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Whistleblowing Policy

Management of reports of unlawful conduct or irregularities

Hyphen-Integration S.r.l.

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Introduction

The term "whistleblowing" refers to the action by which an employee, at any level and with any responsibility, reports to the bodies entitled to take action a violation or irregularity committed in the interest or to the advantage of the Company.

This procedure applies to Hyphen-Integration S.r.l. (the "Company") and is intended to regulate a system for reporting irregularities in the course of the Company's activities. In particular, the procedure implements the provisions of Italian Legislative Decree no. 24 of 10 March 2023 (the "Whistleblowing Decree"), "implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 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 laws", which governs the protection of persons who report breaches of national or European Union law that harm the public interest or the integrity of the public administration or of a private entity, of which they have become aware in a public or private work context.

The procedure also complies with personal data protection legislation and, in particular, with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data.

Purpose of the policy

The purpose of this policy is to regulate how reports of misconduct or suspected unlawful acts are made, governing every stage of the process: from the submission of the report, its receipt by the recipients, to the analysis, handling and decision on the report, while guaranteeing the confidentiality of the reporting person and the reported person and protecting the reporting person from any retaliatory and/or discriminatory action resulting from the report.

This document also aims to:

- provide clear and precise guidance on the communication channels that can be used, the subject of reports and how to make them;
- guarantee the confidentiality of the identity of the reporting person and the reported person, without prejudice to the rules governing the initiation of any legal proceedings by the national authorities in relation to the facts reported, or any disciplinary proceedings initiated by the Company in the case of reports made in bad faith;
- adequately protect reporting persons acting in good faith against any form of retaliation or discrimination for reasons connected, directly or indirectly, with the report;
- take the necessary action against anyone who makes untruthful reports in bad faith.

This policy is published on the website www.hyphen-integration.com and on the portal marketing.chalco.net/MarketingPortal.

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Subject of reports

Reports may concern conduct, acts or omissions that harm the public interest or the integrity of the public administration or of a private entity, of which the Reporting Person has become aware in the work context of Hyphen-Integration S.r.l.

What are the main types of conduct that can be reported?

By way of example:

- administrative, accounting, civil or criminal offences;
- unlawful conduct under Italian Legislative Decree no. 231/2001 or violations of the organisation and management models provided for by that decree;
- offences falling within the scope of the EU or national acts listed in the specific annex to the decree or in the annex to Directive (EU) 2019/1937, in the areas of public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and feed safety, animal health and welfare; public health; consumer protection; protection of privacy and personal data, and security of network and information systems;
- acts or omissions affecting the financial interests of the EU;
- acts or omissions relating to the internal market;
- acts or conduct that defeat the object or purpose of EU provisions in the areas referred to in the decree.

What cannot be reported?

Cases in which the person reporting has a personal interest and the report relates exclusively to their own employment relationship are excluded from the scope.

Requirements for reports

Reports must be made in good faith, be detailed and be based on precise, verifiable facts known directly to the person reporting them. In addition, reports must contain all the information needed to identify the perpetrators of the reported conduct.

Reporting persons, including anonymous ones, are responsible for making reports in good faith. Reports that are manifestly unfounded, or made with the aim of harming the persons concerned by the report, will not be taken into consideration and may lead to disciplinary sanctions and/or legal action.

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Who can make a report

Reports may be made by the following persons:

- shareholders and persons with administrative, management, control, supervisory or representative functions, even where such functions are exercised on a de facto basis, at Hyphen-Integration S.r.l.;
- self-employed workers carrying out their work at Hyphen-Integration S.r.l.;
- workers or collaborators carrying out their work at Hyphen-Integration S.r.l. who supply goods or services or carry out works for third parties;
- employees of Hyphen-Integration S.r.l.;
- freelance professionals and consultants working at Hyphen-Integration S.r.l.;
- volunteers and trainees, paid and unpaid, working at Hyphen-Integration S.r.l.;
- candidates during the selection process, if the information on the violations was acquired during the selection process or at other pre-contractual stages; new recruits during their probationary period; former employees, if the information on the violations was acquired during the employment relationship.

> **Is it essential to identify yourself when making a report?**
>
> The name of the reporting person and the subject of the report will be treated with the utmost confidentiality. It is nevertheless possible to make anonymous reports. However, unlike named reports, anonymous reports must be more detailed and thorough for the investigation to be started.

Reporting channels

Article 4 of the Decree requires private-sector entities, after consulting trade union representatives or organisations, to set up their own reporting channels that guarantee, including through the use of encryption tools, the confidentiality of the identity of the reporting person, of the person concerned and of any person mentioned in the report, as well as of the content of the report and the related documentation.

If a reporting person has reasonable grounds to suspect that unlawful conduct has occurred or may occur, they can report it through the following channels.

IT platform: allows written reports to be submitted electronically and guarantees confidentiality, including through encryption tools. The Platform is available 24 hours a day, 7 days a week, and can be accessed via the link indicated on the portal marketing.chalco.net. The platform allows attachments, video and audio files to be uploaded. A voice messaging system will also be available on the IT platform, allowing reports to be made orally.

In-person meeting: will be arranged within a reasonable time, with the designated staff.

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Ordinary post: reports can also be sent by ordinary post to the following address: Via Marconi 14, 37010 Affi (VR), Italy, addressed to the Managing Body (Organo Gestorio). To guarantee confidentiality, the report must be placed in two sealed envelopes: the first containing the reporting person's identification details together with a photocopy of their identity document; the second containing the report, so as to keep the reporting person's identification details separate from the report. Both envelopes must then be placed in a third sealed envelope marked "confidential" on the outside, addressed to the report manager (the Managing Body).

The reporting process

01
Submission of the report
through the channels of Hyphen-Integration S.r.l.

02
Acknowledgement of receipt
to be provided to the reporting person within 7 days of receipt of the report

03
Assessment of the report
of the relevance of the report by the Managing Body

04
Verification and investigation
diligent follow-up of the report with all the necessary activities

05
Feedback on the report
feedback to the reporting person within 3 months of the date of the acknowledgement of receipt

06
Disciplinary measures and follow-up
any corrective and/or disciplinary measures and follow-up

The stages follow each other in the order shown (from 01 to 06).

The report manager

The Company has identified a dedicated Office (the Managing Body, "Organo Gestorio") as the Recipient and Manager of the reporting process, made up of specifically trained staff, namely: HR Manager, HR Assistant and Legal Manager. The Managing Body is responsible for the preliminary checks on the admissibility of reports and for monitoring the reports made. It promotes the actions needed to disseminate this Policy widely, as well as information and training activities on the Policy and the underlying legislation, addressed to the staff of Hyphen-Integration S.r.l. and, more generally, to the recipients of the Policy.

If a member of the Committee is a Person Involved in the Report, the Reporting Person may decide to address the Report only to the other members of the Committee, excluding the Person Involved in the Report.

> If a report is submitted to a person other than the Managing Body, it must be forwarded to the Managing Body within 7 days, notifying the Reporting Person at the same time.

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Assessment of reports

The Managing Body takes charge of the reports made through the channels provided by Hyphen-Integration S.r.l. in order to carry out a preliminary assessment of whether the report falls within the scope of the Whistleblowing Decree.

The preliminary assessment may require clarification or additional information to be requested from the reporting person, through the reserved personal area or through other appropriate channels.

The report is always analysed in full compliance with the applicable laws and regulations, including those on the processing of personal data. Within 7 days of receipt of the report, the reporting person receives confirmation that it has been received.

If the report is judged not to be relevant or not to be admissible, it will be filed and the Reporting Person will be informed.

Following the outcome of the preliminary assessment, the report is entered in a dedicated electronic Register of Reports. All stages of the handling of the report, as well as all actions taken, will be recorded in this Register.

> **When can a report be filed?**
>
> For example: manifest lack of grounds due to the absence of facts attributable to the specified Violations; established generic content of the report, such that the facts cannot be understood, or a report of offences accompanied by inappropriate documentation or documentation that does not make the content of the Report clear; submission of documentation only, without any report of unlawful conduct.

Verification and investigation

If, following the preliminary analysis, the Managing Body considers the facts described in the report to be well-founded and relevant, it proceeds to analyse the report, initiating the related internal investigation.

The activities carried out during this stage are conducted in compliance with the time limits set by the relevant legislation and with the principles of independence, professionalism and confidentiality of the verification activities.

To this end, the Managing Body (where it considers it useful or necessary) may involve the company functions concerned by the checks and/or use the assistance of any external parties appointed for this purpose.

More specifically, at this stage the Managing Body will:

– close the investigation at any time if, during the investigation, the report is shown to be unfounded;

- ensure that the investigation is conducted fairly and impartially and that the confidentiality of the identity of the Reporting Person and of all the persons involved, including the Reported Person, is protected;
- ensure that appropriate measures are taken for the collection, processing and storage of personal information, in compliance with applicable Privacy legislation;
- define how the Reported Person will be informed of the allegations against them and of any disciplinary proceedings brought against them, in order to guarantee their right of defence;
- ensure that all activities during the investigation stage are carried out with the utmost accuracy and promptness.

> It is not the responsibility of the Managing Body to establish individual liability of any kind, nor to carry out checks on the legitimacy or merits of acts and measures adopted by the entity/administration that is the subject of the report, as this would encroach on the competences of the persons responsible for this within each entity or administration, or of the judiciary.

The Managing Body draws up and keeps the minutes of any meetings held and checks carried out.

Outcome of the investigation and closure of the report

At the end of the investigation, the Managing Body draws up a report on the activities carried out and on the final assessment of the report and also records in the electronic Register of Reports the outcome of the verification and any sanctions imposed on the Reported Person, as well as the opening of any legal proceedings against them.

> In the case of unfounded reports, the Managing Body will file the report, recording this in the Register of Reports and informing the reporting person at the same time.

> In the case of reports that are manifestly unfounded or made in bad faith, with the sole aim of discrediting one or more persons or the company, the Managing Body involves the Board in order to take appropriate measures against the reporting person, including the possibility of reporting the matter to the competent judicial authority.

No sanction or action is envisaged against those who report in good faith facts that subsequently prove to be unfounded.

At the end of the investigation stage, and in any case within three months of the date of the acknowledgement of receipt or, in the absence of such acknowledgement, within three months of the expiry of the seven-day period from submission, the Managing Body informs the Reporting Person of the findings of the investigation.

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Protection of the reporting person, the reported person and other parties

Confidentiality of the report

In compliance with national and supranational legislation on the protective measures to be adopted to protect the Reporting Person, Hyphen-Integration S.r.l. guarantees confidentiality regarding the identity of the Reporting Person and the information contained in reports throughout the entire report-handling process.

Without prejudice to any further liability provided for by law, Hyphen-Integration S.r.l. provides for disciplinary liability for anyone who breaches the confidentiality obligations.

From the moment the report is taken into charge, the Managing Body is responsible for guaranteeing the confidentiality of the reporting person and for protecting any other information that could reveal, directly or indirectly, the identity of the person who made the report. This responsibility remains even if the report later proves to be unfounded or not relevant.

Hyphen-Integration S.r.l. also undertakes to protect the Reporting Person and the persons involved in the report-handling process from any form of retaliation, discrimination and/or penalisation for matters connected, directly or indirectly, with the report.

> Disclosure of the identity of the Reporting Person, and of the information contained in reports, is permitted in exceptional cases, such as, by way of example:
> - investigations by the competent national authorities;
> - legal proceedings;
> - public order matters.

In such cases, the Reporting Person is informed before disclosure takes place, unless this would prejudice any investigations and/or legal proceedings.

Protection of the reported person

In order to prevent prejudicial situations from arising in the work context, Hyphen-Integration S.r.l. adopts the same protective measures used to safeguard the confidentiality of the Reporting Person also for the alleged perpetrator of the conduct or violation (the so-called Reported Person), except where the Company may be required by law to disclose the identity of the Reported Person (for example, if requested by the judicial authorities).

In addition, the Reported Person is guaranteed:

- the right to be informed within a reasonable time of the allegations made against them and of any disciplinary sanctions taken against them;
- the right to defend themselves by presenting their version of the facts and any evidence useful to refute the allegations made against them.

In accordance with the law, or following specific requests from public bodies (e.g. administrative authorities), the personal data of the Reported Person may be transmitted to such bodies.

Protection of other parties

The protective measures described above also apply to any third parties involved in the report, as specified below:

- persons who assisted the Reporting Person in making the report (so-called "facilitators");
- persons in the same work context as the Reporting Person, as the person who filed a complaint with the judicial or accounting authorities or as the person who made a public disclosure, who are linked to them by a stable emotional bond or by kinship up to the fourth degree;
- work colleagues of the Reporting Person, or of the person who filed a complaint with the judicial or accounting authorities or made a public disclosure, who work in the same work context and have a regular and current relationship with that person;
- entities owned by the Reporting Person or by the person who filed a complaint with the judicial or accounting authorities or made a public disclosure, or for which those persons work, as well as entities operating in the same work context as those persons.

Confidentiality and personal data protection

Duty of confidentiality

Reports may not be used beyond what is necessary to follow them up adequately.

The identity of the reporting person and any other information from which that identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those competent to receive or follow up reports, who are expressly authorised to process such data in compliance with the applicable personal data protection legislation set out in Regulation (EU) 2016/679 (the "GDPR") and Italian Legislative Decree 196/2003, as amended by Italian Legislative Decree 101/2018.

In disciplinary proceedings, the identity of the Reporting Person may not be disclosed where the disciplinary charge is based on investigations that are separate from and additional to the report, even if they result from it.

Where the charge is based, in whole or in part, on the report and knowledge of the identity of the reporting person is essential for the defence of the accused, the report may be used for the purposes of the disciplinary proceedings only with the express consent of the reporting person to the disclosure of their identity. In this case, the reporting person is informed in writing of the reasons for the disclosure of the confidential data.

The reporting person is also informed of the disclosure of confidential data in internal and external reporting procedures where the disclosure of the identity of the Reporting Person and of the information is also essential for the defence of the person concerned.

Processing of personal data

All processing of personal data, including communication between the competent authorities, must be carried out in accordance with Regulation (EU) 2016/679 (GDPR).

The communication of personal data by the institutions, bodies, offices or agencies of the European Union is carried out in accordance with Regulation (EU) 2018/1725.

Reports and the related processing of data are handled by Hyphen-Integration S.r.l., as Data Controller, in compliance with the principles of necessity, proportionality and lawfulness of processing set out in the GDPR. In accordance with the principle of data minimisation under Article 5 GDPR, only personal data that are relevant and necessary for the purposes of this Policy may be processed.

Personal data that are manifestly not useful for handling a specific report are not collected or, if collected accidentally during the investigation, are deleted immediately.

When a Report is made, the Reported Person and other persons involved in the Report may not immediately receive a specific privacy notice regarding the processing of their data, where there is a risk that providing such a notice would compromise the ability to verify effectively whether the Report is well-founded or to gather the necessary evidence. Where possible, however, they must receive a privacy notice pursuant to Article 13 GDPR.

Private-sector entities that share resources for receiving and handling reports determine their respective responsibilities for compliance with personal data protection obligations in a transparent manner, by means of an internal agreement.

Retention of documentation

Reports and the related documentation are kept by the Managing Body for as long as necessary to handle the report and in any case for no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations and with personal data protection legislation.

When, at the request of the reporting person, the report is made orally during a meeting with the designated staff, it is documented by the designated staff, with the prior consent of the reporting person, by recording it on a device suitable for storage and playback or by means of minutes. In the case of minutes, the reporting person may check, correct and confirm the minutes of the meeting by signing them.

External reporting to ANAC

The Reporting Person may use the external reporting channel of ANAC (the Italian National Anti-Corruption Authority) only in the following cases:

– the activation of an internal reporting channel is not mandatory in their work context or, even if mandatory, it is not active or, even if activated, it does not comply with Article 4 of the Decree;

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- a report already made internally has not been followed up;
- the Reporting Person has reasonable grounds to believe that, if they made an internal report, it would not be effectively followed up or that the report itself could give rise to a risk of retaliation;
- the Reporting Person has reasonable grounds to believe that the violation may constitute an imminent or manifest danger to the public interest.

An external report can be made to ANAC through the dedicated page: www.anticorruzione.it/-/whistleblowing.