

WHISTLEBLOWING DISCLAIMER

FIAM Utensili Pneumatici S.p.a. (the “Company”) aware of the importance of activating adequate reporting channels in order to protect the integrity of the company and guarantee compliance with the principles of legality, fairness and transparency, also towards third parties, in the exercise of Company activities, has activated specific company reporting channels in compliance with the Italian Legislative Decree no. 24/2023 (transposition of the European Directive 2019/1937 on Whistleblowing).

With this notice, FIAM Utensili Pneumatici S.p.a. intends to promote the widest diffusion among all recipients of any useful information on the channels, procedures and conditions for making both internal and external reports.

WHO CAN MAKE THE REPORT

People who operate in the corporate working context as:

- **employed persons;**
- **self-employed** workers and **collaborators** working for the Company;
- **freelancers** and **consultants** working for the Company;
- **volunteers** and **trainees**, paid and unpaid, who work for the Company;
- **shareholders** and persons with **administrative, managerial, supervisory or representative functions**, even if these functions are performed merely *de facto* at the Company,

even when the **legal relationship has not yet begun**, if the information on infringements was acquired during the selection process or at other pre-contractual stages or **during the probationary period** or **after the termination of the legal relationship** if the information on the infringements was acquired during the relationship itself.

WHAT BEHAVIORS MAY BE REPORTED

Relevant Reports are constituted by reports concerning behaviours, acts or omissions which harm the public interest or the integrity of the Company of which the whistleblower has become aware in the working context and which consist of:

- offenses that fall within the scope of application of European Union acts relating to the following **sectors**: public contracts, financial services, products and markets and prevention of money laundering and terrorist financing; product security and conformity; transport safety; environmental protection; public health; consumer protection; privacy and data protection; security of networks and security of information systems;
- acts or omissions that harm the **financial interests of the European Union**, such as fraud, corruption and any other illegal activity related to Union expenditure;
- acts or omissions relating to the **internal market**, including infringements of EU competition and state aid rules as well as corporate tax, **free movement of goods, persons, services and capital**;



- acts or behaviors that nullify the object or purpose of the provisions of the European Union acts indicated above. For example, the so-called **abusive practices** that contravene the protection of **free competition** (adoption of predatory pricing, target discounts, combined sales, etc.).

Reports linked to a **personal interest** of the reporting party which relate **exclusively** to their individual working relationships, or inherent to their working relationships with hierarchically superior figures or to aspects of the reported person's life, without any direct or indirect connection with the Company and/or professional activity, are **excluded** from the scope of application of the regulations.

Also **excluded** are news that is **evidently groundless**, information already totally in the **public domain**, information acquired only on the basis of rumors or poorly reliable or pretext, **defamatory**, slanderous or aimed solely at damaging the reported person.

CHARACTERISTICS OF THE REPORTING

In order to guarantee adequate treatment, the report must be as detailed as possible in order to allow the verification of the facts by the subjects competent to receive and manage the reports. In particular, the following should be indicated:

- **the identification data** of the reporting person (name, surname, place and date of birth) and in the case of use of the **paper mail channel** or **direct meeting**, an address where to receive the acknowledgment of receipt of the report and subsequent feedback, as well as any requests for additions and clarifications;
- the **circumstances of time** and **place** in which the event which is the subject of the report occurred and, therefore, a **description of the facts** which cover by the report, specifying the details relating to the circumstantial information and, where present, also **the ways in which it became aware of the facts reported**;
- **personal details** or other **elements** that allow identifying the person to whom the reported facts can be attributed;
- any **attached documents**;
- any persons potentially aware of the facts.

In the case of receipt of **anonymous reports**, it is specified that the same, **only** if they are punctual, detailed and supported by appropriate documentation, will be considered and treated as ordinary reports even with the same internal procedures provided for whistleblowing reports.

INTERNAL REPORTING CHANNELS

In order to allow the transmission of written or oral Relevant Reports, the Company, **after consulting the Unitary Workplace Union Structures**, activates and keeps open the following reporting channels:

- a) the following **postal address**: registered office of FIAM Utensili Pneumatici Spa, Viale Crispi n. 123, 36100 Vicenza, Italy; the reporting person must enter the report in **two closed envelopes**, including, in the first, their **identification data, together with an identity document**; in the second, the **subject of the alert**. Both envelopes must then be inserted in a **third envelope** with the indication "**Whistleblowing Report**" or "**Reserved to the Channel Manager**".



- b) the following **oral channel**: phone line active from 08:30 to 12:30 and from 13:30 to 17:30 at +39 3485258810 or +39 3783013794. In order to ensure confidentiality, the whistleblower must immediately notify that he/she intends to make a "**Whistleblowing Report**".

Where requested by the reporting person, it is possible to fix a **direct meeting** with the Channel Manager. The direct meeting is held **exclusively** by the Channel Manager with confidential methods and by drafting the report form.

The Company, in full compliance with the Whistleblowing Decree, guarantees that the above channels ensure the confidentiality of the **identity** of the **reporting person**, the **person involved** and the person **mentioned** in the report, and the **content** of the report and its **documentation**.

The management of the reporting channel is entrusted to a **Whistleblowing Committee** (the "**Channel Manager**") composed of Managing Directors Sofia Casolo and Nicola Bacchetta and Company Legal Counsel Giovanna Rigo.

PROCEDURES FOR MANAGING REPORTS

The Channel Manager performs the following activities:

- issues an **acknowledgement of receipt** of the report to the reporting person **within seven days** of the date of receipt;
- maintain **contacts** with the reporting person and may request **additions** from the reporting person if necessary;
- diligent **follow-up** to the reports received by activating the entities in charge of managing the report;
- provides feedback to the reporting party within **three months** from the date of the acknowledgement of receipt or, in the absence of such notification, within three months of the expiry of the seven-day period following the submission of the report. This feedback may also have an **interlocutory nature** if the investigation has not yet been completed. After the investigation, the results must be communicated to the reporting person.

For the **adequate processing** of the report, internal or external subjects may be involved, in consideration of the specific technical and professional skills required, which are not in conflict of interest and will in any case be bound to the confidentiality obligations established by the law.

At the outcome of the investigation, if the report is well founded, the Channel Manager will contact the internal bodies/ functions responsible for the follow-up to activate preventive, corrective or disciplinary actions against the reported person.



THE EXTERNAL REPORTING CHANNEL (ANAC)

In order to use the reporting channel established by ANAC (National Anti-Corruption Authority), certain conditions must be met. In particular, the whistleblower may refer to the external procedure only if one of the following conditions is met: in his/her working context the internal corporate reporting channel is not active or, even if activated, it does not comply with Legislative Decree no. 24/2023; has already made an internal report and it has not been followed up; has reasonable grounds to believe that, if he/she made an internal report, it would not be followed up effectively or the report itself could lead to the risk of retaliation; has reasonable grounds to believe that the violation may constitute an imminent or manifest danger to the public interest. Any retaliation suffered can be reported to the same channel. See <https://www.anticorruzione.it/-/whistleblowing>

The personal data will be processed in accordance with GDPR n. 679/2016 and the Italian Legislative Decree no. 24/2023. For further information on data processing, please refer to: **Privacy Whistleblowing** - Information pursuant to articles. 13 and 14 GDPR on the processing of personal data in the context of whistleblowing reports.

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The CEOs Sofia Casolo and Nicola Bacchetta

