

PRIMA INDUSTRIE

Group Whistleblowing Policy

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Glossary

Italian Legislative Decree no. 231/2001 or Decree – Italian Legislative Decree 8 June 2001, n. 231, containing the discipline of the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to art. 11 of the Law of 29 September 2000, n. 300 and subsequent amendments and additions.

Recipient of the report of wrongdoing – Internal Audit Risk & Compliance Department.

EU Directive 2019/1937 - Directive of the European Parliament and the Council of the European Union concerning the protection of people who report violations of EU law.

Feedback on report of wrongdoing undertaking – Feedback that Prima Industrie provides to notify the whistleblower of the undertaking of the report of wrongdoing.

Feedback on the outcome of the investigation Feedback that Prima Industrie provides to notify the whistleblower of the conclusion of the investigations and, where deemed appropriate, the outcome of such investigation.

Functions – Every function part of the Prima Industrie Group.

231 Model – Organization, Management and Control Model provided for by art. 6 of Legislative Decree 231/2001 of each Italian company of the Group.

Supervisory Body or “Organismo di Vigilanza” – Body in compliance with art. 6 of Legislative Decree 231/2001, responsible for supervising the functioning and observance of the Model and its update for each Italian company of the Group.

Whistleblower – The person who reports a wrongdoing.

Subjects of the report – The person, internal or external to the Group, subject of the report of wrongdoing.

Report of wrongdoing (hereinafter also “report”) – Any communication received by the company, concerning behavior (of any nature, even purely omissive) referable to company staff or to third parties that may represent irregularities or violations of laws, regulations and/or internal procedures.

Anonymous report of wrongdoing – A report of wrongdoing for which the whistleblower’s identity is not known.

Company – Every company part of the Prima Industrie Group.

Whistleblowing Preliminary Analysis Report – The report prepared by Corporate Internal Audit at the conclusion of the preliminary analysis activities.

Final Whistleblowing Investigation Report – The report prepared by Corporate Internal Audit at the conclusion of the whistleblowing management process.

Whistleblowing Register – Register in which all the reports received are registered, managed in a manner suitable to guaranteeing the privacy of the whistleblower and the confidentiality of the content of the reports of wrongdoing. The register also details the results of the preliminary analysis (as per the “Whistleblowing Preliminary Analysis Report”) and of the possible investigation (“Final Whistleblowing Investigation Report”).

1. PURPOSE

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This Policy regulates the entire process of managing reports of wrongdoing, including the methods of forwarding, receiving, analyzing, investigating, reporting and filing of the reports, in accordance with best practices, reference standards (e.g. ISO 37002) and the principles introduced at European level by **EU Directive 2019/1937** - concerning the protection of persons who report violations of EU law.

With regards to Italian legislation, this Policy incorporates the provisions contained in Law no. 179 of 2017, containing "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship". In this regard, the Policy implements the principles contained within the Organizational Model with regards to the management of reports of wrongdoing relevant for the purposes of Legislative Decree 231/2001.

2. SCOPE

The Policy applies to all the companies of the Prima Industrie Group and to all types of reports of wrongdoing. Reports of wrongdoing can be sent by anyone, employees or third parties, even anonymously.

3. GENERAL PRINCIPLES

Prima Industrie is inspired and follows the following general principles in its Whistleblowing Management process:

- **Confidentiality:** Prima Industrie is committed to guaranteeing maximum confidentiality on the individuals and facts reported, as well as on the identity of the whistleblower. Anyone who receives, analyzes or processes a report of wrongdoing is required to ensure the confidentiality of the information processed and of the identity of the whistleblower, within reasonable limits and with the exception of cases in which the involvement of additional company functions is needed.
- **Limited sharing:** Prima Industrie is committed to ensuring that access to reports of wrongdoing and/or information contained therein is strictly regulated by the "need-to-know principle" and that such reports and/or information can only be shared with those for which it is deemed necessary.
- **Objectivity and impartiality:** Prima Industrie is committed to ensuring that reports of wrongdoing are handled in full compliance with the principles of objectivity and impartiality. No action will be taken against the reported person solely on the basis of what is stated by the whistleblower, without the collection of objective evidence and without fact checking the information contained in the report of wrongdoing.
- **Possibility of anonymity:** Prima Industrie guarantees full management of all reports of wrongdoing, therefore not only of the reports in which the whistleblower is known, but also of the anonymous reports, as long as they are clear, detailed and related to the work/professional scope. The anonymous reports of wrongdoing will be examined and analyzed in the same manner as those made in a non-anonymous form, with the exception of cases where it is difficult or not possible to contact the whistleblower to request collaboration and obtain further useful information, if necessary.
- **Protection from retaliation:** Prima Industrie does not tolerate threats, retaliation and/or discrimination against anyone who makes reports of wrongdoing in good faith. The whistleblower acting in good faith or whoever participates in the investigation will be protected from any form of retaliation and may not be fired, undergo changes in duties, be suspended, transferred or subjected

to other organizational measures that have negative effects on working conditions, or be threatened, harassed or discriminated against in any way, for reporting a wrongdoing in good faith.

- **Treatment of personal information:** Any information and personal data acquired will be processed in compliance with the privacy regulations and, if not clearly relevant or of interest for the purpose of the report of wrongdoing, it will not be taken into consideration, processed or filed. As part of the Whistleblowing Management process, the Group may have access and be required to process personal data of employees for the purpose of carrying out internal analyses and investigations aimed at verifying the reports relating to the possible commission of unlawful acts/fraud and/or alleged violations of obligations related to the employment relationship, without the need for further consent.
- **Punishment of conduct not in line with the principles of the Whistleblowing Policy:** In accordance with the applicable labor regulations, the Group reserves itself the right to take appropriate action against: (i) anyone who violates the protection measures of the whistleblower; (ii) anyone who makes false and/or unfounded reports of wrongdoing in bad faith or with gross negligence for the sole purpose of defaming, slandering or otherwise damaging the person subject of the report; (iii) whoever, in his capacity as reported, is deemed to be effectively responsible for the reported facts.

4. WHISTLEBLOWING MANAGEMENT

4.1. Who can report

Anyone, internal or external to the Group, operating in the name and on behalf of Prima Industrie or who in any case have an interest in company activities (so-called “whistleblowers”) can report wrongdoings. These include:

- The directors and members of the Corporate Bodies (Shareholders, Board of Directors, Board of Statutory Auditors, etc.).
- Employees and collaborators/partners of the Group in various capacities.
- Third Parties (for example collaborators, consultants with any type of contract or assignment, individuals acting on behalf of the organization such as intermediaries and agents, suppliers of products or services, distributors, business partners, stakeholders).

4.2. What to report and characteristics of a report of wrongdoing

The individuals identified in the previous paragraph can report the following types of overt or suspicious situations and conduct (so-called **reports of wrongdoing**):

- Criminally relevant conduct, which can include crimes, offenses or irregularities or in any case in violation of laws, regulations or provisions of the Authorities.
- Violation of the principles contained in the Code of Ethics or of the other Group Compliance Programs (eg Anticorruption Program, Export Controls Manual, etc).
- Violations of the principles contained in the Organizational Models compliant to Legislative Decree 231/2001 of the Italian Companies, or of the related implementation tools (e.g. procedures).
- Conduct capable of causing financial damage (fraud, embezzlement, conflicts of interest) or image damage to the Prima Industrie Group.
- Conduct likely to cause damage to the health or safety of employees, users and citizens or to cause damage to the environment.

- Offers, receipt or requests for money, goods or other benefits from and to third parties or employees of the Company.
- Conduct capable of causing damage to the public interest.

In order to facilitate any subsequent investigations, **the Group promotes the use of reports of wrongdoings with the following characteristics and minimum contents:**

- Reports must be substantiated and based on precise and consistent factual elements.
- Reports must provide useful elements to allow the persons in charge to proceed with the necessary and appropriate checks and investigations.
- Although the Company encourages reporting parties to disclose their identity to facilitate validity checks, it is also possible to report anonymously, as long as such reports are sufficiently detailed and able of bringing out facts and situations by relating them to specific contexts. Anonymous reports of wrongdoing might not ensure same level of compliance with specific regards to applicable regulations on the safeguard of the whistleblower.

The content of the reports **must never concern** the following circumstances, which will not be treated as "reports of wrongdoing" if reported:

- Complaints of a personal nature by the whistleblower.
- Claims/requests that fall within the normal discipline of the employment relationship.

4.3. Competent Body for managing the Whistleblowing process and the reporting channels

Prima Industrie has identified the Internal Audit, Risk & Compliance Department as the **recipient of the reports of wrongdoing**. Reports can be sent through the following channels:

- Email address: compliancehelpline@primaindustrie.com
- Phone number: + 39 011 4103623
- Postal address: Prima Industrie S.p.A., Internal Audit, Risk & Compliance, Via Pianezza, 36, 10093 Collegno TO

The Internal Audit Risk & Compliance Department is responsible for ensuring the maintenance of the reporting channels listed above, ensuring adequate publicity, including through the Group's Internet and Intranet sites.

In compliance with the provisions included in the European Directive 2019/1937 and the Italian legislation (Law No. 179 of 2017 and Law 53/2021), the reporting channels listed above protect the confidentiality of the whistleblower and of the data and information shared, guaranteeing to those who intend to reveal their identity to receive adequate protection and to be exempt from retaliation and/or discriminatory acts.

All employees, including function managers, Senior Managers and Vice Presidents, who receive reports directly must promptly communicate them to the Internal Audit Risk & Compliance Department for their involvement, guaranteeing the confidentiality of the content and of any person identified in the report. Failure to comply with this obligation could lead to disciplinary sanctions (based on the indications and evaluations by the governance bodies and the HR function).

4.4. Whistleblowing Management Process

The operational steps to be followed for the management of reports are summarized below.

4.4.1. Phase 1: Preliminary Analysis

The Internal Audit Risk & Compliance Department ensures the necessary and appropriate assessments aimed at directing the subsequent phases of the process, ensuring maximum speed and compliance with the principles of objectivity, competence and professional diligence.

Upon receipt, each report of wrongdoing is promptly registered in the [Whistleblowing Register](#) (see *Annex 1*), regardless of the contents and characteristics of the report itself. In the case that the references of the whistleblower are available, the Internal Audit Risk & Compliance function also provides feedback to the whistleblower on the undertaking of the report ([Feedback on report of wrongdoing undertaking](#), see *Annex 2*).

After the registration of the report, the Internal Audit Risk & Compliance Department initiates the preliminary analysis of the report. During this phase, in compliance with the principles of confidentiality and “need-to-know” basis and if deemed necessary, the Internal Audit Risk & Compliance Department can evaluate the involvement of other competent corporate functions/bodies in consideration of the nature of the report, such as:

- **Group HR Department or HR Department of the Company concerned**, if the report of wrongdoing is potentially significant in terms of violation of the applicable labor regulations or relating to aspects of personnel and/or organizational management.
- **Group Legal Department**, if the report of wrongdoing contains elements that require specific legal skills to ensure an adequate assessment of the reported fact.
- **HSE and/or Employer for the purposes of Health and Safety of the Workers of the Company concerned**, if the report concerns situations that could cause damage to the health or safety of employees, users and citizens or to the environment.
- **Group Data Protection Officer (DPO) or DPO of the Company concerned**, if the report is potentially relevant in terms of violation of the privacy legislation.
- **Other Group functions** in case of specific needs.
- **Supervisory Body of any Italian company concerned** (also known as “Organismo di Vigilanza”), as its involvement is mandatory if the report is potentially relevant for the purposes of Legislative Decree 231/2001 and concerns behaviors that could constitute the commission of one of the crimes provided for in the Decree or suspected or overt violations of the principles of the Model or of the instruments for its implementation (e.g. procedures).

At the end of the phase, the Internal Audit Risk & Compliance Department prepares a specific [Whistleblowing Preliminary Analysis Report](#), describing the contents of the received wrongdoing reporting and the outcome of the preliminary analysis and classifying the report of wrongdoing as:

- **“Clearly unfounded”**, for which it is not necessary to proceed with an investigation.
- **“Not verifiable”**, for which it is not possible to proceed with an investigation, as the report itself is lacking elements deemed sufficient.
- **“Verifiable and to be investigated”**, for which it is necessary to proceed with an investigation, as the report is sufficiently detailed.

The Whistleblowing Preliminary Analysis Report is then sent to the Control and Risks Committee, the Statutory Auditors and the Executive Chairman of Prima Industrie S.p.A. and potentially to the functions and bodies involved in the “Preliminary Analysis” phase, in compliance with the principles of confidentiality and “need-to-know” basis. The content of the document is also transcribed within the Register, in order to ensure full traceability of the process and information managed.

4.4.2. Phase 2: Investigation

For reports registered as "Verifiable and to be investigated", the Internal Audit Risk & Compliance Department defines a work plan in order to verify whether the contents of the report of wrongdoing are confirmed (fully or partially).

In case the report of wrongdoing is relevant with regards to Legislative Decree 231/2001, the Supervisory Body of the Italian company concerned must be constantly involved and informed on the progress of the investigation.

In order to confirm the validity of the report, the Internal Audit Risk & Compliance Department can:

- Contact the whistleblower (if not anonymous) for an individual and confidential interview, in order to receive clarifications and/or additions to the information and documents provided.
- Carry out meetings with any other individuals who may account on the facts reported.
- Carry out any other activity deemed appropriate for the purpose of confirming the report.

The Internal Audit Risk & Compliance Department can appoint external consultants or experts to support the investigation, if deemed necessary and subject to the definition of adequate confidentiality and non disclosure agreements.

In the case of a relevant report of wrongdoing with regards to Legislative Decree 231/2001, the involvement of external consultants and/or experts in support of the investigation is communicated to the Supervisory Body of the company concerned.

Anyone involved in the investigation phase is subject to the same confidentiality constraints and responsibilities as the Internal Audit Risk & Compliance Department, and is obliged to refrain from managing the report in case of possible conflicts of interest.

4.4.3. Phase 3: Definition of actions to be taken following the investigations

Upon completion of the investigation, the Internal Audit Risk & Compliance Department assesses the actions to be taken, based on the outcome of the investigations:

- **"Unfounded reports of wrongdoing"**: In the event of reports of wrongdoing that, once investigated, are determined to be unfounded, the Internal Audit Risk & Compliance Department proceeds to file the report. No action or sanction is considered against those who report facts in good faith that, following subsequent verifications, prove to be unfounded.
- **"Unfounded and bad faith reports of wrongdoing"**: In the event of reports that, once investigated, are determined to be unfounded and in bad faith and made for the sole purpose of discrediting one or more people or company functions or the Group and/or in any case considered as harassing to others employees, the Internal Audit Risk & Compliance Department informs the competent corporate functions, in order for them to assess the possibility of sanctioning against the person reporting in bad faith, and/or other measures deemed appropriate, including - if the conditions are met - reporting to the Competent judicial authority.
- **"Well-founded reports of wrongdoing"**: In the event of well-founded reports (or which appear to be such), the Internal Audit Risk & Compliance Department promptly informs the competent corporate functions, in order to allow for the preparation of a detailed action plan. Depending on the situation, the action plan may also include the possibility of reporting to the Judicial Authority of criminal, civil and/or administrative offenses, as well as the adoption of sanctions against the

reported person and/or in any case the individuals found authors of the unlawful conduct and/or violations reported.

In case of events of 231 relevance, the Internal Audit Risk & Compliance Department assesses the need for any adaptation of the Organizational Model, in agreement with the Supervisory Body of the company concerned.

4.4.4. Phase 4: Reporting

Upon conclusion of the whistleblowing management process, the Internal Audit Risk & Compliance Department formalizes a **Final Whistleblowing Investigation Report** containing the following information:

- A summary of the activities performed.
- The main results.
- Any reasons that led to the dismissal of the report, if deemed unfounded.
- Any potential gaps identified.
- Any action plans defined.
- Any imposition of sanctions against the subject of the report or the whistleblower in bad faith.
- The possible opening of judicial proceedings against the subject of the report or against the whistleblower who acted in bad faith.

The Final Whistleblowing Investigation Report is always sent to the Control and Risks Committee, to the Statutory Auditors and to the Executive Chairman of Prima Industrie SpA, as well as to the management of the Function/Company concerned and, depending on the specific nature of the report, to the Supervisory Board (“Organismo di Vigilanza”) of the Companies involved.

The contents of the Final Whistleblowing Investigation Report are transcribed within the Whistleblowing Register, in order to ensure full traceability of the process followed and the information managed.

At the end of the reporting phase and in the event of a non-anonymous report, the Internal Audit Risk & Compliance Department provides the whistleblower with feedback on the outcome of the investigations and, where deemed appropriate, on the outcome of the same (**feedback on the outcome of the investigation** - see Annex 3).

4.5. Filing

The Internal Audit Risk & Compliance function is required to guarantee the registration of all reports of wrongdoing and the traceability and adequate filing of the reports and all related documentation produced during the investigations, ensuring the highest standards of data security and confidentiality.

4.6. Treatment of any retaliatory and/or discriminatory acts

Any whistleblower who believes to have suffered a retaliatory and/or discriminatory act as a consequence of the report made can notify his/her superior, the Head of the competent HR Function or the Internal Audit Risk & Compliance Department, in order for them to evaluate:

- The need/opportunity to restore the situation and/or to remedy the negative effects of the discrimination.
- The existence of the necessary conditions to initiate disciplinary proceedings against the perpetrator of retaliation and/or discrimination.

The whistleblower can also notify the trade union organization to which he/she adheres or the representative organization present in the company.

4.7. Application of Disciplinary Actions

In compliance with the principles defined in this Policy and in compliance with the provisions of the applicable labor legislation, Prima Industrie reserves the right to apply adequate disciplinary measures aimed at:

- **Subjects of reports of wrongdoing responsible for the facts reported:** employees who, based on the investigations carried out, are responsible for serious irregularities and violations of internal regulations or procedures. In the event that the person reported is a third party, the Group reserves the right to apply penalties or the immediate termination of the contract, in accordance with the provisions of the contractual clauses defined.
- **Personnel who violates the measures of protection of the whistleblower:** employees who threaten, intimidate or in any way demonstrate retaliatory behavior or in any case violate the protection measures of the whistleblower in good faith.
- **Whistleblower in bad faith:** anyone who knowingly and in bad faith makes false and/or unfounded reports for the sole purpose of defamation, slander or damage to the reported person or to the other individuals mentioned in the report (unfounded reports made with willful misconduct or gross negligence).

Furthermore, any disciplinary measures could be applied to individuals who have violated the principles of this Policy.

5. ROLES AND RESPONSIBILITIES

5.1. Employees

All employees who become aware of true or presumed facts deemed potentially illegal or not in line with the ethical principles that inspire Prima Industrie operations or otherwise fall within the scope of this policy are required to promptly report them in accordance with this policy.

Employees who, for whatever reason, receive a report of wrongdoing must:

- Promptly send it to the Internal Audit Risk & Compliance function.
- Ensure the confidentiality of the content and of the identity of the whistleblower.

5.2. Internal Audit Risk & Compliance Department

- Manages and ensures the maintenance of the reporting channels.
- Promptly analyzes the report of wrongdoing and shares it with the competent functions/bodies in consideration of the nature of the report (e.g. Supervisory Board of the company involved in the case of reports relevant for the purposes of Legislative Decree 231/2001, the Data Protection Officer of the company involved in case of reports relevant for privacy purposes, etc.), in compliance with the principle of confidentiality.
- Promptly informs and periodically updates the other competent corporate functions/bodies involved of the progress of the investigations, depending on the nature of the report.
- Plans audit activities to be performed and takes care of their execution, directly or through the appointment of third party professionals.

- Informs the Control and Risks Committee, the Statutory Auditors and the Executive Chairman of Prima Industrie S.p.A. of the receipt of the report and the results of the preliminary analysis, through the preparation of a Whistleblowing Preliminary Analysis Report, and of the results of the investigation and the improvement actions undertaken, through the preparation of the Final Whistleblowing Investigation Report.
- Informs, depending on the specificity of the case, the Supervisory Body and the Board of Statutory Auditors of the company involved of the management of the reports of wrongdoing received.
- It takes care of the maintenance of the Whistleblowing Register, ensuring the registration of the reports of wrongdoing and the archiving of all related documentation.

5.3. Company Supervisory Board involved in the report of wrongdoing

- Communicates the possible involvement of external consultants in investigations relating to reports relevant for the purposes of Legislative Decree 231/2001.
- May request further investigations from Internal Audit Risk & Compliance.
- Provides information on any need to update the 231 Model.

6. OTHER RELEVANT DOCUMENTS

- Code of Ethics of the Prima Industrie Group.
- Organizational, Management and Control Model in accordance to D.Lgs. 231/2001 of the Italian Companies.
- Anti-Corruption Program (for the Group companies for which the program is available).
- Export controls manual (for the Group companies for which the manual is available).

ANNEX 1 – Whistleblowing Register Template

1. Data Identifying the Report of Wrongdoing		
N. of Wrongdoing Report Protocol:		
Date of Report Receival:		
Means by which the report was received:		
Type of Report: Anonymous/Not Anonymous		
Company Concerned by the Report:		
Whistleblower:		
Report of wrongdoing (detail the full text of the report):		
Documentation attached to the report:		
Feedback on report of wrongdoing undertaking: sent/not sent		
Report potentially relevant for the purposes of Legislative Decree 231/01 (only for Italian companies): YES/NO		
2. Preliminary Analysis		
Other competent corporate functions/bodies involved in the preliminary analyses in consideration of the nature of the report:		
<ul style="list-style-type: none"> • Function Name (specify) • Function Name (specify) • ... 		
Results of the preliminary analyses:		
<ul style="list-style-type: none"> • "Clearly unfounded", for which it is not necessary to proceed with an investigation. • "Not verifiable", for which it is not possible to proceed with an investigation, as the report itself is lacks elements deemed sufficient. • "Verifiable and to be investigated". 		
Whistleblowing Preliminary Analysis Report sent on DD-MM-YYYY to:		
<ul style="list-style-type: none"> • Control and Risks Committee • Statutory Auditors • Executive Chairman of Prima Industrie S.p.A • Others (specify) • Others (specify) • ... 		
3. Investigation carried out and any actions to be taken (only for "verifiable/to be investigated" reports)		
Third parties involved in the investigation (if applicabile):		
Summary of procedures carried out:		
Results of investigation:		
<ul style="list-style-type: none"> • "Unfounded reports". • "Unfounded and bad faith reports". 		
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<ul style="list-style-type: none"> • "Well-founded reports".
Any reasons that led to the filing of the report, if deemed unfounded:
Areas for improvement identified in the Internal Control and Risk Management System:
Action plans and improvements identified:
Any sanctioning measures against the subject(s) of the report or the party who reported in bad faith:
Final Whistleblowing Investigation Report sent on DD-MM-YYYY to: <ul style="list-style-type: none"> • Control and Risks Committee • Statutory Auditors • Executive Chairman of Prima Industrie S.p.A • Others (specify) • Others (specify) • ...
Feedback of investigation outcome: sent/not sent

ANNEX 2 – Feedback on report of wrongdoing undertaking

Dear “whistleblower”,

we inform you that your report was received and registered with the number n. YYYY-NNN.

We will investigate the nature of the report, to assess its validity and verifiability, guaranteeing:

- confidentiality and restricted sharing of the information received;
- objectivity and impartiality in the analyses that will be carried out;
- protection from any retaliation and/or discrimination of any form against you;
- punishment of conduct not in line with the principles of the Whistleblowing Policy.

Should further information emerge that you deem appropriate to share on the reported matter, we invite you to communicate it without hesitation and in absolute safety to the e-mail address:

compliancehelpline@primaindustrie.com.

In the event that, following the preliminary analysis of the report, the need to launch an in-depth investigation emerges, we will inform you about the completion of the investigation.

Thank you for your help,

The Head of Internal Audit, Risk & Compliance

ANNEX 3 – Feedback on the outcome of the investigation

Dear “whistleblower”,

we inform you that, following your report registered with the number n. YYYY-NNN, such report was assessed as eligible for further study and an investigation was subsequently launched, which ended on DD-MM-YYYY.

Following the investigation carried out, the report was classified as:

- *“Unfounded report of wrongdoing”.*
- *“Unfounded and bad faith report of wrongdoing”.*
- *“Well-founded report of wrongdoing”.*

[PARTE IN ROSSO DA VALUTARE – NON OBBLIGATORIA]

The results of the investigation were reported to the Company's Governance and Control Bodies, in order to follow up on the appropriate actions to be taken.

We confirm that the investigations, as well as all subsequent activities that will derive from them, have been carried out ensuring:

- *confidentiality and restricted sharing of the information received;*
- *objectivity and impartiality in the analyses that will be carried out;*
- *protection from any retaliation and/or discrimination of any form against you;*
- *punishment of conduct not in line with the principles of the Whistleblowing Policy.*

Thank you for your help,

The Head of Internal Audit, Risk & Compliance