

SUMMARY PROCEDURE FOR THE MANAGEMENT OF WHISTLEBLOWING REPORTS AND OTHER REPORTS

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VERSIONE #01

The following are the main topics covered in the procedure for handling whistleblowing and other reports adopted by MSC Technology Italia S.r.l. (hereinafter "**MSC Tech.**" or the "**Company**"), to which reference is made for completeness of information.

1. PREMISES

MSC Tech. ensures a work environment in which it is possible to freely report any illegitimate behavior that has taken place within the Company.

2. WHAT CAN BE REPORTED

TYPE OF REPORT	MATERIAL SCOPE OF APPLICATION (Offences that can be reported))
WHISTLEBLOWING REPORTS (hereinafter " Reports/Whistleblowing Reports ")	1) Unlawful activities falling within the scope of application of European Union or national acts relating to the following sectors: - Public procurement; - Services, products, and financial markets, including prevention of money laundering and terrorist financing; - Product safety and compliance; - Transportation safety; - Environmental protection; - Radiation protection and nuclear safety; - Food and feed safety, animal health and welfare; - Public health; - Consumer protection; - Privacy protection and personal data security, network and information system security. 2) Acts or omissions harming the financial interests of the European Union, as per Article 325 of the Treaty on the Functioning of the European Union. 3) Acts or omissions concerning the internal market, as per Article 26, paragraph 2, of the Treaty on the Functioning of the European Union. 4) Acts or behaviors undermining the purpose or objectives of the provisions of the European Union acts in the aforementioned sectors. In any case, the whistleblower may not use the Whistleblowing Reports to make job-related claims against hierarchical superiors, for which they must refer to the dedicated channel provided, regulated in paragraph 5 of this procedure.
OTHER REPORTS (di seguito " Other Reports ")	All violations not falling within the reportable offenses under Article 2, paragraph 1, sub-paragraph a of Legislative Decree No. 24/23 in the whistleblowing context and listed in the immediately preceding line.

3. WHO CAN SUBMIT A REPORT – RECIPIENTS OF THE REPORT

Whistleblowing reports

Who can submit a report

Reports can be submitted by:

- a) Employees of public administrations, as well as employees of independent administrative authorities for oversight, supervision, or regulation;
- b) Employees of economic public entities, private law entities subject to public control, in-house companies, public law bodies, or public service concessionaires;
- c) employees of private sector entities;
- d) self-employed workers;
- e) Workers and collaborators providing goods or services or carrying out work for third parties;
- f) Freelancers and consultants;
- g) Volunteers and interns;
- h) Shareholders and individuals with administrative, Report Managerial, supervisory, oversight, or representative functions.

The aforementioned reports may also be made by the subjects listed in letters from a) to h) even when the legal relationship has not yet commenced, if the information on the violations was acquired during the selection process or in other pre-contractual stages, during the probationary period, or subsequently to the termination of the legal relationship, if the information on the violations was acquired during the relationship itself.

Recipient of the report

MSC Tech. has identified an external Committee consisting of individuals appointed as the Report Manager of Whistleblowing Reports (hereinafter the "**Report Manager**"). For the purpose of managing Whistleblowing Reports, these individuals have received specific training and ensure the requirement of independence. Upon receipt of each report, MSC S.A. will be informed and, upon closure of each Report, information will be provided to the Management of MSC Tech. and MSC S.A., in accordance with the confidentiality obligations established by the law and the present procedure, limiting itself to providing information at the macroaggregate level.

Other reports

Who can submit a report

Other Reports may be made by any employee of MSC Tech, i.e. by any person who has qualified relationships with MSC Tech. (supplier relationships, customers, etc.).

Recipient of the report

MSC Tech. created an internal committee (hereinafter the "**Committee**") in charge of receiving and handling Other Reports. In the event that Other Reports are received in respect of any of the members of the Committee, MSC Tech. will undertake to ensure that they are handled with the utmost confidentiality.

These individuals, for the purpose of handling Other Reports, are provided with specific training and guarantee the requirement of independence. Upon receipt of each report, MSC S.A. will be informed and, upon closure of each Report, information will be provided to the Management of MSC Tech. and MSC S.A., in accordance with the

confidentiality obligations established by the law and the present procedure, limiting itself to providing information at the macroaggregate level.

4. INTERNAL REPORTING CHANNELS ADOPTED BY MSC TECH.

Whistleblowing Reports

for oral reports: <i>"My Governance Zucchetti"</i> portal	Request for a direct meeting with the Report Manager. Link: https://areariservata.mygovernance.it/#!/WB/MSCTechnology-Italia .
For written reports: <i>"My Governance Zucchetti"</i> portal	Submission and management of the report through the forms available on the portal, with the option to check the status of the report. Link: https://areariservata.mygovernance.it/#!/WB/MSCTechnology-Italia .

Other Reports

for oral Reports: <i>"My Governance Zucchetti"</i> portal	Link: https://areariservata.mygovernance.it/#!/WB/MSCTechnology-Italia .
for written Reports: <i>"My Governance Zucchetti"</i> portal	Submission and Management of the Report. Link: https://areariservata.mygovernance.it/#!/WB/MSCTechnology-Italia .

For instructions on the use of internal reporting channels, please refer to the extended version of the Procedure for Handling Whistleblowing Reports and Other Reports.

4.2 Content of the Whistleblowing Reports and Other Reports

Whistleblowing Reports

- the circumstances of time and place in which the reported incident occurred;
- a description of the incident;
- the personal details or other elements enabling identification of the person to whom the reported facts are to be attributed.
- reports based solely on mere assumptions and/or suspicions and/or rumors and/or opinions of the Whistleblower and/or any third parties indicated by the Whistleblower, or containing information known by the Whistleblower to be false, are not worthy of protection and, consequently, will not be examined by the Report Manager.

It is also useful to attach documents that may provide elements of substantiation of the facts being reported, as well as the indication of other persons potentially aware of the facts.

Other Reports

- the circumstances of time and place in which the fact that is the subject of the report occurred;
- the description of the fact;

- the generalities or other elements that make it possible to identify the person to whom the reported facts are attributed.
- Reports based on mere suppositions and/or suspicions and/or rumors and/or opinions of the reporter and/or any third parties indicated by the reporter or containing information that the reporter knows to be false are not worthy of protection and, consequently, are not subject to examination by the Committee.

It is also useful to attach documents that may provide elements of substantiation of the facts being reported, as well as the indication of other persons potentially aware of the facts.

4.3 Report management process – internal channels

Whistleblowing Report



Other Reports



5. OTHER REPORTING CHANNELS (Whistleblowing Reports)

- External reporting channels activated by ANAC: **i)** portal accessible at the following link: <https://servizi.anticorruzione.it/segnalazioni/#!/#%2F>; **ii)** telephone service; **iii)** direct meeting.
- public disclosure
- complaint to the judicial authority.

6. PROTECTION OF THE REPORTER

- **CONFIDENTIALITY:** confidentiality of the identity of the person making the report, the person involved and the person in any case mentioned in the report, as well as the content of the report and related documentation.
- **PROTECTION MEASURES:** any form of retaliation against the reporter is prohibited (e.g., any dismissal imposed as a result of the report is null and void).
- **SUPPORT MEASURES (Whistleblowing Reports):** a list of Third Sector entities that provide reporting persons with support measures consisting of information, assistance and advice on ways of reporting, protection from retaliation, rights of the person involved, terms and conditions of access to legal aid.