

**Procedure for Reporting and
Handling Alleged Violations of
ENERWAVE Codes**



**NOVEMBER 2025
(Version 2)**

Contents

1.	Subject Matter.....	6
1.1	Brief Description.....	6
1.2	Structure	6
1.3	Linkage.....	6
1.4	Enforceability.....	6
2.	Definitions.....	7
3.	Purpose & Principles	10
3.1	Purpose	10
3.2	Objectives.....	10
3.3	Principles	11
4.	Scope	12
4.1	Personal Scope.....	12
4.2	Material Scope	12
4.3	Indicative Areas of Reporting.....	12
5.	Roles, Responsibilities and Competencies.....	13
5.1	Organizational Structure	13
5.2	Competencies.....	14
6.	Reporting alleged violations & Feedback Channels.....	16
6.1	Reporting Channels	16
6.2	Choice of Reporting Channel.....	17
6.3	Form / Content of Reporting.....	17
6.4	Durability.....	17
6.5	Security of Channels	17

6.6	Feedback Channels	18
6.7	Third Party Operators.....	18
7.	Reporting & Feedback.....	19
7.1	Reporting & Feedback Actions	19
7.2	Veracity	19
7.3	Preliminary Feedback.....	19
7.4	Final Feedback.....	19
7.5	Extension of Feedback Deadline	19
7.6	External Reporting	20
8.	Handling of Alleged Violations	21
8.1	Process description	21
8.2	Compliance Officer Actions	21
8.3	Compliance Committee Actions	22
8.4	Investigative Report.....	23
8.5	Risk Assessment	23
8.6	Repetitive or Ancillary Reports	23
8.7	Priority	23
9.	Completion.....	24
9.1	Completion Actions	24
9.2	Remedial Actions	24
9.3	Reporting of Criminal Offences	24
9.4	Record-Keeping	24
10.	Protection of Reporting Persons	26
10.1	Right to Report	26

10.2	Confidentiality	26
10.3	Measures against Hindering of Reporting.....	26
10.4	Non-Retaliation	26
10.5	Deterrence.....	27
10.6	Accountability	27
10.7	Right to Seek Effective Remedy.....	27
10.8	Access to Justice	27
10.9	Extension of Protection	27
11.	Rights of Persons Concerned	28
11.1	Protection of Fundamental Rights	28
11.2	Confidentiality	28
11.3	Right of Access.....	28
11.4	Proof of Misconduct.....	28
11.5	Right to be Heard.....	28
11.6	Right to Seek Effective Remedy.....	28
12.	Data Protection	29
12.1	Reporting	29
12.2	Protection of Personal Data.....	29
12.3	Transparency of Processing.....	29
12.4	Data Collected during Telephone Calls.....	29
12.5	Data Collected during Physical Meetings.	29
12.6	Irrelevant or Accidentally Collected Data.....	29
12.7	Privacy by Design and by Default	30
12.8	Confidentiality and Security of Data.....	30

12.9	Recipients of Data.....	30
12.10	Data retention periods.....	31
12.11	Data Subjects' Rights.....	31
13.	Transparency.....	32
13.1	Whistleblowing Notice.....	32
13.2	Right to be Informed.....	32
14.	General Terms.....	33
14.1	Training.....	33
14.2	Interpretation.....	33
14.3	Modifications.....	33
14.4	Subsidiarity.....	33
14.5	External Reporting.....	33
14.6	Relationship with Labor Law.....	33
14.7	Non-Waiver.....	34
14.8	Entry into Force.....	34

1. Subject Matter

1.1 Brief Description

This Procedure sets out the corporate rules and processes concerning the internal reporting by the employees of the Company and by any third parties falling within its scope regarding any compliance issue taking place in the context of their work. For the purpose of this procedure, compliance issue means any deviation from laws and regulations including any unethical misconduct and/or any violation of Enerwave's Code of Ethics any violation of Code of Conduct and, generally, of any of the Policies included in Enerwave Management Framework perpetrated by any Enerwave employee, manager, director or third party in business relationship with Enerwave.

1.2 Structure

The current Procedure lays down rules and provisions related to its purpose and principles, its scope, the roles and responsibilities of Compliance Officer, the reporting channels and stages of the Process, the protection of Reporting Persons and Persons Concerned, its data protection and transparency requirements and, finally, its general terms.

1.3 Linkage

The current Procedure is linked to the Ethics and Compliance System of the Enerwave Management Framework ("EMF"). The Procedure is also applicable within the framework of principles laid down by the Enerwave Code of Ethics and Code of Conduct.

1.4 Enforceability

The Company ensures that all its members of staff (either employees, or contractors as defined below) acknowledge and comply with the rules of the current Procedure.

2. Definitions

- 2.1. *“Code”* means any Code of the Company, as in force from time to time including Code of Ethics, Code of Conduct, EMF policies and the current legislation and external regulations as defined by the relevant Authorities.
- 2.2. *“Company”* means the company under the corporate name “Enerwave Single-Member Societe Anonyme” and the distinctive title “Enerwave S.A.”, incorporated and existing under the laws of Greece, which has its registered seat at Marousi, VAT: 999717970, FAE Athens Tax Office. The term also includes all subsidiaries in Greece and abroad.
- 2.3. *“Competent Authority”* means any public authority designated under applicable legislation to receive external Reports and to give Feedback and / or Follow-Up to Reporting Persons.
- 2.4. *“Compliance Officer”* means the company executive who receives Reports, gives Feedback to Reporting Persons and executes Follow-Up actions, including the drafting of Investigative Reports, as these are designated to him / her by virtue of this Procedure.
- 2.5. *“Employees”* means the persons bound by an indefinite/definite time employment agreement with the Company and any manager or director of the Company even if such person does not have an employment agreement with the Company.
- 2.6. *“Feedback”* means the provision to the Reporting Person of information on the action envisaged or taken by the Company as Follow-Up and on the grounds for such Follow-Up.
- 2.7. *“Findings”* means proof or indications about Misconduct.
- 2.8. *“Follow-Up”* means any action taken by the Company to assess the accuracy of the allegations made in the Report and, where relevant, to address the Misconduct reported, including through actions such as an internal enquiry, an investigation, the imposition of sanctions or the closure of the Procedure.
- 2.9. *“Group”* means the group of companies and subsidiaries of Enerwave.
- 2.10. *“Investigative Report”* means the report laying down the outcome of the investigation.

- 2.11. *“Involved Person”* means a natural or legal person who is referred to in the Report and is neither a Reporting Person nor a Person Concerned.
- 2.12. *“Misconduct”* means acts or omissions that (i) are unlawful under applicable legislation or defeat the object or the purpose of applicable legislation, and / or (ii) are in violation of the Code.
- 2.13. *“Personal Data”* means any information relating to an identified or identifiable natural person, also referred to as data subject; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 2.14. *“Person Concerned”* means a natural or legal person who is referred to in the Report or public disclosure as a person to whom the Misconduct is attributed or with whom that person is associated.
- 2.15. *“Report”* means the oral or written communication of information, including reasonable suspicions, about actual or potential Misconduct, in the reasonable belief of the Reporting Person which occurred or is occurring or is very likely to occur in the future in the organization of the Company or the Group and about attempts to conceal such misconduct.
- 2.16. *“Reporting Person”* means a natural person falling within the personal scope of this Procedure, who reports or publicly discloses information on Misconduct.
- 2.17. *“Retaliation”* means any direct or indirect act or omission which occurs in the work-related context of the Company or the Group, is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the Reporting Person.
- 2.18. *“Procedure”* means the corporate rules and provisions included in the current Procedure.
- 2.19. Apart from the foregoing definitions, the definitions of 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 of applicable Greek legislation shall also apply in the interpretation and implementation of this Procedure.

3. Purpose & Principles

3.1 Purpose

The purpose of this Procedure is

- (a) the establishment and implementation of a direct channel of communication between the Company and the persons falling within its scope, for the reporting of any compliance issue with the Codes taking place in the context of their work and
- (b) The handling of the reported alleged violations of Enerwave Codes

3.2 Objectives

The objectives of this Procedure are the following:

- Collection of evidence and the investigation of Misconduct / unethical behavior, in the context of work;
- Ensure the confidentiality of the identity of Reporting Persons
- Ensure the adequate protection against retaliation of Reporting Persons and of all Involved Person while the Follow-Up is in progress and after the end of it except as a consequence of imposition of sanctions according to the applicable Company's policies or legal actions.
- Execution of actions related to the reporting, feedback, follow-up, completion and any other process described in this Procedure;
- Effective addressing of the repercussions of Misconduct/unethical behavior, by taking appropriate remedial actions;
- Assessment and continuous improvement of corporate operations towards an overall safe, effective, efficient, transparent, reliable, ethical and socially responsible operation of the Company;
- Compliance of the Company and its executives and employees with applicable legislation and corporate codes, policies and procedures.
- Establishment, exercise or defense of legal claims of the Company or third parties;
- Development of a "speak – up culture" within the Company, which will encourage the reporting of misconduct without the fear of retaliation or any form of retaliation towards the Reporting Person.

3.3 Principles

In the implementation of this Procedure, the Company shall adhere to the following principles:

- Protection of the right of Reporting Persons to exercise their freedom of expression;
- Confidentiality of the identity of Reporting Persons, Persons Concerned and of the Involved Person while Follow-Up is in progress
- Completeness, integrity and confidentiality of the information collected in the course of the Process;
- Transparency of the Process;
- The adequate protection of Reporting Persons against retaliation;
- Principle of the protection of personal data;
- Principles of the Enerwave Management Framework (“EMF”).

4. Scope

4.1 Personal Scope

The provisions of this Procedure are applicable to employees, agents, trainees, contractors, subcontractors, suppliers and persons in cooperation to the administrative, management or supervisory body of the Company. Reporting persons can be persons who are in a business relationship with the Company, or persons who were in a work-based relationship with the Company and which has since ended, or whose work/business-based relationship is yet to begin (in cases where information on Misconduct has been acquired during the recruitment process or other pre-contractual negotiations), and that became aware of certain information which are relevant for reporting under the present procedure.

4.2 Material Scope

The provisions of this Procedure are applicable to Reports on (i) unlawful Misconduct and / or (ii) Misconduct in violation of the Codes, which takes place in the context of work with the Company. The public disclosure of misconduct by making relevant information available in the public domain shall not preclude the submission and / or investigation of Reports.

4.3 Indicative Areas of Reporting

Reports may indicatively refer to misconduct related to the following areas: (i) corruption and fraud (ii) conduct at work, including but not limited to harassment and discrimination; (iii) procurement; (iv) competition and antitrust; (v) corruption, bribery, money laundering and terrorist financing; (vi) protection of the environment; (vii) public health; (viii) product and / or service safety and compliance; (ix) consumer protection; (x) protection of fundamental rights; (xi) protection of privacy and personal data; and (xii) security of network and information systems.

5. Roles, Responsibilities and Competencies

5.1 Organizational Structure

The organization of the Company for the implementation of the current Procedure is structured on the basis of responsibilities and competences allocated to the following corporate bodies:

5.1.1. The Compliance Committee; The Compliance Committee is responsible to monitor and assess the implementation of this procedure.

5.1.2 The Chief Executive Officer; The Chief Executive Officer of the Company is responsible for the supervision of the implementation of - and adherence of the Company and its staff to - the Procedure

5.1.3. The Division Directors; The Division Directors are responsible to assess alleged violations if these are reported to them and inform the Compliance Officer if the reported violations are assessed as serious and /relevant for reporting under the Codes].

5.1.4 The HR Director; The HR Director is responsible for managing the relationship with, and implementing the actions vis-à-vis the offender in accordance with the Code of Conduct

5.1.5. The Compliance Officer; The Compliance Officer is responsible for investigating the alleged violation and identifying gaps in the codes or procedures that allowed the escalation of any non-compliance.

The Compliance Officer is responsible for the implementation of the Procedure in respect of all Reports submitted to the Company. In the event of a Report of non-compliance concerning the Finance and Control Division, the Compliance Officer shall forward the Report without delay to the Compliance Committee that will appoint an investigator. In the event that the Committee is more than five days late in appointing an investigator, the Compliance Officer shall forward the Report to Internal Audit Department.

The Corporate bodies may request support during the investigation phase and all Departments of the Company are responsible to support the process in every stage and implement the remedial actions determined in the course of Process. Indicatively but not limited to can be mentioned the following (a) The Risk & Internal Control Department is responsible for the assessment of risks linked to Reports, reported Misconduct and Findings (b) The Legal Department is responsible to provide advice regarding legal issues arising from the implementation of the Procedure and from reported Misconduct (c)The Data Protection Officer

is responsible to provide advice regarding data protection issues arising from the implementation of the Procedure e.t.c.

5.2 Competencies

For the implementation of the current Procedure, each corporate body is hereby designated with the following competencies:

- The **Compliance Committee** has the following competencies:
 - To examine and approve Investigative Reports and to decide on whether a violation has occurred;
 - To interpret the rules and provisions of this Procedure in line with the law and the Code;
 - To examine and resolve requests of Reporting Persons for an effective remedy against acts or omissions, which may constitute Retaliation;
 - To examine and resolve objections of Persons Concerned in respect of Investigative Reports;
 - To evaluate corporate measures having detrimental effect to Reporting Persons.
 - To review modifications / revisions of the current Procedure.
 - To receive and approve the Annual Violations Report and any modifications/revisions to it.

- The **CEO** has the following competencies:
 - Supervises the application of the procedure and ensures that the investigation of any alleged violation was exhaustive and in-depth supporting the Compliance Officer or the HR Director to access any point or information of the company.
 - Ensures the completeness of Annual Violation Report and submits it to the Compliance Committee for discussion and approval.
 - Seek and implement appropriate measures to effectively deter personnel in the same organization or in other organizations with which the Reporting Person is in contact in the context of his or her work-related activities from taking, encouraging or tolerating, directly or indirectly, acts or omissions which may constitute any form of retaliation.

- The **Division Directors** have the following competencies:
 - To assess the reported alleged violation to them and inform the compliance officer if alleged violations are assessed as serious.

- The **Compliance Officer** has the following competencies:
 - To receive and follow-up on Reports;
 - To draft and communicate Feedback to Reporting Persons;
 - To draft, receive and impart communications to Persons Concerned and Involved Persons;
 - To draft and issue Investigative Reports; In the case of a Report of non-compliance, in which case a different investigator is appointed, the Investigative Reports are issued by the researcher who has been appointed.
 - To document the implementation of the Procedure;
 - To consult with the Legal Department whenever consultation on legal issues is needed;
 - To consult with the competent department whenever consultation on special issues is needed;
 - To draft and submit the Annual Violations Report to the Chief Executive Officer;
 - To maintain the corporate Register of Violations Reports and Investigations;
 - To identify possible gaps in Enerwave procedures and propose modifications/revisions
 - To propose modifications / revisions to the current Procedure.

6. Reporting alleged violations & Feedback Channels

6.1 Reporting Channels

Any party who suspects a potential violation of any of Enerwave compliance-related policies or internal processes, should discuss/communicate the concern through one of the following channels:

- their direct manager or, in case the suspected violation involves the direct manager, the direct manager's superior
- The direct manager of the concerned person
- The Head of HR
- The Compliance Officer
- The electronic software whistleblowing hotline application

To the extent possible and consistent with Enerwave's legal obligations and effective investigations, Enerwave will keep confidential all reports regarding suspected violations and the identities of the person(s) reporting and the person(s) implicated by the report. However, Enerwave may be required to disclose certain criminal or illegal actions to regulatory authorities and/or judiciary or other competent authorities according to applicable legal requirements.

Enerwave prohibits and protects against any retaliation for reporting any suspected misconduct in good faith.

If any party becomes aware of retaliation (against himself/herself or another), he/she should report it right away to the Compliance Officer, or any of the other reporting channels. Enerwave will investigate the matter and take appropriate and immediate action to remediate this.

The Company accepts the submission of Reports through the following channels of communication. The sender can choose the channel that he /she thinks best suits to him/her:

6.1.1 By post (safeguards anonymity);

6.1.2 By email (Anonymity is not guaranteed)

6.1.3. By physically written reports (Anonymity is not guaranteed)

6.1.4. Secure electronic software whistleblowing application (Anonymity is guaranteed). Anonymity is guaranteed through removal of metadata (e.g. location, IP address - no metadata are stored/saved in any case).

6.1.5. In person (Anonymity is not guaranteed)

Reporting channels of communication are designed to be user-friendly, secure, ensure confidentiality for receiving and handling information provided by Reporting Persons.

Any Reports, which are not submitted through the foregoing dedicated channels of communication, will not be taken into account by the Company.

6.2 Choice of Reporting Channel

Reporting Persons may opt for the reporting channel of their choice at their discretion. Upon request by the Reporting Person through the reporting channels, reporting may also take place by means of physical meetings with the designated Compliance Officer, within a reasonable timeframe.

6.3 Form / Content of Reporting

The reporting channels enable persons to report in writing, including reporting by electronic means, or orally or both. For the purpose of ensuring the completeness and cohesiveness of reporting, the Company requests the submission of Report in specific form and contains minimum content (a description of the Misconduct, the date of disclosure, the preferred contact details of the Reporting Person, any supporting document).

6.4 Durability

Reporting channels enable the durable storage of information to allow for proof of receipt and the further investigation of Reports.

6.5 Security of Channels

Reporting channels are designed, established and operated in a secure manner that ensures that the confidentiality of the identity of the Reporting Person and any third party mentioned in the Report is protected, and prevents access thereto to company employees, other than the Compliance Officer.

6.6 Feedback Channels

The Company communicates its Feedback to the Reporting Person, in principle via the channel indicated as preferred by the Reporting Person or, if not declared, by the same channel used for the submission of the Report.

6.7 Third Party Operators

Reporting channels may be provided and / or operated externally by entrusted private third parties offering appropriate safeguards and requirements.

7. Reporting & Feedback

7.1 Reporting & Feedback Actions

Reporting and Feedback is executed according to the following course of actions:

- Submission of the Report through any of the Reporting Channels;
- Acknowledgment of receipt of the Report to the Reporting Person within five (5) days of that receipt
- Request and provision of further information from Reporting Persons in the course of the Process, if necessary, albeit without the latter having the obligation to provide such information;
- Preliminary Feedback;
- Closure or Completion of Investigation and Final Feedback.

7.2 Veracity

In light of the circumstances and the information available to them at the time of reporting, Reporting Persons are required to report only information on Misconduct, which they have reasonable grounds to believe is true. In this respect, Reporting Persons are required to refrain from malicious and frivolous or abusive or deliberately and knowingly wrong or misleading Reports.

7.3 Preliminary Feedback

Reporting Persons shall be diligently informed by the Compliance Officer within a reasonable timeframe about any information requested on the process. For all the rest such as actions envisaged or taken as Follow-Up to the Report and the grounds for the choice of that Follow-Up that will be done etc, information will be provided at high level.

7.4 Final Feedback

The Compliance Officer shall provide information to the Reporting Person on the outcome of the investigation and the Investigative Report, if issued, without undue delay and in any event within three (3) months from the acknowledgement of receipt of the Report.

7.5 Extension of Feedback Deadline

The period for the Final Feedback may be extended up to two (2) more months where necessary, taking into account the complexity of the Report and number of other pending

Reports. The Company shall inform the Reporting Person of any such extension at the expiration of the initial three (3) month period, together with the reasons for the delay.

7.6 External Reporting

The Final Feedback will include clear and easily accessible information regarding the procedures for reporting externally to Competent Authorities and, where relevant, to institutions, bodies, offices or agencies of the European Union. Each Reporting Person has the right to report to an external channel if it feels that the internal report did not lead to a satisfying solution.

8. Handling of Alleged Violations

8.1 Process description

The process for handling alleged violations of the Code of Conduct, Code of Ethics or any of Enerwave's compliance-related policies or internal processes is as follows:

If an alleged violation is reported to the direct Manager of the reported person or to the direct Manager of the Person Concerned or to the Head of HR, then all necessary enquiries are made by the Division Director of the Person Concerned, or the CEO in case that the Person Concerned is a Division Director, in cooperation with the Head of HR in order to assess the severity of the allegation by summoning all interested parties for their testimonies on the allegations put forward. If the alleged violation is confirmed as minor and can be resolved by the Division Director or the Head of HR without opening an official enquiry, then the case is closed. If the alleged violation is assessed as serious then the Compliance Officer is informed.

If the alleged violation is reported to the Whistleblowing Hotline or directly to the Compliance Officer or is assessed as serious by the Directors then the Compliance Officer opens an enquiry on the received report and initiates an investigation.

In case that the Person Concerned is the Chairman or CEO, then the possible reporting channels are the Whistleblowing hotline or the Compliance Officer, and the process shall be performed by the Compliance Committee.

8.2 Compliance Officer Actions

Following the submission of each Report, the Compliance Officer shall be responsible to execute or supervise the execution of the following actions:

- Assessment by the Risk & Internal Control Department of the risks arising from the reported Misconduct;
- Determination by the Risk & Internal Control Department of the priority status of the Report based on the assessment of its risks and the level of inflow of Reports;
- Collection by the Compliance Officer of evidence by summoning all interested parties for their testimonies on the allegations put forward through their Directors. All evidence is sought, collected and recorded and any department may be called upon to contribute to the specific investigation.

- The Compliance Officer calls the Concerned Person who is alleged to have committed a violation, through the Division Director of the concerned person, or through the CEO in case that the Concerned Person is a Division Director, to provide written and verbal testimony.
- Assessment by the Compliance Officer of the validity and accuracy of allegations made in the Report;
- Determination by the Compliance Officer of Findings, if any, and compilation of Remedial Actions;
- After having duly assessed the matter, the Compliance Officer may decide that a reported Misconduct is classified as minor, does not require further Follow-Up or the issuance of an Investigative Report, and will order the closure of the Process. In its Final Feedback to such cases, the Compliance Officer shall notify the Reporting Person on the grounds, which led to this decision.
- Drafting by the Compliance Officer and issuance of the Investigative Report;
- Submission by the Compliance Officer of the Investigative Report to the Compliance Committee for review and approval;
- Filing by the Compliance Officer of the Report and all Feedback and Follow-Up actions up to the completion of the Process;
- Communication by the Compliance Officer of Remedial Actions to competent persons / Departments of the Company, monitoring of the status of Remedial Actions and confirmation of their execution;
- The Compliance Committee shall be informed on a regular basis on all the Reports, even if no investigation was required.

8.3 Compliance Committee Actions

Following the submission of Investigative Report,:

- The Compliance Committee reviews the evidence and sets a meeting date to discuss the case.
- The Compliance Committee invites all interested parties, as well as any additional persons if needed, to testify and give evidence.
- After hearing/ reading the evidence, the Compliance Committee convenes to evaluate whether a violation has been committed.

8.4 Investigative Report

Template of an Investigative Report includes at least the following elements:

1. Date of Report;
2. Alleged misconduct/violation and date it occurred;
3. Date that the investigation commenced;
4. Description of Findings on the reported Misconduct;
5. Evidence supporting the Findings;
6. Factors that appear to contribute to the reported Misconduct;
7. Root causes of the reported Misconduct;
8. Risk assessment of Findings;
9. Remedial Actions resulting from the investigation (specific, focused and executable).

8.5 Risk Assessment

Risk assessment of Reports and Findings shall take place by the Risk & Internal Control Department on the basis of the possibility and severity of risks and concerns raised in relation to the rights and interests of the parties involved, to Company's interests and / or to the public interest.

8.6 Repetitive or Ancillary Reports

The Compliance Officer may decide to close the Process regarding repetitive Reports, which do not contain any meaningful new information on Misconduct compared to a previous Report in respect of which the relevant procedures were concluded, unless new legal or factual circumstances justify a different Follow-Up. In its Final Feedback to such cases, the Compliance Officer shall notify the Reporting Person on the grounds, which led to this decision.

8.7 Priority

The Compliance Officer may deal with the Reports of serious Misconduct in terms of risk as a matter of priority. In the event of high inflows of Reports, the Compliance Officer will supervise the conduct of a risk-based assessment and prioritize all Reports accordingly. Prioritization will be without prejudice to the three (3) month timeframe of the Final Feedback, yet it may constitute valid grounds for its extension.

9. Completion

9.1 Completion Actions

Based on the outcome of the investigation, the Compliance Officer may proceed to one or more of the following completion actions:

- Close the process in respect of Reports of minor importance or repetitive or ancillary Reports;
- Close the process due to lack of sufficient evidence or other grounds explicitly justified;
- Close the process based on the confirmation of the non-existence of a breach;
- Issue an Investigative Report;
- Take Remedial Actions to address the issues raised in the Report;
- Refer the Reporting Person to other channels or procedures in the case of Reports exclusively affecting individual rights of the Reporting Person;
- Refer the Reporting Person to a competent authority for further investigation, insofar as such information would not prejudice the internal enquiry or the investigation or affect the rights of the person concerned.

9.2 Remedial Actions

In the determination of Remedial Actions, the Compliance Officer shall take into account the nature and root causes of Findings and the effectiveness of Remedial Actions to address relevant risks and concerns. The Compliance Officer allocates the responsibility for Remedial Actions to the Departments closest to the source of the problem highlighted by each Finding, most able to deal with it and with powers to remedy it, where possible.

9.3 Reporting of Criminal Offences

In case that the reported Misconduct may constitute a criminal offence, the Company shall complete the Process and file an indictment to Competent law enforcement Authorities for the initiation of criminal proceedings accompanied with relevant documentation collected or produced during the Process.

9.4 Record-Keeping

The Compliance Officer retains a Register of Code Violations Reports and Investigations in electronic form (“Register”). The Register contains the following data: (i) Reporting Persons data, if available; (ii) date of the submission of the Report and closing date or Investigative

Report delivery date; (iii) subject-matter of the Report; (iv) data of Persons Concerned, if available; (v) Involved Persons data, if available; (vi) channels and dates of Feedback and communications with all parties involved to the Procedure; (vii) risks and outcomes of their assessment; (viii) Follow-Up actions; (ix) Findings; (x) remedial actions; (xi) closing date or Investigative Report delivery date; and (xiii) supporting documentation. The nature and structure of the Register ensures the retrievability and the protection of privacy by design / default of the documents, information and data included therein.

10. Protection of Reporting Persons

10.1 Right to Report

The right of Reporting Persons to submit Reports shall be respected and protected as part of their fundamental right to freedom of expression, in particular their rights to hold opinions and to impart information without interference of an arbitrary nature.

10.2 Confidentiality

The identity and any other information with the capacity to identify the Reporting Person is not disclosed to anyone beyond the Compliance Officer(s).

By way of derogation to the above, the Company may disclose the identity of the Reporting Person to public authorities or in the course of judicial proceedings through the filing of indictments or the process of establishing, exercising or defending its legal claims or in the context of its legal obligations. Reporting Persons shall be informed before their identity is disclosed along with an explanation in writing of the reasons for such disclosure. The foregoing protection of confidentiality should not apply where the Reporting Person has intentionally revealed his or her identity in the context of a public disclosure.

10.3 Measures against Hindering of Reporting

The Company will impose effective, proportionate and dissuasive measures of disciplinary nature against members of staff that have been found to hinder or attempt to hinder reporting.

10.4 Non-Retaliation

Retaliation against Reporting Persons by the Company or any member of its staff is strictly prohibited. It is clarified, however, that in the case of reporting of any Misconduct in which the Reporting Person participates, although reporting is taken into account as a mitigating factor in the decision of a possible disciplinary penalty, the disciplinary penalty applied to the Reporting Person is not considered retaliation. Indicative forms of prohibited Retaliation may include the following: (a) suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment; (j) failure to renew, or

early termination of, a temporary employment contract; (k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; and (l) early termination or cancellation of a contract for goods or services.

10.5 Deterrence

In order to ensure non-retaliation against Reporting Persons, the Company shall seek and implement appropriate measures to effectively deter colleagues and managers in the same organization or in other organizations with which the Reporting Person is in contact in the context of his or her work-related activities from taking, encouraging or tolerating, directly or indirectly, acts or omissions which may constitute any form of retaliation. Effective, proportionate and dissuasive disciplinary measures against those who take retaliatory or other adverse actions against Reporting Persons will also be examined.

10.6 Accountability

In case of a need to apply a measure having detrimental effect to a Reporting Person within three (3) years from submission of the Report, the Compliance Committee, upon request of the Reporting Person to the Compliance Officer, shall evaluate whether such measure is based on duly justified grounds, in any case not related to any retaliation whatsoever, and shall document its evaluation in writing.

10.7 Right to Seek Effective Remedy

Reporting Persons have the right to submit requests before the Compliance Committee for an effective remedy against acts or omissions, which may constitute Retaliation. Following the examination of the relevant request and to the extent necessary, the Compliance Committee may order the Management of the Company to take measures for the effective prevention and deterrence of such acts or omissions and for the relief from any detriment thereof.

10.8 Access to Justice

Nothing herein shall prejudice the right of Reporting Persons to seek access to justice in relation to the subject matter of Reports.

10.9 Extension of Protection

The measures for the protection of Reporting Persons set out in this article shall also apply, where relevant, to: (a) facilitators; (b) third persons who are connected with the Reporting Persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the Reporting Persons; and (c) legal entities that the Reporting Persons own, work for or are otherwise connected with in a work-related context with the Company or the Group.

11. Rights of Persons Concerned

11.1 Protection of Fundamental Rights

The Company shall take proportionate measures to protect the rights of Persons Concerned from reputational damage or from negative consequences, which fall outside the scope of sanctions imposed by virtue of the law or of disciplinary measures provided for by corporate rules.

11.2 Confidentiality

The Company shall take proportionate measures to protect the confidentiality of the identity of Persons Concerned.

11.3 Right of Access

Notwithstanding the conditions set out in this Procedure, the Person Concerned has the right to access the part of the file of the Report concerning him or her, provided that the rights of Reporting and Involved Persons are adequately respected.

11.4 Proof of Misconduct

The Person Concerned shall be presumed not to be related to a reported Misconduct, unless sufficient evidence is provided thereto.

11.5 Right to be Heard

Prior to the issuance of the Investigative Report, the Person Concerned is entitled to be heard, either orally or in writing, before the Compliance Officer handling the Report.

11.6 Right to Seek Effective Remedy

Prior to the issuance of the Investigative Report, the Person Concerned is entitled to raise his / her objections, either orally or in writing, before the Compliance Committee. Following the examination of objections, the Compliance Committee shall either approve or amend or annul the relevant Investigative Report.

12. Data Protection

12.1 Reporting

Reporting Persons have the right to submit Reports at their discretion either anonymously / pseudonymously or by their name. In the process of submission, not any personal data (e.g. the IP address or machine ID of the device used) will be collected by the Company.

12.2 Protection of Personal Data

The identity and personal data of every Reporting Person, Person Concerned, Involved Persons and, generally, third persons referred to in the Report, such as witnesses or colleagues, are protected at all stages of the Process.

12.3 Transparency of Processing

The Company takes appropriate measures to timely provide by electronic means to data subjects any information relating to the processing to the data subject in a concise, transparent, and easily accessible form, using clear and plain language.

12.4 Data Collected during Telephone Calls

Where a recorded telephone line or another recorded voice messaging system is used for reporting, the Company may record the relevant call in a durable and retrievable form, only subject to the consent of the Reporting Person. In case that the Reporting Person does not consent, the Compliance Officer shall write accurate minutes of the relevant conversation and offer the Reporting Person the opportunity to check, rectify and agree by signing them.

12.5 Data Collected during Physical Meetings.

Where the Reporting Person requests a physical meeting with the designated Compliance Officer, the latter shall write accurate minutes of the relevant conversation in a durable and retrievable form, only subject to the consent of the Reporting Person. The Compliance Officer shall offer the Reporting Person the opportunity to check, rectify and agree by signing them.

12.6 Irrelevant or Accidentally Collected Data

Personal data which are manifestly not relevant for the handling of a specific Report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

12.7 Privacy by Design and by Default

The Company implements appropriate technical and organizational measures for ensuring that data protection principles are incorporated by design throughout the Process and that, by default, only personal data which are necessary for each specific purpose of the processing are processed, including the following:

- Abstention from any processing of personal data for purposes other than those explicitly specified in this Procedure;
- Access to personal data related to the Process on a need-to-know basis;
- Pseudonymisation of the identity of Reporting Persons, Persons Concerned and Involved Persons by the Compliance Officer in any communications to other members of staff, unless deemed otherwise necessary for the purposes of processing;
- Appropriate organizational and technical measures of data minimization and storage limitation throughout the life cycle of personal data;
- Implementation of corporate process for addressing data subject rights;
- Execution and updating of Data Protection Impact Assessments;
- Monitoring of the Process by the Data Protection Officer.

12.8 Confidentiality and Security of Data

The Company implements appropriate technical and organizational measures to ensure a level of security for personal data related to the Process, which is appropriate to the risk vis-à-vis data subjects' rights, including the following:

- The Compliance Officer complies with strict conditions of confidentiality at all the stages of the Process;
- The corporate Register of Code Violations Reports and Investigations is separately stored and retained only in electronic encrypted form;
- Appropriate corporate policies and technical measures are in place to ensure, monitor and assess the ongoing confidentiality, integrity, availability and resilience of processing systems involved.

12.9 Recipients of Data

The Company may assign the operation of reporting channels, the receipt and processing of Reports and, generally, the processing on the behalf of the Company of any data related to the Process to third parties, which offer appropriate guarantees of respect for independence,

confidentiality, data protection and secrecy (e.g. external reporting platform providers, external counsels, auditors). The Company may share data related to the Process with its parent and subsidiaries within the Group for organizational purposes at Group level. Data received through Reports may be shared with law enforcement authorities as evidence in enforcement actions where appropriate.

12.10 Data retention periods

Reports and any information and data generated in the course of Processes shall be stored for a period of five (5) years from the closure of the process, unless further retention is necessary and proportionate for the purposes of processing.

12.11 Data Subjects' Rights

The exercise of data subjects' rights shall be restricted to the extent, and as long as, necessary to prevent and address attempts to hinder reporting or to impede, frustrate or slow down Follow-Up, in particular investigations, or attempts to find out the identity of Reporting Persons.

13. Transparency

13.1 Whistleblowing Notice

The Company makes available both on its intranet for members of staff and on its corporate website in a separate, easily identifiable and accessible section at least the following information about the Process:

- ✓ the protective regime for Reporting Persons;
- ✓ the contact details for the reporting channels;
- ✓ the procedures applicable to the reporting of Misconduct;
- ✓ the confidentiality regime applicable to Reports;
- ✓ information in relation to the processing of personal data;
- ✓ the nature of the follow-up to be given to Reports;
- ✓ the remedies and procedures for protection against retaliation; and
- ✓ the availability of confidential advice for persons contemplating reporting;

13.2 Right to be Informed

Upon request, any member of staff and any person falling within the personal scope of this Procedure shall receive information by electronic means about the subject matter and implementation of this Procedure in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

14. General Terms

14.1 Training

The Company should have in place a corporate training program for its members of staff on the implementation of the Procedure, including its following aspects: (i) what the protected internal reporting mechanism offers; (ii) what is Misconduct and how to identify it; (iii) the existence of internal and external reporting channels; (iv) how to file a Report; (v) how Reports are dealt with; (vi) which conduct is considered to be retaliatory and what are the remedies; (vii) which are the rights of Reporting Persons and Persons Concerned.

14.2 Interpretation

Whenever issues of interpretation arise in relation to the implementation of the current Procedure, the responsible body to provide interpretation is the Compliance Committee with the assistance of the Legal Department.

14.3 Modifications

Any modifications to the present Procedure by the Company shall come into force upon notification to the employees of the Company and any third persons falling within its personal scope. Modifications shall not apply to any pending Procedurees at the time of the modification.

14.4 Subsidiarity

Nothing in this Procedure shall prejudice the rights and obligations of the Company and / or any members of its staff arising from applicable laws and regulations.

14.5 External Reporting

Nothing in this Procedure shall prejudice the rights of Reporting Persons to communicate information about Misconduct to competent authorities under the law.

14.6 Relationship with Labor Law

This Procedure shall not affect statutory rules on the exercise by employees of their rights, in particular their right to consult their representatives or trade unions, and on protection against

any unjustified detrimental measure prompted by such consultations as well as on the autonomy of the social partners and their right to enter into collective agreements.

14.7 Non-Waiver

Rights and remedies provided for under this Procedure cannot be waived or limited by any agreement, policy, form or condition of employment.

14.8 Entry into Force

The current Procedure shall enter into force upon notification to the employees of the Company and any third persons falling within its personal scope.