

**WHISTLEBLOWING PROCEDURE FOR THE ITALIAN COMPANIES BELONGING TO THE
DIASORIN GROUP**

(ADOPTED IN ACCORDANCE WITH LEGISLATIVE DECREE NO. 24 OF 10 MARCH 2023)

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1. Introduction

- 1.1. The DiaSorin Group (hereinafter, “**DiaSorin**” or the “**Group**”) has always been committed to complying with the highest levels of ethics and integrity in the conduct of its business and, under its Code of Ethics and Organisational Model pursuant to Legislative Decree no. 231/2021 (the “**Model**”), it has defined the ethical standards and principles of conduct to be adopted to safeguard integrity in the conduct of business.
- 1.2. Drawing inspiration from these principles, DiaSorin intends to ensure effective, full and actual compliance with the founding values of its business action, also by setting up appropriate communication channels enabling anyone interested to report any conduct in conflict with both national and European legal and regulatory provisions.
- 1.3. The Company therefore intends to adopt a whistleblowing procedure (the “**Procedure**”) that, in compliance with the applicable laws, sets out appropriate channels for processing complaints of potential breaches, offences or conduct (also mere omissions) that do not comply with or infringe national or European Union laws and regulations, the Decree, the 231 Model and the Code of Ethics.

2. Definitions

- “**Whistleblowing Committee**”: the collective body as composed in accordance with paragraphs 8.2 and 8.3 of the Procedure.
- “**Code of Ethics**”: the DiaSorin Group’s code of ethics.
- “**Work Context**”: the work or professional activities, present or past, carried out within the framework of the work relationships identified by Legislative Decree 24/2023, through which, irrespective of the nature of such activities, a person acquires information on breaches and in the context of which they could risk suffering retaliation in the event of a whistleblowing complaint, public disclosure or report to the judicial or accounting authorities;
- “**Decree**”: Legislative Decree no. 231/2001, as subsequently amended and supplemented;
- “**Public Disclosure**”: the act of making information about Breaches publicly available through, for example, the media or social networks.
- “**Facilitator**”: a natural person who assists a whistleblower in the whistleblowing complaint process, operating within the same work context and whose assistance must be kept confidential;
- “**Model**”: the organisation, management and control model adopted by DiaSorin in order to prevent the commission of the predicate offences identified in the Decree and following the crime risk analysis activities conducted periodically by each Company.
- “**Supervisory Body**”: the Supervisory Body appointed by each Company in the framework of the implementation of the provisions of the Decree.

- “**Procedure**” means this whistleblowing procedure.
- “**Whistleblower**”: the natural person who reports one or more Breaches.
- “**Reported Person**”: the natural or legal person mentioned in the internal or external whistleblowing complaint or in the public disclosure as the person to whom the Breach is attributed or as a person otherwise implicated in the reported or publicly disclosed breach;
- “**Retaliation**” means any conduct, act or omission, even if only attempted or threatened, occurring by reason of the whistleblowing complaint, judicial or accounting authority report or public disclosure and which causes or is likely to cause the whistleblower or the person making the report, directly or indirectly, unjust damage;
- “**Whistleblowing Complaint**” means the communication of possible wrongful conduct, either acts or omissions, that constitutes or may constitute a Breach, or the inducement to commit a Breach.
- “**Company**”: the Italian companies of the DiaSorin Group and, specifically, DiaSorin S.p.A. or DiaSorin Italia S.p.A., as the case may be.
- “**Breach**” means conduct, even of a merely omissive nature, carried out in breach of (i) national or European Union laws and regulations, (ii) the Decree, (iii) the 231 Model, (iv) the Code of Ethics. In particular, pursuant to Article 2, paragraph I, letter a) of Legislative Decree no. 24/2023, the aforesaid breaches consist of (1) administrative, accounting, civil or criminal offences that do not fall under numbers 3), 4), 5) and 6); (2) unlawful conduct relevant pursuant to Legislative Decree no. 231 of 8 June 2001, or breaches of the organisation and management models provided for therein, which do not fall under numbers 3), 4), 5) and 6); (3) offences falling within the scope of the European Union or national laws indicated in the annex to this Decree or national laws constituting implementation of the European Union laws indicated in the annex to Directive (EU) 2019/1937, although not indicated in the annex to this Decree, relating to the following sectors: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems; (4) acts or omissions affecting the financial interests of the European Union as referred to in Article 325 of the Treaty on the Functioning of the European Union specified in relevant secondary Union law; (5) acts or omissions affecting the internal market, as referred to in Article 26, paragraph 2 of the Treaty on the Functioning of the European Union, including breaches of European Union competition and State aid rules, as well as breaches affecting the internal market related to acts infringing corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax rules; (6) acts or conduct that frustrate the object or purpose of the provisions of European Union laws in the areas indicated in points (3), (4) and (5).

On the other hand, pursuant to Article 1(II) of Legislative Decree no. 24/2023, the following are not breaches and cannot be the subject of a whistleblowing complaint (a) disputes, claims or requests linked to an interest of a personal nature of the whistleblower or of the person lodging a complaint with the judicial or accounting authorities that relate exclusively to their individual employment relationship or even only concerning them (b) procedures for reporting breaches where these are already mandatorily regulated by national or European Union provisions; (c) reports of breaches relating to national security, as well as to contracts relating to defence or national security aspects, unless these aspects are covered by the relevant secondary legislation of the European Union.

- **“Whistleblowing”** means any information flow through which Whistleblowers can report potential Breaches.

3. Purpose and Scope

3.1. The purpose of the Procedure is to describe and regulate the organisational and managerial aspects relating to the Whistleblowing Complaint on Breaches by employees, independent contractors, members of corporate bodies, consultants, and in general third parties linked to the Company by agreements ties within the scope of the employment or independent contractor relationship.

3.2. Specifically, the Procedure aims to:

- (a) make Whistleblowers aware that it is possible to report potential Breaches;
- (b) illustrate and define how to lodge a whistleblowing complaint and which protections are guaranteed to Whistleblowers who have made a Whistleblowing Complaint;
- (c) define the procedures, functions and timeframes for processing the individual Whistleblowing Complaint.

3.3. The purposes described above are implemented by means of:

- (a) the adoption and implementation (in addition to the direct reporting channel to the Supervisory Body provided for by the 231 Model) of an IT channel for sending Whistleblowing Complaints, enabling directors, employees and, in general, any Whistleblower, to submit - in order to protect the integrity of the Company - detailed reports of Breaches of which they have become aware by reason of their duties;
- (b) the prohibition of retaliation or discriminatory, direct or indirect, acts against the Whistleblower for reasons, directly or indirectly, related to the Whistleblowing Complaint;

- (c) the application of sanctions for those who breach the measures to protect the Whistleblower, as well as those who make intentional or grossly negligent reports that prove to be unfounded.

3.4. The application of this Procedure and the whistleblowing complaints made in accordance with it shall not affect, nor limit in any way, the obligations to report to the Competent Authorities, nor the obligations to report to the control bodies set up by the Company itself. In particular, all the above-mentioned persons involved in the handling of the Whistleblowing Complaint must have received adequate training in privacy matters.

4. Whistleblowers

4.1. Within the meaning and for the purposes of Legislative Decree no. 24/2023, “**Whistleblowers**” includes all those persons who make a whistleblowing complaint or public disclosure of information on breaches of which they have become aware in the context of their work context or independent contractor relationship, such as, by way of example but not limited to:

- (a) employees of the Company;
- (b) self-employed workers who work for the Company;
- (c) independent contractors, freelancers and consultants working for the Company, including agents and distributors;
- (d) volunteers and paid and unpaid trainees of the Company;
- (e) shareholders and persons performing administration, management, control, supervision or representation duties, even if such duties are exercised in a *de facto* capacity for the Company.

4.2. Whistleblowers are entitled - and are subject to the protections provided for in this Procedure - to lodge a whistleblowing complaint or, alternatively, if the conditions set out in paragraph 7 are met, to disclose to the public the information of which they have become aware:

- (a) when the legal relationship is ongoing;
- (b) during the work trial period;
- (c) when the legal relationship has not yet begun, if information on breaches was acquired during the selection process or at other pre-contractual stages;

- (d) after the termination of the legal relationship, if the information on breaches was acquired before the termination of the relationship.

5. Rules of Conduct

5.1. Whistleblowers must:

- (a) make bona fide, substantiated reports based on precise and consistent circumstances;
- (b) refrain from making unsubstantiated or lacking Whistleblowing Complaints, based on unconfirmed rumours or hearsay, or Whistleblowing Complaints that are not relevant to the Breaches relevant to the Procedure;
- (c) not use Whistleblowing Complaints as tools to solve mere personal problems or for the sole purpose of harming the Reported Person or for opportunistic reasons.

5.2. The Company, upon receipt of the Whistleblowing Complaint, shall:

- (a) take the Whistleblowing Complaints into consideration and assess them with care and attention;
- (b) ensure the confidentiality of the identity and personal data of the Whistleblower and the Reported Person in the handling of the Whistleblowing Complaint;
- (c) avoid direct or indirect acts of retaliation and discrimination against the Whistleblower, even in the event that the Whistleblowing Complaint, although made in good faith and in line with the provisions of paragraph 6, proves to be unfounded;
- (d) ensure the traceability of the process relating to the assessment of the Whistleblowing Complaint and the adoption of any consequent measures.

5.3. The Whistleblower is aware of the liability envisaged in the event of false declarations or the creation or use of false or untrue documents or information. If, following internal verifications, the Whistleblowing Complaint proves to be unfounded, investigations shall be carried out to determine whether there is gross negligence or intent in respect of the undue Whistleblowing Complaint and, if so, disciplinary action shall be taken, also in accordance with the Model's system of sanctions against the Whistleblower, unless they produce further elements in support of their Whistleblowing Complaint capable of excluding the existence of intent or gross negligence.

6. The Whistleblowing Complaint

- 6.1. The Whistleblowing Complaint may not concern information already in the public domain, nor personal complaints of the Whistleblower, whether or not related to the employment relationship.
- 6.2. No Whistleblowing Complaint may be lodged anonymously, it being understood that the identity of the Whistleblower and the confidentiality of communications will always be protected in accordance with the law.
- 6.3. In particular, the identity of the Whistleblower and any element or information from which the identity of the Whistleblower may be deduced - directly or indirectly - shall not be disclosed to persons other than those in charge of processing the Whistleblowing Complaint according to the Procedure.
- 6.4. The identity of the Whistleblower shall not be disclosed to third parties, not even in the context of any disciplinary proceedings, if the charge is based on findings that are separate from and additional to the factual circumstances that are the subject of the Whistleblowing Complaint.
- 6.5. If the allegation is based on the Whistleblowing Complaint and knowledge of the identity of the Whistleblower is indispensable for the accused's defence, the Whistleblowing Complaint and the factual circumstances described therein shall be available for the purposes of the disciplinary proceedings only if the Whistleblower expressly consents to the disclosure of their identity. In the event of refusal of the consent given by the Whistleblower, it will not be possible to follow up the Whistleblowing Complaint, except in cases where further elements have come to light that allow the disciplinary proceedings to be pursued independently.
- 6.6. The Whistleblowing Complaint may concern (i) employees and independent contractors in any capacity whatsoever of the Company, (ii) members of the corporate bodies (Board of Directors, Board of Statutory Auditors, Auditing Firm and any and all other internal corporate bodies), (iii) third parties who have - or have had - a contractual relationship with the Company, such as, by way of example but not limited to, suppliers, agents, distributors, contractors and subcontractors, consultants, customers.
- 6.7. The Whistleblowing Complaint must provide as much detail as possible on the facts reported, indicating the time and place of their commission, the person responsible or, if more than one, the persons responsible for the facts themselves, as well as any documents proving the same facts, in order to allow an appropriate verification of the validity of the Whistleblowing Complaint.
- 6.8. In view of the purpose of the Procedure and in light of the importance of lodging Whistleblowing Complaints on possible breaches in the Company's corporate

organisation, an electronic web platform called “EQS Integrity Line” has been set up, which can be reached at the Internet address <https://diasorin.integrityline.com/>).

6.9. The Whistleblower may at any time supplement, rectify or complete the Whistleblowing Complaint made or add further evidence, including documentary evidence, through the same channel through which they sent the Whistleblowing Complaint.

7. Public Disclosure

7.1. The Whistleblower may make a public disclosure of the Whistleblowing Complaint and benefit from the protection provided for in paragraph 12 of the Procedure if, at the time of the public disclosure, at least one of the following conditions is met:

(a) the Whistleblower has previously lodged a Whistleblowing Complaint through an internal channel and no reply has been received within the time limits set out in paragraph 8.13 below;

(b) the Whistleblower has a well-founded reason to believe that the breach may constitute an imminent and obvious danger to the public interest.

8. Processing the Whistleblowing Complaint

8.1. In order to make the Whistleblowing system effective, the Company has set up an internal Whistleblowing Committee to address and processing Whistleblowing Complaints.

8.2. In particular, the Whistleblowing Committee is a collective body, composed of three internal members and one member from outside the Company.

8.3. More specifically, the three members are the *pro-tempore* heads of Corporate Internal Audit, Corporate Legal Affairs and the Senior Corporate V.P. Human Resources.

8.4. In processing individual Whistleblowing Complaints, the Whistleblowing Committee may avail itself of support staff from the Corporate Internal Audit, Corporate Legal Affairs or Corporate HR departments, who have the necessary training requirements for handling the Whistleblowing Complaint and the relevant channel.

8.5. Upon receipt of the Whistleblowing Complaint, the Whistleblowing Committee shall, without delay and in any event no later than seven days from the date of receipt, send an acknowledgement of receipt and acknowledgement to the Whistleblower. The acknowledgement of receipt will also contain indications concerning the processing of the Whistleblowing Complaint.

- 8.6. The Whistleblowing Committee, upon receipt of the Whistleblowing Complaint, shall diligently follow it up and, in particular, by always maintaining an open dialogue with the Whistleblower and requesting from them any clarification or supplement of documents or information, shall verify (i) the completeness of the Whistleblowing Complaint, (ii) the existence of the legal and factual conditions in compliance with the provisions of the Decree and the rules contained in the Model and in the corporate policies, (iii) the seriousness of the facts reported and the possible urgency in investigating the Whistleblowing Complaint. In any event, the Whistleblowing Committee must inform the Supervisory Body in writing of the receipt of the Whistleblowing Complaint, indicating the facts and circumstances contained in the Whistleblowing Complaint, as well as any documents annexed thereto.
- 8.7. In the event that the Whistleblowing Committee considers that the Whistleblowing Complaint is manifestly unfounded, it will decide to dismiss the Whistleblowing Complaint, informing the Whistleblower in writing (within the time limit set out in paragraph 8.13 below) and the Supervisory Body; in the report, the Whistleblowing Committee must indicate the circumstances and facts which are the subject of the Whistleblowing Complaint and the reasons for its dismissal.
- 8.8. Conversely, should the Whistleblowing Committee consider the Whistleblowing Complaint to be not manifestly unfounded, it shall initiate a preliminary investigation phase, immediately analysing and assessing the merits of the Whistleblowing Complaint. In this phase, the Whistleblowing Committee - always in full compliance with the provisions on the protection of the Whistleblowing Person set out in this Procedure - may carry out the necessary investigations with other corporate functions and may also ask the Whistleblower for further elements or insights.
- 8.9. The Whistleblowing Committee may carry out such checks and investigations as it deems appropriate, also resorting to external consultants.
- 8.10. At the end of the analysis stage, the Whistleblowing Committee shall prepare a written memorandum (the “**Memorandum**”) and submit it to the Supervisory Body. This report should state:
- (a) a factual reconstruction of what is alleged in the Whistleblowing Complaint (place and date of the events, evidence and documents);
 - (b) the verifications carried out, their outcomes and the company or third party involved in the analysis phase;
 - (c) a summary evaluation of the analysis process with an indication of the cases established and the reasons for them;

(d) the outcome of the analysis (filing or substantiation of the Whistleblowing Complaint).

8.11. If, following the investigations, the Whistleblowing Complaint proves to be well-founded, the Whistleblowing Committee will inform the persons in charge (e.g. the Chief Executive Officer, the Head of HR, the Head of Procurement, the Head of Sales, etc.) of the outcome of the investigations, forwarding them the Memorandum, so that they may assess whether it is necessary to adopt any disciplinary measures or contractual remedies.

8.12. If the preliminary investigation phases reveal the need for corrective action, the heads of the areas and processes subject to verification will be required to define a corrective action plan that provides for the implementation of the necessary safeguards for the removal of the issues detected and the strengthening of the process. The Whistleblowing Committee, together with the Supervisory Body and with the support of the Corporate Internal Audit department, will monitor its implementation.

8.13. In any event, the Whistleblowing Committee shall provide a reply to the Whistleblowing Complaint on its merits within and no later than three months from the date of the acknowledgement of receipt referred to in paragraph 8.5 above or, in the absence of such acknowledgement, within and no later than three months from the expiry of the period of seven days from the date of submission of the Whistleblowing Complaint.

9. Disciplinary Measures - Contractual Remedies *vis-à-vis* Third Parties

9.1. If the investigations show liability on the part of an employee, the Head of HR, in accordance with the provisions of the Model, will assess, with the assistance of the Supervisory Body, if necessary, whether or not to initiate disciplinary proceedings against the Reported Persons deemed responsible for the Breach following the analysis carried out and the assessment made by the Whistleblowing Committee.

9.2. The disciplinary measures adopted shall be those provided for in Article 5 of the General Part of the Model.

9.3. The Human Resources Department will also assess, with the assistance of the Supervisory Body, if necessary, whether to take measures:

(a) against the Whistleblower who has made the Whistleblowing Complaint acting with intent or gross negligence or who has been convicted of libel or slander;

(b) against any persons responsible for retaliatory or discriminatory conduct *vis-à-vis* the Whistleblower;

- (c) against persons involved in the process of assessing and analysing the Whistleblowing Complaint who have breached confidentiality obligations or have failed to consider the Whistleblowing Complaint received.
- 9.4. Without prejudice to the application of the special rules provided for in the General Part of the Model, the disciplinary measures adopted for the cases indicated in paragraphs (a), (b) and (c) above shall be those provided for in the applicable Collective Bargaining Agreement, imposed on the basis of the Workers' Statute, in compliance with the company disciplinary system and the principle of proportionality.
- 9.5. Should the investigations find liability on the part of a supplier or other third party external to the organisational structure, the competent corporate department shall assess the application of contractual remedies, according to a gradual scale proportionate to the seriousness of the breach.
- 9.6. If the facts set out in the Whistleblowing Complaint prove to be well-founded at the end of the investigation and the conditions are met, the Company shall also follow up the Whistleblowing Complaint by informing the competent authorities, through the relevant corporate departments.

10. Confidentiality

- 10.1. The Company guarantees the confidentiality of the Whistleblower and of the data and information transmitted, in order to protect the Whistleblower from any form of retaliation or discrimination. In particular, all data, information, factual circumstances and any documents in support of the Whistleblowing Complaint may not be used by the Company, the Whistleblowing Committee and the Supervisory Body (and, more generally, by any third party that has legitimately become aware of the Whistleblowing Complaint and of such facts and circumstances) except within the timeframe and for the purposes strictly necessary to follow up the Whistleblowing Complaint itself.
- 10.2. The identity of the Whistleblower, as well as any information, factual circumstance and documentation contained or not contained in the Whistleblowing Complaint from which the identity of the Whistleblower may be directly or indirectly inferred, may in no way be disclosed or revealed to persons other than the members of the Whistleblowing Committee and of the Supervisory Body without the prior written consent of the Whistleblower, it being understood that they must be expressly authorised to process personal data in accordance with the provisions on the processing of personal data.
- 10.3. In any criminal proceedings, the identity of the Whistleblower will be covered by secrecy in the manner and within the limits of Article 329 of the Italian Code of Criminal Procedure.

- 10.4. The identity of the Whistleblower, the Whistleblowing Complaint, the factual circumstances that are the subject of the Whistleblowing Complaint, and the documents and information contained therein may not be disclosed in the context of any civil proceedings in the absence of an order from the Judicial Authority.

11. Processing of Personal Data

- 11.1. The Company guarantees full compliance with the provisions in force concerning the processing of personal data and, in particular, the Company, the Whistleblowing Committee and the Supervisory Body define their own model for receiving and managing Whistleblowing Complaints by identifying technical and organisational measures suitable for guaranteeing a level of security appropriate to the specific risks connected with and arising from the processing of personal data carried out on the basis of a data protection impact assessment.
- 11.2. In any event, any processing of personal data as a consequence of the Whistleblowing Complaint and, more generally, of this Procedure, as well as any internal communication (from the Whistleblowing Committee to the Supervisory Body and/or to the management functions of the Company) or external communication (to the competent Judicial or Administrative Authorities) shall be carried out in full compliance with the provisions of the law on the processing of personal data. In particular, the persons entitled to receive the Whistleblowing Complaint, to deal with it and to the subsequent investigation (i.e. the members of the Whistleblowing Committee, the Supervisory Body and the management functions of the Company) are considered to be the data controllers in accordance with the applicable legal provisions, and must provide the Whistleblower and the persons involved with all the information required by the aforementioned provisions of the law, adopting all the protection measures provided therein.
- 11.3. Personal data contained in or derived from the Whistleblowing Complaint that are not strictly indispensable to the investigation and processing of the Whistleblowing Complaint will not be collected or, if accidentally collected, will be immediately destroyed.

12. Protection Measures – No Retaliation – No Discrimination

- 12.1. The Company, aware of the importance of any Whistleblowing Complaint in order to fully and effectively implement the principles of transparency and fairness in the conduct of business, promotes and adopts a series of protective measures aimed at protecting the Whistleblower from the risk of retaliatory or discriminatory actions on account of their Whistleblowing Complaint, in full compliance with the provisions of the law in force on whistleblowing. Pursuant to Article 3(V) of Legislative Decree no. 24/2023, the same protection measures also apply: “a) to the Facilitators; b) to the persons in the same Work

Context as the Whistleblower, the person who filed a complaint to the judicial or accounting authorities or the person who made a public disclosure and who are linked to them by a stable emotional or kinship link up to the fourth degree; c) the co-workers of the reporting person or of the Whistleblower, who work in the same Work Context as the Whistleblower and who have a habitual and current relationship with the said person; d) the entities owned by the whistleblower or by the person who filed a complaint to the judicial or accounting authority or who made a public disclosure, or for which the said persons work, as well as the entities operating in the same work context as the said persons”.

12.2. In particular, the following shall be considered as retaliatory actions where they are carried out by reason of or as a consequence of the Whistleblowing Complaint, without limitation:

- (a) dismissal, suspension or equivalent measures;
- (b) change of duties, change of workplace, demotion, reduction of salary, change of working hours;
- (c) suspension from participation in training events or any restriction of access thereto;
- (d) negative comments or negative references;
- (e) the adoption of disciplinary measures or other sanctions, including fines;
- (f) coercion, intimidation, harassment of any kind or ostracism within the company organisation;
- (g) discrimination or unfavourable treatment compared to other persons in the same department of the company organisation;
- (h) the failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the Whistleblower had the right or at least a legitimate expectation of conversion;
- (i) non-renewal or termination (in whatever form) of a fixed-term employment contract;
- (j) causing economic or financial damage as a result of the dissemination - including via social media - of information likely to bring the reputation of the Whistleblower into disrepute;

- (k) the inclusion of the Whistleblower in lists - formal or informal - drawn up also on the basis of legitimate business agreements in the sector that may result in the Whistleblower being unable to relocate in the same industrial sector in which the Company operates;
- (l) the early conclusion, in whatever form, of contracts for the provision of services or the supply of goods;
- (m) requiring the Whistleblower to undergo a medical investigation of any kind or a psychiatric examination.

12.3. Without prejudice to the aforementioned provisions on the prohibition of retaliation and discrimination to protect the Whistleblower, where the liability of the Whistleblower for the offences of defamation or slander is ascertained by a judgement, even if only at first instance, or where the Whistleblower is convicted in civil court for having made the Whistleblowing Complaint with intent or gross negligence, which turned out to be unfounded, the Whistleblower shall not be entitled to the protections provided for in this article, and the Company may impose all the disciplinary sanctions provided for by the reference rules in force.

12.4. In any case, the Whistleblower - in addition to the protections provided for by our legal system with reference to the right to report to the Judicial Authorities, both in criminal and in civil or administrative proceedings - may inform ANAC [*Autorità nazionale anticorruzione*, Italian Anti-corruption Authority] of the factual circumstances that, in its opinion, have led to retaliatory or discriminatory conduct as a consequence of the Whistleblowing Complaint.

12.5. Waivers and settlements, in whole or in part, with respect to the rights and protections provided for in the decree are invalid unless they are made in the protected venues referred to in Art. 2113, paragraph IV of the Italian Civil Code.

13. Document Storage - Record Keeping

13.1. The Company shall keep all documentation pertaining to individual Whistleblowing Complaints for as long as is necessary for the processing of the Whistleblowing Complaint itself, including in judicial proceedings, and, in the event that the Whistleblowing Complaint is deemed unfounded, such documentation shall be kept for a maximum of five years from the date of the Whistleblowing Complaint itself. The storage of this documentation will, in any case, always be in full compliance with the legal provisions on the processing of personal data.

In the event that - at the request of the Whistleblower - the latter should be heard as part of the investigative proceedings following the Whistleblowing Complaint, this circumstance should be recorded in a special minute signed by all those present and, in particular, by the Whistleblower, it being understood that - again at the request and with the consent of the Whistleblower - such hearings may also be recorded on computer and/or documented by video or voice recording.