



Policy on the System for Reporting
Unlawful Conduct
(So-called Whistleblowing)

Approved by the Board of Directors of Fonderie Cortiana Cav. Bortolo S.p.A. on _____.

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1. Introduction

In light of the changes introduced by Legislative Decree No. 24/2023 (the so-called “whistleblowing” decree, adopted to implement in Italy EU Directive 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons reporting on breaches of Union law and laying down provisions regarding the protection of persons reporting on breaches of national law), **Fonderie Cortiana Cav. Bortolo S.p.A.** (hereinafter also referred to as “**Fonderie Cortiana**” or “**the Company**”), through the adoption of this policy (hereinafter also referred to as the “**Policy**”), intends to establish the criteria and rules that allow Reporters to report potential and/or actual violations of national and/or European Union regulations of which they have become aware in the course of their work.

Furthermore, the Policy describes the operation of the reporting management and whistleblower protection system (hereinafter also referred to as the “**Whistleblowing System**”) implemented by **Fonderie Cortiana**. This Whistleblowing System provides for:

- specific, autonomous, and independent channels that differ from ordinary reporting channels and that guarantee the confidentiality and protection of personal data for both the Whistleblower and the Subject of the Report;
- specific procedures for receiving, processing, and managing reports that ensure independence in evaluation as well as complete transparency and traceability of the process followed;
- protection of the Whistleblower against the risk of direct or indirect retaliation, or any other unfair treatment resulting from the Report.

Furthermore, it is specified that, in the event the reported individual is found liable, they are protected from any further negative repercussions other than those provided for by the disciplinary measures adopted and are also held harmless if, following the investigations resulting from the report, no evidence of wrongdoing is found against them.

The Policy also provides information regarding the external reporting channels established by the National Anti-Corruption Authority (hereinafter also “**ANAC**”), pursuant to Legislative Decree No. 24 of March 10, 2023.

2. Definitions

A. Recipients: this refers to the legal representatives, shareholders, directors, executives, employees (regardless of the legal and contractual nature of their employment, including interns and volunteers), and members of the supervisory bodies of **Fonderie Cortiana**, as well as third parties—natural or legal persons—who have contractual relationships with the Company and/or, in any case, anyone acting in the name, on behalf of, or in the interest of the Company. In particular, this includes all persons referred to in Article 3 of Legislative Decree No. 24/2023.

B. Facilitators: these are individuals who work in the same workplace as the Whistleblower (as defined below) and who have provided or are providing assistance to the Whistleblower in the reporting process.

C. Whistleblowing Manager: this is the person responsible for managing the internal reporting systems, whose duties and functions are described in more detail in § 4.2 below.

D. Whistleblower(s): refers to the natural person(s) who is/are authorized to file a Report regarding potential and/or actual violations of which they have become aware by virtue of the duties performed in the context of the Company’s activities.

Pursuant to current legislation, the following may file a Report:

- employees, including those whose employment relationship is governed by Legislative Decree No. 81/2015. These include, for example, part-time and temporary employment relationships intermittent, fixed-term, temporary agency, apprenticeship, and occasional work;
- workers who perform occasional services;
- self-employed individuals who carry out their work at the Company;
- employees or contractors who carry out their work at the Company;
- freelancers and consultants who provide their services at the Company;
- volunteers and interns, whether paid or unpaid, who perform their work at the Company;

- shareholders and persons holding administrative, managerial, supervisory, or representative roles at the Company, even if such roles are exercised de facto.

It should be noted that Reports may also be filed by Reporters: (i) when the legal relationship has not yet begun, if information regarding the violations was obtained during the selection process or other pre-contractual stages; (ii) during the probationary period; (iii) after the termination of the employment relationship, if information regarding the violations was obtained during the course of the employment relationship.

E. Reported Party: refers to the natural or legal person mentioned in the Report as the person to whom the violation is attributed or as a person otherwise involved in the reported violation.

F. Internal Report: refers to any communication—made through the reporting channels governed by the Policy—concerning a reasonable and legitimate suspicion or knowledge of unlawful conduct, acts, or omissions as described in paragraph 4 below—“Subject Matter and Content of Reports”—committed by Fonderie Cortiana personnel and which harm the public interest or the integrity of the Company.

G. External Report: a report submitted through the channels managed by ANAC, which the Reporting Party may use under the conditions set forth in Article 6 of Legislative Decree 24/2023.

H. Fonderie Cortiana Personnel: refers to all legal representatives, shareholders, directors, executives, employees (regardless of the legal and contractual nature of their employment, including interns), and members of the Company’s supervisory bodies.

I. Violations: refers to conduct, acts, or omissions in violation of regulations pertaining to whistleblowing. In particular, by way of example only, Whistleblowers are entitled to report:

- a) unlawful conduct as defined by Legislative Decree No. 231 of June 8, 2001;
- b) violations of the organizational, management, and control models pursuant to Legislative Decree No. 231/2001;
- c) violations of European Union restrictive measures.

3. Relevant Legislation

- a) Law No. 300/1970 containing “*Provisions on the protection of workers’ freedom and dignity, freedom of association, and union activities in the workplace, and provisions on employment placement*”;
- b) Law No. 287/1990 containing “*Provisions for the protection of competition and the market*”;
- c) Legislative Decree No. 231/2001 containing “*Regulations on the administrative liability of legal entities, companies, and associations, including those without legal personality*”;
- d) Law No. 179/2017 on “*Provisions for the protection of persons reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship*”;
- e) Legislative Decree No. 101/2018 “*Provisions for the adaptation of national legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, 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)*”;
- f) EU Regulation 679/2019 “*General Data Protection Regulation*” and Legislative Decree No. 196/2003 “*Code regarding the protection of personal data*” – Amendment to Legislative Decree No. 101/18;
- g) Legislative Decree No. 24/2023 “*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting on breaches of Union law and laying down provisions regarding the protection of individuals who report violations of national regulations*”;
- h) ANAC Guidelines approved by Resolution No. 311 of July 12, 2023, “*regarding the protection of individuals who report violations of Union law and the protection of individuals who report violations of national regulations. Procedures for the submission and handling of external reports.*”
- i) ANAC Guidelines approved by Resolutions No. 478 and No. 479 of November 26, 2025 “*regarding whistleblowing through internal reporting channels.*”

4. Roles and Responsibilities

4.1. Administrative Body

The Administrative Body:

- approves the Policy;
- appoints the Whistleblowing Manager;
- receives periodic reports (at least annually) from the Whistleblowing Manager.

Furthermore, in the event that, during the course of the investigation, liability on the part of the Reported Party is established, the Whistleblowing Manager shall inform the Administrative Body, as well as the relevant company departments (e.g., human resources, legal department), of the relevant findings in order to assess whether to initiate disciplinary proceedings to identify and apply the disciplinary actions to be taken. In particular, the Administrative Body or the relevant corporate department shall initiate the disciplinary proceedings in accordance with and for the purposes of the provisions set forth in Law No. 300/1970 (the so-called “Workers’ Statute”) and subsequent amendments and additions, as well as other applicable laws and regulations in this regard.

4.2. Whistleblowing Manager

The Whistleblowing Manager is the person responsible for the internal reporting systems. This person performs their duties by ensuring the maintenance of the necessary conditions of independence and the required objectivity, competence, and professional diligence.

Specifically, the Whistleblowing Manager:

- ensures that the investigation process for received Reports is conducted in accordance with the principles defined in the Policy;
- analyzes reports and conducts the necessary preliminary investigation to assess the severity and validity of the reported facts;
- prepares an annual report on the proper functioning of the internal whistleblowing procedure, as well as on the results of the activities carried out in response to the reports received, while respecting the identity of the whistleblower; this report is shared with the Board of Directors so that it may monitor the functioning of the whistleblowing system implemented by the Company.

In carrying out their duties, the Whistleblowing Officer will comply with the relevant regulations, as further detailed in § 8 below.

The management of **Fonderie Cortiana’s** reporting channel is entrusted to the law firm Casa & Associati, with registered office at Via Cengio 15, 36100 Vicenza.

4.2.1. Conflict of Interest of the Whistleblowing Manager

If, during the assessment of the report and/or the conduct of the preliminary investigation, the Channel Manager finds themselves in a conflict of interest because they are the reporting party, the subject of the report, or otherwise involved in the report, they shall acknowledge receipt and promptly forward the report to the Supervisory Body (Board of Statutory Auditors), refraining from any further or subsequent action.

In the event that the substitute also finds themselves in one of the above-mentioned situations of conflict of interest, the report may be submitted through ANAC’s external channel pursuant to Article 6 of Legislative Decree 24/23.

4.2.2 Absence of the Whistleblowing Channel Manager

In the event of a prolonged absence—that is, for a period exceeding 7 days—of the Whistleblowing Channel Manager, reports will be handled by a staff member of the Channel Manager who has been specifically appointed as a substitute and who meets the requirements of autonomy, independence, and impartiality required by law for the Channel Manager, as well as having received specific whistleblowing training to ensure effective, independent, and autonomous handling of the report in compliance with the confidentiality obligation set forth in Legislative Decree 24/23.

5. Subject Matter and Content of Reports

5.1. Subject Matter of Reports

This Policy applies to reports concerning violations that may have an impact on the Company and its business operations.

In particular, through the Whistleblowing System, it is possible to report acts or facts involving **Fonderie Cortiana** entities and/or, in any case, anyone acting in the name, on behalf of, or in the interest of the Company.

The acts or facts that are the subject of the report may concern:

- unlawful conduct as defined under Legislative Decree 231/2001;
- violations of the organizational, management, and control models as defined under Legislative Decree 231/2001;
- violations of European Union restrictive measures.

Only reports concerning facts learned by the Reporter within the context of their work will be considered; they must not constitute personal claims or requests relating exclusively to the Reporter's individual employment relationship or to their working relationship with superiors.

Also excluded are reports that are clearly unfounded, information already in the public domain, and information obtained on the basis of unreliable rumors (e.g., office gossip). The aforementioned violations must not be reported through the System if they came to light during an audit or any other investigative activity.

5.2. Content and Requirements of Reports

Reports must:

- concern situations of which the Reporter has become directly aware by virtue of their employment relationship with **Fonderie Cortiana**. Therefore, they include all unlawful conduct or omissions of which the Reporter has become aware by virtue of their role and in the course of performing their work duties, even if discovered incidentally;
- be truthful, detailed, and based on precise and consistent evidence, concerning verifiable facts known directly to the Whistleblower;
- contain information, including reasonable suspicions, regarding actual or potential violations that have occurred or are highly likely to occur within the organization where the Whistleblower works or has worked, or in another organization with which the Whistleblower is or has been in contact in the course of their professional activities, as well as attempts to conceal such violations.

To ensure that reports meet the above requirements, it is helpful for them to contain sufficient information to provide a complete and comprehensive account of the unlawful event; specifically, it is helpful to include:

- except in the case of an anonymous report, the Reporter's identifying information (e.g., personal details, contact information, professional title or position, and the address where the acknowledgment of receipt of the report should be sent);
 - a description of the facts that are the subject of the report, including the known circumstances (manner, time, and place) relating to the reported facts, the individuals involved, and how the information came to light;
- identifying information regarding the person reported, if known, and any other individuals who may be able to provide information regarding the facts that are the subject of the report;
- any other information that may provide useful support for ascertaining and verifying the existence of the facts subject to the Report;
- any documentation supporting the reported fact, using the designated document upload function.

Please note that the absence of one or more of the above items of information does not invalidate the receipt of the Report.

6. Reporting Methods and Channels

In order to enable the Policy's recipients to fulfill their reporting obligations, **Fonderie Cortiana** has established various channels through which recipients can submit reports and has set forth the process for managing reports as described below in § 7. To facilitate the submission and receipt of reports and ensure confidentiality in the handling of reports, the Company has established an **internal reporting channel** that allows reports to be submitted:

- in writing, via regular mail;
- orally, via a dedicated telephone line;
- through a face-to-face meeting between the Whistleblowing Manager and the Whistleblower, at the latter's request.

Whistleblowers may also submit their reports through the **external reporting channel** as well as via public disclosure. As will be explained in the following paragraphs, these options may be used when the conditions provided for by law are met, and in particular under Articles 6 and 15 of Legislative Decree 24/23.

Furthermore, in accordance with applicable regulations, **Fonderie Cortiana** guarantees the possibility of **making reports anonymously**. These may be accepted and processed provided they are adequately substantiated and contain sufficient detail to make them verifiable.

Therefore, given the extensive legal protections afforded to whistleblowers, **Fonderie Cortiana** encourages and promotes reports that identify the individual involved, as these are more effective; in any case, the company recommends that any anonymous whistleblower, where possible, submit a report supported by evidence or, at the very least, provide as much detail as possible.

6.1. Internal Reporting Channel:

The Company, after consulting with the most representative local labor unions, has established the following reporting channels:

- for **written reports**: by mail to the following address: Via Cengio No. 15, 36100 Vicenza, attention: Casa & Associati Law Firm.

The Reporter must place the report in a double sealed envelope: the first containing the Reporter's identifying information; the second envelope containing the report. Both must be placed in a third sealed envelope bearing the words "Confidential addressed to the Reporting Channel Manager" on the outside. The report will be recorded confidentially by the Channel Manager through a logbook maintained by the same;

- for **oral reports**: the dedicated telephone line 3316554508, active Monday through Friday during the following hours: 9:00 AM–1:00 PM and 2:00 PM–7:00 PM. If a telephone line or voicemail system with a recording feature is used, the Channel Manager, with the reporter's prior consent, may document the report by recording it on a device suitable for storage and playback.

If an unrecorded telephone line or voicemail system is used, the Channel Manager documents the report by preparing a detailed account of the conversation.

The Whistleblower may also request a **face-to-face meeting** with the Channel Manager, which must take place within a reasonable timeframe either on or off the organization's premises, ensuring the confidentiality of the whistleblower and the content of the report.

In the event of a face-to-face meeting, the Channel Manager, with the whistleblower's prior consent, may document the report by recording the meeting using devices suitable for storage and playback; or, if recording is not possible, the Manager shall prepare a written record, which must also be signed by the whistleblower, who may verify its content and correct it as necessary at the time of signing.

Whistleblowers are required to use only the channels specifically established for submitting reports, as these channels offer greater guarantees in terms of security. In the event that a report is sent, by mistake, through other means, the Company undertakes to guarantee and ensure the confidentiality of the whistleblower's identity and the protection of the data of all parties involved.

6.2. External Reporting Channels

As provided for in Legislative Decree 24/2023, ANAC has established an "external" reporting channel (see below) that guarantees the confidentiality of the whistleblower, the person involved, and the person mentioned in the report, as well as the content of the report and the related communication.

Private-sector individuals may file a report using the aforementioned external channel if one of the following mandatory conditions set forth in Article 6 of Legislative Decree 24/23 applies:

- the mandatory activation of the internal reporting channel is not provided for within the Whistleblower's work context; or, even if mandatory, it is not active; or, even if active, it does not comply with the provisions of Article 4;

- the Whistleblower has already filed an internal report using the tools referred to in the preceding paragraphs, but no action was taken on it;
- the Whistleblower has reasonable grounds to believe that, if an internal report were made, it would not be effectively followed up or that it could entail a risk of retaliation;
- the Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

With regard to the external report received, ANAC:

- issues the Whistleblower an acknowledgment of receipt within 7 days of receiving the external report, unless the Whistleblower explicitly requests otherwise unless ANAC determines that such notification would compromise the confidentiality of the Whistleblower's identity;
- provides the Whistleblower with a response regarding the Report received within 3 months of the date of the acknowledgment of receipt or, in the absence of such acknowledgment, within three months of the expiration of the 7-day period following receipt of the Report; if there are justified and substantiated reasons, the aforementioned response shall be provided within 6 months from the date of the acknowledgment of receipt or, in the absence of such acknowledgment, within 6 months from the expiration of the 7-day period following receipt of the Report;
- notifies the Whistleblower of the final outcome of the Report.

6.3. Public Disclosure

The Whistleblower may make a public disclosure through the press or electronic media, or through any other means of dissemination capable of reaching a large number of people, under the conditions and in the manner provided for in Article 15 of Legislative Decree 24/2023.

In particular, a Whistleblower who makes a public disclosure is entitled to the protection provided by Legislative Decree 24/23 if, at the time of the public disclosure, one of the following conditions applies:

- the Whistleblower has previously filed an internal and external report or has directly filed an external report, and no response has been received within the prescribed time limits;
- the Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- the Whistleblower has reasonable grounds to believe that the external report may entail a risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those in which evidence may be concealed or destroyed, or in which there is a well-founded fear that the recipient of the report may be colluding with the perpetrator of the violation or involved in the violation itself.

7. Internal Reporting Management Process

The Channel Manager's activities can be summarized as follows:

7.1. Acknowledgment of Receipt of the Report

Upon receiving a report through the internal channels established by the Company, the Channel Manager shall, within 7 days of the report's submission, issue an acknowledgment of receipt to the reporting individual.

7.2. Preliminary Review of the Report Received

The Channel Manager conducts a preliminary review to determine whether the report qualifies as a whistleblowing report by verifying the subjective and objective criteria—namely, that the reported matter falls within the scope of the regulation and that the report is submitted by an authorized individual. The Channel Manager must also verify that the report:

- is based on specific facts;
- contains a clear description of the facts that are the subject of the report and how the whistleblower became aware of them;
- includes the identifying information of the person involved or other details that allow for the identification of the person involved in the report.

The Channel Manager is the only authorized party to communicate with the reporting individual and may request additional information or clarifications.

If, following verification, the conditions are not met, the report will be closed with an indication of the reasons.

7.3. Investigation and Verification of the Report

If, following the preliminary investigation, the report is deemed relevant, the Channel Manager will initiate an investigation to verify the validity of the reported facts. Specifically, the Channel Manager:

- may obtain the necessary information directly from the reporting individual;
- may involve other company departments or external experts with specialized technical and professional expertise.

Once the investigation phase is complete, the Channel Manager may:

- dismiss the report as unfounded, communicating the reasons to the reporter;
- determine that the report is well-founded and refer it to the relevant internal bodies or departments for appropriate action.

7.4. Response to the Reporting Person

Upon completion of the investigation into the report, the Channel Manager must notify the reporting person of the outcome—whether the report has been dismissed, an internal investigation has been initiated, or the case files have been forwarded to the relevant internal bodies and/or external entities/institutions. This response must be provided within three months of the date of the acknowledgment of receipt or, in the absence of such acknowledgment, within three months of the expiration of the seven-day period following the submission of the report.

7.5. Retention of Documentation Related to Reports and Deletion

The Channel Manager, as well as any company departments involved, ensure the traceability of data, information, and controls, and are responsible for retaining and archiving the documentation produced—whether in paper and/or electronic form—in a manner that allows for the reconstruction of the various stages of the process.

Once the reporting process has been completed, the Channel Manager will delete the report and related documentation no later than five years after notifying the reporter of the final outcome of the reporting procedure.

8. Reports Sent to Multiple Recipients

If a report is sent simultaneously to multiple recipients, all of whom are employees of the same organization, the report shall be treated as if it had been sent to a non-authorized recipient. Where the Whistleblower expressly states that they wish to benefit from whistleblowing protections, or where such intent can be inferred from the report or from conclusive facts or conduct, the report is considered a “whistleblowing” report, and those not authorized to receive it must forward it, within 7 days of receipt, to the competent internal party, simultaneously notifying the reporting person. Conversely, if the Whistleblower does not expressly state that they wish to benefit from the protections or if such intent cannot be inferred from the report, the report is considered an ordinary report.

If the report is sent not only to the internal party responsible for handling it but also to multiple parties outside the organization, it will be necessary to assess whether a public disclosure has occurred and whether any of the conditions set forth in Article 15 of Legislative Decree 24/23 apply. The Channel Manager shall be required to seek clarification from the reporting person regarding the circumstances that led to the disclosure of the information in order to ascertain whether the conditions set forth in the aforementioned Article 15 are met. In any case, if a public disclosure is submitted through an internal channel, the Channel Manager is required to follow up on it. If none of the conditions set forth in Article 15 of Legislative Decree 24/23 apply, the public disclosure will be treated as an ordinary report, and the whistleblowing regulations will not apply.

9. Protections

The protective measures provided for in Legislative Decree 24/23 apply to the whistleblower when the following conditions are met: namely, at the time of the report, the whistleblower had reasonable grounds to believe that the information regarding the reported violations was true and fell within the scope of Article 1 of the same decree.

For the purposes of their protection, the reasons that led the person to make the report are irrelevant.

Protective measures are not guaranteed if the whistleblower's criminal liability for the offenses of defamation or slander has been established, even by a first-instance judgment, or if their civil liability for the same offenses has been established in cases of willful misconduct or gross negligence.

The same protections also apply in the case of anonymous reports if the whistleblower has subsequently been identified and has suffered retaliation.

9.1. Confidentiality Obligation

Fonderie Cortiana guarantees the confidentiality of the Whistleblower's identity (where disclosed) and the confidentiality of the information contained in reports at every stage of the report handling process, to the extent that anonymity and confidentiality are enforceable under applicable law.

In particular, it is the responsibility of the Whistleblowing Manager to ensure the confidentiality of the Whistleblower's identity (if disclosed) from the moment the report is received until the conclusion of the investigation into its validity, even in cases where the report proves to be incorrect or unfounded. Reports may not be used beyond what is necessary to adequately address them.

The identity of the Whistleblower (if disclosed)—and any other information from which that identity may be directly or indirectly inferred—may not be disclosed, without the Whistleblower's express consent, to anyone other than those authorized to receive or follow up on reports, who are expressly authorized to process such data.

In the event that a report is forwarded to other departments, bodies, or third parties for the purpose of conducting an investigation, the Whistleblowing Manager is required to separate the Reporter's identifying information (if known) from the content of the report, so that the facts reported can be processed anonymously and that the link between the report and the identity of the Reporter (if known) is established only in cases where it is strictly necessary.

With regard to reports submitted via paper mail, the confidentiality of the Reporter, the content of the report, and any persons involved in the report is guaranteed by the double-envelope system described in section 6.1.1.

With regard to reports submitted via telephone, the confidentiality of the reporting person, the content of the report, and any persons involved is guaranteed by the direct forwarding of the call to the Channel Manager.

In the case of a face-to-face meeting, the confidentiality of the reporting person, the content of the report, and any persons involved is guaranteed by the fact that only the Channel Manager participates in the meeting. Disclosure of the Whistleblower's identity (where known) and of any other information from which the Whistleblower's identity may be directly or indirectly inferred is permitted only if this constitutes a necessary and proportionate obligation imposed by European Union or national law in the context of investigations by national authorities or judicial proceedings, including for the purpose of safeguarding the rights of defense of the person involved.

The Reported Party, in fact, may not request to know the name of the Whistleblower, except in cases expressly provided for by law.

In the context of disciplinary proceedings initiated by Fonderie Cortiana, the identity of the Whistleblower (if known) may not be disclosed if the disciplinary charge is based on findings that are distinct from and additional to the report, even if they result from it.

If, however, the allegation is based, in whole or in part, on the report and knowledge of the Whistleblower's identity is essential for the accused's defense, the report may be used for the purposes of the disciplinary proceeding only with the Whistleblower's consent to the disclosure of their identity. In such cases, the Whistleblower is notified in writing of the reasons for the disclosure of the confidential information.

The same notice is provided to the Whistleblower as part of the reporting procedures when the disclosure of the Whistleblower's identity is also essential for the defense of the person involved.

The Company guarantees confidentiality and protects the identity of the persons involved and those mentioned in the report until the conclusion of the proceedings initiated as a result of the report, in accordance with the same safeguards provided for the Whistleblower.

A breach of the confidentiality obligation constitutes grounds for disciplinary liability, without prejudice to any additional forms of liability provided for; pursuant to Article 21, paragraph 1, letter a) of Legislative Decree 24/23, in the event that a violation is found to have occurred, ANAC will impose an administrative fine of between €10,000.00 and €50,000.00 on the responsible party.

9.2. Prohibition of Retaliatory Actions

No form of retaliation, harassment, or discriminatory action—whether direct or indirect—against the Whistleblower is permitted or tolerated for reasons directly or indirectly related to the report. This protection is guaranteed even when the report, although unfounded, was made in good faith and with reasonable grounds.

By way of example and without limitation, pursuant to Legislative Decree 24/2023, the following constitute retaliation:

- dismissal, suspension, or equivalent measures;
- demotion or denial of promotion;
- change of duties, change of workplace, reduction in salary, or change in work schedule;
- suspension of training or any restriction on access to training;
- negative performance evaluations or negative references;
- the imposition of disciplinary measures or other sanctions, including financial penalties;
- coercion, intimidation, harassment, or ostracism;
- discrimination or otherwise unfavorable treatment;
- failure to convert a fixed-term employment contract into a permanent employment contract, where the employee had a legitimate expectation of such conversion;
- failure to renew or early termination of a fixed-term employment contract;
- damages, including damage to a person's reputation—particularly on social media—or economic or financial harm, including the loss of economic and loss of income;

inclusion on blacklists based on a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in that sector or industry in the future;

- early termination or cancellation of a contract for the supply of goods or services;
- the revocation of a license or permit;
- a request to undergo psychiatric or medical evaluations.

Retaliatory actions taken as a result of a report are null and void.

The burden of proving that the conduct or actions described above are motivated by reasons unrelated to the report rests with the person who carried them out.

Anyone who engages in retaliatory acts against the whistleblower will be subject to the disciplinary sanctions provided for in the Company's Model 231/Disciplinary System and applicable regulations, as well as to the financial penalties imposed by ANAC pursuant to Article 21, paragraph 1, letter a) of Legislative Decree 24/23.

Pursuant to Article 19 of Legislative Decree 24/23, the entities and persons referred to in Article 3 of the same decree may report to ANAC, via an online platform, any retaliation they believe they have suffered.

If, following the conclusion of the sanctioning proceedings, the retaliatory nature of the measure taken is established, ANAC will notify the ITL so that it may take the appropriate measures within its jurisdiction.

9.3. Private Interest and Joint Liability of the Whistleblower

The Whistleblower is required to disclose any private interest they may have in connection with the report.

If the Whistleblower is jointly liable for the violations reported, the disciplinary measures imposed on them may be mitigated in proportion to the contribution the report made to the discovery and/or prevention of such violations.

The Whistleblowing System is therefore designed to allow the Whistleblower to disclose (i) the existence of a private interest in relation to the report, as well as (ii) any shared responsibility the Whistleblower may have in relation to the acts or facts that are the subject of the report.

10. Disciplinary System

Failure to comply with this Policy may result in the application of the Company's Disciplinary System to Company employees, in accordance with applicable laws and relevant collective bargaining agreements.

Without prejudice to the sanctions that may be imposed by ANAC pursuant to Legislative Decree 24/2023, **Fonderie Cortiana** will also take appropriate disciplinary or contractual measures against:

- anyone found responsible for any act of retaliation, discrimination, or otherwise unlawful prejudice, whether direct or indirect, against the Whistleblower (and/or anyone who has assisted in the investigation of the facts subject to a report and/or individuals connected to the Whistleblower) for reasons directly or indirectly related to the report;
- the Reported Party, for established liabilities;
- anyone who violates the confidentiality obligations set forth in the Policy;
- employees, as provided by law, who have made a groundless report with intent or gross negligence;
- anyone who abuses the reporting mechanism, such as by making reports for opportunistic purposes and/or with the intent to harm the accused;
- the Whistleblowing Manager if he or she violates the duty of independence and professionalism in handling reports or otherwise engages in conduct that is unjustified and deviates from the provisions of the Policy.

11. Annual Reporting

The Whistleblowing Manager shall prepare, at least once a year, a report on the reports that have been closed and on the results of the activities carried out in connection with the reports under investigation. The report shall be submitted to the Administrative Body.

12. Dissemination of the Policy and Training

The Company provides clear information on the channels, procedures, and requirements for making **internal** reports, as well as on the channels, procedures, and requirements for making **external** reports.

The aforementioned information is published in a dedicated section of the Company's website, as well as displayed and made easily visible in the workplace, and accessible to individuals who, although not present in the workplace, have a legal relationship with the Company (e.g., company bulletin board).

In addition to the information made available to everyone pursuant to Article 5, paragraph 1, letter e) of Legislative Decree 24/23, the Company is committed to ensuring the widest possible understanding of the Whistleblowing System through training programs for all employees. These training programs are periodically updated as appropriate.

13. Responsibility for Updates

The departments involved, each within their respective areas of responsibility, are responsible for identifying operational events within the company that require an update to the Policy and are required to submit a request for such an update to the Board of Directors, which shall assess any risks of non-compliance and implement the changes and/or additions deemed appropriate.

14. Data Processing

The processing of personal data is carried out in compliance with Regulation (EU) 2016/679 (GDPR), as well as any other applicable and compatible laws and/or regulations, and the privacy policy published on the Company's website.

The handling of reports involves the processing of personal data pertaining to the Reporter (if the report identifies the reporter by name), the Subject of the Report (e.g., first name, last name, position held, etc.), any third parties, as well as any additional information collected during the investigation necessary to verify the validity of the report.

The data collected is used exclusively for the processing of the report, and any data not necessary for this purpose is immediately deleted.

The processing of personal data carried out by the competent departments and supervisory bodies as part of the report management process falls under the responsibility of the "Data Processors pursuant to Article 28 of the GDPR" and the

“persons authorized to process personal data pursuant to Article 29 of the GDPR,” who are specifically appointed for their respective areas of responsibility, in accordance with legal provisions and in compliance with the Policy.

The process for managing reports is based on compliance with the principles of lawfulness and fairness; data minimization; purpose limitation; storage limitation; identification of appropriate technical and organizational measures through the preparation of a DPIA prior to processing; providing a privacy notice regarding the processing of personal data to data subjects by publishing it on the Company’s website; and ensuring that the processing register is kept up to date.

Data subjects may exercise the rights recognized by Articles 15–22 of the GDPR within the limits set forth in Article 2-undecies of Legislative Decree 196/2003. In such cases, the Company undertakes to guarantee the confidentiality of the whistleblower and to take all necessary precautions to that end.

Where the conditions set forth in Article 2-undecies(f) of Legislative Decree 196/2003 apply—namely, that the exercise of rights cannot be exercised with the Data Controller or the Authority because it could compromise the confidentiality of the person who made the report—the Company may limit, delay, or exclude the exercise of such rights for the time and to the extent that this is a necessary and proportionate measure, taking into account the legitimate interests and fundamental rights of the data subject, and shall notify the data subject thereof unless such notification would compromise the purpose of the limitation. In such cases, the rights may also be exercised through the Data Protection Authority in accordance with the procedures set forth in Article 160.

For details regarding the processing of personal data in the report management process, please refer to the privacy notice pursuant to Articles 14 and 14 of the GDPR, published in a dedicated section of the Company’s website.

15. Approval and Update of the Policy

The Policy is approved and adopted by resolution of the Administrative Body. The Human Resources Office and the Administrative Department are responsible for updating the Policy:

- if the relevant legislation has changed;
- if changes in operations and/or critical issues arise;
- if new, recognized, and widely adopted methodologies (best practices) become available.

The update is approved by resolution of the Administrative Body.

The Policy and its updates are published through the channels and in the manner described in paragraph 11.