

Following the entry into force of Legislative Decree 24/2023 on whistleblowing, **Dieffebi S.p.A.** has established several reporting channels for the case that any unlawful conduct is committed. **Dieffebi S.p.A.** encourages an open business culture, based on ethics, transparency and accountability and inspired by the values that drive us: trust, integrity, courage, passion and inclusion.

For this reason, **Dieffebi S.p.A.** has established internal channels to report any conducts, whether consisting of actions or omissions, that are unlawful insofar as they are in breach of laws and regulations, of the Code of Ethics and of Conduct, of the 231 Organisational Model, as well as of the system of rules and procedures in force in the company.

Please note that commercial complaints as well as disputes or requests relating to interests of personal nature are not included in the above legislation.

By reporting non-conforming behaviour, you allow the company to identify possible anomalies and promptly adopt appropriate remedial actions, thus avoiding financial or reputational damage.

Who can report?

Reports can be sent by: employees, freelancers, independent contractors, trainees, volunteers, shareholders who own participation interests in the company or individuals holding, even *de facto*, offices of management, direction, control, supervision or representation at the company and who intend to report offences they have learnt about by reason of their employment relationship. Reports must be suitably detailed, that is, they must include sufficient information to verify the reported facts (for instance, elements that allow identifying the persons involved, the background, place and time period of the reported facts and supporting documents).

How to report

You may transmit a report through:

- online platform at the following link: <https://dieffebi.signaletic.it>. Once the insertion is completed, the Signaletic platform provides a code that allows verifying the processing status and sending and receiving communications (even anonymously);
- phone contact at **+39 0444 419325**;
- direct contact with the managers to arrange a personal meeting.

How reports are managed

Reports are received by the managers appointed by the company for the relevant investigation.

Within 7 days of receiving the report, a notice of receipt will be sent and within 3 months of such notice, an update will be provided on the follow-up given to the report.

Guarantee of data protection and confidentiality

Legislative Decree 24 of 10 March 2023 has introduced a uniform regulation of the reporting channels and of the protection measures for whistleblowers in both the public and the private sector.

Strict confidentiality is ensured to the whistleblower, the facilitator and the persons involved in the report. In the case of anonymous reports, it will not be possible to trace the identity of the whistleblower.

No retaliation of any kind, personal or professional, will be permitted or tolerated by reason of the report made. If you believe you have suffered retaliation as a consequence of the report, you can notify the Italian Anti-corruption Authority (ANAC) through the platform you will find on the ANAC website.

All personal data processing shall be carried out in compliance with the data protection legislation.

To learn more, please see the privacy policy at <https://dieffebi.signaletic.it>

The managers of Dieffebi S.p.A. are:

DOCUVERSE S.RL. (external manager)

Tel. +39 0444 419325

A few tips to protect the anonymity/confidentiality of your report

Signaletic has been designed in accordance with the principles of privacy and security by design and by default, meaning that the requirements of the GDPR are built in when developing the software and by default, right from the design stage. Traffic towards the Signaletic portal is encrypted in transit, whereas data stored in the platform are encrypted at rest.

Below you will find a few tips to protect your reports; make sure to implement them for better computer security and to protect the anonymity/confidentiality of your report:

- use private devices under your control to submit reports and view reports you have already submitted;
- if possible, use an incognito browsing window;
- store your credentials in secure places where there is no risk to share them with anyone;
- make sure not to submit reports or access the Signaletic portal in public or in places where others can see what you are doing on your screen;

- access the Signalethic portal only from a secure internet connection and a private network so as to protect your Internet traffic before reaching the platform.

Reports to the Italian Anti-Corruption Authority (ANAC) through an external channel.

If, after submitting your report, you do not receive a notice of receipt and/or an update on the follow-up given to the report, or if you have valid reasons (based on specific circumstances and information that can actually be acquired) to believe that no effective follow-up would be given to an internal report, or that the report could determine retaliation, or that the breach can result in an imminent or clear danger for the public interest, you can transmit a report to ANAC through the dedicated platform on the Authority's website.

On the ANAC website you can also find the list of the Not-for-Profit Entities that provide whistleblowers with support (information, assistance and free-of-charge advice on how to report and on how to protect from retaliation).