

PROCEDURE FOR REPORTING VIOLATIONS (WHISTLEBLOWING)

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ANNEX 1 – INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PERSONS WHO REPORT BREACHES OF EUROPEAN UNION LAW OR NATIONAL REGULATORY PROVISIONS, OF THE PERSONS INVOLVED, OF THE PEOPLE MENTIONED AND THE FACILITATORS 17

1. PURPOSE

This document aims to regulate the methods through which to report any violations of national or European Union regulatory provisions that damage the integrity of A&G S.r.l. (hereinafter also "the Company"), by anyone who has become aware of it within the scope of the employment, collaboration or professional relationship, with the Company or, in any case, in working context as defined below.

In particular, this document intends to illustrate: the channels, procedures and prerequisites for carry out internal or external reports, as well as the operational instructions that the reporter must observe to present them; the protections reserved for the whistleblower, as well as the responsibilities in which the same could incur reports that turn out to be false or unfounded; the measures envisaged to protect reporting persons and other subjects in various capacities involved in the reporting.

This document is drawn up in compliance with the provisions of the Legislative Decree. 10 March 2023, n. 24, containing the implementation of Directive (EU) 2019/1937 (hereinafter also "Decree") and concerning the protection of persons reporting violations of Union law and national regulatory provisions.

2. DEFINITIONS

The terms indicated in this document with a capital letter must be given the following meaning indicated: Report Management Committee: the person, internal or external, formally appointed by the Reporting channel management company.

Work Context: the working or collaborative relationship between the Reporting Person and the Company, present or past, within which, regardless of the nature of the activity carried out, the person acquires Information about Violations and for which you may suffer retaliation in the event of Reporting, Disclosure Publish or report to the competent authorities.

Public disclosure: any behaviour suitable for placing information on the information in the public domain Violations via print, electronic or other means of dissemination capable of reaching a large number of people.

Facilitator: the natural person who assists the Reporting Person in the Reporting process, operating within the same working context and whose assistance must be kept confidential.

Violation Information: information, including reasonable suspicions, regarding Violations committed or which, based on concrete elements, could be committed within the organisation Company, as well as elements regarding conduct aimed at concealing such Violations.

Person Involved and/or Mentioned: the natural or legal person mentioned in the Report, whether internal or external, or in the Public Disclosure to which the Reporting Person attributes the commission of Violation which is the subject of the Report or Public Disclosure or in any case implied in the aforementioned Violation.

Reporting Person: the natural person who carries out the Report or Public Disclosure of Information on Violations acquired within your Work Context. In particular they are entitled to make reports to subjects who belong to one of the following categories:

- employed workers on a fixed-term or permanent basis, part-time or full-time;
- workers with intermittent employment contracts or job on call;
- employees of employment agencies or temporary employees;
- apprentices;
- casual workers pursuant to art. 54-bis of the Legislative Decree 50/2017;
- self-employed workers, collaborators, consultants, workers with collaborations organized by client
- collaborative relationships referred to in art. 409 c.p.c., i.e. agency and representation relationships commercial and other collaborative relationships that result in a performance of work continuous and coordinated, mainly personal, even if not of a subordinate nature;
- workers or collaborators who carry out their work for entities in the sector public or private that provide goods or services or carry out works for third parties;
- freelancers or consultants;
- volunteers or interns, paid or unpaid;
- shareholders;
- people with administrative, management, control, supervisory or representation functions, and also if these functions are exercised on a purely de facto basis;
- each of the subjects previously listed means Reporting Person even when the Information about Violations is learned during the selection process or at other stages pre-contractual and/or during the relationship, and even if:
 - the legal relationship has not yet started;
 - during the probationary period;
 - following the termination of the legal relationship.

Feedback: communication to the Reporting Person of information relating to the follow-up that is given or that occurs intends to give to the Report.

Retaliation: any behavior, act or omission, even if only attempted or threatened, carried out in reason for the Report, Public Disclosure or reporting of the Violation to the authorities and that causes or may cause, directly or indirectly, unfair damage to the Reporting Person (or to the person who filed the complaint or who made a public disclosure) and/or to other parties specifically identified by the standard.

Report: the communication of Information on Violations, written or oral, made according to the channels of described below.

Internal Reporting: The communication, written or oral, of Breach Information submitted via the internal reporting channel referred to in paragraph 5 below.

External Report: The communication, written or oral, of the Breach Information, submitted via the external reporting channel, established by ANAC, referred to in paragraph 6 below.

Follow-up: the action taken by the Report Management Committee to assess the existence of the facts reported, the outcome of the investigations and any measures adopted.

Violation: any behavior, act or omission that damages the integrity of the Company and, in particular:

1. offenses falling within the scope of application of European Union or national acts relating to the following sectors:

- public procurement;
- financial services, products and markets and prevention of money laundering and financing terrorism;
- product safety and conformity;
- 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 systems informative;

2. acts or omissions detrimental to the financial interests of the Union referred to in Article 325 of the Treaty on the Functioning of the European Union specified in relevant secondary legislation of the European Union;

3. acts or omissions relating to the internal market, as referred to in Article 26(2) of the Treaty on functioning of the European Union, including infringements of European Union competition and state aid rules, as well as infringements relating to the internal market linked to acts infringing corporate tax rules or mechanisms whose aim is to obtain an advantage tax which defeats the object or purpose of the applicable corporate tax legislation;

4. acts or behaviours that nullify the object or purpose of the provisions of the Union acts in the sectors indicated in numbers 1), 2) and 3).

3. REPORT WITH CONTENTS EXCLUDED FROM THE APPLICATION OF THE REGULATION

This document does not apply to reports concerning disputes, claims or requests linked to a personal interest of the Reporting Person that they concern exclusively to their individual working relationships, or inherent to their working relationships with the figures hierarchically superordinate: therefore, for example, reports regarding disputes are excluded work, discrimination between colleagues, interpersonal conflicts between the Reporting Person and another worker or with hierarchical superiors, reports relating to data processing

carried out in the context of the relationship individual work in the absence of damage to the integrity of the Company.

Are also excluded:

- reports of violations regulated in the directives and regulations of the European Union and in implementing provisions of the Italian law which already guarantee specific procedures report;
- reports of violations relating to national security, as well as contracts relating to aspects of defence or national security, unless such aspects fall within the relevant secondary legislation of the European Union.

4. CONTENTS OF THE REPORT

It is very important to take the following aspects into consideration, in relation to the content of the Report:

- A. The Report must contain Information on the Violations that is detailed and based on elements of made precise and concordant.
- B. Reports may concern both committed Violations and those not yet committed the Reporting Person reasonably believes they could be based on concrete elements. Those elements that concern conduct aimed at conceal Violations.
- C. News is not included in the Information on Reportable or Reportable Violations clearly unfounded, information that is already totally in the public domain, as well as information acquired only on the basis of rumours or rumours reliable (so-called rumours).

5. INTERNAL REPORTING

A. The Company has activated a specific Internal Reporting channel, which guarantees confidentiality of the identity of the Reporting Person, the Facilitator, the Person Involved, and other people however, mentioned in the Report, of the content of the Report itself and of the related one documentation at this [LINK](#)

B. Consequently, the Company has identified an element of management of reports, to which they come assigned the specific tasks required by the legislation in the management of reports, composed of following members:

- Andronico Giuseppe as Administrator;
- D'Urso Giovanni as Editor;
- Claudia Lombardo as Editor;

C. If a member of the Reporting Management Committee has a conflict of interest, as for example, is the Person involved and/or mentioned or the Reporting Person, the Report will come managed by the other member and the member in conflict of interest will, from that moment, abstain from management.

D. It is specified that if the Internal Report is submitted to a person other than the Committee for Report Management and outside the reporting channel implemented by the Company, only in cases where the Reporting Person explicitly declares that he wishes to benefit from the protections provided from this procedure or this intention can be deduced from the Report, the same will be considered as such and will be transmitted, within seven days of its receipt, to the Management Committee reports, giving simultaneous notice of the transmission to the Reporting Person. Otherwise, said report is considered an ordinary report.

E. The Internal Report must contain, among other things, the following elements:

In particular, the following must be clear:

- the circumstances of time and place in which the reported event occurred;
- the description of the fact;
- personal details or other elements that allow the identification of the person to whom the reported facts can be attributed.

It is also useful to attach documents that can provide elements of substantiation of the facts in question reporting, as well as the indication of other subjects potentially aware of the facts.

F. The internal reporting channel allows anonymous reporting. As reported at paragraph 4., the Reports must contain sufficient elements to identify the subject matter of reporting and put the Reporting Management Committee in a position to carry out each necessary action aimed at ensuring efficient and timely management of reports (e.g. as part of disciplinary proceedings initiated against the alleged perpetrator of the conduct reported). It is highlighted that anonymous reports could reduce the possibilities of carry out some of the aforementioned investigations or prosecute the reported conduct.

G. The Reporting Person who intends to make a Report of which he became aware in Work Context can do so in the following ways:

a) through the dedicated section of the website at the link <https://whistlesblow.it/c/a-e-g-srl/2> ; by logging in at this link you will have access to a platform where the Reporting Person must

- 1) indicate all the information requested, as referred to in point E of this paragraph
- 2) take vision of the Privacy Policy and 3) describe the fact by specifying the details in a specific form platform section;

or

b) requesting a meeting with the Report Management Committee which will be agreed with the Reporting in a suitable place to guarantee confidentiality. Subject to the consent of the Person Reporting, the meeting will be recorded using a recording system suitable for conservation and listening. Where the Reporting Person does not give his consent, the declarations thereof will be

recorded in writing. In this case, the Reporting Person can verify and rectify the minutes of the meeting and, following this, will confirm it through the own subscription.

H. The Report received will be subject to analysis and verification of the facts indicated therein by the Committee Management of reports, which:

1. will adopt all necessary measures to guarantee the confidentiality of the Reporting Person, of Facilitator, of the Person Involved, of the other people mentioned in the Report, the content of the Report itself and the related documentation;
2. will issue to the Reporting Person notice of receipt of the Report within seven days from the date of receipt;
3. in the event of a request for a meeting, it will arrange the same within a reasonable time of receipt of the Report;
4. will also take steps to verify the subject, truthfulness and seriousness of the Report received requesting further additions in writing to the Reporting Person, which will be sent to them once recorded or recorded in writing;
5. where what is reported is not adequately substantiated, the person who monitors the Management of Reports may request additional information from the Reporter via the channel dedicated to this purpose, or even in person, where the Reporter has requested a direct meeting;
6. will be able to interface with other company functions and figures to request collaboration for a better investigation and analysis of the Report, in absolute compliance with the guarantees of confidentiality referred to in the Decree and in this procedure;
7. may carry out investigative activities also with the involvement of external consultants, in absolute compliance with the guarantees of confidentiality referred to in the Decree and in this procedure;
8. within 3 months from the date of the acknowledgment of receipt referred to in point 2., will inform the Person Reporter of the follow-up that has been given or that is intended to be given to the Report.
9. The activities carried out are documented. The archiving of the documentation takes place guaranteeing the adoption of measures to protect confidentiality according to the principles set out in the Decree and to this procedure and in compliance with the retention terms indicated (paragraph 8).

5.1. INADMISSIBILITY OF THE REPORT

A. If the Reporting Person is not among the subjects who can make the Reports or reported facts do not fall within the Violations, according to the provisions of the Decree, the Person The reporting party will be informed within the deadlines established by law that the Report will not be possible follow up for these reasons; in this case the Reporting Person may be guided in presentation of the report using the ordinary

channels that the Company makes available (e.g. e-mail, telephone numbers, etc.) but will not enjoy the specific safeguards and protection provided by the Legislative Decree. 24/2023, indicated below in paragraph 7.

B. The Report is considered inadmissible, even in compliance with the subjective and objective requirements of referred to in the previous paragraphs, and is archived by the Report Management Committee for the following reasons:

- a) manifestly unfounded due to the absence of factual elements attributable to the typified violations: as an example, consider reports characterized by issues of character mainly personal of the Reporter aimed at obtaining verification on the merits of their own subjective events, as well as reports of violations that cannot be classified as illicit and therefore not supported by any motivation regarding the rule that is alleged to have been violated;
- b) ascertained generic content of the Report of offense such as not to allow the understanding of the facts, or reporting of offenses accompanied by non-documentation appropriate or irrelevant such that the content of the report itself is not understood;
- c) production of documentation only in the absence of the Report of Illicit Conduct.

6. EXTERNAL REPORTING AND PUBLIC DISCLOSURE

The Reporting Person can also make a Report, via the channel established by the ANAC (so-called «External Report») exclusively if, at the time of the Report, one of the following occurs conditions:

- a) the Reporting Person has already made an Internal Report pursuant to the above described in paragraph 5 and the same has not been followed up;
- b) the Reporting Person has reasonable grounds to believe that, if he were to make an Internal Report, the same would not be given an effective follow-up, or that the Report itself could determine the risk of retaliation;
- c) the Reporting Person has reasonable grounds to believe that the Violation may constitute a danger imminent or obvious in the public interest.

In the absence of at least one of the above conditions, the Reporting Person will not be able to activate the channel External reporting.

Like the Internal Signaling channel, the External Signaling channel activated by ANAC also guarantees the confidentiality of the identity of the Reporting Person, the Facilitators, the Person Involved and others persons mentioned in the Report, of the content of the Report itself and of the related one documentation. The same confidentiality is also guaranteed when the Report reaches individuals other than those responsible for processing the Reports, to whom it is in any case transmitted without delay.

External Reports can be made through the channels specifically set up by ANAC:

- IT platform on the ANAC institutional website, by clicking the link to the dedicated page, you can access to the service dedicated to “whistleblowing” (<https://www.anticorruzione.it/-/whistleblowing>).
- Oral reports.
- Direct meetings set within a reasonable time.

The Reporting Person may also make a Public Disclosure, under even more stringent conditions as explained in relation to External Reporting¹, without prejudice to the possibility of making complaints to the judicial authority.

7. PROTECTIONS AND SUPPORT MEASURES

The protection system provided for by the Decree is made up of the following types of protection:

1. the protection of the confidentiality of the Reporting Person, the Facilitator, the Person Involved and the people mentioned in the Report (infra paragraph 7.1);
2. protection from any retaliatory measures adopted by the entity as a result of the Report, disclosure public or complaint made and the conditions for its application (infra paragraph 7.4);
3. the limitations of liability with respect to the disclosure and dissemination of certain categories of information that operates under certain conditions;
4. the provision of support measures by third sector bodies included in a specific list published by ANAC (infra paragraph 7.5).

7.1 PROTECTION OF CONFIDENTIALITY

The Company guarantees the confidentiality of the identity of the Reporting Person, the Facilitator and the Person Involved and of the people mentioned in the Report, as well as the confidentiality of the content of the Report and the documentation attached to it.

The Reports may not be used beyond what is necessary to give adequate follow-up to them.

Reports received in compliance with the previous paragraphs of this procedure will be collected and processed solely by the Report Management Committee, whose members are identified and authorised pursuant to current legislation on the protection of personal data.

Furthermore, the identity of the Reporting Person:

- in the context of disciplinary proceedings, cannot be revealed, if the dispute of the related charge is based on investigations that are distinct and additional to the Report, even if resulting therefrom. If the dispute is based in whole or in part on the Report e knowledge of the identity of the Reporting Person is essential for the subject's defense accused, the Report will be usable for the purposes of disciplinary proceedings only in the presence of the express consent of the Reporter to the disclosure of his/her identity.

In this case, it must be given written communication to the Reporter of the reasons for revealing the confidential data and must be provided to him requested in writing if you intend to give consent to reveal your identity, with notice that – in otherwise - the Report cannot be used in disciplinary proceedings.

The prohibition on revealing the identity of the Reporting Person refers not only to the name but also to any other information or element of the report, including the documentation attached to it, from the disclosure of which the identity of the reporter can be deduced directly or indirectly.

The confidentiality of the Facilitator, the Person Involved and/or Mentioned in the report must be guaranteed up to at the conclusion of the proceedings initiated as a result of the report and in compliance with the same guarantees

- the Reporting Person has prior made an Internal and External Report or directly made an External Report and no response was given within the established deadlines^I regarding the measures envisaged or adopted to follow up on reports;

- the Reporting Person has a well-founded reason to believe that the violation may constitute an imminent or obvious danger to the public interest;

- the Reporting Person has a well-founded reason to believe that external reporting may carry the risk of retaliation or may not be effectively followed up due to the specific circumstances of the specific case, such as those in which evidence can be hidden or destroyed or in which there is grounds for more than the person who received the Report may be in collusion with the perpetrator of the violation or involved in the violation itself.

provided in favour of the Reporting Person, except in the case in which the reports are the subject of a report to the judicial authorities.

7.2 SUBJECTS PROTECTED FROM RETALIATION

Protection from retaliation, in addition to Reporting Persons as defined in paragraph 2, is also extended:

- to the Facilitators;
- to people from the same work context as the Reporting Person and who are linked to it comes from a stable emotional or kinship bond within the fourth degree;
- to the Reporting Person's work colleagues who work in the same Work Context of the same and who have a habitual and current relationship with said person;
- to entities owned by the Reporting Person or for which the same works, as well as to entities that operate in the same working context as the aforementioned Person;
- in the case of Anonymous Reporting, if the Reporting Person has subsequently been identified.

7.3 PROHIBITION OF RETALIATION

If the conditions referred to in the previous paragraphs are met, the Company will guarantee the protection of the subjects referred to in paragraph 7.2 from any form of Retaliation.

It can be considered retaliation:

- a) dismissal, suspension or equivalent measures;
- b) demotion or failure to promote;
- c) change of functions, change of place of work, reduction of salary, modification working hours;
- d) the suspension of training or any restriction of access to it;
- e) negative merit notes or negative references;
- f) the adoption of disciplinary measures or other sanctions, including pecuniary ones;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavourable treatment;
- i) failure to convert a fixed-term employment contract into a fixed-term employment contract indefinite, where the worker had a legitimate expectation of said conversion;
- j) failure to renew or early termination of a fixed-term employment contract;
- k) damage, including to the person's reputation, in particular on social media, or economic prejudice or financial, including loss of economic opportunities and loss of income;
- l) inclusion in improper lists on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in the sector or in industry in the future;
- m) the early termination or cancellation of the contract for the supply of goods or services;
- n) the cancellation of a license or permit;
- o) the request to undergo psychiatric or medical tests.

Alleged retaliations, even if only attempted or threatened, must be communicated to ANAC to which it belongs entrusted with the task of ascertaining whether they are consequent to the reporting, denunciation or public disclosure carried out.

Any retaliatory or discriminatory actions against the Reporting Person will be prosecuted by Company and may expose the person who implemented them to disciplinary sanctions, based on what required by law and company regulations on the matter.

7.4 REQUIREMENTS FOR PROTECTION FROM RETALIATION

The conditions for the subjects referred to in paragraph 7.2 to receive the protection provided by law are the following:

- the individual reported based on a reasonable belief that the Violation Information reported are truthful and fall within the objective scope of application of the Legislative Decree. 24/2023;

- the Report was carried out in accordance with the provisions of the Legislative Decree. 24/2023 and hereby procedure;

- there is a consequential relationship between the Report made and the retaliatory measures suffered.

However, mere suspicions or rumors are not enough. The certainty of the facts and the reasons are not relevant personal data that led the individual to report, denounce or make public disclosure.

In the absence of these conditions, the Reports do not fall within the scope of the provisions of this procedure and therefore, the protection provided does not apply to those who report; similarly, the protection granted to those is excluded

different subjects, who due to the role assumed within the reporting process and/or the detail relationship that binds them to the Reporting Person, they indirectly suffer Retaliation.

7.5 SUPPORT MEASURES BY THIRD SECTOR ENTITIES

The list of Third Sector bodies that provide Reporting Persons with measures has been established at the ANAC support, consisting of free information, assistance and advice on how to Reporting and the protection from retaliation offered by national regulatory provisions and those of the European Union, on the rights of the Person Involved, as well as on the methods and conditions of access to the legal aid at state expense.

8. PROCESSING OF PERSONAL DATA

The Company is the Data Controller of the personal data processed in the context of the Reports referred to in this procedure.

Before sending the Report, the Reporting Person, the Person Involved and/or Mentioned and the Facilitators will receive information pursuant to articles. 13 and 14 of Regulation (EU) 2016/679 ("GDPR"). In particular, this information (Annex 1 of this document) will be:

- made available on the Company's websites;
- posted on the company notice board;
- delivered by the Report Management Committee in the event of a Report made during the course of the meeting specifically requested by the Reporter.

The Reports received by the Company, together with the attached deeds and documents, will be retained for time necessary to manage them and, in any case, as required by law, for a non-period exceeding five years from the date of communication of the relevant final results.

According to the provisions of the art. 2-undecies Legislative Decree. 196/2003 the Person Involved and/or Mentioned in the reporting, with reference to your personal data processed in the context of the Report, cannot exercise the rights that the GDPR normally recognizes to interested parties (the right of access to

personal data, the right to rectify them, the right to obtain their cancellation or so-called right to be forgotten, the right to limitation of processing, the right to portability of personal data and the right to object to processing). This in as the exercise of these rights could result in an effective and concrete prejudice to the protection of confidentiality of the identity of the Reporting Person.

In such cases, the Person Involved and/or Mentioned as interested in the processing will be able to exercise the aforementioned rights by contacting the Guarantor Authority for the Protection of Personal Data, in the prescribed manner from the art. 160 of Legislative Decree. 196/2003. In this case, the Guarantor for the Protection of Personal Data informs the interested party to have carried out all the necessary checks or to have carried out a review, as well as of the right of the interested party to lodge a judicial appeal.

9. RESPONSIBILITIES OF THE REPORTING PERSON

Without prejudice to the specific limitations of liability provided by the legislator, the protection provided in the event of Retaliation does not apply in the event of a finding with a sentence, even if not final, at first instance against the Reporting Person of criminal liability for the crimes of slander or defamation or in any case for the same crimes connected to the report, or civil liability, for having reported false information reported intentionally with malice or negligence.

In cases of ascertainment of the aforementioned responsibilities, a sanction must also be applied to the Reporting Person disciplinary on the basis of the provisions of the law and company regulations on the matter.

They are also a source of responsibility, in disciplinary matters and, if the conditions are met, in other settings competent authorities, any forms of abuse of this procedure, such as Reports manifestly unfounded and/or carried out for the sole purpose of damaging the reported person or other subjects, and any other hypothesis of use improper or intentional exploitation of the procedure itself.

10. CONSEQUENCES OF THE REPORT FOR THE PERSON INVOLVED

If the Company deems the Report to be founded, without prejudice to any other remedy and right of law may initiate disciplinary proceedings against the Person Involved pursuant to the CCNL applied and relevant company regulations.

Furthermore, the Company may communicate the facts covered by the Report to the competent authorities by reporting complaints, complaints, promoting legal actions and so on.

11. EFFECTIVENESS AND PUBLICITY

This document comes into force from 12/17/2023 In order to guarantee the knowledge of the channel, the procedures and the conditions for making the Reports, This document is displayed, in paper copy, on the company noticeboard and is published in electronic format, on the Company's website.

ANNEX 1 – INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PERSONS WHO REPORT VIOLATIONS OF LAW OF THE EUROPEAN UNION OR NATIONAL REGULATORY PROVISIONS, OF THE PERSONS INVOLVED, OF THE PERSONS MENTIONED AND OF THE FACILITATORS A&G S.r.l., as data controller of personal data (hereinafter “A&G S.r.l.”), issues this information to the Reporting Person, to the Persons Involved or mentioned and to the Facilitators in compliance with European and Italian regulations regarding the protection of personal data.

PURPOSE AND LEGAL BASIS OF THE PROCESSING.

A&G S.r.l. processes personal data for the purpose of carrying out the necessary investigative activities aimed at verification of the validity of the fact being reported and the adoption of consequent measures.

Consent is not required because the processing is necessary for the fulfilment of regulatory obligations which weigh on A&G S.r.l. based on the provisions of the Legislative Decree. 10 March 2023, n. 24.

DATA CATEGORIES AND THEIR SOURCES.

A&G S.r.l. processes data of a common nature (name, surname, qualification, etc.), data of a particular nature (data relating to health, trade union membership, etc.) and/or data relating to criminal convictions, crimes and measures of security: this information can be collected directly from the person to whom it is sent report (hereinafter "Interested Party") and/or to third parties (e.g. when the Reporting Person provides information about the person involved and/or other people mentioned and/or the facilitator, or when in During the investigation, further information/official documents are acquired from other structures A&G S.r.l.).

CONSERVATION PERIOD OF COLLECTED DATA.

The data collected is kept for the time necessary to process the report and for the period necessary for the completion of the related administrative procedure or any legal proceedings initiated and, in any case, no later than 5 years from the date of communication of the final outcome of the reporting procedure.

NATURE OF THE PROVISION OF DATA AND CONSEQUENCES IN THE EVENT OF REFUSAL.

The provision of personal data is optional, but necessary for the management of reports and messages related activities, with the consequence that any refusal prevents us from proceeding in this direction.

CATEGORIES OF RECIPIENTS.

During the management of the report, personal data may be processed by internal figures specifically authorized for the purposes indicated, as well as to service providers or other external parties (e.g. managers of platforms used for the management of reports), who will process the data as data controllers on behalf of

A&G S.r.l. If the conditions exist, the personal data may be transmitted to third parties to whom the communication is made is required by law (e.g. Judicial Authority, National Anti-Corruption Authority, etc.). Under no circumstances will personal data be disclosed.

DATA TRANSFER TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANIZATION

Personal data is not transferred either to non-European third countries or to organisations international.

RIGHTS OF INTERESTED PARTIES.

Interested parties have the right to obtain access to their personal data, updating (or rectification, if inaccurate), the cancellation of the same or the limitation of the processing that concerns them, upon occurrence of the respective ones conditions and in particular within the limits of the provisions of the art. 2-undecies of the Legislative Decree. n. 196/2003.

To exercise their rights, the interested party can use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the person responsible for managing the report, by contacting the same via the channel used for the report, i.e. at Grand Hotel Villa Itria, with registered office in Via Aniante, 3, 95029 Viagrande (CT). The interested party also has the right to lodge a complaint with the competent supervisory authority in the matter, Guarantor for the protection of personal data (www.garanteprivacy.it).