Whistleblowing Organizational Procedure

1. Background

Legislative Decree No. 24 of March 10, 2023 (hereinafter "Decree"), implementing EU Directive 2019/1937, introduced provisions into the Italian legal system for the protection of persons who report breaches (internally or externally), make public disclosures, or report violations to the Judicial Authority. This aims to guarantee the confidentiality of the reporting person's identity, as well as the identity of any involved or mentioned person, alongside the content of the report and related documentation (so-called whistleblowing).

Having stated the above, this Organizational Procedure implements the provisions of the Decree and establishes the channels through which company employees and collaborators can report violations they have become aware of within their work-related context.

2. Persons Eligible to Submit Reports

The following natural persons are eligible to submit whistleblowing reports:

- subordinate workers;
- self-employed workers performing their activities at the company;
- freelancers and consultants providing their services at the company;
- volunteers and trainees, paid or unpaid, working at the company;
- shareholders;
- persons with administrative, management, control, supervisory, or representative functions, even if exercised on a de facto basis;

who have acquired knowledge of violations in a work-related context.

Likewise, all persons who are even temporarily in a work relationship with the company are eligible, including employees during probation periods and those whose legal relationship has not yet started or has ceased.

3. Persons Benefiting from Protection Measures Provided by the Decree

In addition to reporting persons, denouncers, or those making public disclosures, protection under the Decree is also extended to individuals who might face retaliatory measures (directly or

indirectly) due to their role in the reporting process or their specific relationship with the reporting person. These include:

- the facilitator, defined as a natural person assisting the reporting person in the reporting process, operating within the same work context, and whose assistance must remain confidential;
- persons in the same work context as the reporting person, denouncer, or public discloser, connected to them by a stable emotional bond or kinship up to the fourth degree;
- work colleagues of the reporting person or denouncer who work in the same work context and maintain a regular and current relationship with them;
- entities owned by the reporting person, or for which they work, as well as entities operating in the same work context as said persons.

4. Objective Scope of Eligible Reports

Reports, public disclosures, or complaints may concern information, including reasonable suspicions, regarding violations committed or likely to be committed based on concrete elements within the organization with which the reporting person maintains a qualified legal relationship, as well as actions aimed at concealing such violations.

Violations, defined as "conduct, acts, or omissions that harm the public interest or the integrity of the public administration or private entity" subject to reporting (Article 2, paragraph 1, letter a, numbers 3, 4, 5, and 6) consist of:

- offences falling within the scope of EU or national acts specified in the Decree annex or EU Directive 2019/1937 annex, concerning public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety and compliance, transport safety, environmental protection, radiation protection and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, privacy protection, and network and information security;
- acts or omissions affecting the financial interests of the EU;
- acts or omissions relating to the internal market;
- acts or conduct that defeat the object or purpose of EU provisions in the sectors covered by the Decree.

The following cannot be subject to reporting under the protection measures of the Decree:

- grievances, claims, or requests tied to personal interest that pertain exclusively to individual employment relationships or relations with hierarchical superiors;
- violations already mandatorily regulated by EU or national acts specified in Part II of the Decree annex;
- violations concerning national security, or defense/security procurement, unless covered by relevant EU derivative law.

5. Prerequisites for Internal Reporting and Admissibility Conditions

Protection measures apply provided that the reporting person, at the time of reporting, had reasonable grounds to believe that the information on the reported violations was true and fell within the objective scope described in Section 4.

For a report to be admissible as a whistleblowing report, the following essential elements must be clear:

- identifying details of the reporting person (first name, surname, place and date of birth) and a contact address/email for updates;
- time and place circumstances of the event, and a clear description of the facts, specifying contextual details and, where applicable, how knowledge of the facts was gained;
- identifying details or elements allowing identification of the person to whom the facts are attributed.

Furthermore, it is recommended that:

- the reporting person explicitly states the intention to benefit from Decree protections, adding on the envelope the phrase "riservata al gestore whistleblowing" (confidential to the whistleblowing manager);
- supporting documents proving the validity of the facts are attached;
- other persons aware of the facts and entitled to protection are indicated, along with justification.

6. Internal Whistleblowing Manager

The impartial and independent entity appointed within Fonderie Palmieri S.p.A. to receive and manage whistleblowing reports is the **Head of Internal Audit**.

In cases of potential conflict of interest—where the manager coincides with the reporter, reported person, or is otherwise involved—the report must be addressed to the President of the company, marking the envelope: "whistleblowing - riservata al Presidente".

7. Internal Reporting Procedures

Eligible individuals wishing to report violations can send a registered letter addressed to:

> Fonderie Palmieri S.p.A.
> Via Baldanzese, 8
> 50041 - Calenzano (FI) - Italy
> Marked on envelope: "riservata al gestore whistleblowing"

The outer envelope must contain two closed inner envelopes: the first with the reporter's identity details and ID copy; the second containing the report itself, ensuring strict separation between personal data and report details.

Alternatively, oral reports can be made via direct telephone at **+39 055 88326241**, where a direct meeting can also be requested (indicatively arranged within 10 days).

8. Report Management Activities

Upon receiving a written report via registered post, the manager archives the file in a dedicated locked cabinet inside a room protected by an alarm system, accessible only to the manager.

For oral reports (phone or in person), the manager prepares a detailed transcript. Once verified and signed by the reporter, a copy is delivered to the reporting person.

Within 7 days of receipt, an acknowledgment of receipt is issued to the reporter.

Anonymous reports must also be recorded, as anonymous reporters who are subsequently identified and suffer retaliation are entitled to full legal protections.

If an internal report is submitted to an unauthorized person, it must be forwarded within 7 days to the competent manager without keeping copies, informing the reporter simultaneously.

After issuing the acknowledgment, the manager conducts a preliminary evaluation regarding admissibility and procedibility. Inadmissibility may occur due to missing essential data, manifest groundlessness, overly generic statements, or submitting documents without describing specific violations. Ineligible reports are archived with traceable justifications.

If admissible, an internal investigation is launched. The manager may collect documentation, involve internal functions, or hire external specialized consultants (subject to strict anonymization and data masking).

Upon concluding the investigation, the report is either archived as unfounded or declared substantiated, referring the matter to competent internal bodies.

Within 3 months from the acknowledgment date (or 3 months from the 7-day acknowledgment deadline), feedback (final or status update) is provided to the reporter.

9. External Reporting Prerequisites

Reports may be submitted to the National Anti-Corruption Authority (ANAC) if internal channels are inactive/non-compliant, internal reports went unheeded, there is a risk of retaliation, or an imminent/manifest public interest danger exists (via www.anticorruzione.it).

10. Protections Granted to Reporters and Assimilated Subjects

The Decree ensures confidentiality, protection against retaliatory acts (defined under Art. 17, para 4 of the Decree), and limitations of liability (Art. 20 of the Decree). Suspected retaliations can be communicated exclusively to ANAC.

11. Processing of Personal Data

Personal data processing complies with EU Regulation 2016/679 (GDPR) and Legislative Decree 196/2003. Data Controller is Fonderie Palmieri S.p.A. The Whistleblowing Manager acts as an authorized person.

12. Data Retention

Reports and documentation are retained for the time necessary to process them, up to a maximum of five years from the final outcome communication date.

13. Publication

This procedure is displayed on company premises and published in a dedicated section at www.fonderiepalmieri.it.