



WHISTLEBLOWING POLICY SIAC S.p.A.

**Procedure pursuant to EU Directive 2019/1937 and Legislative
Decree no. 24/2023.**

December 2023

A. PURPOSE AND SCOPE

The purpose of this procedure is to establish and regulate internal reporting channels pursuant to EU Directive 2019/1937 and Legislative Decree 24/2023¹, which guarantee the confidentiality of the identity of the reporting person and of the people involved and/or mentioned in the report, as well as the content of the report and the related documentation. The presence of these channels complies with specific regulations and contributes to strengthening the principles of legality, transparency and responsibility of Siac S.p.A.

This procedure regulates the reporting management process, ensuring that it occurs in the manner and within the timeframes established by the legislation in force from time to time. The procedure applies to all reports received by Siac S.p.A., through the reporting channels specifically established and described here.

The responsibility for maintaining confidentiality, giving feedback to the reporter and managing the report remains with the person in charge of managing the reporting channel.

Furthermore, the possibility for the reporting entity to use external reporting channels established by the Italian authorities is recognised.

In order to guarantee maximum dissemination, this procedure is published on the Siac S.p.A. website and in the Zucchetti portal.

¹ *Legislative Decree 10 March 2023, n.24 – Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, concerning the protection of persons who report violations of Union law and containing provisions regarding protection of people who report violations of national regulatory provisions.*

B. ABBREVIATIONS AND DEFINITIONS

ANAC: National Anti-Corruption Authority in Italy.

Facilitator: natural person who assists a reporting person in the reporting process in a work context and whose assistance must be confidential.

DRU: Human Resources Management Siac S.p.A.

Information on violations: information, including well-founded suspicions, regarding violations committed or which, based on concrete elements, could be committed in Siac S.p.A., as well as elements regarding conduct aimed at concealing such violations.

MOGC: Organization, Management and Control Model pursuant to Legislative Decree 231/01 of Siac S.p.A.

Supervisory Body: Supervisory Body of Siac S.p.A., pursuant to Legislative Decree 231/01 and the MOGC of Siac S.p.A.

Person involved: the natural or legal person mentioned in the report as the person to whom the violation is attributed or as the person otherwise implicated in the reported violation.

Reporting person: the natural person making the report.

Reporting manager: person who receives and manages an internal report.

Feedback: communication to the reporting person of information relating to the follow-up that is given or that is intended to be given to the report.

Retaliation: any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report and which causes or may cause, directly or indirectly, unfair damage to the reporting person.

Follow-up: the action taken to evaluate the existence of the reported facts, the outcome of the investigations and any measures adopted.

Reporting: written or oral communication of information on possible violations.

Violations: behaviors, acts or omissions related to the activity of Siac S.p.A. which harm the public interest or the integrity of the public administration or of Siac S.p.A. itself.

C. RESPONSIBILITY

The **Human Resources Department** of Siac S.p.A. is mainly responsible for the following activities:

- Ensure the updating, conservation and dissemination of this procedure.
- Ensure the establishment and maintenance of reporting channels based on Legislative Decree 24/2023.
- Guarantee the receipt, registration and acknowledgment of receipt of the report to the reporting party within the established deadlines.
- Preliminary evaluation of the reports received and the area of competence.
- Follow up on the report, through investigations and any internal investigations.
- Guarantee the closure of the report and related feedback to the reporter within the established deadlines.
- Guarantee the obligation of confidentiality.
- Guarantee the prohibition of retaliation and the other protections provided in favor of the whistleblower based on Legislative Decree 24/2023.

The **Supervisory Body of Siac S.p.A.**, involved only for reports relating to the MOGC of Siac S.p.A. is contributorily responsible for the following activities:

- Preliminary evaluation of the reports received and the area of competence.
- Follow up on the report, through investigations and any internal investigations.
- Guarantee the closure of the report and related feedback to the reporter within the established deadlines.
- Guarantee the obligation of confidentiality.
- Guarantee the prohibition of retaliation and the other protections provided in favor of the whistleblower based on Legislative Decree 24/2023.

The **Competent Body**, involved ad hoc, is responsible on a contributory basis for the following activities:

- Preliminary evaluation of the reports received and the area of competence.
- Follow up on the report, through investigations and any internal investigations.
- Guarantee the closure of the report and related feedback to the reporter within the established deadlines.
- Guarantee the obligation of confidentiality.
- Guarantee the prohibition of retaliation and the other protections provided in favor of the whistleblower based on Legislative Decree 24/2023.

D. OPERATIONAL METHODS

D.1 INTERNAL SIGNALING CHANNEL

Siac S.p.A. has activated an internal reporting channel using IT methods, which can be reached via the Company's website: www.siac-group.com.

Through this channel, reports can be made and detailed in written form; alternatively, the whistleblower can decide to make the report verbally, by requesting a direct meeting with Siac's Human Resources Department. For technical information, please refer to the instructions on the Siac S.p.A. website, in the section "Whistleblowing channel".

ENTITY WHO IS ENTRUSTED WITH THE MANAGEMENT OF THE CHANNEL

The management of the internal reporting channel is entrusted to the DRU of Siac S.p.A., as a dedicated independent office with staff specifically trained for the management of the reporting channel.

REPORTING PARTIES²

Reports can be made by subjects linked to Siac's activity, such as: employees; self-employed workers, collaborators, freelancers and consultants; employees or collaborators of suppliers, contractors; clients; interns; shareholders and people with administrative, management, control, supervisory or representative functions.

SUBJECT OF THE REPORT

The report may concern behaviours, acts or omissions linked to the activity of Siac S.p.A. in the following areas:

- violations of specific national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or of Siac S.p.A.³;
- violations of the Siac Organization, Management and Control Model, pursuant to Legislative Decree 231/01⁴
- violations of other corporate codes of conduct, policies and procedures for which the reporting channel is provided (for example: Code of Ethics, Privacy Policy).

Reports will be processed within the deadlines established by current legislation⁵.

² For further details, please refer to the art. 3 of Legislative Decree 24/2023

³ In particular, this means:

a) violations of national and European provisions which consist of offenses concerning the following sectors: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental Protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems.

b) violations of European provisions which consist of: i) acts or omissions detrimental to the financial interests of the Union; ii) acts and omissions concerning the internal market; iii) acts and behaviors that nullify the object or purpose of the provisions of Union acts in the sectors mentioned above;

c) violations of national provisions which consist of: i) administrative, accounting, civil or criminal offences; ii) significant illicit conduct pursuant to Legislative Decree 231/2001 or violations of organizational and management models

⁴ Legislative Decree 8 June 2001, n.231: Discipline of the administrative liability of legal persons.

⁵ For further details, please refer to art.2 c.1 a) of Legislative Decree 24/2023.

D.2 REFERENCE PRINCIPLES

CONFIDENTIALITY OBLIGATION⁶

The reports can be used by those who manage the channel exclusively to follow up on them, with the express prohibition of revealing the identity of the reporter.

The identity of the reporting person and any other information from which such identity can be deduced, directly or indirectly, cannot be revealed, without the express consent of the reporting person, to persons other than those competent to receive or follow up on the reports.

The identity of the people involved and the people mentioned in the report is also subject to the same protections and guarantees of confidentiality.

PROTECTION OF THE REPORTER

The reporting person cannot suffer any retaliation and is protected by specific regulatory provisions⁷, including for example the nullity regime for any retaliatory acts suffered in violation of this prohibition.

The protections also apply to facilitators of the report, to the reporter's work colleagues and to people in the same working context who are linked to the reporter by a stable emotional or kinship bond within the fourth degree and to entities owned by the reporter.⁸

Specific protection and support measures for reporting persons are also envisaged by the National Anti-Corruption Authority (ANAC); in particular, the whistleblower can benefit free of charge from the assistance and consultancy of third sector bodies and can communicate to ANAC the retaliation he believes he has suffered so that measures can be taken⁹.

PROTECTION FROM BAD FAITH REPORTS

The protections of the previous paragraph apply only if at the time of the report the reporting person had reasonable grounds to believe that the information on the reported violations was true and fell within the scope of application of the procedure.

In the event that criminal or civil liability is ascertained, even with a first degree sentence, of the reporting person for the crimes of defamation or slander, in cases of fraud or gross negligence, the protections are no longer guaranteed and the reporting person may disciplinary sanction be imposed¹⁰.

⁶ For further details, please refer to the art. 12 of Legislative Decree 24/2023

⁷ For further details, please refer to the art. 17 of Legislative Decree 24/2023

⁸ For further details, please refer to the art. 3 of Legislative Decree 24/2023

⁹ For further details, see articles 18 and 19 of Legislative Decree 24/2023

¹⁰ For further details, see art. 16 c.3 of Legislative Decree 24/2023

D.3 MANAGEMENT OF THE INTERNAL REPORTING CHANNEL

SENDING AND RECEIVING THE REPORT

As indicated in paragraph D1, the report can be made by accessing the Siac S.p.A. website, in the section "Whistleblowing channel".

Anonymous reports cannot be taken into consideration.

The report can be made in written form, via the "Whistleblowing channel" button, or the reporter can choose to make the report in verbal form, requesting a direct meeting with the DRU via email (wb@siac-group.com).

In the event of a report being made online in written form, DRU will issue the reporting person with an acknowledgment of receipt of the report within 7 days of the date of receipt.

In the event of a request for a meeting with the DRU to make a verbal report, the DRU will contact the reporting party within 30 days of the date of the request.

PRELIMINARY ASSESSMENT OF THE REPORT

All reports are subject to preliminary assessment by the Human Resources Department for:

- evaluate whether the information received falls within the scope of this procedure; otherwise a timely response is provided to the reporter and the report is archived;
- evaluate whether the report falls within the scope of application of the Organization, Management and Control Model for the purposes of Legislative Decree 231/01; in this case, the report is also notified to the Supervisory Body of Siac S.p.A. who may have access to the contents of the report, as the body responsible for managing such reports;
- evaluate whether there are the conditions to proceed with further checks: if any additions and/or clarifications are necessary, the reporting party can be contacted; in the event of no response, the report will be archived providing timely feedback to the person reporting.

VERIFICATION AND FOLLOW-UP OF THE REPORT

If there are the conditions to proceed, an internal verification is established. The check must be conducted by qualified personnel from Siac S.p.A.'s DRU.

The involvement of other people, internal to the Siac Group or external with specific skills and/or responsibilities in the verification, is only possible after informing the whistleblower.

The DRU evaluates from time to time which information from the report must be shared with the other bodies involved, purely for verification purposes and always through the platform; in the event that it is necessary to also share the identity of the reporter, the authorization of the reporter is required. During the verification DRU maintains discussions with the reporting person and may request additions.

The person involved can be heard, or, at his request, is heard, through the acquisition of written observations and documents, possibly contacting the whistleblower.

CLOSURE OF REPORTING

The procedure initiated following receipt of the report must be concluded, providing feedback to the reporting party, within 3 months from the date of the acknowledgment of receipt.

In the event that the related investigation and analysis necessarily requires a time greater than 3 months, it must be promptly communicated to the reporting party, indicating the reasons and providing in any case an update regarding the progress of the investigation and the planned closure times.

It is understood that each report will be treated diligently, evaluating the existence of the facts reported, the outcome of the investigations and any measures adopted.

STORAGE OF DOCUMENTATION

The information and documentation related to the report, as well as the information flows with the bodies involved in the verification, are managed and stored guaranteeing the maximum level of security and confidentiality, in compliance with the provisions of the art. 14 of the Decree.

The reports and the related documentation are kept for the time necessary to process the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure.

PERIODIC REPORTING

The DRU maintains a generic and periodic report on the reports received, without information from which the identity of the reporter and the person reported can even be deduced. This report is periodically sent to the President of Siac S.p.A., to the Managing Director of Siac S.p.A. and to the institutional bodies of competence and control of Siac S.p.A.

D.4 EXTERNAL SIGNALING CHANNEL

The reporting person can also make an external report to the ANAC if specific conditions are met, including:

- a) the internal reporting channel is not active or does not comply with the regulations;
- b) the reporting person has already made an internal report and it has not been followed up on;
- c) the reporting person has reasonable grounds to believe that, if he/she made an internal report, it would not be followed up effectively or that the same report could lead to the risk of retaliation;
- d) the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

For further details, please refer to the content of Legislative Decree 24/2023 and the ANAC Guidelines.

D.5 PROCESSING OF PERSONAL DATA

The processing of personal data relating to the receipt and management of reports is carried out in accordance with Regulation (EU) 2016/679.