

### Whistleblowing Policy

CAP ARREGHINI S.p.A (hereinafter also referred to as the “Company”) has implemented a “Whistleblowing” system (hereinafter also referred to as “Reports”) as provided for by Legislative Decree 24/2023, through which Italy has “implemented Directive (EU) 1937/2019 on the protection of persons reporting breaches of Union law and laying down provisions on the protection of persons reporting breaches of national legal provisions”.

Legislative Decree 24/2023, in line with the European Directive, aims to strengthen the legal protection of persons who report breaches of national or European regulatory provisions which harm the interests and/or integrity of the private (or public) organisation to which they belong, and of which they have become aware in the course of their work.

Therefore, should a person<sup>1</sup> become aware of administrative, accounting, civil or criminal offences, they may promptly report the matter in detail to the company’s (external) Contact Person.

Reports to the Contact Person may be made, including anonymously, provided they are detailed,

#### ➤ **METHOD OF REPORTING – WRITTEN FORM**

- a paper report placed in three sealed envelopes: the first containing the reporter’s personal details together with a photocopy of their identity document; the second containing the report itself, so as to separate the of the reporter from the report itself. Both must then be placed in a third sealed envelope bearing the words ‘confidential’ on the outside, addressed to the person handling the report (e.g. ‘confidential to the Chair of the Supervisory Board’). The report must be sent to Ms Chiara Maltese, Via Brusafiera 12, 33170 Pordenone. Upon receipt of the report, it will be registered confidentially by the report handler, including via a separate register.

#### ➤ **METHODS OF REPORTING – ORAL REPORTS**

- by requesting a face-to-face meeting, at the Whistleblower’s request, with the Contact Person, to be sent to the email address [maltese@brusafiera12.it](mailto:maltese@brusafiera12.it)
- or by telephone on 0434 247417.

Please note that the whistleblower must not use this mechanism for purely personal purposes, for making claims or seeking retaliation, which, if anything, fall within the broader framework of the employment/collaboration relationship or relations with a line manager or colleagues, for which reference should be made to the relevant procedures of the company’s departments.

Reports relating to the whistleblower’s personal interests, which pertain exclusively to their individual employment relationships or to their working relationships with their line managers, are therefore excluded.

For further information, please refer to the Whistleblowing Policy on our website and on the company portal.

Thank you and best regards

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<sup>1</sup> employees; self-employed workers, contractors, freelancers and consultants; volunteers and trainees, whether paid or unpaid;

shareholders and persons holding administrative, managerial, supervisory, oversight or representative roles (including de facto roles); facilitators (persons who assist the whistleblower in the reporting process); persons belonging to the same work environment as the whistleblower and linked to them by a stable emotional or family relationship; the whistleblower’s work colleagues with whom they have a regular and ongoing relationship.