

# Whistleblowing 2023

English version





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# Revision

(with respect to the previous version)

Policy update for alignment to Legislative Decree No. 24 of 10 March 2023 "Implementation 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 on provisions concerning the protection of persons who report breaches of national laws".

## 1. Purpose

The purpose of this procedure ("**Procedure**") is to regulate the procedure for handling whistleblowing reports, i.e., the requirements and procedures for collecting, managing and filing reports made through the internal channel put in place by Radici Partecipazioni SpA for all RadiciGroup companies.

## 2. Scope

This Procedure applies to all those who:

- intend to make a report of unlawful facts learned in the context of their work at RadiciGroup;
- are involved in the whistleblowing (e.g. facilitators, persons mentioned, witnesses, etc.);
- have been identified as perpetrators of the reported breach;
- are involved in the handling of internal whistleblowing, in all its stages.

## 3. References

### 3.1 Legal source and nature of the Whistleblowing mechanism

RadiciGroup has prepared the following corporate policy in order to comply with Legislative Decree 10 March 2023 No. 24 implementing the Directive (EU) 2019/1937 ("**Whistleblowing Decree**"), which regulates the protection of persons who report breaches of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in the context of their work.

#### **Normative references:**

- Legislative Decree No. 24 of 10 March 2023 "Implementation 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 on provisions concerning the protection of persons who report breaches of national laws";
- Legislative Decree No. 231/2001 "Regulations of the administrative liability of legal persons, of companies and of associations even without a legal status, pursuant to Article 11 of Law no. 300 of 29 September 2000" ("**Decree 231**");
- Directive No. 1937/2019 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law ("**Whistleblowing Directive**");

- Regulation (EU) 2016/679 of the European 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 and repealing Directive 95/46/EC ("**GDPR**");
- Legislative Decree No. 196 of 30 June 2003, containing the "Personal Data Protection Code", as amended by Legislative Decree No. 101/2018 ("**Privacy Code**");
- Resolution No 311 of 12 July 2023 - "Guidelines on the protection of persons who report breaches of Union law and the protection of persons who report breaches of national laws. Procedures for the submission and management of external reports" of the National Anticorruption Authority ("**ANAC Guidelines**");
- "Opinion on the Draft Guidelines on the protection of persons reporting breaches of Union Law and protection of persons reporting breaches of national law provisions - procedures for the submission and handling of external reports - 6 July 2023" by the Italian Data Protection Authority.

## 4. Terms and Definitions

<b>ANAC</b>	National Anticorruption Authority.
<b>Code of Ethics</b>	A document defining the principles and ethical values that guide RadiciGroup in its business activities.
<b>BoD</b>	Board of Directors.
<b>Recipients</b>	Employees, i.e. permanent and temporary staff (executives, middle management, white-collar and blue-collar staff, contractors, interns, trainees), self-employed persons carrying out their activities for the Company (e.g. agents and consultants), shareholders, directors, members of corporate bodies and supervisory bodies, third parties such as business partners, suppliers, customers, persons acting in the name of and/or on behalf of and/or in the interest of the Company or having a professional or business relationship with the Company.
<b>Public disclosure or "public dissemination"</b>	Publication of information about breaches through the press, electronic media or any other means likely to reach a large number of people.
<b>Facilitator</b>	A person who assists the whistleblower in the whistleblowing process, who works in the same work environment and whose assistance must be kept confidential.
<b>GDPR</b>	European Data Protection Regulation 2016/679.
<b>Internal Audit &amp; Compliance</b>	Corporate function entrusted and appointed by RadiciGroup to handle internal whistleblowing (if the RadiciGroup company has not appointed a Supervisory Board), through the established whistleblowing channel.
<b>231 Model</b>	Organisation, Management and Control Model prepared pursuant to Legislative Decree No. 231/2001.
<b>Supervisory Board or SB</b>	Supervisory Board established pursuant to Article 6(1)(b) of Legislative Decree No. 231/2001, which, if appointed, is responsible for following up internal reports through the established whistleblowing channel.
<b>Involved person</b>	A person mentioned in the report as being involved in the reported breach.
<b>Portal</b>	IT tool adopted by the Company for sending and managing internal whistleblowing reports.
<b>Feedback</b>	Providing the whistleblower with information on the follow-up given or intended to be given to the report.
<b>Retaliation</b>	Any conduct, act or omission, even if only attempted or threatened, committed as a result of internal or external whistleblowing or public disclosure that causes or is likely to cause the whistleblower, directly or indirectly, unjustifiable damage.

<b>Whistleblower</b>	A natural person who makes an internal or external report or public disclosure of information about breaches acquired in the course of their employment.
<b>Reported Person</b>	Person mentioned in the internal or external report or public disclosure, understood as the person to whom the breach is attributed.
<b>Report</b>	Written or oral communication of information on breaches, or on conduct, acts or omissions detrimental to the public interest or the integrity of the public administration or private entity, including well-founded suspicions concerning breaches committed or likely to be committed in the organisation, as well as elements concerning conduct aimed at concealing such breaches.
<b>External whistleblowing</b>	Written or oral communication of information on breaches, submitted through the external whistleblowing channel established by ANAC.
<b>Internal whistleblowing</b>	Written or oral communication of information on breaches, submitted through the internal whistleblowing channel established by RadiciGroup.
<b>Follow-up</b>	Action taken by the entity entrusted with the management of the whistleblowing channel to assess the existence of the reported facts, the outcome of the investigation and any measures taken.

For the purposes of this document, the terms and definitions of UNI EN ISO 9000- "Fundamentals and Vocabulary" are applied

## 5. Responsibilities

### 5.1 Procedure management

The responsibilities pertaining to this procedure are as follows:

- Preparation: Internal Audit & Compliance
- Control: Head of Human Resources
- Approval: CEO
- Issue: Corporate Quality & Processes
- Information and Training: Internal Audit & Compliance

### 5.2 Procedure implementation

Application: all **RadiciGroup** functions.

It should be noted that the Procedure is applicable to all RadiciGroup companies, except with regard to the provisions of the Whistleblowing Decree and the Whistleblowing Directive, which may conflict with local regulations applicable to Group companies not based in Italy or Europe.

## 6. Procedure

### 6.1 Who can submit a report

The following persons (so-called Whistleblowers) may submit a Report:

- **employees** of RadiciGroup, including workers with temporary, apprentice, ancillary or casual, fixed-term, part-time or occasional employment relationships;
- **self-employed workers** who carry out their activities for RadiciGroup, e.g., workers holding a work or service contract of intellectual performance with the Group;
- those **with a collaborative relationship** who carry out their activities on behalf of RadiciGroup, e.g. those with an agency, sales representative or collaborative relationship in the form of a continuous and coordinated service, predominantly personal, including if not subordinate, the manner of execution of which is organised by RadiciGroup;
- **freelancers and consultants** working for RadiciGroup;
- **volunteers and trainees**, paid and unpaid, working at RadiciGroup;
- **shareholders**, i.e., those who hold RadiciGroup shares who have become aware of the reported breaches in the exercise of their rights;
- persons with functions of **administration, management, control, supervision or representation** in the Company, even if such functions are de facto exercised within RadiciGroup.

It should be noted that for all of the above, the protection applies even if the information about breaches was obtained during a probationary period and before or after the employment or legal relationship was established.

### 6.2 Subject matter of the report

Reports must have as their subject matter:

- the commission, even attempted commission, of offences under Decree 231;
- any irregular conduct or breach, whether active or passive, committed or attempted, of the Code of Ethics, 231 Models, including regulations, directives, policies and procedures, internal protocols of the Group companies or the rules applicable to the RadiciGroup;
- breaches of European legislation, i.e. offences committed in breach of the European Union acts listed in Annex 1 of the Whistleblowing Decree and the Italian provisions implementing it, relating to the following areas:
  - public contracts, such as, for example, breach of the procedural rules for the award of public contracts and concessions;
  - financial services, products and markets and the prevention of money laundering and terrorist financing;
  - safety and conformity of products;
  - transport security;
  - environmental protection;
  - radiation protection and nuclear safety;
  - food and feed safety and animal health and welfare;
  - public health;
  - consumer protection;
  - protection of privacy and protection of personal data and security of networks and information systems.
- acts or omissions affecting the financial interests of the European Union, as identified in EU regulations, directives, decisions, recommendations and opinions;

- acts or omissions relating to the internal market that jeopardise the free movement of goods, persons, services and capital;
- acts or conduct that frustrate the object or purpose of the provisions of the acts of the European Union in the areas indicated in the preceding points.

Reports may also relate to breaches not yet committed that the whistleblower reasonably believes could be committed on the basis of concrete evidence. Such elements may also include irregularities and anomalies which the whistleblower believes may give rise to one of the above breaches. Should the Whistleblower make reports that prove to be futile, false, unfounded, defamatory or in any event deliberately erroneous or misleading with the sole purpose of harming RadiciGroup, the Reported Person or other persons involved in the report, the Group reserves the right to take appropriate measures, including the adoption of appropriate disciplinary sanctions.

## 6.3 Internal whistleblowing

### 6.3.1 Content of the Report

The Report must relate to circumstances that have come to the attention of the Whistleblower in the course of their own work, so that the Internal Audit & Compliance Department or the Supervisory Board, as appropriate, can conduct the appropriate and necessary internal reviews and investigations to assess the merits of the Report and the criticality of the reported conduct.

The Report must clearly state the following information:

- personal details or other elements enabling the identification of the person to whom the reported facts can be attributed, if known;
- the circumstances of time and place in which the reported event occurred;
- description of the facts;
- any other involved parties;
- any documents that may provide details on which to base the report.

It should also be noted that it is the right of the Whistleblower to choose to remain anonymous and therefore not to specify the information necessary for their identification; however, it is also made clear that anonymous Reports are only considered if they are properly substantiated and detailed.

If the Report is not sufficiently and adequately substantiated, the Internal Audit & Compliance function or, where present, the Supervisory Board may request additional information from the Whistleblower, in compliance with the protections provided for by the Whistleblowing Decree and their possible choice to remain anonymous.

### 6.3.2 Whistleblowing methods and addressees

- The internal body to which all reports are addressed is the Internal Audit & Compliance function (corporate function) or, where present, the RadiciGroup's Supervisory Board, due to their autonomous and independent nature. Both bodies are obliged to maintain the confidentiality of the identity of Whistleblowers and to carry out all necessary and appropriate checks on the merits of the Report.

- Depending on the content of the Report, access may also be extended to persons expressly authorised by the Supervisory Board or the Internal Audit & Compliance function, if this is absolutely necessary to carry out investigative activities or to exercise powers beyond their remit (e.g. exercise of disciplinary powers against the offender in the case of a well-founded Report).
- If the Internal Report is submitted to another person (i.e. not through the Portal or the reporting methods described below) and the Whistleblower expressly declares that they wish to benefit from the whistleblowing protection, the Internal Report must be forwarded to the Supervisory Board or the Internal Audit & Compliance Department within 7 days of its receipt and the Whistleblower must be informed at the same time.

**Reports of misconduct** may be made in one of the following **ways**:

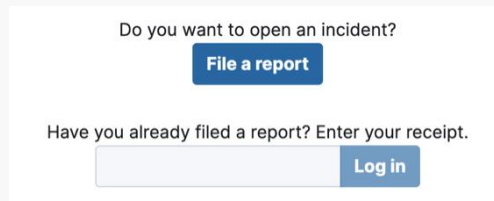
- by filling in the questionnaire on the Whistleblowing Portal, which can be accessed via the following link, <https://whistleblowing.radicigroup.com/>;
- orally, in a direct meeting with the Internal Audit & Compliance department or, where present, the Supervisory Board;
- by sending a notice by post to the address Radici Partecipazioni SpA
  - Supervisory Board, Via Verdi, 11 - Italy - 24100 Bergamo
- by sending a notice by post to the address Radici Partecipazioni SpA
  - Internal Audit & Compliance Department, Via Ugo Foscolo, 152 - Italy - 24024 Gandino (BG)

The Anac guidelines suggest the following procedure for Reports sent by post: use a first envelope with the Whistleblower's identifying information and a photocopy of the identity document inside; place it in a second envelope containing the Report, so that the whistleblower's identifying information is separated from the Report; both should then be placed in a third sealed envelope marked "confidential" on the outside for the whistleblowing officer.

### 6.3.3 How to use the Whistleblowing Portal

RadiciGroup has equipped itself with an IT portal to allow the submission of Reports in a simple and guided manner. A Whistleblower using the Portal must follow the following steps:

- log on to <https://whistleblowing.radicigroup.com/> and click on the "File a Report" button to access the Portal;



- select the context of the Report by choosing the RadiciGroup company to which the Report is to be addressed and clicking on the box of the chosen company;
- fill in the questionnaire, which consists of open or closed questions (with a drop-down option), some of which are mandatory (marked with an asterisk), for the following three fields:





- on the third page, "Final step", click the "Terms and Conditions" and "Privacy Policy" confirmation box and then click the "Submit" button.

**Privacy disclaimer \***

PRIVACY POLICY

1. Data Controller and Joint Data Controllers  
 The personal data collected as part of Whistleblowing reports are processed by the company Radici Partecipazioni S.p.A., with registered office in via Verdi No. 11, Bergamo, as Data Controller, in compliance with European Regulation 2016/679 on data protection ("GDPR" or "Regulation").  
 The Data Controller is joined by the following companies:


- Cordonsed SA, with registered office at Av. Luis M. Campos 1061 Piso 3° A C142680I CABA, email info.cordonsed@radicigroup.com;
- Geoenergie S.p.A., with registered office at Via Cà Antonelli, 55, 24024 Gandino (BG), email geoenergie.pec@legalmail.it;

By checking this box you confirm that you accept Privacy disclaimer

- immediately after submitting the report, the portal generates a unique identification code that allows the Whistleblower to access the Personal Report page from the home page (warning: if lost, there is no way to recover the code).

Thank you. Your report was successful. We will try to get back to you as soon as possible.

Remember your receipt for this report.

5762 7486 4166 9424 

Use the 16 digit receipt to log in. It will allow you to view any messages we sent you, and also to add extra info.

- on the Personal Report page, the Whistleblower can check the status of the Report sent or interact with the person who received and is handling the Report via the "Comments" option, while remaining anonymous if they have chosen to report in this way.

Comments ^

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The Whistleblower must also be aware that:

- the Portal allows for the submission of anonymous reports, but in order to be taken into account, they must be duly substantiated and detailed (once the Report has been submitted and the procedure has been opened, the Whistleblower may provide their personal details at a later stage and only through the "comments" option on the Personal Report page);
- Access to the Portal guarantees the confidentiality and anonymity of the Whistleblower thanks to the "no-log" tool that prevents the IP address from which the Report originates from being identified by computer systems;
- if, despite the anonymous Report, the Whistleblower is subsequently identified and suffers any retaliation as a result of the Report, they shall benefit from the protection measures indicated in paragraph 6.5 of this Procedure;
- Reports made through the Portal are visible and processed only by the Internal Audit & Compliance function and the Supervisory Board.

It is understood that the principles set out in this procedure do not affect or limit in any way the obligations to report to the judicial authorities and to the competent supervisory or regulatory bodies in the countries in which RadiciGroup companies operate.

## 6.4 Report investigation activities (preliminary investigation and specific in-depth investigations)

### 6.4.1 Preliminary investigation activities

When they receive a Report, the functions in charge:

- issue the Whistleblower with an acknowledgement of receipt of the Report within 7 days of its receipt;
- carry out a preliminary activity to verify the existence of data and information useful for assessing the validity of the Report.

Therefore, first the Internal Audit & Compliance function or the Supervisory Board assesses:

- if the Report is well-founded;
- if the subject matter of the Report belongs to one of the cases specified in paragraph 6.2;
- if the Report does not fall within one of the cases of reports excluded from the scope of the Whistleblowing Decree.

Upon completion of the preliminary investigation, the Supervisory Board or the Internal Audit & Compliance function may:

- close the Report case if it has established that:
  - (i) it is unfounded;
  - (ii) the act is not unlawful or does not meet the requirements of the Whistleblowing Decree;
  - (iii) the content is such that the facts cannot be understood, or the Report is accompanied by inappropriate documentation or such that its content cannot be understood.

The decision to close the case must always be justified and communicated in writing to the Whistleblower;

- **contact the Whistleblower, by means of the messaging tool integrated in the Portal or by telephone**, to request further information, if it considers that the Report is not sufficiently detailed or lacks the information necessary for the investigation (if the additional information received from the Whistleblower is still insufficient, the Report case will be closed);
- **proceed with specific in-depth investigations**, if it has considered the Report to be well-founded, as set out in paragraph 6.4.2 below.

### 6.4.2 Specific in-depth investigations

If the Supervisory Board and/or the Internal Audit & Compliance function concludes the preliminary investigation with a positive result, a more specific and in-depth investigation of the reported facts will be conducted.

During and in the course of investigation, the Supervisory Board and/or the Internal Audit & Compliance department may:

- seek the assistance of external consultants appointed for the purpose, or the cooperation of other corporate functions, when the nature and complexity of the investigations require their involvement;

- request to speak with the Whistleblower, the Reported Person and any other person involved who may be able to provide information relevant to the investigation of the reported facts;
- agree an action plan with the head of the department affected by the reported irregularity/breach to address the control or organisational deficiencies that contributed to or facilitated the commission of the offence.

In any event, the Supervisory Board or the Internal Audit & Compliance function must:

- proceed with the preparation of its findings report, at the end of the investigation, indicating: the reference context of the Report, the relevant regulatory and procedural framework, the checks carried out and their results, and the observations made;
- proceed with the archiving of all documentation relevant to the investigation, including the findings report, in such a way as to prevent third party access to the information and documents;
- promptly report to the administrative body of the RadiciGroup company any critical issues identified as a result of the investigation;
- notify the outcome of the findings to the department responsible for exercising disciplinary power, so that the necessary management measures may be taken and, if necessary, disciplinary action may be taken;
- notify the Whistleblower in writing of its findings, within 3 months from the date of the acknowledgement of receipt of the Report or, in the absence of such an acknowledgement, within 3 months from the expiry of the 7-day period from the submission of the Report. The acknowledgement may consist of the announcement of closing, the status of the investigation, the opening of an internal investigation and possibly its findings, the measures taken to address the issue raised, etc.

## 6.5. Protections provided by the internal whistleblowing channel

### 6.5.1 Confidentiality

Anyone who reports unlawful conduct exposes themselves personally, risking future retaliation by the Reported Person or others. Precisely for this reason, and to prevent Reported Persons from reporting wrongdoing in order to avoid adverse consequences, the law provides for specific safeguards in favour of Whistleblowers, facilitators, involved persons and any persons mentioned in the Report.

First of all, the Whistleblower is guaranteed confidentiality with regard to their identity.

RadiciGroup ensures this protection by granting access to the Report and to the personal data of the Whistleblower only to the Supervisory Board of the company concerned, if any, or to the Internal Audit & Compliance function, thus preventing third parties or unauthorised persons from gaining knowledge of the information contained in the Report.

The identity of the Whistleblower may be disclosed to persons other than those competent to know in the following cases:

- with the express consent of the Whistleblower;
- within the framework of criminal proceedings on the acts carried out in the preliminary investigation "*until the defendant can have knowledge of them and, in any event, no later than the closure of the preliminary investigation*";
- in the proceedings before the Court of Auditors, until the investigation stage is closed;
- within the framework of the disciplinary proceedings instituted, to the perpetrator of the breach, where the allegation of the disciplinary charge is based on investigations that are separate and additional to the Report, even if consequent to it. If the charge is based, in whole or in part, on the Report, and knowledge of the identity of the Whistleblower is

indispensable for the accused's defence, the Report will be usable for the purposes of the proceedings only if the Whistleblower consents to the disclosure of their identity.

This prohibition also applies to any information or element of the Report, including any attached documents, from the disclosure of which the identity of the Whistleblower could be directly or indirectly inferred.

In addition to requesting the Whistleblower's consent, the Whistleblowing Officer will communicate in writing the reasons why the disclosure of their identity is deemed necessary.

If the RadiciGroup company has adopted a 231 Model, it must provide for specific disciplinary sanctions against those who breach the duty of confidentiality in the handling of Reports.

## 6.5.2 The prohibition of retaliation and protection measures

A further safeguard provided for in favour of the Whistleblower is the prohibition of any form of retaliation against them and on account of the Report made by them.

Any form of retaliation, even if only attempted or threatened, directly or indirectly, affecting the working conditions of the Whistleblower, for reasons directly or indirectly linked to the Whistleblowing, will therefore not be tolerated.

Examples of retaliatory conduct include, but are not limited to:

- dismissal, suspension or equivalent measures;
- relegation in grade or non-promotion;
- change of duties, change of workplace, reduction of salary, change of working hours;
- suspension of training or any restriction of access to it;
- written warnings or negative references;
- the adoption of disciplinary measures or other sanctions, including fines;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavourable treatment;
- the failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the employee had a legitimate expectation of such conversion;
- non-renewal or early termination of a fixed-term employment contract;
- damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- inclusion in improper lists on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- early termination or cancellation of the contract for the supply of goods or services;
- cancellation of a licence or permit;
- the request to undergo psychiatric or medical examinations.

Retaliation, even if only attempted or threatened, must be reported exclusively to ANAC, which is responsible for ascertaining that it is a consequence of the Report.

If it is the Whistleblower who claims to have suffered retaliation, the onus is on the perpetrator of the alleged retaliation to prove that the retaliation, if any, is in no way connected to the Whistleblowing.

Those who engage in such behaviour may be subject to disciplinary proceedings.

The protection against retaliation does not apply if the Whistleblower has been found criminally liable for defamation or libel, or in any event for the same offences committed in connection with the whistleblowing, or has been found civilly liable for intentionally or negligently reporting false information, even if the decision is not final and absolute in a court of first instance. In cases where such liability is established, a disciplinary sanction may be imposed on the Whistleblower.

If the RadiciGroup company has adopted a 231 Model, it must provide for specific disciplinary sanctions against those who breach the prohibition of retaliation.

Other protected persons do not benefit from the reversal of the burden of proof<sup>1</sup>, who, unlike the Whistleblower, will have to prove the consequential relationship between retaliation and Whistleblowing.

## 6.6 Other whistleblowing channels

### 6.6.1 External whistleblowing to the ANAC

In addition to the use of the internal whistleblowing channel, the reporting party may make a report through the external channel set up by ANAC, by accessing the link <https://whistleblowing.anticorruzione.it/#/>

A Whistleblower may use the external whistleblowing channel in the following cases:

- if the Company's internal channel is not active, or is active but does not comply with the legislator's requirements concerning the subjects and modalities for submitting Reports;
- the Whistleblower has already made an internal report but it has not been followed up;
- the Whistleblower has reasonable grounds to believe that if they made an internal Report, it would not be effectively followed up, i.e. it could lead to a risk of retaliation;
- the Whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

The methods through which the Whistleblower can make an external Report to ANAC are defined by the latter and indicated on ANAC's website in a dedicated section.

### 6.6.2 Public disclosure

With public disclosure, information on breaches is brought into the public domain through the press or electronic media or otherwise through means of dissemination capable of reaching a large number of people.

A Whistleblower may resort to public disclosure in the following cases:

- an internal Report to which the Company did not provide a reply within the deadline was followed by an external Report to the ANAC, which, in turn, did not provide a reply to the Whistleblower within a reasonable time;
- the Whistleblower has already made an external Report to ANAC, which, however, has not provided feedback on the measures planned or taken to follow up the Report within a reasonable timeframe;
- the Whistleblower directly makes a public disclosure because they have reasonable grounds to believe, on the basis of concrete circumstances and thus not on mere inferences, that the breach may pose an imminent or obvious danger to the public interest;
- the Whistleblower directly makes a public disclosure because they have reasonable grounds to believe that an external Report may involve the risk of retaliation or may not be effectively followed up.

It should be noted that in public disclosure, if the Whistleblower voluntarily discloses their identity, they may not avail themselves of the protection of confidentiality, without prejudice to all other forms of protection provided for in the Whistleblowing Decree. If, on the other hand, the Whistleblower uses a pseudonym or nickname, thus not allowing their identification, the public disclosure will be treated as an anonymous report.

### 6.6.3 Reporting to the judicial authority

Finally, a Whistleblower has the option of turning to the judicial authorities, to file a complaint of unlawful conduct of which they have become aware in their work context.

The same rules on the protection of confidentiality and the content of Reports must be respected by the offices of the judicial authorities to which the complaint is made.

## 7. Sanctions

In order to ensure that this Procedure is adequately implemented and followed, RadiciGroup applies the sanctions apparatus in compliance with applicable law, the individual national collective bargaining agreements and internal rules, should bad faith (slandorous or defamatory) reports or unlawful or irregular conduct emerge:

- against those responsible for any act of retaliation or any other unlawful prejudice, direct or indirect, against the Whistleblower and other protected persons, for reasons directly or indirectly linked to the Whistleblowing;
- against those who have obstructed or attempted to obstruct the Report;
- against those who have breached their duty of confidentiality;
- against the Reported Person, for the responsibilities established;
- against anyone who breaches the protections provided for in paragraph 6.5 of the Procedure;
- against those who have made an unfounded Report with malice or gross negligence.

Disciplinary measures will be proportionate to the extent and seriousness of the misconduct established.

For employees of Italian companies, reference will be made to Art. 7 of the Workers' Statute, and in particular to the dispute and sanction procedures laid down in national collective bargaining agreements.

Furthermore, where applicable, reference is made to the General Part of the 231 Model adopted by the RadiciGroup company.

This Procedure must be respected and applied not only by RadiciGroup employees and managers, but also by all persons who have some kind of working relationship with RadiciGroup (i.e: collaborators, consultants, temporary workers, proxies and agents, but also all partners and suppliers).

Therefore, RadiciGroup requires that contracts and/or letters of engagement expressly include clauses providing for compliance with this Procedure, as an integral part of the Code of Ethics, by the external contractor, and stating the sanction in the event of breach of this Procedure:

- a warning for timely compliance with the Procedures;
- the application of a penalty, also in the event of non-compliance with the warning, set at a percentage of the agreed fee;
- termination of the contract.

## 8. Record keeping and privacy protection

In order to ensure the management and traceability of Reports and related activities, all the documentation relating to the Report is kept for the time necessary to process the specific report and in any case no later than 5 (five) years from the

date of the completion of the checks on the Report or, in the case of legal or disciplinary proceedings, until the conclusion of the proceedings and the expiry of the time limit for lodging an appeal.

When, at the request of the Whistleblower, the Report is made orally in the course of a meeting with the Internal Audit & Compliance department or the Supervisory Board, it is documented, with the Whistleblower's consent, by means of minutes. In the case of minutes, the Whistleblower may verify, correct and confirm the minutes of the meeting by their signature.

The personal data contained in the Report are processed by each RadiciGroup company, in their capacity as Joint Data Controllers, in accordance with and in compliance with the applicable data protection rules, providing appropriate information to the Whistleblower and the persons involved pursuant to articles 13 and 14 of the GDPR, as well as taking appropriate measures to protect the rights and freedoms of data subjects.

To this end, the Portal contains information on the processing of personal data carried out in connection with the handling of Reports governed by this Procedure.

Only expressly authorised and previously instructed persons will have access to the data, through adequate and specific professional training aimed at developing their specialised skills, also with regard to data protection regulations, data and information security.

In addition to this, RadiciGroup, in line with the provisions of Art. 13 of the Whistleblowing Decree, as well as in compliance with the provisions of Art. 23 of the GDPR, has identified technical and organisational measures suitable for guaranteeing a level of security appropriate to the specific risks arising from the processing operations performed, on the basis of a Data Protection Impact Assessment ( DPIA), as well as measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

In this respect, personal data that are manifestly not useful for the handling of the whistleblowing shall not be collected or, if accidentally collected, shall be deleted without delay.

## 9. Distribution and training

This Procedure must be made known to all RadiciGroup employees and to those who interact in any capacity with it, through communication, information and training. To this end, RadiciGroup makes this Procedure available at <https://www.radicigroup.com/en/corporate/radicigroup/ethics>

## 10. Updating the Procedure

This Procedure will be reviewed periodically to ensure constant alignment with regulatory changes, as well as in relation to experience gained. Recipients are therefore invited to regularly access the website

<https://www.radicigroup.com/en/corporate/radicigroup/ethics> to check the publication of the most recent and updated Procedure.



[radicigroup.com](http://radicigroup.com)