

In force as of 17/12/2023

Whistleblowing Management Policy of
the company **Confezioni e Facon S.r.l.**,
abbreviated as Cieffe S.r.l.

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Introduction

Cieffe S.r.l., hereinafter referred to as the “Company”, undertakes to guarantee protection against any form of retaliation to all employees and all parties who, operating within its organisation, may encounter and report any irregularity. We invite whistleblowers to use the Company's internal reporting channel to facilitate the resolution of problems encountered. The Company is committed to ensuring that the violations reported are treated with discretion and confidentiality, guaranteeing the utmost protection and providing appropriate feedback throughout the process. Of course, anyone can make use of external reporting channels, as well as Law Enforcement, in the most serious cases.

1. Entry into force of the regulation and public disclosure

- 1.1 The policy will enter into force on 17-12-2023. With the entry into force of this policy, all provisions previously adopted on this matter, communicated in whatever form, are to be considered repealed and superseded by the present ones.
- 1.2 A copy of the regulation may be posted on the company notice board and/or made available on the company intranet and/or attached to the communication (possibly also in other forms) formalising its adoption and with the procedures in use at the Company.

2. Scope of application of the regulation

This process concerns whistleblowers. Whistleblowers are people who cooperate or have close relations with the company and who detect irregularities and report them.

Such persons may be: employees, candidates, temporary workers, external collaborators, contractors and subcontractors, external consultants and all those who could potentially be threatened with retaliation against their economic, employment, professional, reputational or other interests.

The protection provided by this policy is also guaranteed to persons who assist the whistleblower in the reporting process (facilitators), third parties associated with the whistleblower (colleagues or relatives) and those who might suffer retaliation in the workplace.

For the purposes of the provisions set forth in Italian Legislative Decree 24/2023 referred to as the “whistleblowing process”.

3. What to report

The internal reporting channel is intended for reports where a whistleblower has a suspicion about actual or potential violations and/or irregularities that have occurred, are currently taking place, took place in the past or are very likely to occur, and about attempts to conceal such violations.

A violation/irregularity is any act or omission that is illegal and related to the company, or that undermines the subject or purpose of legislation, company policies and/or internal regulations. A violation may include, but is not limited to, the following:

- bribery or corruption
- fraud, money laundering, theft or misuse of company assets or funds,
- undeclared or poorly managed conflicts of interest,
- anti-competitive conduct,
- insider trading or market abuse,
- violation of sanctions,
- financial irregularities,
- data privacy violations,
- gross negligence, bullying, unlawful discrimination, workplace or sexual harassment,
- gross waste or mismanagement,
- unsafe working practices and other significant safety or health problems,
- modern slavery and human rights violations,
- significant damage to the environment,
- retaliation against a whistleblower or other person protected pursuant to this policy,
- any other behaviour that is unethical, in violation of company policies or procedures or illegal.

4. How to report

Authorised personnel (see below) are available to provide support or advice on the company's whistleblowing process.

4.1 Whistleblowing channels

Reports may be submitted using the following means:

- electronically, by accessing the dedicated application, from the company website, <https://www.cieffemilano.it/whistleblowing/>

- by telephone by calling the following number: 0374.84794 (extension 298), answered by Ms Marina Forte, *Cieffe Human Resources Manager*;

- by post, by sending a registered letter with advice of receipt to the following address:

FAO Ms Marina Forte

CONFEZIONI E FAÇON S.R.L., abbreviated as CIEFFE S.r.l.

via dell'Artigianato 23, 26029 Soncino (CR).

It is preferable for the whistleblower to initially use the internal whistleblowing channel provided by the Company. However, in certain cases, the whistleblower has the option of directly contacting the ANAC (National Anti-Corruption Authority - www.anticorruzione.it). Other external whistleblowing channels include public disclosure and/or reporting to the judicial or accounting authorities.

The following conditions justify external whistleblowing to the ANAC:

the internal whistleblowing channel set up is not active or does not comply with regulations;

no feedback was received from an initial internal report;

it is believed that an internal report may not be effective or may lead to retaliation;

there is a well-founded reason to believe that the violation poses an imminent or obvious danger to the public interest.

The following conditions justify public disclosure:

there was no response by the deadline, after one internal and one external report;

there is a well-founded reason to believe that the violation poses an imminent or obvious danger to the public interest;

it is believed that the report, whether internal or external, may lead to retaliation or may not be effective (e.g. concealment or destruction of evidence) or assumed collusion between the party committing the violation and the party receiving the report.

5. Content and identity of the whistleblower

A report should include as much detail as possible about who, what, where, when, how and why in relation to the reported violation, as well as any supporting evidence. Any further information on how the company might best proceed to investigate the reported violation is welcome.

Whistleblowers will need to enter their identity in the procedure, but anonymity will be guaranteed through only two-way communication with the whistleblowing manager.

Without explicit whistleblower consent, the identity of whistleblowers, as well as any other information from which their identity may be directly or indirectly inferred, must not be disclosed to anyone other than authorised personnel and personnel responsible for receiving and following up on reports. Notwithstanding what is set forth above, the Company must disclose the whistleblower's identity when required by law, informing the whistleblower prior to such disclosure, unless this information would jeopardise the relative investigation or judicial proceedings.

Unauthorised attempts to identify a whistleblower or a person concerned are not permitted and will be subject to disciplinary sanctions.

6. How reports are processed and by whom

6.1 Authorised personnel

The Company's internal reporting channel is managed by Ms Marina Forte, Head of Human Resources, who is authorised to receive and follow up on reports (hereinafter referred to as authorised personnel).

Authorised personnel have direct, free and confidential access to the Management of the Company to which they report directly on the performance of the whistleblowing system. Authorised personnel have direct and unrestricted access to the appropriate resources necessary to ensure the impartiality, integrity and transparency of the whistleblowing system and its processes.

6.2 Report processing

Reports are processed in the following stages, depending on the content and nature of the report:

received - the report was received by the Company;

initial triage - the content of the report is assessed for categorisation purposes, taking preliminary measures, prioritising and assigning additional tasks required to process the report. If a report is found to be false, unfounded or irrelevant to the process established by regulations, a justified rejection response is sent;

processed - the report is being dealt with, the accuracy of the allegation is being assessed, an internal investigation or action to recover funds is underway;

under investigation - the allegation is under investigation;

closed - report processing has been completed; or no action is deemed necessary in response to a report, the assessment of the facts finds that no further investigation is warranted, the report is sent to another process to be dealt with or the investigation has been completed (regardless of whether or not the violation is confirmed).

The Company aims to process reports in a timely manner. Circumstances such as the complexity of the violation reported, competing priorities and other compelling reasons may require an extended period to complete report processing.

The Company processes reports confidentially, impartially and without bias or prejudice towards the whistleblower or any other person involved in or witness to the reported violation.

The persons concerned, i.e. the persons named in the complaints, are afforded the presumption of innocence. The respective reports may be disclosed to them at the appropriate time. Any investigation must be conducted in a manner that preserves confidentiality to the extent possible and appropriate to ensure that the persons concerned are not exposed to reputational damage (information is shared on a strict need-to-know basis).

7. Communication with whistleblowers

After submitting a report, the whistleblower will receive an acknowledgement of receipt no later than **seven days** after its receipt, regardless of the means used.

Confirmation of receipt of the report via the online platform is provided in the whistleblower's mailbox accessible on the same platform, using the access credentials provided to the whistleblower at the end of the whistleblowing process. Credentials are also provided to anonymous reporters.

Authorised personnel communicate with the whistleblower and, where necessary, request further information or evidence and provide feedback to the whistleblower. This communication takes place via the whistleblower's mailbox on the platform, or via other communication channels agreed upon with the whistleblower.

The personnel responsible for managing whistleblowing reports are entitled to know the identity of the whistleblower and, if the whistleblower does not provide it, the report may be dismissed. In any case, the Company will be required to inform the whistleblower of the decision taken.

An initial reply is provided to the whistleblower within 3 months of submission of the report, or 6 months if there are justified and substantiated reasons. The reply includes information on the action planned or taken as follow-up and the reasons for such follow-up. Feedback may be limited to avoid compromising any investigations or other legal proceedings, as well as due to legal restrictions on what may be communicated regarding the follow-up and results. In this case and where possible, the whistleblower will be informed of the reasons for the limited reply.

In any event, the whistleblower will be informed of the final outcome.

8. How whistleblowers are protected against retaliation

Retaliation is defined as any threatened, proposed or actual, direct or indirect act or omission that occurs in a work context, is motivated by internal or external the whistleblowing reports or public disclosure, and causes or is likely to cause unjustified harm to the whistleblower.

Some examples of retaliation are provided below:

- suspension, layoff, dismissal or equivalent measures;
- demotion or denial of promotion;
- change of job and/or place of work, reduction in salary, change in working hours;
- denial of training;
- negative performance evaluation or negative work reference;
- imposition or administration of any disciplinary measure, reprimand or other sanction, including a fine;
- coercion, intimidation, harassment or ostracism, isolation;
- discrimination, disadvantageous or unfair treatment;
- disclosure of the whistleblower's identity;
- failure to convert a temporary employment contract into a permanent employment contract, if the employee had legitimate expectations that he or she would be offered permanent employment;
- non-renewal or early termination of a temporary employment contract;
- damage, including to the person's reputation, particularly on social media, or financial loss, including loss of business and income;
- blacklisting on the basis of a formal or informal industry agreement, which may result in the person being unable to find future work in the sector or industry;
- early termination or cancellation of a contract for goods or services;
- cancellation of a licence or permit;
- psychiatric or medical referrals.

The Company does not tolerate retaliation of any kind and takes preventive action to ensure that it does not take place.

Any form of retaliation, including threats, is prohibited and must be reported immediately. Such reports may be sent using the Company's internal whistleblowing channel.

Anyone involved in retaliation could face serious internal and potentially external consequences pursuant to applicable laws or regulations. If the Company identifies anyone involved in retaliation, these individuals will be subject to disciplinary action, which could include dismissal.

Action to deal with a violation or offence by the whistleblower, unrelated to his or her role in the complaint, is not considered retaliation.

The Company takes all reasonable measures to protect whistleblowers from retaliation.

If it is confirmed that retaliation is occurring or has occurred, the Company shall take reasonable steps to stop and deal with such conduct and support the whistleblower by reversing its negative effect. Some examples:

reinstate the whistleblower in the same or equivalent position, with equal pay, responsibility, job and reputation;

facilitate equal access to promotion, training, opportunities, benefits and rights; withdraw litigation; pursue an action for compensation for damages suffered.

Following the report, the authorised personnel carry out an assessment of the risk of retaliation against the whistleblower. Depending on the likely sources of harm identified via the risk assessment, the authorised personnel identify and implement strategies and actions to prevent retaliation or limit the retaliatory behaviour identified, such as:

- protecting the whistleblower's identity;
- sharing information on a strictly need-to-know basis;
- communicating regularly with the whistleblower;
- providing emotional, financial, legal or reputational support throughout the process;
- encouraging and reassuring the whistleblower about the importance of reporting the violation and taking measures to promote his or her well-being;
- changing the workplace or whistleblowing procedures;
- notifying the parties concerned or others that retaliatory behaviour or breaches of confidentiality may constitute a disciplinary offence.

Authorised personnel monitor risks at the various stages of the process, e.g. when deciding to investigate, during the investigation, once the outcome of an investigation is known and after the case is closed.

The protections provided by this policy apply to the whistleblower even if the violation reported is unsubstantiated, if the whistleblower had reasonable grounds to believe that the information about the violation reported was true at the time the report was made. In addition, whistleblowers who have reported or publicly disclosed information about violations anonymously, but who are later identified and suffer retaliation, will be entitled to protection under this policy.

Anyone who knowingly makes false reports will be subject to disciplinary and/or other legal action, which may include dismissal or, when appropriate, a libel suit.

9. Storage of whistleblowing and case reports

If the violation reported is not substantiated by authorised personnel and the associated data are not required by the Company for any further proceedings, the report and all information collected relating to the report and its management will be permanently deleted within 6 months after the case is closed.

If the violation reported is substantiated, the report and all information collected in connection with the report and its management will be retained for as long as necessary for the establishment, exercise or defence of the respective legal claims.

In any case, all documentation concerning the cases reported may not be stored for more than 5 years.

10. Update and revision

All users may propose justified additions to this Regulation when deemed necessary. Such proposals will be examined by the Company management.

This Regulation is subject to periodic revision, also depending on the introduction of new working and/or IT tools, technological developments or regulatory changes.

The Management

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