

REPORTING PROCEDURE

Version	Date	Notes
1	April 16, 2026	My Whistleblowing 2.0 Version

TABLE OF CONTENTS

INTRODUCTION	3
REPORTING PROCEDURE	3
1. WRITTEN REPORTING	3
2. VOCAL REPORTING	9
ADDITIONAL INFORMATION	11

INTRODUCTION

This document outlines the operational procedures for reporting unlawful acts or irregularities that may occur within the company.

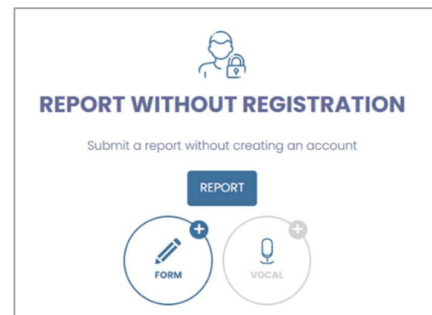
Reports may concern violations of national or European Union laws that harm the public interest or the integrity of the organization. These include, by way of example, administrative, accounting, civil or criminal offences, as well as misconduct related to competition, falsification of information to obtain undue State aid, corporate tax evasion, information security, personal data protection, consumer protection, public health, environmental protection, and product safety.

The procedure, known as “Whistleblowing,” is accessible to all individuals who have or have had dealings with the company, including employees, collaborators, self-employed workers, interns, consultants, volunteers, job applicants, customers, suppliers, and any other person who has come into contact with the company. Its purpose is to enable the identification and timely management of any non-compliant conduct.

REPORTING PROCEDURE

1. WRITTEN REPORTING

From the company’s website homepage, scroll down to the bottom right and select “Whistleblowing Reports.” This will open a dedicated landing page, from which you can access the “My Governance” platform, where users are required to complete the relevant fields.



By clicking on "REPORT" and "FORM", the following page will open:

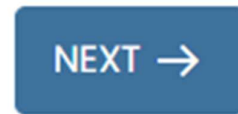
MY GOVERNANCE Help Center

Reporter data → Report to other subjects → Report details → Description of the event → Type of violation → Doc

All required fields are marked with a red asterisk and will generate a blocking warning if not filled out correctly. Otherwise, filling in the field is optional.

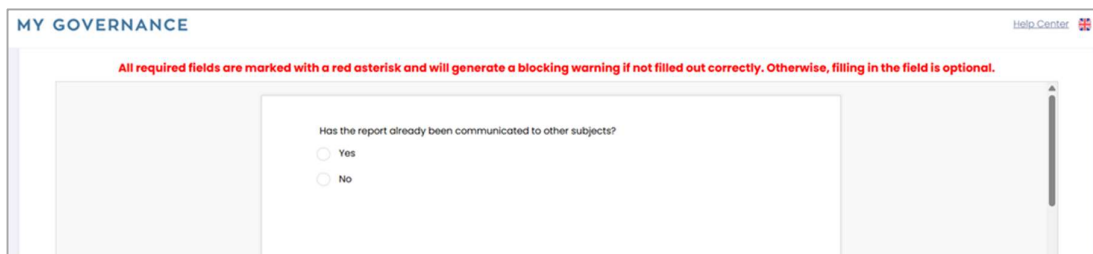
Name
Surname
Physical code
Phone
Company name
Role
 Employee

In the first section, labeled “Reporter’s details” and located at the top left, users may enter their identification information. Mandatory fields are marked with an asterisk; where no asterisk is present, completion is optional. As shown in the image, no mandatory fields are indicated, so users may proceed directly to the next step by clicking “NEXT” in the bottom right corner. At any time, users can return to the previous page by clicking the “PREVIOUS” button.



Depending on the user’s choice, the report may be submitted anonymously (if no personal data is provided) or as an identified report; in the latter case, the information entered will be visible to the report handler.

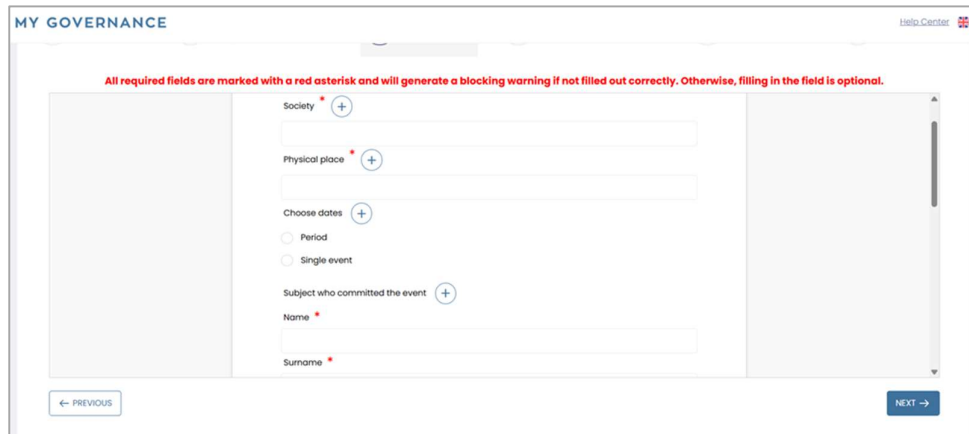
The second section, titled “Reporting to other parties” and located at the top left, allows users to indicate whether they have previously submitted reports concerning unlawful acts or irregularities, including in previous work contexts, through other entities, organizations, or individuals (such as consultants, lawyers, or managers). As no fields are marked with an asterisk, completion is optional, and users may proceed to the next step by clicking “NEXT.”



The third page, titled “Report,” requires the completion of several fields related to the case being reported.

As shown in the image, some fields are mandatory and are marked with an asterisk. In particular, the user must indicate the company(ies) to which the report refers (by selecting the “+” symbol), the physical location where the event occurred, if applicable, and the first and last name(s) of the individual(s) involved, i.e. employees or colleagues (including former employees), who are believed to have committed the alleged misconduct; multiple individuals may be indicated.

These fields must be completed in order to proceed with the process. All other fields not marked with an asterisk are optional, in line with the instructions provided in the previous sections.



MY GOVERNANCE Help Center

All required fields are marked with a red asterisk and will generate a blocking warning if not filled out correctly. Otherwise, filling in the field is optional.

Society *

Physical place *

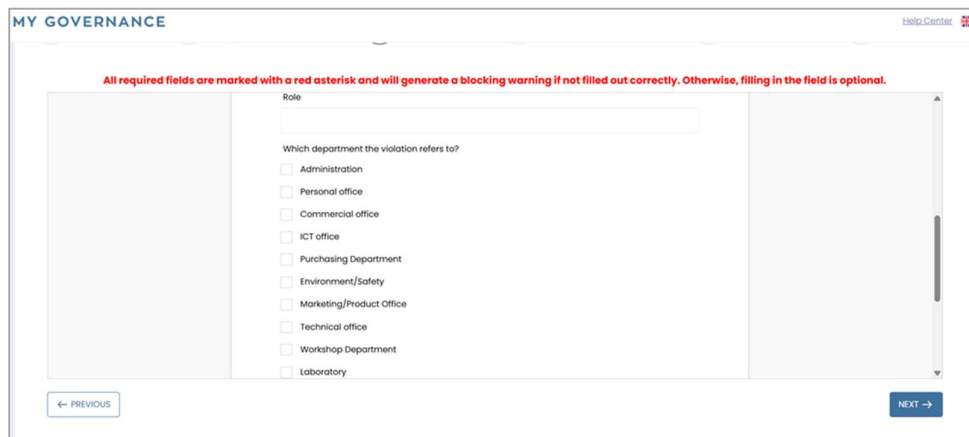
Choose dates

Period
 Single event

Subject who committed the event

Name *

Surname *



MY GOVERNANCE Help Center

All required fields are marked with a red asterisk and will generate a blocking warning if not filled out correctly. Otherwise, filling in the field is optional.

Role

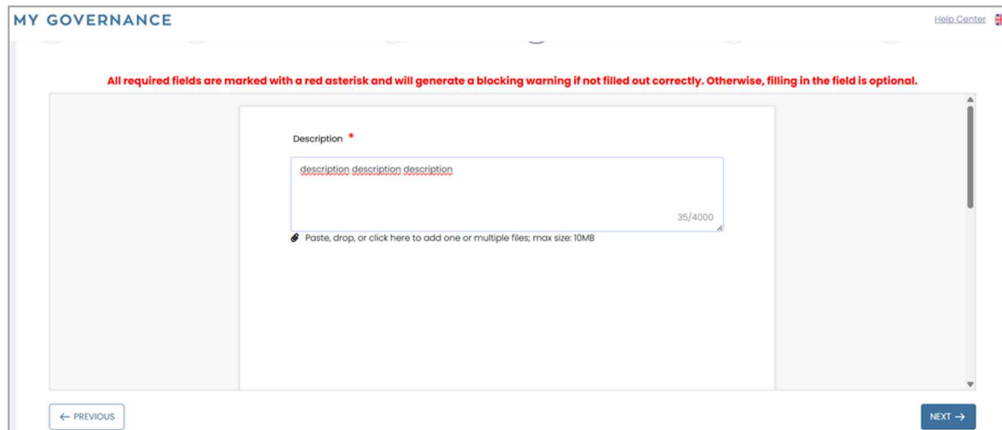
Which department the violation refers to?

- Administration
- Personal office
- Commercial office
- ICT office
- Purchasing Department
- Environment/Safety
- Marketing/Product Office
- Technical office
- Workshop Department
- Laboratory

Once the previous page has been completed, users can proceed to the next section, titled “Description of the facts.”

This field is mandatory: users must therefore provide a clear and detailed description of the alleged unlawful act or irregularity being reported, referring to the actions or conduct of the individuals previously identified in the earlier sections.

It is also possible to attach one or more files, within the 10 MB size limit, to support the information provided. Examples include screenshots of email or chat conversations, documents, reports, or recordings that may help substantiate the report.



MY GOVERNANCE Help Center

All required fields are marked with a red asterisk and will generate a blocking warning if not filled out correctly. Otherwise, filling in the field is optional.

Description *

description description description

35/4000

Paste, drop, or click here to add one or multiple files; max size: 10MB

← PREVIOUS NEXT →

Only then can you move on to the next section using the usual entry.



MY GOVERNANCE Help Center

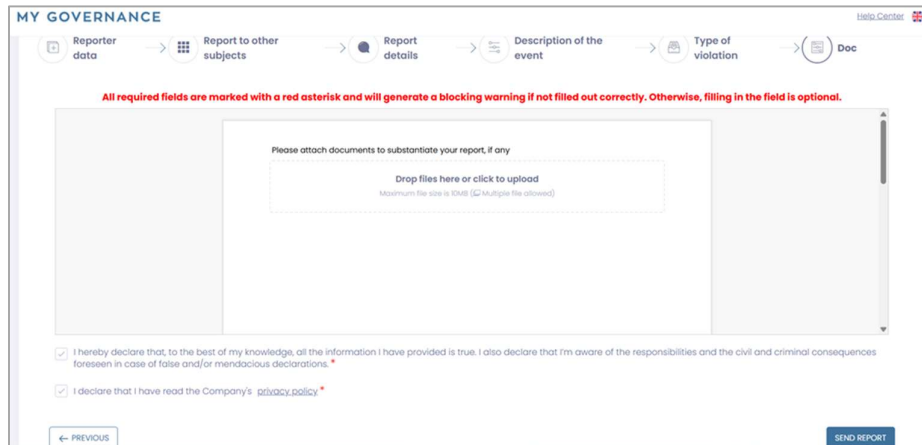
Reporter data → Report to other subjects → Report details → Description of the event → **Type of violation** → Doc

- Organizational Model pursuant to Leg. Decree 231/2001
- Law and/or regulations
- Business Procedures
- Business Regulations
- Other
- New type of violation
- New type of violation
- New type of violation
- New type of violation

← PREVIOUS NEXT →

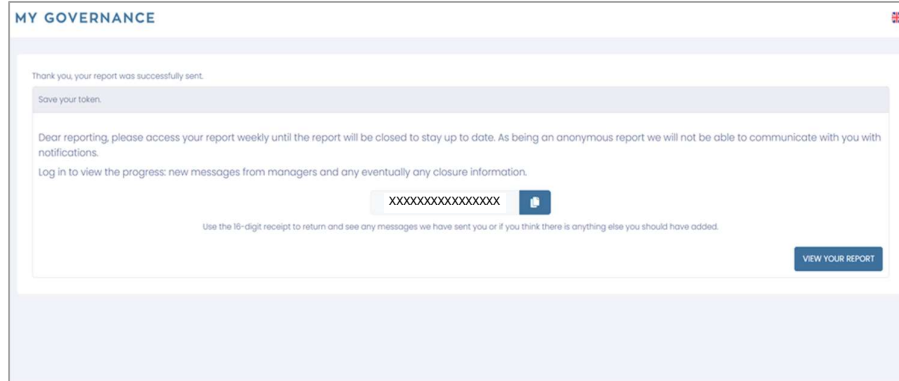
The section titled “Type of violation”, as shown in the illustrative image, allows users to classify the nature of the alleged unlawful act or irregularity committed by the individuals involved, by selecting one of the available options or choosing “Other.” Completion of this section is optional, as no mandatory fields are marked with an asterisk.

The final section, titled “Doc”, is also optional and allows users to upload additional documents or files to further support and complete the report, if deemed necessary.



By scrolling down on the same page, users are required to select both checkboxes. The first confirms awareness of the obligation to provide truthful information, in order to avoid false statements that may be subject to legal consequences; the second confirms that the user has read and acknowledged the Privacy Policy, accessible via the dedicated link.

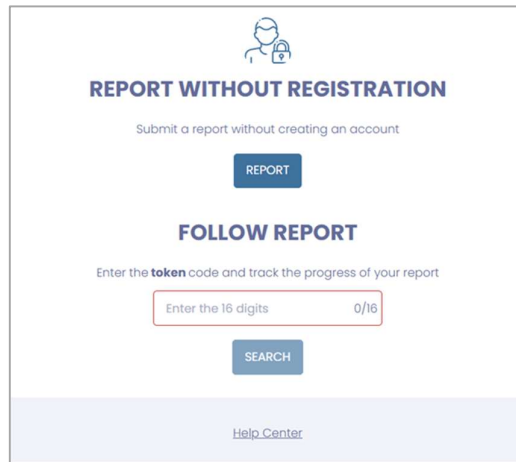
Once this mandatory step is completed, the report can be submitted by clicking the “SUBMIT REPORT” button at the bottom right.



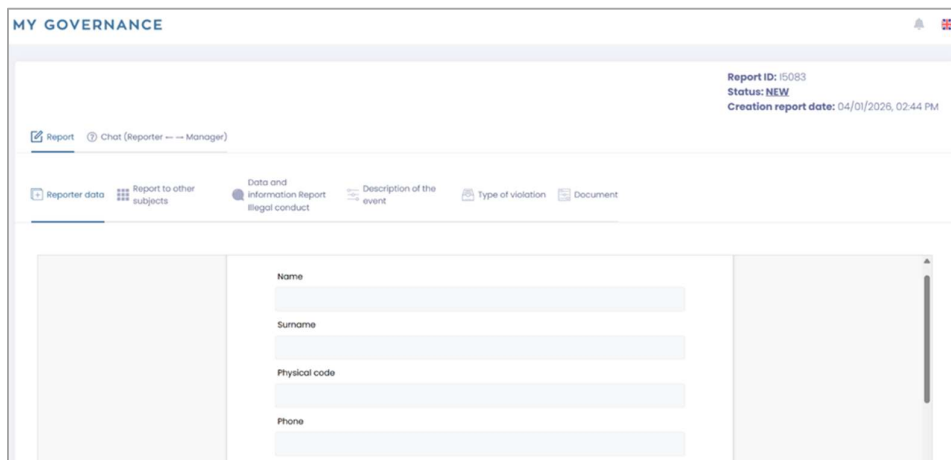
This screen confirms the completion and submission of the report to the platform. At the end of the process, a token is generated, i.e. a unique and personal numeric code, which is essential to access the system again, monitor the status of the report, add any updates, and check for responses from the company.

It is essential to save and retain the token for all future access to the platform and not to share it with anyone, as it is strictly personal.

By clicking on “VIEW YOUR REPORT” at the bottom right, users can access a summary of the report and review, for each section, the information provided and its status.

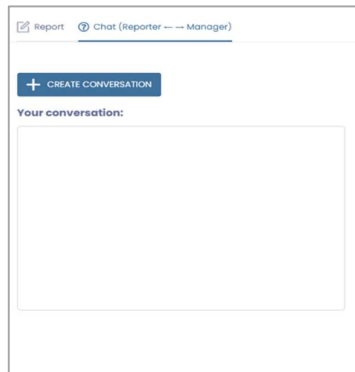


The screen that appears is as follows:

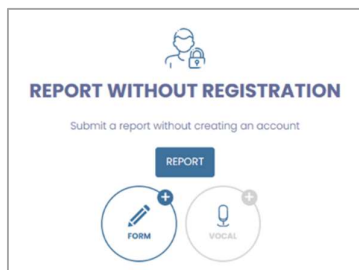


At the top left, in the “Chat (Reporter ↔ Handler)” section, users can start a conversation with the platform handler regarding the submitted report. To do so, simply click on the “CREATE CONVERSATION” button in the dedicated box.

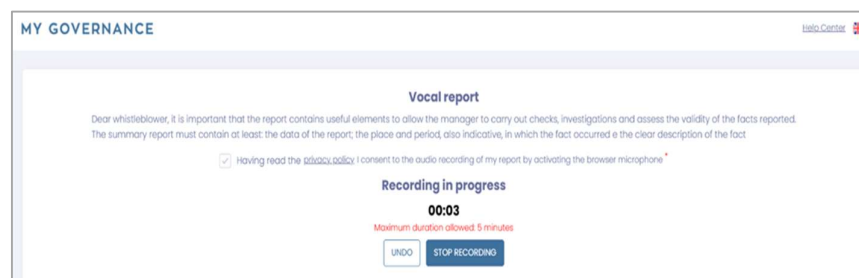
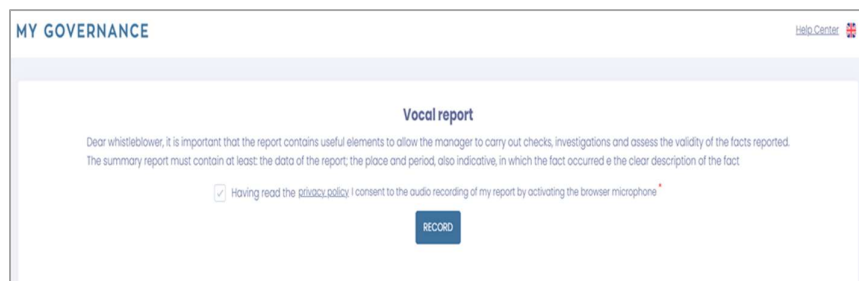
Each time users access the platform again, they must enter the token in the “TRACK REPORT” section by typing the assigned numeric code.



2. VOCAL REPORTING

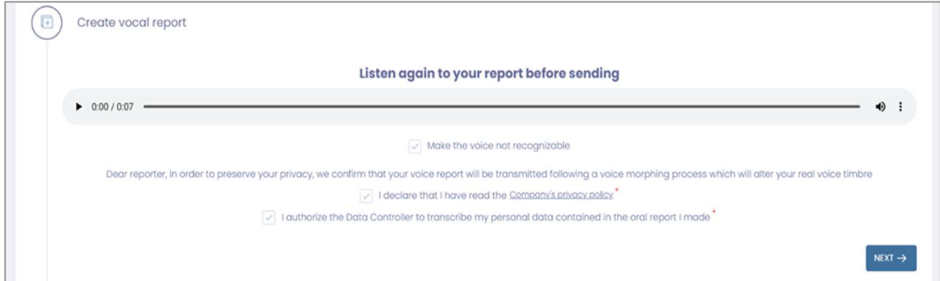


The platform also allows users to submit a report by recording a voice message, by selecting the dedicated option on the introductory page. By clicking on “REPORT” and then choosing the “VOICE” option, users can start the process. After reviewing and accepting the Privacy Policy, they can begin recording the message by clicking the “RECORD” button.



At this stage, users can record their report in voice format, with a maximum duration of 5 minutes, during which they can describe the facts they consider unlawful or non-compliant. By clicking “END REPORT,” the process will continue. However, users can always cancel and restart the recording or choose to submit the report in written form, depending on their preference.


Once the voice message has been recorded, users will be directed to the next page to complete the procedure.



The screenshot shows the 'Create vocal report' page. At the top, there is a title 'Create vocal report' and a sub-header 'Listen again to your report before sending'. Below this is a playback progress bar showing '0:00 / 0:07'. There are three checkboxes for consent: 'Make the voice not recognizable', 'I declare that I have read the Company's privacy policy', and 'I authorize the Data Controller to transcribe my personal data contained in the oral report I made'. A 'NEXT ->' button is located at the bottom right.

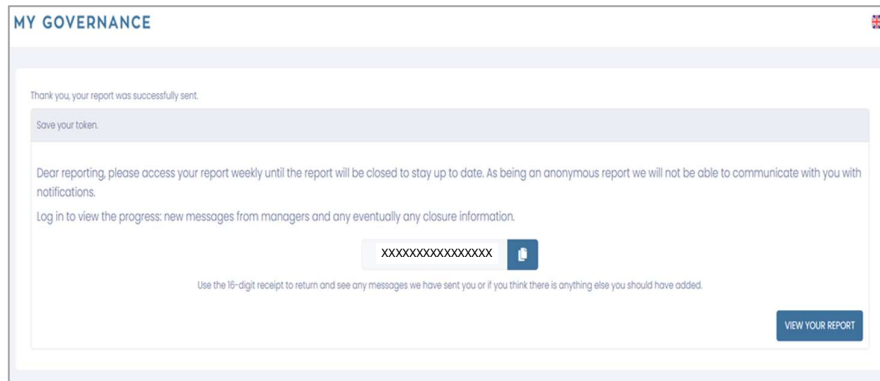
Users can listen back to their recorded voice message and choose, if they wish, to make their voice unrecognizable. After accepting the required conditions, they can proceed by clicking “NEXT.”

In the following step, within the “Type of violation” section (at the bottom left), users are asked to indicate the nature of the unlawful act or irregularity described. Once the selection has been made, the procedure can be completed by clicking the “SUBMIT REPORT” button at the bottom right.



The screenshot shows the 'Type of violation' section of the 'Create vocal report' page. It features a list of radio button options: 'Organizational Model pursuant to Leg. Decree 231/2001', 'Law and/or regulations', 'Business Procedures', 'Business Regulations', 'Other', and four 'New type of violation' options. A '← PREVIOUS' button is on the bottom left, and a 'SEND REPORT' button is on the bottom right.

Similarly to the written reporting procedure, the voice reporting process also ends with a final screen confirming the successful completion and submission of the report.



At the end of the process, the reporting user is provided with a personal token, which must be retained to access the platform again and monitor the report.

By clicking on “VIEW YOUR REPORT,” users can access the final summary screen, similar to that of written reports, with the additional option to listen again to the recorded and submitted voice message.



ADDITIONAL INFORMATION

For all sections to be completed, users may, if necessary, consult the Help Center, which is always available at the top right next to the language selection option.

The Help Center is dedicated to supporting users in case of doubts or the need for clarification regarding how the platform works, as well as for any technical assistance. Access to this area provides a dedicated section where support information and tools are available. Within the “My Whistleblowing” area, users can find additional content and operational guidance related to the reporting system.

From this section, reporters can find answers to key questions regarding the use of the platform through the various entries in the “Tutorial guidance,” or consult the frequently asked questions that arise during system use.

