

INTERNAL REPORTING CHANNEL

Whistleblowing Report Form under Legislative Decree 24/2023

(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 provisions on the protection of persons who report breaches of national laws)

INTERNAL REPORTING FORM

REPORTING PERSON (WHISTLEBLOWER)	<i>Identification data of the reporting person.</i> Note: Do not complete if you intend to make an anonymous communication	
CONTACT DETAILS	<i>Telephone number / address of the reporting person for any further contact.</i> <i>(*) Note.: do not complete if you intend to make an anonymous communication.</i> <i>(**) Note: without at least one item of contact information (telephone number or address) it will not be possible to request further information on or clarification of the reported event.</i>	
POSITION HELD BY THE REPORTING PERSON	<i>Employment or professional relationship established or about to be established with the Firm by the reporting person.</i> Note: Please select the correct field	<input type="checkbox"/> Employees: subordinate employees of the Firm <input type="checkbox"/> Self-employed workers: including persons with a collaboration agreement with the Firm as per Article 409 of the Code of Civil Procedure and Article 2 (<i>Collaborations organized by the principal</i>) of Legislative Decree no. 81/2015 <input type="checkbox"/> Suppliers: workers or independent contractors who provide goods or services to the Firm or execute works for the Firm

		<input type="checkbox"/>	Freelancers and consultants who work at the Firm
		<input type="checkbox"/>	Volunteers and interns , paid and unpaid, who work at the Firm
		<input type="checkbox"/>	Officers: partners and persons holding administrative, management, control, supervisory or representative functions at the Firm
		<input type="checkbox"/>	Others: other third parties who have, have had or are about to enter into an employment or professional relationship with the Firm (<i>please specify</i>)
PERSONS INVOLVED	<i>Identification data of the natural or legal person mentioned in the report as a person to whom the breach is attributed or as a person otherwise implicated in the reported breach</i>	Persons Involved to whom the breach is attributed:	
		Persons who benefited from the breach (if known):	
		Persons harmed by the breach:	
		Any other persons involved in the incident:	
		Any persons who can report on the event:	
TYPE OF BREACH	<i>Behaviours, acts or omissions that are detrimental to the public interest or integrity of the Firm. Note: Please select the correct field</i>	<input type="checkbox"/>	1-Wrongdoing: relevant unlawful conduct under Legislative Decree no. 231/2001 or breaches of the organization and management models set forth therein
		<input type="checkbox"/>	2-EU offences: offences under the laws of the European Union ("EU"), national laws (indicated in the Annex to Legislative Decree No. 24/2023) or national laws implementing EU laws relating to the following sectors: public procurement; financial services, products and markets and the 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; protection of private life and protection of personal data and security of networks and information systems
		<input type="checkbox"/>	3-Financial interests: acts or omissions that harm the EU's financial interests
		<input type="checkbox"/>	4-EU Market and Taxes: acts or omissions relating to the EU internal market, including infringements of competition and state aid and corporate tax or mechanisms whose purpose is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax legislation

		<input type="checkbox"/>	5-Other: acts or behaviours that frustrate the object or purpose indicated in numbers 2), 3) and 4)		
DATE AND PLACE	<i>Circumstances relating to the time and place in which the reported event occurred</i>				
EVENTS	<i>The subject matter of the report is information, including well-founded suspicions, concerning breaches committed or which, on the basis of factual evidence, may have been committed, as well as information concerning behaviours intended to conceal such breaches</i>	Please provide a concise but accurate description of the events on which the report is based:			
OTHER INFORMATION	<i>Other information useful for verifying the truthfulness and validity of the report</i>				
ANY DOCUMENTATION ACCOMPANYING THE REPORT	<i>It is useful to attach documents that can evidence the reported events</i>	List of any documents accompanying the report:			
OTHER PERSONS TO WHOM THE REPORT RELATING TO THE REPORTED EVENTS ABOVE HAS BEEN SUBMITTED	<i>Please indicate (where possible) the other authority(ies) or persons, if any, to whom the report has been submitted, the date and the follow-up</i>	<u>Subject</u>	<u>Date</u>	<u>Follow-up</u>	

The format and content of the communication containing the report to the Firm's Internal Reporting Channel are free form, within the limits of the essential contents and conditions established by Legislative Decree 24/2023. In any case, the reporting person (*i.e.*, the *whistleblower*) is asked, where possible, to use this internal reporting form prepared by *Studio Legale Associato in associazione con Clifford Chance* to facilitate the management and verification of the internal report and the conduct of investigations and analysis of the relevant events.