



COBRAPLAST

COBRAPLAST S.P.A.
Share Capital € 260,000 i.v.
Fiscal Code/VAT Number 07716320010
Turin Companies Register no. 45304/99
R.E.A. Turin No. 914448

ADMINISTRATIVE HEADQUARTERS - ESTABLISHMENT
Via Fornacino, 119 - 10040 Leini (TO) - Italy
Tel +39 011 92.21.827

WAREHOUSE
Viale J.F. Kennedy, 22-24 -10079 Mappano (TO) - Italy
Tel +39 011 92.21.827
website: www.cobraplast.com

WHISTLEBLOWING PROCEDURE (ITALIAN LEGISLATIVE DECREE 24/2023)

This procedure applies to Cobraplast spa and is intended to implement and regulate the process of reporting violations within the scope of the activity carried out by the Company. In particular, the procedure implements the provisions of Legislative Decree No. 24 dated March 10, 2023 (the "**Whistleblowing Decree**") on the "*implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 on the protection of persons who report violations of Union law and on provisions concerning the protection of persons who report violations of national laws,*" which regulates the protection of persons who report violations of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in a public or private work context.

The disclosure is available to and known by potential interested parties through its posting on the website and posting on the company bulletin board

The policy is available to and known by potential interested parties through its posting:

- on the website www.cobraplast.com
- on the company noticeboard

This whistleblowing policy is addressed to all individuals who have a relationship with Cobraplast spa and are entitled to report any corporate offences in which they were directly involved or of which they became aware as a result of their relationship with the company.

The breaches that can be reported pursuant to the Whistleblowing Decree must relate to conduct, acts or omissions that harm the public interest or the integrity of the public administration or Cobraplast spa, of which the Whistleblower has become aware in the working environment of Cobraplast spa or as a result of existing relations with it, such as:

- 1) unlawful conduct relevant to Decree 231/2001
- 2) offences that fall within the scope of European Union or national acts (as referred to in the Whistleblowing Decree) related to the following areas:
 - a. public procurement
 - b. financial services, products and markets, prevention of money laundering and terrorist financing
 - c. product safety and compliance
 - d. transport safety
 - e. protection of the environment
 - f. radiation protection and nuclear safety
 - g. food and feed safety and animal health and welfare
 - h. public health
 - i. consumer protection
 - j. protection of privacy and personal data and security of network and information

systems.

- 3) acts or omissions harming the EU's financial interests, as set forth in Decree No. 24/2023 "Whistleblowing".
- 4) acts or omissions concerning the internal market, including breaches relating to EU competition and state aid rules, as well as breaches concerning the internal market related to acts that violate corporate tax rules or arrangements whose purpose is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law, as set forth in the Whistleblowing Decree.
- 5) acts or conduct that defeats the object or purpose of the provisions set forth in EU Acts in the areas indicated in (2), (3) and (4).

Unlawful conduct relevant under the Cobraplast spa Code of Ethics that does not fall within the offences under the Whistleblowing Decree indicated above, may also be subject to Reporting. Employees (including trainees or probationary workers, candidates for employment relationships and former employees), collaborators, shareholders, persons exercising (even on a *de facto* basis) functions of administration, management, control, supervision or representation of Cobraplast spa as well as other third parties who interact with the same company, such as suppliers, consultants, brokers, etc., are entitled to make a Whistleblowing Report pursuant to the Whistleblowing Decree.

In compliance with the provisions of Article 4 of Legislative Decree 24/2023, Cobraplast spa has activated a platform, provided by a selected partner, that applies a whistleblowing procedure complying with the EU directive (certification to ISO 27001, in compliance with GDPR).

This Whistleblowing Channel is to be understood as internal pursuant to Art. 4 of Legislative Decree 24/2023; it allows electronically sending of reports in written form and guarantees the confidentiality regarding the identity of the Reporter (Whistleblower), the person mentioned in the Report (Reported person), as well as the content of the Report and related documentation.

The platform is accessible through the Cobraplast spa website at the "Contact-Whistleblowing" section.

The person who intends to make a whistleblowing report, enters the website www.cobraplast.com and, in the website footer, by clicking <Whistleblowing> link is directed to the whistleblowing portal where the home page provides a general introduction on how the system works, how the report is handled, and how anonymity is guaranteed.

Both anonymous and non-anonymous Whistleblowing Reports may be made, at the choice of the Whistleblower.

In compliance with the provisions of Article 17 of Legislative Decree No. 24/2023, the confidentiality of the Whistleblower and its protection from any possible retaliation is ensured. The identity of the Whistleblower and any other information from which the identity can be inferred even indirectly cannot be detected without the express consent of the Whistleblower.

The Company has established as the Manager of the Internal Whistleblowing Channel a dedicated body, with members specifically trained in this regard, composed of internal and external representatives, of which the Company's legal counsel is also a member.

Internal reporting can also be done (anonymously or non-anonymously) by sending it in written mode in a sealed envelope to the Internal Whistleblowing Channel Manager, inserting the envelope in the Company "Suggestion box", or by requesting the HR Manager for a meeting with the Internal Whistleblowing Channel Manager.

Any reports regarding the Internal Whistleblowing Channel Manager should be sent, anonymously or non-anonymously, only to the administrative body of Cobraplast spa.

The Reports must be circumstantiated and based on precise elements, relate to verifiable facts of which the Reporter (Whistleblower) has become aware by reason of the functions performed or relationships.

Reports are received directly and exclusively by the Internal Whistleblowing Channel Manager, who will handle them in accordance with the provisions of Legislative Decree 24/2023 and send through the platform an acknowledgement of receipt to the Reporter (Whistleblower) within seven days of receiving the whistleblowing.

In accordance with Article 4 of the Whistleblowing Decree, a report submitted to a person other than the Internal Whistleblowing Channel Manager must be forwarded to the same within seven days, giving simultaneous notice to the Whistleblower.

The management of the report is carried out in compliance with the provisions of Legislative Decree 24/2023 through the conduct of investigations by the members of the Internal Whistleblowing Channel Manager, including by requesting – always through the platform - additional information and/or documents from the Whistleblower and/or requesting the support of corporate structures or external specialist consultants, ensuring compliance with the confidentiality requirements of the Whistleblowing Decree.

The feedback of the report shall be provided within three months from the date of notice of its receipt, even if the outcome of the investigation has established that no wrongdoing has occurred and/or the report is unfounded.

Reports (and related documents), pursuant to Article 14 of Legislative Decree 24/2023, are kept through the platform for as long as necessary to process them and, in any case, no longer than five years from the date of communication of the final outcome of the whistleblowing procedure, in compliance with the confidentiality requirements of Art. 12 of Legislative Decree 24/2023 and Principle set forth in Art. 5, paragraph 1, point e of Regulation (EU) 2016/679 and Art. 3, paragraph 1, point e of Legislative Decree No. 51 of 2018 (GDPR).

Whenever a breach is found to have been committed, the Internal Whistleblowing Channel Manager, also in order to prevent similar violations in the future, will conclude the investigation by proposing to the relevant offices:



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1. to institute sanctioning proceedings against the Reported Person, in compliance with any applicable regulations and collective bargaining;
2. to agree with the Board of Statutory Auditors, involved in particular reports, on any action to be taken, before the report is closed;
3. to agree together with the company department affected by the Violation, on any action plan necessary for the removal of the control weaknesses detected, also ensuring the monitoring of its implementation.
4. to evaluate - also together with the other relevant company departments and in compliance with the provisions of Article 16 No. 3 and Article 20 of the Whistleblowing Decree - the advisability of initiating criminal proceedings against the Whistleblower for the offenses of defamation or slander or for the same title a civil proceeding to ascertain liability for willful misconduct or gross negligence, also for the purpose of imposing a disciplinary sanction against the Whistleblower.

Notwithstanding the foregoing, the Internal Whistleblowing Channel Manager is required to provide the administrative body of the Company, every six months with a list of the Reports received and not filed, containing the results of the analysis, including whether or not disciplinary measures were taken by the Company.

The above reporting system is carried out in compliance with the confidentiality requirements of the Whistleblowing Decree.

Please note that, in the only case in which the Reporter (Whistleblower) considers it essential for the success of the report, he may turn to the external channel at ANAC [*Italian National Anti-corruption Authority - Independent Administrative Authority*], following the procedure indicated on the Authority's website: <https://www.anticorruzione.it/-/whistleblowing> referring to the guidelines and ANAC's official website.

It should also be noted that the Reporter (Whistleblower) is protected by Art. 17 of the Whistleblowing Decree from the risk of being retaliated against by the Reported Person; in accordance with Art. 21 of the same Decree, in the event of ascertained retaliation or improper handling of the report by the Internal Whistleblowing Channel Manager, sanctions are provided for against the person responsible, as well as financial penalties may be imposed, in addition to the possibility of adopting disciplinary sanctions against the Whistleblower if the same is convicted, even at first instance, of the crimes of defamation or slander.

DATA PROTECTION

The processing of personal data in the management of the Internal Reporting Channel and Received Reports must be carried out in accordance with the GDPR and the Privacy Code.

The Company has defined its model for receiving and managing internal reports, identifying technical and organizational measures to ensure a level of security appropriate to the specific risks arising from the processing performed, based on a data protection impact assessment, pursuant to Article



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35 of the GDPR.

The relationship with external suppliers that process personal data on behalf of the Company is governed by a data processing agreement, pursuant to Article 28 of the GDPR, which defines the duration, nature and purpose of the processing, the type of personal data and the categories of data subjects, and the obligations and rights of the data controller, in accordance with Article 28 of the GDPR.

Persons responsible for receiving or following up Reports under this Procedure have been authorized to process personal data related to Reports pursuant to Articles 29 and 32 of the GDPR and Article *2-quaterdecies* of the Privacy Code.

Whistleblowers and Affected Persons must be provided with appropriate information pursuant to Articles 13 and 14 of the GDPR.

With reference to the exercise of the data subject's rights and freedoms, where the same is the Person Concerned, the rights provided for in Articles 15 to 22 of the GDPR may not be exercised (by request to the Data Controller or by complaint pursuant to Article 77 of the GDPR) as the exercise of such rights could result in actual and concrete prejudice to the protection of the confidentiality of the identity of the Whistleblower (pursuant to Article *2-undecies* of the Privacy Code and Article 23 of the GDPR) and/or to the pursuit of the objectives of compliance with the legislation on reporting of unlawful conduct.

The exercise of rights by the Person Concerned (including the right of access) may therefore be performed to the extent permitted by the applicable law and following an analysis by the competent bodies, for the purpose of conforming to the need to protect the rights of individuals with the need to counteract and prevent breaches of the rules of good corporate governance or of the relevant applicable regulations.

Personal data that are manifestly not useful for the processing of a specific Report shall not be collected or, if collected, must be deleted immediately.

Cobraplast spa reserves the right, at its discretion, to change, modify, add or remove any part of this notice at any time. In order to facilitate the verification of any changes, the notice will contain an indication of the date it was updated.


COBRAPLAST S.p.A.
Managing Director
F. Lico