EUROSIREL S.p.A.

Whistleblowing Procedure

Eurosirel S.p.A.

Approved by the Board of Directors on 1 July 2026

Unofficial English translation of the Italian original.
In the event of any discrepancy, the Italian original text shall prevail.

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Whistleblowing Procedure

Revision history

Rev.	Date	Description of changes
0	01/07/2026	First issue

1. Foreword

Eurosirel S.p.A. (hereinafter also the "Company") recognises whistleblowing as a fundamental measure for protecting people who report violations of national or European Union provisions that harm the public interest or the integrity of the Company, of which they have become aware in a work-related context.

For these reasons, the Company deems it appropriate to adopt a Whistleblowing Procedure (hereinafter also the "Procedure") in compliance with Legislative Decree No. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, and containing provisions on the protection of persons who report breaches of national regulatory provisions (hereinafter also the "Whistleblowing Decree" and/or the "Decree").

This Procedure constitutes an Annex to the Organisation, Management and Control Model adopted by the Company pursuant to Legislative Decree 231/2001 on the "Administrative liability of legal persons, companies and associations, including those without legal personality" (hereinafter also "Legislative Decree 231/2001" or the "Decree"), in compliance with paragraph 2-bis of Article 6 of Legislative Decree 231/2001.

2. Purpose of the Procedure

The Procedure aims to provide operational guidance on the following aspects:

- the persons authorised to make a Report;
- the subject matter and content of the Report;
- the identification and management of the internal reporting channel;
- the identification of the person responsible for managing the internal reporting channel;
- the methods for submitting a Report;
- external reporting channels;
- the forms of protection guaranteed to reporting persons;
- the methods and terms for retaining documentation relating to Reports;
- the adoption and dissemination of the contents of this Procedure.

3. Definitions

Violation: conduct, acts or omissions that harm the public interest or the integrity of the Company, which are the subject of a report, as further defined in paragraph 5 below.

Reporting person/Whistleblower: the person, falling within the categories indicated in paragraph 4 below, who reports violations.

Reported person: the person who commits/omits, or is involved in, the violation being reported.

Internal report: the communication, in writing or verbal, submitted by the reporting person through the internal reporting channel, containing data and information about the violations.

External report: the communication, in writing or verbal, submitted by the reporting person through the external reporting channel, containing data and information about the violations.

ANAC: the National Anti-Corruption Authority, referred to in Article 1, paragraph 1, of Law No. 190 of 6 November 2012, containing "Provisions for the prevention and suppression of corruption and illegality in public administration".

4. Persons who may report

Pursuant to Article 3 of the Whistleblowing Decree, the Procedure applies to Reports made by the following persons, namely:

- employees, self-employed workers, collaborators, freelance professionals and consultants;
- volunteers and interns, whether paid or unpaid;
- shareholders and those who hold, within the Company, administrative, management, control, supervisory or representative functions, even if exercised on a purely de facto basis.

The protective measures set out in Chapter III of the Whistleblowing Decree also apply to:

- facilitators (i.e., those who assist the reporting person in the reporting process, operating within the same work context, whose assistance must remain confidential);
- persons belonging to the same work context as the reporting person, who are linked to them by a stable emotional relationship or by kinship;
- work colleagues of the reporting person, linked to them by a habitual and ongoing relationship;
- entities owned by the reporting person or for which the protected persons work, as well as entities operating in the same work context as the persons referred to above.

5. Subject matter of the Report

Pursuant to Article 2, paragraph 1, letter a) of the Whistleblowing Decree, the violations that may be reported concern conduct, acts or omissions that harm the public interest or the integrity of the Company, and consist of:

a) administrative, accounting, civil or criminal offences not falling under letter c);

b) unlawful conduct relevant under Legislative Decree 231/2001 and/or violations of the requirements of the Organisational Model adopted by the Company;

c) breaches falling within the scope of application of EU law, with particular reference to:

- breaches falling within the scope of application of European Union acts relating to specific sectors, including: public procurement; financial services, products and markets, and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; public health; consumer protection; protection of privacy and personal data protection, and security of network and information systems;
- acts or omissions that harm the Union's financial interests;
- acts or omissions concerning the internal market;
- acts or conduct that defeat the object or purpose of the provisions of Union acts.

d) violations of European Union restrictive measures referred to in Chapter I-bis, Title I, Book II of the Criminal Code, as well as of Article 12, paragraph 1-bis, of Legislative Decree No. 286 of 25 July 1998.

The Report may also concern:

- information relating to conduct aimed at concealing the violations indicated above;
- unlawful activities not yet carried out but which the whistleblower reasonably believes may occur, based on precise and consistent concrete elements;
- well-founded suspicions.

The Report must, in any case, be as detailed as possible and contain the greatest possible number of elements in order to enable the recipient to carry out the necessary checks.

With regard to the subject matter of Reports, they must contain a clear and complete description of the facts being reported, indicating (if known) the circumstances of time and place in which the facts were committed/omitted, as well as (if known) the identity of the reported person and/or elements suitable for identifying them.

In addition, the reporting person may indicate the following further elements:

- their personal details, indicating the position or role held within the Company;
- an indication of any other persons who may be able to provide information on the facts reported;
- an indication of any documents that may confirm or support the veracity of the facts reported;
- any other information that may provide useful evidence as to the existence of the facts reported.

The following are excluded from, and therefore do not fall within, the scope of application of this Procedure:

- disputes, claims or requests linked to a personal interest of the reporting person that relate exclusively to their individual employment relationships with the Company, or to their working relationships with hierarchically superior figures;
- reports of violations already mandatorily governed by European Union or national acts referred to in Part II of the Annex to the Decree, or by national acts implementing the European Union acts referred to in Part II of the Annex to Directive (EU) 2019/1937;
- reports of violations relating to national security, as well as procurement relating to defence or national security aspects, unless such aspects fall within relevant EU derived law.

6. Reporting channel and identification of the responsible person

6.1 Internal reporting channel, responsible person and methods of submitting the report

The Company, in compliance with Articles 4 and 5 of the Whistleblowing Decree, having consulted the workers' representatives or trade union organisations referred to in Article 51 of Legislative Decree 81/2015, has activated its own internal reporting channels that guarantee the protection and confidentiality of the identity of the reporting person, the person involved and the person mentioned in the Report, as well as the content of the Report and the related documentation.

Specifically, the Report may be made using the internal channel identified and available by accessing the link:

- https://wb-hs.mc3-innovation.it/ARXivarNextWebPortal

available on the Company's institutional website.

On first access, the reporting person is required to log in to the portal using the following credentials (the password for which will subsequently be changed):

- ID: segnalatore_eurosirel
- PASSWORD: segnalatore_eurosirel

The Report may be submitted by the whistleblower:

- in writing, by electronic means;
- verbally, by requesting – through the internal reporting channels – a direct meeting, which must be arranged within a reasonable time.

The Report may be submitted, in the manner set out above, in the following cases:

- during the course of the employment/collaboration/consultancy/internship relationship, or during the probationary period;
- prior to the start of the employment/collaboration/consultancy/internship relationship, if information on the violations was acquired during the selection process or in other pre-contractual stages;
- after the termination of the employment/collaboration/consultancy/internship relationship, if information on the violations was acquired before the relationship ended.

Management of the "internal reporting channel" is entrusted to the Supervisory Body, whose member is autonomous and specifically trained. The Body may appoint any supporting persons, internal and/or external to the Company, to assist in handling the investigation resulting from receipt of the Report.

An internal Report submitted to a person other than the one identified is forwarded, within seven days of its receipt, to the competent person, with simultaneous notice of the transmission given to the reporting person.

6.2 Management of the internal reporting channel

The Supervisory Body – having received the report through the internal reporting channel – pursuant to and for the purposes of Article 5 of the Decree, shall:

- issue the reporting person with an acknowledgement of receipt of the Report within seven days of the date of receipt;
- maintain communications with the reporting person and request from them, if necessary, additional information regarding the subject matter of the Report;
- give diligent follow-up to Reports received;
- provide feedback to the reporting person within three months of the date of the acknowledgement of receipt of the Report or, in the absence of such acknowledgement, within three months of the expiry of the seven-day period from submission of the Report;
- make available clear information regarding the reporting channels activated by the Company, the procedures adopted, and the requirements for submitting an internal report, as well as on the channel, procedures and requirements for making an external report.

6.3 External reporting channel – reporting to ANAC

Pursuant to Articles 6 and 7 of the Whistleblowing Decree, the reporting person may proceed with the Report through the "external reporting channel" activated by ANAC, where, at the time the Report is submitted, one of the following conditions applies:

a) the mandatory activation of an internal reporting channel is not required in the reporting person's work context, or such a channel, even if mandatory, is not active or, even if activated, does not comply with the requirements of Article 4 of the Decree;

b) the reporting person has already made an internal Report and it has not been followed up;

c) the reporting person has reasonable grounds to believe that, if they were to make an internal Report, it would not be effectively followed up, or that the Report itself could give rise to a risk of retaliation;

d) the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

The external reporting channel is activated and managed by the National Anti-Corruption Authority (ANAC) and governed by "Guidelines No. 1 - 2025 on whistleblowing via internal reporting channels" – approved, most recently, by Resolution No. 478 of 26 November 2025, to which reference is made.

6.4 Other external reporting channels – public disclosure

Pursuant to Article 15 of the Whistleblowing Decree, the reporting person has the option of resorting to public disclosure as a further external reporting channel.

As provided for by Article 2 of the Whistleblowing Decree, "public disclosure" or "disclosing publicly" means: "making information on violations publicly available through the press or electronic means, or in any case through means of dissemination capable of reaching a large number of people."

A reporting person who makes a public disclosure benefits from the protections provided for by this Procedure if, at the time of the public disclosure, one of the following conditions applies:

- the reporting person has previously made an internal and external Report, or has made an external Report directly, and no feedback was given within the established time limits regarding the measures envisaged or adopted to follow up on the reports;
- the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- the reporting person has reasonable grounds to believe that the external Report may involve a risk of retaliation, or may not be effectively followed up due to the specific circumstances of the case, such as those in which evidence may be concealed or destroyed, or in which there is a well-founded fear that the person who received the Report may be colluding with the perpetrator of the violation or involved in the violation itself.

7. Protection of the reporting person

The following types of protection are recognised for the reporting person:

- protection of the confidentiality of their identity;
- protection from any retaliatory or discriminatory measures.

7.1 Protection of the confidentiality of the reporting person's identity

The Company, in compliance with Article 12 of the Whistleblowing Decree, uses Reports for the time strictly necessary to give them adequate follow-up.

The Company guarantees the protection of the identity of the reporting person and of any other information from which such identity may be directly or indirectly inferred, in compliance with Regulation (EU) 2016/679 and Legislative Decree 196/2003 "Personal Data Protection Code", as amended by Legislative Decree 51/2018 (see paragraph 8 of this Procedure, "Processing of personal data").

The Company ensures the protection of the reporting person's identity also in the context of criminal, accounting and disciplinary proceedings. In particular, in disciplinary proceedings, the reporting person's identity may not be disclosed where the disciplinary charge is based on findings that are separate from and additional to the Report, even if made as a result of it. Where the charge is based, in whole or in part, on the Report, and knowledge of the reporting person's identity is essential for the defence of the accused, the Report may be used for disciplinary proceedings only with the express consent of the reporting person to the disclosure of their identity.

The Company shall in any case notify the reporting person of the reasons for the disclosure of confidential data.

The Company also guarantees the identity of the persons involved and the persons mentioned in the Report until the conclusion of proceedings initiated as a result of the Report, in compliance with the same guarantees provided for the reporting person.

The person involved in the Report may be, or on request shall be, heard, including through a written procedure involving the acquisition of written observations and documents.

7.2 Protection of the reporting person from discriminatory or retaliatory measures

The Company, pursuant to Article 17 of the Whistleblowing Decree, prohibits any form of retaliation, even merely attempted or threatened, against the reporting person.

As provided for by Article 2, paragraph 1, letter m), of the Whistleblowing Decree, the term "retaliation" means "any conduct, act or omission, even merely attempted or threatened, carried out on account of the report, the complaint to the judicial or accounting authority, or the public disclosure, and which causes or may cause the reporting person, or the person who filed the complaint, unjust harm, directly or indirectly."

The following are examples of situations that, where they fall within the above definition, constitute retaliation:

a. dismissal, suspension or equivalent measures; b. demotion or failure to promote; c. change of duties, change of place of work, reduction of salary, change of working hours; d. suspension of training or any restriction of access to it; e. negative performance appraisals or references; f. imposition of disciplinary measures or other sanctions, including financial ones; g. coercion, intimidation, harassment or ostracism; h. discrimination or otherwise unfavourable treatment; i. failure to convert a fixed-term employment contract into a permanent one, where the worker had a legitimate expectation of such conversion; j. failure to renew, or early termination of, a fixed-term employment contract; k. damage, including reputational damage, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income; l. inclusion on improper lists on the basis of a formal or informal sector or industry agreement, which may prevent the person from finding employment in the sector or industry in future; m. early termination or cancellation of a contract for the supply of goods or services; n. cancellation of a licence or permit; o. a request to undergo psychiatric or medical examinations.

Pursuant to Article 19 of the Whistleblowing Decree, the reporting person may report to ANAC any retaliation they believe they have suffered.

In order to acquire the evidence necessary to establish retaliation, ANAC may avail itself, within its respective competence, of the cooperation of the National Labour Inspectorate.

The Judicial Authority to which the matter is referred shall adopt all measures, including provisional ones, necessary to ensure protection of the legal position asserted, including compensation for damage, reinstatement in the workplace, and a declaration of nullity of retaliatory acts.

8. Sanctions

Pursuant to Article 21 of the Whistleblowing Decree, ANAC shall apply the following administrative financial penalties:

- from EUR 10,000 to EUR 50,000, where it is found that retaliation has been carried out, that the Report has been obstructed or an attempt has been made to obstruct it, or that the obligation of confidentiality has been violated;
- from EUR 10,000 to EUR 50,000, where it is found that reporting channels have not been established, that procedures for making and managing reports have not been adopted, or that such procedures do not comply with those set out in Articles 4 and 5, as well as where it is found that verification and analysis of reports received has not been carried out;
- from EUR 500 to EUR 2,500 – against the reporting person – in the event of their conviction, even at first instance, for the offences of defamation or false accusation, or in any case for the same offences committed by reporting to the judicial or accounting authority.

The Company has also provided, in the Organisation, Management and Control Model adopted pursuant to Legislative Decree 231/2001, further specific sanctioning measures against persons who violate the current whistleblowing system.

9. Processing of personal data

The Company, as data controller, pursuant to Article 4 of EU Regulation 679/2016, ensures that the processing of personal data resulting from the management of Reports takes place in compliance with the principles on personal data protection, including the principle of lawfulness, fairness and transparency, according to which personal data must be "processed lawfully, fairly and in a transparent manner in relation to the data subject" and must be "adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed" (Article 5, paragraph 1, letters a) and c) of EU Regulation 679/2016).

In particular, the Company undertakes to provide the reporting person and the persons involved in the Report with a privacy notice pursuant to Articles 13 and 14 of EU Regulation 679/2016, and ensures that data is "processed in a manner that ensures appropriate security" of the data, "including protection, by means of appropriate technical and organisational measures, against unauthorised or unlawful processing and against accidental loss, destruction or damage" (Article 5, paragraph 1, letter f) and Article 32 of EU Regulation 679/2016), also carrying out a data protection impact assessment (DPIA), taking into account the particular "vulnerability" of the data subjects involved and the specific risks to their rights and freedoms in the work context.

The Company also governs its relationship with external parties who process personal data on its behalf, who are appointed "Data Processors", and identifies the internal person responsible for managing Reports as the "Person Authorised to Process Personal Data", pursuant to Articles 28 and 29 of EU Regulation 679/2016 respectively.

Finally, the Company guarantees the exercise of the rights set out in Articles 15 to 22 of EU Regulation 679/2016, within the limits provided for by the relevant legislation.

10. Retention of documentation relating to reports

Reports and related documentation are retained for the time necessary to process the Report and, in any case, for no longer than five years from the date on which the final outcome of the reporting procedure is communicated.

Where, at the request of the reporting person, the Report is made verbally during a meeting with the Supervisory Body, it is, with the reporting person's consent, documented by the Body by means of a recording on a device suitable for storage and playback, or by means of minutes. Where minutes are drawn up, the reporting person may check, correct and confirm the minutes of the meeting by signing them.

11. Adoption and dissemination of the Procedure

This Procedure is adopted by the Board of Directors, as is every subsequent revision and/or amendment.

This Procedure is communicated to all Company personnel by being displayed and made visible in the workplace and/or published in the dedicated section of the Company intranet and website, also for the benefit of interested third parties.