

01. WHAT IS “WHISTLEBLOWING”?

The so-called "Whistleblowing" is an instrument of Anglo-Saxon origin through which individuals belonging to an organization, public or private, report to specific individuals or bodies a violation, a crime or an illicit act, committed by other individuals belonging to the organization. A Whistleblower is, literally, the one who blows the whistle, that is, the "Reporter": the one who reports violations, from which the term Whistleblowing derives.

02. WHAT IS THE PURPOSE OF THE WHISTLEBLOWING POLICY ADOPTED BY GI GROUP HOLDING?

The purpose of the Whistleblowing Policy is to set out the operational process for the management of Reports and any ensuing investigations into unlawful conduct based on precise and concordant factual elements of which the Whistleblowers have become aware by virtue of their duties, and to inform the Whistleblower of the forms of protection and confidentiality afforded to him/her.

The rules and principles contained in the Whistleblowing Policy do not prejudice or limit in any way the obligations and rights to report to the competent Authorities (Judicial, Supervisory or regulatory), but aim to strike a fair balance between the legitimate interests of Gi Group Holding in preventing misconduct and the fundamental rights of its employees and in general of the addressees of the policy (internal and external Stakeholders), in particular with regard to the processing of personal data concerning them.

The Whistleblowing Policy descends directly from Code of Ethics and represents how the Group pursues its values about the topics of Responsibility, Transparency and Legality.

The Whistleblowing Policy has been issued by Gi Group Holding S.p.A. (also the "Parent Company") and it applies to all the companies directly or indirectly controlled by it, or to its affiliates, in Italy and worldwide (hereinafter referred to as "Gi Group Holding" or simply the "Group's Companies").

03. HOW CAN I MAKE A REPORT?

The Whistleblowing Policy provides for the following reporting channels:

- **in written form**, through the specific IT Channel named [Gi Group Holding Reporting Channel](#), with which Gi Group Holding have equipped itself, by accessing the specific link publicly available on the website www.gigroupholding.com. The tool provides the option of several languages to choose from.
- **in written form**, by means of a paper letter delivered by hand or by regular **post service** to: *Global CSR Team "For the whistleblowing reporting officer's eyes only" - Gi Group Holding CSR Team - piazza IV Novembre 5 - 20124 Milan - Italy*. If this channel is chosen, the Report must be placed in three sealed envelopes:
 - the first with the identifying data of the Reporting Person, who must expressly declare that he or she wishes to benefit from the protections in the whistleblowing field or make this wish inferable from the Report, together with a photocopy of the identification document;

- the second with the Report, in order to separate the identifying data of the reporting person from the Report;
- both envelopes must then be placed in a third envelope where further documents suitable for providing elements of substantiation of the reported facts may also be placed.
- **verbally**, throughout the [Gi Group Holding Reporting Channel](#), which also gives the possibility to Report verbal Violations;
- **verbally**, upon express request addressed to the Reporting Officer by means of an in-person (physical or remote) meeting to be held within a reasonable period of time (possibly defined by locally applicable regulations). In this case, the Whistleblower will be informed that the documentation and/or recording (with his/her consent) of the meeting or telephone conversation will be retained and processed according to applicable laws.

The Global CSR Team (CSRT) also remains contactable for the management of Reports and complaints at the addresses indicated in the [Gi Group Holding Code of Ethics](#).

However, due to the high degree of confidentiality protection afforded to the Whistleblower through the [Gi Group Holding Reporting Channel](#), it is advisable to make the Report through the IT channel and to make use of alternative modalities as a subordinate means.

An individual who receives a Report outside the [Gi Group Holding Reporting Channel](#) must ensure the confidentiality of the information received, being bound not to disclose the identity of the Whistleblower, the Reported Person or any other person mentioned in the Report, or any information that would allow them to be identified and shall direct the Whistleblower to comply with this Policy and/or forward the Report using the reporting Channel.

04. WHAT CAN BE REPORTED?

The **actions or omissions committed during the course of business or in connection therewith**, by any person within Gi Group Holding, on its behalf or in dealings with Gi Group Holding that have occurred or may reasonably be expected to have occurred and that consists or may consist in:

- criminal activity (crime or offence);
- a serious and obvious violation of the laws and of other applicable regulations, at all levels (local, regional, national, international), valid in the single countries where each Group's Company operates, notwithstanding any specific limitations defined by locally applicable regulations;
- conduct or a situation contrary to the Gi Group Holding Code of Ethics and all related Global High-Level Policies in place;
- lack of equity, inclusion or discrimination related (but not limited) to gender equality, including conduct such as harassment, bullying, mobbing;
- unfair labour/business practices (e.g. corruption, bribery, abuse of power, ...);
- unlawful working conditions (e.g. child labour, modern slavery, payroll fraud,...);
- a serious violation, potential or actual, relating to the areas of health, safety or the environment;
- a situation that could threaten or cause serious damage to the public interest (e.g. relating to public health and safety);
- an act of retaliation;

- any violation considered as such by applicable local Whistleblowing Laws.

Making a Report consists of disclosing/reporting, disinterestedly and in good faith, information regarding a violation. Reports are discouraged (and will therefore be rejected) when:

- relating to situations of a personal nature or concerning claims or grievances about relations with hierarchical superiors or colleagues;
- based on mere suspicions or rumours concerning personal facts not constituting an offence.

The Report must be circumstantiated, i.e. made with a sufficient degree of detail to enable the facts reported to be ascertained, and contain the following elements:

- name of the Whistleblower and relevant contact details for further communication (without prejudice to the possibility of submitting an anonymous Report);
- detailed description of the fact reported;
- subjects (natural or legal persons) involved;
- the circumstances under which the fact came to the knowledge of the person concerned;
- any other persons who may report on the fact and their particulars;
- documents or other elements that may prove the fact reported.

05. WHO CAN MAKE A REPORT THROUGH ONE OF THE DESCRIBED CHANNELS?

All internal and external Stakeholders may make a Report, such as:

- personnel of the Group's Companies: the term "personnel" refers to all individuals employed or contracted by the Group, including but not limited to directors, executives, shareholders, other members of the corporate and supervisory bodies, management, permanent and non-permanent employees, workers and contract workers and, for the scope of this Policy, also former employees and applicants,
- collaborators, volunteers and trainees,
- as well as to third parties acting on its behalf or who in any case obtain information through their professional and work activities at Gi Group Holding and/or at the Companies of the Group (for example: consultants, employees, collaborators, members of corporate and supervisory bodies and shareholders of customers, suppliers, sub-suppliers, business partners),
- legitimate bearers of an interest in the Group's Companies' business.

06. WHO WILL HANDLE THE REPORT?

The Report will be handled by the **Reporting Officer** who is a member of the Global CSR Team, specifically charged with supervising the Gi Group Holding Reporting Channel, taking charge of the Reports, starting the verification and management process, proposing the involvement of appropriate **Competent Persons**. Depending on the content of the Report, the Reporting Officer may also take the form of Competent Persons.

Competent Persons are key people necessary for an effective investigations and resolution of the Report, involved by the Reporting Officer on the basis of his/her competences, skills or

organizational position, in relation to the content of the Report received. They may be invited to work directly on the Gi Group Holding Reporting Channel, limited to the handling of complaints for which they are responsible.

07. HOW LONG DOES IT TAKE FOR THE WHISTLEBLOWER TO RECEIVE A RESPONSE?

When a Report is sent, within **7 days of its receipt**, a communication is sent to the Whistleblower confirming that the Report has been received and acted upon, unless it is not possible to contact the Whistleblower or if sending the communication would compromise the confidentiality of the information.

The verification phase must be completed **within three months** from the date of receipt of the Report (without prejudice to any local applicable regulations providing for a shorter time period), unless there are justified reasons. If the investigation has not been completed by the above-mentioned deadline, the Whistleblower is nevertheless updated as to the status of the investigation, where technically possible.

08. ARE RETALIATIONS ALLOWED FOR REPORTING?

No form of retaliation or discriminatory measure, direct or indirect, against the person who makes a Report pursuant to the Whistleblowing Policy is permitted.

Gi Group Holding shall not tolerate any kind of threat, retaliation, unjustified sanction or discrimination (such as, for example, but not limited to: dismissal, suspension, loss of benefits, unjustified transfer and mobbing) against the Whistleblower, the Reported Person, the Facilitators, the Related Persons and those who have collaborated in the activities of verification of the merits of the Report.

Please note that **Reports in bad faith** are strictly prohibited.

09. IS IT POSSIBLE TO MAKE AN ANONYMOUS REPORT?

Gi Group Holding allows, even if does not encourage the possibility of anonymous reporting, because of the possible difficulties that may be encountered during the investigation phase, and which require the cooperation of the Whistleblower.

Therefore, **anonymous Reports are allowed provided that they are sufficiently circumstantiated** and therefore contain sufficient factual elements to initiate an investigative activity.

10. IS THE CONFIDENTIALITY OF THE WHISTLEBLOWER GUARANTEED?

Gi Group Holding guarantees **absolute confidentiality** and non-disclosure of:

- the identity of the Whistleblower, the Reported Persons, the Facilitators and any other person involved; and
- each Report and of the information and the facts contained therein.

Even in the event that the latter should subsequently prove to be erroneous or unfounded, without prejudice to legal obligations. Breach of the obligation of confidentiality is a source of disciplinary liability, without prejudice to any further liability provided for by law.