

WHISTLEBLOWING POLICY (summary)

The following are the main topics covered in the Whistleblowing Policy adopted STELIAU TECHNOLOGY ITALY S.P.A., to which reference is made for completeness of information.

1. PREMISE

STELIAU TECHNOLOGY ITALY S.P.A. guarantees a work environment in which it is possible to freely report any illegitimate behavior that may have taken place within the Company.

2. WHO CAN REPORT?

Can make reports:

- a) employees of private sector entities;
- b) self-employed workers;
- c) workers and collaborators supplying goods or services or carrying out works for third parties;
- d) freelance professionals and consultants; d) volunteers and trainees;
- e) shareholders and persons with administrative, management, control, supervisory or representative functions.

The above-mentioned persons may also make reports:

- when the legal relationship has not yet started, if information on breaches has been acquired during the selection process or in other pre-contractual stages;
- during the probationary period;
- after the termination of the legal relationship, if information on breaches was acquired during the course of the relationship.

3. WHAT CAN BE REPORTED?

Conduct, acts or omissions detrimental to the public interest or the integrity of the private entity and consisting of:

- 1) offences falling within the scope of European Union or national acts relating to the following fields:
 - public procurement;
 - services, products 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;
- 2) acts or omissions affecting the financial interests of the European Union, as referred to in Article 325 of the Treaty on the Functioning of the European Union;
- 3) acts or omissions relating to the internal market, as referred to in Article 26(2) of the Treaty on the Functioning of the European Union;
- 4) acts or conduct that frustrate the object or purpose of the provisions of the acts of the European Union in the areas mentioned above.

4. INTERNAL REPORTING CHANNELS ACTIVATED BY STELIAU TECHNOLOGY ITALY S.P.A.

4.1 HOW TO MAKE A REPORT?

Form of the channel (written or oral)	Description of the reporting channel	Link/address	Report Recipient	Report Manager
Written	On-line platform: ParrotWB	https://steliau.parrotwb.app/	"Team Whistleblowing of Labor Project S.r.l."	"Team Whistleblowing of Labor Project S.r.l."
Written	Ordinary mail	<u>Team Whistleblowing di Labor Project</u> <u>c/o Labor Project S.r.l.</u> <u>Via Brianza, n. 65 – 22063</u> <u>Cantù (CO)</u>	"Team Whistleblowing of Labor Project S.r.l."	"Team Whistleblowing of Labor Project S.r.l."

refer to the annexes to the Whistleblowing Policy for instructions on the use of internal reporting channels.

4.2 CONTENT OF THE REPORT

- the circumstances of time and place in which the reported fact occurred;
- the description of the fact;

- the personal details or other elements enabling identification of the person to whom the reported facts are to be attributed.

4.3 REPORT MANAGEMENT PROCESS

- **receipt of reports:** once the report is received, the "Whistleblowing Team of Labor Project S.r.l." proceeds to record it in the appropriate register. Within 7 (seven) days of receipt of the report, a notice of receipt is issued to the whistleblower;
- **preliminary analysis of the reports:** aimed at verifying the "admissibility" of the report. If positive, it will proceed to the next stage, otherwise, the report will be archived;
- **investigation phase** (investigation of reports): specific analyses are initiated, including through the involvement of other relevant company figures and, if necessary, requesting additional information from the whistleblower;
- **closure of the reports:** filing of the report or sending the report to the relevant internal bodies or judicial authorities for possible action taken. Within 3 (three) months from the date of the notice of receipt or, in the absence of such notice, within 3 (three) months from the expiration of the period of 7 (seven) days from the submission of the report, the report manager will provide feedback to the whistleblower.

5. ADDITIONAL REPORTING CHANNELS

- External reporting channel activated by ANAC: portal accessible at the following link <https://servizi.anticorruzione.it/segnalazioni/#/#%2F>;
- Public disclosure;
- Reporting to the judicial authority.

6. PROTECTION OF THE WHISTLEBLOWER

- **CONFIDENTIALITY:** confidentiality of the identity of the reporting person, the person involved and the person otherwise mentioned in the report, as well as the contents of the report and related documentation
- **PROTECTION MEASURES:** any form of retaliation against the whistleblower is prohibited (e.g., any dismissal imposed as a result of the report is null and void)

- **SUPPORT MEASURES:** ANAC website publishes a list of Third Sector entities that provide reporting persons with support measures consisting of information, assistance and advice on:
 - ways of reporting,
 - protection from retaliation,
 - rights of the person involved,
 - modalities and conditions of access to legal aid.