

# Whistleblowing policy

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## 1 Preamble

The process of reporting ("whistleblowing") facts that violate laws, Codes, Policies and Company Procedures is an act of responsibility that Marsilli wishes to encourage. It is therefore paramount to create an environment where each stakeholder feels protected should they wish to report actions, facts and behaviour that violate applicable regulations, Company Codes, Policies and Procedures. This Policy is thus a tool aimed at promoting a transparent and responsible organisational environment that guarantees respect for legality and fosters behaviour consistent with the principles of integrity and ethics of the Marsilli Group.

Reports must be handled fairly and impartially, with the aim of assessing and verifying the reported violations and, if necessary, taking remedial actions.

## 2 Aim of the Policy.

The purpose of this Policy is to ensure that the following steps are managed within the reporting process:

- submission of the report by the reporting person;
- receipt of the report, its assessment and verification through appropriate investigations;
- activation of any remedial actions and measures.

Confidentiality of the persons involved must be guaranteed at all stages.

## 3 Regulatory framework.

This Policy is based on and implements principles established in the following documents already adopted:

- Marsilli Code of Ethics.
- Internal Policies and Procedures.
- Model 231 (for the Italian company that have adopted it).
- Laws and regulations of the country where the Group company is based.

## 4 Recipients and field of application

This Policy is addressed to all the companies of the Group. The recipients are the Supervisory Board, if any, the highest Administrative Bodies, or other specifically appointed Control Bodies, hereinafter referred to as "the Competent Body".

## 5 Whistleblowing policy

This Policy provides guidance and principles to be applied in the following steps concerning the reporting of violations:

- Submission of the report.
- Receipt and preliminary assessment of the report.
- Verification of the report through appropriate investigation.
- Activation of any remedial actions and measures.

### 5.1 SUBMISSION OF THE REPORT BY THE REPORTING PERSON.

Marsilli must ensure that any violations can be reported while protecting the confidentiality of the reporting person. To this end Marsilli, in addition to ensuring reporting through ordinary channels, provides a secure communication channel consisting of a dedicated IT platform that allows for the submission of a report in confidential mode, without the need for registration by the reporting person. The communication channel, therefore, gives the reporting person the option to maintain absolute anonymity.

The reporting person, through this platform, will be able to choose the Group company and then the Competent Body to which to send the report, to choose whether to send a report in oral or written form, and finally, whether to make themselves identifiable or remain anonymous.

After submitting the report through the platform, the whistle-blower will obtain unique and secure codes to follow the verification and management process of their report made by the Competent Body, within the said platform. The platform will also enable internal communication between the Competent Body and the reporting person. Absolute confidentiality will be guaranteed at all stages. In this regard, it is recommended to send reports through the aforementioned IT platform, as it is specially structured to ensure confidentiality and possible anonymity of the reporting person, at all stages of the process.

#### 5.1.1 Prerequisite for reporting

The prerequisites for submitting a report are:

- Violations for applicable laws and regulations.
- Violations of Model 231 (for Italian companies that have adopted it).
- Violations of internal Policies, Codes and Procedures.

In the report, the whistle-blower should provide details of the facts according to the following indications:

- describe the facts in detail;
- specify where the violation occurred (if known and relevant);
- specify the dates when the violation occurred or was detected (if known and relevant);
- specify the people involved in the violation (if known);
- attach any relevant document or picture (if available).

## **5.2 RECEIPT AND PRELIMINARY ASSESSMENT OF THE REPORT BY THE COMPETENT BODY**

The report shall be preliminarily subject to the following evaluations by the Competent Body:

- if the report has detailed and verifiable content and refers to relevant facts or conduct, the investigation phase of the report itself will be initiated;
- if the report does not fulfil the above point, it will not be acted upon and will be closed as manifestly unfounded and evidence deficient. Reports found to have been made for purely defamatory purposes will be reported to the relevant authorities.

The Competent Body shall provide the whistle-blower with acknowledge of receipt of the report within a reasonable period of time from the date of receipt, and in any case within a period of time that complies with the law of the country of the receiving company.

## **5.3 VERIFICATION OF THE REPORT THROUGH APPROPRIATE INVESTIGATION BY THE COMPETENT BODY**

If the report has detailed and verifiable contents and refers to relevant facts or conduct, the Competent Body shall carry out the necessary investigations to establish whether the reported facts and conduct are justified, if necessary by contacting the whistle-blower and/or the persons involved in the report.

Communication between the Competent Body and the whistle-blower shall be implemented by means of modalities and channels agreed between the two parties, ensuring the confidentiality requested by the reporting person.

## **5.4 ACTIVATION OF ANY REMEDIAL ACTIONS AND MEASURES BY THE COMPETENT BODY**

At the end of the investigation phase, the Competent Body will implement the appropriate measures and remedial actions it deems most appropriate to prevent the recurrence of the facts, including the possible reporting to the relevant authorities, in accordance with the rules in force in the country where the Group company is based.

The Competent Body will provide the reporting person with feedback on the investigation, measures and remedial actions, within a reasonable time from the date of acknowledgment of receipt of the report, and in any case before the deadline set by the law of the country of the receiving company.

## **6 Guarantees and safeguards**

The identity of the whistle-blower and any other information which might reveal, directly or indirectly, his or her identity, shall be covered by the utmost confidentiality, unless provided for by the whistleblowing laws in force in the country where the Group company is based, if more stringent.

At all stages of the Procedure, the identity of persons directly or indirectly involved in the report must also be protected.

The whistle-blower may not be subject to retaliation because of reporting wrongful acts or alleged such facts by him/her.

## **7 Personal data protection**

The processing of personal data in the context of reports and communications with the Competent Body will be carried out in compliance with the Personal Data Privacy Policy and applicable data protection legislation of the country where the Group company is based, where more stringent.

Personal data that is not useful for processing the specific report shall not be collected and, if accidentally collected, shall be deleted immediately.

Where required by the applicable law of the reference country, the Group company will provide the reporting person with due information on the processing of personal data.

## **8 Operating procedures**

Group companies will have to transpose the principles set out in this Policy in their specific operating procedures. The procedures shall provide the whistle-blower with all the necessary information for reporting violations in the various channels available, as well as informing him/her of the possible safeguards in case of retaliation. The procedures shall take into account any legal provisions in force in the country where the Group company is based.