




SINELEC S.P.A.

Inter-departmental procedure

**MANAGEMENT OF REPORTS
(WHISTLEBLOWING)**

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EDITED	SIGNATURE	
HEAD OF INTEGRATED MANAGEMENT SYSTEMS, RISK MANAGEMENT & SUSTAINABILITY	A. MANZO	


VERIFIED	SIGNATURE	
HEAD OF PERSONNEL ADMINISTRATION AND INDUSTRIAL RELATIONS DEPARTMENT	R. DEGIOVANNI	
HEAD OF LEGAL AFFAIRS	D.BRANCALEONE	
HEAD OF INTERNAL AUDIT	A.MANZO	

PROCESS OWNER	SIGNATURE	
HEAD OF INTEGRATED MANAGEMENT SYSTEMS, RISK MANAGEMENT & SUSTAINABILITY	A.MANZO	


APPROVED	SIGNATURE	
CHIEF EXECUTIVE OFFICER	M.BLANDINO	

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This procedure (hereinafter the "Procedure") is effective from the date of issuance and is valid indefinitely, unless supplements or replacement procedures are issued.

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1. PURPOSE AND RECIPIENTS

The purpose of this procedure (“**Procedure**”) is the regulation of the process of receiving, analysing and managing the Reports sent or transmitted by anyone (“**Recipients**”), including anonymously.

The Recipients of the Procedure include the members of the corporate bodies and of the Supervisory Body of Sinelec S.p.A, all employees of Sinelec S.p.A., partners, customers, suppliers, consultants, collaborators, shareholders and, more generally, any individual in an interest relationship with Sinelec S.p.A.

Recipients, aware of facts and/or behaviour that could potentially be the subject of a Report, are invited to report promptly using the methods described below.

2. SCOPE

The procedure applies to Sinelec S.p.A. (“**Sinelec**” or the “**Company**”) which guarantees its correct and constant application, as well as its maximum internal dissemination.

The Procedure also constitutes a reference for the subsidiaries of Sinelec S.p.A, which are invited to implement it, subject to adaptation to the specific and/or local regulations, processes and organisational structures.


3. REFERENCES

The procedure refers to the following Sinelec S.p.A documents:

- Code of Ethics and Conduct
- Sustainability Policies
- Supplier Code of Conduct
- Organisation, management and control model pursuant to Legislative Decree no. 231/2001 (“**Model 231**”)
- Organisational chart
- Company Organisational Communications
- Data Privacy Policy
- Proxies


With reference to the Procedure, the following apply:

- the Management System for the Prevention of Corruption pursuant to the UNI ISO 37001 standard
- the UNI EN ISO 9001 Quality Management System
- the SA 8000 Social Accountability Management System
- the EU Regulation 2016/679 (**GDPR**) and the Legislative Decree 196/2003
- the EU Directive 2019/1937
- Legislative Decree no. 24 of 10 March 2023 (“**Decree**”)

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4. DEFINITIONS

Sinelec	Directors, members of the Board of Statutory Auditors, members of the Supervisory Body and employees of Sinelec (permanent and non-permanent, including interns and candidates and, in general, individuals who hold senior and subordinate roles).
Facilitator	A natural person who assists the Whistleblower in the reporting process, operating within the same working context and whose assistance must be kept confidential.
Group	ASTM and the Italian or foreign entities controlled by ASTM pursuant to IFRS 10 - Consolidated Financial Statements (“power to direct the relevant activities and be exposed to the variability of results”)
Digital Platform	IT tool used by Sinelec as a Whistleblowing channel able to guarantee the confidentiality of the identity of the Whistleblowers.
Receiver	The Head of the Internal Audit Function or, if the Report concerns the latter, the Chairman of the Supervisory Body.
Whistleblowers	<p>The natural person who files the Report or public disclosure of information on violations acquired in the context of their work.</p> <p>The Sinelec Entities are included among the Whistleblowers, as well as all those who, for various reasons, maintain collaboration or business relationships with Sinelec, including collaborators, temporary workers, consultants, agents, intermediaries, suppliers, in relation to work, collaboration or business performance with Sinelec.</p>
Report	<p>The written or oral communication of information concerning violations.</p> <p>Reports cannot concern:</p> <ol style="list-style-type: none"> a) disputes, claims or requests related to a personal interest of the Whistleblower or of the individual who has filed a complaint to the judicial or accounting authority which pertain exclusively to their individual employment relationships, or inherent to their employment relationships; b) reports of infringements which are already regulated on a mandatory basis by

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European Union or national acts relating to financial services, products and markets and the prevention of money laundering and terrorist financing, transport security and environmental protection or by national implementing of the European Union acts indicated in Part II of the Annex to Directive (EU) 2019/193725;


- c) reports of breaches of national security, as well as procurement related to national security or defence aspects, unless such aspects are covered by the relevant secondary legislation of the European Union.

Anonymous Reporting Report in which the personal details of the Whistleblower are not explicit, nor can they be identified unambiguously.

Evaluation Team Interfunctional body made up of the Head of the Legal Affairs Function, a Contact Person from the Personnel Administration and Industrial Relations Department, and the Receiver (Internal Audit Manager). In the event that the Report concerns the Head of the Legal Affairs Function or the Contact Person of the Personnel Administration and Industrial Relations Department, the person receiving the Report will be replaced by the Chief Financial Officer.

Violations Behaviours, acts or omissions that harm the public interest or the integrity of Sinelec. Violations can be divided into the following categories:

- a) violations of national and European provisions which consist of offences concerning the following sectors: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; 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;
- b) violations of European provisions consisting of: i) acts or omissions affecting the financial interests of the Union; (ii) acts and omissions relating to the internal market; iii) acts and behaviours that frustrate the object or purpose of the provisions of the Union acts in the aforementioned sectors;
- c) violations of national provisions consisting of: i) administrative, accounting, civil or

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- criminal offences; ii) relevant unlawful conduct pursuant to Legislative Decree 231/2001 or violations of organisational and management models;
- d) violations of regulatory instruments pertaining to the areas defined in Sinelec’s compliance or concerning facts or behaviours contrary to (or in contrast with) the responsibility assumed by Sinelec to respect the human rights of individuals or communities, and attributable to the following categories: (i) health, safety and security of local communities; (ii) violation of workers’ rights and (iii) occupational health and safety.


5. GENERAL PRINCIPLES

The Recipients of the Procedure, depending on and within the specific responsibilities assigned by the Procedure, must:

- foster and promote a culture of transparency, legality and zero tolerance towards any act or manifestation of corruption in all company spheres and in relations with third parties;
- file reports in good faith, and that are substantiated and based on accurate and consistent facts;
- refrain from making unfounded or unsubstantiated reports based on unconfirmed rumours or hearsay, or reports not falling within the scope of the Procedure detailed herein;
- not use reports as tools to resolve personal issues or for the sole purpose of damaging the reported individual or for opportunistic reasons;
- foster and safeguard the positive conduct, physical integrity and moral rectitude of employees or contractors who report illicit acts or unlawful conduct of which they become aware;
- give serious consideration to the information received and evaluate it scrupulously and carefully;
- guarantee the confidentiality of the identity and personal data of the Whistleblower, of the individual(s) subject of the Report, of the Facilitators;
- avoid acts of retaliation or discrimination, direct or indirect, against those who file the Report. Guarantee the same protection (i) to Facilitators, (ii) to individuals who are connected to the Whistleblower who could suffer retaliation in a work context, such as work colleagues who have a regular or recurring relationship with the individual; (iii) to individuals in the same working context who are linked to the Whistleblower by a stable emotional or kinship bond within the fourth degree; (iv) to entities owned by the Whistleblower or for which they have worked, as well as to entities that operate in the same working environment;
- ensure the traceability of the report evaluation process and the adoption of any subsequent measures.

It is expressly forbidden to:

- file reports that are manifestly opportunistic and/or filed for the sole purpose of damaging the reported individual or other individuals;

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- file reports which, from the outcome of the investigation phase, are found to have no factual confirmation and made in full awareness of the non-existence of a violation or non-compliance.

6. OPERATING MODES

6.1 Receipt of Reports

The Report can be made with the following alternative methods which are to be considered autonomous and independent of each other (“**Internal whistleblowing**”):

- in written or oral form via the Digital Platform accessible at <https://www.sinelec.it/whistleblowing/>
- by ordinary or registered mail, confidential and personal, addressed to the Recipient, to “Sinelec S.p.A.- Località Passalacqua 2/2. 15057 Tortona (AL)”
- in person, through a meeting with the Recipient.

The report can be made anonymously¹ or non anonymously.


The procedures for filing reports are made clear, visible and easily accessible to all Recipients, including those who do not attend the workplace, by publishing this Procedure on the Company’s website at <https://www.sinelec.it/wistleblowing/> and through specific instructions that can be consulted on the Digital Platform in the event of a Report filed through this channel.

Sinelec that receives a Report outside the aforesaid channels must send it without delay and, in any case, within seven days of its receipt, in its original format including any attachments, to the Recipient, giving simultaneous notice to the Whistleblower (only in the case of a non-anonymous Report), in compliance with criteria of maximum confidentiality and suitable for protecting the Whistleblower and the identity and integrity of the reported individuals, without prejudice to the effectiveness of subsequent verification activities.

For the sake of completeness, it should be noted that, when certain conditions are met, the Decree provides that the Report can be made (i) through an external channel set up and managed by the ANAC - National Anti-Corruption Authority (“**External whistleblowing**”), (ii) by public disclosure or (iii) by complaint to the judicial or accounting authority.

In particular, it should be noted that the Whistleblower can report to the ANAC only if: (i) the activation of the internal channel is not mandatory in their workplace or, if it is mandatory, it has not been activated; (ii) the Report was not

¹ The protection measures pursuant to art. 16 of the Decree apply if the Whistleblower is subsequently identified and has suffered retaliation, or if the Whistleblower has submitted reports to the competent institutions, bodies and agencies of the European Union, in compliance with the provisions of article 6 of the aforementioned Decree.

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followed up; (iii) they have reasonable grounds to believe that, if they were to file the Internal Report, this would not have been followed up or they would face retaliation; (iv) they have reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

6.1.1 Internal reporting via the Digital Platform

The Digital Platform is equipped with security measures and encryption tools to guarantee the confidentiality of the identity of the Whistleblower, of the individuals involved and in any case mentioned in the Report, as well as of the content of the same and of related documentation.

The Report can be made in writing or by voice message following the procedure indicated on the Digital Platform. When filing the Report, the Digital Platform automatically generates a “user id” and allows the Whistleblower to define a password. Using these credentials, the Whistleblower can always have access to the Report filed and check its status and outcome, as well as being able to speak with the Recipient even if they have decided to remain anonymous. If the voice messaging system is used for the Report, and prior consent of the Whistleblower, this is documented by the Recipient by its recording on a device suitable for storage and listening or by means of a complete transcription. In the event of a transcript, the Whistleblower can verify the content of the transcript, which will be made available on the Digital Platform.

6.1.2 Internal reporting through an in-person meeting with the Recipient

The Report is made through a direct in-person meeting with the Recipient set up by the latter within a reasonable time from the date of the Whistleblower’s request. In the event that the Recipient uses a voice recording system for the Report, the Report will be documented in writing by means of a detailed account of the conversation by the Recipient. The Whistleblower can verify, correct and confirm the content of the transcript by means of their signature.


6.2 Receipt and preliminary evaluation of the Report

Upon receipt of the Report, the Recipient issues the Whistleblower with acknowledgement of receipt of the Report within seven days of the date of receipt. Within three months from the date of the acknowledgement of receipt, the Recipient provides a reply to the Report.

If the Report is excessively general or incomplete, in the case of a non-anonymous Report, the Recipient may contact the Whistleblower to request further information useful for the preliminary assessment.

The Evaluation Team will analyse and classify the Report, in order to limit processing exclusively to reports falling within the scope of the Procedure.

Following this analysis, the Evaluation Team will prepare a summary indicating the type of Report, the date of receipt,

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the date of conclusion of the preliminary evaluation and the outcome of the latter (archiving or continuation of the analysis), with the relative motivation.

The reports are archived by the Evaluation Team: (i) generic and/or which do not constitute a “Detailed Report”; (ii) clearly unfounded; (iii) containing facts already subject to specific preliminary investigations in the past and already closed, where the preliminary checks carried out do not reveal new information such as to make further verification activities necessary; (iv) “verifiable circumstances” for which, in the light of the results of the preliminary checks, no elements emerge such as to support the start of the subsequent preliminary investigation phase; (v) “non-verifiable detailed reports” for which, in the light of the results of the preliminary checks, it is not possible, on the basis of the investigative tools available, to carry out further checks on the truthfulness and/or validity of the Report.

Both in the event that the Evaluation Team proceeds with the archiving of the Report, and in the event that the preliminary investigation is started, the Recipient will inform the Whistleblower (only in the case of a non-anonymous Report).

If the Report concerns a possible violation of Model 231 and/or the Group’s Code of Ethics, or relevant illegal conduct pursuant to Legislative Decree 231/01, the Recipient will inform the Supervisory Body of the start of the investigation.

6.3 Investigation


The investigation into the Report is aimed at proceeding, within the limits of the tools available to the Recipient, with specific ascertainties, analyses and assessments regarding the reasonable foundation of the reported facts, as well as reconstructing, on the basis of official documentation and information and of those made available, the management and decision-making processes followed. The merit of management decisions or opportunities, discretionary or technical-discretionary, made from time to time by the corporate structures/positions involved does not fall within the scope of analysis of the preliminary investigation, if not within the limits of manifest unreasonableness.

The Recipient will take care to carry out the preliminary investigation also by acquiring the necessary information elements from the structures involved, involving the competent corporate functions and making use of external consultants, if deemed appropriate.

Preliminary activities relating to reported facts on which the existence of ongoing investigations by public authorities is known (for example: judicial, ordinary and special authorities, administrative bodies and independent authorities, invested with supervisory and control functions) are subject to the preliminary assessment of the competent corporate functions, so that they verify the compatibility of the internal investigation with the investigation/inspection activities.

The preliminary activities are carried out resorting to, by means of example:

- company data/documentation useful for the purposes of the investigation (e.g. extractions from SAP company systems and/or other specific systems used);

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- external databases (e.g. info provider/databases on company information);
- open sources;
- documentary evidence acquired at the corporate structures;
- where appropriate, statements made by interested parties or acquired during interviews, recorded and signed.

The Recipient also has the right to carry out in-depth analyses directly, for example through hearings with the Whistleblower (if the Report was not made anonymously), with the individual reported and/or with other individuals mentioned in the Report as informed of the facts, as well as requesting from the aforementioned individuals the production of reports and/or documents.

At the conclusion of the investigation, the Evaluation Team will prepare a report (“**Final Report**”) detailing:

- the activities carried out, the related outcomes, as well as the outcomes of any previous investigations carried out on the same facts or on facts similar to those covered by the Report;
- a judgement as to whether or not the facts reported are reasonably founded with any indications regarding the adoption, by the competent management - which is informed of the outcome of the investigation - of the necessary corrective actions on the areas and company processes affected by the Report.

The Final Report is sent:

- to the Chief Executive Officer or, if the report concerns the latter, the Chairman of the Board of Directors;
- to the Supervisory Body and to the Board of Statutory Auditors;
- to the Anti-Corruption contact person if the report relates to corrupt actions, circumstances or behaviour.


6.4 Disciplinary Measures

6.4.1 Disciplinary measures against employees

Upon receipt of the Final Report, the Chief Executive Officer, as the Employer, decides whether to initiate disciplinary proceedings against the reported person deemed guilty of a breach or unlawful conduct and believed responsible as a result of the analysis and evaluation.

If the Whistleblower is jointly responsible for the facts in the report, they must receive preferential treatment compared to the other co-perpetrators, provided that such a course of action is in compliance with legislation, the applicable national collective bargaining agreement and the protections provided by the Workers’ Charter.

The Chief Executive Officer, as Employer, also evaluates, with the assistance of the Personnel Administration and Industrial Relations Department, whether to initiate disciplinary proceedings: (i) against the Whistleblower who has acted with verified and substantiated intent or gross negligence; (ii) against any individual who has engaged in retaliatory/discriminatory conduct against the Whistleblower; (iii) against individuals involved in the report evaluation and analysis process who have breached confidentiality obligations or have not examined the received report.

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The disciplinary proceedings adopted will be those governed by the applicable national collective bargaining agreement and imposed on the basis of the Workers' Charter, in accordance with the Company's disciplinary system.

In addition to the disciplinary sanctions, any attorney already granted to the employee may also be revoked.

6.4.2 Provisions against corporate bodies

If the breach or unlawful conduct concerns a member of the company bodies, the Board of Directors and/or the Board of Statutory Auditors, on the basis of their respective competences, the most appropriate and adequate measures shall be adopted depending on the seriousness of the breach and in compliance with the law and the company by-laws.

In the most serious cases, the Board of Directors, in consultation with the Board of Statutory Auditors, may propose to the shareholders' meeting that the director involved be removed from office. In the case of breach by the statutory auditors, the Board of Directors will propose to the shareholders' meeting that the auditor involved also be removed from office.

In case of breaches or unlawful conduct by a director who is also an employee of the Company, this will be done in each case unless different disciplinary actions are applicable based on the employment relationship.

6.4.3 Measures against third parties

In the case of breach or unlawful conduct by third parties with contractual links to the Company, the Company will consider the adoption of appropriate measures in accordance with the contract and/or the law.


6.4.4 Consequent and further measures

Once the Final Report has been received, the Chairman of the Board of Directors or the Chief Executive Officer can inform the judicial and/or supervisory authorities of the facts covered by the Report.

The Receiving Party may advise the Chief Executive to implement, in consultation with the departments concerned, any preventive measures deemed necessary to facilitate the promotion of a culture of legality and transparency within the Company and to promote the adoption of any amendments and additions to the Procedure herein and control systems in the light of a constant monitoring of its application of the results obtained.

6.5 Protection of the Whistleblower

Sinelec does not tolerate any retaliatory disciplinary consequences against the Whistleblower and the Facilitators, prohibiting the adoption of *“any behaviour, act or omission, even if only attempted or threatened, put in place as a result of the Report, the report to the judicial or accounting authority or the public disclosure, and which causes or may cause the Whistleblower unjust damage directly or indirectly”*.

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In the event of suspected discrimination or retaliation against the Whistleblower, in connection to the Report, or abuse of the reporting tool by the same, Sinelec may apply disciplinary sanctions.

By way of example, the following are considered retaliatory acts: (i) dismissal, suspension or equivalent measures; (ii) demotion or failure to promote; (iii) change of duties, change of place of work, reduction of salary, change of working hours; (iv) the suspension of training or any restriction of access to the same; (v) negative merit notes or negative references; (vi) the adoption of disciplinary measures or other sanctions, including financial ones; (vii) coercion, intimidation, harassment or ostracism; (viii) discrimination or otherwise favourable treatment; (ix) failure to convert a fixed-term employment contract into an open-ended employment contract, where the worker has a legitimate expectation of such conversion; (x) the non-renewal or early termination of a fixed-term employment contract.

Acts undertaken in violation of the prohibition of retaliation are null and void.

However, the protection referred to in this paragraph does not apply in cases where the Report contains false information made with wilful misconduct or gross negligence.

6.6 Protection of Confidentiality


The Company guarantees the confidentiality of the Whistleblower (in addition to what is already provided for in the previous paragraph), of the individual involved and of the subject in any case mentioned in the Report, as well as of the data/information transmitted, in order to guarantee the Whistleblower from any form of retaliation or discrimination.

The Company also guarantees the same protection to the individuals mentioned in the Report, to the Facilitators, to the persons who operate and who have a regular and current relationship with said person in the same working context as the Whistleblower and to those who are linked to the latter by a stable bond affective or kinship within the fourth degree and operate in the same working context as the Whistleblower.

The identity, as well as any other information from which the identity of the Whistleblower can be inferred, directly or indirectly, cannot be disclosed, without the express consent of the same, to persons other than the Recipient and those competent to receive or follow up on the Reports, expressly authorised to process such data pursuant to articles 29 and 32, paragraph 4, of regulation (EU) 2016/679 and article 2-quaterdecies of the personal data protection code referred to in the legislative decree of 30 June 2003, no. 196.

As part of the disciplinary procedure, the identity of the Whistleblower cannot be disclosed, where the objection of the disciplinary charge is based on separate and additional assessments with respect to the Report, even if consequent to the same. If the dispute is founded, in whole or in part, and knowledge of the identity of the Whistleblower is essential for the defence of the accused, the Report will be usable for the purposes of the disciplinary procedure only in the presence of the Whistleblower's express consent to the disclosure of their identity.

Written notice is given to the Whistleblower of the reasons for the disclosure of confidential data, in the above

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hypothesis, when the disclosure of their identity and of the information on the violations is indispensable also for the purposes of defence of the individual involved.

All individuals involved in this Procedure are required to maintain such confidentiality or anonymity of the Whistleblower and of the aforementioned subjects, with the following exceptions: (i) the Whistleblower is the subject of a libel or defamation action under the Criminal Code; (ii) the Whistleblower commits an act that constitutes tort, under Article 2043 of the Italian Civil Code.

6.7 Processing of personal data

The processing of personal data in the context of the Reports will take place pursuant to Regulation (EU) 2016/679 relating to the protection of personal data of natural persons (GDPR), as well as any other applicable laws and/or regulations to the extent compatible with the GDPR itself and the specific information available on the Digital Platform or on the www.sinelec.it website at <https://www.sinelec.it/it/privacy/>, which is intended to be referred to in its entirety in this document.

As part of the management of the reports, the Whistleblower's personal data will be processed, where the Report is by name, as well as personal data of the reported individual, such as name, surname, position held, etc. and personal data of any third parties, as well as any further information collected in the context of the investigations that is necessary and adequate to ascertain and verify the validity or otherwise of the Report.

Interested parties may exercise, if required by the applicable provisions of the law and subject to the limitations pursuant to art. 2-undecies of Legislative Decree 196/2003, the rights provided for by the GDPR by sending a communication by e-mail to the address indicated below: privacy@sinelec.it.

7. STORAGE OF THE DOCUMENTATION

All reports, regardless of the method of receipt, are archived by the Recipient in a specific electronic archive which constitutes the summary database of the essential data of the reports and their management and also ensures the archiving of all attached documentation, as well as than that produced or acquired during the analysis activities.

Reports and related documentation are kept for the time necessary to process the Report and, in any case, no later than five years from the date of communication of the final outcome of the Report procedure.