PROCEDURE FOR THE MANAGEMENT OF WHISTLEBLOWING REPORTS

Foreword

GreenGo S.r.l. (hereinafter also referred to as "the Company" or "GreenGo") has adopted and effectively implemented an Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001 and, with this "**Procedure for the management of *Whistleblowing* Reports**" (hereinafter also referred to as the "**Procedure**"), intends to regulate the use of the reporting channels activated in compliance with the provisions of Legislative Decree no. 24/2023, concerning the protection of persons who report violations of Union law and regulatory provisions
national.

DEFINITIONS

For the purposes of this Procedure, the following definitions and abbreviations apply:

- **ANAC**: National Anti-Corruption Authority.
- **Code of** Ethics: the Code of Ethics adopted by GreenGo S.r.l.
- **Work context**: the work or professional activities, present or past, through which, regardless of the nature of such activities, a person acquires information about violations and in the context of which he/she might suffer retaliation in the event of reporting.
- **Addressees** (of the Procedure): all the persons who, directly or indirectly, are involved in the process of receiving and handling Reports, as outlined in this Procedure (e.g. Whistleblower, Facilitator, Whistleblower, etc.).
- **Legislative Decree** No. 231/2001: Legislative Decree No. 231 of 8 June 2001, containing '*Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of* Law *No. 300 of 29 September 2000'*.
- **Legislative Decree** No. 24/2023: Legislative Decree No. 24 of 10 March 2023 on the '*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national laws'* (so-called *whistleblowing*).
- **Facilitator**: a natural person who assists the reporting person in the reporting process.
- **Reporting Manager**: the entity in charge of receiving the Report and managing it in accordance with the regulations in force.
- **Model 231**: the Organisation, Management and Control Model adopted by GreenGo S.r.l. pursuant to Legislative Decree 231/2001.
- **Acknowledgement**: the communication by which the Manager shares information with the Reporting Party concerning the follow-up that is being given or is intended to be given to the Report.
- **Retaliation**: any conduct, whether active or omissive, even if only attempted or threatened, carried out by reason of the Whistleblowing and which causes or may cause the Whistleblower unjust damage.
- **Whistleblower**: the natural person (e.g.: worker, supplier, collaborator, professional, client) who makes the Report of the violation found within GreenGo's work context and who must be guaranteed its confidentiality as well as any retaliatory behaviour.
- **Reported** person: the person (e.g. worker, supplier, collaborator, professional, customer) to whom, in the Report, the violation is attributed or who is implicated in it.
- **Follow-up**: the activity carried out by the Manager to assess the existence of the reported facts, the outcome of the investigation and any measures taken.

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1. FOREWORD

GreenGo, in the pursuit of its *business* objectives, has always been sensitive to the need to ensure conditions of fairness and transparency in the conduct of corporate activities and is committed to combating unlawful conduct, both through the dissemination and promotion of ethical values and principles, and through the effective implementation of rules of conduct and control processes, in line with the requirements of applicable regulations and best practices.
For this reason, the Company has formalised its Model 231 and adopted a Code of Ethics, which is an integral part of the former.

In order to strengthen its organisational and good governance system (as well as to fulfil the regulatory obligations specifically in force on the subject), GreenGo promotes and encourages the reporting of offences and/or facts (as defined in section 4 below), even if only potentially contrary to the law and internal company regulations, by anyone who, in the course of their work at the Company, has knowledge of them.

The purpose of this Procedure is, therefore, to regulate the process of receiving and handling Reports received through the channels indicated below, as well as to define the safeguards and protective measures put in place for the protection of Whistleblowers and Reported Persons.
In accordance with the provisions of Legislative Decree 24/2023, the internal reporting channels described in the Procedure as well as their operating methods were communicated to the trade unions.

2. LEGAL AND REGULATORY REFERENCES

The main legal and regulatory references followed in drafting this Procedure are:

- Royal Decree No. 1938 of 19 October 1930 - Criminal Code;
- Presidential Decree No 447 of 22 September 1998 - Code of Criminal Procedure;
- Legislative Decree No. 231 of 8 June 2001 '*Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of the Law of 29 September 2000,*
  No. 300' of 08/06/2011 as amended and supplemented;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, '*General Data Protection Regulation*';
- Legislative Decree no. 196 of 30 June 2003 '*Personal Data Protection Code*' and subsequent amendments and/or supplements;
- Legislative Decree No. 24 of 10 March 2023 '*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, which last regulated the protection of persons who report breaches of Union law*';
- "*Guidelines on the Protection of Persons Reporting Violations of Union Law and Protection of Persons Reporting Violations of National Law Provisions. Procedures for the submission and management of External Reports*", approved by ANAC with Resolution No. 311 of 12 July 2023;
- "*Operational Guide for Private Entities*" regarding the new '*Whistleblowing'* discipline, published by Confindustria on 27 October 2023.

3. OBJECTIVE SCOPE

Depending on their subject matter, Reports can be of two types: '*Whistleblowing Reports*' and 'Ordinary Reports'.

Whistleblowing

Whistleblowing Reports are exclusively those concerning:

1. unlawful conduct relevant under Legislative Decree No. 231/2001;
2. violations of the Organisation, Management and Control Model adopted by the Company pursuant to Legislative Decree No. 231/2001.

Such Reports must relate to conduct, acts or omissions of which the Reporting Party has become aware in the context of GreenGo S.r.l.'s working environment.

Whistleblowing Reports may also concern violations not yet committed but which, on the basis of concrete elements, could be committed within the Company, as well as conduct aimed at concealing such violations (committed or not yet committed).

The *Whistleblowing* Report may not, however, concern situations of a personal nature of the Whistleblower relating to grievances or claims/complaints concerning relations with hierarchical superiors or colleagues.

Ordinary Reports

Ordinary Reports are Reports that do not fall within the scope of *Whistleblowing Reports* in terms of objective or subjective scope, i.e., Reports concerning matters other than those listed above or received from persons other than those indicated in paragraph 5 of this Procedure.
Ordinary Reports shall also be handled by protecting the confidentiality of the identity of the reporter in compliance with the provisions specifically adopted on the subject by the Company, including by this Procedure.

Regardless of whether *whistleblowing* or ordinary *whistleblowing* is involved, Reports may not concern information that is manifestly unfounded, information that is already fully in the public domain, or information acquired only on the basis of indiscretions or rumours that are not very reliable (so-called "rumours").

Anonymous reporting

Lastly, Reports may be 'anonymous', i.e. they do not contain elements from which the identity of the reporter can be deduced.
In order to promote widespread use of the established channels, GreenGo accepts Anonymous Reports - provided they are substantiated and do not have a mere defamatory intent - and handles them as Ordinary Reports.

With respect to Anonymous Reports, therefore, the guarantees and protections provided for *Whistleblowing* Reports do not apply, except where the Whistleblower i) is subsequently

identified, (ii) suffers retaliation and (iii) the Report falls within the objective and subjective scope outlined in this Procedure.

4. SUBJECTIVE SCOPE: THE SUBJECTS PROTECTED

The persons who can make Reports and benefit from the protections provided for under Legislative Decree 24/2023 are:

- top management and members of corporate bodies with functions of administration, management, control, supervision or representation, even where such functions are exercised on a de facto basis;
- all employees, fixed-term and permanent;
- all those who, in various capacities, have working relationships, including self-employment, with GreenGo, including: shareholders, volunteers and trainees (paid and unpaid), employees, freelancers and consultants, agents (e.g. *Regional Representatives*), intermediaries, suppliers and business *partners;*
- workers or collaborators providing goods or services or carrying out works for third parties at GreenGo.

The protections provided for by Legislative Decree 24/2023 also apply if the Report occurs during an employee's application process or in other pre-contractual stages or during the probationary period, as well as after the termination of the contractual relationship, if the information on the breaches was acquired during the course of the same legal relationship.

Additional persons to whom the protection measures of the Reporting Officer may be extended are:

- facilitators;
- persons in the same work environment as the reporting person who are linked to him/her by a stable emotional or family relationship up to the fourth degree;
- the Reporting Officer's work colleagues who work in the same work environment and have a regular and current relationship with him/her;
- entities owned by or for which the reporting person works, as well as entities operating in the same work environment as the reporting person.

5. REPORTING MANAGER

The receipt and management of Reports are entrusted to a professional external to the Company, who is autonomous, independent and endowed with specific expertise in the management of channels and Reports, in compliance with the provisions of Legislative Decree 24/2023, the Guidelines issued by ANAC and the "*Operational Guide for Private Entities*" published by Confindustria.
This person was identified as the lawyer Antonio Bonfiglioli, formerly the monocratic Supervisory Board pursuant to Legislative Decree 231/2001 of GreenGo S.r.l..
The Reporting Manager has been formally instructed, in accordance with Articles 29 EU Reg. 679/2016 and 2-
quaterdecies of Legislative Decree No. 196/2003, as the subject in charge of data processing.
The deed of assignment provides specific instructions for the correct processing of personal data relating to the Report, of which the Company is the Data Controller pursuant to Article 4(1) no. 7) Reg. (EU) 679/2016.

6. SIGNALLING CHARACTERISTICS

For a more effective handling of the Report by the Manager, it should be detailed and contain - where possible - the following elements:

- the identity of the reporter;
- a clear and complete description of the facts that are the subject of the Report;
- the circumstances of time and place in which the event that is the subject of the Report occurred;
- the identification of the relationship between the Whistleblower and the Company;
- personal details or other elements enabling the person(s) to whom the reported facts are attributed to be identified;
- an indication that it is a *Whistleblowing* Report for which you intend to keep your identity confidential and benefit from the safeguards provided for in the event of any retaliation;
- an indication of any other persons who may report on the facts being reported;
- any other information that may provide useful feedback on the existence of the reported facts.

In this perspective, it is advisable that the Reports provide as many elements as possible, in order to allow the Manager to carry out the necessary verifications.
It is also advisable for the Whistleblower to attach any useful information and/or document relevant to the analysis and subsequent assessment of the facts that are the subject of the Report.

7. INTERNAL REPORTING CHANNELS

GreenGo, in order to pursue the objective stated in section 1 above and in compliance with the provisions of the industry regulations, has set up two internal reporting channels.

The channels activated, alternatively, are:

1) Channel in written form: *www.greengo.eticainsieme.it*

A dedicated platform has been set up for written *Whistleblowing* Reports, accessible from any *browser* (including mobile devices) at the following address:

www.greengo.eticainsieme.it

The instrument offers the broadest guarantees of confidentiality for the reporter.
Specifically, in order to send the Report, the Reporting Party must fill in - using the special menu - the questionnaire available on the Platform, which is characterised by open and closed questions aimed at identifying the information referred to in paragraph 6, which will allow the Manager to examine the subject of the Report in greater detail. The platform also allows the *upload of* the documentation that the Reporting Party deems appropriate to bring to the attention of the Manager in support of its Report.

Upon receipt of the Report, the Platform automatically generates a receipt confirming the receipt of the Report and provides a 16-digit alphanumeric code, through which the Reporting Party can access the Platform to i) monitor the process of handling the Report, ii) check any

requests for clarifications and/or additions; iii) to provide further details or news of which it has become aware;
(iv) have direct contact with the Manager.
Loss of the code has no effect on the Report, which will still be processed at the times and in the ways laid down in this Procedure, but its availability is essential in order to be able to access one's Report at any time. Without it, such an operation will not be possible and, for confidentiality reasons, the code related to each Report cannot be retrieved in any way. If you feel it is appropriate to provide new information that has come to your attention or to be aware of the outcome of the investigation, you may still open a new Report.

2) Oral channel: *cell. + 39 331 2277 487.*

For oral reports, on the other hand, a special telephone number has been set up through which an appointment can be made with the manager.
Appointment requests will be received during the following time slots: 9 a.m. to 6.30 p.m., Monday to Friday.

During the phone call, the reporting party shall indicate:

1. one's own contact details, taking care not to specify one's own name or to communicate a contact attributable to one's role in the company (e.g. e-mail address with company domain);
2. the wish to meet the Manager in person or to contact him by telephone or video call.

During the phone call, dedicated staff will arrange an appointment with the reporting manager within seven days of the first contact.
The Manager will enter the content of the Report in the Platform and will communicate to the Reporting Party the alphanumeric code to access the Reserved Area of the Platform. In the case of an in-person meeting, on the other hand, the Report, subject to the consent of the reporting person, may be collected and recorded in a document verified and signed by the reporting person and/or recorded on a device suitable for storage and listening.

Reports received from non-competent parties

In the event that a *Whistleblowing* Report is sent through channels other than those described above, is received by a person other than the Manager and, in the same, it is specified that he/she wishes to benefit from the *whistleblowing* protections, or where such a wish can be inferred from the report itself, the onus is on the recipient:

i) treat the information of which it has become aware in such a way as to ensure its full confidentiality;
ii) contact the Manager in order to receive instructions on how to transmit the erroneously received Report;
iii) transmit the Report to the Manager, without delay, and in any case within 7 (seven) days;
iv) after informing the Manager, delete the Alert from its devices;
v) in the event of a Report of Retaliation, contact ANAC - through the channels and in the manner provided by that body on its website **https://www.anticorruzione.it/-/whistleblowing - in** order to receive instructions on how to transmit the Report wrongly received.

8. REPORTING MANAGEMENT

Within 7 (seven) days of receipt of the Report, the Manager sends an acknowledgement of receipt of the Report to the Reporting Player, using the channel of receipt of the Report.
In the case of oral reports (meeting request and/or use of telephone line), the time of receipt of the report is deemed to be the time of signing the minutes and/or the time of completion of the recording. If both recording and verbalisation are used for the recording of the oral report, with the consent of the reporting party, the time of receipt of the report is deemed to be the time of signing the minutes.

The Manager - taking care to adopt all necessary precautions to ensure maximum confidentiality - then classifies the Report as "*Whistleblowing*" or "Ordinary".

With regard to *Whistleblowing* Reports, the Manager verifies that there is sufficient evidence to assess their validity. Should the Whistleblowing Report turn out to be insufficiently detailed, the Whistleblowing Manager formulates appropriate requests for additions/clarifications to the Whistleblower.

In accordance with Article 5 of Legislative Decree 24/2023, within 90 days from the date of acknowledgement of receipt or, in the absence of such notice, within 90 days from the expiry of the period of 7 days from the submission of the Report, the Manager shall provide feedback - even interlocutory - to the Reporting Party, without prejudice to confidentiality obligations.

For instruction purposes, the Manager may:

- talk, also directly, with the Whistleblower and with any other person who may be able to provide a contribution to the ascertainment of the facts, taking care to adopt all precautions to ensure the utmost confidentiality;
- acquiring documents, including from third parties, and making accesses to the Company's premises;
- entrusting in-depth investigations to internal offices and/or to third parties, taking care to omit any information that may, even indirectly, lead back to the identity of the reporter and of the reported person, where not strictly necessary for the proper performance of the entrusted task.

The corporate bodies and/or the corporate functions involved in the "investigation plan" must guarantee full cooperation to the Reporting Manager to the extent necessary to carry out the investigation, in compliance with the principles and guarantees set out in this Procedure.

In cases where, for investigative reasons, it is necessary to make other persons aware of the content of the Report and/or of the documents enclosed with it, the Manager shall ensure that the personal data of the Reporting Party, as well as of the other persons whose identity is to be kept confidential (such as the Facilitator, the Reported Person and the other persons mentioned in the Report), are obscured.

Once the investigation has been completed, the Manager communicates its results to the Reporting Officer via the same channel.

9. CLOSURE OF SIGNALLING

At the end of the investigation, the Manager draws up a report:

- the activities carried out;
- the results thereof, as well as the results of any previous investigations carried out on the same and/or similar facts to those referred to in the Report;
- a judgement as to whether or not the reported facts are reasonably justified, with any indications as to the adoption of necessary corrective actions on the areas and business processes that may be affected by the Report.

In particular, the Report may certify the dismissal of the Report on the grounds of insufficient evidence of the facts reported or of the irrelevance of the facts themselves, and may suggest changes to the 231 Model and/or the Code of Ethics or other internal procedures, to initiate disciplinary or sanctioning proceedings - in accordance with the provisions of the disciplinary and sanctioning system in force - against the persons reported and acknowledged to have committed a violation, offence or irregularity, as well as against the Whistleblowers who have made unfounded Reports, based on untrue factual circumstances and made with wilful misconduct or gross negligence.

The Reporting Manager monitors the effective adoption of the corrective measures proposed in relation to the Reports received.

10. RECORD KEEPING

In accordance with the provisions of the regulations in force, the Report and the related documentation will be kept for the time strictly necessary for its management and, in any case, no longer than five years from the closure of the management process.
The original media of the Reports received through the hearing request and/or other modalities are stored by the Manager in the dedicated Platform.

11. PROTECTIONS FOR WHISTLEBLOWERS AND REPORTED PERSONS

Protections of the reporter

Protection from retaliation and discrimination

GreenGo undertakes to guarantee protection against any act of retaliation, discrimination or penalisation, whether direct or indirect, against the Whistleblower for reasons related, directly or indirectly, to the Whistleblowing.
It is strictly forbidden to retaliate or discriminate, directly or indirectly, against the whistleblower for reasons directly or indirectly linked to the report.
The burden of proving that such conduct or acts are motivated by reasons unrelated to the Report lies with the person who carried them out.
In the event of retaliation/discrimination, whistleblowers may report the retaliation they believe they have suffered not only to the judicial or administrative authorities, but also to ANAC, which will inform the National Labour Inspectorate for the measures within its competence.

Protection of confidentiality

In accordance with the regulations in force, GreenGo undertakes to guarantee the confidentiality of the reporter and the reported person, as well as of the Report.

The identity of the reporter and any other information from which that identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporter, to persons other than the Manager.
If, for investigative reasons, it is necessary to make other persons aware of the content of the Report and/or of the documents annexed to it, the Manager is obliged to obscure the personal data of the Reporting Party, as well as of the other persons whose identity is to be kept confidential (such as the Facilitator, the Reported Person, the other persons mentioned in the Report).
In any event, the identity of the reporter and any other information from which that identity may be inferred, directly or indirectly, will not be disclosed to third parties other than the Manager without the reporter's consent, except in the exceptional cases detailed below:

- within the framework of the proceedings before the Court of Auditors, the identity of the reporter may be revealed after the investigation phase is closed;
- within the framework of criminal proceedings, the identity of the reporter is covered by secrecy pursuant to Article 329 of the Code of Criminal Procedure and is therefore subject to the relevant code provisions.

Within the framework of 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, even if consequent to it.
If the charge is based, in whole or in part, on the Report, and knowledge of the identity of the Whistleblower is indispensable for the accused's defence, the Report will be usable for the purposes of the disciplinary proceedings only if the Whistleblower gives his/her express consent to the disclosure of his/her identity and if he/she is informed in writing of the reasons for the disclosure.

Limitations of liability
In accordance with the rules in force, the Whistleblower is also protected by certain causes of limitation of liability with respect to the disclosure and dissemination of certain categories of information.
This special type of protection operates only under two conditions:

- at the time of disclosure, the Whistleblower had reasonable grounds to believe that the information disclosed was necessary to bring the breach to light. Protection does not apply when information is disclosed that is superfluous, disclosed only for '*gossip'*, vindictive or opportunistic purposes;
- the Report was made in the belief that the information was true and fell within the scope of reportable violations.

The Whistleblower is liable, in any case, for any wrongful conduct committed in order to acquire the information reported.

Criteria for the application of safeguards
The above protections apply, by express legal provision, if:

1. at the time of the Report, the reporting person has reasonable grounds to believe that the information on the reported breaches is true and falls within the scope of the so-called *whistleblowing* legislation;
2. the Report was made in accordance with the procedures described in this Procedure;
3. there is a consequential relationship between the report and the retaliatory measures taken.

The reasons that led the person to report are irrelevant for the purposes of his or her protection.

The protection does not apply in cases where 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 offences in cases of wilful misconduct or gross negligence, has been established, even by a judgment of first instance.

It is reiterated that protection is provided not only for the reporting person, but also for the facilitator and for: colleagues who have a stable affective link, colleagues who have a habitual and current relationship with the reporting person, entities owned by the reporting person or for which the reporting person works, as well as entities that operate in the same work environment as the reporting person.

Protection of the reported person

In accordance with the regulations in force, GreenGo undertakes to guarantee the same forms of protection to guarantee the confidentiality of the person reporting the breach also for the person allegedly responsible for the breach, without prejudice to any further form of liability provided for by law which imposes the obligation to communicate the name of the person reporting the breach (e.g. requests by the judicial authorities, etc.).

12. THE SANCTIONS AND DISCIPLINARY SYSTEM

GreenGo provides for sanctions against the Whistleblower, in the event of abuse of the Reporting tool, against the Whistleblower in the event of ascertainment of the reported offences, against the Manager in the event of failure to comply with this Procedure, as well as against those who violate the protection of the Whistleblower's confidentiality and the prohibitions of retaliation laid down to protect the Whistleblower.

The Reporting System has been integrated into Legislative Decree 231/2001 and, consequently, the sanctions provided for in the Disciplinary and Sanctioning System described in detail in the 231 Model are extended and applied in the event of ascertained violations.

In particular, as far as this Procedure is concerned, in accordance with Article 21, paragraph 1, of Legislative Decree No. 24/2023, sanctionable conduct may, for example:

- conduct that obstructs or has attempted to obstruct the Report;
- retaliatory and/or discriminatory conduct, whether direct or indirect, against the person making the Report for reasons connected, directly or indirectly, with the Report itself;
- violations of the measures put in place to protect the whistleblower's right to confidentiality;
- failure to instruct reporting channels, as well as failure to adopt procedures for the receipt and handling of Reports, or the adoption of procedures that do not comply with the legislation;
- failure to carry out verification and analysis of the Report;
- the ascertained criminal liability of the Whistleblower, even if convicted at first instance, for the offences of defamation and slander;
- civil liability of the reporter, in cases of wilful misconduct or gross negligence, for the aforementioned offences.

Any conduct committed in violation of the above provisions, if ascertained, constitutes:

- in the case of employees (including managers), a breach of contract in relation to the obligations arising from the employment relationship pursuant to Articles 2104 and 2106 of the Civil Code;
- in the case of Directors, failure to comply with the duties imposed on them by law and/or the Articles of Association;
- in the case of Third Parties, possible material breach of contract such as to justify, in the most serious cases, the legal termination of the contract.

The procedure for the imposition of disciplinary sanctions therefore takes into account the peculiarities deriving from the qualification of the person against whom proceedings are being taken, in accordance with the CCNL in force and the specific provisions laid down on the subject in the 231 Model adopted by the Company, to which reference should be made for all details.

13. PERSONAL DATA PROTECTION

Each report may contain so-called personal data, i.e. information directly or indirectly traceable to a natural person.
The Company, as Data Controller, ensures that the aforementioned processing activities are carried out in accordance with the requirements of EU Reg. 679/2016 and applicable national regulations.
The rights referred to in Articles 15 to 22 EU Reg. 679/2016 (the right of access to personal data, the right to rectify them, the right to obtain their deletion or so-called right to be forgotten, the right to restriction of processing, the right to portability of personal data and the right to object to processing) may be exercised within the limits of what is provided for by the regulations in force, through the channels indicated in the information notice pursuant to Article 13 EU Reg. 679/2016, made available through a specific section of the company website.

14. INFORMATION AND TRAINING

The Procedure is published on the Company's *website.*
Any information initiatives to bring this Procedure to the attention of possible Whistleblowers (e.g. employees, collaborators, suppliers) are identified.
The Company, on the occasion of the issuance of the Procedure and periodically, organises training courses on this Procedure, including through the inclusion of content on the subject in courses on Model 231, *compliance* and the Code of Ethics.