

Acciaierie d'Italia S.p.A.



WHISTLEBLOWING PROCEDURE

This document is a courtesy translation. The Italian version shall prevail.

Issue

First Issue

Written by

Compliance Director

Validated by

Group Quality Director

Information Systems Director

Human Resources Director

Legal Affairs Director

Operations General Support Director

Approved by

Compliance Director

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1. PURPOSE AND SCOPE OF APPLICATION

The purpose of this Procedure is to describe and regulate the Reporting System implemented by Acciaierie d'Italia S.p.A. (hereinafter also referred to as "**Acciaierie d'Italia**" or the "**Company**"), providing appropriate indications to whistleblowers for making a report and outlining the relevant management process.

In particular, this document:

- i. defines the scope of the Reporting System;
- ii. identifies the persons who may report;
- iii. circumscribes the scope of the conduct, events or actions that can be reported;
- iv. identifies the channels through which reports may be made;
- v. identifies and prescribes the general principles and rules governing the reporting process, including safeguards for the reporting party and the reported person, as well as the consequences of any abuses in the use of the established channels;
- vi. defines the reporting management process in its various stages, identifying roles, responsibilities, and operating procedures.

The document also goes on to illustrate the so-called external reporting channels established by the National Authority for Anticorruption – ANAC and the possibility of so-called public disclosure, as well as the related prerequisites, and limits, of access, pursuant to and for the purposes of Articles 6 and 15 of Legislative Decree no. 24 of 10 March 2023, on "*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*" (hereinafter the "**Decree**").

The Whistleblowing Procedure applies to the persons concerned in their capacity as Whistleblowers and reported persons, as defined below, as well as to the company figures and functions identified by the Company and involved in the management of the Reports of Violations received.

This Procedure applies to Acciaierie d'Italia S.p.A..

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2. BACKGROUND AND OBJECTIVE OF THE DOCUMENT

2.1. Objective of the Document

The Decree No. 24/2023 significantly extended the scope of application of the rules on Whistleblowing, which were previously limited, for the private sector, only to entities with an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001.

In particular, the Decree identifies and regulates the Whistleblowers, the subject matter of violation reports, the channels to be established and provided for, the obligations and protections that companies are required to implement and ensure, and also defines the criteria and timeframes for compliance.

As the handling of reports involves the collection and processing of personal data, the relevant data protection legislation applies. This legislation includes Regulation 2016/679 of the European Parliament and of the Council, dated 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter "**GDPR**") and Legislative Decree No. 196 of 30 June 2003, together with Legislative Decree No. 101 of 10 August 2018 (hereinafter jointly referred to as the "**Privacy Code**").

Acciaierie d'Italia had already implemented a system for making and managing reports of violations, and considering the regulatory changes outlined above, it revised its logic and tools.

It should be noted that, in setting up this reporting system, the Company has also taken into due consideration the provisions of the "Guidelines on the protection of persons who report violations of Union law and the protection of persons who report violations of national laws" approved by ANAC with Resolution No. 311 of 12 July 2023.

The Company also intends to make this reporting system available to allow reports of violations of the Code of Conduct against violence and harassment in the workplace of Acciaierie d'Italia S.p.A., to which reference is made in full.

This Procedure constitutes the reference for Acciaierie d'Italia S.p.A. and the principles defined in it do not prejudice or limit in any way the obligations of reporting to the competent Judicial Authorities (as also referred to in the Decree itself), Supervisory Authorities or regulatory authorities.

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2.2. References

- Code of Business Conduct of Acciaierie d'Italia S.p.A.
- Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 of Acciaierie d'Italia S.p.A. ("Model 231")
- Code of Conduct Against Violence and Harassment in the Workplace of Acciaierie d'Italia S.p.A.
- Acciaierie d'Italia S.p.A. Anti-Corruption Code
- Acciaierie d'Italia S.p.A. Antitrust Code of Conduct
- Personal Data Protection Code of Acciaierie d'Italia S.p.A.
- Data Retention Policy of Acciaierie d'Italia S.p.A.
- Antifraud Policy of Acciaierie d'Italia S.p.A.
- Procedure for the Management of Conflict of Interest of Acciaierie d'Italia S.p.A.

This Procedure replaces the Whistleblowing Policy of Acciaierie d'Italia S.p.A. starting from the date of issue.

3. GLOSSARY

The following are the main definitions aimed at facilitating a better understanding of this procedure.

Work context: present or past working or professional activities, carried out within the scope of relationships referred to in Article 3(3) or (4) of the Decree, through which, regardless of the nature of such activities, a person acquires information on the violations, and within which he or she may risk suffering retaliation in case of reporting or public disclosure or complaint to the judicial or accounting authority.

Reporting Manager: the reporting manager, pursuant to Article 4 of Legislative Decree of 24 March 2023, must be *“a dedicated autonomous internal person or office with specifically trained staff (...) or an external person, also autonomous and with specifically trained staff”*. This person may also involve other corporate functions, provided that the confidentiality of the identity of the Whistleblower is always guaranteed and that they are expressly authorised to process data pursuant to the GDPR.

In Acciaierie d'Italia S.p.A., this person is identified as in Section 6 ‘*Process for the Handling of Reports Received by Internal Channels*’ of this Procedure.

Report: written or oral communication made by the Whistleblower informing on Violations, through one of the reporting channels provided. The Report must have the minimum form

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and content provided for in Section 4.2.2 *'Form and Minimum Content of Reporting by Internal Channels'*.

Whistleblower or Reporting Person: the natural person making the Report as better defined in Section 4.1 *'Reporting Persons'*.

Reported Subject or Reported Person: the natural or legal person mentioned in the Report as the person to whom the breach is attributed or who is otherwise involved in that breach.

Violation: the Violation consists of conduct, acts or omissions, detrimental to the integrity of the Company, of which the Whistleblower has become aware in the context of his or her work and which are ascribable to the matters outlined in Section 4.2. *'Subject of the Report – Violations'*.

4. ROLES AND RESPONSIBILITIES

4.1 Reporting Persons

The Reporting Parties to whom this Procedure is addressed are all persons employed by the Company with an employment contract, whether permanent or fixed-term, full-time or part-time, including intermittent employment, apprenticeship, ancillary employment, or by means of a labour supply contract, as well as occasional workers pursuant to Article 54-bis of Legislative Decree no. 50 of 24 April 2017; all self-employed workers pursuant to Article 2222 of the Civil Code and Chapter I of Law 22 May 2017, no. 81; coordinated and continuous collaborators pursuant to Article 409, no. 3, of the Code of Civil Procedure; interns, volunteers and trainees at the Company; persons with functions of administration, management, control, supervision and representation (including de facto) of the Company, shareholders, as well as workers or collaborators of entities that supply goods or services or perform works in favour of third parties, freelance professionals and consultants, who perform their activities at the Company.

Whistleblowers may also include persons: (i) whose legal relationship with the Company has not yet started, if information on breaches was acquired during the selection process or in other pre-contractual stages; (ii) during the trial period; (iii) after termination of the relationship, if information on breaches was acquired during the course of the relationship.

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4.2 Subject of the Report – Violations

Whistleblowers are required to report breaches consisting of conduct, acts or omissions, which damage the integrity of the Company, of which the Whistleblower has become aware in the context of his or her own Work Context and which relate to:

- i. unlawful conduct relevant under Legislative Decree 8 June 231/2001 and violations of Model 231;
- ii. offences falling within the scope of the European or national legislation set out in the Annex to the Decree or the internal legislation implementing the European Union acts set out in the Annex to Directive (EU) 2019/1937 (although not included in the Annex to the Decree), relating to the following sectors: public procurement; services, products and financial markets and prevention of money laundering and financing of terrorism; 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; privacy and personal data protection and security of networks and information systems;
- iii. acts or omissions detrimental to the financial interests of the European Union (by way of example, fraud, corruption and any other illegal activity relating to European Union expenditure);
- iv. acts or omissions affecting the internal market (by way of example: violations on competition and state aid matters);
- v. acts or conduct that nullify the object or purpose of the provisions of European Union acts.

The Report must relate to:

- Violations committed or that may have been committed, on the basis of well-founded and circumstantiated suspicions;
- Violations not yet committed but which the Whistleblower believes may have been committed, on the basis of well-founded and circumstantiated suspicions;
- Conduct aimed at concealing the Violations indicated above.

The following are **excluded**:

- objections, claims or requests linked to a personal interest of the Whistleblower that relate exclusively to his/her individual work relationships, or regarding his/her work relationships with hierarchically superior figures;
- reports concerning defence and national security;

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- reports concerning violations already regulated in certain special sectors (financial services; prevention of money laundering and terrorist financing; transport safety; environmental protection).

Information on reportable violations also does not include information that is clearly unsubstantiated, information that is already fully in the public domain, as well as information acquired only on the basis of indiscretions or rumours that are not very reliable.

4.2.1 Actions, Facts and Conducts that may be Reported

In order to facilitate the identification of facts that may be the subject of Reports, the following is a list, purely by way of example and not exhaustive, of relevant conduct/behaviour:

- promise or giving of a sum of money or the granting of other benefits (gifts, hospitality, lunches, dinners, etc., which are not permitted under company procedures) to a public official or a person in charge of a public service as consideration for the performance of their duties or for the performance of an act contrary to their official duties (e.g. facilitation of a case);
- tampering of documents through the manipulation or falsification of company records or official documents, in order to obtain an unlawful advantage or to deceive the competent authorities;
- conduct aimed at obstructing the control activities of the Supervisory Authorities (e.g. omission of delivery of documents, submission of false or misleading information);
- the promise or giving of a sum of money or the granting of other benefits (gifts of non-modest value, hospitality, lunches, dinners, etc., not allowed under company procedures) aimed at bribing suppliers or customers;
- agreements with suppliers or consultants to make non-existing services appear to have been performed;
- violation of personal data protection by collecting, storing or processing customers' personal data without their explicit consent or without taking appropriate security measures to protect such data against unauthorised access or violation;
- implementation of an IT system to circumvent European standards on the protection of personal data and the security of networks and information systems of data collected without the explicit consent of the data controllers and transfer of such data to third countries that do not guarantee an adequate level of data protection.

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4.2.2 Form and Minimum Content of Reporting by Internal Channels

It is necessary for the Report to be as detailed as possible and to provide as many elements as possible to allow for its proper handling and follow-up.

To this end, the Report should contain the following essential elements:

- a. **subject matter:** a clear description of the breach that is the subject of the Report, with an indication of the circumstances of time and place in which the facts/behaviour described were committed;
- b. **Reported Person and other persons involved:** any element (such as the function/role of the company) enabling easy identification of the alleged perpetrator(s) of the reported Violation or of any other persons involved.

In addition, the reporter may indicate/provide the following further elements:

- his/her **personal details**;
- **any documentation** that may confirm the grounds of the Breach or better substantiate it;
- **any other information** that may facilitate the gathering of evidence on what has been reported.

Please note that the Report must NOT take an insulting tone or contain personal insults. The use of such expressions may be submitted by the Reporting Manager to the competent corporate functions for appropriate assessment, including disciplinary measures.

Please note that the Company also accepts Anonymous Reports (i.e. Reports from which it is not possible to determine the identity of the Whistleblower), provided that they contain the essential elements referred to in points a) and b) above.

5. INTERNAL REPORTING CHANNELS

Acciaierie d'Italia has established the following Internal Reporting Channels that allow for written or oral reports:

5.1 Written Reporting via the EQS Integrity Line Platform

The Company has adopted, as a preferred channel for the management of Reports, a special platform, called the EQS Integrity Line (hereinafter also referred to as the '**WB Platform**'), made available to it by a specialised service provider.

The WB platform is structured to ensure that:

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- during the reporting process, the information acquired respects the principles of personal data protection and maximum confidentiality. This is achieved through the adoption of encryption techniques and the implementation of technical-organisational security measures defined, assessed and implemented also in the light of an impact assessment pursuant to Article 35 of the GDPR, carried out prior to the processing;
- only the Reporting Manager and the persons involved in the management of the Report authorised by the Company to process personal data have access to the relevant information;
- is continuously available 24 hours a day, 7 days a week.

You can access the WB Platform directly by typing or copying the following address into an Internet browser: <https://acciaierieditalia.integrityline.com/>.

When you access the WB platform, you will find all the instructions you need to send a Report, including an anonymous one.

Before sending a Report, the WB Platform asks you to create a password and provides you with a Report Number ("**Case ID**"). These access credentials allow you to check the status of the Report, obtain information on the outcome and, if desired, also communicate anonymously with the Reporting Manager.

The Reporting Manager accesses the WB Platform to consult all the Reports received and carry out verification activities.

5.2 Oral Reporting via the EQS Integrity Line Platform

The WB Platform also provides for the possibility of recording a voice message. In this case, simply go to the 'Send a Report' page and use the Tab available in the top right-hand corner, filling in the mandatory fields by simply referring to the content of the voice message. To further protect the confidentiality of the Whistleblower, the WB Platform will automatically edit the voice message, making it unrecognisable.

The Report, subject to the Whistleblower's consent to be expressed by ticking the appropriate box on the "Send a Report" page, is documented by the Reporting Manager by means of a full transcript. In the case of transcription, the Whistleblower may, using the access credentials provided by the WB Platform, verify, rectify or confirm the content of the transcript, which will be made available by the Reporting Manager for this purpose.

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5.3 Reporting via Direct Meetings requested through the EQS Integrity Line Platform

A Report can be made by requesting a direct meeting with the Reporting Manager, again via the WB Platform. For this purpose, there a box to be ticked is provided on the 'Send Report' page.

This meeting will be organised by the Reporting Manager within a reasonable timeframe, using the communication channel offered by the WB Platform. To this end, using his or her credentials, the Whistleblower must log in to the WB Platform to view and reply to the communications received.

In this case, with the consent of the Reporting Person, the Report is documented by the Reporting Manager, either by means of a recording on a device suitable for storage and listening, or by means of minutes. In the case of minutes, the Reporting Person may verify, rectify and confirm the minutes of the meeting by signing them.

5.4 Reporting by Paper Mail

The Report may be made in writing by letter, to the following address: Acciaierie d'Italia S.p.A. - Viale Certosa, n. 239 - Milan, for the attention of the Reporting Manager (as referred to in Section 6 of this Procedure), using two sealed envelopes, the first with the Reporting Person's identification data together with a photocopy of the identification document (if a non-anonymous Report is intended); the second with the Report (so as to separate the Reporting Person's identification data from the Report). Both envelopes should then be placed in a third sealed envelope marked 'confidential' to the Reporting Manager (as referred to in Section 6 of this Procedure). This Report will then be entered in the WB Platform referred to in Section 6.1. "*Receipt and Filing of Reports*".

6. PROCESS FOR THE HANDLING OF REPORTS RECEIVED BY INTERNAL CHANNELS

Acciaierie d'Italia, pursuant to Article 4 of the Decree, identified the "**Internal Audit Department**" as the **Reporting Manager**, i.e. the subject expressly authorised to process the data referred to in this process pursuant to Articles 29 and 32 of the GDPR and Article 2-quaterdecies of the Privacy Code.

It is envisaged that authorisations to process personal data will be issued by the Reporting Manager to all persons involved in the management of the Report, including persons other than the Manager, according to the investigation needs of the case.

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Such persons have received adequate and specific professional training also on personal data protection and security.

The Internal Reporting Channels ensure, through organisational measures (by means of precise instructions formalised in the appointments/authorisations, as provided for in paragraph 8) and technical measures (also by means of encryption tools), the protection of personal data and confidentiality:

- (i) of the identity of the Whistleblower and the Reported Person;
- (ii) the content of the Report
- (iii) the documentation relating to the Report.

The Reporting Manager:

- will give diligent notice of receipt and diligent follow-up to the Report;
- will take steps to verify the completeness and substantiation of the information;
- will liaise with the Whistleblower and may request, if necessary, additions or further discussions and investigations;
- may interface with other corporate functions and figures to request their cooperation for a better investigation and analysis of the Report, in full compliance with the confidentiality guarantees set out in the Decree and in this Procedure;
- may carry out investigations also with the involvement of external consultants, in absolute compliance with the confidentiality guarantees set out in the Decree and in this Procedure.

Should the Reporting Manager have a conflict of interest with respect to a specific Report (as, for instance, he is the Reported Person or is wishing to qualify as a Whistleblower), one of the conditions for access to the External Reporting Channels to ANAC (referred to in Section 9.1) is deemed to be met, since it cannot be ensured that the Report is effectively followed up.

In cases where the Report relates to Breaches attributable to unlawful conduct relevant under Legislative Decree 8 June 231/2001 and/or violations of the 231 Model (referred to in point i) paragraph 4.2. "Subject of the Report – Violations") and does not concern Breaches attributable to the Supervisory Body itself, to one of its members or to the Secretary (Head of the Compliance Department), the Reporting Manager shall promptly inform the Supervisory Body pursuant to Legislative Decree No. 231/2001 through the Secretary, with information flows that must also cover all the subsequent stages of the follow-up to the Report.

The process of handling Reports is outlined below, with reference to the following phases:

- receipt and filing of the Report;

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- preliminary assessment and classification of the Report;
- internal checks and investigations;
- reply to the Report;
- conclusion of the process;
- reporting to Top Management;
- storage of Reports and related documentation.

If the Report is submitted to a subject other than the Reporting Manager and qualified as a Report with regard to this Procedure by the Reporting Person, or if the willingness to benefit from the protections is inferred by conclusive behaviour, such subject shall transmit it to the Reporting Manager, within 7 (seven) days from its receipt, giving at the same time written notice of the transmission to the Reporting Person.

Otherwise, if the Reporting Person does not expressly state that he/she wishes to benefit from the protection, or if this intention cannot be inferred from the report, the report is considered as an ordinary report, not covered by this Procedure.

6.1 Receipt and Filing of Reports

When the Report is received through the Internal Channels, the Reporting Manager will send a notice of receipt to the Reporting Person within 7 (seven) days from the date of receipt of the Report. This principle does not apply in the case of anonymous Reports sent by paper.

Please note that this notice of receipt does not constitute confirmation of the acceptability of the Report.

Upon receipt of a Report through a different channel than the WB Platform, the Reporting Manager will enter the Report in the WB Platform, which will assign a progressive identification number allowing it to be uniquely identified.

The WB Platform also acts as a Register of Reports and contains at least the following fields, which are updated in line with the outcome of the activities referred to in the following phases of the process outlined in this Procedure:

- Id/protocol ID;
- date of receipt;
- channel through which the Report was received;
- classification of the Report, according to the results of the assessment phase referred to in paragraph 6.2 " Report Preliminary Evaluation and Classification";
- starting date of the investigation (if any);
- conclusion.

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6.2 Report Preliminary Evaluation and Classification

The Reporting Manager promptly takes charge and carries out a preliminary analysis of the Report received.

If necessary, and where the reporting modalities permit, the Reporting Manager may request further information or supporting documentation from the Whistleblower, in order to allow a more exhaustive and conclusive assessment of the Report, again through the dedicated channels.

Following such preliminary analysis and assessment, the Reporting Manager classifies the Report into one of the following categories, which will entail a different and specific workflow for the management of the Report itself:

- a) Non-relevant Reports: Reports that do not fall within acceptable Violations as set out in this Procedure or that are made by persons who are not included in the Reporting Persons, other than those falling under point d) below;
- b) Unprocessable Report: at the end of the examination phase and/or following a possible request for further information, it was not possible to gather sufficient information to be able to proceed with further investigations;
- c) Relevant and processable Reports: in the event of Reports that are confirmed as sufficiently circumstantial and relevant within the scope of this Procedure, the Reporting Manager initiates the verification and investigation phase, described in the following paragraph;
- d) Not relevant but processable Reports: Reports that do not relate to acceptable Violations as set out in this Procedure or that are made by persons not included in the scope of Reporting Persons but that are sufficiently circumstantial to deserve further investigation. In such cases, the Reporting Manager shall in any case proceed with the appropriate checks, involving, where necessary, the other corporate functions deemed competent.

6.3 Internal Checks and Investigations

At the end of the preliminary assessment phase, where the Report received has been classified as 'relevant and processable' or 'not relevant but processable', the Reporting Manager will start internal checks and investigations to gather further detailed information and verify the validity of the reported facts.

The Reporting Manager reserves the right to request further information or documentation from the Reporting Person, as well as to involve him/her in the investigation phase and provide him/her with any information on the start and progress of the investigation.

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The Reported Person may be heard (or is heard at his/her request) in the Report management process, also through the acquisition of written comments and documents.

As part of the investigation activity, the Reporting Manager may avail himself/herself of the support of suitably qualified corporate structures/departments (also by acquiring deeds and documents) and/or of external consultants (providing the necessary guarantees of confidentiality and protection); the verification activities will also be carried out in compliance with the legislation on the protection of personal data.

In any case, the verification activities will also be carried out in compliance with and within the limits of the legislation on the protection of personal data, as well as the legislation on remote controls pursuant to Article 4 of Law 300/1970 et seq. (the so-called Workers' Statute) and the prohibition on the investigation of workers' opinions, and pursuant to Article 8 of Law 300/1970 and Article 10 of Legislative Decree 276/2003.

6.4 Reply to the Report

Within 3 (three) months from the date of notice of receipt or, in the absence of such a notice, within 3 (three) months from the expiry of the 7 (seven) day period from the submission of the Report, the Reporting Manager shall reply to the Whistleblower, if identifiable, by WB platform or other appropriate means on the follow-up that has been given or is intended to be given to the Report.

Such reply may consist, for instance, in the communication of the dismissal, in the opening of an internal investigation and, where appropriate, the results thereof, in the measures taken to deal with the matter raised, in the referral to a competent authority for further investigation; the same reply may also be merely interlocutory, since it may consist in the communication of information on all the activities described above that are intended to be undertaken and on the progress of the investigation. In the latter case, once the preliminary investigation is completed, the outcome of the investigation should also be communicated to the Reporting Person.

6.5 Conclusion of the Process

At the end of the analysis phase, the Reporting Manager shall draw up a written report containing:

- a) the descriptive elements of the Violation (e.g. place and date of occurrence, evidence and documents);
- b) the checks carried out, their outcome and the persons involved, either part of the Company or third parties involved in the analysis phase;

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- c) a summary evaluation of the analysis process with an indication of the facts ascertained and the relevant root causes;
- d) the outcome and conclusion of the analysis.

As a result of the above verification and investigation activities, the Reporting Manager:

- (i) where he/she finds elements substantiating the contents of the Report, he/she shall refer the matter to the competent corporate functions (also sharing the report prepared) so that they may identify and take the consequent initiatives (including disciplinary and/or judicial ones), which are their exclusive responsibility;
- (ii) where, on the other hand, he/she finds elements of manifest groundlessness of the Report, he/she orders its closing with adequate justification;
- (iii) where, finally, he/she finds elements of wilful misconduct or gross negligence in the manifestly unfounded Report, he/she shall proceed as set out above under (i) and shall order the closing of the Report as set out above under (ii).

In cases where the Report relates to Violations attributable to unlawful conduct relevant under Legislative Decree no. 231/2001 and violations of the 231 Model (referred to in point i) paragraph 4.2. "Subject of the Report - Violations"), the Reporting Manager shall transmit the aforementioned Report to the Supervisory Body under Legislative Decree no. 231/2001, through its Secretary, for its possible comments/recommendations.

6.5.1 Reports involving Top Management

In case of Reports involving the persons in charge of deciding possible disciplinary measures or other actions, the Reporting Manager immediately involves the Chairman of the Board of Directors/CEO, in order to coordinate and define the subsequent investigation process.

In case of Reports involving the Chairman of the Board of Directors and/or the CEO and/or other director with delegated powers, the Reporting Manager immediately informs the Board of Auditors.

In the event of Reports involving a member of the Board of Auditors and/or concerning the Supervisory Body or one of its members, the Reporting Manager shall immediately inform the Chairman of the Board of Auditors and the Chairman of the Board of Directors.

In the event of Reports involving the Chairman of the Board of Statutory Auditors, the Reporting Manager immediately notifies the most senior member of the Board of Statutory Auditors and the Chairman of the Board of Directors.

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6.6 Reporting to Top Management

The results of the assessments of all the Reports received will be included in an ad hoc report that will be periodically submitted to the Board of Directors/Board of Auditors.

The Reporting Manager is responsible for promptly informing the Board of Directors, the Board of Statutory Auditors and the Supervisory Body pursuant to Legislative Decree no. 231/2001 (if not already informed for not relevant Report according to Legislative Decree 231/01), of the outcome of the investigations and assessments carried out with respect to the Reports that have proved to be substantiated.

6.7 Retention of Reports and Related Documentation

The Reports and the related documentation shall be kept for as long as necessary for the processing of the Report and, in any event, no longer than five years from the date of the communication of the final outcome of the reporting procedure, or until the conclusion of any judicial or disciplinary proceedings that may have been carried out against the Reported Person or the Reporting Person, in compliance with the confidentiality obligations set out in Article 12 of the Decree and the principle set out in Article 5(1)(e) of the GDPR (limitation of retention) and Article 3(1)(e) of Legislative Decree No. 51 of 2018.

7. GENERAL PRINCIPLES AND SAFEGUARDS

Below are the principles and safeguards that the Company is committed to guaranteeing in the process of managing Reports.

Proper management of the Whistleblowing system will support the dissemination of a culture of ethics, transparency and legality within Acciaierie d'Italia. This purpose can only be achieved if Whistleblowers are provided not only with reporting channels, but also with the guarantee that they will not be subjected to retaliation by colleagues or superiors or other Company representatives or risk seeing their Report unheeded.

To this end, Acciaierie d'Italia protects the Whistleblower by guaranteeing the **confidentiality** of his/her identity and expressly **prohibiting acts of retaliation** for reasons directly or indirectly connected to the Report, in accordance with the provisions of the Decree, in addition to the limitations of liability set out in Article 20 of the Decree.

These safeguards and protective measures provided for by the Decree in favour of the Whistleblower only apply if the following conditions are met cumulatively:

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- the Whistleblower, at the time of the Report, of the public disclosure or of the complaint to the judicial or accounting authorities, had reasonable grounds to believe that the Breaches reported were true and fell within the objective scope of application set out in Section 4.2. - "Subject of the Report - Violations",
- the report or public disclosure was made in compliance with the provisions of this Procedure, as well as with the provisions of the Decree (in particular, by using the Channels, in compliance with the relevant conditions and access modalities).

These protections are not guaranteed if criminal liability of the Whistleblower for the offences of defamation or slander, or his/her civil liability for the same offence is established, in cases of wilful misconduct or gross negligence, even by a judgment of first instance.

Moreover, these safeguards and protection measures also apply in favour of:

- the so-called 'facilitators', i.e. the natural persons who, working in the same Work Context as the Whistleblower, assist him/her in the reporting process;
- the persons in the same Work Context as the Whistleblower and who are linked to the Whistleblower by a stable emotional or kinship link up to the fourth degree;
- the work colleagues of the Whistleblower who work in the same Work Context and have a stable and usual relationship with the latter;
- the entities owned by the Whistleblower or for which he/she works, as well as the entities that operate in the same Work Context as the Whistleblower.

These persons are also synthetically referred to in this Procedure as "Other Protected Subjects".

Any conduct in breach of the protections provided for in favour of the Whistleblower and of the other above-mentioned subjects may give rise to disciplinary proceedings against the person responsible and may be sanctioned by ANAC with a pecuniary administrative sanction, in accordance with Article 21 of the Decree.

7.1 Confidentiality

The Company guarantees the confidentiality of identity of the Whistleblower, the Reported Person, any facilitators and other subjects mentioned in the Report, as well as the confidentiality of the content of the Report and of the documentation attached to it.

The identity of the Whistleblower and any other information from which such identity may be inferred - directly or indirectly - cannot be disclosed without the express consent of the Whistleblower to subjects other than those competent to receive or follow up the Reports, as identified in this Procedure.

Moreover, the identity of the Whistleblower:

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- in the context of criminal proceedings, it is covered by secrecy in the manner and within the limits provided for in Article 329 of the Code of Criminal Procedure;
- in the context of proceedings before the Court of Auditors, it may not be disclosed until the preliminary investigation stage has been closed;
- within the framework of disciplinary proceedings, it cannot be disclosed, if the dispute of the relevant charge is based on investigations which are separate and additional to the Report, even if consequent to it. If the dispute is based in whole or in part on the Report, and knowledge of the Whistleblower's identity is indispensable for the accused person's defence, the Report may be used for the purposes of the disciplinary proceedings only if the Whistleblower expressly agrees to the disclosure of his/her identity. In such a case, the Whistleblower must be informed in writing of the reasons for the disclosure of confidential data and asked in writing whether he/she intends to give his/her consent to reveal his/her identity, with a warning that - if not - the Report cannot be used in the disciplinary proceedings.

The Whistleblower shall also be informed in writing of the reasons for the disclosure of confidential data, when the disclosure of his/her identity and of the information from which such identity may be inferred, directly or indirectly, is indispensable for the defence of the Reported Person.

The identity of the Reported Person, of the facilitator and of the subjects involved and mentioned in the Report shall be protected until the conclusion of the proceedings initiated as a result of the Report, with the same guarantees provided for in favour of the Whistleblower in this paragraph.

7.2 Prohibition of Retaliation

Whistleblowers cannot suffer any form of retaliation for having made a Report in compliance with the conditions for the application of the protections under the Decree. The Other Protected Subjects also cannot suffer any form of retaliation because of their role in the Whistleblowing process or the particular relationship that binds them to the Whistleblower (who has made a Report in compliance with the conditions for the application of the protections under the Decree).

Retaliation means any conduct, act or omission, even if only attempted or threatened, carried out as a consequence of the Whistleblowing, the complaint to the judicial or accounting authorities or public disclosure, which causes or may cause unjust damage, directly or indirectly, to the Whistleblower or the person who made the complaint.

By way of example, the following can be considered as retaliation, if all the requirements of the above-mentioned notion are met:

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- dismissal, suspension or equivalent measures;
- downgrading or non-promotion (where the Whistleblower had a legitimate expectation of such promotion, based on particular, precise and concordant factual circumstances);
- change of duties, change of workplace, reduction of salary, change of working hours;
- the suspension of training or any restriction of access to it;
- negative merit notes or references;
- the adoption of disciplinary measures or any other sanction, including a fine;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavourable treatment;
- the non-conversion of a fixed-term employment contract into a permanent employment contract (where the Whistleblower had a legitimate expectation of such conversion, on the basis of specific, precise and concordant factual circumstances);
- the non-renewal or early termination of a fixed-term employment contract (where the person reported had a legitimate expectation of such renewal, on the basis of particular, precise and concordant factual circumstances);
- damage, including to a person's reputation, in particular on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income;
- inclusion on improper lists on the basis of a formal or informal sector or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- the early termination or cancellation of a contract for the supply of goods or services;
- the cancellation of a licence or permit;
- the request to undergo psychiatric or medical examinations.

Whistleblowers and Other Protected Subjects who believe they are being retaliated against may, according to the procedures set forth in Section 9.1, notify ANAC for the sanctioning measures within its competence.

7.3 Limitation of Liability

A Whistleblower who discloses or disseminates information on violations covered by the obligation of secrecy (other than classified information, medical and forensic secret and court resolutions), or relating to the protection of copyright or personal data protection, or offending against the reputation of the person involved or reported, shall not be punishable if, (i) at the time of disclosure or dissemination, there were reasonable grounds to believe

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that disclosure or dissemination of the same information was necessary to disclose the violation and (ii) the report, public disclosure or complaint to a judicial authority was made in compliance with the conditions for protection against retaliation (both conditions must be met to exclude liability).

In any case, criminal, civil or administrative liability is not excluded for conduct, acts or omissions that are not related to the Report, the complaint to the judicial or accounting authority or the public disclosure, or that are not strictly necessary to disclose the breach.

7.4 Support Measures

A list of third-sector entities that provide Whistleblowers with support measures is established at ANAC.

The provided support measures consist of information, assistance and advice free of charge on how to report and on the protection from retaliation offered by national and EU legislation, on the rights of the person concerned, and on the terms and conditions of access to legal aid.

8. PROCESSING OF PERSONAL DATA

It should be noted that the personal data of the Report, the Whistleblower and the Reported Person (the latter being considered 'data subjects' within the meaning of Article 4 of GDPR) are processed in accordance with the GDPR and the Privacy Code.

In particular:

- processing activities related to the management of the Report are carried out in compliance with the principles set out in Articles 5 (Principles applicable to the processing of personal data), 25 (Data protection by design and protection by default) and 35 (Data Protection Impact Assessment) of the GDPR;
- prior to submitting the Report through the WB Platform, the Whistleblower receives the privacy notice pursuant to the GDPR, which provides information on the purposes and methods of the processing of his/her personal data, the duration of storage, the categories of recipients to whom the data may be disclosed in the context of the management of the Report, and the rights granted to the Reporting Person by the GDPR. The privacy policy under the GDPR is also made available to the Reported Person;
- the legal basis for the processing is the fulfilment of a legal obligation to which the Company is subject under the Decree;

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- Personal data will be processed within the European Economic Area (EEA) and stored on servers located within the EEA. Any extra-EEA data transfers will in any case be handled in compliance with Chapter V of the GDPR;
- as indicated in the privacy policy provided to data subjects, personal data are processed for the time necessary to achieve the purposes justifying their collection and processing (e.g. collection and management of the Report) and are subsequently erased or anonymised in accordance with the established retention periods;
- appropriate technical (encryption within the WB platform) and organisational measures are taken to ensure the security of personal data, in accordance with current legislation, both during the transmission of the Report and during its analysis, management and storage;
- the exercise of rights by the Whistleblower or the Reported Person in respect of his or her personal data processed within the whistleblowing process is excluded pursuant to Article 2-undecies of the Privacy Code where such exercise may result in actual and concrete prejudice to the '*confidentiality of the identity of the person reporting violations of which he or she has become aware by reason of his or her employment relationship*'.

Access to the personal data of Reports is granted only to the Reporting Manager already authorised under the GDPR, limiting the disclosure of confidential information and personal data to third parties only when necessary.

The data controller is the Company, which has appointed a Data Protection Officer (DPO), who can be contacted at the following e-mail address: dpo@acciaierieditalia.com.

9. EXTERNAL REPORTING CHANNELS AND PUBLIC DISCLOSURE

9.1 ANAC's External Reporting Channels

In cases where the Report relates to Breaches of European Union law as referred to in points ii), iii), iv), and v) of Section 4.2. above "Subject of the Report - Violations" and one of the following conditions is met:

- when no internal reporting channel has been set up or when this, even if provided for, is not active;
- when the internal channel adopted does not comply with the provisions of Article 4 of the Decree;
- when the Report made by internal channel has not been followed up;

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- when the Whistleblower has reasonable grounds - based on the particular, precise and concordant circumstances of the case - to believe that, if he/she were to make a Report through internal channels, it would not be effectively followed up or the Report itself might give rise to the risk of retaliation;
- when the Whistleblower has reasonable grounds - based on the particular, precise and concordant circumstances of the case - to believe that the breach may constitute an imminent or obvious danger to the public interest,

the Whistleblower may make an external Report, through one of the channels made available by ANAC, which guarantee, also through the use of encryption tools, the confidentiality of the identity of the Whistleblower, of the Reported Person, as well as of the content of the Report and of the relevant documentation.

So-called external Reports can be made, through the tools adopted by ANAC (<https://www.anticorruzione.it/-/whistleblowing>), in writing through the IT platform or orally through telephone lines or voice messaging systems or, at the request of the Whistleblower, through a direct meeting set within a reasonable timeframe.

The external Report submitted to a person other than ANAC is transmitted to the latter, within 7 (seven) days from the date of its receipt, with simultaneous notification of the transmission to the Whistleblower.

9.2 Public Disclosure

In cases where the Report relates to Breaches of European Union law as referred to in points ii), iii), iv), and v) of Section 4.2. above "Subject of the Report - Violations" and when one of the following conditions is met:

- the Whistleblower has previously made a Report through Internal and External Channels, or has made an External Report directly, and in all these cases no reply has been given within the set timeframe;
- the Whistleblower has reasonable grounds - based on the particular circumstances of the case, which are serious, precise and concordant - to believe that the breach may constitute an imminent or obvious danger to the public interest (e.g. an emergency situation or the risk of irreversible harm, including to the physical safety of one or more persons, requiring the breach to be disclosed promptly and have a wide resonance to prevent its effects);
- the Whistleblower has justified and reasonable grounds - on the basis of the particular circumstances of the case, which are serious, precise and concordant - to believe that the external report may entail the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those in which

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evidence may be concealed or destroyed, or in which there is a well-founded fear that the person who received the report may be colluding with the author of the breach or be involved in the breach itself,

the Whistleblower may make a Public Disclosure, through the press or electronic media or means of dissemination capable of reaching a large number of people.

10. DISCIPLINARY SYSTEM

It should be noted that any failure to comply with the provisions of this Procedure may result in the imposition of disciplinary sanctions, in the cases provided for by law.

In this regard, it is specified that the Company may impose disciplinary sanctions, as provided by the Company's Disciplinary Code, the applicable National Collective Labour Agreement and the 231 Model, on those who:

- retaliate against the Whistleblower, obstruct or attempt to obstruct Reports, breach confidentiality obligations as described above;
- have not carried out the verification and analysis of the Reports received.

11. PUBLICATION OF THE PROCEDURE

This Procedure is displayed and made easily visible at the company's premises and published on Acciaierie d'Italia's website, in the following dedicated section <https://www.acciaierieditalia.com/it/policy-e-documenti/> and is also communicated to employees, made available in the Company Repository of Standards and on the Employee Portal.