is presumed that such conduct or acts were committed as a result of the Report (internal and/or external), the Public Disclosure, or the complaint to the judicial or accounting authorities. By law, the burden of proving that such conduct or acts were motivated by reasons unrelated to the Report (internal and/or external), the Public Disclosure, or the complaint lies with the party who committed them (e.g., the Employer).

Furthermore, in the event of a claim for compensation submitted to the judicial authority by the Reporting Person, if the Reporting Person demonstrates having made a Report (internal and/or external), a Public Disclosure, or a complaint to the judicial or accounting authority and having suffered damage, it is presumed, unless proven otherwise, that the damage is a consequence.

According to the ANAC Guidelines approved with Resolution No. 311 of July 12, 2023, not all individuals recognized as protected against retaliation can benefit from the reversal of the burden of proof; specifically, those individuals who - having a qualified connection with the whistleblower, whistleblower, or public disseminator - could suffer retaliation due to that connection are excluded from this benefit.

These include facilitators, people from the same work context, co-workers, and even legal entities in cases where they are entities owned by the whistleblower, whistleblower, public disseminator, or entities in which the whistleblower works, or entities operating in the same work context. Therefore, the ordinary burden of proof falls on all of these individuals if they complain of having suffered retaliation or harm.

8.2. Conditions for the application of protection from retaliation

In accordance with the ANAC Guidelines approved with Resolution No. 311 of July 12, 2023, the application of the anti-retaliation protection regime provided for by the Decree is subject to the following conditions and requirements:

- the Reporting Person has reported, denounced or made the Public Disclosure based on a reasonable belief that the Information on the reported, disclosed or denounced Violations is truthful and falls within the objective scope of application of the decree;
- the Report or Public Disclosure was made in compliance with the provisions of Legislative

¹⁸ The judicial authority shall adopt all measures, including temporary ones, necessary to ensure the protection of the legal situation being enforced, including compensation for damages, reinstatement in the workplace, an order to cease conduct committed in violation of the prohibition of retaliation, and a declaration of nullity of any acts adopted in violation of Legislative Decree 24/2023.

Decree 24/2023;

- a relationship of consequence is necessary between the Report, Disclosure and complaint made and the retaliatory measures suffered.

Furthermore, the whistleblower loses the protections provided if the following is ascertained:

- even with a first instance sentence, the criminal liability of the reporting person for the crimes of defamation or slander or where such crimes are committed with the complaint to the judicial or accounting authority
- civil liability for the same reason for intent or gross negligence.

8.3. Limitations of liability pursuant to art. 20 of the Legislative Decree. 24/2023

Pursuant to the law, a Reporting Person shall not be punishable for revealing or disseminating information on Violations covered by the obligation of confidentiality, other than that set forth in Article 1, paragraph 3 of Legislative Decree 24/2023 ¹⁹, or relating to the protection of copyright or the protection of personal data, or for revealing or disseminating information on Violations that harm the reputation of the Person involved or reported, when, at the time of disclosure or dissemination, there were reasonable grounds to believe that the disclosure or dissemination of such information was necessary to reveal the Violation, and the Report (internal and/or external), the Public Disclosure, or the complaint to the judicial or accounting authorities was made in compliance with the provisions of Legislative Decree 24/2023. In such cases, any further liability, including civil or administrative liability, is also excluded.

Unless the act constitutes a crime, the Company or the Reporting Person shall not incur any liability, including civil or administrative liability, for the acquisition of or access to Information on Violations. In any case, criminal liability and any other liability, including civil or administrative liability, is not excluded for behaviors, acts, or omissions not related to the Report (internal and/or external), the complaint to the judicial or accounting authority, or the Public Disclosure, or which are not strictly necessary to reveal the Violation.

9. CONSERVATION AND ARCHIVING

The Supervisory Body is informed of any sanctions imposed in response to internal and external reports. The relevant company function (HR Office) archives the documentation relating to the disciplinary and sanctioning process.

The Supervisory Body therefore archives the documentation relating to the internal Report, received electronically, and its investigation, in a dedicated logical space that guarantees - with encryption tools - or in analog form, the confidentiality of the identity of the Reporting Person and the elements of the Report, accessible only to the members of the Supervisory Body.

Any paper documentation, as well as the Report Book kept by the internal Supervisory Body, must be kept by the Supervisory Body itself and made accessible only to persons authorised by the Company ²⁰.

¹⁹ Article 1, paragraph 3 of Legislative Decree 24/2023 provides: “ *The application of national or European Union provisions regarding: a) classified information; b) legal and medical professional secrecy; c) confidentiality of the deliberations of judicial bodies remains unchanged .* ”

²⁰ We hereby declare that a specific impact assessment has been carried out regarding the risks to the rights and freedoms of Reporters with regard to the processing of their personal data and that the logical, legal, and technical tools described in this Procedure for the submission, management, and retention of Reports have been found to be suitable for guaranteeing the confidentiality of the individuals involved as well as the correct and legitimate processing of personal data carried out in connection with the Reports.

Internal reports received are retained for the time necessary to process them and, in any case, no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set forth in Article 12 of Legislative Decree 24/2023 and the principle set forth in Articles 5, paragraph 1, letter e), of Regulation (EU) 2016/679 and 3, paragraph 1, letter e), of Legislative Decree 51/2018.

The ODV may, however, maintain a Reporting Register in which the personal data relating to the Reporting Person, the Persons involved, indicated as possibly responsible for the unlawful conduct, as well as those who are involved in various capacities in the internal Reporting must be anonymized

²¹.

10. REPORTING

The Supervisory Body reports to the Board of Directors every six months on the proper functioning of its internal reporting systems, including aggregated information on the results of its activities and the follow-up given to internal reports received.

In preparing this report, the Supervisory Body is required to comply with the provisions of the legislation on the protection of the identity of the Reporting Person and the applicable legislation on the protection of personal data.

11. RESOLUTIONS OF THE ODV

The Supervisory Board meeting is valid if at least two members are present. Resolutions are adopted with the favorable vote of at least two members present; in the event of a tie, the Supervisory Board President's vote prevails.

The Supervisory Body is convened by the President or one of its members and, specifically, by the person who has received notice of the receipt of the Report.

The meeting must be called promptly, approximately within 3 days of receiving the Report and in any case within a timeframe sufficient to ensure that the Reporting Person receives acknowledgement of receipt within 7 days.

The meeting may also be held via video conference.

12. APPROVAL, ENTRY INTO FORCE AND TRANSMISSION OF THE PROCEDURE

This procedure was approved on October 14, 2026, after consulting the representatives or trade unions referred to in Article 51 of Legislative Decree 81/2015, and enters into force on the same date.

For anything not regulated herein, please refer to Legislative Decree 24/2023.

This procedure and clear information on the channel, procedures, and prerequisites for submitting internal and external Reports are displayed and made easily visible in the workplace, published in a dedicated section of the Company's website, and made accessible to Recipients who do not frequent the workplace.

²¹The retention of anonymized data does not violate the provisions of Article 12 of Legislative Decree 24/2023 regarding personal data retention periods and complies with Article 5, paragraph 1, letter e), of Regulation (EU) 2016/679.

Attached:

- **Attachment 1** - Reporting Form;
- **Annex 2** - Privacy Policy - Reporting Person.
- **Annex 3 - Privacy Policy - Person involved and third parties mentioned in the Report.**

For any further clarification, please read the ANAC guidelines: <https://www.anticorruzione.it/-/whistleblowing> or contact the *Whistleblowing Manager* at the email address: odv@gfm.com.