



PROCEDURE FOR
REPORTING BREACHES

Italian Legislative
Decree 24, 10 March
2023 transposing
Directive (EU)
2019/1937 on the so-
called “whistleblowing”

INDEX

1. Foreword	2
2. Objective	2
3. Regulatory references and definitions	3
4. Scope	4
4.1 The Whistleblower	4
4.2 Subject and content of the Report	5
4.2.1 Subject of the Report.....	5
4.2.2 Content of the Report.....	6
4.2.3 Anonymous Report.....	6
4.2.4 Exclusions	7
5. The internal Reporting channel	7
5.1 The WB Platform	7
6. Addressee of the Report	8
6.1 Reports received from outside the corporate channel	8
7. Handling Internal Reports	8
7.1 Receipt and preliminary checks.....	9
7.2 Investigation	9
7.3 Feedback to Whistleblower.....	10
7.4 Outcome and summary report.....	10
8. Confidentiality of the Whistleblower’s identity	11
8.1 Confidentiality in the internal management process.....	11
8.2 Confidentiality in disciplinary proceedings	11
8.3 Confidentiality in criminal proceedings.....	12
9. Protection Measures	12
9.1 Conditions for protection	12
9.2 Extension of protection	12
9.3 Ban on Retaliation	13
9.4 Reporting retaliatory conduct	14
9.5 Limitations of liability	14
9.6 Support measures	15
9.7 Waivers and settlements.....	15
9.8 Cases of lost protection.....	15
10. Reported Party protection.....	15
11. Personal data processing.....	16
12. External Report.....	16
12.1 External Report.....	16
13. Liability and sanctions	17
14. Traceability and archiving.....	18
15. Adoption, dissemination and training	18

1. Foreword

Piovan S.p.A. and Piovan Group companies (hereinafter also “**PIOVAN**”) undertake to conduct their business ethically, honestly and with integrity, in compliance with the applicable laws across the regions where they conduct their operations and in accordance with the values expressed in the Code of Ethics.

PIOVAN promotes a corporate environment where breaches of the law and/or conduct deemed unlawful or inconsistent with Piovan Group’s principles and values set out in the Code of Ethics, can be reported without any adverse consequences of any kind.

Reports of breaches can help promptly identify and address critical issues and risks to which the companies and stakeholders are potentially exposed by taking suitable preventive and countermeasures.

With this in mind, PIOVAN has long implemented a series of internal channels for reporting unlawful conduct. Said channels are designed to protect the confidentiality of the whistleblower’s identity and of all parties deemed deserving of protection, thus avoiding retaliatory behaviour or any form of discrimination towards them on account of the report.

Legislative Decree 24 of 10 March 2023 transposed Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law.

The aim of the regulation is to strengthen the legal protection afforded to persons who report breaches of national or European law, which harm the interests and/or integrity of the organisation (public or private) to which they belong, and which they become aware of during the course of their work.

PIOVAN, in addition to the measures already implemented at Group level, has established a dedicated reporting system available to its Italian companies in compliance with Legislative Decree 24 of 10 March 2023 and of Legislative Decree 231 of 8 June 2001, on the administrative liability of organisations.

2. Objective

This procedure (hereinafter also “**Procedure**”) regulates the system for the submission, receipt and management of Reports falling under the scope of Italian Legislative Decree 24, 10 March 2023.

For anything not expressly indicated in this Procedure, the provisions of the aforementioned Italian Legislative Decree 24 of 10 March 2023 shall remain fully applicable.

This Procedure applies to Piovan Group’s Italian companies.

3. Regulatory references and definitions

ANAC	<i>Autorità Nazionale Anticorruzione</i> (Italian National Anti-Corruption Authority)
231 Model	Organisation, Management and Control Model pursuant to L.D. 231/2001
Anonymous Report	A Report devoid of the elements allowing its author to be identified
Breaches	Conduct, acts or omissions that harm the public interest or integrity of the public administration or of a Piovan Group Company, as better defined in § 4.2 of this Procedure.
BoD	Board of Directors
CCNL	Applicable <i>Contratto Collettivo Nazionale di Lavoro</i> (National Collective Agreement)
Code of Ethics	Piovan Code of Ethics, implemented at Group level
Decree 24/23	Italian Legislative Decree 24 of 10 March 2023, "Implementation of Directive (EU) 1937/2019 on the protection of persons who report breaches of Union law and containing provisions on the protection of persons who report breaches of national regulatory provisions"
Directive EU 1937/2019	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
External Report	Written or verbal communication with Information on Breaches, submitted through the external reporting channel activated by ANAC
GDPR	Regulation (EU) 2016/679 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 (General Data Protection Regulation)"
Information on Breaches	Information, including well-founded suspicions, concerning Breaches committed or which, based on factual elements, may have been committed in one of the Piovan Group Companies, as well as elements concerning conduct aimed at covering up said Breaches, as better defined in § 4.2.2 of this Procedure
Internal Report	Written or verbal communication with Information on Breaches, submitted through the internal reporting channel: WB Platform
L.D. 231/2001	Italian Legislative Decree 231 of 8 June 2001 regulating "The administrative liability of legal persons, companies and associations even without a legal personality"
Ordinary Report	Written or verbal communication regarding conduct that does not comply with the principles of ethics, integrity and transparency set out in the Code of Ethics or in other policies and guidelines implemented by Piovan Group, the subject of which are breaches that do not fall under the scope of application of this Procedure but which should nonetheless be examined by the Ethics Committee and addressed in compliance with the Group's guidelines (" WB Guidelines ")
Piovan Group Companies or Companies	Piovan Group Italian companies
Privacy Code	Italian Legislative Decree 196/2003 supplemented by Italian Legislative Decree 101, 10 August 2018

Report	Written or verbal communication with Information on Breaches, as better defined in § 4.2 of this Procedure
Retaliation	Any conduct, act or omission, whether attempted or threatened, stemming from the Report or reports to Judicial or Accounting authorities, which directly or indirectly results or could result in unjust harm to the whistleblower or the person submitting the report. For examples of retaliatory measures, see § 9.3
SB	Supervisory Board pursuant to L.D. 231/2001
TFEU	Treaty on the Functioning of the European Union
Whistleblower	The natural person that submits a Report with Information on Breaches, acquired during the course of its work as better defined in § 4.1 of this Procedure

4. Scope

4.1 The Whistleblower

This Procedure applies to persons who make Reports of Breaches of which they become aware during the course of their work and committed in the Piovan Group Companies with which they have or have had legal dealings in the capacity of:

- subordinate workers, including therein holders of a part-time, full-time or intermittent employment relationship, on a fixed-term, open-ended, temporary, apprenticeship, ancillary or casual basis;
- self-employed persons, including therein holders of work contracts, agency, sales and other types of collaborative relations;
- workers or collaborators who provide goods or services or who perform works for Piovan Group Companies;
- freelancers and consultants;
- volunteers and trainees, both paid and unpaid;
- shareholders and persons with administrative, executive, control, supervisory or representative roles, even if said roles were exercised on a merely de facto basis (i.e. without formal investiture)

(hereinafter “**Whistleblower**” or “**Whistleblowers**”).

The Protection Measures referred to in this Procedure shall always apply during the employment or legal relationship with a Piovan Group Company, as well as in cases where the employment or legal relationship has not yet commenced (e.g. candidates), during the trial period, and following the termination of the employment or legal relationship if the information was acquired during said relationship.

4.2 Subject and content of the Report

4.2.1 Subject of the Report

The Report shall relate to breaches of national or European regulatory provisions and conduct, acts or omissions that harm the public interest or integrity of Piovan Group Companies, of which the Whistleblowers become aware during the course of their work (hereinafter also “Breaches”), i.e.:

4.2.1.1 Breaches of national regulatory provisions

- unlawful conduct pursuant to L.D. 231/2001
- breaches of Models 231 implemented by Piovan Group Companies
- other breaches of laws or regulations applicable to Piovan Group Companies

4.2.1.2 Breaches of European law¹

- a. breaches falling within the scope of the relative acts of the European Union, for example but not limited to the following areas:
 - public procurement
 - financial services, products and markets
 - prevention of money laundering and terrorist financing
 - product safety and compliance
 - transport safety
 - protection of the environment
 - radiation protection and nuclear safety
 - food and feed safety and animal health and welfare
 - public health
 - consumer protection
 - protection of privacy and personal data, and security of network and information systems;
- b. acts or omissions affecting the financial interests of the European Union (Art. 325, TFEU) fight against fraud and illegal activities affecting the financial interests of the EU) as identified in the regulations, directives, decisions, recommendations and opinions of the EU;

¹ The regulatory provisions outlined above (and listed in Annex 1 of Decree 24/23) “are to be understood as a dynamic reference insofar as they must be naturally adapted to changes in the regulation itself” (Confindustria Operating Guide, Art. 1.2).

- c. acts or omissions concerning the internal market, which compromise the free circulation of goods, persons, services and capital (Art. 26(2), TFEU), including breaches:
- of EU competition and State aid rules and rules of corporate tax or arrangements the purpose of which is to obtain a tax advantage that defeats the objective or purpose of the applicable corporate tax law;
- d. acts or conduct that nullify the objective or purpose of the provisions of the European Union in the fields indicated in points a, b, and c *supra*.

4.2.2 Content of the Report

Reports must be substantiated and verifiable. It is important to provide information useful in ascertaining the facts and identifying the parties to whom the Breaches may be attributed, including well-founded suspicions regarding Breaches already committed or not yet committed (but which, based on factual elements, could be committed), as well as any conduct aimed at concealing them (e.g. concealment or destruction of evidence), etc. (hereinafter also “**Information**”). The following must be clearly indicated:

- the details of the person submitting the Report, including their qualification, professional role and address for possible future follow-up in accordance with this Procedure; this is, however, without prejudice to the possibility of submitting an Anonymous Report (see § 4.2.3);
- a clear and full description of the unlawful conduct subject of the Report and how the Whistleblower came to be aware of it;
- the date and place where the fact occurred;
- the name and role (qualification, professional role or department in which the activity is carried out) making it possible to identify the person(s) allegedly responsible for the reported facts.

Where possible, the Report must be accompanied by suitable supporting documentation (i.e.: any documentation aimed at verifying the validity of the reported facts), the indication of any other parties potentially aware of the facts and any other information useful in investigating the reported facts.

4.2.3 Anonymous Report

PIOVAN, in view of the Protection Measures in place to protect the Whistleblower, encourages a so-called “nominative” Report (i.e. whereby the Whistleblower is identified) in order to facilitate the investigations and verify the validity of the facts.

An Anonymous Report, that is, devoid of elements allowing the identification of its author, shall be managed, to the extent possible, in accordance with this Procedure or the WB Guidelines, provided it is sufficiently substantiated and able to bring to light actual facts and situations.

If the anonymous Whistleblower is subsequently identified and becomes the target of Retaliation, he/she shall be guaranteed the Protection Measures provided for by this Procedure if the conditions set out in § 9.1 are met.

4.2.4 Exclusions

This Procedure does not include reports:

- pertaining to personal interests of the Whistleblower, specifically regarding their individual employment relations, that is, concerning matters involving their hierarchical superiors (e.g.: labour disputes, discrimination, interpersonal conflicts between colleagues, reports on data processing carried out in the context of individual work relations without affecting the public interest and/or the integrity of Piovan Group Companies and/or the public administration);
- on matters of national security and defence;
- concerning breaches that are already regulated on a mandatory basis in certain specific industries (i.e.: financial services, prevention of money laundering, terrorism, transport safety, environmental protection);
- relating to facts, information and documents, that are subject to confidentiality provisions related to medical confidentiality, judicial investigation secrecy, or lawyer-client privilege, prohibiting their disclosure or dissemination.

Reports that are baseless, clearly unfounded, based on mere suspicion, indiscretions or rumours are strictly prohibited. Likewise, reports made in bad faith, with wilful misconduct or gross negligence, or concerning Breaches already known to the public, are also prohibited.

It is also prohibited to use expressions that are insulting and/or detrimental to the honour and/or personal and/or professional decorum of the persons involved; to send reports for purely defamatory or slanderous purposes or with the sole aim of knowingly disseminating unfounded accusations; to send reports of a discriminatory nature insofar as referred to the reported person's sexual orientation, religious or political beliefs, racial or ethnic origin, etc.

5. The internal Reporting channel

5.1 The WB Platform

Internal Reporting can be done through the Piovan Group's web platform, which employs encryption tools to ensure the confidentiality of the Whistleblower's identity and of any third parties mentioned in the Report, as well as the content of the Report and relative documentation (hereinafter "**WB Platform**").

The WB Platform can be accessed at the following address:

<https://piovan.whistleblowing.biz/>

The Whistleblower can submit the Report in writing by filling in a guided form.

The Report can also be made verbally using the voice messaging system installed on the WB Platform or by means of a direct request to meet with the Ethics Committee, on the part of the Whistleblower. Such meeting will be traced in accordance with the procedures set out in § 14 “*Traceability and documentation*”.

6. Addressee of the Report

The body in charge of receiving and managing the Report is the autonomous and independent Piovan Group Ethics Committee, designated and appointed in compliance with the applicable Whistleblowing law (hereinafter, “**Ethics Committee**”).

In the event of Breaches involving unlawful conduct relevant pursuant to L.D. 231/2001 or Breaches of the 231 Models, the Ethics Committee can also involve the Supervisory Board of the relative Company.

The Ethics Committee, within the scope of its assigned powers and roles, shall manage the Report in accordance with principles of confidentiality, objectivity, independence, competence and professional diligence.

6.1 Reports received from outside the corporate channel

Anybody who receives a Report – incorrectly submitted to a person other than the Ethics Committee – is required to:

- contact the Ethics Committee as promptly as possible and in any case within 7 (seven) days of receiving such Report, in order to agree on the Report forwarding procedures;
- maintain absolute confidentiality regarding the information received, the identity of the Whistleblower, the Reported Party and any other persons involved, the content of the Report and any enclosed documents, refraining from mentioning them to anyone;
- if the incorrectly received Report was sent via email, it must be permanently deleted after being forwarded to the Ethics Committee, checking first to ensure that it has been effectively received by the latter.

7. Handling Internal Reports

The process for handling Internal Reports involves the following steps.

7.1 Receipt and preliminary checks

The Ethics Committee, having received the Report, i) notifies the Whistleblower that such Report has been received within seven days and ii) conducts a preliminary assessment on the feasibility and admissibility of the Report.

The Report is deemed **inadmissible** in the following cases:

- it is lacking the elements listed in § 4.2.2 “*Content of the Report*”;
- an inherent lack of factual basis for the Breaches mentioned in this Procedure;
- the presentation of facts with generic content, such that they cannot be understood by the Ethics Committee;
- the production of documentation only without reporting any actual Breaches;
- irrelevant or banned content pursuant to this Procedure (see § 4.2.4 *Exclusions*).

If the Report is not properly substantiated, the Ethics Committee may ask the Whistleblower for supplementary elements via the WB Platform or in person, if the Whistleblower has requested a face-to-face meeting.

If the Report is found to be infeasible or inadmissible, the Ethics Committee may:

- archive the report, giving notice to the Whistleblower via the WB Platform; or
- process the Report as an Ordinary Report and manage it in accordance with the procedures implemented by Piovani Group Companies or the WB Guidelines. In the latter case, the Ethics Committee, where possible, shall inform the Whistleblower of the bodies in charge of handling Ordinary Reports.

7.2 Investigation

Once the feasibility and admissibility of the Report has been assessed, the Ethics Committee commences the investigation in order that the reported facts can be effectively verified, ensuring timeliness and compliance with the principles of objectivity, competence and professional diligence.

The investigation is managed in such a way as to ensure the confidentiality of the Whistleblower’s identity and the acquired information.

The Ethics Committee may conduct the investigation directly or with the support and collaboration of the company's competent resources and, where necessary, in consultation with third parties whose involvement is key to ascertaining the validity of the Report.

The Ethics Committee may also involve or refer the investigation activities to the Supervisory Board of the Piovani Group Company implicated in the Report.

In the event of a conflict of interest – even if only apparent or potential – of any member of the Ethics Committee or a person involved in the investigation, the Committee shall remove said person from the activity and, if appropriate, inform the Supervisory Body of the relative Company or the Piovan S.p.A. Board of Directors if the conflict involves all members of the Ethics Committee.

Investigation and ascertainment activities may be suspended or interrupted at any time if elements emerge revealing the baseless nature of the facts outlined in the Report, or the wilful misconduct and bad faith of the Whistleblower.

7.3 Feedback to Whistleblower

Within three months from the date of receipt or, in the absence of such notice, within three months from the expiry of the 7-day deadline from the submission of the Report, the Ethics Committee provides feedback to the Whistleblower, e.g.: commencement of internal investigation and relative results, measures taken, etc. or of the archiving of the Report due to inadmissibility, baselessness, etc.

The feedback may be definitive if the investigation has terminated, or interlocutory if it is still in progress. The investigation must nonetheless be concluded within a reasonable period of time, depending on the subject matter and complexity of the Report and the relative investigation activities.

7.4 Outcome and summary report

Upon completion of the investigation, the Ethics Committee prepares a summary report on the investigations conducted and the resulting outcomes (“**Summary Report**”), accompanied, where relevant, by any remarks and/or recommendations aimed at resolving any organisational or control gaps, as well as any proposed disciplinary measures and/or Protection Measures, etc. (hereinafter “**Recommendations**”).

Otherwise, if upon the conclusion of the investigations, the substantiated elements are found to be insufficient, or the facts, conduct or omissions outlined in the Report are found to be baseless, the Ethics Committee shall archive the Report together with the relative reasoning.

The Summary Report is sent to:

- Administrative Body (e.g.: CEO, Managing Director or other delegated board member) of the implicated Company for any further actions that might be required to protect the Company;
- SB of the implicated Company, for breaches relevant pursuant to Decree 231;
- Board of Statutory Auditors or Single Statutory Auditor of the implicated Company, if relevant competence profiles have emerged.

The Administrative Body of the implicated Company, having reviewed the Summary Report, identifies the departments responsible for implementing the Recommendations formulated by the Ethics Committee and defines the course of action and time frames.

The Ethics Committee monitors the handling and effective implementation of the Recommendations.

8. Confidentiality of the Whistleblower's identity

8.1 Confidentiality in the internal management process

The Ethics Committee and any persons who, in any capacity whatsoever, become aware of a Report and/or are involved in the procedure for the receipt, management and ascertainment of an Internal Report, are required to maintain the utmost confidentiality with regard to the identity of the Whistleblower and the facts, persons and circumstances reported therein.

This requirement also applies to the executive bodies of the Piovan Group Company, which cannot order investigations or request information to determine the identity of the Whistleblower.

The confidentiality of the Whistleblower may not be respected when:

- the Whistleblower provides their express consent to disclose their identity;
- the Whistleblower may face criminal liability, even with a first-instance judgement, including for slander or defamation offences or for any offences committed with compliance to the judicial Authorities. Likewise, when civil liability arises in cases of wilful misconduct or gross negligence, in which case PIOVAN reserves the right to conduct investigations against the Whistleblower and take any necessary actions deemed appropriate.

8.2 Confidentiality in disciplinary proceedings

In **disciplinary proceeding** against the alleged perpetrator of the reported conduct:

- If the allegation of the disciplinary charge is founded on separate and additional investigations with respect to the Report, even if resulting from the latter, the Whistleblower's identity cannot be disclosed;
- If the allegation is based on the Report, either in whole or in part, and the Whistleblower's identity is essential for the defence of the accused person, or in any case of the person implicated in the Report, the Whistleblower's identity can only be disclosed with the express consent of the Whistleblower; in this case, the Whistleblower is notified in writing in advance of the reasons making it necessary to disclose the confidential information.

If the Whistleblower denies their consent, the Report cannot be used in the disciplinary proceeding which, therefore, cannot be implemented or continued in the absence of additional elements on which to base the allegation.

8.3 Confidentiality in criminal proceedings

If a criminal proceeding is initiated subsequent to the Report, the Whistleblower's identity shall be kept confidential in accordance with the provisions outlined in the Italian Code of Criminal Procedure and typically until the conclusion of the preliminary investigation stage (Art. 329 of the Italian Code of Criminal Procedure).

9. Protection Measures

9.1 Conditions for protection

The protection measures provided for by Decree 24/23 ("**Protection Measures**") apply when both of the following conditions are satisfied:

- at the time of the Report, the Whistleblower had reasonable grounds to believe that the Information on the reported Breaches was true and fell within the scope of application of Decree 24/23 and, therefore, included in the category of the Breaches as better defined in this Procedure; **and**
- the Report was made in accordance with the provisions of Decree 24/23, transposed in this Procedure.

Moreover, there must be a causal link between the Report and the Retaliation suffered.

9.2 Extension of protection

In order to avoid "cross-cutting" retaliatory conduct, the Protection Measures can also be extended to the following persons ("**Protected Persons**"):

- facilitators, i.e., those who assist the Whistleblower in the process of submitting the Report and whose assistance must be kept confidential;
- persons within the same work environment as the Whistleblower, with whom they have emotional ties, or relatives of the Whistleblower up to the fourth degree of kinship;
- the Whistleblower's co-workers who work in the same context as them and who have a regular and ongoing relationship with them;
- entities owned by the Whistleblower or for which such persons work, as well as entities that operate in the same work context as the above persons.

9.3 Ban on Retaliation

Any type of discrimination or Retaliation, even if only threatened, towards those who submit a Report in good faith and/or towards Protected Persons, for reasons directly or indirectly linked to the Report, is prohibited.

Acts of retaliation made in contravention of this prohibition are rendered null and void.

In legal or administrative proceedings, or any extrajudicial disputes regarding the assessment of any prohibited conduct, acts or omissions against the Whistleblower, it shall be presumed that such conduct, acts, or omissions were committed in response to the Report.

The burden of proving that said conduct or acts were motivated by reasons unrelated to the Report rests with those who commit them.

In the event of a claim for compensation presented to the judicial authority by the Whistleblower, if the latter demonstrates to have submitted a Report under the applicable law and to have suffered damage, it is presumed, unless proved otherwise, that the damage is a consequence of said Report.

Such retaliatory measures are listed below by way of example and not limited to:

- dismissal, suspension or equivalent measures;
- relegation in level or non-promotion;
- change of duties, change of workplace, reduction of salary, change of work hours;
- suspension from training or any restriction to its access;
- negative merit notes or negative references;
- the taking of disciplinary measures or other sanctions, including fines;
- coercion, intimidation, harassment or ostracism;
- discrimination or in any case unfavourable treatment;
- failed conversion from a fixed-term to open-ended employment contract, if the employee legitimately expected such conversion;
- failure to renew or early termination of a fixed-term employment contract;
- damage, even to the person's reputation, in particular on social media, or economic or financial harm, including loss of economic opportunities or loss of income;
- unfair inclusion in lists based on formal or informal market or industry agreements, which could make it impossible for the person to find work in the market or industry in the future;
- early termination or resolution of a supply or services contract;
- cancellation of a licence or permit;

- the request to undergo psychiatric or medical examinations.

9.4 Reporting retaliatory conduct

A Whistleblower who claims to have suffered Retaliation for having made a Report must provide detailed information regarding the discrimination or Retaliation to the Ethics Committee as soon as possible.

The adoption of retaliatory measures towards Whistleblowers and Protected Persons pursuant to this Procedure can be notified to ANAC - using a specific whistleblowing platform accessible from the corporate website - which must identify a causal link between the Retaliation and the Report and subsequently take the necessary measures.

9.5 Limitations of liability

In addition to the prohibition and protection against Retaliation referred to above, Decree 24/23 also sets out certain limitations on the liability of the Whistleblower, provided both of the following conditions are satisfied:

- at the time of disclosure or dissemination, there were reasonable grounds to believe that disclosure or dissemination of the information was necessary to reveal the Breach; **and**
- the Report was made in accordance with the conditions for protection set out above (§ 9.1), and in compliance with the provisions set out in Decree 24/23 and referred to in this Procedure.

In the instances outlined above, persons shall not face punishment for disclosing or disseminating, through their Report, information: i) on Breaches covered by the obligation of secrecy, excluding forensic and medical professional secrecy, classified information and the secrecy of judicial deliberations, which cannot be disclosed; ii) concerning copyright protection or personal data protection; and iii) that could damage the reputation of the person involved or reported.

Criminal and any other form of liability, whether civil or administrative, shall not be waived for conduct, acts or omissions: i) unrelated to the Report; ii) not strictly necessary to reveal the Breach; and iii) constituting unlawful acquisition of information or access to documents; conversely, the extraction of documents (copying, photographing or removal), to which one had lawful access shall not be subject to punishment.

This is without prejudice to the Whistleblower's potential criminal, civil or disciplinary liability in cases of slanderous or defamatory reporting, as outlined in the Italian Criminal Code and Art. 2043 of the Italian Civil Code.

9.6 Support measures

The Whistleblower may resort to Third Sector associations – the list of which is published on the ANAC corporate website – equipped to provide support, consultancy and information, entirely free of charge.

9.7 Waivers and settlements

Any waivers and settlements of rights and remedies as outlined in Decree 24/23 and referenced in this Procedure must take place in protected environments, (i.e. before a judge, following a mandatory attempt at conciliation, or through mediation and conciliation agreements facilitated by trade unions or certification bodies, etc.).

9.8 Cases of lost protection

The Protection Measures do not apply in instances where the Whistleblower's criminal liability for slander or defamation, or in any case, for offences committed with compliance, has been established, even through a first-instance judgement, or similarly if civil liability is established for wilful misconduct or gross negligence.

10. Reported Party protection

PIOVAN requires everybody to collaborate in upholding a corporate climate of mutual respect and does not tolerate conduct that may harm the dignity, honour and reputation of any individual.

The reported person ("**Reported Party**") shall not be subject to disciplinary sanctions in the absence of objective evidence in relation to the reported Breach, that is, without the facts outlined in the Report having been investigated, and without the Reported Party having had the chance to contest the charges in accordance with the procedures set out by law and/or contract.

The Ethics Committee and all parties howsoever involved in receiving and/or managing the Report must take all the necessary precautions to protect the confidentiality of the Reported Party, also in order to avoid prejudicial consequences, even if only in relation to their reputation, within the work environment where the Reported Party is placed.

The Reported Party may be heard or, on request, is heard by the Ethics Committee also by means of a document-based procedure through the acquisition of written and documented observations.

The Reported Party shall be protected without prejudice to any legal provisions imposing the obligation to disclose the Reported Party's name (e.g. requests from the Judicial authority, etc.).

11. Personal data processing

The process of receiving and managing Reports entails the processing of personal data, which is carried out and organised by Piovan S.p.A. and the Piovan Group Companies, individually in their capacity as Data Controller and jointly in their capacity as Joint Data Controllers, in compliance with current legislation and ensuring data subjects have the opportunity to exercise their rights, insofar as applicable to such processing, in accordance with Articles 15–22 of the GDPR.

The personal data contained in Reports is managed and regulated by agreements for joint data control between the Piovan Group Companies.

The relative data are processed by the Ethics Committee and/or by certain company departments and/or third-party consultants as better specified in § 7.2 above.

The internal members of the Ethics Committee are authorised to process personal data based on their specific letter of appointment specifying the duty of confidentiality that must be respected in fulfilling their assigned role.

The external member of the Ethics Committee is appointed as Data Processor pursuant to Art. 28 of the GDPR.

The supplier of the report management platform is similarly appointed as Data Processor pursuant to Art. 28 of the GDPR.

12. External Report

Decree 24/23 provides that Whistleblowers can use the external reporting channel activated at ANAC - National Anti-Corruption Authority (**External Reporting**) only under certain conditions, briefly summarised in the following sections.

The above is without prejudice to the faculty to make a report to the Judicial or Accounting Authorities in those cases where the Whistleblower is required to refer the matter to the competent Authorities, for example as part of their professional duties and responsibilities, or if the Breach constitutes a criminal offence.

12.1 External Report

Without prejudice to the preference for the Internal Reporting channel for Breaches relating to relevant unlawful conduct pursuant to L.D. 231/2001 and/or the 231 Models adopted by Piovan Group Companies, the Whistleblower can submit an External Report using the Whistleblowing channel established by ANAC, accessible via the corporate website, provided one of the following conditions are satisfied at the time of its submission:

- the internal Reporting channel is not active or, if active, is not compliant with the provisions of Decree 24/23;

- the Whistleblower has already submitted an Internal Report that has not been followed up;
- the Whistleblower has grounds to believe that if an Internal Report were made, it would not be effectively followed up or that such Report may entail the risk of Retaliation;
- the Whistleblower has grounds to believe that the Breach may constitute an imminent or obvious risk to the public interest.

External Reports submitted to an entity other than ANAC must be transmitted to the latter within 7 (seven) days of their receipt, providing simultaneous notification to the Whistleblower of such transmission.

13. Liability and sanctions

ANAC sanctions.

ANAC, without prejudice to other liability profiles, applies the following pecuniary sanctions to the responsible entity:

- a) from 10,000 to 50,000 euros when it is ascertained that retaliatory offences have been committed or when it is ascertained that the Report was obstructed or an attempt was made to obstruct the Report, or the duty of confidentiality has been violated;
- b) from 10,000 to 50,000 euros when it is ascertained that Reporting channels were not established, that procedures were not adopted for the submission and management of Reports or that the adopted procedures do not comply with those referred to in Articles 4 (“*Internal reporting channel*”) and 5 (“*Management of the internal reporting channel*”) of Decree 24/23, and also when it is ascertained that the received Reports have not been investigated and examined;
- c) from 500 to 2,500 euros when the criminal liability of the Whistleblower is ascertained, even through a first-instance judgement, for offences such as defamation or slander, or for similar offences committed with compliance to the Judicial or Accounting Authorities, or when their civil liability is ascertained due to wilful misconduct or gross negligence.

Disciplinary sanctions.

Without prejudice to any civil and criminal liability arising from breaches of the Whistleblowing law, the following are subject to disciplinary sanctions:

- Whistleblowers who intentionally or with gross negligence submit Reports subsequently found to be baseless or made in bad faith;
- corporate entities that take discriminatory or retaliatory measures against a Whistleblower;

- persons who obstruct or attempt to obstruct Reports;
- persons who exploit this procedure in a manipulative or instrumental manner, submitting Reports that are clearly opportunistic and/or intended solely to harm the Reported Party or others;
- persons who intentionally make improper or instrumental use of the Whistleblowing policy;
- the Ethics Committee in the event of failure to carry out investigative and examination activities;
- entities that fail to guarantee the general principles of protection with particular reference to maintaining the confidentiality of the Whistleblower's identity;
- the Reported Parties who, further to the outcome of the investigations carried out by the Company, are found to have acted unlawfully or illegitimately, or in non-compliance with the Code of Ethics, 231 Model and/or corporate procedures of a Piovan Group Company.

14. Traceability and archiving

Internal Reports and the relative documentation are kept for the time necessary to process the Report and in any case, for no more than five years from the date the final outcome of the procedure is communicated, without prejudice to the obligation for longer retention periods in the event, for example, of disciplinary proceedings.

Verbally submitted Internal Reports are documented and filed in compliance with legal provisions; specifically, when the Report is verbally submitted during a meeting on request of the Whistleblower, the Ethics Committee, with the consent of the Whistleblower, documents said Report by recording it on a suitable storage and listening device, or by preparing a written report, which is checked and confirmed by the Whistleblower by means of their signature.

15. Adoption, dissemination and training

This Procedure is adopted by Piovan S.p.A. and published on the corporate website and in a special section of the corporate intranet.

The Administrative Bodies of Piovan Group Companies, as part of their activities for compliance with Decree 24/23, transpose this Procedure and promote suitable training initiatives on Whistleblowing, in coordination with the Parent Company.

The Ethics Committee, if necessary and with the help of the responsible departments of the Piovan Group Companies, ensures the availability of clear information regarding the channel, procedures and requirements for submitting Internal Reports, as well as the channel, procedures and requirements for submitting External Reports.

This Procedure is periodically reviewed in order to ensure its efficacy and compliance with Whistleblowing legislation and best practices.

Procedure for Reporting Breaches.

PIOVAN S.p.A.

Via delle Industrie 16 – 30036

S. Maria di Sala Venice - Italy

