

WHISTLEBLOWING PROCEDURE

SUMMARY

1. FOREWORD	2
2. PURPOSE AND AIM OF THE PROCEDURE	2
3. DEFINITIONS	3
4. SUBJECT OF THE REPORT	5
5. CONTENT OF REPORTS	6
6. REPORTS BY INTERNAL CHANNEL	7
6.1. Ways and Means of Reporting	7
6.2. Management of Reporting	7
6.3. The outcome of the Report	9
6.4. Filing of Reports	10
7. ANAC EXTERNAL REPORTING CHANNEL	10
8. PUBLIC DISCLOSURES	11
9. FORMS OF PROTECTION FOR THE REPORTER	11
9.1. Obligations of confidentiality on the identity of the Whistleblower and withholding of the Whistleblower's right of access	12
9.2. Prohibition of discrimination and retaliatory measures against the reporter	13
10. WHISTLEBLOWER'S RESPONSIBILITIES	15
11. DATA PROTECTION	15
12. DISCIPLINARY SYSTEM	16
13. TRAINING AND INFORMATION	16

1. FOREWORD

Tethis S.p.A. (hereinafter also "**Tethis**" or the "**Company**") in compliance with Legislative Decree 231/2001, which governs the administrative liability of entities, has adopted an Organization, Management and Control Model (hereinafter also "**Model 231**"), described in the SOP_QHS_12 Modello Organizzativo.

Tethis has also adopted this "*Whistleblowing Procedure*" (hereinafter the "**Procedure**") in order to comply with the new features introduced by Legislative Decree No. 24 of March 10, 2023, published in G.U. 63 of March 15, 2023 on "*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 on the protection of persons who report breaches of Union law and on provisions concerning the protection of persons who report breaches of national laws*" (so-called **Whistleblowing**).

Legislative Decree 24/2023 repealed and amended the previous national discipline, encapsulating in a single regulatory text - also for the private sector - the regime for the protection of individuals who report unlawful conduct put in place in violation not only of European provisions, but also national ones, provided they are based on well-founded reasons and detrimental to the public interest or the integrity of the entity, in order to ensure the transposition of the directive without retreating in the protections already recognized in our system.

2. PURPOSE AND AIM OF THE PROCEDURE

The purpose of the Procedure is to provide recipients, as will be better specified below, who intend to report an offence or anomaly with clear operational indications about the object, content and mode of transmission of Reports, as well as with reference to appropriate forms of protection and sanctions.

This Procedure, in addition to regulating the procedures for reporting wrongdoing and the way Reports are handled, has as additional objectives:

- i. Ensure the cooperation of persons internal and external to the Company in the Reporting of offenses covered by the Decree and related regulations, including offense attempts, and additional offenses as explicated in Legislative Decree 24/2023;
- ii. protect by identifying and as far as possible eliminating risks associated with activities that may harm its value;
- iii. Identify subjects and ways of carrying out conduct contrary to the pursuit of social goals;

- iv. protect the individuals who make Reports (hereinafter also "**Whistleblower**"), providing them with support measures and protection from retaliation or, in case of unfounded or instrumental Reports, the most appropriate sanctioning mechanisms;
- v. prevent or minimize the risk of committing crimes in violation of the provisions contained in Model 231;
- vi. identify and where appropriate correct conduct that is *non-compliant* with the law and company rules (e.g., procedures, operating instructions, policies, best practices, etc.).

3. DEFINITIONS

For the purposes of this Procedure:

Work context	Work or professional activities, present or past, through which, regardless of the nature of such activities, a person acquires information about violations and in the context of which he or she could risk retaliation in the event of a Public Reporting or Disclosure or a report to the judicial or accounting authority. The work context includes times when the work relationship has not yet begun, if information about violations was acquired during the selection process or other pre-contractual stages, the probationary period, and the time after the legal relationship is terminated if information about violations was acquired during the course of the relationship.
Public Disclosure	Communication of information about violations through print or electronic media or otherwise through means of dissemination capable of reaching a large number of people.
Facilitator	The natural person who assists the Whistleblower in the Whistleblowing procedure, connected to the Whistleblower by a work link.
Reporting Manager	The function or person(s) formally appointed by the Company and having the requirements of professionalism, impartiality and honorability, capable of guaranteeing the confidentiality of the information acquired by virtue of the appointment. The Manager receives, analyzes and verifies Reports.
Person mentioned	The natural or legal person mentioned in the Report as a person anyway implicated in the reported violation.
Potential Whistleblower	Subject who can make Reports: <ul style="list-style-type: none"> • Shareholders and persons with functions of administration, management, control, supervision or representation, even when such functions are exercised on a mere de facto basis; • suppliers, contractors and related subcontractors and sub-subcontractors; • Workers;

	<ul style="list-style-type: none"> • Self-employed and collaborators; • free professionals and consultants; • workers with atypical contracts (part-time contract, fixed-term contract); • workers with an employment relationship with a temporary agency; • volunteers and interns, paid and unpaid; • persons whose employment relationship has not yet begun, in cases where information regarding the violation was acquired during the selection process or in the pre-contractual stages; • workers or collaborators during the probationary period; • reporting persons if, after the termination of the employment relationship, information on violations was acquired during the course of the relationship; • External parties who enter into relations with the Company for business reasons.
Whistleblower	The individual who makes the Report or public disclosure of information acquired as part of his/her work context.
Reported Person	The natural or legal person mentioned in the Report as the person to whom the violation is attributed.
Report	Breach disclosure.
External signaling	Communication of information about the violation made through the External Reporting channel.
Internal reporting	Communication of information about the violation made through the Internal Reporting channel.
Illicit Reporting	Reports that falsely report a fact for the mere purpose of harming the Reported Person or Reports through which the Whistleblower, who participated jointly with other individuals in the irregular behavior, seeks to secure some sort of "immunity" from future disciplinary action or even Reports through which the Whistleblower seeks to use the reported issue as a possible bargaining tool to obtain the reduction, or exclusion, of a previous disciplinary sanction or to obtain benefits (e.g. bonuses, promotions) within the organization, and Reports that contain allegations that the Whistleblower knows to be false and that, in general, are used to resolve mere personal issues.
Violation	<p>Behavior (of which the Whistleblower has become aware within the work context) that constitutes:</p> <p>(a) <u>Violations of national regulatory provisions:</u></p> <ul style="list-style-type: none"> • criminal, civil, administrative or accounting offenses other than those specifically identified as Violations of EU law, as defined below. These violations include the offenses that constitute base for the administrative liability of entities under Legislative Decree 231/01 and the requirements of Model 231.

	<p>(b) <u>Violations of European regulations:</u></p> <ul style="list-style-type: none"> • offenses within the scope of relevant EU acts relating to public procurement, services, products and financial markets, prevention of money laundering, product safety and compliance, transportation safety, environmental protection, food and feed safety, animal health and welfare, public health, consumer protection, protection of life and protection of personal data, and security of networks and information systems; • Acts or omissions affecting the financial interests of the EU; • Acts or omissions concerning the internal market that impair the free movement of goods, persons, services and capital; • Acts or conduct that nullify the object or purpose of the provisions of the European Union in the areas indicated in the above points.
--	---

4. SUBJECT OF THE REPORT

Reports may relate to Violations as defined in paragraph 3, as well as any anomaly or misalignment regarding conduct of company personnel that does not comply with the requirements of the 231 Model or any other internal regulation.

Reported misconduct must relate to situations of which the person has become directly aware by reason of the employment relationship and includes news acquired on the occasion of and/or because of the performance of work duties, even in a casual manner.

The following topics cannot be the subject of Reporting:

- disputes, claims, or demands related to an interest of a personal nature that relate exclusively to individual labor relations, or labor relations with hierarchically subordinate figures;
- disputes based on mere suspicions or rumors, as it is necessary both to take into account the interest of third parties who are the subject of the information reported in the Report and to prevent the institution from carrying out unhelpful and otherwise wasteful internal inspection activities;
- grievances of a personal nature of the Whistleblower or inherent in claims/claims that fall under the discipline of the employment relationship;
- National security and defense violations.

5. CONTENT OF REPORTS

Reports should be as detailed as possible and offer as much evidence as possible to enable the Reporting Manager to make the necessary verifications.

To this end, each Report, with the exception of anonymous ones, must contain the following elements:

- Generalities of the person making the Report, including the position or function held within the company;
- A clear and complete description of the facts that are the subject of Reporting;
- if known, the circumstances of time and place under which they were committed;
- if known, the generalities or other elements (such as the function held within the company and the service in which he/she performs the activity) that would allow the identification of the person(s) who has/have carried out the reported facts;
- An indication of any other persons who may report on the facts that are the subject of Reporting;
- The indication of any documents/other evidence that can confirm the substantiation of these facts;
- Any other information that may provide useful evidence about the existence of the reported facts.

If the Whistleblower wishes to consent to the disclosure of his or her identity, he or she may expressly formalize such consent already within the Report.

Tethis also consents to the receipt of anonymous Reports, i.e., without elements that allow the identity of the Whistleblower to be identified, as long as they are adequately substantiated and documented, although this could make the verification and/or ascertainment of the facts that are the subject of the Report more difficult. Nevertheless, in this case:

- Anonymous Reports should be substantiated and, where appropriate, supported by appropriate documentation;
- the internal channel adopted by the Company (see point 6) allows interlocution with the anonymous Whistleblower;
- protection measures will still be applied to the anonymous Whistleblower if, despite the anonymous report, the identity of the person emerges from the circumstances or the person is later identified.

	WHISTLEBLOWING PROCEDURE	
SOP_QHS_15	Rev 02	Page 7 by 16

6. REPORTS BY INTERNAL CHANNEL

6.1. Ways and Means of Reporting

To handle Reports, Tethis has two internal written Reporting channels.

The first is an IT channel that consists of the "*MyWhistleblowing*" portal (hereafter the "**Portal**"), available in the "*Whistleblowing Reporting System*" section of the corporate website www.tethis-lab.com or at the following link: <https://areariservata.mygovernance.it/#!/WB/Tethis>

The Instructions for Use of the "*MyWhistleblowing*" portal are contained within the "*MyWhistleblowing Instruction Manual*" attached to this procedure.

Alternatively, in the event of inability to use the Platform, it is possible to use the second Internal Reporting Channel set up by the Company, by sending by ordinary mail a written communication to the attention of Francesco Rubino, Attorney at Law, at the address Piazza Eleonora Duse n. 2, 20122, Milan.

In this case, it is required to place the documents in double sealed envelopes, without any indication of the sender, marked "CONFIDENTIAL - TO THE REPORTING MANAGER."

Written Reports, received either by Portal or by regular mail, are visible only to Francesco Rubino who has been formally appointed by the Company to perform the functions of the Reporting Manager.

For the purpose of processing the personal data contained in the Reports, the Reporting Manager is qualified as an authorized processing subject under Article 29 of the GDPR and 2-quaterdecies of the Privacy Code.

The Reporting Manager, in carrying out his functions may be assisted by Company Departments/Functions/Offices involved in the Reporting and/or External Consultants, taking care in all cases to avoid the occurrence of potential conflicts of interest.

6.2. Management of Reporting

The handling of the Report received through one of the internal Channels mentioned above follows the following steps:

- 1. Receipt of the Report** - Upon receipt of a Report, the Reporting Manager sends an acknowledgement of receipt of the Report to the Whistleblower, either through the Platform or using the contact details indicated in the Report made by regular mail, within a maximum of 7 days. In this context, the Reporting Manager may also request

the Whistleblower to be contacted again to acquire additional elements useful for the investigation.

In the case of Anonymous Reporting, such confirmation is only possible if the Platform has been used.

2. **Preliminary Verification** - The management and preliminary verification of the merits of the circumstances represented in the Report are entrusted to the Reporting Manager, who shall do so, in accordance with the principles of impartiality and confidentiality, by carrying out any activity deemed appropriate, including the personal hearing of the Whistleblower, where it is identified or can be identified, and of any other persons who may report on the facts reported.

The objective of the preliminary verification is to assess:

- a) **Manageability of the Report:** in order to initiate the procedure, the Reporting Manager must verify the existence of the objective and subjective prerequisites for the application of the Procedure and, specifically, that the Whistleblower is a person entitled to make the Report and that the subject of the Report falls within the scope of the discipline.
- b) **Admissibility of the Report:** for the Report to be admissible, it is necessary that, in the Report, it is clear (i) the circumstances of time and place in which the fact that is the subject of the Report occurred and, therefore, a description of the facts that are the subject of the Report, which must contain details regarding the events and, where present, also the manner in which the Whistleblower became aware of the facts; (ii) the generalities or other elements that allow for the identification of the person to whom the reported facts are attributed.

If the Report concerns a matter excluded from the object scope, it will not be dealt with according to the discipline enshrined in the Procedure, and the Whistleblower will be notified of this circumstance.

If the Report is found to be unmanageable or inadmissible, the Reporting Manager may proceed to dismiss the Report, while still ensuring the traceability of the supporting reasons and notifying the Whistleblower.

3. **Initiation of Internal Investigations** - In the event of a positive outcome of the preliminary verification, the Reporting Manager shall proceed to initiate internal audits and investigations to gather further detailed information and verify the substantiation of the reported facts through direct verification or through the assistance of external consultants or appropriately qualified internal personnel.

To this end, the Reporting Manager may avail himself of the support and cooperation of any Company Departments/Functions/Offices involved in the Reporting and/or external consultants, taking care to obscure any type of data that could allow the identification of the Whistleblower or any other Person Mentioned.

In such a case, the Company will make the necessary *privacy* designations from time to time.

4. **Report writing** - The investigation phase concludes with the writing of an appropriate *report*, which formalizes the background of the Report, the verification activities carried out and the related results/observations obtained. The *report* also proposes actions to be taken in relation to each observation/remark formulated.
5. **Responding to the Whistleblower** - Regardless of the outcome of the investigation (see Section 7.4) the Reporting Manager shall, within a period of three months from the delivery of the certificate of receipt of the Report to the Whistleblower, report to the Whistleblower on the merits of the facts that are the subject of the Report and any measures taken or to be taken. Where the certificate of receipt has not been delivered to the Whistleblower, the three-month period shall run from the seventh day after the receipt of the Report. However, where the internal investigation has not yet been completed, the acknowledgement will not disclose information to the Whistleblower that may affect ongoing investigations or affect the rights of third parties. In the latter case, the Whistleblower will receive a further and subsequent communication containing the final outcome of the investigation once it is completed.

6.3. The outcome of the Report

➤ Positive outcome of the Report - the Violation is established

If, as a result of the verification, the violation is found to have occurred:

1. The Reporting Manager shall communicate the outcome of the investigation to the hierarchical superior of the author of the ascertained violation, sharing the *report* prepared, so that appropriate action may be taken in accordance with the current internal sanctions system. If the Reported Person coincides with the person to whom the outcome is to be communicated, the Reporting Manager shall inform the hierarchically superior officer or, as a last resort, the Chairman of the Board of Directors.
2. The Board of Directors of the Company, upon the report of the Chief Executive Officer or the Chairman of the Board of Directors, shall decide on the adoption of disciplinary measures compatible with the professional relationship existing with the Reported Person;
3. The Chief Executive Officer of the Company will submit to the Board of Directors the consideration of whether to file a legal complaint against the Person Involved.

➤ Insufficient outcome of the Report - Violation cannot be ascertained

If, upon verification, the Violation cannot be ascertained, the Reporting Manager will file the *report* by notifying the Whistleblower and keeping track of the reasons for archiving within the appropriate *report*.

➤ Negative outcome of the Report - Violation is unfounded, false or instrumental

If, upon verification, the violation is found to be totally unfounded, false or instrumental:

1. The Reporting Manager shall notify the Chief Executive Officer of the outcome of the investigation by attaching the relevant *report* for appropriate action to be taken against the Whistleblower;
2. The Board of Directors, upon the report of the Chief Executive Officer, resolves to take measures compatible with the professional relationship the Company has established with the Whistleblower where the Whistleblower is found to be in bad faith and therefore the Report is unlawful;
3. At the express request of the Reported Person, the Reporting Manager shall provide the information in its possession, refraining from transmitting any information that could directly and/or indirectly trace the identity of the Whistleblower;
4. The Reporting Manager shall provide information regarding the identity of the Whistleblower and all documentation in its possession only in the event of an express request made by the Judicial Authority that may be proceeding.

6.4. Archiving of Reports

The outcomes of the assessments of all Reports received are assembled into an *ad hoc* report that will be reported on a periodic basis to the Company's Board of Directors.

Reports and related documentation must be appropriately archived in electronic and/or paper format, depending on the available medium, by the Reporting Manager and will be retained only until the conclusion of the Reporting procedure and in any case no longer than five years from the date of the communication of the final outcome of the Reporting procedure. Personal data manifestly not useful for the handling of a specific Report shall not be collected or, if accidentally collected, shall be deleted immediately.

The Reporting Manager also compiles, files and maintains, for equal time, a Register of Reports on an annual basis, divided into two separate sections depending on whether the Report is successful, unsuccessful or insufficient.

7. ANAC EXTERNAL REPORTING CHANNEL

The Whistleblower may submit a Report through the External Reporting channel established by ANAC in the following cases:

- a Report was made through the Internal Reporting channel, but the Report was either not followed up or ended in a negative action;

- he/she has reasonable grounds to believe that the internal Reporting would not be followed up, or that it could result in a high risk of retaliation (e.g., where there is a conflict of interest on the part of the Reporting Manager because the Report directly or indirectly involves him and, as a result, it cannot be assured that the Report through an internal channel will be effectively followed up);
- considers that the violation could pose an imminent or obvious danger to the public interest.

Violations as defined in paragraph 3 may be reported through External Reporting channel.

8. PUBLIC DISCLOSURES

The Whistleblower may proceed with a public disclosure in the following cases:

- has already submitted an Internal and External Report or directly an External Report and there has been no response;
- has probable cause to believe that the violation may constitute imminent or obvious danger to the public interest;
- has good reason to believe that the External Reporting may result in risk of retaliation or no follow-up.

Violations as defined in Section 3 may be reported by public disclosure.

9. FORMS OF PROTECTION FOR THE WHISTLEBLOWER

The protections identified in Legislative Decree 24/2023 apply to all Potential Whistleblowers, as defined above, who make a Report, as well as:

- shareholders and persons with functions of administration, management, control, supervision or representation, even if such functions are exercised on a de facto basis;
- suppliers, contractors and related sub-suppliers and sub-contractors;
- employed workers;
- self-employed and collaborators;
- freelancers and consultants;
- workers with atypical contracts (part-time contract, fixed-term contract);
- workers with an employment relationship with a temporary agency;
- volunteers and trainees, paid and unpaid;
- persons whose employment relationship has not yet begun, in cases where information regarding the Breach was acquired during the selection process or in the pre-contractual stages;
- workers or collaborators during the probationary period;

- whistleblowers if, after the termination of the employment relationship, information on violations was acquired in the course of the relationship;
- external parties who enter into relations with the Company for business reasons;
- whistleblowing facilitators;
- persons from the same Work Context and/or co-workers of the Whistleblower or the person who:
 - filed a complaint with the judicial or accounting authority;
 - or carried out a Public Disclosure;
- persons who are related to them by a stable affective or kinship link within the fourth degree and/or who work in the same Work Context as the same person and who have a habitual and current relationship with said person;
- entities owned by the Whistleblower or the person who filed a complaint with the judicial or accounting authorities or made a Public Disclosure or for which the same persons work, as well as entities that operate in the same Work Context as the aforementioned persons;
- (all together, the "**Protected Subjects**").

9.1. Obligations of confidentiality on the identity of the Whistleblower and withholding of the Whistleblower's right of access

Tethis and the Reporting Manager guarantee the confidentiality of the identity of the Whistleblower, the persons involved and the persons otherwise mentioned in the Report, as well as the content of the Report itself and its supporting documentation. In this regard, the aforementioned information will be known and will remain known only to the Reporting Manager and/or any other persons involved in the handling of the Report pursuant to this Procedure.

Reports may not be used beyond what is necessary to adequately follow up on them.

With the exception of cases in which criminal liability can be configured as slander and defamation under Articles 368 and 595 of the Criminal Code or civil liability under Article 2043 of the Civil Code and cases in which anonymity is not enforceable by law (e.g., in the case of execution of criminal investigations), the identity of the Whistleblower and any information from which his or her identity can be derived, is protected in any context subsequent to the Reporting. The identity of the Whistleblower and documentation in the possession of the Company will be shared only upon express request by the prosecuting Judicial Authority.

Within the framework of criminal proceedings, the identity of the Whistleblower is covered by secrecy in the manner and within the limits provided for in Article 329 of the Code of Criminal Procedure.

In proceedings before the Court of Accounts, the identity of the Whistleblower may not be revealed until the conclusion of the investigative stage.

With regard to the scope of disciplinary proceedings in particular, the identity of the Whistleblower may not be disclosed where the allegation of the disciplinary charge is based on investigations separate and additional to the Whistleblowing, even if consequent to the Whistleblowing. Instead, the identity of the Whistleblower may be revealed to the disciplinary authority and the accused only in cases where:

- there is the express consent of the Whistleblower;
- the contestation of the disciplinary charge is based, in whole or in part, on the Report and the knowledge of the identity of the Whistleblower is absolutely essential to the defense of the accused, provided that this circumstance is inferred and proven by the latter at the hearing or through the presentation of documentation produced for defense purposes.

The identity of the Whistleblower and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the Whistleblower's express consent, to persons other than those competent to receive or act upon Reports.

Violation of the duty of confidentiality is a source of disciplinary liability, without prejudice to additional forms of liability provided for by law.

9.2. Prohibition of discrimination and retaliatory measures against the Whistleblower

With respect to the Whistleblower who makes a Report under this Procedure, no form of retaliation or discriminatory measures, direct or indirect, affecting working conditions for reasons directly or indirectly related to the Report shall be allowed or tolerated.

Retaliatory or discriminatory measures include but are not limited to:

- dismissal, suspension or equivalent measures;
- grade demotion or non-promotion;
- change of duties, change of workplace, reduction of salary, change of working hours;
- suspension of training or any restriction of access to it;
- negative merit notes or negative references;
- adoption of disciplinary measures or other sanction, including fines;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavorable treatment;
- failure to convert a fixed-term employment contract to a permanent employment contract where the employee had a legitimate expectation of said conversion;
- non-renewal or early termination of a fixed-term employment contract;

- damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- inclusion on improper lists on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- early termination or cancellation of the contract for the provision of goods or services;
- cancellation of a license or permit;
- request for submission to psychiatric or medical examinations.

Any dismissal resulting from a Whistleblowing Report, a report to the judicial or accounting authorities, or a public disclosure made under the Whistleblowing regulations shall be null and void.

All waivers and settlements involving the rights and protections provided for in L.D. 24/2023 are invalid, unless they are made in the form and manner set forth in Article 2113 of the Civil Code.

An employee who believes that he or she has been discriminated against because he or she has made a Report must give detailed notice of the discrimination that has occurred to the Reporting Manager, who, after assessing the existence of the elements, will report the hypothesis of discrimination to the hierarchical superior of the employee who is the author of the alleged discrimination so that the appropriateness/necessity of taking acts or measures aimed at restoring the situation and/or aimed at remedying the negative effects of the discrimination through administrative means and the existence of the elements for initiating disciplinary proceedings against the employee who is the author of the discrimination can be assessed in a timely manner.

The adoption of discriminatory measures against Whistleblowers may be reported to the ANAC, which will proceed by informing the National Labor Inspectorate.

The prohibition against retaliation applies only if (i) the Whistleblower had reasonable grounds to believe that the information about the Violations that were the subject of the Reporting, Whistleblowing or Disclosure was true, and (ii) the Reporting, Whistleblowing or Disclosure was made in accordance with the regulations set forth in Legislative Decree 24/2023.

It should be noted that in the case of Public Disclosure, if the Whistleblower has not disclosed his or her identity and resorts to a pseudonym or *nickname*, ANAC will treat the Disclosure in the same way as an anonymous Disclosure and will take care to record it, for the purpose of preserving the identity of the Whistleblower, to ensure that the Whistleblower himself or herself is protected against retaliation in the event of subsequent disclosure of the Whistleblower's identity.

10. WHISTLEBLOWER'S RESPONSIBILITIES

This Procedure is without prejudice to the Whistleblower's criminal and disciplinary liability in the event of Reporting in bad faith under the Criminal Code and Article 2043 of the Civil Code.

Any forms of abuse, such as Illicit Reports insofar as they are manifestly opportunistic and/or made for the sole purpose of harming the Reported Person or others, and any other hypothesis of improper use or intentional instrumentalization of the institution that is the subject of this Procedure, are also a source of liability in disciplinary and other competent fora.

11. DATA PROTECTION

All processing of personal data carried out during the process of handling Reports shall be carried out in full compliance with data protection regulations and internal policies and procedures, particularly with reference to those on the processing and protection of personal data.

The processing of personal data will be limited to what is strictly necessary to implement the obligations set forth in Legislative Decree 24/2023 and will be carried out by the Reporting Manager (and any additional parties involved in the Reporting process) for the sole purpose of managing and following up on Reports.

The manner in which personal data is processed during the Whistleblowing management process is specified within the Privacy Policy - Whistleblowing Data Processing.

The Reporting Manager shall, in addition, comply with the specific instructions provided by Tethis in the act of designating him/her as an authorized processor.

Specifically, in handling Reports, the Reporting Manager shall ensure that:

- personal data contained in Reports be used no longer than necessary to adequately follow up on them;
- personal data manifestly not useful for the processing of the Report are not collected and, in case of accidental collection, are promptly deleted;
- personal data are kept in a form that allows the identification of the Whistleblower and other individuals involved for a period of time not exceeding the achievement of the purposes for which they are processed and, in any case, no longer than 5 years from the communication of the final outcome of the Reporting;
- specific technical and organizational measures are adopted and maintained to ensure a level of security appropriate to the specific risks of the processing. To this end, the Reporting Manager may draw on the necessary support of both the Platform provider and Tethis' IT manager;

- the individuals involved in the Reporting Management process are all duly authorized, educated and specifically trained individuals, with particular reference to security measures and the protection of the confidentiality of the individuals involved and the information contained in the Reports. The Reporting Manager may disclose the identity of the Whistleblower, or any other information from which such identity may be directly or indirectly inferred, to any third party other than the Whistleblower (e.g., consultants to be involved in the management of the Whistleblowing), only with the express consent of the Whistleblower.
- the personal data contained in the Reports are communicated to the corporate bodies and internal functions from time to time competent as well as to the Judicial Authority and/or any other competent authority, or to duly authorized third parties, for the sole purpose of activating the necessary procedures to ensure, as a result of the Report, appropriate judicial and/or disciplinary protection against the Reported Person, where from the elements collected and the measures taken it emerges that the circumstances reported are well-founded;
- paper and/or computer files (i.e., the Platform) are used for tracking, storing and filing Reports in compliance with the instructions set forth in this Procedure in accordance with the highest standards of security and confidentiality in force from time to time.

12. DISCIPLINARY SYSTEM

This Procedure is an integral part of Tethis' Model 231. Failure to comply with the principles and rules contained herein is therefore a violation of said Model 231.

Specifically, effective and proportional sanctions will also be adopted against those who violate the protection of the Whistleblower and as many effective, proportional and dissuasive sanctions of those who make, with malice or gross negligence, Illegal Reports.

13. TRAINING AND INFORMATION

Tethis organizes training sessions aimed at internal staff, to create appropriate awareness about the purposes and protections recognized by Legislative Decree 24/23, as well as a culture of integrity and responsibility within the Company.

Finally, awareness of the discipline contained in this procedure is ensured by sharing the document in the following ways:

- Publication on the Society's website;
- Forwarding emails to employees;
- Posting a copy of the procedure on a special bulletin board in the Company's common area.