



Whistleblowing Guidelines

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REV	DATE	Reason for revision	ISSUED	VERIFIED	APPROVED
00	15 December 2023	FIRST ISSUE	RGQ	SB	Board of Directors
01	31 January 2025	UPDATE ON THE COMPOSITION OF THE REPORTING MANAGEMENT COMMITTEE	RGQ	SB	Board of Directors



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Introduction

PM Oil & Steel S.p.A. (hereinafter the “Company”) adopts this procedure regarding reports (hereinafter the “Procedure”), in compliance with the provisions of Legislative Decree No. 24 of 10 March 2023, implementing European Directive 1937/2019, known as the Whistleblowing Decree (hereinafter the “Decree”).

Distribution: company website, HR portal

1. Purpose and scope

The purpose of this Procedure, as set out in Legislative Decree 24/2023, is:

- to define the principles, rules and operating procedures for the management of whistleblowing reports (hereinafter “Reports” or “Report”) regarding unlawful conduct or irregularities (actual or alleged on reasonable grounds), such as, for example, breaches of:
 - o Code of Ethics;
 - o Organisational and Management Model pursuant to Legislative Decree 231/01;
 - o Regulations, Directives and internal Procedures adopted by the Company;
 - o Civil and criminal laws applicable to the Company ;
- to establish the boundaries regarding the roles and responsibilities of those responsible for handling Reports, as explicitly referred to in the Decree, as well as to protect the Reporting Person.

The Procedure applies to all Reports.

2. Definitions

The Procedure uses the following definitions/acronyms:

- *Whistleblower*: a term referring to the individual who makes a Report or publicly discloses information regarding violations observed within their workplace . The purpose of the Report must be to identify and prevent risks and situations detrimental to the organisation to which they belong, and to uphold the collective public interest;
- *Reporting*: the communication, in writing or orally, of information regarding breaches;
- *Internal report*: the communication, in writing or orally, of information regarding violations, submitted via the internal reporting channel referred to in Article 4 of Legislative Decree 24/2023;
- *External reporting*: the communication, in writing or orally, of information regarding violations, submitted via the external reporting channel referred to in Article 7 of Legislative Decree 24/2023;
- *Public disclosure or to disclose publicly*: to make information on breaches public via the press or electronic media or, in any case, via means of dissemination capable of reaching a large number of people;
- *Facilitator*: a natural person who assists a Whistleblower in the reporting process, working within the same workplace, and whose assistance must be kept confidential;
- *Workplace*: current or past work or professional activities through which, regardless of the nature of such activities, a person acquires information about breaches in relation to which they may risk retaliation in the event of a report or public disclosure to the judicial or accounting authorities;
- *Reported Person or Person Involved*: the natural or legal person mentioned in the internal or external Report or in the public disclosure as the person to whom the breach is attributed or as a person otherwise implicated in the breach reported or publicly disclosed;



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- *Reporting Officer/Manager*: the individual or committee formally appointed by the Board of Directors to receive and manage internal reports;
- *Retaliation*: any conduct, act or omission, even if merely attempted or threatened, carried out as a result of the Report, the complaint to the Judicial or Accounting Authority, or public disclosure, and which causes or may cause the Reporting Person or the person who lodged the complaint, directly or indirectly, unjust harm;
- *Follow-up*: the set of actions undertaken as part of the management of the Reporting channel to assess the validity of the reported facts, the outcome of the analysis and any actions to be taken;
- *Feedback*: communication to the Whistleblower of information regarding the follow-up that is being given or is intended to be given to the Report;
- *Investigation*: any activity carried out by *the Reporting Officer/Manager* deemed appropriate, including the personal hearing of the Whistleblower and any other individuals who may provide information on the reported facts, in accordance with the principles of impartiality and confidentiality.

3. Subject matter

Article 2 of Legislative Decree 24/2023 clarifies that 'violations' refer to conduct, acts or omissions that harm the public interest or the integrity of the public administration or private entity and which consist of:

- 1) administrative, accounting, civil or criminal offences not falling under points 3), 4), 5) and 6);
- 2) unlawful conduct as defined in Legislative Decree No. 231 of 8 June 2001, or breaches of the organisational and management models set out therein, which do not fall under points 3), 4), 5) and 6);
- 3) offences falling within the scope of application of the European Union or national acts listed in the annex to Legislative Decree 24/2023 or of national acts implementing the European Union acts listed in the annex to Directive (EU) 2019/1937, even if not listed in the Annex to Legislative Decree 24/2023, relating to the following sectors: public procurement; financial services, products and markets; and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; the protection of privacy and personal data, and the security of network and information systems;
- 4) acts or omissions affecting the financial interests of the Union as referred to in Article 325 of the Treaty on the Functioning of the European Union, as specified in the relevant secondary legislation of the European Union;
- 5) acts or omissions relating to the internal market, as referred to in Article 26(2) of the Treaty on the Functioning of the European Union, including infringements of European Union competition and State aid rules, as well as infringements concerning the internal market linked to acts that breach corporate tax rules or arrangements designed to obtain a tax advantage that undermines the object or purpose of the applicable corporate tax legislation;
- 6) acts or conduct that undermine the object or purpose of the provisions set out in Union acts in the areas referred to in points 3), 4) and 5).

Furthermore, actions taken in breach of the Code of Ethics and the internal procedures governing the Company's activities may be reported.

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Legislative Decree 24/2023 also sets out what may NOT be the subject of a Report, public disclosure or complaint:

- Disputes, claims or requests linked to a personal interest of the Reporting Person or of the person who has lodged a complaint with the judicial or accounting authorities, which relate exclusively to their own individual employment or public service relationships, or which concern their employment or public service relationships with their superiors.
- Reports of violations where these are already mandatorily regulated by the European Union or national acts listed in Part II of the Annex to Legislative Decree 24/2023, or by national acts implementing the European Union acts listed in Part II of the Annex to Directive (EU) 2019/1937, even if not listed in Part II of the Annex to Legislative Decree 24/2023.
- Reports of breaches relating to national security, as well as contracts concerning defence or national security aspects, unless such aspects fall within the relevant secondary legislation of the European Union.

Information on reportable or actionable breaches does not include reports that are manifestly unfounded, information that is already entirely in the public domain, or information obtained solely on the basis of unreliable rumours or hearsay (so-called 'corridor gossip').

4. Conditions for Reporting

The Procedure governs, as required by law, the reporting of offences and breaches committed or that may be committed on the basis of concrete evidence:

- within the context of the employment relationship (this term also covers legal relationships other than employment relationships in the strict sense);
- where the legal relationship has not yet commenced, if the information regarding the breaches was obtained during the selection process or at other pre-contractual stages;
- during the probationary period;
- following the termination of the legal relationship if the information regarding the breaches was obtained during the course of that relationship.

5. Source of Reports

The Procedure, in compliance with Legislative Decree 24/2023, governs reports originating from:

- employees, including those engaged in:
 - ✓ part-time, intermittent, fixed-term, agency, apprenticeship or ancillary work (whose employment relationship is governed by Legislative Decree No. 81/2015);
 - ✓ occasional work (pursuant to Article 54-bis of Decree-Law No. 50/2017, converted by Law No. 96/2017);
- self-employed workers
 - ✓ under a contract for specific work (Article 2222 of the Civil Code);
 - ✓ under a collaboration arrangement (as referred to in Article 409 of the Code of Civil Procedure), such as agency relationships, commercial representation and other collaboration arrangements involving a continuous and coordinated provision of work, predominantly personal in nature, even if not of a subordinate nature;
 - ✓ under a collaboration arrangement involving exclusively personal, continuous work, the manner of performance of which is organised by the client;



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- collaborators who carry out their work for entities that supply goods or services or that carry out works on behalf of the Company;
- freelancers and consultants working for the Company;
- volunteers and trainees, whether paid or unpaid, who carry out their activities at the Company;
- shareholders and persons holding administrative, managerial, supervisory, oversight or representative roles within the Company, even if such roles are exercised de facto;
- persons holding administrative, managerial, supervisory, oversight or representative roles.

The protective measures provided for in Chapter III of Legislative Decree 24/2023 also apply:

a) to facilitators;

b) to persons in the same working environment as the Whistleblower, the person who has filed a complaint with the Judicial or Accounting Authority, or the person who has made a public disclosure, and who are linked to them by a stable emotional bond or kinship up to the fourth degree;

c) to the 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 workplace as them and who have a regular and ongoing relationship with that person;

d) entities owned by the person making the report, complaint or public disclosure, or for which such persons work, and entities operating in the same working environment as those persons;

e) entities where the Whistleblower, complainant or person making a public disclosure works;

f) entities operating in the same working environment as the Whistleblower, complainant or person making a public disclosure.

6. Procedure for making internal reports

- To be admissible, the report must contain:

1. *the Whistleblower's* identification details, as well as contact details to which subsequent updates may be sent;
2. a clear, complete and detailed description of the facts forming the subject of the Report;
3. the time and place at which the facts covered by the report occurred and, consequently, a description of the facts covered by the report, specifying the details relating to the circumstantial evidence and, where applicable, the manner in which the facts covered by the report came to light;
4. the personal details or other information enabling the identification of the person reported;
5. the names of any other individuals who may be able to provide information regarding the facts covered by the Report;
6. an indication of any documents that may confirm the validity of these facts;
7. any other information that may provide useful evidence regarding the existence of the reported facts.
8. an express statement of the intention to benefit from whistleblowing protections, e.g. by including the phrase *"for the attention of the Report handler only"*.



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- The Company has opted for an internal reporting channel which allows reports by the *whistleblower* to be made:

A. IN WRITING, SENT BY POST:

“For the attention of the Reporting Officer/Manager” at PM Oil & Steel SpA – Via Verdi 22 41018 - San Cesario Sul Panaro, Modena (IT)”.

The Report must be submitted using three sealed envelopes, as specified below.

The first envelope must contain the Whistleblower’s identification details together with a photocopy of their identification document.

The second must contain the Report.

Both envelopes must then be placed inside a third envelope addressed to the Head of Reporting/Manager, bearing the word “Confidential” on the outside.

The envelope containing the personal details and the one containing the report must be kept separate from one another to ensure greater protection for the whistleblower.

B. VERBALLY:

- by telephone, on **+39 059 936830 from 9.00 am to 12.00 pm** on all working days from Monday to Friday
- at the request of the Whistleblower, by means of a face-to-face meeting arranged within a reasonable timeframe.

Upon receipt of the oral report, the Reporting Officer/Manager must document it in a detailed record, and the content must be countersigned by the whistleblower, subject to verification and any necessary corrections for the purposes of accepting the report. A copy of the signed record must be provided to the whistleblower.

The Reporting Officer/Manager is vested with the powers and assigned the duties described in this procedure.

If the internal report is submitted to a person other than the Reports Manager/Administrator, the report must be forwarded to the Reports Manager/Administrator within seven days of its receipt.

The Reporting Officer/Manager must issue the Reporting Person with an acknowledgement of receipt of the Report within seven days of the date of receipt (as provided for in Article 5(1)(a) of Legislative Decree 24/2023).

- Conflict of interest

If the Reporting Officer/Manager has a conflict of interest – for example, because they are the subject of the report or the person making the report – the report will be handled by members **of the Report Management Committee who** are not involved.

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7. Handling of Reports

In the cases referred to above, the Report shall be handled exclusively by the Reports Manager/Administrator, as provided for in Article 5 of Legislative Decree 24/2023.

The Reporting Officer / Manager has been appointed by the Company from a Committee comprising the **Chair of the Supervisory Body** and the Company's Legal Department.

Upon receipt of a Report, the Reporting Officer/Manager shall:

1. verifies the *Whistleblower's* standing to make the Report;
2. provides the Whistleblower with an acknowledgement of receipt within seven days of the date of receipt;
3. maintains communication with the Whistleblower;
4. ensures that the reports received are dealt with appropriately;
5. provides a response to the Whistleblower within three months or, in the absence of such notice, within three months of the expiry of the seven-day period following the submission of the Report;
6. provides clear information on the channel, procedures and requirements for making internal reports, as well as on the channel, procedures and requirements for making external reports. The aforementioned information is displayed and made clearly visible in the workplace, as well as accessible to persons who, although not present in the workplace, have a legal relationship in one of the forms referred to in Article 3, paragraphs 3 or 4. The information referred to in this procedure is also available in a dedicated section of the aforementioned website.

In particular, a proper follow-up entails, first and foremost, whilst respecting reasonable timeframes and data confidentiality, an assessment of whether the essential requirements of the report are met in order to evaluate its admissibility and thus be able to grant the whistleblower the protections provided for.

With regard to the response to be provided within three months, it should be noted that this may consist of notification that the matter has been closed, the initiation of an internal investigation and, where applicable, the related findings, the measures adopted to address the issue raised, or referral to a competent authority for further investigation.

However, it should be noted that this Response, to be provided within three months, may also be merely interim, as it may include information regarding all the activities described above that are intended to be undertaken and the progress of the preliminary investigation. In the latter case, once the preliminary investigation is complete, the outcomes must in any event be communicated to the Whistleblower.

8. Verification of the validity of the Report

The verification of the validity of the circumstances described in the Report is entrusted to the Head of Reports / Administrator.

If the Reporting Manager considers that the Report:

- merely a personal complaint or that the matter reported has already been investigated, they will close the Report;
- excessively vague, they will contact the Reporter to gather further relevant information. The Report will be closed if no further information is provided or if the information provided is insufficient.

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In all other cases, the Reports Manager/Administrator will proceed with the investigation.

The Reporter is informed of the closure of the Report or of its acceptance for processing.

The Reports Manager/Administrator may seek the support and cooperation of other internal and external departments.

If, following the investigation, the Report is found to be substantiated, the Reports Manager/Administrator will refer the matter to the Company's Chief Executive Officer, who, depending on the nature of the breach, will assess whether to file a complaint with the competent judicial authority and/or initiate disciplinary proceedings.

9. Conditions for initiating the external procedure

The Reporting Person may make an external report to ANAC (via the ANAC website: <https://www.anticorruzione.it>) if, at the time of submission, one of the following conditions, as provided for in Article 6 of Legislative Decree 24/2023, applies:

- a) there is no requirement, within their working context, to use the internal reporting channel; or, even if mandatory, this channel is not active; or, even if active, it does not comply with the provisions of Legislative Decree 24/2023;
- b) the Reporting Person has already made an internal report in accordance with paragraph 5 of this procedure and no action was taken in response;
- c) the Reporting Person has reasonable grounds to believe that, if they were to make an internal report, it would not be effectively followed up, or that the report itself could lead to a risk of retaliation;
- d) the Whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

10. Conditions for making a public report

Legislative Decree No. 24/2023 introduces an additional method of reporting, consisting of public disclosure, where the same conditions set out in paragraph 9(a) to (d) apply.

Through public disclosure, information on breaches is made public via the press or electronic media, or in any case through mass media capable of reaching a large number of people, such as: *Facebook, Twitter X, YouTube, Instagram*, which constitute a rapid and interactive means of communication.

Public disclosure of breaches must take place in accordance with the conditions laid down by the legislator so that the reporting person may then benefit from the protections recognised by the Decree. Therefore, protection will be granted if, at the time of disclosure, one of the conditions set out in Legislative Decree 24/2023 is met.

In the case of public disclosure, where the individual voluntarily reveals their identity, the protection of confidentiality does not apply, without prejudice to all other forms of protection provided for in the Decree for the *whistleblower*. Where, on the other hand, the individual discloses breaches using, for example, a pseudonym or a *nickname* that does not allow for their identification, the company will treat the disclosure as

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an anonymous report and will ensure it is recorded for retention purposes, so as to guarantee the whistleblower, in the event of their identity subsequently being revealed, the protections provided for if they have reported retaliation.

11. Reporting to the judicial authorities

Legislative Decree 24/2023, in accordance with the previous regulations, also grants protected persons the option of considering whether to approach the competent national judicial and accounting authorities to file a complaint regarding unlawful conduct of which they have become aware in a public or private work context.

12. Confidentiality obligations regarding the identity of the Whistleblower and exclusion from the right of access to the Report

With the exception of cases where liability for slander or defamation may arise under the provisions of the Criminal Code or Article 2043 of the Civil Code, and cases where anonymity is not enforceable by law (e.g. criminal, tax or administrative investigations, inspections by supervisory bodies), the identity of the Whistleblower is protected in all contexts following the Report and may not be disclosed without their express consent.

The primary purpose of the procedure for handling the Report is therefore to protect the confidentiality of the Whistleblower's identity at every stage (from receipt to subsequent handling), including in dealings with third parties whom the administration or the Company may need to contact for verification or for actions arising from the Report.

A breach of the duty of confidentiality gives rise to disciplinary liability, without prejudice to any further forms of liability provided for by law.

In the context of disciplinary proceedings arising from the Report, the identity of the Whistleblower may be disclosed to the Disciplinary Authority and to the Person Against Whom the Report is Made only in cases where:

- the Whistleblower has given their express consent;
- the disciplinary charge is based, in whole or in part, on the Report and knowledge of the Whistleblower's identity is absolutely essential to the defence of the Person Against Whom the Report is Made, provided that this circumstance is raised and substantiated by the latter during the hearing or through the submission of defence briefs.

13. Liability of the Whistleblower

This procedure is without prejudice to the criminal, civil and, for employees, disciplinary liability of the Whistleblower in cases of slanderous or defamatory reports in the circumstances referred to in Legislative Decree 24/2023.

14. Anonymous Reports

Reports from which the identity of the Reporting Person cannot be ascertained are considered anonymous. Anonymous reports, where detailed, are treated in the same way as ordinary reports and, in such cases, are considered within the "ordinary" supervisory procedures.

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If reports are received via the internal channel, the Reporting Officer/Data Controller shall treat anonymous reports in the same way as ordinary reports.

In any case, a whistleblower or anonymous complainant, subsequently identified, who has reported having suffered retaliation may benefit from the protection that the Decree guarantees against retaliatory measures.

15. Processing of personal data. Confidentiality

All processing of personal data shall be carried out in accordance with Regulation (EU) 2016/679, Legislative Decree No. 196 of 30 June 2003, and Articles 13 and 14 of the Decree; furthermore, failure to comply with confidentiality obligations may result in disciplinary liability, without prejudice to any further liability provided for by law.

The privacy notice regarding the processing of personal data following a Report is attached to this procedure.

Internal and external reports and the related documentation are retained for the time necessary to process the Report and, in any event, for no longer than 5 years from the date of notification of the final outcome of the Reporting procedure, in compliance with confidentiality and personal data protection obligations.

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ANNEX 1 PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF REPORTERS

NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13-14 OF REGULATION (EU) 2016/679 IN THE CONTEXT OF THE WHISTLEBLOWING PROCEDURE

Through this notice, PM OIL & STEEL SPA (hereinafter the “Company”) intends to provide the information required under Articles 13 and 14 of Regulation (EU) 2016/679 (or the “General Data Protection Regulation” – “GDPR”) regarding the processing of personal data carried out by the Company within the framework of its “Whistleblowing Procedure”, adopted in accordance with Legislative Decree No. 24 of 10 March 2023¹ and, in particular, all activities and obligations related to the operation of the company’s system for managing *whistleblowing* reports.

The following information is provided to “whistleblowers” and all other potentially “data subjects”, such as, for example, persons identified as possible perpetrators of unlawful conduct, any “facilitators” (as defined by the relevant legislation), as well as any other person involved in the “Whistleblowing Procedure” in any capacity.

1. Data Controller

The Data Controller is PM OIL & STEEL SPA, Via Verdi 22, 41018 San Cesario Sul Panaro, Modena (IT).

2. Categories of personal data processed and purposes of processing

In accordance with the provisions of the relevant regulations, personal data may be collected by the Company as contained in *whistleblowing* reports, or in the records and documents attached thereto, received by the Company through the channels provided for in the aforementioned Policy.

The receipt and handling of such reports may, depending on their content, give rise to the processing of the following categories of personal data:

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

With regard to the aforementioned categories of personal data, **it is emphasised that reports submitted must not contain information that is manifestly irrelevant for the purposes of the relevant regulations**; in particular, reporting parties are urged to refrain from using “special” and “judicial” unless deemed **necessary and essential** for the purposes of the reports, in accordance with Article 5 of the GDPR.

The aforementioned information will be processed by the Company – the Data Controller – in accordance with the provisions of Legislative Decree No. 24/2023 and, therefore, generally speaking, **for the purpose of carrying**

¹ Legislative Decree implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

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out the necessary preliminary investigations to verify the validity of the facts subject to the Report and the adoption of the consequent measures.

Furthermore, the data may be used by the Data Controller for **purposes related to the defence or assertion of its rights** in the context of judicial, administrative or out-of-court proceedings and in the context of civil, administrative or criminal disputes arising in connection with the Report made.

3. Legal bases for the processing of personal data

The legal basis for the processing of personal data is primarily **the fulfilment of a legal obligation** to which the Data Controller is subject – Article 6(1)(c) of the GDPR – which, in particular, pursuant to the aforementioned legislation, is required to implement and manage information channels dedicated to receiving reports of unlawful conduct detrimental to the integrity of the Company and/or the public interest.

In the cases covered by the same regulations, **specific and freely given consent** may be requested **from the Reporting Person** – pursuant to Article 6(1)(a) of the GDPR – and, in particular, where there is a **need to disclose their identity**, or where the **recording of reports collected orally**, by telephone or via voice messaging systems, or through face-to-face meetings with the Head of Report Management.

The processing of ‘special categories’ of personal data, which may be included in reports, is based **on the fulfilment of obligations and the exercise of specific rights of the Data Controller and the data subject in the field of labour law**, in accordance with Article 9(2)(b) of the GDPR.

As regards the purpose of establishing, exercising or defending a legal claim, the relevant legal basis for the processing of personal data is the **Data Controller’s legitimate interest** in this regard, as referred to in Article 6(1)(f) of the GDPR; for the same purpose, the processing of ‘special category’ personal data, where applicable, is based on Article 9(2)(f) of the GDPR.

4. Nature of the provision of personal data

The provision of personal data is mandatory as, in accordance with the company’s “Whistleblowing Procedure”, anonymous reports – that is, reports from which the identity of the Whistleblower cannot be ascertained – will not be considered. The personal data provided will be processed for the purpose of handling the report, in accordance with the limits and confidentiality safeguards imposed by the relevant legislation.

5. Methods of processing and retention period for personal data

The processing of personal data included in reports submitted in accordance with the “Whistleblowing Procedure” will be carried out by persons “appointed and authorised” by the Company and will be based on the principles of fairness, lawfulness and transparency, as set out in Article 5 of the GDPR.

The processing of personal data may be carried out using analogue and/or computerised/telematic methods, for the purposes of storing, managing and transmitting such data, in any case, in accordance with appropriate physical, technical and organisational measures designed to ensure their **security and confidentiality at every stage of the procedure, including the archiving of the Report and related documents** – subject to the provisions of Article 12 of Legislative Decree No. 24/2023 – with particular reference to the identity of the Whistleblower, the persons involved and/or otherwise mentioned in the reports, the content of the reports and the related documentation.

Reports received by the Company, together with the attached records and documents, will be retained for the time necessary to process them and, in any event, as required by law, **for a period not exceeding five years**



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from the date of notification of the relevant final outcomes. After this period, the reports will be deleted from the system.

In line with the guidance provided in paragraph 1, personal data included in reports that are manifestly irrelevant to the purposes of the reports will be deleted immediately.

6. Scope of disclosure and transfer of personal data

In addition to the aforementioned internal personnel, specifically authorised by the Data Controller, the personal data collected may also be processed, within the scope of the “Whistleblowing Procedure” and for the purposes indicated, by the following third parties, formally designated as Data Processors where the conditions set out in Article 28 of the GDPR are met:

- consultancy and support service providers for the implementation of the “Whistleblowing Procedure”;
- IT companies and professionals regarding the application of appropriate technical, IT and/or organisational security measures to the information processed by the company’s system;
- members of the Supervisory Body.

Where applicable, personal data may be disclosed to the Judicial Authorities and/or Police Authorities upon their request in the context of judicial investigations.

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

Under no circumstances will personal data be disclosed.

7. Rights of the data subject

Every data subject has the right to exercise the rights set out in Articles 15 et seq. of the GDPR, in order to obtain from the Data Controller, for example, access to their personal data, the rectification or erasure of such data, or the restriction of processing concerning them, without prejudice to the possibility, in the absence of a satisfactory response, of lodging a complaint with the Data Protection Authority.

Rights of the data subject (Articles 15 to 22 and Article 13 of the GDPR)

Right of access	The data subject has the right, in accordance with Article 15 of the GDPR, to request access to their personal data from the data controller.
Right to rectification	The data subject has the right, in accordance with Article 16 of the GDPR, to request that the data controller rectify their personal data.
Right to erasure	The data subject has the right, in accordance with Article 17 of the GDPR, to request that the data controller erases their personal data.
Right to restriction	The data subject has the right, in accordance with Article 18 of the GDPR, to request that the data controller restrict the processing of their personal data.
Right to object	The data subject has the right, in accordance with Article 21 of the GDPR, to object to the processing of their data.
Right to data portability	The data subject has the right, in accordance with Article 20 of the GDPR, to exercise their right to data portability.
Additional notes	The data subject may also lodge a complaint with a supervisory authority (for example, the Data Protection Authority).

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To exercise these rights, you must submit a specific request in any format to the Data Controller at the following address: **Privacy_Whistleblowing @pec.pm-group.eu** or send the form available on *the website* of the Italian Data Protection Authority to the same address.

In this regard, please note that the aforementioned rights of data subjects may be restricted in accordance with and for the purposes set out in Article 2-undecies of Legislative Decree No. 196 of 30 June 2003 (*"Privacy Code"*, as amended by Legislative Decree No. 101/2018), for as long as and to the extent that this constitutes a necessary and proportionate measure, should the exercise of such rights result in a concrete and actual prejudice to the confidentiality of the identity of the reporting individuals.

In such cases, data subjects shall nevertheless be entitled to refer the matter to the Data Protection Authority so that the latter may assess whether the conditions are met for taking action in accordance with the procedures laid down in Article 160 of Legislative Decree No 196/2003.