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Servizi Industriali S.r.l.

PROCEDURE FOR THE MANAGEMENT OF WHISTLEBLOWING REPORTS

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1. PURPOSE OF THIS PROCEDURE

By means of this Procedure, **Servizi Industriali S.r.l.** (hereinafter referred to as "**Company**") intends to regulate, the methods for making and management of Whistleblowing Reports, including anonymous form, concerning alleged irregularities, offences and/or omissive conduct that damage the public interest or the integrity of the Company and which have become known by reason of the employment relationship, i.e. due to or on occasion of the same, as better specified below.

More in detail, the purpose of this procedure is, on the one hand, to describe and regulate the process of reporting alleged irregularities, offences and/or omissive conduct, providing the Whistleblower with clear operational indications on the subject, contents, recipients and means of transmission of Reports, as well as on the forms of protection provided by the Company in accordance with the regulatory provisions; on the other hand, to regulate the means of ascertaining the validity and grounds for Reports in order to take, where appropriate, the appropriate corrective and disciplinary actions.

2. REGULATORY SOURCES WITH REGARD TO WHISTLEBLOWING REPORTS

The main provisions on so-called Whistleblowing are contained in Legislative Decree no. 24 of 10 March 2023, of *"Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the Protection of Persons Reporting Breaches of Union Law and on the Provisions Concerning the Protection of Persons Reporting Breaches of National Law Provisions":*

In particular, Legislative Decree no. 24/2023 intervened by introducing specific provisions aimed at regulating the reporting of any unlawful conduct, commission or omission that harms the public interest or the integrity of the Company. Such violations may also consist in violations of the Code of Ethics of Interpump Group S.p.A..

The regulatory provisions allow for the reporting of violations of European Union law, violations of the Code of Ethics, and contribute to creating a system of reporting, an integral part of the overall *corporate governance* system, to protect the Whistleblower, the public interest protected, and the integrity of the legal person itself, in order to foster cooperation, communication and corporate social responsibility within the work environment.

The article 4, paragraph 1, of Legislative Decree no. 24/2023 provides that: *"Subjects in the private sector, having heard the representations or trade union organisations referred to in article 51 of Legislative Decree no. 81 of 2015, shall activate, pursuant to this Article, their own reporting channels, which guarantee, also through the use of encryption tools, the confidentiality of the identity of the reporting person, of the person involved and of the person in any case mentioned in the report, as well as the content of the report and the related documentation"*.

3. DEFINITIONS

For the purposes of this Procedure, the following terms shall have the following meanings:

a) **Company:** means **Servizi Industriali S.r.l.**;
b) **Reports or Whistleblowing Reports**: means the communication, in writing or orally, of information about violations;
c) **Internal Reports**: means the written or oral communication of information on violations, submitted through the Company's own internal reporting channel which guarantees, by means of encryption tools, the confidentiality of the identity of the Whistleblower, of the person involved and of the person in any case mentioned in the report, as well as the content of the report and of the relevant documentation;

d) **Violations**: means to conduct, acts or omissions that affect the public interest or the integrity of the Company and consist of violations of the Code of Ethics;
e) **Whistleblower:** means the person who can report information on violations acquired within employment context, namely:
   (i) employee of the Company, including occasional worker, intermittent, temporary, apprenticeship and ancillary employment relationship;
   (ii) self-employed workers and the holder of a collaboration relationship who work for the Company, including work contracts;
   (iii) worker or collaborator carrying out his or her work for the company providing goods or services or carrying out works for third parties;
   (iv) freelancers and consultants working for the Company;
   (v) volunteers and trainees, paid and unpaid, who work for the Company;
   (vi) shareholder and person with functions of administration, management, control, supervision, or representation, even where such functions are exercised on a de facto basis, of the Company.
   (vii) for the aforementioned persons even when the legal relationship has not yet commenced (if the information was acquired during the selection process or in other pre-contractual stages), during the probationary period or after the termination of the employment or other legal relationship if the information on violations was acquired during the same.
f) **Facilitator:** means the person who assists the Whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential**;**
g) **Person Involved**: means the person mentioned in the Report as the person to whom the violation is attributed or as a person otherwise implicated in the violation reported;
h) **Employment context**: means the work or professional activities, present or past, carried out within the framework of the legal relations between the Whistleblower and the Company, through which, irrespective of the nature of such activities, a person obtains information about violations and in the context of which he/she could risk suffering retaliation in the event of a Report;
i) **Persons in Charge of the Management of Whistleblowing Reports of Interpump Group S.p.A.**: means are the subjects, which are part of the Internal Audit, Risk & Compliance Function of Interpump Group, in charge of receiving the Reports and carrying out the activities of verification and management of the reported facts, as better specified within this Procedure.

4. WHISTLEBLOWING REPORTS

4.1 Object and content of Whistleblowing Reports

Whistleblowing Reports must relate to violations of which the Whistleblower has become aware within employment context.

In particular, Violations of the Code of Ethics, as well as of the Company's own procedural framework, are considered relevant for reporting purposes.

Disputes, claims or requests related to a personal interest of the Whistleblower that relate exclusively to his/her individual employment relationships, or inherent to his/her employment relationships with hierarchically superior (for example: reports concerning labour disputes and pre-litigation phases, discrimination between colleagues, interpersonal conflicts between the Whistleblower and another worker or with hierarchical superiors, reports concerning data processing carried out in the context of the individual employment relationship in the absence of injury to the public interest or to the integrity of the Company) cannot be the subject of Reports.

The Whistleblower must provide all useful elements so that the Manager of the Report can carry out the necessary and appropriate checks and verifications on the facts brought to his attention, to ascertain that the Report is well-founded. The Reports, therefore, must:

- be sufficiently clear and circumstantial;
- be based on precise and concordant elements;
- relate to facts that are verifiable and known directly to the Whistleblower;
- enable adequate verification of the merits of the Report, by providing, by way of example but not limited to, the following information together with any supporting documentation:
  - clear and complete description of the conduct, including omission, that is the subject of the Report;
  - circumstances of time and place in which the acts were committed and the related conduct;
  - generalities or other elements that make it possible to identify the persons involved, company structures or organisational units involved;
  - any third parties involved or potentially damaged;
  - any documentation confirming the validity of the reported facts;
  - any other information or evidence that may constitute useful evidence as to the existence of the reported facts.

Reports may not relate to mere suspicions or rumors, or to grievances, demands, claims or requests of a personal character of the Whistleblower.

The Report must be made in good faith and must not contain libelous and/or defamatory information. Slanderous and/or defamatory Reports may give rise to civil and/or criminal liability for the Whistleblower and to the application of disciplinary sanctions.

In order to encourage the emergence of Reports of unlawful conduct, the possibility of also taking into consideration anonymous reports, i.e. those lacking elements enabling their author to be identified, is envisaged. **Servizi Industriali S.r.l.** takes an anonymous report into consideration when it is adequately circumstantiated and made with a wealth of details and in any case such as to bring to light facts and situations relating them to specific contexts (for example: indications of particular names or qualifications, mention of specific offices, proceedings or particular events, etc.). It is understood that the protection measures provided for by the legislation will also apply to anonymous reports.

4.2 Submission of Whistleblowing Reports

Servizi Industriali S.r.l., in concert with Interpump Group S.p.A., has set up internal reporting channels capable of guaranteeing the confidentiality of the identity of the Whistleblower and the correct management of the relative Reports (even if anonymous).

Reports must be made by filling in a specific form or by recording a voice message, using the Whistleblowing Report Management Portal[1], accessible through the following link: https://interpumpgroup.integrityline.com/. The Company makes available, in a specific section of its website, instructions for sending a Reports through the Whistleblowing Reporting Management Portal.

Alternatively, a Report can be made through the following channels:

- using the ordinary mailbox: Interpump Group S.p.A., to the attention of Persons in Charge of the Management of Whistleblowing Reports, via E. Fermi, 25 - 42049 S. Ilario d'Enza (RE) – Italy; in order to

[1] Preferential reporting channel.

ensure confidentiality, the report must be placed in two sealed envelopes, the first one with the identification data of the Whistleblower and the second one with the Report, and both must be placed in a third sealed envelope bearing on the outside the words "confidential" to the Persons in Charge of the Management of Whistleblowing Reports of Interpump Group S.p.A;
- by calling the following phone number +39 0522 904 311 (Mon-Fri | 9-17).

Through the above modalities it is also possible to request the fixing of a meeting with the Persons in Charge of the Management of Whistleblowing Reports. In the event that the Report involves one of the Persons in Charge of the Management of Whistleblowing Reports, it will be possible to exclude a recipient of the Report within the aforementioned Portal.

In any case, the Whistleblower must expressly indicate in the subject line of the Report that it is a Report for which he/she intends to keep his/her identity confidential and therefore benefit from the protections provided for in the event of any retaliation suffered on account of the Report. In the absence of such a clear indication, or where such an intention on the Whistleblower is not clearly discernible, the report will be treated as ordinary and will not benefit from the aforementioned protections.

If the Report is presented to a person other than the Persons in Charge of the Management of Whistleblowing Reports, the receiving entity shall send, within seven days of its receipt, the Report to the Persons in Charge of the Management of Whistleblowing Reports who will give notice of the transmission to the Whistleblower.

If the Report is made orally, through a phone call or a meeting with the Persons in Charge of the Management of Whistleblowing Report, with the consent of the Whistleblower, the Report is documented in a transcribed minute. The Whistleblower may verify, rectify and confirm the transcribed minutes by signing them. The documentation will not be recorded and will be kept in the external archives, not accessible to unauthorised personnel. The Report made orally by telephone call or meeting and the related minutes will be recorded in the Whistleblowing Report Management Portal in order to keep track of the Reports received and to ensure compliance with the retention periods laid down in the legislation.

4.3 Duties and responsibilities

The Head of Internal Audit, Risk & Compliance Function is responsible for the application, updating and amendment of this Procedure and, in the performance of verification activities, possesses an appropriate level of authority, independence and autonomy.

The Persons in Charge of the Management of Whistleblowing Reports are in charge of receiving and managing the Reports covered by this Procedure. They also have access to all the information and facts relating to the Reports received.

The Persons in Charge of the Management of Whistleblowing Reports are responsible for verifying the validity and management of the Report and shall, in compliance with the principles of impartiality, fairness, transparency and confidentiality, carry out any activity deemed appropriate, including the personal hearing of the Whistleblower and of any other person who may report on the facts that are the subject of the Report.

The Persons in Charge of the Management of Whistleblowing Reports, within seven days from the date of receipt of the report and where it is possible to trace the sender, will issue an acknowledgement of receipt to the Whistleblower through the same channels as for the receipt of the Report.

The Persons in Charge of the Management of Whistleblowing Reports may contact, if known, the Whistleblower if they consider that the Report is too general or is accompanied by inappropriate or irrelevant documentation, in order to request further information useful for carrying out the verification activity. If no further elements are provided, or elements deemed insufficient, the Report will be archived.

In the course of the verifications, the Persons in Charge of the Management of Whistleblowing Reports may avail themselves of the support of the corporate functions or structures competent from time to time and, where deemed appropriate, of external consultants specialised in the field of the Report and whose involvement is functional to the investigation of the Report. Only the content of the report will be forwarded to such persons, with the exclusion of all references from which it is possible to trace back, even indirectly, the identity of the Whistleblower. Where it is necessary to carry out investigations, the identity of the Whistleblower may be disclosed to third parties involved in the investigations only with the express consent provided by the same Whistleblower. In this case, the subjects involved bear the same duties of conduct aimed at ensuring the confidentiality of the Whistleblower.

Moreover, the persons involved will be responsible for carrying out all necessary verifications and sending a report on the investigation activities carried out and the outcome of the investigations to the Persons in Charge of the Management of Whistleblowing Reports.

On the basis of the information provided, the Persons in Charge of the Management of Whistleblowing Reports evaluate:

- whether to proceed with the filing of the Report on the ground that it is manifestly unfounded due to the absence of factual elements capable of justifying investigation, or due the ascertained generic content of the Report that does not allow the facts to be understood, or because the Report is accompanied by inappropriate or irrelevant documentation;
- whether to initiate an audit or fraud investigation;
- whether it is necessary to involve the Judicial Authority;
- whether it is necessary to involve administrative bodies or independent authorities vested with supervisory and control functions (e.g. Consob).

At the end of the verification phase, the Persons in Charge of the Management of Whistleblowing Reports prepare a report summarising the investigations carried out and the evidence that emerged, and share it, based on the results, with the company functions from time to time competent.

In any case, in the event of a *fumus* of validity of the Report, the Persons in Charge of the Management of Whistleblowing Reports must contact the internal bodies and/or the external bodies/institutions possibly competent, in order for them to take any appropriate action.

It is not incumbent on the Persons in Charge of the Management of Whistleblowing Reports to ascertain individual responsibilities, whatever their nature, nor to carry out legitimacy or merit checks on acts and measures adopted by the reported Company, on pain of encroaching on the competences of the persons in charge within the Company or of the judiciary or other public authorities.

It is the responsibility of the Persons in Charge of the Management of Whistleblowing Reports to guarantee:

- the traceability of the Reports and of the relevant investigation activities;
- the storage of the documentation relating to the Reports and the relevant verification activities, in special archives, ensuring the appropriate levels of security/confidentiality;
- the retention of the Reports and the documents relating to them for a period of time no exceeding that necessary for the purposes for which the data were collected or subsequently processed, and in any case in compliance with the Procedure and the procedures for the protection of personal data in force in the

Company, and in any case no longer than five years from the date of communication of the final outcome of the Reporting Procedure.

The functions involved in the activities of verifying the validity of the Report ensure, each to the extent of its competence, the traceability of the data and information and provide for the preservation and archiving of the documentation produced, on paper and/or electronically, so as to allow the reconstruction of the different stages of the process itself.

Without prejudice to the obligations of timely reporting upon the occurrence of certain events, the Persons in Charge of the Management of Whistleblowing Reports shall ensure an annual summary flow on the reports received and managed, in compliance with the confidentiality:

- to the Board of Directors
- to the Board of Statutory Auditors;
- to the Risk and Control Committee;
- to the Company in charge of auditing the accounts.

4.4 Confidentiality

Servizi Industriali S.r.l. ensures that all Reports with the characteristics described in section 4.1 are taken into consideration in the manner described above, even if, as mentioned, they are made anonymously.

The documentation relating to each Report received (i.e. all the information and supporting documents from which the identity of the Whistleblower or of other persons mentioned in the Report can be deduced) is kept, in compliance with confidentiality requirements, for as long as is necessary for the performance of the management activities of the Reports received and, in any case, for no longer than five years from the date of the communication of the final outcome of the Reporting procedure. Therefore, without prejudice to the rights recognisable in the head of the Whistleblower pursuant to Regulation (EU) 2016/679, the Report cannot be viewed or extracted as a copy by any requesting party.

The identity of the Whistleblower and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the Whistleblower's express consent, to persons other than those competent to receive or follow up the Reports expressly authorised to process such data pursuant to articles 29 and 32, paragraph 4, of Regulation (EU) 2016/679 and article *2*-quaterdecies of the Personal Data Protection Code under Legislative Decree no. 196/2013, and in accordance with the company's data protection procedures[2].

The identity of the Whistleblower and any other information from which that identity may be inferred, directly or indirectly, may only be disclosed under the following conditions:

1. if it is necessary for the purpose of investigating the Report, and in any case with the express consent of the Whistleblower;
2. in disciplinary proceedings if the charge is based in whole or in part on the Report and knowledge of the identity of the Whistleblower is indispensable for the accused's defence, and in any case only with the express consent of the Whistleblower;
3. where in internal and external reporting procedures the disclosure of the identity of the Whistleblower is indispensable also for the defence of the person concerned, and in any case only with the express consent of the Whistleblower.

[2] For the privacy policy rendered for the purposes of this Procedure, please refer to Annex 1.

In the above cases, the Persons in Charge of the Management of Whistleblowing Reports shall notify the Whistleblower, in writing, of the clear and precise reasons for the need to disclose his/her identity. The Whistleblower must give his/her express consent.

The Company also ensures the confidentiality of the information relating to (i) the identity of the person involved; (ii) the Facilitator (both with reference to the identity and to the activity in which the assistance takes place); (iii) persons other than the Reported, but nevertheless implicated as mentioned in the report (e.g. witnesses), until the conclusion of the proceedings initiated on account of the report and in compliance with the same guarantees provided for in favour of the Whistleblower. The Reported does not have the right to be always informed of the report concerning him/her; this right, in fact, is guaranteed within the framework of the proceedings that may be initiated against him/her following the conclusion of the verification and analysis of the Report, and in the event that such proceedings are based in whole or in part on the Report.

The same duties of conduct, aimed at maintaining the confidentiality of the Whistleblower, to which the Persons in Charge of the Management of Whistleblowing Reports are bound, shall be incumbent on the head of the corporate function in charge of disciplinary proceedings.

The violation of the duty of confidentiality is a source of disciplinary liability, without prejudice to any further liability provided for by law.

4.5 Prohibition of retaliation and/or discrimination

Servizi Industriali S.r.l. shall not permit or tolerate any act of retaliation or discrimination, direct or indirect, affecting working conditions for reasons directly or indirectly connected to the Whistleblowing. Retaliatory and/or discriminatory measures means any behaviour, act or omission, even if only attempted or threatened, carried out because of the Report and that causes or may cause, directly or indirectly, an unjust damage[3].

Retaliatory or discriminatory acts against the Whistleblower are a source of disciplinary liability, without prejudice to any further liability provided for by law.

The protections against acts of retaliation or discrimination apply not only during the legal relationship between the Whistleblower and the Group, but also during the selection process or other pre-contractual stages, during the probationary period or after the termination of the relationship, if information on violations has been acquired during these periods.
In addition, the protection system is extended to the following subjects:

- facilitators;
- persons in the same work environment as the Whistleblower and who are linked to him by a stable emotional or family relationship up to the 4th degree;

[3] For example, may be considered retaliatory acts: *"(a) dismissal, suspension or equivalent measures; (b) downgrading or non-promotion; (c) change of duties, change of place of work, reduction of salary, change of working hours; (d) suspension of training or any restriction on access to it; (e) negative merit notes or negative references; f) the adoption of disciplinary measures or any other sanction, 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 an employment contract of indefinite duration, where the employee had a legitimate expectation of such conversion; (l) the non-renewal or early termination of a fixed-term employment contract; (m) damage, including to a person's reputation, in particular on social media, or economic or financial loss, including loss of economic opportunities and loss of income (n) inclusion on improper lists on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future; (o) early termination or cancellation of a contract for the supply of goods or services; (p) cancellation of a licence or permit; (q) a request to undergo psychiatric or medical examinations".*

- to the Whistleblower's work colleagues, who work in the same work environment as the Reporting Officer and have a regular and current relationship with him/her;
- entities owned by the Whistleblower or for which he/she works, as well as entities operating in the same work environment as the Whistleblower.

It is also prohibited any form of retaliation or discrimination having effects on the working conditions of those who collaborate in the activities of verification of the validity of the Report.

In order to enjoy protection against retaliatory acts, it is necessary that:

- the Whistleblower reasonably believes, also in the light of the circumstances of the concrete case and the data available at the time of the Reporting, that the information on the reported violations is true. On the other hand, mere suppositions or rumours as well as news in the public domain are not sufficient;
- the Whistleblower reasonably believes that the information contained in the Report is relevant as falling within the Violations;
- Report must be carried out in accordance with the following Procedure;
- there is a close link between the Report and the retaliatory act suffered.

In the event of ascertainment by a judgement, even if not final, of first instance against the Whistleblower of criminal liability for the offences of slander or defamation or in any case for the same offences in connection with the complaint, or of civil liability, for having intentionally or negligently reported false information, the Whistleblower shall be subject to a disciplinary sanction.

5. RECIPIENTS OF THIS POLICY

This Procedure shall be disseminated as widely as possible.

To this end, it is made available on the company intranet, posted on notice boards and sent to all employees of **Servizi Industriali S.r.l.** that have an e-mail address.

The methods for reporting and contacting the Persons in Charge of the Management of Whistleblowing Reports are also made available on the company website.

The Persons in Charge of the Management of Whistleblowing Reports shall identify the most appropriate initiatives to ensure the maximum dissemination of this Procedure and the correct implementation of its contents.

6. ENTRY INTO FORCE

This procedure enters into force as of November 30, 2023.