

# WHISTLEBLOWING GUIDELINES

## Procedure for reports of breaches of Italian Companies 231 Model and the Carraro Group Code of Ethics

**NOTE- document content:** This document is an extract from the text approved by the Carraro S.p.A. Board of Directors.

First issued: 28 January 2019

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## 1 - Introduction

Italian Law no. 179/2017 (“Provisions for the protection of whistleblowers of offences or wrongdoing which may come to their knowledge in the context of a public or private working relationship”, so-called “Whistleblowing”) amended Article 6 of Legislative Decree no. 231/2001, providing for the implementation of guarantees and protection for those who make disclosures in relation to unlawful conduct pursuant to Italian Legislative Decree no. 231/2001, or in relation to events or actions in breach of the Code of Ethics of the Group (hereinafter the “Code of Ethics” or “Code”) and the Organisational, Management and Control Models (hereinafter “Model 231”) adopted by Carraro S.p.A. (hereinafter also “Carraro”) and the subsidiary companies belonging to the Carraro Group (hereinafter the “Group”), respectively. In the light of this law, the Italian companies of the Carraro Group, having already adopted an Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 (hereinafter “231 Model”), have made amendments to said 231 Model and the Code of Ethics and have reviewed the reporting system to Supervisory Body. The foreign companies of the Group have taken steps to adapt the Code of Ethics and review the said reporting system.

## 2 - Subject and purpose of the document

To prevent and fight against unlawful or wrongful behaviour and conduct and to implement the provisions of the 231 Model on the subject of reporting channels, this procedure aims to establish a “Disclosure of wrongdoing”, “Disclosure” or “Whistleblowing” system in relation to:

- **Alleged or actual unlawful conduct pursuant to Italian Legislative Decree no. 231/2001;**
- **Alleged or actual breaches of the 231 Models and/or the Code of Ethics adopted by Group Companies.**

This procedure (hereinafter the “Procedure”) regulates the management of these Disclosures of wrongdoing through the active and available communications channels, and defines the protection that will be guaranteed to Whistleblowers in line with the current legislative provisions on the subject of Whistleblowing.

It is noted that **the management of Disclosures of wrongdoing is the responsibility of the Whistleblowing Manager.**

## 3 - Field of Application and definitions

The Procedure applies to Carraro S.p.A. and all of its subsidiaries, registered in Italy or abroad, belonging to the Carraro Group, without prejudice to any specific laws regulating the same subject at a local level which may contrast with this Procedure.

In particular, the **Recipients of the Procedure** are:

- **for Companies registered in Italy (which have adopted a 231 Model and the Code of Ethics):** the **Recipients of the 231 Model** approved by the individual companies, as identified by the Model, and, more precisely, the corporate bodies and their members, employees and collaborators (including contract workers), agents, brokers and dealers of the Company, consultants, contractors as well as members of the Supervisory Bodies that do not belong to the aforementioned categories; and the Recipients of the Code of Ethics as defined below.

- for **foreign Companies** (or any Companies that have only adopted the Code of Ethics): the **Recipients of the Code of Ethics**, namely the members of the corporate bodies, employees, contract workers, agents, consultants, contractors and suppliers of the Company.

The **Definitions** used in the Procedure are provided below.

Term	Description
<b>Company</b>	A company of the Carraro Group, registered in Italy or abroad, to whom this Procedure applies
<b>231 Model</b>	Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 adopted by the Companies registered in Italy
<b>Code of Ethics</b>	The Code of Ethics adopted by the Companies of the Carraro Group containing the ethical duties and responsibilities to be observed when carrying out corporate business and activities, which must be observed by all Recipients in the performance of their working activities
<b>Whistleblower</b>	Recipient of the 231 Model and the Code of Ethics
<b>Alleged Subject</b>	The person implicated in the Disclosure of wrongdoing
<b>Disclosure of wrongdoing ("Disclosure")</b>	Report submitted by the Whistleblower, either anonymously or otherwise, in writing, through the reporting channels provided for by this Procedure, of unlawful conduct pursuant to Italian Legislative Decree no. 231/2001 or alleged or actual events in breach of the 231 Model and/or the Code of Ethics which have come to light in the context of a working relationship
<b>Whistleblowing Manager</b>	<p>The Whistleblowing Manager is the person who:</p> <ul style="list-style-type: none"> <li>- receives the Disclosures of wrongdoing; and</li> <li>- is responsible for supervising the management of Disclosures of wrongdoing according to the provisions of this Procedure.</li> </ul> <p>The role of Whistleblowing Manager is assigned, for:</p> <ul style="list-style-type: none"> <li>- <b>Carraro S.p.A. and the foreign Companies</b> (or in any case the Companies that have only adopted the Code of Ethics), to the <b>Supervisory Body of Carraro S.p.A.</b>;</li> <li>- the <b>Italian Companies that have adopted the 231 Model</b>, to the <b>Supervisory Body of each Company</b></li> </ul>
<b>CarraroWB</b>	Online portal used by the Carraro Group, accessible to all Recipients of the Procedure via the link available on the website <a href="http://www.Carraro.com">www.Carraro.com</a> , Corporate Governance section, and used for the submission of Disclosures of wrongdoing
<b>Anonymous Disclosure of wrongdoing</b>	Any Disclosure of wrongdoing where the details of the Whistleblower are not provided or traceable

#### 4 - Reference documents

- 231 Model adopted by the Companies registered in Italy;
- The Carraro Group Code of Ethics;
- Sustainability Policies: Anti-Corruption Policy, Human Rights Policy; Diversity Policy and Environmental, Health and Safety Policy of the Carraro Group.

## 5 - Disclosures of wrongdoing

### 5.1 Subject of the Disclosure

Whistleblowers may submit **information relative to:**

- **Alleged or actual unlawful conduct pursuant to Legislative Decree no. 231/2001 concerning any crime or attempted crime covered by Italian Legislative Decree no. 231/01.** For example: bribery of public officials or persons in public office, obstruction of the exercise of the functions of public supervisory authorities, corruption between individuals, false corporate communications, money laundering, commercial fraud, crimes relating to occupational health and safety, environmental crimes, cybercrime.
- **Alleged or actual breaches of the 231 Model and/or the Code of Ethics relating to breaches of the Model and/or the Code of Ethics** (even those not included in the types of crime covered by Legislative Decree no. 231/01).

### 5.2 Actions, facts and conduct that may be reported

For the purposes of facilitating the identification of the facts that may be subject to Disclosures of wrongdoing, **relevant conduct and/or practice may include but is not limited to:**

- the falsification, alteration, destruction or concealment of documentation;
- administrative irregularities and misconduct in the fulfilment of accounting or tax obligations or the preparation of the financial statements of the Company;
- conduct aimed at obstructing the activities of the Supervisory Authorities (e.g. failure to submit documentation, presentation of false or misleading information);
- the provision of a sum of money or other benefit to a public official or person in public office as compensation for services (e.g. facilitation of a practice) or for the performance of an act in contrast with their office (e.g. failure to submit a report in the case of tax irregularities);
- the provision or promise of money, goods, services or other benefits aimed at bribing suppliers or clients;
- the stipulation of agreements with suppliers or consultants to demonstrate non-existent services;
- the falsification of expense slips in order to create funds for unlawful activities (e.g. “inflated” reimbursement or reimbursement for non-existent trips);
- conduct constituting stock manipulation and market manipulation offences, which consists of:
  - the distribution of false information (or *information manipulation*);
  - the performance of simulated transactions or other devices such to cause a slight variation to the price of listed financial instruments (or *stock manipulation*).
- conduct in breach of Policies or Procedures of the Carraro Group (included in the 231 Model);
- conduct in breach of the regulations and Procedures of the Company (included in the 231 Model).

### 5.3 Format and minimum content of the Disclosure

Disclosures of wrongdoing must include a detailed description and any supporting documentation available in order to enable an adequate understanding and assessment of the reliability of the same. Disclosures may not concern mere suspicions or information relayed by third parties.

The Whistleblower does not need to be certain of the actual occurrence of the reported events and the perpetrator. It is sufficient that, based on the information available to them and in good faith, or on the basis of a reasonable belief based on detailed elements of fact, they deem the occurrence to be highly probable.

If the Disclosure regards possible unlawful conduct pursuant to Italian Legislative Decree no. 231/01 (crimes or attempted crimes), it must be based on facts that are both precise (not subject to interpretation) and consistent (pointing in the same direction).

The Disclosure must contain the following basic information:

- **Company:** name of the Group Company involved in the Disclosure, in the context of which the conduct and/or the events included in the Disclosure occurred or relate.
- **Whistleblower's information.**
- **Description of events:** a clear description of the events being reported, including (if known) the time and place where the offences were committed or the facts were omitted (including but not limited to contract, transaction, place, etc.);

Furthermore, the Whistleblower may also indicate the following information:

- Alleged Subject and indication of any other subjects aware of the fact and/or able to report on the facts described;
- indication of any documentation that may confirm the veracity of the facts;
- any other information that may facilitate the collection of evidence to support the reported facts.

**In order to encourage the submission of Disclosures, the Company reserves the right to accept Disclosures made anonymously**, if the Whistleblowing Manager deems that said Disclosures describe the facts and persons concerned in adequate detail. Disclosures of wrongdoing, even anonymous, which demonstrate the seriousness or credibility of the issue raised, as well as the likelihood of the fact being confirmed by reliable sources, will be considered. However, the Company requests that such Disclosures not be made anonymously in order to enable a more efficient verification process.

#### **5.4 Prohibited Disclosures: conduct that may not be reported**

The Disclosure may not assume an offensive tone or contain personal insults or moral judgements aimed at offending or damaging the honour and/or personal and/or professional dignity of the person or persons to whom the Disclosure refers.

In particular, it is prohibited to:

- use offensive language;
- submit Disclosures with purely defamatory or slanderous aims;
- submit Disclosures referring exclusively to aspects of private life, without any direct or indirect link to the business and/or professional activity of the Alleged Subject;
- submit Disclosures of a discriminatory nature, concerning sexual orientation, religious or political beliefs or the race or ethnic background of the Alleged Subject;
- submit Disclosures with the sole aim of damaging the Alleged Subject;
- submit Disclosures containing personal grievances.

In the case of submission of Prohibited Disclosures, the confidentiality of the Whistleblower and the other measures implemented by the Company to protect the Whistleblower (indicated in paragraph 7.1) cannot be guaranteed.

Specifically, therefore, the Whistleblower must be aware that:

- the Disclosure of wrongdoing must not contain accusations that the Whistleblower knows to be false, and in general, the Disclosure may not be used to offend and/or cause prejudice to the Alleged Subject;
- the Disclosure does not guarantee any protection to the Whistleblower in the case that the Whistleblower is complicit in the wrongdoing;

- the Whistleblower may be held criminally and civilly liable in the case of defamatory or libellous reports, reports made with wilful or gross negligence, opportunistic reports and/or reports made with the sole aim of harming the Alleged Subject.

## 6 - MANAGEMENT PROCESS FOR DISCLOSURES OF WRONGDOING PURSUANT TO ITALIAN LEGISLATIVE DECREE NO. 231/2001

The management process for Disclosures of wrongdoing is described below.

### 6.1 Submission of Disclosures through established channels

**Disclosures may be reported exclusively through one of the two channels** described below.

- **Online portal (CarraroWB) (preferred option)**

The Disclosure may be made using the online portal CarraroWB, accessible to all recipients of the 231 Model and the Code of Ethics via the link available on the website [www.Carraro.com](http://www.Carraro.com), Corporate Governance section.

**This is the preferred option, as it guarantees the maximum level of privacy and protection for the Whistleblower.**

For these reasons, the portal is hosted and managed by an external third-party provider, independent of the Carraro Group. No employee or collaborator of any Group Company has access to the portal as a system administrator.

Only in the cases explicitly referred to in paragraph 7.3 may the confidentiality of the identity of the Whistleblower be compromised.

The Whistleblower accesses the portal by filling in a standard form, indicating the basic elements required to make a correct disclosure (to be completed in Italian or English), some of which are required (Annex 1), generating the personal login details of the Whistleblower.

If the Whistleblower provides their personal details, the identity is protected by the portal through an automatic procedure that ensures the dissociation of the personal data from the content of the Disclosure; consequently, the Whistleblowing Manager receives the content of the Disclosure but not the personal details (identity) of the Whistleblower (anonymisation of personal data). The personal login details generated at the time of the Disclosure are necessary in order for the Whistleblower to receive communications (messages and/or requests for clarifications or to send further information that may come to their knowledge to support the events described in the Disclosure). Lost login details may not be recovered or duplicated in any way. In this case, the Whistleblower must request new login details.

In order to enable the reported events to be investigated, the *CarraroWB* portal enables the establishment of a private “conversation” between the Whistleblower and the Whistleblowing Manager, as well as the submission of supporting documents.

The platform features access profiles and mandatory authentication and serves as an electronic record of the Disclosure, guaranteeing the traceability of the management procedure.

In the form, the Whistleblower must also identify the type of wrongdoing being reported, selecting an option from a list provided by the *CarraroWB* system. Should the Whistleblower provide their personal details, the Disclosure is not anonymous, but private (or rather, the identity of the Whistleblower is not known to the Whistleblowing Manager, except in the cases provided for by paragraphs 5.4 and 7.3).

- **Other channels (paper)**

It is also possible to submit Disclosures in writing, addressed the Whistleblowing Manager of the Company to which the Disclosure refers, to the postal address of the Company (for Italian Companies: Carraro S.p.a. and Carraro Drive Tech S.p.A., via Olmo 37, 35011 Campodarsego, Padua, Italy; SIAP S.p.A., via Monfalcone 4, 33085 Maniago, Pordenone, Italy; for foreign Companies: Carraro S.p.a., Via Olmo 37, 35011 Campodarsego, Padua, Italy), or by delivery in person to the Whistleblowing Manager (sealed envelope bearing the words "For the attention of the Supervisory Body of Carraro Spa" or another Company).

Should the Disclosure be submitted by post, it is prohibited for anyone other than the Whistleblowing Manager to open the envelope. In this case again, the standard form must be used, indicating the required elements for a correct disclosure (Annex 1) in Italian or English. A contact number and/or email address (preferred) is required to allow the exchange of information with the Whistleblower.

## 6.2 Receipt of the Disclosure

Depending on the channel chosen, the receipt and registration procedures are as follows:

- a) Disclosures received through the portal (CarraroWB): the Disclosure is automatically registered in the portal. The Whistleblower receives an automatic notification confirming the correct submission of the Disclosure.
- b) Disclosures submitted in writing: the Whistleblowing Manager manually enters the Disclosures into the portal (in a manner that guarantees the traceability of the Disclosure).

The responsibility of the Whistleblowing Manager to review and assess the Disclosures ensures that they are received, reviewed and assessed by an autonomous and independent person in relation to the Alleged Subject.

In the case that the Whistleblowing Manager is the Alleged Subject of the wrongdoing or should the Whistleblowing Manager have an interest in the Disclosure such to compromise impartiality or independence of judgement, in the case of a Board of Directors, the member in question must abstain from expressing an opinion on the Disclosure. In the case of a Sole Shareholder, the management of the Disclosure shall fall to the Chairman of the Board of Directors of the Company.

## 6.3 Preliminary assessment and classification of the Disclosure

The Whistleblowing Manager promptly carries out a preliminary assessment of the Disclosure (so-called "preliminary assessment"), if necessary, asking the Whistleblower to provide further information and/or supporting documents (using the features of the *CarraroWB* portal).

Following the preliminary assessment, the Whistleblowing Manager classifies the Disclosure into one of the following categories:

- a) **Not relevant**: Disclosure that does not fall within the scope of application of the Procedure (e.g. the Disclosure refers to persons, companies and/or facts, actions or conduct not covered by the Procedure). In the case that the Disclosure is deemed to have sufficient grounds and is sufficiently detailed yet is not relevant for the purposes of the Procedure (for example, it does not concern an offence and/or a breach of the 231 Model or the Code of Ethics), the Whistleblowing Manager may choose to bring the Disclosure to the attention of the Chief Executive Officer and/or the Human Resources Department of the relevant Company



and/or the Department/Area Manager to which the Disclosure refers (e.g. in the case of Disclosure referring to management aspects).

**b) Relevant but not pursuable:** Disclosure falling within the scope of application of the Procedure but which, due to the absence of certain information and/or elements with regard to subject and/or content, may not be investigated further.

**c) Prohibited:** Disclosure falling into the cases described in paragraph 5.4.

The Whistleblowing Manager may decide to i) bring the Prohibited Disclosure to the attention of the Human Resources Department of the relevant Company in order to implement the necessary disciplinary proceedings and ii) inform the Alleged Subject of the existence of the Prohibited Disclosure. In the case that the Whistleblowing Manager, including jointly with the Human Resources Manager, establishes the absence of the requirements for the implementation of disciplinary action, the Disclosure shall be duly filed.

**d) Relevant and pursuable:** Disclosure falling within the scope of application of the Procedure and sufficiently detailed. In this case, the Whistleblowing Manager begins the assessment phase described in the next paragraph.

#### 6.4 Assessment phase and internal investigations

If the **Disclosure** received has been classified as **relevant and pursuable**, the Whistleblowing Manager begins the internal assessments and investigations in order to collect further details and verify the veracity of the reported events.

The Whistleblowing Manager reserves the right to request further information or documentation from the Whistleblower, as well as to involve the Whistleblower in the investigation.

In the context of the investigation, the Whistleblowing Manager may seek assistance from company departments/units and/or external consultants.

In such circumstances, the parties involved in the investigation are required to observe the Procedure, including the obligation of confidentiality. If the parties have violated the principles defined by the Procedure, the Company may implement the measures indicated in the disciplinary system set forth in the 231 Model or the Code of Ethics.

#### 6.5 Conclusion of the assessment phase

The assessment phase is concluded with the formalisation of the relative results/observations obtained, including any actions to be taken in relation to each observation/finding.

Should the Whistleblowing Manager not find support for the veracity of the wrongdoing described in the Disclosure and/or any other breach pursuant to the 231 Model or the Code of Ethics, the Disclosure shall be duly filed.

#### 6.6 Reporting to senior management

At the end of the assessment process, the Whistleblowing Manager considers the need to promptly inform the Board of Directors of the relevant Company should critical elements come to light, particularly if related to confirmed cases of wrongdoing.

## 6.7 Relevant and pursuable Disclosure concerning senior management

In the case of a relevant and pursuable Disclosure concerning a subsidiary company, the Whistleblowing Manager shall involve a senior executive of said Company who is not involved or implicated in the Disclosure.

## 6.8 Filing the Disclosure

Making use of the portal, the Whistleblowing Manager is responsible for filing and storing all supporting documentation for a period of 10 years.

# 7 - General principles and protection

## 7.1 Protection of the Whistleblower

The correct management of the Whistleblowing system is aimed at promoting a culture of ethics, transparency and lawfulness within the Company and the Carraro Group.

This goal can only be achieved if Whistleblowers have access to dedicated channels of communication, as well as the certainty of immunity from reprisals from colleagues, managers or other Company representatives, and are certain that their report will not go unheard.

To this end, the Company protects the Whistleblower by guaranteeing confidentiality of identity and expressly prohibiting direct or indirect retaliatory or discriminatory practices for reasons directly or indirectly related to the Report.

Such conduct in breach of the measures to protect the Whistleblower, such as the adoption of discriminatory or retaliatory practices towards the same, shall result in the perpetrator of said practices becoming subject to disciplinary action.

The retaliatory or discriminatory dismissal of the Whistleblower is invalid. Similarly, any changes to the duties of the Whistleblower are prohibited, as are any retaliatory or discriminatory practices adopted towards the Whistleblower as a result of the Disclosure of wrongdoing. It is the responsibility of the Company concerned to prove the extent to which the discriminatory or retaliatory practices, if any, were taken not as a result of the Disclosure.

In the case that the reported events prove unsubstantiated and/or inconsistent on the basis of the assessments and investigations carried out, if the Disclosure was made in good faith the Whistleblower shall not be penalised. Conversely, if the Disclosure is found to be unsubstantiated, the Whistleblower may be penalised if the Disclosure was made with wilful or gross negligence. In this case, the Company shall apply the measures indicated in the 231 Model/Code of Ethics to the Whistleblower, while the accused party shall be presented with the evidence of said procedure in order that they may defend themselves in the appropriate contexts.

Furthermore, the Disclosure constitutes just cause for the revelation of information covered by non-disclosure obligations (including professional, official, scientific or industrial secrets) or the obligation of the employer to refrain from disclosing information concerning the organisation and its business methods<sup>1</sup>.

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<sup>1</sup> Articles 326 (Disclosure and use of official secrets), 622 (Disclosure of professional secrets) and 623 (Disclosure of scientific and industrial secrets) of the Italian Criminal Code and Article 2105 (Loyalty obligation) of the Italian Civil Code.

## 7.2 Protection of the Alleged Subject

In order to prevent any abuse of the Whistleblowing system and to prevent accusations, defamations or the disclosure of sensitive personal data of the Alleged Subject which could result in discrimination, retaliation, damage to reputation or other disadvantages to the same, the Procedure provides for a series of measures to protect the Alleged Subject.

To this end, as provided for by paragraph 5.4, offensive, defamatory or libellous Disclosures for which the Whistleblower may be held criminally or civilly liable are prohibited.

Decisions regarding any disciplinary action, complaints or other measures to be implemented following the outcome of the investigations carried out, are taken by senior management and in any case by parties not involved in the investigations, in order to avoid any conflicts of interest or lack of impartiality.

## 7.3 Confidentiality of the Disclosure

The Company guarantees the confidentiality of the Disclosure, its contents, the identity of the Whistleblower (in the case of non-anonymous Disclosures) and the Alleged Subject, as well as any supporting documentation.

Therefore, the available information may not be disclosed to parties not directly involved in the assessment and investigation process.

All parties involved in the management of the Disclosure must observe its confidentiality.

The confidentiality of the Whistleblower cannot be guaranteed when:

- the Whistleblower has given explicit consent for the disclosure of their identity;
- a first-level judgment has been passed regarding the criminal liability of the Whistleblower for crimes of libel or defamation or offences committed with the Disclosure, or civil liability in the case of Disclosures made with wilful or gross negligence;
- the identity of the Whistleblower is requested by Legal Authorities in relation to their inquiries (criminal, legal or administrative inquiries, inspections by control bodies, etc.).

Exclusively in the cases described above and in the case of Prohibited Disclosures (paragraph 5.4), the Company may request that the external provider responsible for managing the portal “re-combine” the personal data (identity of the Whistleblower) and the content of the Disclosure. The process through which the identity of the Whistleblower may be requested is regulated by internal Company’s regulation.

## 7.4 Processing of personal data

It is noted that the personal data of the Whistleblower, the Alleged Subject and all other parties involved in the Disclosure is processed in accordance with current data protection law pursuant to Regulation (EU) no. 2016/679 and Italian Legislative Decree no. 196/2003, as amended.

In particular, it is noted in this context that:

- the Whistleblower will receive, upon submission of the Disclosure, a notification specifying, *inter alia*, the purposes and methods of the processing of personal data, the recipients of the personal data disclosed in the management of the Disclosure, the transmission of said data to EU or extra-EU countries and the rights of the Whistleblower with regard to the personal data processed;

- pursuant to the Whistleblowing system, only personal data that is necessary and relevant to the purposes for which it was collected may be processed;
- the disclosure of personal data is optional, and failure to disclose such data may result in the impossibility of proceeding with the review and management of the Disclosure;
- adequate technical and organisational measures are adopted such to guarantee the security of personal data in accordance with current legislation;
- on the subject of the right to restriction of processing by the Whistleblower or the Alleged Subject (“concerned” parties pursuant to the Privacy Law), in relation to the personal data processed in the context of the Whistleblowing procedure, under no circumstances does the Alleged Subject have the right to obtain information regarding the identity of the Whistleblower.

### **7.5 Restricted actions of the Whistleblowing Manager**

The Whistleblowing Manager, in the context of the management process for Disclosures of wrongdoing, according to current legislation:

- MAY NOT protect individual rights and interests;
- MAY NOT make subjective or personal assessments/decisions regarding the Whistleblower;
- MAY NOT replace the competent authorities;
- MAY NOT provide advice to the Whistleblower.

## **8 - Training and Information**

The Carraro Group recognises that employee training and information on the subject of Whistleblowing are fundamental to the implementation of the Procedure. The Procedure is available online at the website [www.Carraro.com](http://www.Carraro.com), Corporate Governance section, and on the *CarraroWB* portal.

## **9 - Breaches of this Procedure**

Any breach of this Procedure may constitute disciplinary wrongdoing punishable by the Company, in line with the provisions of the Disciplinary System of the 231 Model or the Code of Ethics.

In particular, it is noted that, in order to guarantee the protection of the Whistleblower, retaliatory or discriminatory acts brought against persons who have reported an offence pursuant to Italian Legislative Decree no. 231/2001, or a breach of the Model or the Code of Ethics, or breaches to the obligation of confidentiality of the identity of the Whistleblower, are punishable under the Disciplinary System provided by the 231 Model.

In the case that the Disclosure proves to be unsubstantiated or is made out of wilful or gross negligence, the Disclosure may constitute a disciplinary offence punishable by the Company in line with the Disciplinary System of the 231 Model or the Code of Ethics.

## **10 - Appendices**

<b>Annex 1:</b> Breach Reporting form (version: Italian and English)
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