

FNA S.p.A. Policy for the handling of internal reports

1. PURPOSE OF POLICY

The purpose of this Policy is to regulate the process of receipt, analysis and processing of internal reports by FNA S.p.A. ("FNA" or "Company"), in compliance with current legislation.

2. REGULATORY FRAMEWORK

On 15 March 2023, Legislative Decree No. 24 dated 10.3.2023 ("Decree") was published in the Official Gazette on the implementation of the 2019/1937 EU Whistleblower Protection Directive, concerning the protection of persons who report breaches of Union law and containing provisions concerning the protection of persons who report breaches of national legislation.

The Decree regulates internal reports, external reports and public disclosures. The Decree, in transposing the indications of the European Directive, has provided for a diversified system for the submission of reports, i.e. internal channel in public and private entities, external channel at ANAC, public disclosure, without prejudice, of course, to the duty to refer to the judicial authorities where the conditions are met. The legislator has provided that specific "internal channels" must be set up within the entities to which the legislation applies to receive and process reports. The use of these channels is encouraged, as they are closer to the origin of the matters reported. The preference given to internal channels is also evidenced by the fact that, only where particular conditions specifically provided for by the legislator are met, then whistleblowers may have recourse to the 'external channel' set up at ANAC or, where further certain conditions are met, to public disclosure.

The activation of a channel for internal reporting is the responsibility of FNA.

The National Anti-Corruption Authority (ANAC) is in charge of activating an external reporting channel and adopting guidelines on procedures for the submission and handling of external reports.

The ANAC with Resolution No. 311 of 12 July 2023 made available the "Guidelines on the protection of persons who report breaches of Union law and the protection of persons who report breaches of national laws. Procedures for the submission and handling of external reports" ("ANAC Guidelines").

In order to help the recipients of this Policy understand the regulatory framework, the following information is provided.

On 26 November 2019, the European Union published EU Directive 2019/1937 EU Whistleblower Protection Directive regulating the protection of whistleblowers within the Union through minimum standards of protection, aimed at standardising national laws, taking into account that those who report threats or harm to the public interest that they learn about in the course of their professional activities exercise their right to freedom of expression. The purpose of the regulations is to strengthen the principles of transparency and accountability and to prevent the commission of offences. The Directive has provided protection for the whistleblower without differentiating between the public and private sector. In addition to the obligation of confidentiality with regard to the identity of the whistleblower, of the persons involved and of the reported person, it provides for the prohibition of retaliation, with an exemplification of retaliatory offences, and support measures in favour of the whistleblower.

The expression whistleblower literally means "one who blows the whistle" and alludes to the gesture by which a policeman or referee intervenes to stop illegal behaviour or a foul play, drawing everyone's attention. By way of metaphor, a whistleblower is defined as a person who reports

unlawful behaviour or violations of regulations that he or she witnesses within the organisation or company, public or private, in which he or she works; the most common translation in Italian is *segnalatore* or *segnalante*.

3. SCOPE OF THE DECREE

The Decree regulates the protection of persons who report violations of national or European Union law that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in a public or private work environment.

The provisions of the Decree do not apply to:

- disputes, claims or requests linked to an interest of a personal nature of the reporting person or of the person lodging a complaint with the judicial or accounting authorities that relate exclusively to his or her individual work or public employment relationship, or to his or her work or public employment relationship with hierarchically superior figures;
- reports of violations where already mandatorily regulated by the European Union or national acts indicated in Part II of the Annex to the Decree or by national acts that constitute implementation of the European Union acts indicated in Part II of the Annex to Directive (EU) 2019/1937, even if not indicated in Part II of the Annex to the Decree;
- reports of national security breaches, as well as of procurement relating to defence or national security aspects, unless these aspects are covered by relevant secondary EU law.

This is without prejudice to the application of national or European Union provisions on classified information, forensic and medical professional secrecy, secrecy of court deliberations, rules of criminal procedure, the autonomy and independence of the judiciary, national defence and public order and security, and the exercise of workers' rights.

3. DEFINITIONS

FNA or Company: FNA S.p.A..

Code of Ethics: Code of Ethics adopted by the FNA Board of Directors.

Decree: Legislative Decree No. 24 of 10.3.2023 on the implementation of the 2019/1937 EU Whistleblower Protection Directive, concerning the protection of persons who report breaches of Union law and laying down provisions concerning the protection of persons who report breaches of national laws.

Model 231: Organisation, Management and Control Model, pursuant to Legislative Decree No. 231 of 8 June 2001, adopted by the Board of Directors of FNA.

Reporting Committee: a specific company committee, intended as an autonomous internal office dedicated to carrying out the activities set out in Article 5, paragraph 1 of the Decree; the FNA Reporting Committee is composed of the CFO and Director of Organisation, the Director of Personnel and the members of the Supervisory Board, the latter for the management of any reports concerning unlawful conduct relevant under Legislative Decree no. 231 of 8 June 2001, or violations of Model 231 and of FNA's Code of Ethics.

Violations: conduct, acts or omissions detrimental to the public interest or integrity of the Company and consisting of:

- 1) unlawful conduct pursuant to Legislative Decree no. 231 of 8 June 2001, or violations of Model 231 and of FNA's Code of Ethics;
- 3) offences falling within the scope of the European Union or national acts indicated in the annex to the Decree or national acts constituting implementation of the European Union acts indicated in the annex to Directive (EU) 2019/1937, although not indicated in the annex to the Decree, relating to the following areas: 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 safety and animal health and welfare; public health; consumer protection; privacy and personal data protection and security of networks and information systems;
- 4) acts or omissions affecting the financial interests of the Union as referred to in Article 325 of the Treaty on the Functioning of the European Union specified in the relevant secondary law of the European Union;
- 5) acts or omissions relating to the internal market, as referred to in Article 26(2) of the Treaty on the Functioning of the European Union, including infringements of EU competition and State aid rules, as well as infringements relating to the internal market related to acts in breach of 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;
- 6) acts or conduct that frustrate the object or purpose of the provisions of Union acts in the areas indicated in (3), (4) and (5) above.

Information on violations: informazioni, compresi i fondati sospetti, riguardanti violazioni commesse o che, sulla base di elementi concreti, potrebbero essere commesse nell'organizzazione con cui la persona segnalante o colui che sporge denuncia all'Autorità giudiziaria o contabile intrattiene un rapporto giuridico ai sensi dell'articolo 3, comma 1 o 2, del Decreto, nonché gli elementi riguardanti condotte volte a occultare tali violazioni.

GDPR: Regulation 2016/679/EU (General Data Protection Regulation).

Report or Reporting: written or oral communication of information on violations.

Internal report: the written or oral communication of information on violations, submitted through the internal reporting channel made available by the Company pursuant to Article 4 of the Decree.

External report: the written or oral communication of information on violations, submitted through the external reporting channel made available by ANAC pursuant to Article 7 of the Decree.

Anonymous report: report in which the identity of the Whistleblower is not made explicit by the latter, nor can be unambiguously identified, i.e. reports from which the identity of the Whistleblower cannot be established. Such reports shall be treated as reports to be dealt with in accordance with the criteria set out in this Policy; it should be noted that the choice to make an anonymous report may imply that the Company may not be able to apply the obligations of "following up" and "providing feedback" to such reports and the relevant deadlines laid down in the Decree; in any case, the anonymous reporter or whistleblower, subsequently identified, who has notified ANAC that he/she has suffered retaliation may benefit from the protection that the Decree guarantees against retaliatory measures.

Report made with malice or gross negligence: report that the results of the investigative phase prove to be without factual evidence and made in full awareness of the non-existence of a breach or non-compliance or of the fact that the person reported was not involved in the breach or non-compliance, or with gross negligence in the assessment of the facts.

Inadmissible report: the report is considered inadmissible and is directly dismissed for the following reasons:

- manifest unfoundedness due to the absence of suitable elements to justify the investigations, i.e. the absence of suitable elements of fact attributable to the violations typified in Article 2(1)(a) of the Decree;
- manifest absence of the prerequisites for reporting, with particular reference to persons working in private sector entities;
- ascertained generic content of the report of offence such as not to allow comprehension of the facts, or report of offence accompanied by inappropriate or irrelevant documentation such as not to allow comprehension of the content of the report;
- production of documentation only in the absence of a report of misconduct;
- lack of data constituting essential elements of the report of wrongdoing.

The ANAC Guidelines also specify that information on reportable or reportable breaches does not include information that is manifestly unfounded, information that is already fully in the public domain, and information acquired only on the basis of indiscretions or rumours that are not very reliable (so-called "rumours").

Substantiated report: report in which the allegations (in particular, the circumstances of time and place in which the reported event occurred, the description of the event, as well as personal details or other elements enabling the identification of the person to whom the reported facts are to be attributed) are characterised by a degree of detail sufficient, at least in the abstract, to bring out precise and concordant facts and situations, relating them to specific contexts, and to enable the identification of elements useful for the purposes of verifying the validity of the report. Substantiated reports can be further subdivided into:

- verifiable substantiated reports: if, in view of the contents of the report, it is possible in concrete terms, on the basis of the available investigative tools, to verify whether the report is well-founded within the company;
- substantiated reports that cannot be verified: if it emerges during the preliminary checks that it is not possible, on the basis of the available investigative tools, to verify whether the report is well-founded.

Public Disclosure or Disclosing publicly: making information about violations publicly available through the press or electronic media or otherwise through means of dissemination capable of reaching a large number of people.

Reporting person: the natural person making the report or public disclosure of information on violations acquired in the context of his or her work; the persons who may make a report are:

- the Company's employees;
- self-employed workers, as well as holders of a collaboration relationship, who carry out their work activities at the Company;

- workers or collaborators, who carry out their work activities at entities in the public or private sector that supply goods or services or carry out works in favour of the Company;
- self-employed professionals and consultants who work for the Company;
- volunteers and trainees, paid and unpaid, who work for the Company;
- shareholders and persons with administrative, management, control, supervisory or representative functions in the Company.

Facilitator: a natural person assisting a reporting person in the reporting process, operating within the same work environment and whose assistance must be kept confidential.

Work environment: current or past work or professional activities carried out in the context of the relationships referred to in Article 3(3) or (4) of the Decree through which, irrespective of the nature of such activities, a person acquires information about violations and in the context of which he or she could risk retaliation in the event of a report or public disclosure or a complaint to the judicial or accounting authorities.

Person involved: the natural or legal person mentioned in the internal or external report or in the public disclosure as the person to whom the breach is attributed or as a person otherwise involved in the reported or publicly disclosed breach.

Retaliation: any conduct, act or omission, even if only attempted or threatened, occurring as a result of the report, the complaint to the judicial or accounting authorities or the public disclosure and which causes or may cause the reporting person or the person making the complaint, directly or indirectly, unjust damage. The Decree indicates the following cases which, if they fall within this definition, constitute retaliation:

- dismissal, suspension or equivalent measures;
- downgrading 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 it;
- negative merit notes or references; the adoption of disciplinary measures or any other sanction, including a fine;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavourable treatment;
- 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, in particular on social media, or economic or financial loss, including loss of economic opportunities and loss of income;
- 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;
- early termination or cancellation of a contract for the supply of goods or services;
- cancellation of a licence or permit;
- request to undergo psychiatric or medical examinations.

Follow-up: the action taken by the person entrusted with the management of the reporting channel to assess the existence of the reported facts, the outcome of the investigation and any measures taken.

Feedback: providing the reporting person with information on the follow-up given or intended to be given to the report.

SB: Supervisory Board pursuant to Legislative Decree No. 231 of 8 June 2001, appointed by the FNA Board of Directors.

4. GENERAL PRINCIPLES

Prohibition of retaliation: the reporting person may not suffer any retaliation; protection of the reporting person also applies:

- if the legal relationship has not begun (selection and pre-contractual stages);
- during the probationary period;
- after termination of the relationship (if the information was acquired during the relationship).

The protections provided for the reporting person also apply to:

- so-called facilitators (those who assist the worker in the reporting process);
- persons in the same work environment as the reporting person or the person who made a complaint to the judicial or accounting authority or made a public disclosure and who are related to them by a stable emotional or kinship link up to the fourth degree;
- colleagues of the reporting person or of the person who made a complaint to the judicial or accounting authority or made a public disclosure who work in the same work environment as the reporting person and who have a regular and current relationship with that person;
- entities owned by the reporting person or the person who made a complaint to the judicial or accounting authority or made a public disclosure, or for which the same persons work, as well as entities working in the same work environment as the aforementioned persons.

Duty of Confidentiality: reports may not be used beyond what is necessary to adequately follow them up. The Decree also states that:

- internal reporting channels must guarantee the confidentiality of the reporting person, the facilitator, the person involved or otherwise the persons mentioned in the report, the content of the report and the related documentation;
- the identity of the reporting person and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those competent to receive or follow up reports, expressly authorised to process such data pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679 and Article 2-quaterdecies of the Personal Data Protection Code laid down by Legislative Decree No 196 of 30 June 2003;
- in criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and to the extent provided for in Article 329 of the Code of Criminal Procedure;

- In the context of disciplinary proceedings, the identity of the reporting person may not be disclosed, where the disciplinary charge is based on investigations that are separate from and additional to the report, even if consequent to it. Where the charge is based, in whole or in part, on the report and where knowledge of the identity of the person reporting is indispensable for the defence of the person charged, the report shall be usable for the purposes of the disciplinary proceedings only if the person reporting the matter has given his/her express consent to the disclosure of his/her identity; the person reporting the matter shall be notified in writing of the reasons for the disclosure of confidential data in such a case, as well as in the circumstances in which the disclosure of the identity of the person reporting the matter and of the information is indispensable also for the defence of the person charged;
- the Company, ANAC, as well as the administrative authorities to which ANAC transmits external reports falling within their competence, protect the identity of the persons involved and of the persons mentioned in the report until the conclusion of the proceedings initiated on account of the report, in compliance with the same guarantees provided for in favour of the reporting person;
- the report is exempt from access provided for in Articles 22 et seq. of Law No. 241 of 7 August 1990 and Articles 5 et seq. of Legislative Decree No. 33 of 14 March 2013;
- without prejudice to the provisions of the preceding points, the person involved may be heard, or, at his or her request, shall be heard, also by means of a cartel procedure through the acquisition of written observations and documents.

Processing of Personal Data (Privacy Protection): All processing of personal data, as provided for in the Decree, is carried out by the Company in accordance with Regulation (EU) 2016/679 and Legislative Decree No. 196 of 30 June 2003. Personal data that are manifestly not useful for the processing of a specific report are not collected or, if accidentally collected, are deleted immediately. The processing of personal data relating to the receipt and management of reports is carried out by the Company as data controller, in compliance with the principles set out in Articles 5 and 25 of Regulation (EU) 2016/679, providing appropriate information to the reporting persons and the persons involved pursuant to Articles 13 and 14 of the same Regulation (EU) 2016/679, as well as taking appropriate measures to protect the rights and freedoms of the persons concerned. The Company regulates the relationship with external providers who process personal data on their behalf pursuant to Article 28 of Regulation (EU) 2016/679.

Conditions for the protection of the reporting person: The protective measures provided for in the Decree apply to the reporting person when the following conditions are met:

- at the time of the report or denunciation to the judicial or accounting authorities or of public disclosure, the reporting or denouncing person had reasonable grounds to believe that the information on the violations reported, publicly disclosed or denounced was true and fell within the objective scope of the Decree;
- the report or public disclosure was made on the basis of the provisions of Chapter II "Internal reporting, external reporting, obligation of confidentiality and public disclosure" of the Decree.

The reasons that led the person to report or publicly disclose are irrelevant to his or her protection.

Without prejudice to the provisions of Article 20 "Limitation of liability" of the Decree, when the criminal liability of the reporting person for the offences of defamation or slander or, in any case,

for the same offences committed with the report to the judicial or accounting authorities or his civil liability, for the same reason, in cases of wilful misconduct or gross negligence, is established, even by a judgment of first instance, the protections provided for in the Decree are not guaranteed and a disciplinary sanction is imposed on the reporting or whistleblowing person.

5. FNA'S INTERNAL REPORTING PROCESS

5.1. INTERNAL REPORTING CHANNELS ACTIVATED BY FNA

FNA has activated the following internal reporting channels:

- use of the My Whistleblowing IT platform made available by the specialised supplier Zucchetti, which can be accessed on the Company's website by means of a link published in the "Responsibilities" section at <https://www.fnacompressors.com/it/responsabilita/>; the platform contains operating instructions for the use of this tool; the aforementioned portal allows reports to be made by filling in specific information fields;
- face-to-face meeting with the Manager of FNA's internal reporting channels, i.e. the FNA Reporting Committee; this type of report is collected in a face-to-face meeting with the Manager of the internal reporting channels, after having submitted the data processing notice.

Without prejudice to the possibility of transmitting reports by any useful means, it should be noted that the use of additional channels and means of reporting other than those listed above, implemented by the Company in accordance with the legislation in force, may not allow the Company to guarantee the confidentiality of the identity of the reporting person, of the person involved and of the person mentioned in the report, as well as the content of the report and of the relevant documentation.

In this respect, should the reporter intend to use a channel such as sending a paper letter (a method allowed, but not adopted by FNA as an internal reporting channel), in order to ensure in any case the confidentiality required by the legislation, as explained in the ANAC Guidelines, it is advisable that the report is placed in two sealed envelopes: the first with the identification data of the reporter together with a photocopy of the identification document; the second with the report, so as to separate the identification data of the reporter from the report. Both envelopes should then be placed in a third sealed envelope marked "confidential" on the outside for the FNA Reporting Committee.

If the internal report is submitted to a person other than the person identified and authorised by the Company, the person who received the report must forward it, in its original and with any attachments within seven days of its receipt, to the Manager of FNA's internal reporting channels, protecting the confidentiality of the reporter's identity and simultaneously notifying the reporting person of the transmission. For example, if a report is received in a sealed envelope on which it is indicated that it is a whistleblowing report and/or addressed to the Reporting Committee, the person who receives it, without opening it, promptly forwards it to the FNA Reporting Committee.

Failure to communicate a report received constitutes a violation of this Policy and may result in appropriate action being taken, including disciplinary action.

5.2. FUNCTIONS AND TASKS

FNA has identified the following functions and tasks:

- Manager of internal reporting channels: the function of Manager of internal reporting channels is entrusted to the FNA Reporting Committee, formally mandated to carry out the following activities:
 - issue the reporting person with an acknowledgement of receipt of the report within seven days from the date of receipt;
 - maintain contact with the reporting person with the possibility of requesting additional information from the latter, if necessary;
 - diligently follow up on reports received;
 - provide feedback on the report within three months from the date of the acknowledgement of receipt or, in the absence of such an acknowledgement, within three months from the expiry of the seven-day period from the submission of the report;
 - provide clear information on the channel, procedures and prerequisites for making internal reports, as well as on the channel, procedures and prerequisites for making external reports.
- Corporate Bodies, Departments and Functions of FNA: the Reporting Committee, in compliance with the main general principles, and in particular the obligation of confidentiality, in order to follow up and provide feedback to the reports received, may involve the competent Bodies, Departments and Corporate Functions of FNA, which are required to support the Reporting Committee by carrying out all the internal checks and investigations deemed necessary to assess the validity of the reports received and, in such circumstances, to identify the appropriate corrective actions and to formalise adequate and timely feedback to the reporting parties by the Reporting Committee;
- Experts or appraisers external to FNA; the Reporting Committee, in compliance with the general principles, and in particular with the obligation of confidentiality, subject to authorisation by the Bodies and Persons in charge of FNA, in order to follow up and provide feedback on the reports received, may involve external Experts or experts, identified by FNA in order to support the performance of all the internal checks and investigations deemed necessary for the assessment of the validity of the reports received and, in such circumstances, for the identification of the appropriate corrective actions and for the formalisation of adequate and timely feedback to be given to the reporters by the Reporting Committee;
- Delegated bodies (CEO) and Board of Directors of FNA: the CEO and/or the Board of Directors of FNA, consistently and in accordance with their specific functions and prerogatives, examine the results of the preliminary investigation activities carried out with reference to the reports received for the appropriate assessment and decisions.

5.3. MANAGEMENT OF FNA'S INTERNAL REPORTING CHANNELS

5.3.1. REPORT RECEIPT AND ADMISSIBILITY CHECK

Once the report has been acquired through the channels specifically set up and identified in this Policy, the Reporting Committee notifies the reporting person that it has received the report within seven days from the date of its acquisition, except in the case of anonymous reports that make it impossible to provide feedback (e.g., anonymous paper reports).

After receiving the report, the Reporting Committee starts a preliminary verification aimed at classifying the report against the subjective and objective requirements laid down in the Decree.

In particular, the process implemented by the Company involves an assessment of the existence of the essential requirements of the report in order to assess its admissibility and thus be able to grant the reporter the envisaged protections. For the assessment of the above-mentioned requirements, the Reporting Committee applies criteria similar to those used by the ANAC, considering a report inadmissible for one of the following reasons

- manifest unfoundedness owing to the absence of elements capable of justifying investigations, i.e. the absence of suitable elements of fact referable to the violations typified by Article 2(1)(a) of the Decree
- manifest absence of the prerequisites for making the report, with particular reference to persons working for private-sector entities;
- ascertained generic content of the report of offence such as not to allow the facts to be understood, or report of offence accompanied by inappropriate or irrelevant documentation such as not to allow the content of the report to be understood;
- production of only documentation in the absence of the report of unlawful conduct;
- lack of data constituting essential elements of the report of offences.

If what is reported is not adequately substantiated, the Reporting Committee may request additional information from the whistleblower through the dedicated channel, or even in person if the whistleblower has requested a direct meeting.

With regard to inadmissible reports, the Reporting Committee proposes to the Company's Delegated Body that the reports be filed.

The Reporting Committee maintains contact with the reporting person, keeping track of the activity carried out and providing information, also ex officio, on the progress of the investigation, at least with reference to the main decision-making hubs.

5.3.2. ANALYSIS AND PRELIMINARY INVESTIGATION OF ELIGIBLE REPORTS

Once the admissibility of the report has been assessed, as whistleblowing, the Reporting Committee starts the internal investigation of the reported facts or conduct in order to assess its existence.

The reporting process is carried out by separating the identification data of the reporter (where made available by the latter) and of the reported person from the content of the report, proceeding to anonymisation, so that the report can be processed anonymously, with the possibility of subsequently re-associating it with the identity of the reporter, only in cases where this is strictly necessary and permitted by the applicable legislation.

The Reporting Committee proceeds with an analysis of the admissible reports, i.e. of the substantiated reports, in order to identify the corporate subjects - Bodies, Departments and Corporate Functions and/or external FNA experts or appraisers (together "FNA competent Subjects") - competent by subject to whom the contents of the reports should be submitted, suitably anonymised, for the performance of all the internal checks and investigations deemed necessary for the assessment of the merits of the reports received and, in such circumstances, for the identification of the appropriate corrective actions and for the formalisation of adequate and timely reports to be made to the reporting parties by the Reporting Committee.

In order to carry out its preliminary investigation, the Reporting Committee may also initiate a dialogue with the whistleblower, asking him/her for clarifications, documents and further information, again through the dedicated channel in the IT platforms or in person. Where necessary, it may also acquire deeds and documents from other offices of the Company, avail itself of their support, involve third persons through hearings and other requests, always taking care that the protection of the confidentiality of the reporter and of the reported person is not compromised.

The purpose of the preliminary investigation activities on the reports is to proceed, within the limits of the tools available to the Company, with specific assessments, analyses and evaluations as to the reasonable grounds of the reported factual circumstances, as well as to provide any indications as to the adoption of appropriate corrective actions on the areas and business processes concerned.

Should the circumstances of substantiated reports arise, which are however not verifiable on the basis of the available investigative tools, and consequently it is not possible to verify the merits of the report, the Reporting Committee shall immediately inform the FNA Delegated Body for the assessments and decisions within its competence.

The purpose of the preliminary investigation is to reconstruct, on the basis of the documentation and official information, as well as the information made available, the management and decision-making processes followed. The perimeter of analysis of the preliminary investigation does not include, except to the extent of manifest unreasonableness, the merits of management decisions or decisions of opportunity, whether discretionary or technical-discretionary, made from time to time by the corporate structures/positions involved.

The Reporting Committee, by means of the checks and internal investigations carried out by the competent FNA's Subjects, carries out the preliminary investigation, at the end of which it formulates a judgement on the reasonable grounds or otherwise of the facts reported, with possible indications as to the adoption, by the competent FNA's Subjects, of the necessary corrective actions on the corporate areas and processes concerned by the report.

If, following the activity carried out, elements of manifest groundlessness of the report are found, it will be dismissed with adequate justification. Where, on the other hand, the report is found to be well-founded, it should be referred to the relevant internal bodies or external bodies/institutions, each according to their competences.

It is not the duty of the Reporting Committee to ascertain individual responsibilities, whatever their nature, nor to carry out legitimacy or merit checks on acts and measures adopted by corporate bodies or functions, on pain of encroaching on the competences of the persons in charge within the Company or of the judiciary.

Preliminary investigation activities relating to reported facts on which the existence of ongoing investigations by public authorities is known (e.g. judicial, ordinary and special authorities, administrative bodies and independent authorities, vested with supervisory and control functions) are subject to the assessment of the FNA Delegated Body, in order to verify the compatibility of the internal investigation with the investigation/inspection activities.

If, at the outcome of the preliminary investigation, it emerges that the facts under investigation may be significant from a disciplinary point of view or, in any case, where there are employment law profiles, or possible cases of criminal or civil liability emerge, or if it is found that a report has been made with malicious intent or serious misconduct, the conclusions of the preliminary investigation are sent to the FNA Delegated Body for assessments of competence.

The results of the preliminary investigation activities are communicated to the Administrative, Control and Supervisory Bodies of FNA for the appropriate assessments in line with the specific functions and prerogatives of the bodies themselves.

5.3.3. FEEDBACK TO THE REPORTING PERSON

At the end of the investigation, the Reporting Committee then provides feedback on the report, giving an account of the measures planned or taken or to be taken to follow up the report and the reasons for the choice made.

Pursuant to the applicable regulations, the Reporting Committee shall provide feedback on the report within three months from the date of the acknowledgement of receipt or, in the absence of such an acknowledgement, within three months from the expiry of the seven-day period from the submission of the report.

With reference to the acknowledgement to be made within the three-month period, it should be noted that the acknowledgement may consist of the announcement of the closure, the opening of an internal investigation and possibly its findings, the measures taken to deal with the issue raised, or referral to a competent authority for further investigation.

In this regard, the ANAC Guidelines specify that the same feedback, to be provided within three months, may also be merely interlocutory, since information may be provided on all the activities described above that are to be undertaken and on the progress of the investigation. In the latter case, once the preliminary investigation has been completed, the outcome should in any case be communicated to the reporting person.

5.3.4. MONITORING OF CORRECTIVE ACTIONS

It is the responsibility of the corporate Functions, entrusted with the corporate areas and processes concerned by the reports, to implement any recommendations and corrective actions (action plans) that may emerge upon conclusion of the internal checks and investigations carried out as part of the preliminary activity of the reports.

The FNA Delegated Body monitors the implementation of the recommendations and action plans, informing the Reports Committee and the Company's Administration and Control Bodies (for the issues within its competence).

The Reporting Committee archives the information received concerning the corrective actions in the dedicated web platform under the relevant report.

5.3.5. STORAGE OF DOCUMENTATION RELATING TO INTERNAL REPORTS

The information and any other personal data acquired are processed in accordance with Regulation 2016/679/EU.

In order to ensure the management and traceability of reports and consequent activities, the Reporting Committee prepares and updates all information concerning reports and ensures - using the My Whistleblowing platform and its functionalities - the preservation of the documentation for the time necessary to process the report and, in any case, for no longer than five years from the date of the communication of the final outcome of the reporting procedure.

When, at the request of the reporting person, the report is made orally during a meeting with the Reporting Committee, it is documented by the Reporting Committee either by recording it on a device suitable for storage and listening or by a report. In the case of minutes, the reporting person may verify, rectify and confirm the minutes of the meeting by signing them.

6. PROCEDURES FOR ADOPTING, DISSEMINATING AND UPDATING POLICY

This Policy is adopted by the FNA Delegated Body, which is also responsible for any subsequent updates that may be necessary.

This Policy is published in the "Responsibilities" section of the Company's website.

The dissemination of the Policy to all employees and collaborators of FNA is ensured.

The Policy is sent to the members of the Board of Directors, the Board of Auditors, the Supervisory Board and the Reporting Committee of FNA.