

WHISTLEBLOWING POLICY

drafted in accordance with Legislative Decree no. 24/23 (the ‘Whistleblowing Decree’)

The purpose of this Policy is to foster the collaboration of all employees, as well as all subjects working with Laviosa Chimica Mineraria S.p.A. (hereinafter, ‘**Laviosa**’ or the ‘**Company**’) in order to encourage the recognition of any illegal, immoral, unlawful or fraudulent conduct committed within the Company.

To this end, it is important that all employees, as well as all subjects working with Laviosa, can spontaneously turn to external members to the Company, in a completely confidential manner, even anonymously, in order to report actual or potential violations of national or European Union regulations, of which they have become aware in the context of their work.

In particular, the whistleblowing reports, which may be written or oral disclosure, may concern information on well-founded suspicions concerning conduct contrary to the Italian and/or the European Union regulations committed or that, on the basis of concrete elements, could be committed within the Company by any senior person, any employee or any person working with Laviosa, as well as concerning conduct aimed at concealing such violations and violations of the protocols provided for by the Organisation, Management and Control Model pursuant to Legislative Decree no. 231/01 (hereinafter referred to as the ‘**Model**’). Legislative Decree 231/01 (hereinafter, the ‘**Form**’), which the Company is adopting (hereinafter, the ‘**Whistleblowing**’).

All Laviosa's company staff and collaborators are committed to defining and actively participating in the correct functioning of the internal control system.

Laviosa is committed to promoting the awareness that controls exist and to the assumption of conscious and voluntary exercise of controls.

Mr. / Mrs. [-] is the external contact person (hereinafter, the ‘**Whistleblowing Contact person**’) for any internal reporting, as displayed below (hereinafter, the ‘**Internal Whistleblowing**’).

Any Reporting may also be made to the National Anti-Corruption Authority (hereinafter, the ‘**ANAC**’), using the dedicated channel, as further explained below (hereinafter, the ‘**External Whistleblowing**’).

INTERNAL REPORTS

With reference to the content, transmission, assessment, collection and storage of Internal Reports, also in the light of the provisions of the Whistleblowing Decree, the following provisions apply.

1. To whom the provisions are addressed

The following provisions apply to

- (a) the natural person making the Whistleblowing or Public Disclosure, as defined below (hereinafter, the ‘**Whistleblower**’);
- (b) the persons assisting the Whistleblower in the Whistleblowing process, operating within the same employment context or in the Public Disclosure, as defined below (hereinafter, the ‘**Facilitators**’);
- (c) persons in the same employment context as the Whistleblower and who are linked to the Whistleblower by a stable emotional or family relationship up to the fourth degree of kinship (hereinafter, the ‘**Whistleblower’s Family Members**’)
- (d) co-workers of the whistleblower who, working in the same work environment, have a regular and current relationship with the whistleblower (hereinafter, the ‘**Colleagues of the whistleblower**’); and
- (e) the entities owned by the whistleblower or by the person who has filed a complaint with the judicial or accounting authorities or who has made a Public Disclosure or for whom the same persons work, as well as the bodies operating in the same employment context as the aforementioned persons (hereinafter, the ‘**Whistleblower’s Related Parties**’).

Hereafter, the Whistleblower, the Facilitators, the Whistleblower’s Family Members, Colleagues of the whistleblower and the Whistleblower's Related Parties Reconnectable Entities are collectively referred to as the ‘**Whistleblower Party**’ or, individually, the ‘**Whistleblower Parties**’.

2. Content of Internal whistleblowing

Whistleblowing report may concern:

- (i) administrative, accounting, civil or criminal offences, which do not fall under the cases indicated in points (iii), (iv), (v) and (vi) below
- (ii) unlawful conduct relevant for the purposes of Legislative Decree 231/01 and conduct contrary to the protocols set out in the Form that the Company is adopting
- (iii) the specific offences, relating to the violation of national and European Union regulations, as listed in Annex I to the Whistleblowing Decree, which is attached hereto, i.e. the violation of national acts constituting the implementation of European Union acts, indicated in the Annex to Directive (EU) 2019/1937, although not indicated in Annex I, relating to the following sectors public procurement, services, products and financial 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 protection of personal data and security of networks and information systems;

(iv) 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 relevant secondary Union law;

(v) acts or omissions affecting the internal market, as referred to in Article 26, paragraph (2) of the Treaty on the Functioning of the European Union, including violations of Union competition and State aid rules as well as violations affecting 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

(vi) acts or conduct that frustrate the object or purpose of the provisions of Union acts in the areas referred to in (iii), (iv) and (v) above;

hereinafter collectively referred to as the '**Breaches**' or, individually, the '**Breach**'.

In particular, the Whistleblowers must indicate all facts known to them, with an indication of the circumstances of time and place in which the Breaches were committed and the manner in which they became aware of the Breach

Whistleblowing parties shall be entitled to indicate the following further elements:

- a) indication of any other persons who can report on the narration of facts;
- b) indication of any documents that may confirm the truthfulness of the facts reported; and
- c) indication of any private interests.

The following are, in any event, prohibited:

- (i) Reports characterised by the use of insulting expressions;
- (ii) Reports with a purely defamatory or libellous purpose;
- (iii) Reports that relate exclusively to aspects of private life, without any direct or indirect connection with the company's business.

Such prohibited whistleblowing Reports shall be considered even more serious when they refer to sexual, religious, political or philosophical habits and orientations.

3. Transmission mode and Management of the Internal Whistleblowing Reports

In order to facilitate Internal Whistleblowing Reporting, the Company has adopted the following dedicated information channel, which guarantees the confidentiality of the Whistleblowing Party as well as the content of the Whistleblowing Report and the relevant documentation:

Whistleblowing Platform: accessible from any device at the following link: [•].

The aforementioned Platform provides for the possibility of maintaining anonymity and allows the Whistleblower to make a written or even an oral Whistleblowing Report, through which it will also be possible to request a direct meeting with the Whistleblower, which will be set within a reasonable period of time.

The Whistleblowing Contact Person acts in such a way as to ensure the confidentiality of Internal Whistleblowing Reports, ensuring the confidentiality of the identity of the Whistleblower, of the person involved and of the person in any case mentioned in the Report, as well as of the content of the Report and of the relevant documentation, unless anonymity cannot be enforced by law (e.g. criminal investigations, inspections by control bodies, etc.).

The Whistleblowers' Contact Person and the Company guarantee the Whistleblowers in good faith against any form of retaliation, discrimination or penalisation or any detrimental consequence deriving from the Whistleblowing, ensuring the confidentiality of their identity, without prejudice to legal obligations and the protection of the rights of the Company or of third parties.

1. Collection of Internal Whistleblowing Reports

As part of the management of the Internal Whistleblowing Reporting channel, the Reporting contact must:

- a) issue the Whistleblower with a written acknowledgement of receipt of the Report, within 7 (seven) days from the date of actual receipt;
- b) make a preliminary analysis of the Whistleblowing Report (to check whether it is manifestly unfounded);
- c) maintain the interlocutions with the Whistleblower and, if necessary, request from the latter, also by means of a paper procedure through the acquisition of written remarks and documents, any possible additions;
- d) diligently follow up the Internal Whistleblowing Reports received, also by carrying out analyses and appropriate investigations, also by requesting any support from the internal structure (always guaranteeing the confidentiality of the Reporting Subject)
- e) provide feedback to Internal Whistleblowing Reports, also by drawing up an internal report, within 3 (three) months from the date of the acknowledgement of receipt or, failing such acknowledgement, within 3 (three) months from the expiry of the term of 7 (seven) days from the submission of the Internal Report
- f) keep and update a so-called Register of Whistleblowing Reports (on a confidential computer support), containing at least the following fields: (i) identification number and progressive number of the Whistleblowing Report; (ii) date of receipt of the Whistleblowing Report; (iii) channel through which the Whistleblowing Report was received; (iv) results

of the phase of verification of the validity of the Whistleblowing Report; and (v) date of commencement of the investigation (if any) and date of conclusion

(g) provide clear information on the dedicated channels, procedures and prerequisites for making Internal Whistleblowing Reports, as well as on the channel, procedures and prerequisites for making External Reports (discussed below).

5. Assessment of Internal Whistleblowing Reports

Once an Internal Whistleblowing Report has been received, the Reporting Contact shall analyse it, both formally and on its merits, and assess the appropriateness of any consequent action, listening, if necessary and possible, to the author of the facts that are the subject of the Whistleblowing Report and/or the person responsible for the alleged violation.

The result of the assessments, which must be formalised in writing, shall be communicated to the Board of Directors, for the adoption of any appropriate measures.

Clearly, in the event that the Reporting Officer deems the Report to be unfounded, he shall formalise in writing the related filing, notifying the Board of Directors and the Reporting Person.

6. Retention of Internal Reports

Internal Whistleblowing Reports and the relevant documentation are kept for the time necessary for the processing of the Report and, in any case, for no longer than 5 (five) years from the date of the communication of the final outcome of the procedure, relating to the Report, in compliance with the obligations of confidentiality on the identity of the Reporting Subject and on any other information from which such identity may be inferred, directly or indirectly.

7. Disciplinary System

Any conduct by a person who violates the measures for the protection of Whistleblowers, through the dedicated information channels, will be punished. The sanction will vary depending on whether the offender is an employee, a manager, a member of the Board of Directors or a member of the control body.

EXTERNAL WHISTELBLOWING REPORTS

1. Prerequisites for External Whistleblowing Reports

Any Report relating to unlawful conduct, relevant under the Whistleblowing Decree, may also be made using the ANAC IT platform (<https://servizi.anticorruzione.it/segnalazioni> - hereinafter, the 'ANAC Platform'), ruled by Articles 6 et seq. of the Whistleblowing Decree, which guarantees confidentiality to the Reporting Subject.

Alternative prerequisites to External Reporting are the following:

- (i) the channel for Internal Whistleblowing Reporting has not been properly activated or does not comply with the above;
- (ii) the Whistleblower has already made an Internal Report and this has not been followed up;
- (iii) the Whistleblower has reason to believe that, if he/she made an Internal Report, it would not be effectively followed up or that the Internal Report might give rise to the risk of retaliation;
- (iv) the Whistleblower has a well-founded reason to believe that the breach he or she wishes to report may constitute an imminent or obvious danger to the public interest.

The Whistleblowing Contact should ensure that clear information is made available to the Reporting Subjects on the prerequisites for making External Reports, as well as on the channel made available to ANAC and the relevant procedures.

2. Modalities for submitting External Reports

External Reports may be submitted in writing through the ANAC Platform or speaking through telephone lines or voice messaging systems or, at the request of the Reporting Subject, through a face-to-face meeting set within a reasonable period of time.

The External Whistleblowing Report, submitted to a subject other than ANAC, shall be transmitted to the latter, within 7 (seven) days from the date of its receipt, giving simultaneous notice of the transmission to the Reporting Subject.

3. Management of External Reporting

The ANAC - through specifically trained staff - after receiving an External Report shall

- a) provide any person concerned with information on the use of the ANAC Platform and of the Internal Reporting channel, as well as on the protection measures set out in the Whistleblowing Decree;
- b) give notice to the Whistleblower of receipt of the External Report within 7 (seven) days from the date of its receipt, unless explicitly requested otherwise by the Whistleblower or unless ANAC considers that such notice would undermine the protection of the confidentiality of the identity of the Whistleblower
- c) maintain the interlocutions with the Whistleblower and request from the latter, if necessary, also by means of a paper procedure through the acquisition of written remarks and documents, any additions;

- d) diligently follow up the External Whistleblowing Reports received;
- e) carry out the preliminary investigation necessary to follow up the Whistleblowing Report, also by means of hearings and acquisition of documents
- f) reply to the Whistleblower within 3 (three) months or, if there are justified and motivated reasons, 6 (six) months from the date of receipt of the External Report or, in the absence of said notice, from the expiry of 7 (seven) days from its receipt
- g) notify the Whistleblower of the final outcome, which may also consist in archiving or transmission to the competent Authorities or in a recommendation or administrative sanction.

ANAC may forward the Whistleblowing Reports, concerning information on breaches that do not fall within its competence, to the competent administrative or judicial Authority, including the institutions, bodies or organs of the European Union, simultaneously notifying the Whistleblower of the referral. The competent administrative authority must guarantee, also by using encryption tools, the confidentiality of the identity of the Whistleblower, of the person involved and of the person mentioned in the Whistleblowing Report, as well as the content of the Report and of the relevant documentation.

ANAC may forward the Whistleblowing Reports, concerning information on breaches that do not fall within its competence, to the competent administrative or judicial Authority, including the institutions, bodies or organs of the European Union, simultaneously notifying the Reporting Subject of the referral. The competent administrative Authority must guarantee, also by using encryption tools, the confidentiality of the identity of the Whistleblower, of the person involved and of the person mentioned in the Whistleblowing Report, as well as the content of the Report and of the relevant documentation.

WHISTELBLOWING AND CONFIDENTIALITY

Whistleblowing may not be used beyond what is necessary adequately to adequately follow them up.

The identity of the Whistleblower and any other information from which such identity may be inferred, directly or indirectly, cannot be disclosed, without the express consent of the Whistleblower himself/herself, to persons other than those competent to receive or follow up the Reports, who are expressly authorised to process such data.

As provided for in the *Whistleblowing Decree*: (i) in the context of criminal proceedings, the identity of the Whistleblower is covered by secrecy in the manner and within the limits provided for by Article 329 of the Code of Criminal Procedure. (ii) in the proceedings before the Court of Auditors, the identity of the Whistleblower cannot be disclosed until the end of the preliminary investigation phase; and (iii) in disciplinary proceedings, the identity of the Whistleblower cannot be disclosed, if the allegation of the disciplinary charge is based on investigations that are separate and additional to the Whistleblowing Report, even if consequent to it. If the accusation is based, in whole or in part, on the Whistleblowing Report and knowledge of the identity of the Whistleblower is essential for the accused's defence, the Whistleblowing Report will be usable for the purposes of the disciplinary proceedings only if the Whistleblower has given his/her express consent to reveal his/her identity.

The Whistleblower shall be informed, by written communication, of the reasons for the disclosure of the confidential data referred to in the preceding paragraph when the disclosure of the identity of the Whistleblower and of the Whistleblowing Report is also indispensable for the defence of the person concerned.

The reasons that induced the Whistleblower to report or denounce or publicly disclose are irrelevant, for the purposes of his/her protection.

When the criminal liability of the Whistleblower 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 ascertained, even by a judgment of first instance, the confidentiality protections provided therein are not guaranteed and the Whistleblower may be subject to disciplinary sanctions.

PUBLIC DISCLOSURES

The Reporting Subject may disclose information on the Violations in the public domain through the press or electronic media or, in any case, through means of dissemination capable of reaching a large number of people (hereinafter, the 'Public Disclosure'), if the following conditions are met

- a) the Reporting Subject must have previously made an Internal and an External Report, or made an External Report directly, as provided for above, without having received a reply within the terms provided for above
- b) the Reporting Subject must have reasonable grounds to believe that the Breach may constitute an imminent or obvious danger to the public interest;
- c) the Whistleblower must have well-founded reason to believe that the External Report may entail the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those in which evidence may be concealed or destroyed, or in which there is a well-founded fear that the recipient of the Report may be in collusion with the author of the Breach or involved in the Breach itself.

The rules on professional secrecy of journalists, with reference to the source of the information, remain unaffected.

PROHIBITION OF RETALIATION

The Company guarantees the Whistleblowers against any kind of retaliation, with reference to Whistleblowing or Public Disclosure.

A Retaliation is any behaviour, act or omission, even only attempted or threatened, carried out on account of the whistleblowing Report, of the report filed to the Judicial or Accounting Authorities or of the Public Disclosure, and which causes or may cause to the whistleblower or to the person who filed the Report, directly or indirectly, an unjust damage;

Examples of Retaliation are:

- a. dismissal, suspension or equivalent measures;
- b. downgrading or non-promotion;
- c. change of duties, change of place of work, reduction of salary, and change of working hours;
- d. suspension of training or any restriction on access to it;
- e. negative merit notes or references;
- f. the adoption of disciplinary measures or any other sanction, including a fine;
- g. coercion, intimidation, harassment or ostracism;
- h. discrimination or otherwise unfavourable treatment;
- i. the non-conversion of a fixed-term employment contract into an employment contract of indefinite duration, where the employee had a legitimate expectation of such conversion
- j. the non-renewal or early termination of a fixed-term employment contract
- k. 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;
- l. inclusion on improper lists on the basis of a formal or informal sector or industry agreement, which may result in the person being unable to find employment in the sector in which the Company operates;
- m. the early termination or cancellation of existing contractual relationships;
- n. the cancellation of a licence or permit;
- o. the request to undergo psychiatric or medical examinations.

Whistleblowers may communicate the retaliation they believe they have suffered to ANAC, which informs the National Labour Inspectorate, for the measures within its competence.

Retaliatory acts applied to the Whistleblowers are null and void. In case of dismissal, the Whistleblowers are entitled to be reinstated in their jobs. The judicial authorities may take all the measures, including provisional ones, necessary to ensure the protection of the subjective legal situation being asserted, including compensation for damages, reinstatement in the workplace, an order to cease retaliation, and a declaration of the nullity of retaliatory acts.

PROTECTION OF PERSONAL DATA

The personal data of the Whistleblowers, the reported persons and the persons involved in the Whistleblowing are processed in accordance with the applicable data protection legislation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016).

In particular, it is highlighted in this context that:

- the Whistleblowers may receive, at the time of Internal Whistleblowing, an information notice specifying, *inter alia*, the purposes and methods of the processing of his or her personal data, the bodies and persons to whom the reported data may be transmitted in the context of the management of the Internal whistleblowing and the rights of the whistleblower with reference to his or her personal data processed;
- the whistleblowing system provides for the processing only of personal data that are strictly necessary and relevant to the purposes for which they are collected;
- adequate technical and organisational measures are in place to guarantee the security of personal data, in accordance with current legislation.

TERM AND VALIDITY OF THE POLICY

This *Policy* supersedes and replace all prior versions that may have been issued on the subject and it is immediately and indefinitely in force, without prejudice to any subsequent amendments and additions.