

INFORMATION ON THE USE OF FRATELLI CARLI S.P.A. BENEFIT COMPANY'S PLATFORM FOR SUBMITTING REPORTS ACCORDING TO THE REGULATION ON "WHISTLEBLOWING"

1. THE PLATFORM FOR SUBMITTING REPORTS

The legislative Decree 10/03/2023 No. 24 implemented in Italy the (EU) regulations 2019/1937 of the European Parliament and Council of 23rd October 2019, regarding the protection of persons reporting violations of the European Union law and supplying the indications for the protection of the persons reporting violations of the national regulations.

Fratelli Carli S.p.A. Benefit Company (hereafter "the Company"), in accordance with the above mentioned Legislative Decree 10/03/2023 n. 24, has activated its own internal reporting channel by means of a digital platform, by which reports regarding violations of the regulations, of which the reporting entities have become aware in their working environment and able to harm the public interest or the Company's integrity, can be submitted.

The Company has adopted the necessary measures in order to protect the privacy of the reporting person (the so-called *whistleblower*) and of all other people involved.

2. PEOPLE WHO ARE ALLOWED TO SUBMIT A REPORT AND WHO CAN ENJOY PROTECTION IN CASE THEY SUBMIT A REPORT

The entities who can submit a report and to whom the protection, in accordance with the Legislative Decree 24/2023, is granted, are as follows:

- The Company's employees (including those workers whose working relationship is regulated by the Legislative Decree 81/2015 and those workers supplying occasional services according to Art. 54 bis of the Legislative Decree 50/2017).
- Self-employed workers (Including those indicated in Chapter I of the Law 81/2017, those workers having a working relationship as per Art. 409 c.p.c. and as per Art. 2 of the Legislative Decree 81/2015) and carrying out their services for the Company.
- Freelance professionals and advisors carrying out their services at the Company's premises.
- Volunteers and trainees, whether paid or unpaid, carrying out their services for the Company
- Physical persons owing Company's shares
- Persons having administrative, managing, controlling, vigilance or representing functions, also in case such functions are carried out on a factual basis for the Company;
- The workers and collaborators carrying out their professional services for the Company or those supplying goods or services or carrying out works in favor of third parties.

3. SUBJECT OF THE REPORT

The subject of the reports can be behaviors, acts and omissions harming the public interest or the Company's integrity and consisting of violations of the following regulations of the European Union and of the following national dispositions as implementation of such directives;

- Offences committed as violations of the European Union regulations as indicated in the Annex to Legislative Decree 24/2023 and of all those national dispositions implementing them (even though these are not specifically indicated in the above-mentioned annex), regarding in particular the following sectors: public contracts, services, financial products and markets, prevention of money laundering and terrorist financing, product safety and conformity, transport safety, environment protection, radiation protection and nuclear safety, food and feed safety and animals' wellbeing, public health, consumers' protection, protection of people's private lives and personal data and security of network and information systems;
- Acts or omissions harming the financial interests of the European Union as per Art. 325 of the Treaty on the functioning of the European Union, as described in the regulations, directives, decisions and recommendations and advice of the European Union;
- Acts and omissions regarding the internal market as per Art. 26, paragraph 2, of the Treaty on the functioning of the European Union, including the violations of the EU regulations regarding competition and State aids as well as the violations concerning the internal market connected to actions violating the tax regulations for companies and to those mechanisms whose aim is to obtain a fiscal advantage nullifying the object and finality of the regulations regarding the taxes on companies.
- Acts and omissions nullifying the object and the finality of the EU dispositions regarding the above-mentioned points.

Also, information regarding those conducts aiming at concealing the above-mentioned violations can become the subject of reporting.

The information which are the subject of a report can affect the committed violations as well as the violations not taking place yet but which the reporting entity, reasonably and on the on the basis of concrete evidence, is led to believe they may be committed.

The following matters are not included in the application of the Legislative Decree 24/2023 and cannot be the subject of reporting:

- News that are obviously groundless or those information acquired on the basis of scarcely reliable indiscretions or rumors.
- Disputes, claims and requests connected to the reporting person's personal interests and regarding solely individual working relationships, that is to say, concerning the person's working relationships with hierarchically higher figures.
- Violation Reports where already provided for in a compulsory basis by the Acts of the European Union

or by the national regulations as indicated in Chapter II of the Annex to the Legislative Decree 24/2023, or by the national dispositions resulting from the implementation of the Acts of the European as described in Chapter II of the Annex to the EU Directives 2019/1937, although they are not indicated in Chapter II of the Annex to the Legislative Decree 24/2023;

- The violation Reports regarding national security as well as the contracts concerning defense or national security issues unless these issues are not already included in the relevant European Law.

4. FEATURES OF THE REPORT

In order to facilitate the management of the report and the assessment of the violation by the entity in charge of such functions, the report must be as clear and detailed as possible.

The reporting person will therefore have to:

- indicate the time and place circumstances in which the fact took place;
- describe the fact which is the subject of the report;
- indicate the elements allowing to identify the person to whom the reported facts must be attributed;
- wherever possible, indicate all other subjects who are potentially aware of the facts;
- enclose all available documents which can supply elements confirming the validity of the reported facts.

It is appropriate that, in the subject of the report, the person reporting clearly indicates that he intends to keep his identity confidential and thus take advantage of the protection guaranteed for the whistleblower.

In case anonymous reports are submitted – that is to say, reports not allowing to obtain the reporting person's identity – these will be treated in the same way as ordinary reports. In case the reporting person is identified later, the person will be anyway protected against reprisals.

5. MODES FOR SUBMITTING REPORTS

Reports can be submitted by means of the digital platform activated by the Company, accessible through the public link available on the Internet sites oliocarli.it, .de, .at, .ch, .fr, .be and mediterranea.it, in written form or orally, by means of vocal messages.

In accordance with the Legislative Decree 24/2023, the platform guarantees – by using cryptographic tools – the reporting person's confidentiality as well as that of other people involved or anyway mentioned in the report, in the contents of the report and the related documentation.

The platform allows to submit two different types of report:

- 1) Confidential reports in which the reporting person is asked to enter his personal data and to describe the report according to the indications in the previous paragraph.

- 2) Anonymous reports, in which the reporting person is not asked to enter his personal data but to solely describe the report as indicated in the preceding paragraph.

6. MODES FOR MANAGING AND ASSESSING THE REPORT

The Company has entrusted the management of reports to an independent and unbiased subject outside the Company ("Report Manager") who is the recipient of the reports and who was designated by the Company as person responsible for the treatment of personal data ex Art. art. 28 EU Regulation 2016/679.

After completing the report, the system assigns an alphanumerical code to it, which the reporting person can later use to visualize the report status and communicate with the Report Manager, by using the protected communication channel within the platform.

The Report Manager sends an acknowledgement of receipt to the reporting person, within 7 days from the date of receipt.

The reporting person is given the possibility to supplement the report by using the platform, by adding documents, video and audio files.

The Report Manager carries on with the communications with the reporting person and can ask him for additional information, by using the protected communication channel within the platform and also by meeting him in person, in case the reporting person asks for a direct encounter.

The Report Manager carries out a preliminary evaluation to assess if the requirements for accepting the validity of the report are met. The report can be considered inadmissible:

- If it is manifestly groundless, in case there are no factual elements justifying further assessments;
- If the contents are too generic in a way that does not allow to understand the facts.
- If the report is accompanied by inappropriate or not applicable documentation, not allowing to understand the contents of the report.

If the report is considered inadmissible, the Report Manager starts an investigation in order to assess, in reasonable times and in compliance with data protection requirements, the validity of the reported violations.

To this aim, the Report Manager carries out any necessary activity (i.e., contacting the reporting person and/or summoning him for a personal consultation in order to gather any additional information regarding the report and the documents which were annexed to it, summoning other subjects able to supply any information on the reported facts etc.). The manager can recur, if necessary, to the cooperation of competent subjects within the Company or of external consultants, properly trained and authorized

At the end of the assessing process, the Report Manager:

- In case of groundless reports, he proceeds to file the report by exposing the reasons leading to such

decision.

- In case of a grounded report, he communicates the outcome of the assessment to the Company's management and to the relevant company functions, so that they will be able to implement the disciplinary action towards the person being the subject of the report or anyway towards the people having illicit conducts or who committed the reported violations and also allowing to implement all the necessary further measures and/or file a complaint with the Judicial Authority, should this turn out to be necessary,

In both cases, the Manager also supplies feedback to the reporting person and informs him about the measures which were adopted, or which will be adopted, with the reasons therefor.

In any case, the reporting person is informed about the outcome of the report within 3 months from the date of acknowledgement of receipt, by accessing the platform and digiting the alphanumerical code which was assigned.

The Reports and the relevant documentation are kept for the time necessary to treat the report and in any case not more than five years from the communication of the final outcome of the reporting procedure.

7. EXTERNAL COMMUNICATION CHANNEL

According to the Legislative Decree 24/2023, Art. 6, the reporting person can also submit an external report regarding the violations as per previous § 3, by means of a dedicated reporting channel activated by the National Anticorruption Authority (ANAC), if any of the following conditions is met:

- Mandatory activation of the internal reporting channel within the working environment or, if such channel, though mandatory, is not active or if active, is not confirm to what is required by the Law.
- If the reporting person already submitted an internal report and this was not followed up.
- The reporting person has grounded reasons to believe that, if he submits an internal report, this would not be followed up and the report itself could determine a risk of retaliation.
- The reporting person has grounded reasons to believe that the violation may represent an imminent or obvious threat for the public interest.

External Reports are submitted in written form by means of the digital platform of ANAC or orally by phone or by means of vocal messages or, upon the reporting person's request, by a direct encounter fixed within a reasonable deadline.

8. PRIVACY PROTECTION

Maximum privacy protection is guaranteed to the reporting person's identity, both in case of a confidential report or of an anonymous one.

In particular:

1. In the case of a confidential report, the reporting person's personal data will not be visible to the Report Manager himself or to other people, also within the Company, who are authorized to receive and follow up on the reports, unless this is required by management needs or enquiries related to the report and, in any case, always respecting the reporting person's privacy and as a guarantee for an efficient management of the report. In such cases, the Report Manager will be able to access readable data related to the reporting person, in order to manage or follow up on the report.
2. In the case of an anonymous report, the reporting person's data will not be visible, in any way, to the Report Manager himself or to those people, also within Fratelli Carli, who are authorized to receive or follow up on reports, unless the reporting person decides to disclose his identity by means of the protected communication channel on the platform.

In any case, the reporting person's identity, if a confidential report or any other information have been submitted, from which is it possible to infer the person's identity, cannot be disclosed to other people than those authorized to receive or follow up on reports without the reporting person's consent. Such consent can be requested by means of the protected communication channel on the platform.

Until the procedures related to the report are concluded, the identity of all other people involved or mentioned in the report is equally protected, with the same guarantees as for the reporting person himself.

In the context of possible criminal proceedings, the reporting person's identity is kept confidential in the modes and within the limits provided for by Art. 329 of the Code of Criminal Procedure.

In the context of a proceeding in front of the Court of Auditors, the reporting person's identity cannot be disclosed until the end of the investigation phase.

Whenever, following the submission of a report, a disciplinary procedure is started, if the objection to the charge is based on further distinct assessments other than those of the report, the reporting person's identity cannot be disclosed; in the case in which, instead, the objection is wholly or partially based on the report and the acknowledgment of the reporting person's identity is indispensable for defending the charged person, the report will be usable only in the presence of the reporting person's consent to disclose his identity, possibly released by using the protected communication channel on the platform.

In any case, when the disclosure of the reporting person's identity or of other information from which the identity can be inferred, is indispensable, also for the defense of the reported person, the reporting person is informed by means of a written communication in which the reasons for the disclosure of the above mentioned information are explained.

9. PROTECTION OF THE REPORTING PERSON AND POSSIBLE RETALIATION

The Company does not allow any retaliation towards the reporting persons.

By retaliation, as per Art. 2, paragraph 1, letter m), Legislative Decree 24/2023, we mean *“Any conduct, act or omission, even if only attempted or threatened, carried out following the submission of a report, the filing of a complaint to the judicial or audit authorities or the public disclosure of information which causes or may*

cause an unjust damage, in a direct or indirect way, to the reporting person or to the person filing a complaint to the judicial authorities”.

The reporting persons who believe they have been the object of retaliation can exclusively communicate this to ANAC for the necessary verifications provided for by the law and for the application of an administrative penalty for the person responsible, if necessary.

In order to apply the protection measurements against retaliation, provided for by Legislative Decree 24/2023 for the protection of the reporting person and also of those people who may be the object of indirect retaliation owing to their roles in the context of the reporting process or because of their particular relations with the reporting person, it is necessary that:

- the person who has submitted the report on the basis of a reasonable belief that the information related to the reported violations are truthful and included in the objective scope of application of the above-mentioned Decree;
- The report has been submitted according to the modes provided for by Chapter II of the Legislative Decree 24/2023;
- There is a relation of consequentiality between the submitted report and the retaliation suffered.

No protection is guaranteed in case of retaliation, whenever the reporting person, also following a first instance judgement, is charged with the accusation of libel and slander crimes and his civil responsibility, in case of intent or gross negligence, is ascertained. In such a case, a disciplinary sanction will be applied to the reporting person.