

## WHISTLEBLOWING PROCEDURE NOTICE

Forgital Italy S.p.A. and their subsidiaries, aware of the importance of integrating the reporting channels, in order to protect the integrity of the company and to ensure compliance with the principles of legality, fairness and transparency, also vis-à-vis third parties, in the performance of its Corporate and Group activities, has established appropriate corporate reporting channels in accordance with Legislative Decree No. 24/2023, implementing EU Directive 2019/1937.

With this Notice, the Company aims to broadly disseminate all useful information to all Recipients regarding the channels, procedures, and conditions for making both internal and external reports.

### WHO CAN REPORT

This procedure applies, in subjective terms, to Relevant Reporting made by the following persons:

- persons having the status of **worker**;
- **self-employed workers and collaborators** working at the company;
- **freelancers and consultants** working at the company;
- **volunteers and trainees**, paid and unpaid, who work at the company;
- **shareholders** and persons with **administration, management, control, supervision or representation functions**, even if such functions are exercised on a de facto basis, at the Company.

### CONDUCT THAT MAY BE REPORTED

Relevant Reporting are reports of conduct, acts or omissions detrimental to the public interest or the integrity of the Company, which have come to the whistleblower's attention in the course of his or her work, and which consist of:

- **unlawful conduct** such as, by way of example: corrupt conduct towards the Public Administration, violations of Occupational Health and Safety regulations, violations of Environmental regulations, etc. (for Italian legislation relevant to Legislative Decree No. 231/2001 and breaches of the 231 Model). Please note that such reporting can only be made through the internal reporting channels;
- **offences** falling within the scope of European Union acts in the **following areas**: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and animal feed safety, animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems.
- acts and omissions affecting the **financial interests of the European Union**;
- acts and omissions relating to the **internal market**, including breaches of EU competition and state aid rules and corporate tax law;
- acts and omissions that defeat the object or purpose of the provisions referred to in the acts of the European Union in the aforementioned areas;
- Violations of the principles contained in Forgital Group Code of Ethics.

Objections, claims or requests relating to a personal interest of the whistleblower and relating exclusively to his or her individual employment relationship or to his or her employment relationship with a superior are **excluded** from the scope of Relevant Reporting.

Are also excluded, **unsubstantiated news**, all information already in the public domain, or any kind of information acquired based on unreliable **rumors**.

## CHARACTERISTICS OF THE REPORTING

The reporting must be as **circumstantial** as possible to allow reconstruction of the facts and determination of the merits of what has been reported, in order to allow adequate verification activities. Specifically, the following must be reported:

- the details of when and where the fact subject to reporting occurred;
- a description of the fact;
- the personal particulars or other information that make it possible to identify the person responsible for the reported fact;
- any annex;
- any persons potentially aware of the facts.

It is necessary for the Reporting Party to specify that the report is made in accordance with the current legislation (Whistleblowing Law).

Anonymous Relevant Reporting will also be handled by the Channel Manager where applicable. If the anonymous whistleblower is subsequently identified, the same shall nonetheless qualify for the protection against retaliation.

## CORPORATE INTERNAL REPORTING CHANNELS

In order to enable the transmission of Relevant Reports, the company shall, after consultation with the trade union representatives, activate and keep open the following reporting channels:

- Software channel: my Governance software** by the **My Whistleblowing add-on**  
<https://private.mygovernance.it/mywhistleblowing/forgital/14809>
- Telephone channel:** a telephone line to the numbers with the forwarding to the Channel Manager; in order to ensure confidentiality, the reporting agent must communicate that he intends to make a Whistleblowing Report:
  - +39 0445 731 313 for Forgital Italy S.p.A.
  - +39 0445 318 511 or +39 02 61543911 for RTM Breda Srl
  - +39 0461 775 711 for Fly S.p.A
  - +33 (0) 327 697 373 for Forgital Dembiermont
  - +33 (0) 477 405 370 for Forgital FMDL
  - +1 713 943 7059 for Forgital USA
- Traditional channel:** one or more physical complaint boxes, specifically located in the plant and clearly identified. Boxes shall be located in areas without surveillance or video surveillance. For traditional Channels, in order to ensure confidentiality, the communication must be sent by the reporting agent in a sealed envelope with explicit indication on the envelope "Whistleblowing Reporting".

Where the reporting agent requests a **direct meeting**, it shall be determined by the Channel Manager within a reasonable time and in a manner that maintains confidentiality.

The management of the reporting channel is entrusted to an **Ethics Commission**, consisting of three members: Valentina Busin, Chantal Pagnutti and Sabrina Apicella (the 'Channel Manager').

For the proper handling of the report, internal or external parties who do not have a conflict of interest may be involved and will still be bound by the confidentiality obligations provided by the law.

## MANAGEMENT OF THE REPORT

The Reporting channel Manager is responsible for:

- providing the whistleblower with **acknowledgement of receipt** of the report within **seven days** from the date of receipt;

- maintaining the **dialogue** with the whistleblower and requesting **integrations** from the latter if necessary;
- diligently **following up** the reports received by activating the persons responsible for handling the report (e.g. the SB for reports on 231);
- providing **feedback** on the reporting within **three months** of the date of the acknowledgement of receipt or, in the absence of such an acknowledgement, within three months of the expiry of the seven-day period following the submission of the report. Such feedback may also be of an interim nature, if the investigation has not yet been completed. In this case, after the investigation, the results will be communicated to the reporting person.

## PRIVACY

Data will be processed in accordance with GDPR No. 679/2016 and Legislative Decree No. 24/2023. See **Privacy Whistleblowing document**.

## PROHIBITION OF RETALIATION

No retaliatory measure, understood as any conduct, act or omission, even if only attempted or threatened, taken as a result of a reporting, which causes or is likely to cause, directly or indirectly, unjustified detriment to the whistleblower, shall be taken against the protected person.

Anyone who adopts retaliatory or discriminatory actions against the whistleblower is subject to disciplinary sanctions in compliance with the applicable regulations.