



WHISTLEBLOWING MANAGEMENT



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SALT p.A. (hereinafter "SALT" or "the Company") has regulated, in accordance with current legislation (D. Lgs. n. 24 of 10 March 2023 implementing EU Directive 2019/1937), the process of receiving, analysing and managing Reports sent or transmitted by anyone, including anonymously, concerning facts and/or conduct potentially subject to Reports.

The Whistleblower (for example: the SALT Entities, as well as all those who, for various reasons, have collaboration or business relationships with the Company, including collaborators, temporary workers, consultants, agents, intermediaries, suppliers, in relation to the provision of work, collaboration or business with the Company) who makes the Report or the public disclosure of information on violations acquired in the context of their work must know that the Recipient of the same is the Head of the Internal Audit Function or, if the Report concerns the latter, the Chairman of the Company's Supervisory Body.

Reports may not relate to:

- a) disputes, claims or requests related to a personal interest of the Whistleblower or of the person who has filed a complaint with the judicial or accounting authority that relate exclusively to their individual employment relationships, or inherent to their employment relationships;
- b) reports of infringements that are already compulsorily covered by European Union or national acts on financial services, products and markets and the prevention of money laundering and terrorist financing, transport security and environmental protection, or by national acts implementing European Union acts set out in Part II of the Annex to Directive (EU) 2019/1937;
- c) reports of breaches in the field of national security, as well as of procurement relating to defence or national security aspects, unless such aspects fall within the relevant secondary legislation of the European Union.

It is expressly forbidden to:

- make Reports that are manifestly opportunistic and/or made for the sole purpose of harming the reported person or other subjects;
- make Reports that the results of the investigation phase reveal that there is no factual evidence and made in full knowledge of the non-existence of a violation or non-compliance.

The Report can be made in the following alternative ways:

- in written or oral form through the Digital Platform accessible at the Company's address;
- by ordinary or registered mail, confidential and personal, addressed to the Recipient;
- orally, by meeting with the Recipient.

SALT Entity that receives a Report outside the aforementioned channels must send it without delay and, in any case, within seven days of its receipt, in original with any attachments, to the Recipient, giving simultaneous notice to the Whistleblower (only in the case of a non-anonymous Report), in compliance with criteria of maximum confidentiality and suitable to protect the Whistleblower and the identity and integrity of the reported subjects, without prejudice to the effectiveness of subsequent investigation activities.

Subject to certain conditions, the Decree provides that the Report may be made (i) through an external channel established and managed by ANAC - National Anti-Corruption Authority, (ii) by public disclosure or (iii) by complaint to the judicial or accounting authority.

Operating Instructions for Internal Reporting via Digital Platform

The Digital Platform is equipped with security measures such as to guarantee, also through encryption tools, the confidentiality of the identity of the Reporter, of the people involved and in any case mentioned in the Report, as well



as the content of the same and the related documentation. The Report can be made in written form or via voice messaging with the methods indicated on the Digital Platform. When sending the Report, the Digital Platform automatically generates a "user-id" and allows the Reporter to define a password. Using these credentials, the Reporter can constantly have access to the Report made and check its status and outcome, also being able to communicate with the Recipient even if he has decided to remain anonymous. If the voice messaging system is used for the Report, the Report, with the consent of the Reporter, is documented by the Recipient by recording on a device suitable for storage and listening or by full transcription. In case of transcription, the Reporter can verify the content of the transcription which will be available for consultation on the Digital Platform.

Operating Instructions for Internal Reporting by Ordinary or Registered Mail

The Report is made by ordinary or registered mail, confidential and personal, addressed to the Internal Audit Manager or to the President of the Supervisory Body if the Internal Audit Manager is the subject of the Report itself (the "Recipient") to the following address: SALT p.A., Via Don Enrico Tazzoli 9 – 55041 Lido di Camaiore (LU).

Operating Instructions for Internal Reporting through a meeting with the Recipient

The Report is made through a direct meeting with the Recipient set by the latter within a reasonable time from the date of the Reporter's request. In the event that the Recipient uses a voice recording system for the Report, the Report will be documented in writing through a detailed report of the conversation by the Recipient. The Reporter can verify, rectify and confirm the contents of the transcript by signing.

Having received the Report using one of the aforementioned methods, the Recipient issues the Reporter with acknowledgment of receipt of the Report within seven days of the date of receipt. Within three months from the date of the acknowledgment of receipt, the Recipient provides feedback to the Report. If the Report is excessively generic or incomplete, the Recipient contacts the Reporter to ask for further elements useful for the preliminary evaluation.

The investigation into the Report has the objective of proceeding, within the limits of the tools available to the Recipient, with specific investigations, analyzes and evaluations regarding the reasonable basis of the factual circumstances reported, as well as reconstructing, on the basis of the documentation and official information and of those made available, the management and decision-making processes followed. The merit of management decisions or opportunities, whether discretionary or technical-discretionary, made from time to time by the company structures/positions involved, does not fall within the scope of analysis of the investigation, except within the limits of manifest unreasonableness. The Recipient carries out the investigation also by acquiring the necessary information from the structures involved, involving the competent company functions and making use, if deemed appropriate, of external consultants.

If the Violation or illegitimate behavior reported, as the case may be, leads to a positive outcome, based on the respective competences, the most appropriate and appropriate initiatives will be taken in consideration of the seriousness of the Violation and in compliance with the applicable law.

SALT does not tolerate any retaliatory consequences towards the Reporter and the Facilitators in a disciplinary context, prohibiting the adoption of any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report, the report to the judicial authority or accounting or public disclosure and which causes or may cause the reporting person or the person who made the complaint, directly or indirectly, unfair damage.

If suspected discrimination or retaliation against the Reporter occurs, connected to the Report, or abuse of the reporting tool by the Reporter, SALT may apply disciplinary sanctions. However, this protection does not apply in cases where the Report contains false information made with intent or gross negligence.

The Company guarantees the confidentiality of the Reporting subject and of the subject involved and of the subject mentioned in the Report, as well as of the data / information transmitted, in order to guarantee the Reporting party from any form of retaliation or discrimination. The Company also guarantees the same protection to the people mentioned in the Report, to the Facilitators, to the people who work and who have a habitual and current relationship with said person in the same working context as the Reporter and to those who are linked to the latter by a stable relationship emotional or kinship within the fourth degree and operate in the same working context as the Reporter. All subjects involved in this Procedure are required to maintain such confidentiality or anonymity of the Reporter and



the subjects involved.

All Reports, regardless of the method of receipt, are archived by the Recipient. The Reports and the related documentation are 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 Report procedure.