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TITLE: WHISTLEBLOWING POLICY - Legislative Decree No. 24 of 10 March 2023
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1. PURPOSE AND SCOPE

Whistleblowing is a fundamental tool for encouraging anyone who is part of Pietro Fiorentini

S.p.A. to promptly report any situation that could compromise legal compliance and ethics within Pietro Fiorentino

S.p.A.

This procedure was introduced by Legislative Decree 24/2023, implementing European Directive 1937/2019 in Italy, to ensure the protection of those who report violations of European Union laws, as well as national regulations,

which damage the interests or integrity of the public or private entity in which they work.

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Introduction

Pietro Fiorentini S.p.A., a company belonging to the Pietro Fiorentini Group, has aligned its business policy with the principles of legality and fairness set out in its Code of Ethics, thereby demonstrating its opposition to improper or illegal policies and conduct.

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Compliance with the principles set out in the Code of Ethics is the responsibility of both Pietro Fiorentini employees and all those who collaborate with the Company. This policy is set out in the Organization, Management and Control Model for the prevention of criminal offences, adopted pursuant to and for the purposes indicated in Articles 6 and 7 of Legislative Decree 231/2001 (the "*Model 23a*").

Pietro Fiorentini, also with a view to safeguarding the principles expressed in the Code of Ethics, has implemented Legislative Decree no. 24 of 10 March 2023 "*Implementation of Directive (EU) Y937/26/f9 on the protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national law*".

Fiorentini has therefore adopted a whistleblowing system to support, encourage and protect anyone, whether internal or external to the company, who wishes to report violations of national or European Union regulations that harm the public interest or the integrity of the company, violations of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 (where applicable), as well as violations of the Code of Ethics, the company's internal policies and procedures and, in general, potential violations of the Management and Control Model pursuant to Legislative Decree 231/2001 (where applicable), as well as violations of the Code of Ethics, the company's internal policies and procedures and, in general, potential violations of laws and regulations, as described in more detail in this Policy.

With the adoption of this Policy, Pietro Fiorentini, in compliance with the guidelines provided by ANAC, provides whistleblowers, or individuals who report violations, with clear operational instructions regarding the subject matter, content, recipients and methods of transmission of reports.

1. Who can make a report

Pursuant to the Whistleblowing legislation, the following persons are entitled to report violations:

- a) subordinate employees, when the legal relationship is ongoing or even during the probationary period;
- b) self-employed workers, contractors, suppliers, freelancers and consultants;
- c) volunteers and trainees, paid and unpaid;
- d) shareholders and persons with functions in administration, management, control, supervision or representation (including de facto).

Protection for the Whistleblower is also guaranteed in the following cases:

- y) when the legal relationship described above has not yet begun, if the information on the violations was acquired during the selection process or in other pre-contractual stages;
- yy) after the termination of the legal relationship if the information on the violations was acquired during the course of the relationship itself.

2. Subject of the report

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The following may be subject to whistleblowing: confirmed violations or well-founded suspicions of violations, conduct aimed at concealing violations of national and EU law, relating to:

- administrative, accounting, civil and criminal offences,
- unlawful conduct relevant to Legislative Decree 231/2001;
- violations of the organization and management model pursuant to Legislative Decree 231/2001;
- violations of EU law, including, but not limited to, violations of legislation on: public procurement, prevention of money laundering, security and product compliance, transport safety, environmental protection, food safety, consumer protection, personal data protection;
- acts or omissions that damage the financial interests of the European Union (such as fraud, corruption and any other illegal activity that may damage the financial interests of the EU) or that may damage the free movement of goods, persons, services and capital within the European market.

By way of example, but not limited to, the following behaviours may be subject to whistleblowing:

- corruption between private individuals or other illegal conduct in relations with suppliers or customers;
- falsification, alteration, destruction or concealment of documents; irregularities in accounting, administrative or tax compliance; falsification of expense reports (e.g. 'inflated' reimbursements or false travel expenses);
- theft of money, valuables, supplies or other property belonging to the Company or customers; unauthorized disclosure of confidential information; computer fraud;
- breaches of health and safety regulations in the workplace;
- breaches of tax regulations;
- violation of competition law (antitrust); disclosure of trade secrets.

3. Types of reports

To ensure accurate assessment of the report, it is important that it contains all information useful for ascertaining the facts and identifying the individuals responsible for the violations. The report must therefore not be ambiguous or generic and must concern verifiable facts known directly by the reporting party.

Under penalty of inadmissibility, the report must contain:

- the identifying details of the reporting person and a contact address to which any subsequent updates can be sent;
- a clear, complete and detailed description of the facts reported;
- the circumstances of time and place in which the event reported occurred, specifying the details relating to the circumstantial information and, where applicable, also the manner in which the facts reported became known;
- the personal details or other information that allows the identification of the person(s) believed to be responsible for the reported events;

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- an indication of any other persons who may be able to report on the events reported;
- any documents that may confirm the validity of these facts;
- any other information that may provide useful confirmation of the existence of the reported facts;

In the case of use of the analogue channel (intra), the express declaration of wishing to benefit from whistleblowing protections, e.g. by inserting the wording *"confidential to the report manager"*.

The whistleblower must make the report in good faith, with the reason/belief, based on grounds justified in light of the circumstances of the case and the data available at the time of the report, that the allegations are true (regardless of whether such facts may subsequently be found to be incorrect or unfounded).

Reports that are manifestly unfounded, opportunistic and/or made for the sole purpose of damaging the reported party or any other person involved in the report will not be taken into consideration and will be subject to disciplinary sanctions and/or legal action by the competent judicial authority.

4. **Actions, facts and circumstances that cannot be reported**

The Whistleblowing system must not be used to offend or damage the honour and/or personal and/or professional reputation of the person or persons to whom the reported facts refer, or to knowingly spread unfounded accusations.

In particular, by way of example and without limitation, it is prohibited to send reports:

- for purely defamatory or slanderous purposes;
- of a discriminatory nature, in that they refer to the sexual, religious and political orientations or the racial or ethnic origin of the reported subject;
- made for the sole purpose of harming the reported subject.

5. **Irrelevant reports/actions**

Reports must relate to the scope of this Policy. In particular, reports are considered irrelevant if they:

- refer to reported individuals or companies that are not part of the scope of application defined by this Policy;
- refer to facts, actions or behaviour that are not subject to reporting under this Policy;
- relate exclusively to aspects of the private life of the reported individual, without any direct or indirect connection with their work/professional activities within the Company or in their relations with it;
- concern a dispute, claim or request linked to the personal interests of the person making the report;
- are incomplete and/or unsubstantiated and unverifiable according to their content; - refer to matters not covered by the regulations.

6 **Anonymous reports**

Pietro Fiorentini encourages open reporting and invites whistleblowers to provide their name and contact details, also with a view to establishing an open and transparent dialogue, which is useful for providing all the information necessary for a proper assessment of the facts.

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Pietro Fiorentini reserves the right to consider anonymous reports in order to initiate investigations/inquiries to verify the reports, only if they contain accurate, consistent and adequately detailed information. In any case, measures to protect the whistleblower shall only apply if the latter is subsequently identified and has suffered retaliation.

7. **Responsible for managing the report/action taken**

In order to manage reports and safeguard both the integrity of the Company and the protection of the whistleblower, the Legal Department has been appointed within the company structure as the body responsible for managing reports.

The latter, if the management of the Report proves particularly complex, may be assisted by the Supervisory Body, appointed pursuant to Law 231/2001.

The person responsible for managing the report and the Supervisory Body shall have specific training and must guarantee their respective autonomy (Article 4 of Legislative Decree No. 24/2023).

If the person responsible for managing the report has a conflict of interest, for example, as the subject of the report or the person making the report, the report will be handled by the Human Resources Department.

8. **Internal channels for reporting**

The whistleblower may submit a report through the following channels, either identified or anonymously — which can also be done by filling in the relevant form (attached):

BOX AVAILABLE AT THE COMPANY: by placing the report in the box located at Pietro Fiorentini's registered office for the purpose of collecting reports, which will be examined by the report manager. To this end, it is advisable to fill in the appropriate form (a//. 1j downloadable from the Whistleblowing platform, place it in a sealed envelope, which must be placed in another sealed envelope, on which the words "Confidential WHIST." must be written.

DIGITAL "WHISTLEBLOWING" PLATFORM: the cloud platform is available 24 hours a day, 7 days a week, at the following link: <https://fiorentini.segnalazioni.net>, through which it is also possible to upload attachments, files, videos and audio files. Such reports can be submitted in Italian and/or English.

SENDING E-MAILS: by sending an e-mail to segnalazioniwhist@fiorentini.com, writing "Riservato WHIST." in the subject line of the e-mail.

REGISTERED MAIL: by sending a communication to the following address: Pietro Fiorentini S.p.a. - Via E. Fermi 8/10 — 36057 ARCUGNANO (VI). The paper report must be placed in two sealed envelopes. The first envelope must contain a sheet with the reporter's identification details and a photocopy of their identity document; the second envelope must contain the text and subject of the actual report. Both envelopes must then be placed in a third sealed envelope with the following wording on the outside (in addition to the address): 'Riservato WHIST, all'attenzione dell'Ufficio legale di Pietro Fiorentino' (Confidential WHIST, for the attention of Pietro Fiorentini's Legal Department).

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REQUESTING A FACE-TO-FACE MEETING: with the above formalities, you may also request a meeting with a member of the Legal Office delegated for this purpose. The meeting will be arranged within a reasonable time frame. The request can be submitted using the channels listed above or by sending an email directly to segnalazioniwhisttOfiorentini.com, indicating the general reason for the meeting request and 'Confidential WHIST' in the subject line of the email.

9. Other reporting methods.

a) External reports

Reporting via the external channel established and managed by ANAC is also permitted.

However, such reporting is only permitted in cases provided for by law. In such cases, the recipient will be the National Anti-Corruption Authority (ANAC).

External reporting is possible if:

- an internal report has been made but no action has been taken; there are reasonable grounds to believe that an internal report would not be effectively followed up, or that it could lead to retaliation/discrimination;
- there are reasonable grounds to believe that the violation poses an imminent or obvious danger to the public interest.
- For external reports, please refer to the Guidelines on the procedures for submitting and managing such reports on the ANAC website.

b) Public disclosures

Article 15 of Legislative Decree No. 24/2023 provides for the protection of whistleblowers even when they make a so-called '*public disclosure*' of information on violations through the press, electronic media or means of dissemination capable of reaching a large number of people (pursuant to Article 2, paragraph 1, letter f), Legislative Decree No. 24/2023).

The protection of whistleblowers who make a public disclosure is guaranteed only if, at the time of disclosure, one of the following conditions applies:

- the whistleblower has previously made an internal or external report, under the conditions and in the manner provided for by law, but has not received a response within the specified time frame;
- the whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- the whistleblower has reasonable grounds to believe that the external report may lead to retaliation or may not be effectively followed up due to the specific circumstances of the case. For example, if the whistleblower believes that evidence may be concealed or destroyed, or if the whistleblower has reasonable grounds to fear that the recipient of the report may be colluding with the perpetrator of the violation or involved in the violation itself.

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10. Process for managing reports of non-compliance

In the event of reports of unlawful conduct, the internal process established by Pietro Fiorentini provides for the following procedure:

1' SUBMITTING THE REPORT:

Anyone who has reasonable suspicion that unlawful conduct has occurred or may occur can submit a report through the channels established by Fiorentini.

2' RECEIPT OF THE REPORT AND CONFIRMATION OF RECEIPT OF THE REPORT:

- the person responsible for managing the report sends a notice of receipt of the report to the whistleblower **within seven days of receipt**, ensuring a reasonable timeframe, **not exceeding three months**, to provide feedback on the outcome of the internal investigation;
 - the person responsible for handling the report shall maintain dialogue with the whistleblower;
- The person responsible for managing the report assesses its admissibility in order to grant the whistleblower the protections provided for. The person responsible for managing the report may proceed to archive reports that are manifestly unfounded due to the absence of suitable factual elements, reports with excessively generic content or reports accompanied by inappropriate and/or irrelevant documentation, or reports that are irrelevant or prohibited under this Policy.
- if the report is not sufficiently detailed, the person responsible for managing the report may ask the whistleblower for additional information through the dedicated channel, or even in person, if the whistleblower has requested a face-to-face meeting.

The receipt of reports is suspended during the Company's closing period.

3^ INVESTIGATION

Once the report has been assessed for admissibility, the person responsible for managing the report will initiate an internal investigation to examine the facts or conduct reported in order to assess their validity.

4^ OUTCOME OF THE INTERNAL INVESTIGATION

At the end of the investigation, the person responsible for managing the report will take the measures deemed most appropriate. Within three months of the date of receipt of the report, the person responsible for the report must send feedback to the reporter, highlighting the measures to be taken and the reasons for the choice made.

11. Protection of the whistleblower, the person reported and other individuals.

Whistleblowers cannot be subjected to any form of retaliation. The law stipulates that those who make reports cannot be sanctioned, demoted, dismissed, transferred or subjected to any other organizational measure that directly or indirectly has a negative effect on their working conditions or results in discrimination or retaliation against them.

It is the responsibility of the person in charge of managing the report to ensure the confidentiality of the whistleblower, even if the report is subsequently found to be incorrect or unfounded. All the protections provided for by the relevant legislation apply to whistleblowing reports, and in particular:

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11.1 Protection of the confidentiality of the report

Pietro Fiorentini guarantees the confidentiality of the whistleblower's identity and the information contained in the report throughout the entire process of its management. Failure to comply with confidentiality obligations by any party involved in the management of reports may result in disciplinary action against the perpetrator of the breach, without prejudice to any further liability provided for by law.

11.2 Disclosure of the identity of the whistleblower

The identity of the whistleblower, as well as any other information from which that identity can be directly or indirectly inferred, may not be disclosed, without the express consent of the whistleblower, to persons other than those expressly authorized to handle *reports*, even if the reports prove to be unfounded.

Confidentiality regarding the identity of the whistleblower may not be respected when:

- (i) the whistleblower has given their express written consent to the disclosure of their identity;
- (ii) the whistleblower's criminal liability for offences of slander or defamation or, in any case, for offences committed in connection with the report has been established by a first instance judgment, or their civil liability has been established in cases of willful misconduct or gross negligence in relation to the subject matter of the report;
- (iii) anonymity is not enforceable by law and the identity of the whistleblower is requested by the judicial authorities in relation to investigations (criminal, tax or administrative investigations, inspections by supervisory bodies).

11.3 Protection of the whistleblower from retaliatory acts.

Pietro Fiorentini undertakes to protect the whistleblower against any retaliatory acts as a result of the report.

Retaliation refers to any behavior, act or omission, even if only attempted or threatened, carried out as a result of the report, which causes or may cause the whistleblower, directly or indirectly, unjust *damage*.

Whistleblowers who believe they have been subjected to retaliatory and/or discriminatory acts may report this to the designated recipient or, if they are employees, to senior management, so that they can assess whether there are grounds for initiating disciplinary proceedings against the perpetrator of the retaliation and/or discrimination.

11.4 Protection of the reported person and persons mentioned in the report

Pietro Fiorentini adopts the same forms of protection listed above to guarantee the confidentiality of the identity of the whistleblower, including vis-à-vis the alleged perpetrator of the conduct or violation, as well as the persons mentioned in the report, without prejudice to any legal obligation to disclose the name of the reported person (e.g. if requested by the judicial authorities).

In internal reporting procedures, the reported person will be informed of the proceedings initiated against them following the conclusion of the report and may be heard during the preliminary investigation in support of their right of defence.

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11.5 Protection of other parties

The aforementioned protection measures will also be applied to any third parties involved in the report, such as, for example:

- third parties who have supported the whistleblower during the reporting process (so-called '*facilitators*'),
- persons from the same working environment as the whistleblower and who are linked to him/her by a stable emotional bond or family relationship;
- colleagues of the whistleblower who work in the same workplace and have a regular and ongoing relationship with him/her.

However, if the reports are the subject of a complaint to the judicial authorities, the identity of the persons involved or mentioned in the report may be disclosed during the investigation and at the request of the competent authority.

The obligation of confidentiality also extends to any documentation attached to the report, if such identity can be directly or indirectly inferred from it. Confidentiality must also be ensured during disciplinary proceedings initiated by the Company against the alleged perpetrator of the violation.

12. Record of the form for each person/f and entry of the registers

Pietro Fiorentini is the data controller pursuant to Regulation (EU) No. 679/2016 (known as *GDPR*) and provides specific privacy information in this regard. The personal data of whistleblowers, reported parties and all parties involved in the report are processed exclusively for the purposes of compliance with the aforementioned Regulation and Legislative Decree No. 51/2018. Failure to comply with confidentiality obligations may result in disciplinary action, without prejudice to any further liability provided for by law.

The information notice relating to the processing of personal data following whistleblowing reports is attached hereto.

The processing is carried out using manual, computerised and telematic tools, in such a way as to guarantee the security and confidentiality of the data in full compliance with the provisions of the law and regulations. The management of reports is carried out directly by the Data Controller's organisation through appropriately designated and trained individuals acting as Authorised Persons.

13. Responsibility of the whistleblower

This Policy does not affect the criminal and disciplinary liability of the reporting party in the event of slanderous or defamatory reports, pursuant to the Criminal Code and Article 2043 of the Civil Code.

Pursuant to Article 21, paragraph 1, letter c) of Legislative Decree No. 24/2023, ANAC may impose a fine ranging from €500.00 to €2,500.00 on the whistleblower, where their civil liability is established, on the grounds of wilful misconduct or gross negligence, for the offences of slander and defamation.

Any abuse of this Policy, such as reports that are clearly opportunistic or made for the sole purpose of harming the reported and/or other subjects or carried out for improper use or intentional exploitation of the institution covered by this Policy.

14. Traceability and archiving

Pietro Fiorentini takes precautions to store information and documentation relating to the identity of the whistleblower and the contents of the report in accordance with Article 14 of Legislative Decree No. 24/2023.

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Reports and related documentation will be kept for the period of time deemed strictly necessary for their management and verification of their validity and, in any case, for a period not exceeding 5 years from the date of notification to the reporting party of the final outcome of the report, in compliance with the confidentiality obligations set out in Article 12 of the aforementioned Decree. After this period, reports and related documentation will be deleted, except in the event of disciplinary and/or legal proceedings, in which case the data may be retained for the duration of the proceedings and for a further 10 years from their conclusion.

In the case of oral reports, storage must be guaranteed in accordance with Article 14 of Legislative Decree No. 24/2023. In particular, when, at the request of the reporting person, the report is made orally during a meeting, it shall, with the consent of the reporting person, be documented by recording on a device suitable for storage and playback or by means of minutes.

The whistleblower must verify and confirm the minutes by signing them.

The Policy, drawn up in accordance with the requirements of current legislation and the values of the Code of Ethics, forms an integral part of the Organisation, Management and Control Model adopted by the Company.

4. REFERENCE TO OTHER DOCUMENTS

NUMBER REFERENCE	DOCUMENT TITLE	POSITION OF FILING
Annex 1	WHISTLEBLOWING REPORTING FORM PURSUANT TO LEGISLATIVE DECREE 23/2024	Company Standard

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