

WHISTLEBLOWING MANAGEMENT POLICY

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Coesia S.p.A. - Whistleblowing Management Procedure	
Scope: Coesia S.p.A. Italian Subsidiaries	Date: September 2023
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Parte I – GENERAL

1. Purpose

Coesia S.p.A. (hereafter also referred to as “Coesia” or “the Company”) and its Italian subsidiaries, in accordance with its values, the standards of conduct set forth in the Group’s Code of Ethics, and its commitment to follow and comply with current regulations, shall adopt the following procedure for handling reports through adequate channels to provide all persons acting in the name or on behalf of Coesia with a comprehensive tool for reporting violations of the Group’s Code of Ethics, Legislative Decree 24/2023, and Legislative Decree n. 231/2001.

The present document intends to define all stages of reporting, from receipt, assessment, analysis to management. It defines roles and responsibilities within the process, the subject matter of the reports, the persons entitled to report and the management process to be followed by the Whistleblower and the Company.

2. Scope of Application

This procedure applies to Coesia S.p.A. and its Italian subsidiaries, including all individuals envisaged by D. lgs. 24/2023, that is those who work in the name and on behalf of Coesia, such as executives, managers, collaborators and contractors under fixed-term contracts, or contingent workers, temporary workers, volunteers and trainees, shareholders as well as third parties such as self-employed workers, freelancers, and consultants.

Coesia is committed to extending the scope of application also to the recipients of the Group’s Code of Ethics, not included in the Legislative Decree. 24/2023 such as clients, suppliers, partners, and agents who may also report potential violations or submit proposals.

3. General Principles

The persons involved in the activities regulated by the procedure hereby must operate in compliance with the regulatory, organizational, and power system based on the following principles:

Confidentiality

The Whistleblower’s identity, and that of any third party involved, must not be disclosed, without prior consent, to anyone not involved in the management of the report. It can be disclosed, for instance, only when strictly necessary in following through with the report, and in any case, limited to the personnel authorized to handle the report, as outlined in this procedure. In such case, the Whistleblower must be promptly informed and express their consent.

Transparency

The activities regulated by this procedure must guarantee total transparency in carrying out one’s duties and provide a full and truthful informative report.

Impartiality, independence and professionalism

Reports must be handled in a way that always ensures and maintains the necessary terms of objectivity, competence and professionalism.

Truthfulness and validity

Reports must refer to news which can be substantiated by the Whistleblower on reasonable grounds.

Prohibition of Retaliation to protect whistleblowers and other parties involved.

Retaliation is forbidden if the whistleblower reports by acting in good faith and on reasonable grounds. Such principle is applicable under the Article n. 17 par. 4 of the Legislative Decree n. 24/2023, which regulates and prohibits retaliation against anyone who reports possible violations, and aims to protect all persons concerned by the Report from any unfair or harmful treatment.

4. Glossary

<i>Coesia S.p.A.</i>	Coesia S.p.A. and its Italian Subsidiaries
<i>Ethics Committee</i>	Independent and autonomous Committee headed by the President of Coesia.
<i>Facilitator</i>	The person who assists the Whistleblower in the whistleblowing process and who can operate either within or outside the work environment and whose assistance must be kept confidential. By way of example, it could be the Whistleblowing Manager, the direct supervisor, the HRBP, a colleague, a third party, or any other figure inside or outside the organization. Just like the Whistleblower, the Facilitator is protected based on the paragraph “11. Confidentiality”.
<i>Whistleblowing Manager</i>	Whistleblowing Manager who takes on the role of Internal Channel Manager under art.4 par. 2 Legislative Decree n. 24/2023.
<i>Supervisory Body</i>	An autonomous body given the responsibility of overseeing and monitoring illicit conduct under Legislative Decree n. 231/2001.
<i>Person Concerned</i>	A natural or legal person or corporate body who is referred to in the Whistleblower’s Report as a party responsible for the suspected violation or as a party involved.

<i>Retaliation</i>	Any kind of adverse conduct, action or omission, including threats, against a person who has submitted a Report and that may cause him or her, direct or indirect, unfair damage.
<i>Whistleblower</i>	Any person reporting a suspected violation or illegal practice, of which they have become aware in the context of their work-related activities.
<i>Whistleblowing Report</i>	A communication, in written or oral form or via in-person meeting, regarding a suspected violation.
<i>Proposals</i>	New ideas and suggestions for improvement.
<i>Third Parties</i>	<ul style="list-style-type: none"> - Employed workers, temporary agency workers, self-employed workers, collaborators, freelancers, consultants; - Individuals whose work-based relationship is yet to begin and have acquired information on breaches during the recruitment process; - Former employers or partners of Coesia S.p.A. or its Subsidiaries who have become aware of violations during their work-based relationship with the Company.
<i>Violations under art. 2 Legislative Decree n. 24/2023</i>	<p>Conduct, actions or omissions that harm the company and may consist of:</p> <ul style="list-style-type: none"> - administrative, accounting, civil or criminal offences; - offences falling under the acts of European Union (EU) or national law; - acts or omissions that harm the financial interests of the European Union; - violation of EU rules on competition and state aid; - breach of national laws with regard to corporate liability under, for instance, in Italy, Legislative Decree n. 231/2001.
<i>Violations (other)</i>	Behaviours, acts and omissions that jeopardize the company and that consist in, by way of example and not limited to, violations, or induction to a violation of laws and/or regulations, breaches of the values or principles of the Code of Ethics and of the company policies and/or rules (i.e., procedures, internal communication, orders of service).

Part II – REPORTING PROCESS

5. Roles and Responsibilities

Whistleblowing Manager

The Whistleblowing Manager takes on the role of Internal Channel Manager under art.4 par. 2 Legislative Decree n. 24/2023.

The Whistleblowing Manager is responsible for the following activities:

- a) notify the Whistleblower and acknowledge receipt of the report within seven days of receipt;
- b) maintain communication with the whistleblower and, where necessary, ask for additional information;
- c) diligently follow up on the report;
- d) provide feedback on the report within 3 months from the notice of receipt or, if no notice was sent, within 3 months from the expiry of the seven-day period after the report was made;
- e) provide clear information on the Internal Channel, procedures and conditions for internal reporting, as well as on the channel, procedures, and condition for external reporting.

In particular, the Whistleblowing Manager, in carrying out his or her duties, is responsible for the following operations:

- monitoring the whistleblowing process, guarantee regular updates on its status and that of the reporting channels, where appropriate;
- diligently following up on reports received, coordinating all individuals involved in the whistleblowing management process;
- uploading all reports submitted in non-written form on the digital platform;
- assessing suitability of the report, with the support of the Ethics Committee and outside consultants for reports under Legislative Decree 24/2023 and violations of the Code of Ethics, and the support of the Supervisory Body for reports under Legislative Decree. 231/2001, to verify any manifest inconsistency or generic content;
- activating internal investigation, in case of admissible reports, with the support of other managers responsible of other internal functions and/or outside consultants, identifying the parties responsible for conducting investigation, assessing the accuracy and reliability of the reported facts;
- providing feedback to the Whistleblower as specified in Legislative Decree n. 24/2023.

Ethics Committee

The Ethics Committee is an independent and autonomous body, chaired by the President of Coesia.

The Committee provides support and guidance to the Whistleblowing Manager especially in the stages of admissibility, assessment, and closure of the report.

6. Reporting

The following **violations** can be the subject of reporting **under art. 2 of Legislative Decree n. 24/2023**:

- 1) administrative, accounting, civil or criminal offenses that are not referred to in parts 3), 4), 5) and 6);
- 2) illegal conduct that is relevant under Legislative Decree n. 231 of June 8, 2001, or violations of the Organisational, Management and Control Model adopted by the Company in compliance with the aforementioned legislation and that are not referred to in parts 3), 4), 5) and 6);
- 3) violations under EU or national law as indicated by the Legislative Decree n. 24/2023, that is by national acts that constitute implementation of the European Union acts set out in the Annex to Directive (EU) 2019/1937, although not mentioned in the Annex to Legislative Decree n. 24/2023, in the following areas: public procurement; 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 well-being; public health; consumer protection; privacy and personal data protection and network and information system security;
- 4) acts or omissions that harm the financial interests of the Union as referred to in Article 325 of the Treaty on the Functioning of the European Union detailed in the applicable secondary legislation of the European Union;
- 5) acts or omissions concerning the internal market rules, set forth in Article 26, paragraph 2, of the Treaty on the Functioning of the European Union, including breaches of European Union regulations on competition and state aid rules, as well as violations of the internal market rules, connected with breaches of corporate tax law or the mechanisms that aim at obtaining a tax advantage that nullifies the object or purpose of the applicable corporate tax law;
- 6) acts or conduct that nullify the object or purpose of the measures set forth in the Union Acts in the areas indicated in parts 3), 4) and 5).

Information regarding violations must pertain to conduct, acts or omissions acquired by the whistleblower in the context of their work-related activities.

The following are not included in the violations to be reported through the channels provided:

- claims, disputes or requests in relation to a reporting person's personal interest, such as issues concerning exclusively one's personal work relationship with senior colleagues;
- information that is clearly unsubstantiated;
- information that is already available in the public domain;
- information acquired on the basis of unreliable speculations or gossip (i.e. "rumour mill").
- violations already regulated by other European Union or National Acts (as set forth in "Part II Annex to the Decree n. 24/2023");

- breaches of national security and procurement relating to defense or national security, unless such matters are governed by the relevant European secondary /derivative legislation of the European Union.

To be admissible, the report must not only meet the above objective prerequisites, but should also be as thorough and circumstantiated as possible.

In particular, it must be extremely clear regarding:

- the time and place in which the reported fact occurred;
- the description of the fact;
- the personal details or other elements that allow to identify the person concerned in the reported situation.

It is also useful to attach any documentation that may substantiate the reported facts.

Lastly, in order to increasingly foster a culture of transparency and implement the process of continuous improvement initiated by Coesia, whistleblowing channels can also be used to signal any conduct that is not in line with the principles set out in the Group's Code of Ethics and collect recommendations, suggestions or positive feedback regarding any aspect worthy of notice, notwithstanding that the latter instance covers a broader spectrum than the law.

7. Whistleblower

Violations under art. 2 of the Legislative Decree n. 24/2023 can be reported by:

- all collaborators of Coesia S.p.A. and its Italian Subsidiaries, as well as workers under fixed-term contract and contingent workers, volunteers and trainees;
- top management personnel, individuals covering administrative, managerial or representative roles, or who exercise management and control of business activities;
- employees, self-employed collaborators, agency and temporary workers, freelancers, independent contractors, consultants;
- Individuals whose work-based relationship is yet to begin and have acquired information on breaches during the recruitment process;
- former collaborators or partners of Coesia S.p.A. and its Italian Subsidiaries who have become aware of breaches during their previous work-based relationship with the Company.

Reports of other violations relating to the Group's Code of Ethics and proposals can be submitted by all recipients of the Code such as, for example, clients, suppliers and, in general, other stakeholders.

Individuals who submit a report in accordance with the Legislative Decree n. 24/2023, as described in this document, are granted the rights of protection provided by the legislation itself and set out in Part III.

In line with the principles of its Code of Ethics, Coesia is committed to guaranteeing protection from any form of retaliation, discrimination or penalization to all individuals who report other violations or make proactive suggestions. It stands firm that the Company may use the testimony of the person making the report, also alongside other testimonies, should it be deemed necessary to protect the Company in the appropriate venue, including judicial.

8. Whistleblowing Channels

Coesia S.p.A. and its Italian Subsidiaries have established an internal channel for submitting reports of violations under art. 2 Legislative Decree n. 24/2023, including illicit conduct relevant under Legislative Decree n. 231 and breaches of the Group's Code of Ethics. Reports can be submitted as follows:

FOR ALL VIOLATIONS (under ART. 2 Legislative Decree n. 24/2023, and Legislative Decree n. 231 and the CODE OF ETHICS)

- **in written form** through the online digital reporting platform, available by computer at the following link coesia.ethicspoint.com or by cell phone at coesia.navexone.eu, or by scanning the QR code below:



- **verbally**, through telephone hotlines, (available 24 hours a day, 7 days a week) as indicated in the platform, where the toll free number is available.

(the above two channels enable anonymous reporting)

- or contacting the Whistleblowing Manager
- directly at the following number +39 051 6423355;
- **by an in-person meeting** upon the reporting person's written request to be addressed to codicetico@coesia.com, within a timeframe of 15 working days.

SOLELY FOR BREACHES UNDER ART.2 OF THE LEGISLATIVE DECREE n.24/2023

The Whistleblower has the possibility, under certain circumstances¹, to also use an external reporting channel to the Italian Anticorruption Authority (ANAC), or make a public disclosure that is via the

¹ The external reporting channel at ANAC can be activated under the following conditions:

- the internal channel is not active or does not guarantee confidentiality to the Whistleblower;
- the report made through the internal channel has not been followed up by the Whistleblowing Manager within the prescribed time limits or has not been properly addressed;
- the reporting person has reasonable grounds to believe that the report made through the internal channel will not be effectively followed up or will result in 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 (es. health and safety or environmental danger).

Public disclosure (through the press or electronic media or otherwise through publicly available means that can reach a high number of people) can only be used in the following cases:

- the reporting person has already made an internal or external report that has not been followed up on within the time limits provided for;

media or electronic means or by any other means that can anyhow reach a large audience. It is to be understood that, should the reporting person intentionally disclose his/her identity through online platforms or social media channels or in any other form, protection of confidentiality, as from chapter 11 of this document, is not applicable.

SOLELY FOR BREACHES OF THE CODE OF ETHICS OR PROACTIVE PROPOSALS

Subject to all the specifications set out in this Whistleblowing Management Policy, collaborators of Coesia and its Italian subsidiaries may use other internal reporting channels:

- if comfortable, any concern can be initially reported to a **direct supervisor**, who **will contact Human Resources**, always maintaining confidentiality;
- alternatively, it is possible to contact the **HRBP**;
- finally, it is also possible to contact the Ethics Committee directly by sending a signed email to codicetico@coesia.com

or a signed letter by ordinary mail to the following address:

Coesia, Comitato Etico, Via Battindarno 91, 40133 Bologna.

When using the reporting channels described above, Whistleblowers can rely on the support of a natural person who can assist them throughout the process, taking on the role of Facilitator.

In particular, Whistleblowers can autonomously appoint a Facilitator, who can be identified in a person inside and/or outside the Company whom they consider of help. By way of example, and not limited to, the role of the Facilitator can also be appointed the Whistleblowing Manager, a direct manager, the HRBP, a colleague, a third party, or any other individual internal or external to the organization.

The internal channel outlined in this paragraph may also be used with regard to reports of violations of the Code of Ethics or proposals.

9. Whistleblowing Management

Internal reports received through the channels described in the previous paragraph shall be managed as described below.

When the Whistleblowing Manager receives a report in a non-written form, he or she is required to upload it on the dedicated digital platform.

-
- 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, in the case of external reporting, there is a risk of retaliation or of not being effectively addressed due to specific circumstances, such as those where evidence may be concealed or destroyed, or where the people who received the report may be involved with the perpetrator of the breach or in the violation.

a. Receiving Reports

This activity is carried out and coordinated by the Whistleblowing Manager, who must inform the Whistleblower, within 7 days of receipt, that the Report has been received.

The person filing the report can access this informative report through an automatic email notification sent via the NAVEX digital reporting platform, with every status update of the report. Through a direct link to the digital platform enclosed in the email reply, the Whistleblower can access the Report and check report status or he or she can reply to the email or the letter sent.

If the Report is received by a person outside the identified and authorized reporting channels, it must promptly be transmitted to the competent person, within 7 days of its receipt, concomitantly notifying the Whistleblower.

b. Assessing admissibility of the report

This activity is carried out by the Whistleblowing Manager with the support of the Ethics Committee and the external consultants for reports under Legislative Decree n. 24/2023 or connected with the Code of Ethics and the Supervisory Body for reports relevant under Legislative Decree n. 231/2001.

This stage is aimed at:

1. Verifying that the report has been submitted in accordance with this document;
2. Assessing the content of the report to verify whether it meets the prerequisites to fall under one of the cases outlined in this document (violations under Legislative Decree n. 24/2023, Legislative Decree n. 231/2001, and reporting of breaches of the Code of Ethics, or proposals);
3. Activating communication with the Whistleblower and requesting, when necessary, further details.

Therefore, the Whistleblowing Manager, with the support of the Ethics Committee or the Supervisory Body, based on the compliance of the report with this document, assesses its admissibility and notifies the Whistleblower. The Whistleblower can access the updated information through an automatic email notification sent from the digital reporting platform at every update in the report status. Through the link provided via the automatic email response, the Whistleblower can access the report to verify report status. Alternatively also via email or letter, when the latter have been chosen as communication channels.

After verifying the eligibility of the report, the Whistleblowing Manager, with the support of the Ethics Committee, identifies the subjects who need to be involved in the subsequent investigation phase, and provides them with the minimum information necessary to start the investigation.

In this regard, it is specified that:

- if the report concerns a violation under art. 2 of the Legislative Decree n. 24/2023 or a breach of the Code of Ethics or a proposal, the report will be handled by the Whistleblowing Manager and the Ethics Committee, in line with the provisions of set forth in the paragraphs “investigation” and “closure” in this document;
- if the report concerns a violation of Legislative Decree n. 231/2001, the report will be handled by the Supervisory Board.

c. Investigation

This stage is carried out and coordinated by different parties, based on the nature of the report:

- Reports that may be attributable to a case governed by Legislative Decree n. 24/2023 and the Code of Ethics or proposals: the Whistleblowing Manager and the Ethics Committee are in charge of the investigation. The Whistleblowing Manager must activate the investigation process and make sure that it is carried out within the set timeframe;
- Reports that may be attributable to a case governed by Legislative Decree n. 231/2001: the Supervisory Body is responsible for managing the investigation while the Whistleblowing Manager must activate the investigation process and make sure that it is carried out within the set timeframe.

The party in charge of the investigation shall ensure that the inspection activities are carried out. In this stage it is possible to obtain operational and technical support from functions and/or external consultants who were previously identified.

The investigation is aimed at carrying out targeted inspections that allow to identify, verify and assess all possible elements that might substantiate the reported events.

The investigation phase must be unbiased towards the Functions involved, the Whistleblower and the subject of the Report, and must be conducted without prejudice. In addition, the subject of the violation must be granted the right to respond and receive assistance.

This stage must be carried out in compliance with the following principles, by way of example and not limited to:

- the objective and scope must be clearly defined and documented;
- the investigation must guarantee the safety and confidentiality of its content and documentation, as well as that of the people involved;
- personal data must be processed in line with data protection regulations (section "5. Principles");
- all communication must be clear and unambiguous;
- the Whistleblower must be regularly informed about report progress.

In addition, Human Resources are involved in the investigation phase to ensure the implementation of protection measures in favour of the Whistleblower and the reported subject, and to assess the impact from a Labour-law viewpoint.

d. Closure of the case

This phase is carried out and coordinated by the Whistleblowing Manager, with the support of the Ethics Committee or the Supervisory Body, based on the subject of the report and the people in charge of the Company's internal functions and/or external consultants involved in the previous stages.

The closure determines the conclusion of the process.

A case is closed when no further action is deemed necessary and there is no need to carry out further investigation.

In this stage, the following steps must be taken into consideration:

- conclusion of the reporting process and follow-up on its outcome;

- action in response to any indication (for instance, disciplinary actions);
- communication to the personnel in charge of support and protection of the Whistleblower and other involved parties;
- identification of possible protective measures underway;
- collecting suggestions from the Whistleblower and other parties involved;
- archiving of all documents collected in the previous stages.

If during the assessment phase, the violation has been verified, the Head of the Function affected by the reporting (which ultimately proved to be well-founded), may be involved to define an action plan for the areas and processes implicated in the report.

In addition, the Whistleblowing Manager, in agreement with the Ethics Committee, and with the support of the functions and/or consultants involved in the investigation, will proceed to:

- formalize the measures to address the violation;
- identify the person designated to verify the correct application and monitoring of the such measures;
- receive constant updates on the effectiveness of the monitoring measures;
- define disciplinary actions, when applicable;
- involve competent authorities, if necessary.

At the end of the closing phase, the Whistleblowing Manager, in agreement with the Ethics Committee or the Supervisory Body, based on the nature of the report, and with the support of the functions and/or consultants involved, provides feedback on the report. The Whistleblower can access this information through an automatic email notification sent from the digital reporting platform at every update in the report status. Through the link provided by the digital platform, via the reply to the email or letter that was sent, the Whistleblower can verify the report status.

The feedback produced in the above mentioned communication must provide information on the outcome of the report and, in particular, by way of example, such communication can be

- archived for lack of substance, sufficient evidence or other reasons;
- concluded with the necessary measures taken to correct the issue raised;
- referred to a competent authority for further investigation.

The Whistleblowing Manager must provide a first feedback, even if only interlocutory, to the Whistleblower within 3 months after receipt of the report was acknowledged (or if no acknowledgement was sent, within 3 months after the expiry of the seven-day period following the submission of the report).

10. Prohibition of retaliation

The Whistleblower is protected by any **retaliation**, both direct or indirect, against him/her and any **form of discrimination** for reasons that are, directly or indirectly connected to the Report. Retaliation can be any form of detrimental conduct as listed below:

- a) dismissal, suspension or equivalent measures;
- b) demotion or non-promotion;

- c) alteration in work assignments, workplace, working hours or remuneration;
- d) withholding of training or any limitation to it;
- e) adverse personal records or negative performance assessment;
- f) imposition or administering of disciplinary actions or other sanctions, including fines;
- g) coercion, intimidation, harassment, or ostracism;
- h) discrimination or any disadvantageous or unfair treatment;
- i) failure to convert a temporary employment contract into a permanent one, when legitimately expected by the worker;
- l) non-renewal or early termination of a term contract;
- m) damages, also reputation damage, particularly on social media, or financial prejudice, including the loss of financial opportunities and income;
- n) blacklisting on the basis of a formal or informal sectoral or industrial agreement, which may hinder the person from finding future employment in the sector or industry;
- o) early termination or cancellation of contracts for the supply of goods or services;
- p) cancellation of a license or permit;
- q) request for psychiatric or medical examination.

Part III – FINAL CLAUSES

11. Confidentiality

The identity of the Whistleblower and any other information which may, directly or indirectly, reveal his or her identity cannot be disclosed, without prior notice and consent, to individuals other than those in charge of receiving and following up reports, expressly authorized to process such data.

In particular, regarding the disclosure of the Whistleblower's identity, the Decree (art.16) provides for the following confidentiality measures:

- During criminal proceedings, the identity of the reporting person shall be kept confidential within the cases and limits established by Article 329 of the Italian Code of Criminal Procedure (*paragraph 3*);
- In proceedings before the Court of Auditors, the identity of the Whistleblower cannot be disclosed until conclusion of the investigation phase (*paragraph 4*);
- In disciplinary proceedings, the identity of the reporting person cannot be disclosed, when the allegation of the disciplinary charge is based on separate and additional investigations, albeit resulting from the report. When the charge is based, in whole or in part, on the report and

the identity of the reporting person is necessary for the defense of the accused, the report can be used for disciplinary proceedings only prior to the Whistleblower's consent to disclose his or her identity (*paragraph 5*);

- the Whistleblower will be given notice in written form of the reasons for disclosure of confidential data, in the circumstances referred to in paragraph 5, second part, as well as in the internal and external reporting procedures herein referred, when the disclosure of the identity of the Whistleblower and the information referred to in paragraph 2 is required for the defense of the concerned person (*paragraph 6*).

Confidentiality is guaranteed also:

- in case of verbally submitted internal or external reporting, over the telephone or upon the Whistleblower's request, by an in-person meeting with the Whistleblowing Manager;
- when the report is made following other procedures than those established in accordance with the Decree or is submitted to individuals other than the one designated to handle reports;
- to the reporting person and all other persons involved in the reporting procedure.

Confidentiality is also ensured through the use of dedicated encryption tools.

12. Continuous Improvement Process

In addition to what is stated above in this procedure, the Company will be responsible to define any recommendations regarding the necessary corrective action in the areas and business processes affected by the reports. Likewise the company will monitor implementation status of the aforementioned actions, to activate a virtuous process of continuous improvement within the internal control system.

13. Record Keeping and traceability

All reports must be processed in compliance with General Data Protection Regulations.

In the case of a report made orally or by in-person meeting, the report must be adequately documented by:

- recording of the conversation or meeting, upon the Whistleblower's authorization;
- transcript or minutes of the meeting to be checked and signed by the Whistleblower for approval;
- documenting of the report on the IT reporting platform by the Whistleblowing Manager, following the conclusion of the conversation or meeting.

All documentation related to the report must be retained throughout the entire report management process. The requirement to store all information produced while handling the report is valid for 5 years from the date of the communication to the whistleblower of the final outcome of the reporting procedure.

Upon termination, all documents must be deleted.

14. Training and Communication

Coesia, in accordance with its values and conduct principles set out in the Group's Code of Ethics, commits to providing adequate measures to raise awareness of the reporting system among staff and third parties, including its procedure, the stages of the process and the prerequisites to be met.

Training of staff and collaborators is carried out at the time of recruitment and shall be updated regularly, at every significant regulatory change, based on the roles and involvement within the whistleblowing process.

Such internal training must focus on the following aspects:

- the collaborator's contribution to the effectiveness of the whistleblowing system;
- how to recognize violations;
- how to report a suspected violation and to whom;
- how and to whom ask questions regarding the whistleblowing system;
- how to contribute to preventing, avoiding and protecting oneself against harmful conduct;
- protective measures in place for those who use the whistleblowing system;
- the impact of failure to report a breach and its potential consequences;
- explain the consequences of conduct that does not comply with the whistleblowing procedure, such as, for instance, knowingly false reports or detrimental behaviours, which may justify disciplinary measures.

Furthermore, all personnel must understand that:

- the whistleblowing procedure does not replace the assumption of responsibility by managers for their work environment;
- the whistleblowing management system shall not replace national legal obligations to report to competent authorities, where appropriate.

Moreover, to allow Third Parties to be aware of this procedure, a special information notice is provided in the contractual documentation, to be accepted by acknowledgement upon signing the contract.

Information regarding the channels, procedures and conditions for internal or external reporting, or public disclosure shall be clearly shared with all individuals entitled to make a report.

The above mentioned information shall be displayed and made highly visible and accessible in the workplaces and on the Coesia website and those of its Subsidiaries in the dedicated section.

15. Disciplinary Measures

Coesia, in compliance with the provisions of the Legislative Decree n. 24/2023, may define disciplinary measures in case the Whistleblower is found, including by first instance court judgement, criminally liable for slander or defamatory reports, in any case for the same crimes committed with the complaint to the judicial or accounting authority, or their civil liability, for the same offenses in case of willful misconduct or gross negligence.

Moreover, these individuals will not be granted the rights of protection provided by the legislation itself.

16. Rules and Regulations and Privacy

The following form the main governance framework and provide relevant legal references that are the basis of this procedure and its processes:

- Directive EU n. 1937/2019 on the protection of persons who report breaches of Union Law and related national transpositions;
- Legislative Decree. n. 24/2023 “Implementation of Directive (EU) 2019/1937 of the European Parliament and of the European Council of 23 October 2019, on the protection in favour of whoever reports breaches of Union Law and containing provisions regarding protection of whoever reports breaches of national law”;
- other national laws regarding the Organisational, Management and Control Model (under Legislative Decree n. 231/2001 “Corporate Liability of Legal Entities”)
- ISO 37002 International “Whistleblowing management systems”;
- EU Regulation n. 679/2016 “General Data Protection Regulation – GDPR” and national transpositions.

All personal data must be processed in compliance with the EU Regulation n. 679/2016 its national transpositions.

All personal data which is not relevant to the management of a specific report should not be collected. If collected incidentally, such data must be deleted without undue delay.

Processing of personal data shall be managed in compliance with the EU Regulation 2016/679 (GDPR), as well as with all other applicable laws and regulations.

When the report is not made anonymously, the Whistleblower’s personal data will be processed alongside the data of the concerned person/s and/or possible third parties, as well as all additional information collected during the preliminary investigation, to assess and verify the validity of the report.

Coesia S.p.A. is the holder of the data and will in all cases act as autonomous data controller.

If the exercise of the rights recognized by Section III of GDPR may entail an actual and concrete prejudice to the confidentiality of the Whistleblower’s identity, and the possibility to effectively verify the validity of the report, or gather the necessary evidence may be compromised, it is possible to limit or delay such exercise, in accordance with the applicable law dispositions. In no case whatsoever the concerned person or third parties may exercise the right of access to obtain information on the identity of the Whistleblower.

Coesia S.p.A. reserves the right to assess, on a case-by-case basis, the specific circumstances and conditions that make it appropriate to duly inform the person concerned on the conclusion of the verification procedure, to avoid abuse and ensure protection of the person’s rights.