

WHISTLEBLOWING		
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Organisation, management and control model of Corcym S.r.l.

WHISTLEBLOWING

October 2024



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1. Purpose

This document provides guidelines on the channels, procedures and prerequisites for making internal reports of violations, wrongdoing and misconduct within the Group.

The channels and procedures described in this document also implement the obligations set forth in Articles 5(1)(e) of Italian Legislative Decree No. 24/2023 and 6(2-bis) of Italian Legislative Decree No. 231/2001, to which Corcym S.r.l. is subject.

2. Definitions and acronyms

The terms, expressions and acronyms used in this procedure shall have the meanings set out below.

Administrative Body	the administrative body of each Company
ANAC	Italian National Anti-Corruption Authority
Candidates	the individuals who participate in a selection process for an employee position with one or more Companies
CEO	the person within each Company who serves as chief executive officer or sole director, as the case may be
Code of Ethics	the code of ethics adopted by the Group
Collaborators	the individuals who have a collaboration relationship with one or more Companies
Company/ies	jointly, the Group companies and, individually, each of them
Consultants	the individuals who have contractual relationships with one or more Companies concerning the provision of services of a consulting nature
Corcym S.r.l. Report Manager	the Supervisory Body, entrusted with the management of the internal reporting channel with regard to Internal Reports related to Corcym S.r.l.
Employees	the individuals who have an employment relationship with a Company
Ethics & Integrity Team	a team of qualified professionals from the Companies who will handle the Internal Reports for Companies other than Corcym S.r.l.
External Report	the Report submitted through the external reporting channel activated by ANAC
Facilitator	the natural person who assists a Reporting Person in the reporting process, operating within the same working environment and whose assistance must be kept confidential
GC	the Group General Counsel
GDPR	the Regulation (EU) 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC
Group	the group of companies to which the Companies belong



Group Report Manager	the Ethics & Integrity Team, entrusted with the management of the internal reporting channel with regard to Internal Report related to Companies other than Corcym S.r.l.
Guidelines	the guidelines adopted by ANAC pursuant to Article 10 of Italian Legislative Decree No. 24/2023
HR	the local HR function
Independent professionals	the individuals, other than Consultants, who have contractual relationships with one or more Companies having as their object the provision of services of an intellectual nature
Internal Report	the Report submitted through the internal reporting channel
Involved Person	the natural or legal person mentioned in the Internal or External Report or in a Public Disclosure as the person to whom the violation is attributed or as a person otherwise implicated in the reported or publicly disclosed violation
Legislative Decree No. 196/2003	Italian Legislative Decree No. 196 of June 30th, 2003, containing the "Personal Data Protection Code"
Legislative Decree No. 231/2001	Italian Legislative Decree No. 231 of June 8th, 2001, bearing "Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality"
Legislative Decree No. 24/2023	Italian Legislative Decree No. 24 of March 10th, 2023, on "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23rd, 2019, on the protection of persons who report violations of European Union law and on provisions regarding the protection of persons who report violations of national laws"
Model	the organizational, management and control model adopted by Corcym S.r.l. pursuant to Italian Legislative Decree No. 231/2001
Public Disclosure	the act of placing information about violations in the public domain through print or electronic media or otherwise through means of dissemination capable of reaching a large number of people
Report Manager	jointly, Corcym S.r.l. Report Manager and the Group Report Manager and, individually, each of them
Self-employed	the individuals who have a self-employed relationship with one or more Companies
Speak-Up	the solution used by the Companies for receiving Internal Reports
Supervisory Body or SB	the supervisory body established by the Corcym S.r.l. pursuant to Italian Legislative Decree No. 231/2001
Suppliers	the entities, both public and private, that have contractual relationships with one or more Companies concerning the supply of goods or the provision of services
TFEU	Treaty on the Functioning of the European Union
Trade Unions	Corcym S.r.l. trade union representatives (RSUs/RSAs)



3. Scope of application

Procedures described in this document apply to the Group.

The application of the procedures described in this document does not exclude compliance with the regulations and other procedures that may be applicable to the activities regulated herein.

4. Reporting Persons

Persons who fall into the following categories may make Internal Reports:

- Candidates, if information on violations was acquired during the recruitment process or in other pre-contractual negotiation stage;
- Employees, including those on probationary period;
- former Employees, if the information on violations was acquired during the employment relationship;
- Self-employed;
- Collaborators;
- workers, both employed and self-employed, and Collaborators who work for Suppliers;
- Independent Professionals;
- Consultants;
- volunteers and interns, both paid and unpaid;
- persons who perform administrative, management, control, supervisory or representative functions, including de facto, at the Group Companies.

The procedures described in this document do not apply to Internal Reports made by persons other than those listed above. In the event that a person other than those listed above makes an Internal Report, it is left to the Report Manager to decide whether to follow up and, if so, in what manner.

5. Internal Reports

Internal Reports must be based on precise and concordant factual elements, report the information that constitutes the subject of the Report in as much detail as possible, and be accompanied, if necessary, by appropriate supporting documentation.

Personal data contained in Internal Reports having a generic content or otherwise not allowing for follow-up shall be deleted by the Report Manager immediately.

Internal Reports should desirably contain the identifying and contact details of the Reporting Person.

It is in any case granted to the Reporting Person to make Internal Reports anonymously, which are treated by the Manager in the same way as non-anonymous Internal Reports.

5.1 Internal Reports related to Corcym S.r.l.



Internal Reports related to Corcym S.r.l. may concern information on conducts, acts or omissions that harm the public interest or the integrity of the public administration or a private entity and consisting of:

- a) unlawful conducts relevant under Legislative Decree No. 231/2001 or violations of the Code of Ethics or the Model;
- b) offenses that fall within the scope of European Union or national acts listed in Annex 1 to Legislative Decree no. 24/2023 or national acts that constitute implementation of the European Union acts indicated in the Annex to Directive (EU) 2019/1937 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 and animal health and welfare; public health; consumer protection; privacy and personal data protection and networks and information systems security;
- c) acts or omissions affecting the financial interests of the European Union referred to in Article 325 TFEU specified in relevant secondary legislation of the European Union;
- d) acts or omissions affecting the internal market as referred to in Article 26(2) TFEU, including violations of the European Union's competition and state aid rules as well as violations affecting the internal market related to acts that violate corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law;
- e) acts or conducts that frustrate the object or purpose of the provisions of the acts of the European Union indicated in b), c), and d) above.

Information on the following may also be the subject of Internal Reports:

- a) conducts aimed at concealing the violations indicated above;
- b) unlawful activities not yet carried out but which the Reporting Person reasonably believes may occur in the presence of concrete precise and concordant elements;
- c) well-founded suspicions, also taking into account the definition of well-founded suspicions elaborated from time to time by ANAC through the Guidelines.

5.2 Internal Reports related to Companies other than Corcym S.r.l.

Internal Reports related to other Group Companies may concern information on any violation, even only suspected, of legal provisions, the Code of Ethics or internal policies and procedures and any wrongdoing or misconduct which can trigger the relevant Company's liability.

6. Internal reporting channel

The activation of the internal reporting channel and the assignment of its management to the Report Manager shall be decided by resolution of the Administrative Body of each Company (or by approval of a Company representative duly empowered).

As far Corcym S.r.l. is concerned, prior to the adoption of the above resolution, Corcym S.r.l.'s CEO shall inform the Trade Unions of the activation of the Internal Reporting channel.



To this end, in the absence of provisions of law or applicable collective bargaining agreements governing the manner of information and consultation with the Trade Unions, prior to the date scheduled for the activation of the internal reporting channel, Corcym S.r.l.'s CEO shall send to the Trade Unions a notice containing information about the imminent activation of the internal reporting channel and its functioning, making himself/herself available, at the request of the Trade Unions, for a meeting.

Prior to the adoption of the above resolution, the CEO of the Group companies shall also verify that:

- the channel presents, from a technical point of view, adequate guarantees to ensure the confidentiality of the identity of the Reporting Person, the Person Involved and the person in any case mentioned in the Internal Report, as well as the content of the Internal Report and the related documentation;
- the Report Manager is not in a situation of conflict of interest or in any case in situations (e.g., relationships of spouse, cohabitation, kinship within the sixth degree or affinity within the fourth degree with persons who exercise functions of administration, management, control, supervision or representation, even de facto, at the relevant Company; relations of a patrimonial or economic nature of a significant entity with the relevant Company; etc.) such as to limit or otherwise affect its autonomy and independence and, in the case of entrusting the management of the channel to a person who is part of the Company's organization or an internal office, holds a position hierarchically superordinate with respect to the other corporate functions;
- the personnel dedicated by the Report Manager to the management of the channel have received adequate and specific training on how to manage the channel and is bound by specific obligations of confidentiality and secrecy with respect to the information it becomes aware of in the performance of its duties.

For the purpose of the verification referred to above, the Report Manager to whom each Company proposes to entrust the management of the Internal Reporting channel shall transmit to the CEO of the Company a statement attesting the circumstances indicated above.

7. Management of Internal Reports

7.1 Submission of Internal Reports

The Group encourages the Group's stakeholders to speak up about violations (even suspected) and anything that does not constitute ethical, compliant or lawful behaviour.

Employees are invited to first contact their manager, their manager's manager, the local HR function, or the local Ethics and Compliance function and to use the internal reporting channel only if the report concerns one of the persons mentioned above or the report made to them has not been followed-up.



Internal Reports should be preferably submitted via Speak-Up by following the instructions provided through Speak-Up web-app, mobile app or hotline (phone numbers are attached in Annex 2 to this document).

In the event that the Internal Report is submitted via hotline and the Reporting Person does not consent to the recording or it is otherwise impossible to record the conversation, the Report Manager's staff shall arrange for its full transcription. The transcript shall be verified and, if necessary, corrected by the Reporting Person, who shall confirm its contents by signing it.

Internal Reports related to Corcym S.r.l. may also be submitted by sending an email to Corcym S.r.l. Report Manager's e-mail address (odv@corcym.com) or to the Chairman of Corcym S.r.l. Supervisory Body's e-mail address (paolo.gallarati@advant-nctm.com).

Internal Reports related to other Group companies may also be submitted by sending an email to the Group Report Manager's e-mail address (ethics.integrity@corcym.com).

If the Group Report Manager receives an Internal Report related to Corcym S.r.l., it shall forward it to Corcym S.r.l. Report Manager within 7 days of its receipt. Likewise, if Corcym S.r.l. Report Manager receives an Internal Report related to Companies other than Corcym S.r.l., it shall forward it to the Group Report Manager within 7 days of its receipt.

7.2 Acknowledgement of receipt

Immediately upon receipt or in any case within 7 days from the date of receipt of the Internal Report, the Reporting Manager shall issue to the Reporting Person notice of receipt of the Internal Report via Speak-Up, certified mail (or electronic mail, if no certified mail address is available) or registered letter to the addresses provided by the Reporting Person.

7.3 Registration

An identification code is assigned to each Internal Report by the Report Manager. The Internal Report is registered by the Report Manager in an electronic register in which the identification code, the information provided by the Reporting Person when submitting the Internal Reporting, the date of receipt, the date by which the Internal Reporting is to be processed, and the status are recorded. The register is kept in an electronic file, maintained in the manner described in paragraph 11 below.

7.4 Assessment of relevance and substantiation

Following the receipt of the Internal Report, the Report Manager makes an assessment regarding the relevance and substantiation of the Internal Report, based on the content of the latter.

If, as a result of this assessment, the Report Manager decides not to follow up on the Internal Report because it is irrelevant, manifestly unfounded due to the absence of factual elements



capable of justifying investigations, or of such general content that the facts cannot be understood, it shall inform the Reporting Person within 3 months from the date of the acknowledgement of receipt and, at the same time, update the status of the Internal Report. The Report Manager's decision not to take action on the Internal Report and the reasons given in support of the decision shall be documented by means of minutes kept in a special electronic file, maintained in the manner described in paragraph 11 below.

7.5 Preliminary investigation

If, on the other hand, the Report Manager considers further investigations necessary, it initiates an inquiry and, at the same time, updates the status of the Internal Report.

During the investigation, the Report Manager may:

- interview the Reporting Person, the Involved Person, and any additional persons mentioned in the Internal Report;
- request from any Employee, without the need to inform the respective hierarchical responsible in advance, the information and documents necessary to carry out the appropriate investigations;
- request the engagement of third parties to the CEO or to any other Company officer duly empowered who will have the burden of evaluating and carrying out the request, without prejudice to the Company's liability in case of non-compliance with the obligations under applicable law.

The Report Manager shall conclude the inquiry in time to inform the Reporting Person of the filing of the Internal Report pursuant to paragraph 7.5.1 below or to allow the CEO of the Group companies to define and communicate to the Report Manager the measures planned or adopted by the Company to follow up on the Internal Report and inform the Reporting Person of this within the time limit referred to in paragraph 7.5.2 below.

7.5.1 Dismissal

Once the investigation is completed, if the Report Manager decides to dismiss the Internal Report for lack of sufficient evidence or other reasons, shall inform the Reporting Person within 3 months from the date of the acknowledgement of receipt.

7.5.2 Communication of the outcomes of the investigation to the CEO

If, on the other hand, the Report Manager ascertains one or more violations or finds it impossible to proceed with the investigation of the violations that are the subject of the Internal Report due to the reticent behaviour of the Involved Person or any persons heard, it notifies the CEO of the relevant Company of the results of the investigation, together with any supporting documents, and at the same time requests to receive, no later than 3 months from the date of the acknowledgement of receipt, information on the measures planned or adopted by the Company to follow up on the Internal Report; then, within the same period, it informs the Reporting Person.



7.6 Documentation

The activity carried out by the Report Manager, at each stage of the management of the Internal Report, is documented by means of minutes, signed by the same and kept in a special electronic file, kept in the manner described in paragraph 11 below.

8. External Reports

Pursuant to Article 6 of Legislative Decree No. 24/2023 (the essential contents of which are reproduced in this paragraph), the Reporting Person, to the extent that he/she acts as a Corcym S.r.l.'s stakeholder, may make External Reports through the external reporting channel activated by ANAC in the manner described on its website if one or more of the following conditions occurs:

- the Reporting Person believes that the internal reporting channel activated by the Company does not comply with the provisions of Article 4 of Legislative Decree No. 24/2023;
- the Reporting Person has already made an Internal Report and this has not been followed up;
- the Reporting Person has well-founded reasons to believe that, if he or she makes an Internal Report, it would not be effectively followed up or that the Internal Report may result in the risk of retaliation;
- the Reporting Person has reasonable grounds to believe that the violations that are the subject of the Report may pose an imminent or obvious danger to the public interest.

9. Protection of the Reporting Person and supporting measures

It is forbidden for anyone acting in the name or on behalf of a Company to carry out retaliatory acts because of Internal Reports, External Reports, Public Disclosures or reporting to the judicial and accounting authorities against:

- the Reporting Persons;
- the authors of Public Disclosures;
- those who have filed a complaint;
- the Facilitators;
- the persons who are part of any Company's organization and who are related to the Reporting Persons, the authors of Public Disclosures and those who filed the complaint by a stable affective or kinship relationship within the fourth degree;
- the colleagues of the Reporting Persons, the authors of Public Disclosures and those who made the complaint who have a regular and current relationship with them;
- the entities owned by the Reporting Persons, the authors of Public Disclosures and those who made the complaints or for whom the same work as well as entities operating at or on behalf of the Company.

Retaliatory act means any conduct, act or omission, even if only attempted or threatened, carried out by reason of the Report, the report to the judicial or accounting authorities or the Public Disclosure and which causes or may cause the Reporting Person or the person who



made the report, directly or indirectly, unjust damage and, in particular, by way of example but not limited to:

- dismissal, suspension or equivalent measures;
- downgrade or non-promotion;
- change of duties, change of place of work, reduction of salary, change of working hours;
- suspension of training or any restriction on access to training;
- negative merit notes or negative references;
- the adoption of disciplinary measures or other sanction, including pecuniary;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavorable treatment;
- the 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;
- the non-renewal or early termination of a fixed-term employment contract;
- damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- placement on improper lists on the basis of a formal or informal sector or industry agreement, which may result in the person's inability to find employment in the sector or industry in the future;
- the early termination or cancellation of a contract for the supply of goods or services;
- the cancellation of a license or permit;
- the request for submission to psychiatric or medical examinations.

9.1 Special provisions for Corcym S.r.l.'s stakeholders and other persons or entities related to these latter

A person or entity who believes that he or she has been subjected by Corcym S.r.l. to a retaliatory act may notify the ANAC, which will inform the National Labor Inspectorate for measures within its jurisdiction. In the event of a finding by the judicial authority that the prohibition against retaliation has been violated, the person or entity that has suffered the retaliatory act accesses the protection measures provided by Article 19 of Legislative Decree No. 24/2023.

Reporting Persons may, in addition, request information, assistance and advice free of charge from the third sector entities on the list established at ANAC on how to report, protection from retaliation, the rights of the Person Involved as well as the terms and conditions of access to legal aid.

The protection and support measures indicated above are not guaranteed with respect to the Reporting Person and the person who has made a complaint of which criminal liability for the crimes of defamation or slander or civil liability, for the same title, in cases of malice or gross negligence has been established, even by a judgment of first instance.

10. Sanctions



The CEO of the relevant Company, in the event of establishment by the Report Manager of violations committed by one or more Employees or Collaborators of the same Company, transmits the information and documentation received from the Report Manager to HR to consider the application of any disciplinary measures. The CEO of the relevant Company shall also forward to HR, for the same purposes, information and documentation received from the Report Manager from which any defamatory and slanderous conducts of the Reporting Person emerges.

If, because of the assessment conducted by HR, the violations ascertained are not deemed to be subject to disciplinary measures nor there is any defamatory and slanderous conduct of the Reporting Person, HR shall dismiss the proceedings and notify the CEO of the relevant Company accordingly.

If, on the other hand, the violations are found to be liable to disciplinary action or if defamatory and slanderous conduct of the Reporting Person can be identified, HR, after assessing the seriousness of the violations or of the conduct engaged in by the Reporting Person, shall initiate the appropriate disciplinary action and promptly notify the CEO of the relevant Company of the outcome.

If the disciplinary actions put in place imply or cause the termination of the employment or collaboration relationship, the CEO of the relevant Company, with the support of the GC, evaluates the initiatives towards the competent judicial authorities and the judicial actions, respectively, to be put in place and established to protect the Company.

In the event of a determination by the Report Manager of violations committed by persons other than Employees or Collaborators of the Company, the CEO of the relevant Company shall take the measures provided by law or by the contract between the person who committed the violations and the Company.

11. Filing and storage of documentation pertaining to internal reports

Internal Reports and related documentation are archived by the Report Manager in *ad hoc* archives, paper and electronic, managed in ways that ensure that only the Report Manager and the Report Manager's staff can access them. Digital archives are kept on servers external to the Company so as to preclude access by system administrators.

Internal Reports and related documentation are kept for as long as necessary to follow up on them and in any case for no longer than five years from the date of the communication of the final outcome of the reporting procedure.

In the event that as a result of an Internal Report, the Company decides to initiate disciplinary proceedings or to initiate judicial or administrative proceedings or an arbitration or conciliation procedure, Internal Reports and related documentation shall be retained for a time equal to the duration of the proceedings or the period of prescription of the rights for the establishment, exercise or defense of which retention is necessary, even if longer than the retention periods indicated above.

12. Processing of personal data



Personal data relating to the Reporting Person, the Involved Person and the additional persons heard in the course of any investigation initiated by the Report Manager collected in the context of the management process of Internal Reports will be processed by each Company as autonomous data controller in compliance with applicable personal data protection laws and regulations - including, but not limited to, the GDPR and Legislative Decree No. 196/2003 - and in accordance with the information on the processing of personal data, made available by each Company. With respect to the processing of personal data collected through Speak-Up, Corcym S.r.l. will act as data controller in accordance with the information notice, attached to this document under Annex 1.

13. Filing

Without prejudice to what is specifically provided for in the previous paragraphs of this Procedure, all the activities envisaged hereunder shall be documented in writing and kept by the Report Manager in a special archive, either on paper or electronic, with a prohibition on altering, deleting or destroying the documentation in such a way as to allow for ex-post verification of its content.

14. Annexes

- Annex 1 – Information notice on the processing of personal data pursuant to Articles 13 of GDPR.
- Annex 2 – Hotline: phone numbers and instructions

ANNEX 1

Information pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)



What is this information about?

This information notice is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("**GDPR**") and applies to personal data relating to you – acting as Reporting Person or Involved Person – and collected by Corcym S.r.l. as data controller (hereinafter, "**Corcym**", "**we**" or "**our**", as appropriate) through Speak-Up.

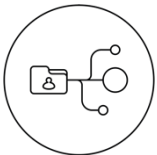


What categories of personal data do we collect?

We may collect the following categories of personal data:

- (1) Identifying data such as first name and last name;
- (2) Contact data such as e-mail address(es), telephone number(s), postal address(es);
- (3) Other information relating to you (including particular categories of personal data referred to in Articles 9 and 10 GDPR) contained in the reports or otherwise acquired during any investigation carried out by the Report Manager.

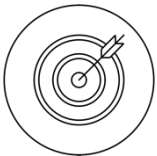
The provision of your personal data is optional but necessary to pursue the purposes listed below. In case you do not provide your personal data, it may be impossible for us to pursue such purposes.



How do we collect your personal data?

If you act as a Reporting Person, most of your personal data that we collect are provided to us directly by you when you submit a report via Speak-Up. If, on the other hand, you are an Involved Person, most of your personal data that we collect is provided to us by the Reporting Person.

We do not use any form of solely automated decision-making systems in processing your personal data.



For what purposes and on what legal basis do we process your personal data?

Your personal data will be processed to enable us to handle your reports and, in particular, to:

- (1) fulfil our legal duties;
- (2) protect company personnel, assets and property;
- (3) prevent, investigate, and prosecute the commission of offences and misconduct;
- (4) ascertain, exercise, or defend a right in judicial or administrative proceedings or in arbitration or conciliation proceedings.

The processing of your personal data for the purpose under point (1) does not require your consent as it is necessary for the fulfilment of legal obligations to which we are subject, pursuant to Article 6(1)(c) GDPR. The processing of your personal data for purposes under points (2), (3) and (4)

does not require your consent as it is necessary to pursue our legitimate interests underlying those purposes, pursuant to Articles 6(1)(f) and 9(2)(f) of the GDPR.



How do we process your personal data?

If you make reports via the speak-Up hotline, the conversation, with your consent, may be recorded for documenting the report.

In processing your personal data, we take appropriate technical and organisational measures to ensure a level of security appropriate to the risks of destruction, loss, alteration (accidental or unlawful) of personal data as well as unauthorised disclosure of or access to them.



How long do we keep your personal data?

Your personal data included in reports and related documentation will be kept as long as necessary to follow up on the reports, and in any case for no longer than five years from the communication of the outcome of the reporting procedure.

It is understood that if, as a result of the report, we decide to initiate disciplinary proceedings or to initiate proceedings in judicial or administrative courts or arbitration or conciliation proceedings, your personal data will be retained for a period of time equal to the duration of the proceedings or the period of prescription of the rights for the establishment, exercise or defence of which the processing is necessary, even if it exceeds the retention periods indicated above.



To whom are your personal data disclosed?

If you are acting as a Reporting Person, your personal data will be processed exclusively by the Report Manager and its auxiliaries, if any, who will act as persons authorized to process the data pursuant to Articles 29 and 32(4) of the GDPR and Article 2-quaterdecies of Legislative Decree No. 196/2003, and will not be disclosed to third parties without your consent.

If you act as an Involved Person, on the other hand, your personal data may be disclosed to the following parties, who will act as authorized persons, data processors or autonomous data controllers:

- (1) any auxiliaries of the Report Manager;
- (2) persons heard in the course of any investigation initiated by the Report Manager;
- (3) our employees or collaborators in any capacity;
- (4) employees or contractors in any capacity of any parent, subsidiary or associated companies;
- (5) service providers and consultants (e.g., lawyers, accountants, labor consultants, private investigators, etc.);
- (6) judicial and police authorities.

If any of the above-mentioned entities are located outside the European Economic Area (EEA), we will transfer your personal data – in the absence of an adequacy decision and none of the exceptions set out in Article 49 of



the GDPR – on the basis of the standard contractual clauses set out in Article 46(2)(c and d) of the GDPR.



Your rights under data protection legislation

Pursuant to Articles 15 to 22 of the GDPR, you have the right to:

- (1) be informed about the purposes and methods concerning the processing of your personal data;
- (2) access to your personal data;
- (3) rectify incomplete, inaccurate or outdated personal data;
- (4) obtain the erasure of your personal data;
- (5) obtain, in the cases provided for by law, the limitation of the processing of personal data;
- (6) object, in the cases provided for by law, in whole or in part, to the processing of personal data;
- (7) obtain, if technically feasible, the portability of personal data.

Where consent is required for the processing of personal data, you may also – at any time – revoke the consent already given, without affecting the lawfulness of the processing based on the consent given before revocation.

You may exercise the aforementioned rights and request any information on the processing of your personal data by contacting the Report Manager at email address odv@corcym.com.

Furthermore, you have the right to lodge a complaint with the Garante per la protezione dei dati personali (www.garanteprivacy.it), if you believe that your rights under the GDPR have been violated.

Pursuant to Article 2-undecies of Legislative Decree no. 196/2003, if the exercise of the aforementioned rights may result in an actual and real prejudice to the confidentiality of the identity of the Reporting Person, we shall not act on your request. We may, in any case, delay, limit, or exclude the exercise of your rights as long and to the extent necessary to safeguard the confidentiality of the identity of the Reporting Person. We shall give you a reasoned notice of this procedure. In this case, you may exercise your rights through the Garante per la protezione dei dati personali with the procedure set out in Article 160 of Legislative Decree no. 196/2003.



ANNEX 2

Hotline: phone numbers and instructions

Organization code is required and must be entered when requested.

ORGANIZATION CODE: **103223**

Country	Phone numbers and instructions
Albania	Number: +355 4 530 1801 Call charged at local rate
Algeria	Number: +213 983 29 93 38 Call charged at local rate
Angola	Number: +244 226 425 610 Call charged at local rate
Anguilla	Freephone: 1833 422 2005
Antigua and Barbuda	Freephone: 1833 422 2006
Argentina	Number: +54 11 2039 7280 Call charged at local rate
Australia	Number: +61 2 8284 6262 Call charged at local rate
Austria	Freephone: 0800 909 683
Bahamas	Freephone: 1833 422 2007
Bahrain	Number: +973 1650 1936
Bangladesh	Freephone: +880 (0) 9610 998462
Barbados	Number: +1 (246) 623 9631 Call charged at local rate
Belarus	Freephone: 8 820 0491 0089
Belgium	Freephone: 0800 89 326
Belize	Freephone: 1800 0130 076
Benin	Number: +229 20 90 0380 Call charged at local rate
Bermuda	Freephone: 1833 422 2008
Bhutan	Freephone: +975 2 379 003
Bolivia, Plurinational State of	Freephone: 800 105 122
Bosnia and Herzegovina	Number: +387 70 330 093 Call charged at local rate
Botswana	Freephone: 800 786 1103
Brazil	Number: +55 (11) 4700 8838 Call charged at local rate
Brunei Darussalam	Freephone: 801 4657
Bulgaria	Freephone: 800 210 0645
Burkina Faso	Number: +226 25 30 09 82 Call charged at local rate
Cambodia	Freephone: 1800 209 867
Cameroon	Freephone: +237 6 57 10 31 12
Canada	Number: +1 (514) 395 0496 Call charged at local rate
Cayman Islands	Number: +1 (345) 769 5580 Call charged at local rate
Chile	Number: +56 22 483 5917 Call charged at local rate



China	Country wide number with no supplier restriction: 400 120 1842 Call charged at local rate.
Colombia	Number: +57 601 242 1247 Call charged at local rate
Costa Rica	Number: +506 4036 0350 Call charged at local rate
Côte d'Ivoire	Freephone: +225 05 66 77 0918
Croatia	Freephone: 0800 7745
Cyprus	Freephone: 800 91142
Czechia	Freephone: 800 050 833
Denmark	Number: +45 43 31 09 61 Call charged at local rate
Dominica	Freephone: 1833 422 1998
Dominican Republic	Number: +1 (829) 947 1996 Call charged at local rate
Ecuador	Freephone: 1800 001 432
Egypt	Freephone: 0800 000 0083
El Salvador	Number: +503 2230 4752 Call charged at local rate
Estonia	Number: +372 609 3008 Call charged at local rate
Ethiopia	Freephone: 800 86 1919
Fiji	Freephone: 008 002 650
Finland	Freephone: 0800 392 912
France	Freephone: 080 554 3753
French Guiana	Freephone: 0800 99 1448
French Polynesia	Freephone: 0800 91 4886
Georgia	Freephone: 1800 008 013
Germany	Freephone: 0800 1818 952
Ghana	Number: +233 59 699 3553 Call charged at local rate
Greece	Freephone: 0080 0441 45924 Can only be connected by Cosmote mobile and OTE landline
Grenada	Number: +1 (473) 230 0333 Call charged at local rate
Guam	Freephone: 1833 809 6777
Guatemala	Number: +502 2302 8459 Call charged at local rate
Honduras	Freephone: 800 2791 6139
Hong Kong	Number: +852 3019 4193 Call charged at local rate
Hungary	Freephone: 06 809 845 89
Iceland	Number: +354 415 0349 Call charged at local rate
India	Freephone: 0008 0005 03159
Indonesia	Number: +62 21 8063 0074 Call charged at local rate
Ireland	Freephone: 1800 800 636
Israel	Number: +972 3374 1225 Call charged at local rate
Italy	Freephone: 800 147 694
Jamaica	Number: +1 (876) 677 9125 Call charged at local rate
Japan	Number: +81 3 6627 0734 Call charged at local rate



Jordan	Freephone: 0800 23801 No mobile access
Kazakhstan	Number: (+7) 877 2735 74582 Call charged at local rate; No mobile access
Kenya	Number: +254 20 765 0957 Call charged at local rate
Korea, the Republic of	Number: +82 2 3700 5146 Call charged at local rate
Kuwait	Freephone: +965 2205 5730
Latvia	Freephone: 800 05929
Lebanon	Freephone: first dial 01-426-801 and then 833 816 0913
Lithuania	Freephone: 8800 30366
Luxembourg	Number: +352 342 080 8982 Call charged at local rate
Malaysia	Number: +60 3 7724 3136 Call charged at local rate
Malta	Freephone: 8006 5144
Martinique	Freephone: 0800 90 1651
Mauritius	Number: +230 5 297 0999 Call charged at local rate
Mexico	Number: +52 55 4780 6198 Call charged at local rate
Moldova, the Republic of	Freephone: 080 060 016
Morocco	Number: +212 5 30 14 41 08 Call charged at local rate
Myanmar	Freephone: 0800 800 8062
Namibia	Freephone: +264 83 380 0103
Nepal	Freephone: 1800 001 0186
Netherlands	Number: +31 10 700 75 03 Call charged at local rate
New Zealand	Number: +64 9 913 5892 Call charged at local rate
Nicaragua	Number: +505 7513 7610 Call charged at local rate
Nigeria	Freephone: 070 8060 1221
North Macedonia	Number: +389 2551 3216 Call charged at local rate
Norway	Number: +47 24 14 06 01 Call charged at local rate
Oman	Freephone: 8007 4161
Pakistan	Freephone: 0080 0900 44437
Panama	Number: +507 308 4480 Call charged at local rate
Papua New Guinea	Freephone: 0008 61322
Paraguay	Freephone: 0098 0044 10266 No mobile access
Peru	Freephone: 0800 74535
Philippines	Freephone: 1800 8394 8474 Can only be connected by Globe Telecom device
Poland	Freephone: 800012953
Portugal	Freephone: 800 831 302
Puerto Rico	Number: +1 (787) 200 7305 Call charged at local rate



Qatar	Freephone: 00800 101 094
Réunion	Freephone: 1800 916 980
Romania	Freephone: 0800 400 653
Russian Federation	Freephone: 8 (800) 100 69 94
Saudi Arabia	Freephone: 800 850 1433
Serbia	Number: +381 10 520 043 Call charged at local rate
Seychelles	Freephone: 800 131
Singapore	Number: +65 6403 7051 Call charged at local rate
Slovakia	Freephone: 0800 113 418
Slovenia	Freephone: 0800 83115
South Africa	Number: +27 (21) 427 7937 Call charged at local rate
Spain	Number: +34 900 031 156 Call charged at local rate
Sri Lanka	Number: +94 (72) 091 0370 Call charged at local rate
Sudan	Freephone: +249 15 655 9883
Suriname	Freephone: 833 816 0919
Sweden	Freephone: 020 160 4703
Switzerland	Freephone: 080 000 5691
Taiwan, Province of China	Number: +886 2 7743 8912 Call charged at local rate
Tanzania, the United Republic of	Freephone: 0800 11 1020
Thailand	Number: +66 2 844 9693 Call charged at local rate
Trinidad and Tobago	Number: +1 (868) 224 1869 Call charged at local rate
Tunisia	Number: +216 31 300 338 Call charged at local rate
Turkey	Freephone: 0080 04488 28602
Turks and Caicos Islands	Freephone: 1833 462 1355
Uganda	Number: +256 41 423 8162 Call charged at local rate
Ukraine	Freephone: 0800 801 205
United Arab Emirates	Freephone: 800 0444 0408
United Kingdom	Freephone: 080 0022 4118
United States of America	Number: +1 (669) 288 7154 Call charged at local rate
Uruguay	Freephone: 0004 1598 5762
Venezuela, Bolivarian Republic of	Number: +58 212 335 7722 Call charged at local rate
Viet Nam	Number: +84 1900 3271 Call charged at local rate
Virgin Islands (British)	Freephone: 1833 462 1356
Virgin Islands (U.S.)	Freephone: 1833 724 6398
Zimbabwe	Freephone: +263 867 742 2010