

WHISTLEBLOWING REPORT FORM

It is recommended to attach all the documentation that you believe may be useful to corroborate the Report; if the Report is made verbally, such documentation can be delivered directly.

DATA OF THE REPORTING PERSON

Name and Surname

Membership Structure and Qualification

Selected contact channels (e.g. private email address, telephone number, etc.)

Does the Reporting Person have a private interest in the Report? Yes No

Specify the nature of the private interest linked to the report:

Is the Reporting Person jointly responsible for the violations he/she reports? Yes No

REPORTED OFFENCE

Period/date on which the event occurred

Area of business operations to which the fact may be referred

Persons involved:

Internal parties	External parties

Description of the fact that is the subject of the Reporting

Other subjects who may report on the facts covered by the Report

Internal parties	External parties

Who are the other parties to whom the Incident Report has been forwarded? Yes No

Specify which subjects and when

Date

Signature *(not mandatory)*

Classification: **Highly Confidential**

PRIVACY POLICY - REPORTING PERSON

*Pursuant to art. 13 of Regulation (EU) 2016/679 on the processing of personal data
as part of the reporting of violations pursuant to Legislative Decree 24/2023*

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter "GDPR") and the applicable legislation on the protection of personal data, we inform you that the personal data provided as a Reporting Person (hereinafter also "Data Subject") through this "Report Form" or in any case provided in the event of an internal report of a violation pursuant to Legislative Decree 24/2023, will be processed, in compliance with the aforementioned legislation and in accordance with the principles of correctness, lawfulness and transparency by personnel authorized by Gilardoni S.p.A. a Socio Unico pursuant to Article 29 of the GDPR and Article 2-quaterdecies of the Code on the protection of personal data (Legislative Decree 196/2003).

1. DATA CONTROLLER

The Data Controller is Gilardoni S.p.A. a Socio Unico (hereinafter also referred to as the "Company" or "Data Controller") with registered office in Via Arturo Gilardoni, 1 - 23826 Mandello del Lario (LC), which can be contacted at the e-mail address privacy@gilardoni.it and by the number 0341705111.

2. PURPOSE OF THE PROCESSING AND LEGAL BASIS

Personal data are processed for the management of internal reports of alleged violations, or conduct, acts or omissions that harm the public interest or the integrity of the public administration or private entity, as defined by Article 2 paragraph 1 letter a) of Legislative Decree no. 24/2023, of which the Reporting Person has become aware due to his/her collaboration relationship with the Data Controller. The personal data processed are those contained in the internal report, and/or in acts and documents attached to it that refer to the Reporting Person.

o Personal data may also be processed to carry out the necessary investigative activities aimed at verifying the validity of what has been reported, as well as, if necessary, for the adoption of appropriate corrective measures and the introduction of appropriate disciplinary and/or judicial actions against those responsible for violations. The legal basis that legitimizes the processing of personal data is represented by the fulfilment of a legal obligation to which the Data Controller is subject (Article 6, paragraph 1, letter c) of the GDPR), and specifically, provided for by Legislative Decree 231/2001, Law 179/2017 and Legislative Decree 24/2023. The processing may also concern special data and data relating to criminal convictions and offences if included in the report in accordance with the provisions of Articles 9 and 10 of the GDPR.

3. CATEGORIES OF DATA RECIPIENTS

The personal data provided will be processed by the members of the Supervisory Body (SB), in their capacity as subjects authorised to process by the Data Controller, in order to follow up and respond to the reports received, in compliance with the provisions of Legislative Decree 24/2023 and the Organisation, Management and Control Model pursuant to art. 6 of Legislative Decree 231/01. In the event that the Company entrusts a third party with the task of managing the reporting channel, the aforementioned personal data will be processed by this subject in its capacity as Data Processor designated by the Data Controller pursuant to art. 28 of the GDPR. These data will be processed exclusively by expressly authorized personnel and in compliance with the provisions of Legislative Decree no. 24/2023. Personal data will not be disseminated but may be transmitted to the Judicial Authority. None of the data collected will be transferred to third countries, understood as countries not belonging to the European Economic Area (EEA). If the report is external and is submitted, as required by art. 6 and 7 of Legislative Decree no. 24/2023, to the National Anti-Corruption Authority (ANAC), information relating to the processing of personal data will be provided by the Authority itself through the appropriate channels.

4. RETENTION TIME CRITERIA

The internal reports and the related documentation will be kept for the time necessary to process the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations referred to in Article 12 of this Legislative Decree no. 24/2023 and the principle referred to in Articles 5(1)(e) of the GDPR and 3(1)(e) of Legislative Decree No. 51 of 2018. After the maximum period of five years, the information relating to the report may be kept by the Company in order to guarantee and preserve its right of defence and to demonstrate, where required, the correct management of the reports received. In this case, the personal data of the reporting person will be anonymised.

5. METHODS OF DATA PROCESSING

The processing of personal data will be carried out exclusively by expressly authorized personnel, in such a way as to guarantee the confidentiality of the identity of the Reporting Person and of the content of internal reports and related documentation, adopting appropriate technical and organizational measures to protect them from unauthorized or unlawful access, destruction, loss of integrity and confidentiality, even accidental. In order to guarantee the confidentiality of the Reporting Person for the entire duration of the management of the internal report, the identity of the same will be known by the parties expressly authorized to manage the reports. Except in cases where liability for slander and defamation can be established pursuant to the provisions of the Criminal Code or Art. 2043 of the Italian Civil Code or, where applicable, in the context of criminal proceedings and in the manner and limits of the provisions of art. 329 of the Code of Criminal Procedure, the identity of the Reporting Person is protected in any context subsequent to the report. Therefore, subject to the aforementioned exceptions, the identity of the Reporting Person may not be revealed without the Reporting Person's express consent, and all those who receive or are involved in the handling of the report are required to protect the confidentiality of such information.

6. PROVISION OF DATA

The provision of personal data is optional. Failure to provide them could, however, jeopardize the investigation of the report: anonymous reports, in fact, will be taken into consideration only if they are adequately detailed and made in great detail, so as to bring to light facts and situations related to specific contexts.

7. RIGHTS OF THE DATA SUBJECTS

The rights referred to in Articles 15-22 of the GDPR may be exercised, within the limits of the provisions of Article 2-undecies, paragraph 3, of Legislative Decree no. 196/2003, by contacting the Data Controller through the contacts indicated above. In particular, the rights identified above cannot be exercised by means of a request to the Data Controller, or by complaint pursuant to Article 77 of the GDPR to the Data Protection Authority, if the exercise of these rights may result in an actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which he or she has become aware due to his or her employment relationship or the functions performed. The exercise of the aforementioned rights may, in any case, be delayed, limited or excluded by reasoned communication made without delay by the Data Controller, unless the communication could compromise the purpose of the limitation, for the time and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Reporting Person, of the Person involved or of the persons involved in various ways in the reports. In such cases, pursuant to art. 2-undecies, par. 3, of Legislative Decree no. 196/2003, the Data Subject has the right to exercise the aforementioned rights through the Guarantor Authority in the manner set out in Article 160 of the aforementioned Legislative Decree. In cases where you believe that the processing of your personal data is in violation of the provisions of the GDPR, you may lodge a complaint with the Data Protection Authority, as provided for by art. 77 of the GDPR itself (with the exclusion of the limitations on the exercise of the rights set out above and provided for by Article 2-undecies, paragraph 3, of Legislative Decree no. 196/2003), or to take legal action (Article 79 of the GDPR).