

FAVINI

WHISTLEBLOWING PROCEDURE pursuant to Legislative Decree 24/2023

Purpose and regulatory framework

The procedure regulates the receiving and processing reports (Whistleblowing) process and the managing methods of the related investigation, complying with the rules and regulation in force applicable to the subject and object of the report and to the protection of personal data. The reporting system here regulated implements the provisions of Legislative Decree 24/2023 (Whistleblowing Decree) and is also relevant for the purposes of Legislative Decree 231/2001; the reporting system also complies with the rules on the protection of personal data, European Regulation EU 2016/679 - GDPR and Privacy Rules.

The procedure was drawn up in accordance with the provisions of the Favini Code of Ethics and the Organisation, Management and Control Model adopted by the company pursuant to the Legislative Decree 231/2001.

Object and content of the Reports

Violations to be reported pursuant to the Whistleblowing Decree must concern behaviors, acts or omissions damaging the public interest or the integrity of a public administration or a private entity including companies of the Favini group.

Reports must be related to:

- 1) violation of the provisions of the Organization Model pursuant to Legislative Decree 231/2001 or the Code of Ethics;
- 2) violations of European Union law, relating to the following areas:
 - public procurement;
 - product services and financial markets and prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - transport safety;
 - environmental protection;
 - radiation protection and nuclear safety;
 - food and feed safety and animal health and welfare;
 - public health;
 - consumer protection;
 - protection of privacy and protection of personal data and security of networks and information systems;
- 3) acts or omissions detrimental to the financial interests of the European Union, as set out in the Whistleblowing Decree, and those affecting the internal market, including violations of European Union competition and state aid rules;
- 4) acts or practices frustrating the object or purpose of the provisions of the acts of the European Union in the above mentioned areas.

FAVINI

Unlawful conducts reported must concern situations, facts, circumstances of which the reporting person/Whistleblower may come directly aware by reason of his or her working relationship or collaboration with Favini S.r.l. and Cartotecnica Favini S.r.l.

The Addressees of the Procedure are therefore all those who, in various capacities, have employment or collaboration relations with the Companies, including trainees, collaborators, temporary workers, consultants, agents and suppliers.

Reports must be detailed and well-founded in order to allow for the appropriate investigations and remedial measures to be taken.

Management of the reports and related data processing is carried out by Favini S.r.l. also in the interest of its subsidiary company Cartotecnica Favini S.r.l., in compliance with the applicable legal provisions, including the Personal Data Protection Regulation (GDPR).

The Report can be performed:

- when the legal relationship/employment contract is ongoing;
- during the probationary period;
- when the legal relationship has not yet started, if information on breaches was acquired during the selection process or in other pre-contractual stages;
- after the termination of the legal relationship if the breach information was acquired before the termination of the legal relationship.

The Report shall contain:

- personal details of the whistleblower, indicating the position or function held in the Company;
- clear and complete description of the facts that are the subject of the Report, as well as the time and place where they occurred;
- generalities or other identifying elements that make it possible to identify the person who committed the violation and the possible indication of other persons who can report on the facts that are the subject of the Report;
- any documents in support of the Report and any other information that may be useful for investigating the breach.

Internal reporting channel

As a matter of priority and in compliance with the provisions of the Whistleblowing Decree, Whistleblowers are encouraged to use the internal channel activated by the Company, which by means of a specific platform allows written reports to be sent electronically and guarantees, also by means of encryption tools, the confidentiality of the identity of the Whistleblower, the person involved and the persons mentioned in the Report, as well as the content and the relevant documentation.

The internal reporting channel can be reached directly from the Company's website or at the following link:

<https://whistleblowing.favini.com/>

FAVINI

Anonymous Whistleblowing Reports are allowed. The platform allows the Whistleblower to remain in contact with the Report Recipient during the handling of the report by providing clarifications and/or additions through a messaging system preserving anonymity.

The other reporting channels for the Report Recipient are:

- by written mail (ordinary or registered mail with acknowledgement of receipt addressed to the Report Recipient) bearing on the outside the words "for the attention of the Whistleblowing Report Recipient - confidential - personal" to the address of the Company's registered office or through the dedicated e-mail box whistleblowingcmservizi@gmail.com;
- hand delivery in a sealed envelope addressed to the Whistleblowing Reporting Recipient to the address of the Company's registered office marked "confidential - personal".

Recipient of the internal reporting channel

The Company has identified an independent and specifically trained external person as the Recipient of Reports.

Internal reporting management

Upon receipt of the Report, the Reporting Recipient shall

- a) within 7 days from the date of receipt, issue the Whistleblower with an acknowledgement of receipt of the Report;
- b) preliminarily examine the content of the Report, also with the support of the corporate management, in order to determine its relevance;
- c) archive the Report if it is deemed not eligible, as for instance in cases of clear groundlessness, lack of elements relating to the breaches envisaged, generic or inappropriate content, or lack of documentation;
- d) in the event of an eligible Report, involve the company management and/or the supervisory body (the internal supervisory body responsible for carrying out compliance activities and supervising the operation of and compliance with the Model pursuant to the Legislative Decree 231/2001), depending on the subject of the Report, and take charge of its management. Acknowledgement of the Report must be made within 90 days/3 months from the date of receipt of the report.

Reports and related documentation are kept for as long as needed for their processing, and in any case no longer than 5 years from the date of the communication of the final outcome of the Report handling process.

FAVINI

Internal investigation, management and closure of the Report

The Report Recipient may carry out the appropriate investigations directly or through persons internal or external to the company. If a breach has been ascertained, the Report Recipient shall involve the company management and/or the supervisory body (the internal supervisory body responsible for carrying out compliance activities and supervising the operation of and compliance with the Model pursuant to the Legislative Decree 231/2001), in the assessment and take charge of the handling of the Report.

In handling the Report, the Report Recipient shall perform the following activities:

- a) maintain contact with the reporting person/Whistleblower, requesting any additions;
- b) follow up the Reports received;
- c) give feedback on the Reports within 3 months from the date of acknowledgement of receipt of the Report, or failing acknowledgement of receipt, within 3 months from the expiry of the 7-day period from the submission of the Report.

The evidence gathered during the investigation is analysed to understand the context of the Report, to establish a breach under the Procedure and to identify disciplinary and appropriate measures to remedy the situation and/or avoid future repetitions.

Having ascertained the breach, the Company, also with the support of the supervisory body (the internal supervisory body responsible for carrying out compliance activities and supervising the operation of and compliance with the Model pursuant to the Legislative Decree 231/2001) shall

- 1) proceed to initiate a sanction proceeding against the person involved, in compliance with the applicable legislation, collective bargaining agreements and the Model pursuant to the Legislative Decree 231/2001;
- 2) agree with the corporate function concerned by the violation, or with the Board of Statutory Auditors if concerned by particular Reports, on an improvement action for the removal of the control weaknesses detected or other initiatives, ensuring the monitoring of the situation.

Communication of results and reports

The results of the management of the Reports received and not filed, including the checks carried out and the provisions adopted, shall be summarized in a periodical (annual) report to be addressed to the general management. The supervisory body (the internal supervisory body responsible for carrying out compliance activities and supervising the operation of and compliance with the Model pursuant to the Legislative Decree 231/2001), within the periodic communication provided for by the Model pursuant to the Legislative Decree 231/2001, shall provide the company's administrative body with a report on the Reports received and not filed, including the results of the analyses and any disciplinary measures taken.

FAVINI

Measures to protect the Whistleblower

Reports must be made in good faith, it remains the criminal liability of the Whistleblower in the event that the Report constitutes an offence of slander or defamation or other offences, without prejudice to the cases of non-punishability set out in the Whistleblowing Decree referred to below. The Whistleblowing Decree provides for the following protection measures in respect of the Whistleblower and connected persons (facilitators, persons of the same background as the Whistleblower bound by a stable emotional or family relationship up to the fourth degree, the Whistleblower's work colleagues with a regular and current relationship, entities owned by the Whistleblower or for which the Whistleblower works or which operate in the same work context):

- prohibition of retaliation following a Whistleblowing;
- support measures such as information, assistance, free advice from entities from the list available on the ANAC website on how to report and on the legislation in favour of the Whistleblower and of the involved person;
- protection from retaliation, which includes
 - possibility of communicating to ANAC the retaliation one believes to have suffered as a result of a Whistleblowing;
 - provision for the nullity of acts taken in breach of the prohibition of retaliation, to be enforced also before the courts;
- limitation of liability in the event of disclosure or dissemination of violations covered by the obligation of secrecy or relating to protection of copyright or personal data protection, or of information on violations detrimental to the reputation of the person involved or reported if
 - at the time of disclosure, or dissemination, there were reasonable grounds to believe that disclosure was necessary to disclose the infringement, and
 - the conditions of the following paragraph "Conditions for the application of protective measures" existed;
- limitations of liability, unless the act constitutes a criminal offence, for the acquisition of or access to information on breaches.

Conditions for the application of protective measures

The above listed protection measures apply to the Whistleblower and connected persons provided that

- a) at the time of the Report, the person making the Report had good reason to believe that the information on the reported violations was true and within the scope of the Whistleblowing Decree;
- b) the Report is made in accordance with the provisions of the Whistleblowing Decree.

The protection measures may also apply in the case of anonymous Whistleblowing, if the Whistleblower is subsequently identified and retaliated against.

In particular, retaliation means the cases provided for in Article 17 of the Whistleblowing Decree, including the following cases:

- a) dismissal, suspension or equivalent measures;
- b) change of duties;
- c) non-renewal or early termination of a fixed-term employment contract;
- d) discrimination or otherwise unfavorable treatment;
- e) early termination or cancellation of a contract for the supply of goods or services.

FAVINI

Confidentiality obligations concerning the identity of the Whistleblower

In addition to the confidentiality obligations provided for by the Whistleblowing Decree, it is emphasised that the identity of the Whistleblower and any other information, from which such identity may be deducted even indirectly, may not be disclosed, without the express consent of the Whistleblower, to persons other than those competent to receive or follow up the reports and expressly authorised to process such data.

External reporting channel

The Whistleblower may proceed with an external Report through the ANAC website in respect of offences falling within the scope of EU or national acts relating to the areas listed in points 2-3-4 in the previous paragraph 'Object and content of the Reports'.

External Reporting to the ANAC can only take place if:

- the internal reporting channel defined by the Procedure is inactive;
- the Whistleblower has already made a Report to the internal channel and it has not been followed up;
- the Whistleblower has well-founded reasons to believe that an internal Report would not be followed up or could lead to a risk of retaliation;
- the Whistleblower has justified reason to believe that the breach to be reported may constitute a clear or imminent danger to the public interest.

For the use of this external reporting channel or the use of public disclosure, please refer to the guidelines and the official ANAC website.

The above does not apply in cases of Code of Ethics reporting.

Personal data processing

Any processing of personal data under the Procedure must be carried out in accordance with the GDPR regulation and the Privacy Code.

Personal data that are not useful for the processing of a specific Report shall not be collected, or if accidentally collected, shall be immediately deleted .

The exercise of the data subject's rights and freedoms (art. 15-22 GDPR), in case the data subject is the involved person, may not be exercised (with a complaint under the GDPR) if this would result in concrete prejudice to the confidentiality of the identity of the Reporting Person/Whistleblower and/or the pursuit of the objectives of compliance with the legislation on unlawful conduct.

The processing of personal data relating to the receipt and management of reports is carried out by the Company as the data controller, in compliance with the principles of the GDPR and providing information to the Whistleblower and the persons involved as well as adopting appropriate measures to protect the rights and freedoms of the persons concerned. To this end, the Company provides appropriate information on the processing of personal data.

The Company also, in accordance with the provisions of the Whistleblowing Decree and in compliance with the GDPR, identifies suitable technical and organizational measures to

FAVINI

guarantee an adequate level of security for the specific risks arising from the processing performed, on the basis of a data protection impact assessment, regulating the relationship with any external suppliers that process personal data on its behalf (data processors).

Information and training

The Procedure shall be initiated by uploading it on the corporate website and any other tool deemed appropriate.

The Company promotes communication, information and training activities relating to the Procedure in order to ensure its most effective application and the widest knowledge of the rules on Reporting, operation and access to the channels and measures applicable in the event of breaches.

Eugenio Eger
Chief Executive Officer

