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WHISTLEBLOWING POLICY

Procedure for making and managing reports of violations pursuant to Legislative Decree no.
24/2023

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1. INTRODUCTION

With Legislative Decree no. 24 of 10 March 2023, published in the Official Journal on 15 March 2023, EU Directive 2019/1937 on "the *protection of persons who report violations of Union law*" has been transposed into our legislation.

The objective of the European directive is to establish common minimum standards to ensure a high level of protection for persons who report breaches of European Union law, creating secure communication channels for this purpose.

DGA S.p.a. (hereinafter also simply "**DGA**"), in compliance with the aforementioned legislation and with a view to adopting measures aimed at combating and preventing illegal phenomena within it, which favour the emergence of harmful conduct – of which the whistleblower has become aware in the workplace – potentially detrimental to the integrity of the Company and, more generally, to the public interest, has adopted its own policy regulating the methods of making and managing reports of significant violations pursuant to Legislative Decree no. 24/2023.

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2. PURPOSE

The purpose of this document is to regulate the methods of making and managing reports of violations of national or European regulatory provisions detrimental to the public interest or the integrity of DGA, as well as to regulate the protection measures of the people who make the reports, in line with the provisions of Legislative Decree no. 24/2023.

This policy also aims to:

- contribute to creating a corporate culture based on transparency and legality;
- involve all employees and third parties in an activity to combat illegality, through active and responsible participation.

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3. REGULATORY REFERENCES

- Directive (EU) of the European Parliament and of the Council of 23 October 2019, no. 1937, on the protection of persons reporting breaches of Union law;
- Legislative Decree no. 24 of 10 March 2023, “*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 for the protection of persons who report breaches of national regulatory provisions*”;
- Regulation (EU) no. 679/2016 of the Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data;
- Legislative Decree no. 196 of 30 June 2003, on the protection of personal data.

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4. DEFINITIONS

For the purposes of this document, the following definitions apply:

- **Work context** – the present or past work or professional activities through which, regardless of the nature of such activities, a person acquires information about violations and in the context of which they could risk retaliation in the event of reporting, public disclosure, or reporting to the judicial or accounting authority.
- **Public disclosure** – disseminating information about violations in the public domain through the press or electronic means, or in any case through means of dissemination capable of reaching a large number of people.
- **Facilitator** – a natural person who assists a reporting person in the reporting process, operating within the same working context and whose assistance must be kept confidential.
- **Information on violations** – information, including well-founded suspicions, concerning violations committed or which, on the basis of concrete elements, could be committed in the organisation with which the reporting person or the person making a complaint to the judicial or

accounting authority maintains a relevant legal relationship pursuant to Legislative Decree no. 24/2023, as well as elements concerning conduct aimed at concealing such violations.

- **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 violation is attributed, or as a person in any case involved in the violation reported or publicly disclosed.
- **Connected person** – the Facilitators, the persons who work in the same Work Context and who are linked to the Whistleblower by a stable emotional bond, by a relationship of kinship within the fourth degree, or by a habitual and current relationship, as well as the entities owned by the Whistleblower or the entity for which the Whistleblower works or who in any case operate in the same Work Context.
- **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 due to the report, complaint to the judicial or accounting authority or public disclosure, and which causes or may cause the reporting person or the person who made the complaint, directly or indirectly, unfair damage.
- **Whistleblower** – the natural person who makes the report or public disclosure of information about violations acquired within their work context.
- **Reporting** – any communication, written or oral, concerning information on behaviour, active or omitted, with regard to which there is certainty or reasonable suspicion that they constitute violations pursuant to Legislative Decree no. 24/2023.
- **External reporting** – the communication, written or oral, of information on violations, submitted through the external reporting channel activated by ANAC – National Anti-Corruption Authority – www.anticorruzione.it.
- **Internal reporting** – the communication, written or oral, of information about violations, submitted through internal reporting channels.

- **Follow-up** – the action taken by the person entrusted with the management of the reporting channel to assess the existence of the reported facts, the outcome of the investigations and any measures taken.
- **Violations** – conduct, acts or omissions that harm the public interest or the integrity of the public administration or private body, as better defined in paragraph 6.

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5. RECIPIENTS

This document applies to all employees of DGA and, by virtue of a specific contractual clause, to all those who have independent work, collaboration and professional consulting relationships with the Company, as well as to all persons who work at DGA.

This document is also applicable to all DGA shareholders, as well as to all persons who perform, even *de facto*, functions of administration, direction, control, supervision or representation of the Company.

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6. SUBJECT OF THE REPORT

Violations or risks of violation of national or European regulatory provisions that harm the public interest or the integrity of DGA may be reported, in the manner indicated in this document. In particular, in compliance with the provisions of art. 3, Legislative Decree no. 24/2023, the following may be reported:

- a) offences falling within the scope of European Union or national acts, or national acts constituting implementation of European Union acts, in the following areas:
 - public procurement;
 - financial services, products and markets;
 - prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - public health;

- consumer protection;
 - protection of personal data;
 - security of the network and information systems;
 - protection of privacy;
 - transport safety;
 - environmental protection;
 - radiation protection and nuclear safety;
 - food and feed safety;
 - animal health and welfare:
- b) acts or omissions affecting the financial interests of the European Union referred to in Article 325 of the Treaty on the Functioning of the European Union specified in the relevant secondary legislation of the European Union;
- c) acts or omissions concerning the internal market, as referred to in Article 26 par. 2 of the Treaty on the Functioning of the European Union, including breaches of European Union competition and state aid rules;
- d) violations concerning the internal market related to acts that violate corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax legislation;
- e) acts or behaviours that defeat the object or purpose of the aforementioned regulatory provisions.
- The following may also be subject to reporting (the "**Other Violations**"):
- a) acts of retaliation against persons who in good faith inform of possible violations and/or irregularities;
 - b) discriminatory acts;
 - c) incidents of harassment or mobbing.

Disputes, claims or requests related to a personal interest of the whistleblower, relating exclusively to their employment relationships, are excluded from the scope of this document. Such complaints may be communicated using the ordinary channels to the competent company functions.

In any case, unfounded reports made with intent or gross negligence are prohibited. In such cases, the Whistleblower will not be granted the protection measures provided for in this policy and (s)he will be subject to the disciplinary consequences referred to in paragraph 12.

* * *

7. THE PERSONS ENTITLED TO MAKE THE REPORT

Reports may be made by those who have or have had working and/or collaboration relationships with DGA. More specifically, the following are entitled to make reports pursuant to this document:


- a) employees;
- b) independent workers;
- c) collaborators pursuant to art. 409, paragraph I, no. 3, of the Code of Civil Procedure;
- d) freelancers and consultants;
- e) volunteers and trainees;
- f) shareholders;
- g) persons with administrative, management, control, supervisory or representative functions.

Reports can also be made before and regardless of the establishment of the employment relationship, where they concern information acquired during the selection and/or probationary period, as well as after the dissolution of the legal relationship if the information on the violations was acquired during the relationship itself.

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8. THE INTERNAL REPORTING CHANNELS

Legislative Decree no. 24/2023 provides, in art. 4, paragraph I, that private sector entities activate *"their own reporting channels, which guarantee, also through the use of encryption tools, the confidentiality of the identity*

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of the reporting person, the person involved and the person in any case mentioned in the report, as well as the content of the report and the related documentation".

Article 4, paragraph 3, also provides that such reports may be made in written form *"including by computer"*, or in oral form, through dedicated telephone lines, voice messaging systems or, at the request of the Whistleblower, through a direct meeting with the person managing the internal reports.

DGA, in accordance with the provisions of current legislation, has provided the following internal reporting channels:

- *"Legality Whistleblowing"* platform, accessible through the following link <https://dga.segnalazioni.net/>. Through the aforementioned platform, the Whistleblower may, after registration, proceed with the formalisation of the Report in two ways:
 - a) in written form, using some guided fields to be filled in, to ensure that the report is made as complete and detailed as possible;
 - b) in oral form, by recording an audio message.
- direct meeting with the manager of internal Reports, in a place suitable to guarantee their confidentiality, upon request to be made by email to the address salvatore.paratore@advisors.it, indicating in the subject the words *"Confidential – DGA S.p.a. – Whistleblowing"* and taking care to use an email address different from the company one.


Regardless of the specific method chosen, the confidentiality of the identity of the Whistleblower, the content of the Report and the related documentation is in any case guaranteed as specified in the following paragraph 14.1.

* * *

9. EXTERNAL REPORTING

The subjects referred to in paragraph 7 may submit an external Report, through the reporting channel activated for this purpose by the National Anti-Corruption Authority (ANAC), only if one of the following conditions is met:

- a) an internal reporting channel is not active;

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- b) the Whistleblower has already made an internal Report and it has not been followed up;
- c) the Whistleblower has reasonable grounds to believe that, if (s)he made an internal Report, it would not be effectively followed up or that the same Report may lead to a risk of retaliation against him/her;
- d) the Whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

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10. PUBLIC DISCLOSURE

The subjects referred to in paragraph 7 may also make a Report by public disclosure, only when one of the following conditions is met:


- a) the Whistleblower has previously made an internal and/or external Report without having received feedback within the terms provided for by Legislative Decree no. 24/2023, regarding the measures envisaged or adopted to follow up on the Report;
- b) the Whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest;
- c) the Whistleblower has reason to believe that the External Report may involve the risk of retaliation or may not have effective follow-up due to the specific circumstances of the specific case, such as those in which evidence may be concealed or destroyed or in which there is a well-founded fear that the person who received the Report may be in collusion with the perpetrator of the violation or involved in the violation itself.

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11. REPORT MANAGEMENT

The Reporting process consists of the following phases:

- 1) receiving and taking charge of the Report;
- 2) preliminary assessment of the Report;

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- 3) assessment of the reported violation;
- 4) outcome of the investigations carried out;
- 5) actions resulting from the assessment activity.

11.1 Person in charge of the management of the Report

Pursuant to Article 4, paragraph 2, of Legislative Decree no. 24/2023, the "*management of the reporting channel is entrusted to a person or a dedicated autonomous internal office with specifically trained personnel for the management of the reporting channel, or it is entrusted to an external entity, also autonomous and with specifically trained personnel*".

In line with the provisions of the aforementioned regulation, DGA has entrusted the receipt and management of the Reports to Salvatore Paratore, attorney, in his capacity as Chairman of the Board of Auditors, as an external entity with autonomy and specific skills in the field.

In the event of a report submitted to a different subject, the latter shall, without delay and in any case no later than 7 (seven) days from its receipt, transmit it to the internal Reporting Manager, giving simultaneous notice of the transmission to the Whistleblower.


11.2 Receipt and acceptance of the Report

In the event of a Report made in writing or orally through the *Legality Whistleblowing* platform, the software records the Report and sends a notification to the internal Report manager, who shall, within no later than 7 (seven) days, issue the Whistleblower notice of receipt of the Report.

In the case of a Report made orally by means of a request for a direct meeting with the internal Report manager, the latter – with the consent of the Whistleblower – documents the Report by recording it on a device suitable for storage and listening or by means of a report to be submitted to the Whistleblower so that (s)he can verify, rectify and possibly confirm its content by signing.

Where necessary, the internal Report manager shall also:

- (i) ascertain the ways in which the Whistleblower prefers to continue the dialogue;
- (ii) provide all the necessary information regarding the subsequent phases of the management process of the Report;

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(iii) provide all the necessary information on the measures taken to protect the Whistleblower.

11.3 Preliminary assessment of the Report

Once the Report has been taken in charge, the internal Report manager carries out a preliminary assessment of the relevance of the Report.

To this end, where appropriate in order to substantiate the Report, the internal Report manager may make requests for clarification or additional information.

In the event that the Report does not fall within the scope of this policy, the internal Report Manager notifies the Whistleblower, specifying the reasons and possibly indicating the company function responsible for resolving the reported problem; then, the internal Report manager prepares a specific report that is sent to the administrative body and proceeds to file the Report, keeping track of it – in anonymised form – in a special register (the "**Report Register**"). Written notification of the archiving of the Report is given to the Whistleblower.

Where the internal Report manager considers that the Report is relevant and pertinent, (s)he shall carry out the necessary investigations for this purpose.


In the presence of several Reports to be handled at the same time, the internal Report manager evaluates the order of priority taking into account the probability – according to a preliminary assessment – that the violation has actually occurred, as well as its possible impact on DGA.

11.4 Assessment of the reported violation

If, following the preliminary analysis, the Report appears to be well-founded and relevant, the internal Report manager proceeds with the necessary inquiries and internal investigation activities.

To this end, by way of example but not limited to, the internal Report manager shall:

- a) involve the affected company functions, unless this does not compromise the trust of the Whistleblower, the impartiality of the internal Report manager or the success of the investigation;
- b) collect the necessary documentary evidence;
- c) interview people able to report useful information for the purpose of ascertaining the violation committed;

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- d) maintain a constant dialogue with the Whistleblower, requesting, where necessary, additional supplementary information.

In any case, no later than three months from the date of the notice of receipt of the Report (or, in the absence of such notice, no later than three months from the expiry of the seven-day period from the submission of the Report), the internal Report manager shall inform the Whistleblower – if it is not already filed or subject to measures pursuant to the following paragraph 11.6 – of the progress of the Report, specifying the activity carried out and the activity (s)he intends to carry out.

All parties involved in the investigation activities are required to cooperate fully with the internal Report manager.

In carrying out these activities, the internal Report manager may request the collaboration of external parties with the specific skills required by the specific case.

11.5 Outcome of the investigations carried out


At the end of the investigation activities, the internal Report manager prepares a final report that is sent to the Administrative Body, in which the activity carried out for the management of the Report is described, as well as the outcome of the investigations carried out. In particular, the internal Whistleblower reports on:

- a) the non-existence of the reported violation, specifying whether the Report is considered to have been made with intent or gross negligence, for the purposes of the possible application of disciplinary sanctions;
- b) the existence or risk of happening of the reported violation, specifying the person held responsible and the evidence collected for this purpose.

The final report shall not mention the identity of the Whistleblower and other suitable information to identify him/her, unless it is considered that the Report was made with intent or gross negligence.

11.6 Actions resulting from the assessment activity

The Administrative Body, having examined the final report, evaluates the adoption of the appropriate measures to manage the results of the assessment of the reported violation. In particular, the Administrative Body:

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- a) in the event of incompleteness of the investigations of the internal Report manager, carries out further investigations, also through the competent company departments and/or external consultants or professionals;
- b) in the event of an established violation or an established risk of violation, takes all appropriate measures to prevent, interrupt or remedy the violation, including disciplinary measures against the subjects held responsible;
- c) if there is deemed to be a real risk of retaliation, takes appropriate measures to protect the Whistleblower;
- d) in the event of ascertained retaliation, implemented or even threatened, against the Whistleblower, adopts appropriate measures to remedy the retaliation suffered, as well as appropriate disciplinary measures against the subjects held responsible for the retaliation;
- e) in the event of a Report made with intent or gross negligence, takes the appropriate disciplinary measures against the Whistleblower.

The Administrative Body communicates the actions taken to the internal Report manager, so that (s)he gives timely information to the Whistleblower.

The internal Report manager monitors the implementation and effectiveness of the measures identified by the Administrative Body.

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12. DISCIPLINARY SYSTEM

Violations of this policy assume disciplinary relevance and entail the imposition of disciplinary sanctions in accordance with the provisions of the company disciplinary system or the national collective bargaining agreement (CCNL) applicable in this case.

By way of example and not limited to, the following constitute a violation punishable by the imposition of a disciplinary sanction:

- a) the making of Reports in bad faith, or with intent or gross negligence;

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- b) the making of a Report of which the Judicial Authority has ascertained, even with a judgement of first instance, the defamatory or slanderous nature;
- c) the disclosure of the identity of the Whistleblower, the Connected Persons or the Persons involved, except in cases where this is expressly permitted;
- d) the adoption of retaliatory behaviour or acts;
- e) any behaviour aimed at hindering the Report;
- f) failure to manage the Report for wilful misconduct or gross negligence, including failure to adopt and implement appropriate measures to prevent, interrupt or remedy the Violation.

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13. MEASURES FOR THE PROTECTION OF THE WHISTLEBLOWER AND THE PERSONS INVOLVED

13.1 Protection of the Whistleblower

The Whistleblower is entitled to the protection measures provided for in this document, provided that the following conditions are met:

- a) at the time of the Report or complaint to the judicial or accounting authority or of the public disclosure, the reporting person or whistleblower had founded reason to believe that the information on the Violations which was communicated, publicly disclosed or reported was true and fell within the objective scope of application of this policy;
- b) the Report or public disclosure was made under the conditions set out, respectively, in paragraphs 6, 9 and 10.

Specifically, the following protection measures are provided for the Whistleblower:

- Confidentiality of the identity of the Whistleblower – except in the cases expressly provided for in paragraph 14.1, the identity of the Whistleblower is kept strictly confidential and is not disclosed to persons other than those competent to receive and manage the Reports.
- Prohibition of Retaliation – the Whistleblower cannot suffer any Retaliation for the sole fact of having made the Report. By way of non-exhaustive example, the following are acts of Retaliation:

- dismissal, suspension or equivalent measures;
 - demotion or non-promotion;
 - the change of functions, the change of the workplace, the reduction of salary, the change of working hours;
 - the suspension of training or any restriction of access to it;
 - negative notes of merit or negative references;
 - the adoption of disciplinary measures or other sanctions, including financial penalties;
 - coercion, intimidation, harassment or ostracism;
 - discrimination or in any case unfavourable treatment;
 - failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;
 - the non-renewal or early termination of a fixed-term employment contract;
 - damage, including to the person's reputation, in particular on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income;
 - placing on improper lists on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in the sector or industry in the future;
 - the early conclusion or cancellation of the contract for the supply of goods or services;
 - the cancellation of a licence or permit;
 - the request to undergo psychiatric or medical investigations.
- Protection from Retaliation – if the Whistleblower believes (s)he is victim of Retaliation, (s)he may notify the ANAC, which informs the National Labour Inspectorate for the measures within its competence. In any case, the retaliatory acts are null and void and the Reporting Person is entitled

to the cessation of the retaliatory conduct, to compensation for any damage suffered and, in the event of dismissal determined by an act of Retaliation, to reinstatement in the workplace.

In the context of disputes established by the Whistleblower who believes to have suffered a Retaliation for having made a Report, the burden of proof regarding the legitimacy of the reasons for the act considered retaliatory, as well as its extraneousness with respect to the Report, is borne by the employer.


Waivers and transactions, in whole or in part, concerning the rights and protections provided for in this document are valid only when carried out in the forms and in the manner provided for by Art. 2113, paragraph 4, of the Italian Civil Code.

- Limitations of liability – in the event that in order to make the Report it is necessary to disclose or disseminate information on the Violations covered by confidentiality obligations (without prejudice to the application of the provisions on classified information, forensic and medical professional secrecy and secrecy of the deliberations of the courts provided for by national or European Union provisions) or relating to the protection of copyright or the protection of personal data, or information suitable to damage the reputation of the Person involved, any criminal, civil and administrative liability of the Whistleblower is excluded, provided that such information is linked to the Report and strictly necessary to reveal the Violation and provided that it has been acquired lawfully.

The making of the Report does not exclude any criminal, civil or administrative liability on the part of the Whistleblower for acts or omissions unrelated to the Report or that are not strictly necessary for the purposes of the disclosure of the Violation.

- Support measures – the list of Third Sector Entities (available on the ANAC website) is established by the ANAC, and provides the Reporting Persons with support measures such as information, assistance and advice free of charge on how to carry out the Report, on protection from retaliation, on the rights of the Person involved, as well as on the methods and conditions of access to State-funded legal aid.

The protection measures provided for in this document are also applicable in cases of anonymous Report if the Whistleblower has been subsequently identified and has suffered from Retaliation.

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13.2 Protection of the reported person

In order to avoid potential harmful situations within the scope of its work context, DGA ensures the Person involved:

- the right to be informed, within a reasonable period of time, about the charges as well as any disciplinary sanctions adopted against him/her;
- the right to defend himself/herself, bringing to the attention of the Administrative Body his/her own version of the facts and any proof or documentary evidence useful for this purpose.

13.3 Protection of Connected Persons

Within the limits of what is provided for by law, the protection measures put in place to protect the Whistleblower are also applicable to Connected Persons.


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14. PROTECTION OF CONFIDENTIALITY AND PERSONAL DATA

14.1 Obligation of confidentiality

The identity of the Whistleblower and any other information from which such identity may be inferred, directly or indirectly, cannot be disclosed without the express consent of the Whistleblower, to persons other than those competent to receive or follow up on the Reports, unless, as a result of the investigations carried out by the internal Report manager, it emerges that the Whistleblower has made the Report in bad faith, or a responsibility of the Whistleblower emerges, also in conjunction with others, in relation to the reported Violation.

Within the framework of the disciplinary procedure, the identity of the Whistleblower cannot be revealed where the dispute of the disciplinary charge is based on separate and additional findings with respect to the Report, even if consequent to the same. If the dispute is based, in whole or in part, on the Report and the knowledge of the identity of the Whistleblower is essential for the defence of the accused person, the Report will be usable for the purposes of disciplinary proceedings only in the presence of the Whistleblower's express consent to the disclosure of his/her identity.

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The same measures to protect the confidentiality of identity are also guaranteed to the Person involved and to any other person mentioned in the Report until the conclusion of the proceedings initiated by reason of the Report itself.

14.2 Processing of personal data

All processing of personal data provided for by virtue of the activities described in this document is carried out in accordance with the privacy provisions of Regulation (EU) 2016/679, Legislative Decree no. 196/2003 and Legislative Decree no. 51/2018.

DGA, as Data Controller, implements and organises the management activities of the Reports in accordance with the aforementioned legislation, in compliance with the principles of necessity, proportionality and lawfulness of the processing, also guaranteeing the exercise by the interested parties of their rights referred to in Articles 15 and ff. of Regulation (EU) 2016/679.

Personal data that are manifestly not useful for the processing of a specific Report are not collected and, if accidentally collected during the investigation phase, they are deleted immediately.

Responsible for the processing of personal data pursuant to art. 28, Regulation (EU) 2016/679, are the company DigitalPA S.r.l., as provider of the internal Reporting channel (the "*Legality Whistleblowing*" platform) and Salvatore Paratore, attorney, as manager of internal Reports.


The information on the processing of personal data resulting from the submission of a Report is made available to all interested parties within the platform for the management of Reports (available at the link <https://dga.segnalazioni.net/>), as well as on the company website (available at the link <https://www.dga.it/it/>).

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15. CONSERVATION OF DOCUMENTATION

The Reports and the related documentation are kept for the time strictly necessary for the processing of the Report and in any case for no more than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality measures referred to in paragraph 14.1.

In any case, the Reports are not used beyond what is necessary to give adequate follow-up to them.

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The internal Report manager keeps track, anonymously, of the Reports received in the specific Report Register, in which (s)he merely indicates the subject of the Report, the timing of its management, the outcome of the assessment and any measures and consequent actions taken.

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16. **DISSEMINATION**

This document is made available to all company staff and all interested *stakeholders* of DGA by publication on the company website (available at the link <https://www.dga.it/it/>).