

GIFLOR SRL is aware of the importance of the implementation of appropriate reporting channels in order to protect the integrity of the Company and to guarantee compliance with the principles of lawfulness, fairness and transparency, also towards third parties, in the exercise of corporate activities. GIFLOR SRL has proceeded with the activation of appropriate corporate reporting channels in accordance with Legislative Decree no. 24/2023, implementing EU Directive 2019/1937.

With this Notice, GIFLOR SRL intends to promote the widest circulation among all Recipients of any useful information on the channels, procedures and prerequisites for making both internal and external reports.

WHO CAN MAKE A REPORT

Those who work in the company as:

- **employees;**
- **self-employed workers and collaborators** who perform their work at the Company;
- **freelancers and consultants** who perform their activities at the Company;
- volunteers and trainees, paid and unpaid, who perform their activities at the Company;
- persons with **functions of administration, management, control, supervision or representation**, even when such functions are performed on a purely de facto basis, at the Company, **even when the legal relationship has not yet begun**, if the information on violations was acquired during the selection process or other pre-contractual stage or **during the probationary period or after the termination of the legal relationship** if the information on violations was acquired during the course of the relationship.

WHAT BEHAVIORS CAN BE REPORTED

Significant Reports are those reports concerning conduct, acts or omissions that harm the public interest or the integrity of the Company of which the reporter has become aware **in the work context** and which consist of:

- **illicit conduct relevant under Legislative Decree No. 231/2001 and violations of the 231 Model**, such as, for example, corruptive behavior toward the Public Administration, violations of Occupational Health and Safety, and violations of Environmental regulations. It should be noted that such reports may be made exclusively through internal reporting channels;
- unlawful acts that fall within the scope of the acts of the European Union related to the following **areas**: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transportation safety; environmental protection; public health; consumer protection; privacy and personal data protection; and network and information system security;
- acts or omissions detrimental to the financial **interests of the European Union**, such as fraud, corruption and any other illegal activities related to Union expenditures;
- acts or omissions concerning the **internal market**, including violations of EU rules on **competition and state aid** as well as on **corporate taxes, free movement of goods, persons, services and capital**;
- acts or conduct that **nullify the object or purpose** of the provisions set forth in the acts of the European Union in the above-mentioned areas. This includes, for example, so-called **abusive practices** that contravene the protection of **free competition** (adoption of predatory pricing, target discounts, tying, etc.).

Reports related to an interest of a **personal nature** of the reporter that pertain exclusively to the individual working relationships, or inherent in working relationships with hierarchically subordinate figures, or to aspects of the reported person's life, without any direct or indirect connection with the company's business and/or professional activities, are **excluded** from the scope of the discipline.

Also **excluded** are reports that are **clearly unsubstantiated**, information that is already totally **in the public domain**, information acquired only on the basis of indiscretions or rumors that are scarcely reliable (so-called **rumors**) or that are specious, **defamatory**, slanderous or aimed solely at harming the whistleblower.

The above "excluded reports" are, therefore, not considered whistleblowing reports and, therefore, the company will deal with them according to its internal company regulations.

REPORTING CHARACTERISTICS

In order to enable adequate verification activities, it is necessary for the report to be as **detailed** as possible to allow the reconstruction of the fact and the determination of the validity of what was reported. In particular, the following should be indicated:

- The **identifying data** of the reporting person (first name, last name, place and date of birth) and in the case of the use of **telephone lines** or **face-to-face** meeting, an address where to receive acknowledgement of receipt of the report and subsequent feedback, as well as any requests for additions and clarifications;
- the **circumstances of time and place** in which the fact that is the subject of the report occurred and, therefore, a **description of the facts** that are the subject of the report, specifying the details relating to the circumstantial news and where present **also the manner in which the facts that are the subject of the report came to light**;
- **personal details** or other **elements** that enable the identification of the person, if any, to whom the reported **facts** can be attributed;
- any attached **documents**;
- any **persons** potentially aware of the facts.

In the case of **anonymous reports**, it is specified that they will be considered and treated as ordinary reports **only** if they are accurate, substantiated and supported by appropriate documentation, even with the same internal procedures provided for whistleblowing reports.

INTERNAL REPORTING CHANNELS

In order to enable the transmission of **written and oral** Reports, the Company, in consultation with trade **union** representatives or organizations, activates and keeps open the following reporting channels:

a) **Channel for written reports:**

- I. Online Platform <https://giflor.signaletic.it>

b) **Channel for reports in oral form:**

- I. Online platform <https://giflor.signaletic.it>
- II. **Telephone lines** operating Monday through Friday and from **9 a.m. to 6 p.m.**, at **328 7514819 - 327 3240442** with forwarding to the Channel Managers.

In order to ensure confidentiality, the whistleblower must immediately notify that he/she intends to make a "**Whistleblowing Report.**"

If requested by the reporter, a **direct meeting** with the Channel Manager can be arranged. The direct meeting is held **only** by the Channel Manager in a confidential way and through the drafting of the whistleblowing form.

GIFLOR SRL, in full compliance with the Whistleblowing Decree, guarantees that the aforementioned channels ensure the confidentiality of the **identity** of the **reporting person**, the person involved and the person in any case **mentioned** in the report, as well as the **content** of the report and related **documentation**.

The management of the reporting channel is entrusted to Mr. Borsato Marco and Mr. Dalla Fontana Denis (the "**Channel Managers**").

REPORTING MANAGEMENT PROCEDURES

The Channel Manager, upon receipt of the report, performs the following activities:

- sends to the reporting person an **acknowledgement of receipt** of the report **within seven days** from the date of receipt;
- maintains **contact** with the reporting person and may request **additional information**, if necessary;
- duly **follows up** on the reports received by activating the persons in charge of handling the report, e.g., the SB for 231 reports;
- provides feedback to the reporting person **within three months** from the date of the notice of receipt or, in case there is no such notice, within three months from the expiration of the seven-day period from the submission of the report. Such acknowledgement may also be interlocutory in nature if the investigation has not yet been completed. Once the investigation is completed, the results must still be communicated to the reporting person.

For the **appropriate processing** of the report, internal or external parties may be involved, in view of the specific technical and professional skills required, who do not have a conflict of interest and who will in any case be bound by the obligations of confidentiality provided for in the regulations.

At the outcome of the investigation, if the report proves to be grounded, the Manager of the reporting channel will refer to the competent internal bodies/functions for the relevant follow-ups for the purpose of activating preventive, corrective or disciplinary actions against the reported person.

THE EXTERNAL REPORTING CHANNEL (ANAC)

Some conditions must be met in order to access the reporting channel established by ANAC. In particular, the whistleblowers may only resort to the external procedure if one of the following conditions is met: the company's internal reporting channel is not active in their work context or, even if activated, does not comply with Legislative Decree No. 24/2023; they have already made an internal report and the same has not been followed up; they have grounds to believe that, if they made an internal report, the same would not be effectively followed up or the same report may result in the risk of retaliation; they have grounds to believe that the violation may constitute an imminent or obvious danger to the public interest. Any retaliation suffered may be reported to the same channel (cf. <https://www.anticorruzione.it/-/whistleblowing>).

Data will be processed in accordance with the provisions of GDPR No. 679/2016 and Legislative Decree No. 24/2023; cf. **[Privacy Whistleblowing]**.

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