

WHISTLEBLOWING MANAGEMENT PROCEDURE

L01.001 - first issue



REFERENCE PROCESS

Managing reports of breaches



RESPONSIBLE ORGANISATIONAL STRUCTURE/LEGAL ENTITY

Ipack Ima Srl



MAIN RECIPIENTS

All Ipack Ima staff including external staff; workers or external staff providing goods or services or carrying out works for third parties; freelancers; consultants; volunteers and trainees; shareholders and individuals with administrative, management, control, supervisory or representative functions.



OBJECTIVES

Ipack Ima undertakes to protect from possible intimidation and retaliation those who have made, in good faith, a report of illicit conduct relevant to Legislative Decree 231, or violations of Model 231, of which they have become aware in their working context, as well as those subjects other than the reporting person who could be the recipients of retaliation, even indirectly, due to the role assumed in the reporting process and/or the particular relationship between the reporting person. As regards Reports made by persons who have declared their personal details and that are in bad faith and/or are proven to have a slanderous/defamatory content, the measures provided for in the corporate disciplinary system will be taken against the identified reporting person, and appropriate legal action will be evaluated.



MAIN CONTENTS

- Illustration of the mechanisms for protecting the reporting person, the reported person and confidentiality;
- Procedure for sending the report and report contents;
- Illustration of the process for handling reports, with information about the persons in charge and/or control bodies responsible for each activity;
- Description of activities to monitor corrective actions and the management of disciplinary measures.



MAIN NEW ASPECTS

This procedure incorporates the following new aspects:

- **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;
- **Legislative Decree 24/2023** (the "Whistleblowing Decree"), transposing Directive (EU) 2019/1937. The purpose of Legislative Decree 24/2023, in the wake of the European Directive, is to consolidate the legal protection of persons who report breaches of national or European regulatory provisions, which harm the interests and/or integrity of the public or private entity to which they belong, and of which they become aware in the course of their work. More generally, the decree aims to promote a culture of legality and compliance in organisational contexts, through the harmonisation of whistleblowing regulations in relation to indications of European Union institutions and international best practices.

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APPROVAL LEVELS

Approved by the Board of Directors of Ipack Ima Srl on 5 December 2023



SCOPE

This document applies to the company Ipack Ima S.r.l

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1. REFERENCE PRINCIPLES

1.1 LEGAL FRAMEWORK

The Legislator approved **Law no. 179 of 30 November 2017**, containing 'Provisions for the protection of persons reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship' (the '**Whistleblowing Law**'). This Law defines:

- the aspects protecting the reporting employee;
- the obligations of Entities and Companies in terms of the non-discrimination of reporting persons and the protection of their confidentiality;
- the need for the presence of one or more channels (in computerised form) enabling reporting persons to submit reports while guaranteeing the confidentiality of their identity;
- the ban on retaliatory or discriminatory acts against the reporting person for reasons related to the report;
- the need to have - in the disciplinary system - sanctions against individuals who violate the measures to protect the reporting person, and against individuals who make reports with wilful misconduct or gross negligence that turn out to be unfounded.

The law also reiterates that reports of unlawful conduct relevant under Decree no. 231/2001 or of breaches of the Company's Organisation and Management Model, made by employees that have become aware of said, due to the functions they perform, must be described in detail and based on precise and consistent facts, which they have become aware of, due to the functions they perform.

Moreover, **the European Whistleblowing Directive (2019/1937)** requires all Member States to adopt specific regulatory provisions concerning the protection of individuals who report infringements and/or breaches of EU legislation (regulations, and EU directives implemented in the Member States). In addition, the aforementioned Directive provides for the adoption of new standards of protection for persons reporting wrongdoings they become aware of, through (i) the introduction of effective, confidential and secure reporting channels, (ii) the effective protection of reporting persons.

The Directive aims, among other things, to incentivise the cooperation of workers in order to encourage the emergence of corrupt phenomena within public and private entities, including through the provision of systems enabling workers to safely report any wrongdoing of which they become aware.

Lastly, **Legislative Decree 24/2023** implementing 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 provisions concerning the protection of persons who report breaches of national laws (the "**Whistleblowing Decree**") regulates the protection of persons who report breaches of national or European Union law that harm the public interest or the integrity of the public administration or a private entity, with the main objective of transposing into a single law provisions on the protection of reporting persons, by coordinating (and repealing) the existing regulations referred to in Law 179/2017, aligning with the Directive. The Decree, with particular reference to the private sector, provides for the following, among others:

- the extension of violations that can be reported (previously limited to violations of interest of Legislative Decree 231/2001);
- the extension of private-law entities required to put in place a reporting management system (including, for example: private entities that employed an average of at least 50 employees in the previous year; private entities falling within particular sectors and entities

that have adopted an Organisation and Management Model pursuant to Legislative Decree 231/2001, even if they do not reach the average of at least 50 workers);

- the possibility for reporting persons to use external reporting channels when special conditions are met;
- the possibility for the reporting person to publicly disclose (through the press or through electronic or other means of dissemination) the violation under special circumstances;
- the application of sanctions in the event of non-compliance with the provisions of the Decree.

2. REFERENCES

- Code of Ethics;
- Organisation, Management and Control Model pursuant to Legislative Decree 231/01;
- Organisational Chart, Function Chart and Service Orders;
- **Law 179/2017** - Provisions for the protection of persons reporting crimes or irregularities they have become aware of in the context of a public or private employment relationship;
- **Directive (EU) 1937/2019** - Protection of persons who report breaches of Union law;
- **Legislative Decree 231/2001** - Administrative Liability of Companies and Entities;
- Regulation (EU) 2016/679 (GDPR) and Legislative Decree 196/03 - Data Protection Code, as amended by Legislative Decree 101/2018;
- **Legislative Decree 24/2023** implementing 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 provisions concerning the protection of persons who report breaches of national laws.
- **ANAC Guidelines**, Guidelines on the protection of people who report violations of Union law and the protection of people who report violations of national regulatory provisions. Procedures for the presentation and management of external reports.

3. DEFINITIONS AND ABBREVIATIONS

Ipack Ima Srl: Company with registered office in Rho, Strada Statale del Sempione 28 (MI).

Model 231: Organisation, Management and Control Model pursuant to Legislative Decree 231/01.

SB: Supervisory Board of Ipack Ima with autonomous powers of initiative and control, tasked with supervising the operation of and compliance with Model 231 and ensuring it is updated. For the purposes of compliance with the Code of Ethics, the Supervisory Board is referred to as the "Authority for the Application of the Code".

Group Internal Audit Management Department of Fiera Milano Spa: Internal Audit Department of Fiera Milano which carries out, on the basis of a *shared service* agreement, audit activities, aimed at ascertaining, both on a continuous basis and in relation to specific needs, the conformity of company processes, behaviours and practices with internal procedures and current legislation.

Personnel: permanent and non-permanent employees (trainees, office workers, middle managers and executives), members of corporate boards and external staff working on a permanent basis for Ipack Ima Srl.

Third parties: external parties in a relationship of interest with Ipack Ima Srl. (suppliers, customers, consultants, auditing firms, business partners, associates, external staff, etc.).

Whistleblowing/Reporting: means any communication made, through the identified channels, presented to protect the integrity of the Company, of illicit conduct relevant to Legislative Decree 231 or violations of the principles of the Code of Ethics, of the Organisational Model 231 and of the internal procedures adopted by the Company , based on precise and consistent factual elements, of which the recipients have become aware due to the functions performed.

4.PROCESS DESCRIPTION

4.1 REPORTING COVERED BY THIS PROCEDURE

This Procedure covers the following types of Reporting (also referred to as 'whistleblowing'):

- unlawful conduct, relevant under Legislative Decree 231/01; and breaches or suspected breaches of the Model, the Code of Ethics or Preventive Protocols from which a sanction risk may arise for the Company pursuant to the Decree;

Reported conduct:

- may qualify as the **commission** of a specific breach or even as merely an **omission** of expected conduct;
- may concern a **request to commit a breach** or **inducement** to commit a breach;
- is likely to cause **damage or harm to the Company, whether economic**, financial or even just reputational.

The following cannot be reported:

- a) challenges, claims or demands linked to a personal interest of the person which relate exclusively to their individual work relationships, or inherent to their work or public employment relationships with hierarchically superior figures;
- b) breaches of national security, and of contracts relating to defence or national security aspects, unless those aspects are covered by relevant secondary law of the European Union.

4,2 RECIPIENTS

This procedure is valid for all Ipack Ima staff external staff; workers or external staff providing goods or services or carrying out works for third parties; freelancers; consultants; volunteers and trainees; shareholders and individuals with administrative, management, control, supervisory or representative functions.

In particular, the recipients of this document are:

- the top management and members of the corporate boards of Ipack Ima;
- individuals who hold representative, administrative or managerial positions in the entity or in one of its organisational units with financial and functional autonomy, as well as individuals who manage and control said, also on a de facto basis;
- individuals managed or supervised by one of the above-mentioned persons (so-called subordinates);
- the employees of Ipack Ima, even if in a probationary period;

- partners, customers, suppliers, consultants, external staff, trainees, associates and, more generally, anyone who is in a relationship of interest with Ipack Ima ("Third Parties"), whether paid or unpaid.

4.3 INTERNAL AND EXTERNAL REPORTING CHANNELS

Reports can be made through various channels:

- in **writing**: (i) by computerised means, using dedicated reporting software suitable for guaranteeing, with encryption tools, the confidentiality of the reporting person's identity, of the reported person's identity and of the person(s) mentioned in the report, if any, as well as the content of the report and of the relevant documentation. The platform is accessible through a dedicated *link* on the website www.ipackima.com. Access to the Software is appropriately profiled for the company's users; (ii) by ordinary mail, and only if the aforementioned portal is unavailable, to the address: Supervisory Body c/o Ipack Ima – Strada Statale del Sempione, 28 – 20017 Rho (MI);
- in **oral form**: upon request of the reporting person, through a direct meeting with the Supervisory Body set within a reasonable timeframe, in any case not exceeding 15 working days from receipt of the request.

The management of the reporting channel is entrusted to the SB. It monitors the proper computerised operation of procedures for managing and filing the Reports received on the dedicated software, in order to ensure the traceability of all Reports received and of the documents annexed to them, in relation to their assessment and verification.

When, at the request of the reporting person, the report is made orally during a meeting with the Supervisory Body, it, with the prior consent of the reporting person, is documented by recording on a device suitable for storage and listening or by means of a verbal report. In the case of minutes, the reporting person may verify, rectify and confirm the minutes of the meeting by signing them.

As part of the management of the internal reporting channel, the SB carries out the following activities:

- issues the reporting person with an acknowledgement of receipt of the report **within seven days** of its receipt;
- liaises with the reporting person and may request additions from the latter if necessary;
- '**diligently follows up**' reports received (this action is overseen by the person entrusted to manage the report to assess the existence of the facts reported, the outcome of investigations and any measures taken);
- provides feedback on the report **within three months** of the date of the acknowledgement of receipt or, in the absence of such a notice, within three months of the expiry of the seven-day period from the submission of the report;
- provides clear information on the channel, procedures and requirements for making internal reports, as well as on the channel, procedures and requirements for making external reports. The above information is displayed and made easily visible in the workplace, and is also readily accessible on the company website.

An internal report mistakenly submitted to a person other than the persons indicated shall be forwarded immediately, and in any case within seven days of its receipt, to the competent person, giving notice of its transmission, at the same time, to the reporting person. The person who has received the report in error is prohibited from keeping a copy of it.

An **anonymous report** is a report without elements that make it possible to identify the sender of the message. That said, for the purposes of this procedure, it should be noted that

anonymous reports will only be taken into account if they are substantiated and adequately documented.

In particular, they must contain a detailed statement of the essential elements of the fact and, where possible, the particulars of the person to whom the fact is attributed, of the people who are in a position to report on circumstances relevant to the reconstruction of the facts, and also indicate or, where possible, attach documentation supporting what has been alleged.

All reports that do not meet the above criteria and/or which are affected by mere generic nature, approximation, or which translate into mere complaints will be excluded from the management process.

4.4 CONTENT OF THE REPORT

The reports must be detailed, based on precise and consistent factual elements and have the greatest possible degree of completeness and exhaustiveness.

Where possible, the reporting person is required to provide all available and useful information to enable the competent persons to carry out appropriate, due controls and checks to verify the validity of the reported facts, such as:

- a clear and complete description of the facts that are being reported;
- the circumstances of the time and place when and where the reported facts were committed;
- personal details or other elements identifying the person(s) who committed the reported facts (e.g. job title, place of employment);
- any documents supporting the report;
- an indication of any persons who may report on the facts being reported;
- any other information that may provide useful feedback on the existence of the reported facts;
- any private interests linked to the report.

In order for a report to be substantiated, these requirements do not necessarily have to be met at the same time, seeing that the reporting person may not have all the required information.

More specifically, through the IT channel and thus through the software, the reporting person is guided during each stage of the report and has the chance to compile a number of mandatory fields that meet the requested requirements, in order to best provide details.

It is essential that the elements indicated are known directly by the reporting person and that they are not reported or referred to by others.

4.5 PROTECTION OF CONFIDENTIALITY AND PROCESSING OF PERSONAL DATA.

The identity of the reporting person and any other information from which this identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those competent to receive or follow up the reports and expressly authorised to process such data.

The Supervisory Body of the company that receives a report and/or are involved, in any capacity whatsoever, in the management of the report, is required to guarantee the utmost

confidentiality of the persons (reporting and reported persons) and the facts reported, except in the cases indicated below:

- the Reporting person incurs criminal liability on the grounds of slander or defamation under the provisions of the Italian Criminal Code;
- the Reporting person incurs non-contractual civil liability pursuant to Article 2043 of the Italian Civil Code;
- knowledge of the identity of the Reporting person is indispensable for the assessment of the Report;
- in the event of any investigations or proceedings initiated by the judicial authorities.

In the case of criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and to the extent provided for in Article 329 of the Code of Criminal Procedure.

In the case of proceedings before the Court of Auditors, the identity of the reporting person cannot be disclosed until the investigation phase is closed.

In the case of disciplinary proceedings, the identity of the reporting person may not be disclosed, where the objection to the disciplinary charge is based on investigations that are separate and additional to the report, even if consequent to it. If the objection is based, in whole or in part, on the report, and knowledge of the identity of the person making the report is indispensable for the defence of the accused person, the report may be used for the purposes of disciplinary proceedings only if the person making the report expressly consents to the disclosure of his or her identity. The reporting person shall be notified in writing of the reasons for the disclosure of the confidential data, where disclosure of the identity of the reporting person and of the information is also indispensable for the defence of the person concerned.

Breach of the duty of confidentiality, apart from the exceptions listed, is a source of disciplinary liability, without prejudice to any further liability provided for by law.

Personal data that are clearly not useful for processing a specific report are not collected or, if accidentally collected, are deleted immediately.

Reports and related documentation are kept for as long as necessary to process the report and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure, subject to confidentiality obligations.

The Data Controller of personal data in the management of Reports is identified as IPack Ima Srl, with registered office in Strada Statale del Sempione, 28 – 20017 Rho (MI).

The annex to section 9 of this Procedure contains the text of the privacy notice for the processing of personal data related to Reports.

4.6 PROTECTIVE MEASURES FOR THE REPORTING PERSON

IPack Ima guarantees people who make reports in good faith against any retaliatory action or behaviour directly or indirectly linked to the reporting, which causes or may cause, directly or indirectly, unfair damage to the reporting person.

Protection against retaliatory acts is extended to all individuals connected in a broad sense with the reporting organisation and/or person:

- self-employed workers, external staff, freelancers and consultants;
- volunteers and trainees, paid and unpaid;

- shareholders and persons with administrative, management, control, supervisory or representative functions, even if such functions are exercised on a de facto basis;
- so-called **facilitators** (people who assist the worker in the reporting process, operating in the same work-related context and whose assistance must be kept confidential);
- people from the same working context as the person who made a report and who are linked to that person by a stable emotional or kinship bond within the fourth degree;
- the work colleagues of the person who made a report, who work in the same work context as the person and who have a usual and current relationship with that person;
- entities owned by the person who made a report or for which the same people work, as well as entities that operate in the same working context as the aforementioned person.

The protection of reporting persons applies even if the report is made i) when the employment relationship has not yet started, if the information on the violations was acquired during the selection process or in other pre-contractual phases; (ii) during the probationary period; (iii) after termination of the employment relationship if the information on breaches was acquired in the course of that relationship.

Persons making reports in good faith are also protected in the event that, at the time of making the report, they had reasonable grounds to believe that the information on the breaches was true and fell within the scope of the Procedure.

Protection also applies if, after anonymous reporting, the reporting person is identified and suffers retaliation.

The reasons that led the person to report are irrelevant for the purposes of their protection.

The protective measures consist of:

- **A ban on and protection from retaliation**: the person making a report may not be subject to retaliation. Reporting persons may inform ANAC of the retaliation¹ they believe they have suffered and the Authority is obliged to inform the National Labour Inspectorate, for measures within its remit. The judicial authority shall take all measures, including provisional measures, necessary to ensure the protection of the subjective legal situation asserted, such as: compensation for damages, reinstatement in the workplace, an order to cease the retaliatory conduct engaged in, a declaration of the invalidity of the acts adopted which result in an act of retaliation.
- **Support measures**: support measures are in place for reporting persons, provided by third sector bodies, such as: information, assistance, advice free of charge on how to report and on protection from retaliation, on the rights of the person concerned, as well as on the terms and conditions of access to legal aid. ANAC keeps a list of Third Sector entities that provide reporting persons with support measures. The list, published by ANAC on its website, contains the Third Sector entities that have entered into a specific agreement with ANAC.

¹ Article 17 of the Decree identifies some cases classifiable as 'retaliation': a) dismissal, suspension; b) downgrading or non-promotion; c) change of duties, change of the place of work, reduction of salary, change of working hours; d) suspension of training; e) negative merit notes; f) the adoption of disciplinary measures or other sanctions, including fines; g) coercion, intimidation, harassment or ostracism; h) discrimination or otherwise unfavourable treatment; i) the failure to convert a fixed-term employment contract into an employment contract of indefinite duration where the employee had a legitimate expectation of such a conversion; l) non-renewal or early termination of a fixed-term employment contract; m) damage, including to a person's reputation, in particular on social media, or economic or financial loss, including loss of economic opportunities and loss of income; n) improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future; o) early termination or cancellation of the contract for the supply of goods or services; p) cancellation of a licence or permit; q) the request to undergo psychiatric or medical examinations¹.

- **Limitations of liability:** persons will not be punished if, in making a report: (i) they disclose or disseminate information on breaches covered by the obligation of secrecy, relating to copyright protection or the protection of personal data; or (ii) they disclose information about breaches that offend the reputation of the reported person; when, at the time of disclosure or dissemination, there were reasonable grounds to believe that the disclosure or dissemination of the same information was necessary to reveal the violation and the reporting, public disclosure or complaint to the judicial or accounting authority was carried out in accordance with as required by law and this procedure. When these hypotheses occur, any further liability, even of a civil or administrative nature, is also excluded. Unless the fact constitutes a crime, these cases do not give rise to any liability, even of a civil or administrative nature, for the acquisition of information on violations or for access to them. Liability is, however, not excluded for conduct, acts or omissions not related to the report or not strictly necessary to disclose the breach.

The protections are not guaranteed if the criminal liability of the reporting person for the crimes of defamation or slander or their civil liability is ascertained, even with a first degree sentence, in cases of wilful misconduct or gross negligence (please note that, in such cases, a disciplinary sanction is also applied to the reporting person).

5. MANAGEMENT OF THE INTERNAL REPORTING CHANNEL

5.1 Management Body

The SB is the body responsible for receiving, examining and evaluating reports.

As part of the management of the internal reporting channel, the SB carries out the following activities:

- issues the reporting person with an **acknowledgement of receipt** of the report within **seven days** of its receipt;
- liaises with the reporting person and may request additions from the latter if necessary;
- **'diligently follows up'** reports received (this action is overseen by the person entrusted to manage the report to assess the existence of the facts reported, the outcome of investigations and any measures taken);
- provides **feedback** on the report within three months of the date of the acknowledgement of receipt or, in the absence of such a notice, within three months of the expiry of the seven-day period from the submission of the report;

Furthermore, for all Reports received, it is responsible for:

- evaluating the Reports received, activating the assessment and audit activities deemed necessary, with the support of the Group Internal Audit Department of Fiera Milano SpA and possibly specialised external companies;
- formalising the assessments and decisions made in specific intermediate or final reports to complete the investigations carried out;
- filing, through authorised users, their reports and supporting documents;

- updating, through authorised users, the status of reports in the dedicated web platform.

5.2 Preliminary Verification

The SB is activated every time a report is received and has the task of verifying the admissibility of the report received.

All internal reports received are subject to a preliminary check by the Supervisory Body, which analyses the communication and any documentation received from the Reporting Person and carries out a preliminary examination of the existence of the conditions, necessary to initiate further investigations.

In particular, the initial assessment takes into account the existence of a reasonable presumption of validity/reliability, at least with regard to the possibility of carrying out concrete verifications of the facts reported, excluding all cases in which the completely generic nature of the reports does not even allow for a verification directed towards concrete perspectives, in which case the conditions for filing are implicitly determined.

In preliminary verification activities, the Supervisory Body may avail itself of the support of the Internal Audit Department of Fiera Milano or specialised consultants, based on the specific skills required in relation to the content of the Report being verified.

At the end of the preliminary verification, the SB files unsubstantiated internal reports or those which, based on the description of the facts and the information provided by the Reporting person, do not allow obtaining a sufficiently detailed picture to be able to initiate further investigations to ascertain their validity, as well as those that are manifestly unfounded.

5.3 Investigation

If the preliminary verification has established that the internal report is adequately detailed and accompanied by evidence whose authenticity it has been possible to verify, the Supervisory Body carries out the following activities:

- in the event that the existence of sufficiently detailed elements emerges or - in any case - that the facts reported are not unfounded, promptly inform the Chairperson and the CEO of the Company;
- informs the Board of Statutory Auditors in cases of alleged accounting irregularities and/or deficiencies in the company's accounting control system;
- informs the heads of functions involved on a case by case basis;
- evaluates the further appropriate investigative actions to be carried out (e.g. requesting management insights, starting an audit or fraud investigation), possibly making use of the Internal Audit Department of Fiera Milano based on specific skills, or of external consultants, where necessary;
- if it does not deem it necessary to request the Group Internal Audit Management of Fiera Milano, or possibly specialised companies, to carry out investigations/audits, it decides whether and which recommendations to make in writing to the management of the areas/processes involved and whether there are elements to sanction unlawful or irregular behaviour of Ipack Ima staff or third parties;

- interrupts in-depth investigation activities if, following them, it emerges that the Report is unfounded or that the latter relates to facts already known and analysed, regardless of the relative final outcome;
- suggests any initiatives to be undertaken to protect the interests of the company (e.g. legal action, suspension/cancellation of suppliers from the Fiera Milano Group's Supplier Register, to which Ipack Ima refers on the basis of Shared Service agreements, contractual withdrawal, etc.).

In all phases of the process, the SB:

- guarantees impartiality, autonomy and independence of judgment in the analysis and evaluation of internal reporting;
- ensures the confidentiality of the information collected and the confidentiality of the Reporting person's details, where provided;
- undertakes not to use internal reports beyond what is necessary to adequately follow up on them.

At the end of the preliminary investigation phase by the SB, decisions can take the form of:

- corrective action recommendations;
- proposals for disciplinary measures for the parties involved in the reported facts (both internal and third parties);
- timely information to the Board of Directors and the Board of Statutory Auditors for the adoption of appropriate reporting actions to the judicial authority in the cases provided for by the relevant laws;
- filing, if the reports (i) do not fall within the definition set out in this Procedure by forwarding the same, if necessary, to other company Departments/Functions; (ii) are clearly unfounded or in bad faith or of such generic content that it does not allow any verification regarding the same or relating to facts already known and analysed, regardless of the relative final outcome.

The reasons for the dismissal decision are formalised in writing and communicated to the Reporting person, if known.

All parties involved will not be able to reveal the identity of the Reporting person and any other information from which such identity can be deduced, directly or indirectly, without the express consent of the Reporting person, to persons other than those competent to receive or follow up on the reports, expressly authorised to process such data pursuant to articles 29 and 32, par. 4 of Regulation (EU) 2016/679 and Article 2-*quaterdecies* of Legislative Decree 196/2003.

5.4 Special cases

In order to guarantee the independence and impartiality of judgment of the body responsible for receiving, examining and evaluating the Reports, if the Report concerns the Supervisory

Body, it notes that a report has been received, with respect to which it is in conflict of interest, and will transmit the report to the Board of Directors, by delivering the documentary file to the Chairperson of the Board of Directors.

The Board of Directors, having consulted the Board of Statutory Auditors, after having collectively assessed whether the internal report is accompanied by the information necessary to preliminarily verify its validity and be able to start subsequent in-depth activities, carries out the investigation making use of the company's expertise and, if necessary, of specialised consultants.

The investigation follows the *process* described in this Procedure.

The decision of the Board of Directors is formalised through a written resolution.

If the report concerns a member of the Board of Directors or a member of the Board of Statutory Auditors, it will be handled by the remaining members of the two corporate bodies.

The final decision is formalised in a specific written resolution.

5.5 Reporting

Every six months, during the periodic report from the Supervisory Body to the Board of Directors and the Board of Statutory Auditors, the Supervisory Body informs and reports on the reports received and managed in the reference period, as well as the final outcomes of each of them.

5.6 Filing, logging and storage

The Supervisory Body assigns a specific alphanumeric ID to the report and proceeds to record the details of the report in a computer register, in particular:

- day and time;
- reporting person;
- subject of the report;
- notes;
- status of the report (to be filled in at each stage of the process, e.g. preliminary investigation, investigation and communication of the evidence that emerged, filing).

If the report arrives on an electronic platform, the software itself provides for complete and confidential logging in compliance with the relevant legislation.

Where the report is received via a different channel, the same logging procedure is carried out.

The assessments and decisions of the SB, the information provided in the case of reports relating to relevant facts and the (if any) recommendations and proposals for the application of disciplinary measures are in all cases formalised in writing in a specific report and are filed in protected network folders, in order to guarantee the traceability, confidentiality, storage and availability of data both throughout the procedure and for the future.

The internal reports received are kept for the time necessary to process the report and in any case no later than five years from the date of communication of the final outcome of the reporting procedure in compliance with the confidentiality obligations referred to in Article 12 of Legislative Decree 24/2023 and the principles referred to in Article 5, par. 1, letter. e) of Regulation (EU) 2016/679 and Article 3, par. 1, letter. e) of Legislative Decree 51/2018. In the event of defence investigations by the Company (the controller) or investigations and inspections by the judicial authorities or judicial police, as well as in the event of litigation or proceedings, this deadline may be extended until the conclusion of such activities or proceedings.

6. MONITORING OF CORRECTIVE ACTIONS

It is the responsibility of the management of the areas/processes involved to implement the recommendations received from the Supervisory Body on the basis of this Procedure and the corrective actions (action plans), also possibly indicated in the reports drawn up at the conclusion of the audits conducted by the Fiera Group Internal Audit Management Milan with the possible support of specialised companies.

The SB, with the support of the Group Internal Audit Management, monitors the implementation of the recommendations and action plans, informing the Board of Statutory Auditors and top management.

The Supervisory Body, through authorised users, files the information received regarding the corrective actions in the dedicated database corresponding to the reference report.

7. SANCTION SYSTEM

Depending on the profile of the party to whom the internal report refers (reported person), the Supervisory Body identifies the company function responsible for proceeding with any necessary measures/interventions, informing the Board of Directors, whilst keeping the identity of the Reporting person secret, except in cases of law or authorisation for disclosure by the Reporting person themselves.

In particular, the SB, in compliance with the relevant legislation, indicates the need for measures:

- to the CEO, in the case of disciplinary sanctions to be applied against employees and managers;
- to the Board of Directors or the Board of Statutory Auditors, in the case of measures to be adopted, respectively, towards members of the Board of Statutory Auditors or the Board of Directors;
- to the internal manager who manages the contractual relationship with any third parties (e.g. suppliers, collaborators, consultants, etc.);
- to the CEO, in any event, for information.

In the case of criminally relevant conduct for which Ipack Ima can file a complaint or in respect of which it can lodge a complaint, in compliance with the provisions of the relevant laws, the SB promptly informs the Board of Directors and the Board of Statutory Auditors of the Company for the adoption of appropriate actions.

In cases of provisions for significant facts pursuant to Legislative Decree 231/01, the SB makes a proposal for provisions to be submitted to the Company's Board of Directors.

The body responsible for activating the sanctioning system decides which type of disciplinary sanction to impose on subjects who have committed violations ascertained following internal reporting.

The sanction, which must be in line with the provisions of the applicable labour law, must be proportionate to the seriousness of the offence.

In the event that the Reporting person is jointly responsible for the violations, privileged treatment is provided for the latter compared to the other jointly responsible persons, compatibly with the violation committed and with the applicable regulations.

In the case of disciplinary proceedings, the identity of the reporting person may not be disclosed, where the objection to the disciplinary charge is based on investigations that are separate and additional to the report, even if consequent to it. If the objection is based, in whole or in part, on the report, and knowledge of the identity of the person making the report is indispensable for the defence of the accused person, the Internal Report may be used for the purposes of disciplinary proceedings only if the person making the report expressly consents to the disclosure of his or her identity. In case of refusal by the Reporting person, the Supervisory Body will file the Internal Report without following up on it.

In this latter case, notice is given to the reporting person by means of written communication of the reasons for the disclosure of the confidential data. Notice of the disclosure of the identity of the reporting person and of the information is also given when it is also indispensable for the purposes of the defence of the person involved.

The person involved can be heard, or, upon their request, is heard, also through a paper procedure through the acquisition of written observations and documents.

This procedure is without prejudice to the criminal liability of the Reporting person in the event of slanderous or defamatory reporting pursuant to the Italian Criminal Code, and the civil liability pursuant to Article 2043 of the Italian Civil Code for similar conduct committed with intent or gross negligence in relation to Reports which later prove to be unfounded.

Any form of abuse of this procedure, such as internal reports that are manifestly opportunistic and/or made for the sole purpose of harming the reported person or other subjects, and any other suggestion of improper use or intentional exploitation of the institution that is the subject of this procedure.

8. REGISTRATION, DISSEMINATION AND FILING

This Procedure is published on:

- the website www.ipackima.com
- the intranet of the Fiera Milano Group.

The internal reports received are kept for the time necessary to process the report and in any case no later than five years from the date of communication of the final outcome of the reporting procedure in compliance with the confidentiality obligations referred to in Article 12 of Legislative Decree 24/2023 and the principles referred to in Article 5, par. 1, letter. e) of Regulation (EU) 2016/679 and Article 3, par. 1, letter. e) of Legislative Decree 51/2018.

9.ANNEXES

DATA PROCESSING FOR PRIVACY PURPOSES

Privacy notice on the processing of personal data related to the operation of the whistleblowing system.

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter also the "GDPR"), provides some information regarding the processing of personal data related to the management of reports of unlawful conduct (so-called whistleblowing).

THE CONTROLLER

The Data Controller of personal data (hereinafter "Controller") is Ipack Ima Srl (hereinafter also "Company") and can be contacted in writing at:

- the registered office, located in Rho (MI), Strada Statale del Sempione, 28;
- at the email address: privacy@ipackima.it

PLACE OF DATA PROCESSING

The processed personal data are not transferred to countries outside the EU or disseminated.

TYPES OF DATA PROCESSED AND PURPOSE OF THE PROCESSING

Through the reporting channels indicated in the Whistleblowing Management Procedure adopted by the Company, the following categories of personal data may be collected:

- the reporting person's personal and contact details, if the reporting person chooses to provide them for the purpose of identifying the reporting person for the purpose of submitting the report (unless the report is submitted anonymously);
- personal data also referring to subjects other than the reporting person (such as the reported person, the facilitator and other people possibly involved in the reporting), contained in the reporting or in any case in possession of the Company and mainly relating to the relationship with the same Company (e.g. qualification, area/office to which they belong, etc.), and to the potential violations being reported (which could also concern criminally relevant conduct or the details of possible crimes).

The aforementioned personal data are processed by the Controller for purposes related to the receipt and management of the report, the carrying out of the necessary investigative activities to verify its validity and the adoption of any consequent measures provided for by the reference standards and described by the Whistleblowing Management Procedure adopted by the Company.

Where present in the report and necessary for the relevant investigation, personal data belonging to particular categories may also be acquired and processed (such as, for example, racial and ethnic origin, religious and philosophical beliefs, political opinions, membership of political parties or trade unions, as well as personal data revealing health status and sexual orientation).

It remains understood that, in accordance with the provisions of the relevant regulations, personal data which are manifestly not useful for the processing of a specific report are not collected or, if collected accidentally, are deleted immediately.

LEGAL BASIS FOR PROCESSING

For the purposes highlighted above, the processing of personal data is necessary for the fulfilment of the obligations established by the aforementioned regulations regarding Whistleblowing (Legislative Decree 24/2023 and Article 6 of Legislative Decree 231/2001, as amended by law 179/2017), to which the Controller is subject (Article 6 par. 1 letter c) GDPR)

and for the pursuit of legitimate interests (Article 6 par. 1 letter f) GDPR) connected to technical management and the security of the reporting channels, as well as the fight against any unlawful conduct (for example in violation of the Company's Code of Ethics) and the possible assessment, exercise and defence of rights in court. Any processing of personal data relating to potential criminal offences reported is carried out on the basis of the provisions in Article 10 of the GDPR insofar as authorised by specific sector regulations as above, and also to protect or defend rights in judicial proceedings (see Article 2-octies, paragraph 2, letter e) of Legislative Decree 196/2003 - "Privacy Code"), while the processing of special data is carried out only where it is necessary for the management of the report based on the aforementioned regulations and for the purpose of ascertaining, exercising or defending a right in court (pursuant to Article 9 , paragraph 2, letters b), f) and g) of the GDPR).

RETENTION TIMES

To pursue the above purposes, the processed data are kept for a period of no less than five years from the date of closure of activities to manage reports, in such a way as to guarantee the confidentiality and protection of personal data, and to be able to reconstruct the entire dossier if required. In the event of defence investigations by the company (the controller) or investigations and inspections by the judicial authorities or judicial police, as well as in the event of litigation or proceedings, this deadline may be extended until the conclusion of such activities or proceedings. If, as a result of the aforementioned assessments, the report is not followed up, the data will be retained for one year after being collected.

RECIPIENTS OF DATA

Personal data are processed by the Supervisory Body and, if necessary, by other corporate bodies, and by Company personnel authorised and trained for this purpose, or by external parties, acting as data processors, who support the Company in carrying out certain technical, investigative, organisational and consultancy activities. In addition, where necessary, personal data may be disclosed to the judicial authorities, the police, or other public and/or private entities entitled to receive them in accordance with current legislation.

PROCESSING METHODS

Personal data are processed using mainly automated methods and with organisational and processing logics strictly related to the above-mentioned purposes and in any case in such a way as to guarantee the security, integrity and confidentiality of the data in compliance with the organisational, physical and logical measures provided for by provisions in force.

RIGHTS OF DATA SUBJECTS

Each data subject (the reporting person, the reported person etc.), has the right to obtain from the Company, in the cases provided for, access to the data concerning him/her and to obtain a copy of said data, to rectify or supplement them if they are inaccurate or incomplete, to erase them or to obtain the restriction of their processing if the conditions are met, and to object to their processing for reasons relating to his/her particular situation. As regards data subjects other than the reporting person, it should be noted that the exercise of the aforementioned rights may be restricted pursuant to Article 2-undecies(1)(f) of the Privacy Code, if the exercise of such rights may actually and concretely prejudice the confidentiality of the reporting person's identity.

Data subjects may contact the Data Protection Authority, also by filing a complaint where deemed necessary, to protect their personal data and rights.

CONTACTS

In order to exercise the aforementioned rights and for any further information concerning the processing of personal data, data subjects may contact the Controller at the addresses given in the first paragraph of this document.

