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WHISTLEBLOWING PROCEDURE

Novellini Group

Novellini S.p.a.

novALmec S.r.l.

Novellini Industries S.r.l.

Rev. no.	Purpose	Date	Approved by
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1. Adoption and revisions

This document has been fully read, shared, approved and signed by the Board of Directors of the Novellini Group and in particular by the companies Novellini S.p.a., novALmec S.r.l, and Novellini Industries S.r.l. for the first time on 28 March 2024. Each of the companies that adopts this procedure reserves the right to carry out any revision also in the light of the provisions of Italian Legislative Decree 24 of 10 March 2023 and any subsequent regulatory changes that may occur. This document is made available and published on the website www.novellini.it and made available on the bulletin board and on the company intranet, in particular on the employee portal.

2. Definitions

C.d.A. [*Board of Directors*]: Board of Directors

Code of Ethics: adopted pursuant to Italian Legislative Decree no. 231/01, it is a document with which the Company sets out all the rights, duties and responsibilities of the Company with respect to all the subjects with whom it enters into relationship for the achievement of its corporate purpose. The Code of Ethics aims at setting ethical “standards” of reference and behavioural rules that the Recipients of the Code must comply with in their relations with the Company for the purposes of preventing and repressing illegal conduct.

Collaborators: those who act in the name and/or on behalf of the Company on the basis of a mandate or other collaborative relationship (by way of example and not limited to: financial promoters, interns, contract and project staff, workers in outsourcing, agents and brokers, etc.).

Consultants: Persons who carry out their activity in favour of the company by virtue of a contractual relationship.

G.D.P.R.: European Regulation 2016/679 on the protection of personal data.

Italian Legislative Decree 231/01 or Decree: Italian Legislative Decree no. 231 of 8 June 2001, relating to “Rules on the administrative liability of legal persons, companies and associations, including those without legal personality” as amended and supplemented.

Recipients of the Code of Ethics: shareholders, members, corporate bodies, employees, as well as all those who, although external to the Company, operate, directly or indirectly, for the same (without limitation collaborators in any capacity, consultants, suppliers, customers, financial promoters, interns, contract and project staff, workers in outsourcing, agents and brokers, etc.).

Recipients of the Model: members of the corporate bodies, the auditing company, employees, as well as those who, although not falling into the category of employees, operate for the company and are under the control and direction of the Company (without limitation: financial promoters, interns, contract and project staff, workers in outsourcing, agents and brokers, etc.).

Manager of the Report: the person who receives and deals with the management of investigation relating to the report.

Employees: all employees of the Company (first, second and third professional area staff; managers; executives).

Italian Law 146/2006: Law No. 146 of 16 March 2006 (Ratification and implementation of the United Nations Convention and Protocols against Transnational Organised Crime, adopted by the General Assembly on 15 November 2000 and 31 May 2001).

Model/MOGC: Organisation, management and control model pursuant to Arts. 6 and 7 of the Decree.

Supervisory Body (for the sake of brevity “SB”): Supervisory Body provided for in Articles 6, paragraph 1, letter b) and 7 of Italian Legislative Decree 231/2001; it is entrusted with the task of supervising the operation, ensuring compliance with the Model, and updating it.

Related persons: Individuals who have a personal or work relationship with the whistleblower.

Platform: IT tool for the management of reports.

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Reporting: any information concerning alleged findings, irregularities, breaches, reprehensible behaviour and facts or in any event any practice that does not comply with the provisions of the Code of Ethics and/or the Organisation, Management and Control Model.

Anonymous reporting: if the whistleblower's details are not explicit or otherwise identifiable.

Open report: if the whistleblower openly raises an issue without limits related to his/her confidentiality.

Confidential reporting: if the identity of the reporting party is not disclosed, but it is nevertheless possible to trace it in specific and certain circumstances referred to below.

Reporting in bad faith: the report made for the sole purpose of damaging or, in any event, cause prejudice to a Recipient of the Code of Ethics and/or the Model. Reports made with wilful misconduct or gross negligence that prove to be unfounded.

Company: the legal entity that holds and issues the procedure;

Reporting Persons/Whistleblowers: the Recipients of the Code of Ethics and/or the Model, as well as any other person who relates to the Company in order to make the report.

Subjects of reporting: the Recipients of the Code of Ethics and/or the Model who are the authors of alleged findings, irregularities, breaches, reprehensible conduct and facts or in any event any practice that does not comply with the provisions of the Code of Ethics and/or the Organisation, Management and Control Model.

Third Parties: contractual counterparties of the Company, both natural and legal persons (such as suppliers, consultants, etc.) with whom the company enters into any form of contractually regulated collaboration, and who are going to cooperate with the Company within the scope of the activities subject to risk.

Subordinates: persons subject to the direction or supervision of a person at a top level pursuant to art. 5 paragraph 1 letter b) of the Decree.

Breaches: actions or omissions committed during or related to work activities, by any person within the Company, on its behalf or within relations with the Company or the Company's stakeholders, that:

- a) have occurred;
- b) can reasonably be assumed to have occurred
- c) are very likely to occur.

Attempts to conceal such actions or omissions are also considered "violations", and that:

- a) constitute or may constitute a breach, or an inducement to a breach or frustrate the object or purpose:
 - of laws and other applicable regulations, at all levels (international, national, regional, local), without prejudice to any specific limitations defined by locally applicable legislation (see Italian Legislative Decree 24/2023, art. 1 "Objective scope");
 - of the values and principles set out in the Company's Code of Ethics, the Company's Principles of Conduct and the Company's other anti-corruption procedures;
 - of the Organizational, Management and Control Model, the Code of Ethics and the Disciplinary Code adopted by the Company pursuant to Italian Legislative Decree 231/01, of the Company's Policies and Procedures and the internal control principles; and/or
- b) constitute or may constitute administrative, accounting, civil or criminal offences;
- c) cause or may cause any type of damage (for example economic, environmental, safety or reputational damage) to the Company, its employees and third parties, such as, for example, suppliers, customers, business partners or the external community; and/or
- d) are identified as relevant by the applicable regulations governing the reporting of breaches of regulatory provisions

Whistleblowing: the action of reporting breaches by the Whistleblower.

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3. Regulatory reference

- Italian Legislative Decree 231/2001 - Regulations governing the administrative liability of legal persons, companies and associations, including those without legal personality;
- Italian Legislative Decree 24/23 - Implementation of European Directive 1937/19 of the European Parliament and of the Council, concerning the protection of persons who report breaches of Union law and containing provisions concerning the protection of persons who report breaches of national regulatory provisions;
- EU Regulation 2016/679 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);
- Italian Legislative Decree 196/2013 as amended and supplemented - Personal Data Protection Code, as supplemented with the amendments introduced by Italian Legislative Decree no. 101 of 10 August 2018, "Provisions for the adaptation of national law to the provisions of (EU) Regulation 2016/679 of the European Parliament and Council of 27 April 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)";

4. Purpose

This Whistleblowing Policy (hereinafter the "Policy"), adopted by the Novellini Group and in particular by the companies Novellini S.p.a., Novellini Industries S.r.l. and Novalmec S.r.l. subject to the application of the regulations on the protection of whistleblowers referred to in Italian Legislative Decree 24/2023 (hereinafter referred to as the "Company"), establishes the procedure for reporting breaches, the guidelines for managing Reports and the protection standards for Whistleblowers, Facilitators (where existing) and Related Persons (for all definitions of the terms used, see the "Definitions" section). The Policy also guarantees the principles of confidentiality, protection of anonymity and prohibition of retaliation, in accordance with applicable regulations. The provisions of this Policy do not affect or limit in any way the right or obligation, as may be defined by applicable law, to report to the competent regulatory, supervisory or judicial authorities in the countries where the Company operates and/or to any supervisory body established at the Company. This Policy is addressed to all Recipients defined in the "Definitions" section and applies to the Company, without prejudice to any specific local laws governing the issue that are in conflict with it. The Policy is drawn up in accordance with the regulations referred to in art 3.

5. Scope of application

This regulation applies to the Recipients of the Model and/or the Code of Ethics, namely:

- Shareholders;
- Members of the board of directors;
- Members of the Board of Statutory Auditors;
- Supervisory board pursuant to Italian Legislative Decree 231/01;
- Employees, including former employees and candidates at recruitment stage;
- Collaborators (freelancers, consultants, volunteers, interns, etc.);
- Those who, although not falling into the category of employees, work for the Company and are under the control or in any event act in accordance with the indications or are submitted to the direction of the same (by way of example and not limited to: interns, contract and project staff, workers in outsourcing);
- Those who, although external to the company organization, operate, directly or indirectly, in a stable manner, for or with the Company (e.g. collaborators on a continuous basis; strategic suppliers, representatives, agents and brokers, etc.);
- Local communities and members of civil society organisations (e.g. NGOs);
- Any third party affiliated or related or in any way connected to the aforementioned subjects;
- More generally, any stakeholder of the Company.

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6. Adoption and dissemination

This procedure is an integral and substantial part of Model 231 and, therefore, is approved by the Company's Management which, upon any proposal by the Supervisory Body, is also responsible for updating and supplementing it.

It is accessible in an electronic format

- in the company intranet in folder "MOGC 231", if active;
- in the company website www.novellini.it;
- in the employee portal at <http://dipendenti.novellini.it/portale>
- in the company bulletin board.

The same dissemination methods set out above are adopted for subsequent revisions and additions to the procedure.

7. Principles of reference

The persons involved in this procedure act in compliance with the regulatory and organisation system and internal powers and proxies, and are required to operate in accordance with the laws and regulations in force and in compliance with the principles set out below.

KNOWLEDGE AND AWARENESS

This reporting procedure is a fundamental element in order to ensure full awareness for effective monitoring of risks and their interrelationships, and to guide changes in strategy and organisation context.

GUARANTEE OF THE CONFIDENTIALITY OF PERSONAL DATA AND PROTECTION OF THE WHISTLEBLOWER AND THE PERSON SUBJECT TO REPORTING

All persons who receive, consider and evaluate reports, as well as any other person involved in the reporting process, are required to guarantee the utmost confidentiality on the reported facts, the identity of the person subject to reporting and the whistleblower who is appropriately protected from retaliatory, discriminatory or otherwise unfair conduct.

PROTECTION OF THE PERSON SUBJECT TO REPORTING IN "BAD FAITH"

All subjects are bound to respect each other's dignity, honour and reputation. To this end, the whistleblower is obliged to declare whether he/she has a private interest relating to the report. More generally, the Company guarantees adequate protection from "bad faith" reports, sanctioning similar conduct and informing that reports sent for the purpose of damaging or otherwise harming as well as any other form of abuse of this document are a source of liability, both from a disciplinary perspective and in other competent instances.

IMPARTIALITY, AUTONOMY AND INDEPENDENCE OF JUDGMENT

All the subjects who receive, examine and evaluate the reports meet moral and professional standards and ensure the maintenance of the necessary conditions of independence and due objectivity, competence and diligence in the performance of their activities.

8. Parties Involved

The reporting system can be activated by the following subjects:

- Members of the corporate bodies

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- employees (whatever type of contract) who in any event operate on the basis of relationships that determine their inclusion in the company organisation, even in a form other than an employment relationship;
- third parties having relations and business relationships with the company, in a stable manner (e.g. collaborators on a continuous basis; strategic suppliers);
- all subjects falling within the scope of this procedure, as defined in article 5.

9. Responsibilities and roles

The responsibilities of the process are entrusted to the Management, which provides the necessary resources to:

- guarantee the preservation and confidentiality of the original documentation relating to reports in appropriate paper/computer archives, with the highest standards of security/confidentiality,
- monitor the communication channels.
- evaluate approval of requests for the adoption of organisation measures and/or the imposition of sanctions or disciplinary measures and/or the initiation of legal proceedings,
- update and make available the reporting forms.

Within the management system of the administrative responsibility of the company, the responsibilities relating to the process of management of reports lie with the SB or its specific members designated for this purpose, who

- are the recipient of the reports,
- are responsible for evaluating its content,
- keep the register of reports up to date,
- take action for any investigations and further enquiries that may be necessary to ascertain the content of the reports,
- report directly to the Management on the outcome of the assessment and investigation process regarding the unlawful acts and/or violations of the Model found, so that the latter adopt the disciplinary sanctions deemed applicable as well as the improvement actions necessary to implement the effectiveness of the Model.

The determination regarding the disciplinary actions to be undertaken, the application of the corresponding sanctions and the initiation of any legal proceedings in relation to the facts outlined in the report are exclusively the responsibility of the employer and/or in any event the Management Body, which is in charge of the effective implementation of the Organizational, Management and Control Model.

In the context of the above, the SB is not entitled to report the identity of the whistleblower in any form, nor communicate information or clues that enable the tracing back to the same: the violation of this rule constitutes a violation of the Model by the same SB. Subject to the exceptions set out in this procedure and the case where it is the whistleblower himself/herself who decides to disclose his/her identity and authorises disclosure. Without prejudice to the communications required by law in the event of reports with slanderous or defamatory content, as well as those deriving from any criminal proceedings that may arise from the report itself.

In particular, it should be noted that, taking into account the Collegiate composition of the Supervisory Body, the whistleblowing electronic channel accessible through the link on the company website www.novellini.it or directly at the address <https://novellinispa.signalact-inaz.it/whistleblowing/> is exclusively managed by the external member of the Board, identified in the person of Ms. Valeria Bortolotti. This Manager is the recipient of the reports that come from the aforementioned electronic channel and is responsible for carrying out the first evaluation of the existence of the conditions for assessing the suitability and relevance of the report. In the event that the report passes the judgment of suitability and relevance, it is shared with the Supervisory Board. If the reporting party has decided not to remain anonymous, the Manager will not disclose the identity of the same to the Board, unless the Board makes a reasoned request to this effect to the Manager and the latter considers the reasons well-founded for such sharing. In the event of manifestly unfounded or irrelevant reports, the Manager shall periodically inform the Supervisory Body on the actions taken and their management, also with a view to assessing any proposals for raising awareness on the reporting process. In the event of irrelevant reports, the Manager must nevertheless inform the whistleblower regarding the dismissal of the report and, as far as possible and compatible with her role, indicate the

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person that can be contacted in order that the requests unrelated to the reporting process but potentially of interest in relation to the business or in any event to the company business are addressed.

The dialogue through the electronic platform will always and only take place with the Manager of the Report. The other communication channels with the Supervisory and Reporting Body already made available by the company on due time for the purpose of the adoption of the Organisation, Management and Control Model remain unaffected. They are identified below:

- by post, in a closed envelope bearing the words "RESERVED" addressed to the attention of the Supervisory Body of the Company concerned by the report and sent by post to the address Via Mantova no. 1023, (46030) Borgo Virgilio – Fraz. Romanore (MN) or inserted personally in the relevant box located at the same premises. If the whistleblower intends to ensure a reinforced level of protection regarding his/her identity, he/she is invited to insert the report in two closed envelopes, including, in the first, the identification data of the whistleblower and, in the second, the text of the report or any other means for its transmission (e.g. CD or other support in the event of voice recording); both envelopes must then be inserted in a third envelope addressed to the address referred to above;
- requesting a direct interview with the manager of Whistleblowing or with the Supervisory Body, by making the request by means of a message to be transmitted through the <https://novellinisp.signalact-inaz.it/whistleblowing/> portal;
- by contacting directly the Chairman of the Supervisory Board, external to the organization of the Company Mr. Salvatore Vittorio Castelli, Via Perosi no. 54, 20862 Arcore (MB).

For communications regarding which there are no particular needs for protection or confidentiality of one's identity, it is also possible to write to the entire Board of Supervisory Body at adv231@novellini.it

10. The subject of the report

The subject of the report is the commission or attempted commission of one of the offences provided for by Italian Legislative Decree 231/2001, Italian Law 146/06, as well as violations as defined by Italian Legislative Decree 24/2023 or the violation or fraudulent circumvention of the principles and provisions of the Organisation, Management and Control Model and/or the ethical values and rules of conduct of the Company's Code of Ethics, of which one becomes aware due to the functions performed.

Please note that all actions or omissions, including the corresponding attempts, even if unsuccessful, are subject to reporting if

- a) constitute or may constitute a breach, or an inducement to a breach or frustrate the object or purpose:
 - of laws and other applicable regulations, at all levels (international, national, regional, local), without prejudice to any specific limitations defined by locally applicable legislation (see Italian Legislative Decree 24/2023, art. 1 "Objective scope");
 - of the values and principles set out in the Company's Code of Ethics, the Company's Principles of Conduct and the Company's other anti-corruption procedures;
 - of the Organizational, Management and Control Model, the Code of Ethics and the Disciplinary Code adopted by the Company pursuant to Italian Legislative Decree 231/01, of the Company's Policies and Procedures and the internal control principles; and/or
- b) constitute or may constitute administrative, accounting, civil or criminal offences;
- c) cause or may cause any type of damage (for example economic, environmental, safety or reputational damage) to the Company, its employees and third parties, such as, for example, suppliers, customers, business partners or the external community; and/or
- d) are identified as relevant by the applicable regulations governing the reporting of breaches of regulatory provisions

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Reports may concern, without limitation:

- breaches relating to the protection of workers, including accident prevention regulations;
- alleged unlawful acts, among those provided for by Model 231 of the Company, by corporate representatives in the interest or for the benefit of the company;
- violations of the Code of Ethics, Model 231, company procedures;
- unlawful conducts in the context of relations with representatives of public administrations.

Reports taken into consideration are only those concerning facts that are directly found by the whistleblower, not based on rumours; furthermore, the report must not concern complaints of a personal nature.

The reports must be substantiated and based on precise and concordant elements, must relate to facts that are verifiable and known directly to the person making the report, and must contain all the information necessary to identify the authors of the unlawful conduct.

The reporting party is therefore required to clearly and completely report all the elements useful for carrying out the checks and assessments necessary to consider their validity and objectivity, indicating, without limitation:

- references as to the course of events (e.g. date, place), any information and/or evidence that may provide valid proof of the facts reported;
- general information or other elements that make it possible to identify who has committed what has been declared;
- general information of other subjects that may report on the facts subject to reporting;
- any private interests connected to the Report.

Although the Company considers reports transmitted in non-anonymous form to be preferable, anonymous reporting is, however, also permitted.

Anonymous reports are accepted only if they are adequately substantiated and enabling to bring to light specific facts and situations.

They will be taken into consideration only if they do not appear *prima facie* irrelevant, unfounded or unsubstantiated, even following any additions subsequently provided either spontaneously and/or at the request of the Manager of the Report.

In any event, the requirements of good faith and the veracity of the facts or situations reported remain unaffected, for the protection of the defendant.

The Whistleblower must not use the tool for purely personal purposes, claims or retaliations, which, rather, fall within the more general discipline of the employment/collaboration relationship or relations with their hierarchical superior or colleagues for which reference should be made to the procedures falling within the competence of the corporate structures.

Recipients who become aware of breaches are encouraged to report the relevant facts, events and circumstances promptly, in good faith and provided they have reasonable grounds to believe that such information is true. The Reports must be as detailed as possible, to provide useful and adequate information that allows the effective verification of the validity of the reported events. If possible and when known to the Whistleblower, the Report shall include:

- the name of the Whistleblower and relevant contact details for further communication; however, Reports may also be submitted anonymously, and the Company guarantees to Whistleblowers who decide not to disclose their identity adequate means to monitor their Reports in respect of their anonymity, in particular through the portal <https://novellinispasignalact-inaz.it/whistleblowing/>.
- a detailed description of the events occurred (including date and place) and how the Whistleblower became aware of them;
- which law, internal regulation, etc. is alleged to have been violated;

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- the name and role of the Person(s) subject to reporting or the information that allows them to be identified;
- the name and role of any other persons who may report on the reported events;
- any documents or other elements that can substantiate the reported events.

The documentation will be kept and processed according to the applicable laws, as also specified in the section "Processing of personal data".

Disputes, claims or requests relating to a personal interest of the whistleblower or the person who has filed a complaint with the judicial or accounting authority that relates exclusively to their individual employment or public employment relationships, or inherent to their employment or public employment relationships with hierarchically superior figures (therefore and without limitation, reports concerning employment disputes, discrimination between colleagues, interpersonal conflicts between the whistleblower and another worker are excluded).

In order to allow the completeness of the reports, facilitating the reporting party in the drafting of the relevant communication, the organization makes available a special form for reports, if one does not intend to use the electronic portal: The use of the form is just optional, the whistleblower being free to report in the form he or she deems most appropriate to the case.

11. Procedure for the management of reporting

11.1. Reporting channels

In order to ensure that the flow of reports cannot in any way be subject to interference or unauthorized access by the company, the latter appoints the Supervisory Body as the investigator of the reports, entrusting the management of the <https://novellinisp.signalact-inaz.it/whistleblowing/> electronic channel to the relevant member external to the company identified in the person of Ms. Valeria Bortolotti. The company reserves the right to identify additional Manager of the Reports or qualified subjects with different profiles in relation to the aforementioned reporting channel (for example, with the role of author, editor, contributor, signatory or in charge of receiving exclusively reports attributable to certain categories): these subjects must receive adequate instructions, be independent, and have the necessary skills to carry out their task and manage the Reports with due diligence; these subjects, if identified, may perform other tasks and duties in addition to the Management of reports, provided that this does not result in a conflict of interest.

Anyone who receives a Report that falls within the scope of this Policy outside the dedicated channels, for any reason and by any means, must:

1. guarantee the confidentiality of the information received, having the obligation not to disclose the identity of the Whistleblower or the Person subject to reporting or any other person mentioned in the Report, nor any information that would allow them to be directly or indirectly identified; any breach of confidentiality will be subject to civil, disciplinary or criminal liability, if applicable;
2. direct the Whistleblower to comply with the procedure for submitting Reports established by this Policy and/or forward the Report using the dedicated channels established by this Policy to the competent Manager of the Report (on the date of this procedure, identified in the person of Ms. Valeria Bortolotti, member of the Supervisory Body appointed pursuant to Italian Legislative Decree 231/01).

The violation may be reported through the external channel activated by the ANAC, or disclosed publicly (by putting information on the breach in the public domain through the press or electronic media or in any event through means of dissemination capable of reaching a large number of people), only when even one of the following circumstances occurs:

- the internal and/or external report, already made, has not been followed up;
- the Whistleblower has reasonable grounds to believe that, using the internal and/or external channel, no effective follow-up would be given to the report;
- the Whistleblower has a well-founded concern about retaliation;
- the Breach may constitute an imminent or obvious danger to the public interest.

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The reporting channel made available by ANAC can be reached at: <https://whistleblowing.anticorruzione.it>.

If a whistleblower has a reasonable suspicion that one of the violations referred to in this procedure has occurred or may occur, he/she has the possibility of making a report in the following ways:

- by post, in a closed envelope bearing the words "RESERVED" addressed to the attention of the Supervisory Body of the Company concerned by the report and sent by post to the address Via Mantova no. 1023, (46030) Borgo Virgilio – Fraz. Romanore (MN) or inserted personally in the relevant box located at the same premises. If the whistleblower intends to ensure a reinforced level of protection regarding his/her identity, he/she is invited to insert the report in two closed envelopes, including, in the first, the identification data of the whistleblower and, in the second, the text of the report or any other means for its transmission (e.g. CD or other support in the event of voice recording); both envelopes must then be inserted in a third envelope addressed to the address referred to above;
- requesting a direct interview with the manager of Whistleblowing or with the Supervisory Body, by making the request by means of a message to be transmitted through the <https://novellinisp.signalact-inaz.it/whistleblowing/> portal;
- by contacting directly the Chairman of the Supervisory Board, external to the organization of the Company Mr. Salvatore Vittorio Castelli, Via Perosi no. 54, 20862 Arcore (MB).

For communications regarding which there are no particular needs for protection or confidentiality of one's identity, it is also possible to write to the entire Board of Supervisory Body at odv231@novellini.it

All listed reporting channels are designed and operated in a secure manner, in order to prevent access to information by unauthorized personnel and to ensure that the identity of the Whistleblower and other persons involved in the investigation remains confidential.

11.2. Review and evaluation of reports

The person in charge of receiving and analysing the reports as the Manager of the same is the Supervisory Body. The same provides for the examination in compliance with the principles of impartiality and confidentiality, carrying out any activity deemed appropriate.

In particular, it should be noted that, taking into account the Collegiate composition of the Supervisory Body, the *whistleblowing* electronic channel accessible through the link on the company website www.novellini.it or directly at <https://novellinisp.signalact-inaz.it/whistleblowing/> is exclusively managed by the external member of the Board, identified in the person of Ms. Valeria Bortolotti. This Manager is the sole recipient of the reports that come from the aforementioned electronic channel.

The dialogue through the electronic platform will always and only take place with the Manager of the Report. The other communication channels with the Supervisory and Reporting Body to which reference is made in this procedure and already made available by the company on due time for the purpose of the adoption of the Organisation, Management and Control Model remain unaffected.

The Supervisory Body directly carries out all activities aimed at ascertaining the facts reported. It can also make use of support and collaboration from corporate structures and departments when, due to the nature and complexity of the verifications, their involvement, as well as external consultants involvement is necessary.

In any event, throughout the management of the report, the right to confidentiality of the whistleblower is preserved.

The Whistleblower, having received the report, issues to the Whistleblower a notice of receipt within 7 (seven) days of the date of receipt.

The Whistleblower reviews the Report to determine if it is substantiated.

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Initially, it conducts a preliminary analysis to determine if there are sufficient elements for a potential or actual violation and therefore undertakes the first assessment of the existence of the conditions for the verification of suitability and relevance of the report (the so-called “plausibility verification”).

In the event of a positive outcome, i.e., in the event that the report passes the judgment of suitability and relevance, the Report is shared with the Supervisory Body and further investigated. In the event that the whistleblower has decided not to remain anonymous, the Manager shall not disclose the identity of the whistleblower to the Board, unless the Board makes a reasoned request to that effect to the Manager and the latter considers the reasons for the sharing to be well-founded.

In the event of failure to pass the plausibility verification, that is, in the event of clearly unfounded or otherwise irrelevant reports, the Manager periodically informs the SB of the actions undertaken and their management, also in order to evaluate any proposals for raising awareness regarding the reporting process. In the event of irrelevant reports, the Manager must in any case inform the whistleblower regarding the filing of the report and, as far as possible and compatible with her role, in the event that the Report does not fall within the scope of this Policy, refer the same to other channels or other company procedures to which it is possible to refer or in any case address to follow up on communications unrelated to the reporting process but potentially of interest in relation to the business or in any event to the company business.

If it is possible to consider that the facts contained in the Report constitute a crime, the SB will inform the Company's Management by providing its opinion and the latter will evaluate, also in agreement with the other competent company functions, as the case may be, whether and when the information contained in the Report must be submitted to the competent judicial authorities, also according to the applicable legislation. The Manager and the SB are therefore responsible for verifying the Report and conducting a timely and accurate investigation, in compliance with the principles of impartiality, fairness, proportionality and confidentiality vis-à-vis the Whistleblower, the person subject to reporting and all parties involved in the Report.

During these checks, the SB may be assisted from time to time by the competent corporate functions and/or specialised external consultants, guaranteeing the confidentiality of the information and making as much personal data as possible anonymous, also in compliance with the principle of minimising data processing. The SB may also entrust other corporate functions with the responsibility of conducting some or all of the verification activities of the Report, always in compliance with this Policy.

The SB remains in any event responsible for monitoring compliance with the principles set out in this Policy, the formal correctness of the process and the adequacy of subsequent actions. It is understood that any disciplinary measures will be defined as specified in the “Results of the checks” section.

During the investigation, the SB through the Manager of the Reports, as well as the Manager herself, may ask the Whistleblower to provide additional necessary and proportionate supporting information; the Whistleblower has the right to complete or correct the information provided, in compliance with the principle of good faith. The Company reserves the right to take measures to protect itself against Whistleblowers who knowingly submit false reports. The Manager of the Reports or the SB may also conduct interviews or request information from other persons who may be aware of the reported events.

Persons subject to reporting are guaranteed the right to defence and/or to be informed of the outcome of the investigation, within the limits provided for by applicable law.

In the event that the Manager of the Report or the SB or one of its members are in a position of conflict of interest in the evaluation of the report and/or in the execution of the investigation, each of these subjects must declare it to the other members of the SB or, if the conflict concerns the entire Board, to the Governing Body and must refrain from participating in the activities relating to the specific file. This exception shall be documented.

In the event of a conflict of interest in relation to the Manager of the Report, the plausibility verification shall also be managed by the other members of the SB, who shall have the obligation to manage it as defined in this Policy, guaranteeing its confidentiality and traceability. In the event that the Report concerns a situation that places the entire SB in situations of conflict of interest, and a different Third Party Manager has not been appointed, it will be assigned to the Board of Statutory Auditors. This circumstance must also be adequately documented.

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In summary, the activities in which the process of management of reports is divided are: reception, investigation and assessment.

- Receipt: the Manager receives the reports;
- Investigation and assessment: the Manager carries out a first plausibility assessment.
 - a) If this examination is passed, the investigation of the report is entrusted to the SB in a collegial composition, which evaluates the reports received using, depending on their nature, the internal structures of the Company to carry out in-depth investigations on the facts subject to reporting. It can directly listen to the author of the report - if known - or the subjects mentioned in it; as a result of the investigative activity, it takes the consequent decisions, justifying them, dismissing, where appropriate, the report or submitting its opinion to the Company regarding the possibility and/or opportunity to proceed with the evaluation for disciplinary and sanctioning purposes of what has been ascertained and/or the appropriate interventions on the MOGC.
 - b) If the first assessment is not passed, the whistleblower is informed and information is provided regarding the channels or procedures to refer to for his/her communications.

If the investigations carried out show situations of violations of the MOGC and/or the Code of Ethics, or the SB has acquired the well-founded suspicion of the commission of a crime, the SB promptly notifies without delay the report and its assessments to the President of the Board of Directors, remaining available to report directly, where requested, to the Board of Directors and the Board of Statutory Auditors.

The Manager informs the non-anonymous whistleblower about the progress of the procedure through the electronic platform or, in the event of other channels, the SB provides the same information with the same means through which the report was received, taking into account the obligation of confidentiality in relation to the information received, also for compliance with legal obligations, which prevent the disclosure of the outcome in external environments.

Reports sent for the purpose of damaging or otherwise harming as well as any other form of abuse of this document are a source of liability for the whistleblower, both from a disciplinary perspective and in other competent instances, especially if the groundlessness of the content of the report is ascertained as well as the instrumental and voluntary falsehood of accusations, findings, censures, etc.

To this end, if, during the assessment, the report received proves intentionally defamatory, and/or unfounded and carried out with wilful misconduct or gross negligence, in accordance with the above, the Company may apply appropriate disciplinary measures.

In order to guarantee the reconstruction of the different phases of the process and the complete traceability of the interventions undertaken for the fulfilment of its institutional functions, the Manager of the Report and the SB are required to document the reports received, also through the electronic tools made available by the Company, as the case may be.

The documents in electronic format are kept by the Manager of the Report and the SB in a protected mode and accessible only to the components of the SB or the Manager, as well as to the subjects expressly authorized by the SB taking into account the limits relating to the sharing of data and information imposed by this policy. The documentation relating to the investigation of reports should preferably be archived, where possible, directly on the report management channel, in order to ensure the formation of a single file of the same. To this end, any paper documents can be scanned and uploaded to the platform. Reports received through channels other than the platform, where the telematic tool adopted allows it, will be entered on the portal by the Manager, in order to create the corresponding electronic file.

In the event of reports produced in obvious bad faith, the SB or, if detected in the context of the plausibility verification, the Manager, reserves the right to dismiss them by deleting the names and elements that may allow the identification of the persons subject to reporting.

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Paper documents are stored in an identified place whose access is allowed to the members of the SB, or to persons expressly authorised by the SB. The above is without prejudice to the management of the electronic archive.

The electronic archive and the electronic channel for the management of reports have been chosen and are maintained and updated under the sole responsibility of the Management, which is responsible for it and undertakes to ensure its functionality and technical suitability in terms of security against any intrusions and unauthorized access as well as against actions likely to affect the confidentiality, integrity and/or availability of the data and information processed through it.

11.3. Results of assessment

Once the verification phase has been completed, the Manager of the Report prepares a report summarising the investigations carried out, the methods used, the results of the plausibility verification and/or the investigation, the supporting elements collected, and the recommendations for an action plan. If the Report is dismissed, the reasons shall be specified.

The Manager of the Report responds, in any event, to the Whistleblower within 3 months of the date of notice of receipt and in any event within 3 months and 7 days, communicating to the Whistleblower the information relating to the status of the Report and any actions that are intended to be undertaken as a result of the report, taking into account the indications of the SB in the event of a report that has passed the first assessment.

Based on the outcome, the report is then shared with the Managers of the Company and the corporate functions involved based on the “need to know” principle (including the possibility of sharing an anonymised version of the document) to determine, in agreement with the competent functions, an action plan (where necessary) and/or any other measure to be taken (including any disciplinary measures against employees).

The documentation relating to each Report received, even if the investigations conclude that there are insufficient supporting elements, is kept in compliance with the confidentiality requirements according to the timing and methods established by the applicable regulations and this policy.

The Manager of the Report reports, at least every six months, on the number and type of Reports received and on the outcome of the activities carried out to the statutory corporate control and supervision bodies (where present), guaranteeing the anonymity of the subjects involved.

As part of this activity, it will also be evaluated whether the procedure described in this Policy is effective and achieves the defined objectives. If there are indications of changes in the operating environment or other elements that adversely affect the effectiveness of the Reporting process, the Company will evaluate any changes to the process itself.

In any event, in the absence of reports, the Manager of the Report carries out a test report every four months to verify the persistent functionality of the electronic reporting channel.

11.4. Protection of the Whistleblower and the person subject to reporting

11.4.1. Protection of the Whistleblower

The company, in compliance with the relevant legislation and in order to promote the dissemination of a culture of legality and encourage the reporting of offences, ensures the confidentiality of the whistleblower's personal data and the confidentiality of the information contained in the report and received from all parties involved in the procedure and also guarantees that the report does not in itself constitute a violation of the obligations arising from the employment relationship.

It is the task of the Manager and, subsequently, as the case may be, the SB, to guarantee the confidentiality of the whistleblower from the moment the report is taken in charge, even if it should later prove incorrect or unfounded.

Failure to comply with this obligation constitutes a breach of this procedure and exposes the Manager and/or, where appropriate, the SB or the members to whom the breach is attributable to liability.

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In particular, the company guarantees that the identity of the whistleblower cannot be revealed without his/her express consent and all those involved in the management of the report are required to protect his/her confidentiality except in the event where:

- the report is made for the purpose of damaging or otherwise harming the person subject to reporting (so-called “bad faith” report) and a liability by way of slander or defamation under the law arises;
- confidentiality is not enforceable by law (e.g. criminal investigations, etc.).

As regards, in particular, the scope of disciplinary proceedings, the identity of the whistleblower may not be disclosed where the allegation of the disciplinary charge is based on investigations that are separate from and additional to the report, even if consequent to it. If, on the other hand, the dispute is based, in whole or in part, on the Report and knowledge of the Whistleblower's identity is essential for the defence of the accused subject, the Report shall be usable for the purposes of disciplinary proceedings only in the presence of the Whistleblower's consent to the disclosure of his/her identity.

No form of direct or indirect retaliation or discriminatory measure on working conditions for reasons directly or indirectly connected to the complaint, is allowed or tolerated against the whistleblower. Discriminatory measures include unjustified disciplinary actions, demotions without justified reason, workplace harassment and any other form of retaliation which leads to uncomfortable or intolerable working conditions. The provisions of Article 13 of this Procedure apply.

11.4.2. Protection of the person subject to reporting

In accordance with current legislation, the Company has adopted the same forms of protection to guarantee the privacy for the Whistleblower also for the person allegedly responsible for the breach, without prejudice to any further form of liability provided for by law that imposes the obligation to communicate the name of the Whistleblower (e.g. requests from the judicial authority, etc.).

This document is without prejudice to the criminal and disciplinary liability of whistleblowers in “bad faith”, and any forms of abuse of this procedure, such as manifestly opportunistic Reports and/or Reports made for the sole purpose of harming the whistleblower or other persons, and any other circumstance of improper use or intentional instrumentalization of the institution covered by this procedure, shall also give rise to liability from a disciplinary perspective and in other competent instances. Finally, in relation to the protection of persons subject to reporting, with reference to the obligation to provide information, as specified by the “Guidelines on the protection of persons who report breaches of Union law and protection of persons who report breaches of national laws. - Procedures for the presentation and management of external reports.”, approved by Resolution No. 311 of 12 July 2023 (ANAC), it should be noted that in the phase of acquisition of the report and any subsequent investigation, no specific information should be provided to subjects other than the whistleblower. The aim is to prevent the activation of information flows from which it is possible to infer a person's involvement in a report from undermining the confidentiality protections provided for in the Decree.

12. Confidentiality

In encouraging Recipients to promptly report any breach, the Company guarantees the confidentiality of each Report and the information contained therein, including the identity of the Whistleblower, the Person(s) subject to reporting, the Facilitators (if any) and any other person involved. Their identities shall not be disclosed to anyone but the Manager of the Report, except:

- a) where they provide their explicit consent, or have intentionally disclosed their identity in other contexts;
- b) communication is a necessary and proportionate obligation in the context of investigations by the Authorities or judicial proceedings, in accordance with the applicable legislation.

With reference to letter a), it should be noted that the consent of the whistleblower must be requested in the following circumstances:

- > for disclosing the identity of the whistleblower and any other information from which the same may be inferred, directly or indirectly to persons other than those expressly authorised to process such data. It is understood that, in the context of criminal proceedings, the identity of the whistleblower is covered by secrecy in the manner and within the limits established by art. 329 of Italian Code of Criminal Procedure;
- > if knowledge of the identity of the whistleblower is indispensable for the defence of the accused in the context of a disciplinary dispute that is based, in whole or in part, on the report itself.

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The information contained in the Reports that constitute trade secrets may not be used or disclosed for purposes other than those necessary to resolve the Report.

As part of the reporting of illegal conducts and/or violations of the administrative liability management system, the company recognizes the protection of employees in the event of disclosure of information covered by the obligation of professional, company, scientific and industrial secrecy, provided that such disclosure takes place only and exclusively with respect to the Manager and/or the SB and in any event within the limits of what is strictly functional for the purpose of reporting.

The unauthorized disclosure of the identity of the whistleblower or the information based on which it can be inferred, constitutes a violation of this procedure and is a source of disciplinary responsibility, without prejudice to further forms of liability provided for by law.

13. Prohibition of retaliation or discrimination

The organisation condemns any form of retaliation and/or discrimination against whistleblowers. The following acts/facts/behaviours constitute retaliation, where they are carried out due to the report:

- a) dismissal, suspension or equivalent measures;
- b) demotion or non-promotion;
- c) change of functions, change of workplace, reduction of salary, change of working hours;
- d) suspension of training or any restriction of access to it;
- e) negative performance reviews or negative references;
- f) adoption of disciplinary measures or other sanctions, including financial penalties;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavourable treatment;
- i) failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;
- l) non-renewal or early termination of a fixed-term employment contract;
- m) damage, including to the person's reputation, in particular on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income;
- n) listing improperly on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in the sector or industry in the future;
- o) early conclusion or termination of the contract for the supply of goods or services;
- p) cancellation of a license or permit;
- q) the request to undergo psychiatric or medical examinations.

The Company undertakes to eliminate and in any event to compensate the effects of any retaliation against the whistleblowers. Retaliation constitutes a violation of the law and the Organizational Model and as such is a source of disciplinary responsibility.

The whistleblower also has the right to request the transfer to another office and, where reasonably possible, the Organisation must meet such requests.

Protection is limited to cases in which the whistleblower and person subject to reporting are both employees of the same Organisation.

The whistleblower who believes to have suffered discrimination reports the facts to the Manager of Reporting and/or the SB which, having assessed the existence of the necessary elements, reports the hypothesis of discrimination to the Management, so that it adopts the necessary measures to remedy the consequences of discrimination, as well as the disciplinary measures against the author of the retaliatory/discriminatory behaviour.

Where the retaliatory/discriminatory behaviour is carried out by the Management, the SB reports this circumstance to the President of the Board of Directors, so that he/she adopts the consequent measures to protect the whistleblower, as well as the disciplinary measures against the Director him/herself. In the event that the conduct is carried out by the Management, he/she shall report it to the Board of Statutory Auditors.

This procedure is without prejudice to the criminal and disciplinary liability of the whistleblower in the event of a libelous or defamatory report under Italian Criminal Code and for the consequent liabilities also under Article 2043 of Italian Civil Code.

Any abuse of this procedure for the purpose of harming the person subject to reporting or for opportunistic purposes shall also give rise to liability from a disciplinary perspective and in other competent instances.

The Company may take the most appropriate disciplinary and/or legal measures, to the extent permitted by applicable law, to protect its rights, assets and image, against anyone who has made false, unfounded or opportunistic Reports in bad faith and/or for the sole purpose of slandering, defaming or causing prejudice to the Person subject to reporting or other parties involved in the Report.

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14. Processing of personal data

Personal data (including any data belonging to particular categories, such as racial and ethnic origin, religious and philosophical beliefs, political opinions, membership of political parties or trade unions, as well as personal data suitable for revealing the state of health and sexual orientation, data relating to any crimes or criminal convictions) of the Whistleblowers and other subjects possibly involved, acquired during the management of the Reports, shall be processed for the fulfilment of the obligations imposed by the applicable legislation on whistleblowing, within the limits and with the guarantees provided for by this legislation, in full compliance with the provisions of the applicable regulations on the protection of personal data and with the provisions of the Company's Privacy Policy.

The processing of personal data will be carried out by the Manager of the Report and by the SB, as the case may be, (without prejudice to any specific regulations on the subject and any conflicts of interest), for the sole purpose of implementing the procedures established in this Policy.

According to the principles of "*privacy by design*" and "*privacy by default and minimization*", the Company has prepared confidential channels to receive Reports and manages them in a secure manner to guarantee the anonymity of the Whistleblower or the confidentiality of his/her identity and of any third party involved (except for the necessary and proportionate obligations in the context of investigations by the competent authorities or judicial proceedings).

The processing of personal data shall be limited to what is strictly necessary and proportionate to ensure the correct management of the Report and in any event no longer than is required by the applicable legislation.

If necessary, the information processing operations will be entrusted, under the supervision of the Manager of the Reporting, to duly authorized, instructed and specifically trained employees in relation to the execution of the whistleblowing procedure, with particular reference to security measures and the protection of the confidentiality of the subjects involved and the information contained in the Reports or to external specialists, in this circumstance adopting adequate contractual precautions.

The personal data contained in the Reports may be communicated by the Manager of the Report to the members of the SB when they make a reasoned request, as well as to the corporate bodies and internal functions that may be competent from time to time, as well as to the Judicial Authority and/or any other competent authority, or to duly authorized third parties, for the purpose of activating the procedures necessary to guarantee, as a result of the Report, suitable judicial and/or disciplinary action against the Person(s) subject to reporting, where the elements collected and the investigations carried out show the validity of the circumstances initially reported.

The exercise of the rights of data subjects provided for by the applicable legislation on the protection of personal data may be limited where necessary to ensure full compliance with the applicable Whistleblowing legislation and to protect the confidentiality of Reports and data subjects.

15. Registration and storage

In order to ensure the management and traceability of reports, the Manager of the Report and, where appropriate, the Supervisory Body shall keep a specific Register of reports, also in computerised form, ensuring the storage of the same and the accompanying documentation relating to the investigative activities in an appropriate place and in any event not at the Company's premises. In particular, the storage and management of all reports through the appropriate electronic portal is privileged, also in relation to the investigative documentation, where the portal allows this storage and registration function.

The personal data collected within the context of a report are kept for the time strictly necessary for their processing, and in any event compatible with the purpose of the processing, in compliance with the regulations in force on the protection of personal data. In particular, internal and external reports and the relevant documentation are kept for the time necessary to process the report and in any event no longer than five years of the date of communication of the final outcome of the reporting procedure, in accordance with the provisions of Italian Legislative Decree 24/2023. This is without prejudice to longer retention periods in other contexts arising, for example, from criminal or other proceedings resulting from the report, the duration of which exceeds the above-mentioned period of storage, in particular where the report has become part of the case files.

16. Documentation

The documents attached to this procedure are:

- PO.NG.GE.00.029.00 - Whistleblowing: reporting form
- Personal data processing policy pursuant to Article 13 Regulation 679/16 EU for whistleblowers
- Information pursuant to Article 14 Regulation 679/16 EU for persons subject to reporting and third parties
- Impact Assessment in relation to the processing of data carried out through the whistleblowing portal accessible at <https://novellinispa.signalact-inaz.it/whistleblowing/>