

## Whistleblowing procedure (update December 15<sup>th</sup>, 2023)

The Sogefi Code of Ethics defines the behaviours expected from its employees in internal and external commercial, relational and financial transactions.

This code has been communicated to everyone to avoid any inappropriate behaviour. It is founded on the personal integrity of each individual and on the collective determination to behave ethically.

As part of this collective responsibility, any employee of the Group who is aware of:

- A violation of the existing laws applicable in each country,
- A violation of the Sogefi Code of Ethics and / or any other internal rule /procedure in force within the Group,
- Any acts that may cause serious harm to the company or to the public interest,

may decide to alert the company's management by:

- following the internal procedure for alerting designated persons,
- sending an email to the special designated Sogefi mail.

Any violation or suspected violation of the law or the Code of Ethics or any other internal rule /procedure in force within the Group, as well as any acts that may cause serious harm to the company or to the public interest must be reported in the interest of the company itself.

• These two mechanisms were designed so that persons are free to bring to the Company's attention any acts or behaviours that are not in line with the values of the Group as described in its Code or any acts that may cause serious harm to the company or to the public interest.

Sogefi is committed to ensuring that no employee shall be punished, dismissed or subjected to any discriminatory measure because they testified in good faith or because they related these actions.

However, any person making malicious, abusive or defamatory use of these mechanisms will be subject to disciplinary sanctions and to legal action in accordance with the rules of his/her country.

• It is preferable and ethical for a whistle-blower casting doubt on behaviours attributed to named persons to identify himself/herself. His/her identity shall be kept confidential unless a court ruling compels the Company to disclose it. Alternatively, it is also possible to send anonymous reports.

• These whistleblowing procedures are complementary mechanisms offered to employees and should not, therefore, be viewed as substitutes for existing channels in observance of the applicable rules in each country (including employee representatives, statutory auditors and competent public authorities).

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Società soggetta all'attività di direzione  
e coordinamento di CIR S.p.A.

- The Company is entitled to spontaneously open investigations into employee adherence to its Code of Ethics.
- Once revealed, any violation of its Code, regardless of the way in which it was brought to light, is subject to disciplinary action by Sogefi. The sanctions may include, among other things, a warning issued to the employee or his/her termination, based on the severity of the violation and the applicable laws and rules.

### **Alert procedure**

Any Group employee who is aware of:

- A violation of the existing laws applicable in each country
- A violation of the Sogefi Code of Ethics and / or any other internal rule /procedure in force within the Group - Any acts that may cause serious harm to the company or to the public interest

must, preferably, refer the matter to his/her management or Human Resources Department.

Sogefi guarantees the anonymity of the employee.

The referral to management or to HR may be oral or written (letter or email).

Based on the nature and importance of the events described, Sogefi may initiate an internal investigation.

The person implicated may be notified of the procedure involving him/her.

If precautionary measures are needed, the person implicated shall be notified after these measures have been taken.

Whistleblower may choose to notify the following persons:

- His/Her manager,
- His/Her manager's manager,
- The Director General of your legal entity,
- Group HR Director,
- Chief Financial Officer
- Director of Internal Auditing
- Group CEO.

### **Whistleblowing section on company website**

Whistleblowers can access the dedicated "Whistleblowing" section in "Shareholders/Corporate Governance" area on the company website [www.sogefigroup.com](http://www.sogefigroup.com)

The content of the report will be viewed by the Head of Internal Audit and the Supervisory Body of Sogefi S.p.A.

Receipt of the report will be confirmed by the Head of internal Audit who will decide on any subsequent actions, informing the complainant within 3 months.