

# Alcantara Whistleblowing Policy

## 1. Introduction

The Toray Group Ethics and Compliance Code of Conduct (Issued May 2020) defines and lays out our values, principles and guideline for the Toray Group with regard to dealings with customers, business partners, suppliers, employees, etc.

The following rules are intended to support our employees, our managers as well as our business partners, customers, suppliers, etc. of Alcantara S.p.A. (the “Company”) in recognizing, reporting and eliminating misconducts. In addition, suggestions for improvement are also encouraged, which will help us to implement our values even better.

This Policy shows in which cases and in which way misconducts can be reported. It also clarifies how we then deal with such reports of misconducts. The reporters or whistleblowers need not fear retaliations for making a good faith report of misconducts and we also guarantee the whistleblowers maximum confidentiality.

With this Policy we want to create trust and encourage whistleblowers to cooperate. In doing so, the whistleblowers will make a valuable contribution to ensuring that together we can meet the high standards which we set ourselves.

This Policy supersedes the previous one issued in November 2019.

## 2. Definitions

### 2.1 Violation

Acts or omissions that are unlawful and may be qualified as a matter to be reported under Section 3.3 of this Policy, or that are contrary to the object or purpose of the laws, in which the matters to be reported are regulated.

### 2.2 Information about Violations

Information, including reasonable suspicion, regarding actual or potential Violations or information regarding attempts to conceal such Violations, which have occurred or are likely to occur in the Company where the whistleblower works or has worked, or with which the whistleblower is or has been in contact in a professional context.

### 2.3 Report

The oral or written submission of the Information about Violations such as:

Reports referred to corruption offenses: include not only the full range of crimes against the public administration (hypotheses of bribery for the exercise of function, bribery for an act contrary to official duties and bribery in judicial acts), but also situations in which, in the course of business activity there is evidence of abuse by a person of the power entrusted to him or her in order to obtain private advantages, as well as facts in which - regardless of the criminal relevance - a malfunction of corporate management is evidenced due to the use for private purposes of the functions assigned, including the pollution of management action ab externo. Reference is made, purely by way of example, to cases of waste, so-called nepotism, demotion,

repeated failure to comply with procedural deadlines, non-transparent hiring, accounting irregularities, false statements, falsification of data, and violation of environmental and occupational safety regulations.

Reports of violations of the Code of Ethics: are considered as such all reports concerning to the violation of the principles of the Code of Ethics of Alcantara S.p.A. in its content from time to time in force.

Reports of violation Internal Control and Risk Management System: all reports concerning non-compliance with rules provided for under the Company's internal regulatory system, including hypotheses of fraud on corporate assets and/or corporate reporting, false accounting, as well as events capable, at least in the abstract, of causing administrative liability of the Company pursuant to Legislative Decree 231/2001.

Reports of violations of antitrust and competition regulations: all reports concerning non-compliance with national and European regulations with reference to antitrust issues, competition, commercial agreements, distribution and agency, collusion in public tenders, cartel proceeding.

Preventive reporting of offenses or irregularities that may be committed: the preventive aspect of whistleblowing is essential and individuals should be encouraged to also report wrongdoing and/or irregularities that are expected to be committed (Council of Europe 2014).

Anonymous reporting: reporting in which the identity of the reporter is not made explicit, nor is it uniquely identifiable.

Bad faith reporting: report that from the results of the preliminary investigation phase is found to be groundless on the basis of objective elements proving the bad faith of the reporter, made for the purpose of causing unfair harm to the reported person. It should be noted that the regulations introduced by Law No. 179/2017 provide that the whistleblower shall forfeit all protections where in the first instance his or her criminal liability is established for the crimes of slander or defamation or in any case for crimes committed with the complaint. Alcantara S.p.A. deeming the commitment of the Company's personnel at every level to respect the dignity, honor and reputation of each person to be dutiful, (i) intervenes to prevent interpersonal attitudes that are insulting, discriminatory or defamatory or in any case carried out in bad faith; (ii) censures such conduct, both by informing the persons whose "bad faith" has been ascertained and by deciding on the imposition of appropriate disciplinary sanctions against them, without prejudice to the provisions contained, on this point, in Law No. 179/2017.

Circumstantiated reporting: report in which the narration by the author, of facts, events or circumstances that constitute the founding elements of the alleged wrongdoing (e.g. type of wrongdoing committed, reference period, value, causes and purposes of the wrongdoing, areas and persons concerned or involved, anomaly on the internal control system etc...) is made with a sufficient degree of detail to allow, at least abstractly, to identify useful or decisive elements for the purposes of verifying the merits of the report itself.

Circumstantiated reports are distinguished in turn into:

- Verifiable circumstantiated reports: if, given the contents of the report, it is possible in concrete terms, on the basis of the available investigative tools, to make checks on the veracity of the report.
- Non-verifiable circumstantiated reports: if, considering the contents of the report, it is not possible, on the basis of the available investigative tools, to make verifications on the truthfulness of the report and therefore proceed to the next stage of investigation.

## **2.4 Whistleblower**

A natural person who reports or discloses Information about Violations obtained under a professional context.

## **2.5 Professional Context**

Current or former professional activities at the Company through which a Whistleblower, regardless of the nature of the activities, obtain Information about Violations and where such Whistleblower could face retaliations for reporting such information.

## **2.6 Reported Person**

A natural person or a legal entity mentioned in a Report as a person who committed the Violation or with whom the Reported Person is associated.

## **2.7 Contact Person and Authorized Decision-Maker**

A Contact Person is an internal contact person designated by the Company to receive Reports.

An Authorized Decision-Maker is a person within the Company or within the Toray Group who has the power to take action to prosecute and punish Violations.

## **2.8 Competent Authority**

The national authority designated under applicable law of the country where the Company was incorporated to, among other things, receive Reports and provide feedbacks to Whistleblowers.

# **3. Principles**

## **3.1 Purpose**

The aim of this Policy is to establish an internal whistleblowing system that serves to uncover, clarify and correct operational misconducts, conducts detrimental to the Company or the Toray Group as a whole, white-collar crimes, infringements of applicable law, etc.

## **3.2 Right to Report**

All persons who work for the Company or who are in contact with us in the course of their professional activities or who obtain Information about a Violation in a Professional Context are entitled to make Reports. These can be, for example, the Company's full-time employees, temporary employees, contract employees, part-time employees, secondees, job applicants, potential employees, interns, former employees, officers, directors, advisory board members, (sub)contractors, suppliers and their employees.

If a person working for the Company is aware of a potential Violation and does not report it according to this Policy, such inaction may be considered a Violation itself, which may result in disciplinary action, up to and including termination of his or her employment or any other working relationship with the Company, the Toray Group or other legal proceedings.

## **3.3 Matters to be reported**

Matters to be reported are Information about any actual, suspected, or potential (i) Violations of the Toray Group's Code of Conduct, policies and procedures, and (ii) Violations of any law, including, but not limited to, the Violations of the national and/or European Union law in the following fields:

- Fraud and misconduct relating to accounting or internal accounting controls,
- Auditing offenses,
- Corruption,
- Banking and financial crime,
- Money laundering, financing of terrorist activities,

- Prohibited insider trading,
- Violations of antitrust law,
- Violations of competition law,
- Bribery, abuse of office,
- Betrayal of secrets,
- Falsification of contracts, reports or records,
- Misuse of Company assets, theft or embezzlement,
- Environmental hazards, common hazards, hazards to the health or safety of our employees, and similar cases.

The whistleblowing system should not be used, moreover, as a system for filing general complaints, for sharing opinion or personal feelings, for inquiring about product and warranty, nor for searching of help in events of immediate threat to life or property.

#### **4. Reporting procedure**

##### **4.1 Open and anonymous reporting**

All Whistleblowers are encouraged to openly and directly report any malpractices, misconducts, hazards, etc. of which they are aware within the meaning of this Policy if there is reasonable suspicion of a Violation, providing their contact details.

Alternatively, anonymous reporting is also possible at any time. Since no queries are possible in the case of an anonymous Report and trust can be impaired, anonymous Reports should only be made if the Whistleblower considers a Report attributable to him or her to be unreasonable and would like to ensure that, for example, the Reported Persons do not know about his or her identity under any circumstances.

It is important to note that this Policy does not prevent employees and managers from speaking to their supervisor or the person directly responsible for the matter to be reported. This is usually the easiest way to address a problem relating to the work environment, to clarify misunderstandings and ensure a good and open working atmosphere.

##### **4.2 Reporting channels**

Whistleblowers have various options at their disposal for submitting Reports effectively and reliably. All Reports can be made verbally (e.g., by telephone) or in writing or electronically. A face-to-face meeting for a Report can also be arranged at a Whistleblower's request.

A Report can be submitted via the internal reporting channels, i.e., to internal contacts or via a reporting hotline provided by an authorized outsourcing provider ("**Internal Reporting**").

Alternatively, the Whistleblower can also contact the responsible authority via an external reporting channel designated by the country where the Company was incorporated, such as the police or a data protection supervisory authority ("**External Reporting**").

###### **4.2.1 Internal Reporting**

Internal Reporting ensures that Information about Violations gets to the people closest to the cause of the Violation, who can resolve the Violation and take remedy measures. Therefore, Internal Reporting should preferably be the first choice of Report.

There are three alternate Internal Reporting channels, one within the Company and the other two outside the Company, including an outsourced, independent and confidential reporting hotline operated by an external

and independent firm. The representatives of all these channels are bound to confidentiality and will comply with this Policy and all relevant law and regulations when dealing with a Report.

#### 1. The Company's Contact Person

A Reporting Team (composed of Supervisory Board, Personnel Director and External Legal Advisor having the expertise in Criminal Law and experience related to the type of report) is established to handle the first stage of receiving, reviewing and evaluating reports in coordination with the Company. The following communication channels are available for reports:

1. specific whistleblowing platform <https://alcantara.segnalazioni.net>
2. Toray Group's Global Whistleblowing System – Contact Point in Europe
  - Email: [compliance.teu.mb@mail.toray](mailto:compliance.teu.mb@mail.toray) (Language accepted: English and Japanese only)
3. Toray Group's Independent Compliance Hotline in Europe
  - Email: [for example: [toray.hotline@aplav.de](mailto:toray.hotline@aplav.de)]
  - Post: Atsumi Sakai Europa Rechtsanwalts- und Steuerberatungsgesellschaft mbH, OpernTurm, Bockenheimer Landstraße 2-4, 60306 Frankfurt am Main, Germany
  - Telephone (toll-free): 00800 200 200 22 (Language accepted: English, Japanese, German, French or Spanish)

\*The Independent Compliance Hotline telephone number(s) is available from 9:00 to 17:00 from Monday to Friday (except for national holidays in the State of Hesse, Germany). Out of this time frame, Whistleblowers can dial the Compliance Hotline telephone number(s) and record their Reports as instructed by the automatic answering machine.

#### 4.2.2 External Reporting

A Whistleblower is also free to use an External Reporting channel (to the national anti-corruption authority "ANAC") if, at the time of its submission, one of the following conditions is satisfied:

- (a) there is no mandatory activation of the internal reporting channel within his or her work context, or this channel, even if mandatory, is not active or, even if activated, does not comply with the provisions of the applicable legislation;
- (b) the reporting person has already made an internal report in accordance with the provisions of the applicable legislation and it has not been followed up;
- (c) the reporting person has well-founded reasons to believe that if he or she made an internal report, the report would not be effectively followed up or that the same report may result in the risk of retaliation;
- (d) the reporting person has reasonable basis for believing that the violation may pose an imminent or obvious danger to the public interest.

#### 4.2.3 Public Disclosure

Disclosure of Violations to the press, for example, should only be made in absolutely exceptional cases, as this has significant consequences for the Company and the Toray Group. False Reports in particular can severely damage our reputation.

Prior to disclosure, the Whistleblower should have already submitted an Internal or External Report and, despite the Report, neither the Compliance Hotline Operator, the Company, the Toray Group nor the Competent Authority have given feedback nor taken appropriate measures to remedy the Violation where necessary within three (03) months of Report submission.

Alternatively, before making a Public Disclosure, the Whistleblower should ensure that he or she has reasonable grounds to believe that the Violation poses an imminent or obvious threat to the public interest or, in the case of an External Report, that he or she will face retaliation or that, due to special circumstances of the case, there is little chance that effective action will be taken against the Violation by the Competent Authority.

### **4.3 Record of Reports**

Written and oral Reports are kept or stored in the Company in a retrievable and confidential manner.

The followings apply to oral Reports:

- With the consent of the Whistleblower, oral Reports (e.g., via telephone) are stored retrievable in an audio recording for as long as it is necessary and required by law. As an alternative to storage, a complete and accurate transcript of the conversation can be made.
- If there is no audio recording of the oral Report, a transcript of the conversation may be made.

For face-to-face meetings, if a meeting is held with the Whistleblower, an audio recording can also be made here with the Whistleblower's consent and this can be stored retrievable for as long as it is necessary and required by law, or alternatively a transcript can be made.

The Whistleblower can review the transcripts or minutes of the oral Reports or personal meetings, correct them if necessary and confirm them with his or her signature.

## **5. Follow-up after the Report**

### **5.1 Steps**

Every Report is treated confidentially and in compliance with the applicable data protection laws. In particular, it is ensured that the confidentiality of the identity of the Whistleblower and Reported Persons is maintained and that only persons authorized with access rights by the Company is granted access to this data.

Provided that the Whistleblower has communicated his or her identity via the Report, he or she will receive confirmation of receipt of the Report within seven (07) days once the Report is received.

Upon the receipt of a Report, the party receiving the Report shall take a follow-up action, which shall include an initial review of the Report, in particular, whether there is evidence to corroborate or refute the Report.

If the party receiving the Report believes that further investigation should be conducted, depending on the scope of the reported Violation, the Report should be documented and forwarded to the party responsible for the investigation, who then conducts an internal investigation into the reported Violation.

Whistleblowers are encouraged to support the party responsible for the investigation in its inquiries and to cooperate to the best of their ability in clarifying the Violation, while maintaining confidentiality.

The Report shall be documented, with only the necessary data being collected and processed. Insofar as is necessary on the basis of the results determined, other relevant parties including but not limited to the Authorized Decision-Makers and Competent Authorities, if necessary, will be involved and the corresponding data will be transmitted to them.

The investigation into the Reports will be carried out as quickly as reasonably possible. The Whistleblower will be informed by the party responsible for the investigation about the progress of the procedure or the follow-up measures. Feedback to the Whistleblower will be provided no later than three (03) months after

confirmation of receipt of the Report or, if in exceptional cases no confirmation has been provided, three (03) months after the expiration of the seven (07)-day period following receipt of the Report.

If a person involved in a Violation voluntarily reports such Violation and cooperates in the investigation, the Company may at its discretion reduce or exempt disciplinary action that would be imposed on such person for the Violation.

If a Report turns out to be false or cannot be sufficiently substantiated with facts, this will be documented accordingly and the proceedings will be discontinued immediately. No consequences may arise for the Reported Person; in particular, the matter will not be documented in the personnel file.

## **5.2 Reporting within the Toray Group**

If a Report is received at Toray Group's Global Whistleblowing System's Contact Point in Europe or Independent Compliance Hotline in Europe, such Report will be sent to Toray's Chief Compliance Officer for Europe and further to Toray's Compliance Department.

If a Report received at the Company's Contact Person constitutes Gross Misconduct, the Report should be sent to Toray's Chief Compliance Officer for Europe and further to Toray's Compliance Department. "Gross Misconduct" is defined by the Toray Group as (i) breach of antitrust/ competition law, (ii) breach of anticorruption law, (iii) accounting fraud and (iv) data falsification.

All transfer of any Report or any part thereof to Toray's Chief Compliance Officer for Europe and further to Toray's Compliance Department must comply with relevant data protection law.

## **6. Protection of the Whistleblowers and assisting persons**

### **6.1 Confidentiality and secrecy**

The protection of a Whistleblower is ensured by the confidential treatment of his or her identity. Information from which the identity of the Whistleblower can be directly or indirectly implied is also subject to confidentiality.

If the Whistleblower provides his or her personal data for contacting, these will be stored and used in accordance with the requirements of applicable data protection law. When his or her personal data is collected, he or she will be informed of about the purpose of the data storage and use. The same applies if his personal data is to be transferred to other parties.

In principle, the Whistleblower's name or other information that allows him or her to be identified will not be disclosed, unless when the Whistleblower consents to the disclosure or if there is a legal obligation of disclosure.

The Company is generally obligated under the European Union's General Data Protection Regulations ("GDPR") to inform the Whistleblower about the plan of disclosing his or her identity and request the Whistleblower's consent thereto. The Whistleblower shall be aware that once his or her identity has been disclosed based on his or her consent, he or she can revoke the consent at any time, but the disclosure which has been made cannot be taken back.

Without the Whistleblower's consent, his or her identity shall only be disclosed if it is required by applicable law. In particular, if disclosure of the Whistleblower's identity is essential to enable the Reported Persons to exercise their right to be heard or to defend themselves. The Whistleblower shall be informed in advance of such disclosure of his or her identity, unless such information would jeopardize relevant investigations or legal proceedings.

The same applies to the identity of those who assist a Whistleblower with the reporting process in a Professional Context.

The person providing a report by gross negligence or with criminal intent, aimed therefore at damaging people, procedures or the Company or at creating prejudice towards persons, shall be subject to disciplinary measures, in accordance with the relevant contract of employment, in addition to further actions provided for at law.

## **6.2 Protection against retaliation**

Any Whistleblower who makes a Report in good faith or cooperates in the investigation of a Violation needs not expect any negative consequences or retaliation (e.g., suspension, termination, demotion, transfer of duties, poor evaluations, disciplinary action or discrimination) as a result of the Report itself or of his or her cooperation in the reporting process. The threat or attempt of retaliation is also not permissible.

This protection against retaliation also applies to those who assist the Whistleblower, third parties related to the Whistleblowers, companies owned by the Whistleblowers, people who worked for or associated within a Professional Context with the Whistleblower.

If, despite the above prohibition, such a retaliation still occurs, it can be reported as a Violation in accordance with Section 4.2 through the reporting channels provided therein. Any discrimination, harassment or the like will not be tolerated by the Toray Group. The Company will examine the circumstances of each case and may take temporary or permanent measures to protect the Whistleblowers, etc. and to safeguard the interests of the Company and the Toray Group. The Company will inform the parties concerned in writing of the outcome of the respective investigation.

Anyone who violates this prohibition against retaliation will be subject to disciplinary action, which in the most extreme case may result in his or her dismissal.

## **7. Misuse of the whistleblowing system**

A Whistleblower should make sure that he or she makes a Report in good faith, objectively, accurately and completely.

If a review of the Report reveals that, for example, there is no reasonable suspicion of Violation or that the facts are insufficient to substantiate a suspicion, the Whistleblower who reported in good faith will not be subject to disciplinary action.

On the other hand, a Whistleblower who deliberately misuses the whistleblowing system to make false Reports will face disciplinary actions. Impairment of the whistleblowing system through, for example, manipulation, cover-up or breach of agreements regarding confidentiality may also result in disciplinary measures such as warnings or dismissals and may have consequences under applicable civil or criminal law.

## **8. Protection for Reported Person**

### **8.1 Information about the Reported Person**

Any Reported Person will be notified of the Report directed against him or her at the appropriate time, taking into account the requirements of applicable data protection law, unless such notification would significantly impede the progress of the proceedings to establish the facts or the implementation of follow-up measures. The notification shall be made at the latest after the investigation has been completed or when the investigation can no longer be jeopardized.



## **8.2 Right to be heard**

The Reported Person must be heard by the Authorized Decision-Makers before conclusions are drawn at the end of the procedure explained above. Subsequently, the Authorized Decision Makers shall decide on the remedial and disciplinary measures taking into account the interests of the Company and the Toray Group.

## **8.3 Right to data deletion**

If the suspected Violation reported cannot be confirmed after the follow-up measures, the Reported Person shall have the right to have his or her personal data stored by the Company in this context deleted.

## **9. Other rights in relation to personal data**

### **9.1 Right to information**

A person whose personal data is processed by the Company in the course of the reporting process shall in principle have the right to request information from the Group Company pursuant to Art. 15 GDPR about his or her personal data stored by the Company. This right does not exist if the personal data processed by the Company for the reporting process must be kept secret by law or due to the overriding legitimate interests of a third party.

### **9.2 Right to rectification, blocking or deletion**

A person whose personal data is processed by the Company in the course of the reporting process have the right to have their incorrect personal data corrected, the right to have their personal data completed, the right to have their data blocked or to have their data deleted, provided that the prerequisites pursuant to Art. 16 et seq. GDPR are present. A request for deletion is justified, for example, if the personal data has been processed unlawfully or the personal data is no longer needed for the purposes for which it was collected. This applies, among other things, in the cases provided for in Section 8.3 of this Policy.

### **9.3 Rights of revocation and objection**

If the processing of personal data is based on consent, this can generally be revoked by the data subject at any time without justification. By way of derogation, the provisions in Section 6.1 apply to the consent of a Whistleblower.

If personal data is processed on the basis of legitimate interests of the Company, the data subject may object to the processing of his or her personal data by the Company at any time for reasons arising from his or her particular situation. The Company will then either demonstrate overriding legitimate grounds permitting the processing or it will no longer process the data. For the period of this review, the personal data in question will be blocked.

### **9.4 Exercise of rights in relation to personal data**

A person entitled to the rights in relation to personal data under this Section 9 can exercise these rights by contacting the Company or the relevant data protection officer of the Company (if any) under the contact details provided.

## **10. Right to appeal**

### **10.1 Violation of this Policy**

Both the Whistleblower and the Reported Person may contact the Company's Contact Person with any Information of Violation of this Policy.

The Information of Violation of this Policy will be reviewed and forwarded to Toray's Chief Compliance Officer for Europe for further clarification and initiation of follow-up measures. Section 5 applies accordingly.

### **10.2 Right to review the result of the investigation**

Both the Whistleblower and the Reported Person may contact the Compliance Hotline Operator, the Company's Contact Person or Toray's Chief Compliance Officer for Europe if they consider the investigations carried out to be incorrect or inadequate or if, in their opinion, they are unfairly disadvantaged in the course of the investigations.

In this case, the necessary measures to review the investigation will be initiated and the complainant will be informed accordingly.

### **10.3 Involvement of the works council**

The Reported Person may make use of his or her right of appeal and involve the works council if allowed under applicable law.

### **10.4 Right of complaint to the data protection supervisory authority**

If a data subject believes that the Company is not processing his or her personal data in accordance with applicable data protection law, he or she may lodge a complaint with a competent data protection supervisory authority. The complaint may in particular be made to an authority in the country of the data subject's place of residence, place of work or place of the alleged Violation.

## **11. Processing of personal data**

Personal data is collected and stored as part of the whistleblowing process. This personal data is processed in compliance with the applicable data protection laws.

Only the personal data that is objectively necessary for the purposes of this Policy will be processed.

The collected personal data will be used exclusively for the purposes described in this Policy. The personal data is provided in particular to ensure the Company's legal obligations or compliance within the Company.

### **11.1 Lawful bases**

The data is processed on the basis of Art. 6(1)(f) GDPR for legitimate interests of the Company that outweigh the interests of the respective data subject. Legitimate interests include ensuring compliance within the Company; this includes the detection and clarification of operational malpractice, conduct detrimental to the Company, white-collar crime, etc., as well as the protection of employees, business partners, customers, etc.

If and to the extent that personal data is retained even after the expiry of the usual storage period, this processing is also carried out on the basis of Art. 6(1)(f) GDPR for legitimate interests of the Company that outweigh the interests of the respective data subject. Legitimate interests here are the assertion, exercise of one's own legal claims or the defense against legal claims, whereby the storage period is to be determined on a case-by-case basis.

If a Whistleblower gives his or her consent to the disclosure of his or her personal data, the legal basis is Art. 6(1)(a) and Art. 7 GDPR.

Sensitive personal data under the meaning of GDPR, if any and if necessary, shall be processed in accordance with Art. 9(2) GDPR.

The personal data collected as a result of a Report is stored separately from his or her other personal data stored by the Company. Appropriate authorization systems and appropriate technical and organizational measures ensure that only the persons responsible in each case have access to this personal data.

### **11.2 Transfer of personal data**

The personal data will only be transmitted to authorized parties and only to the extent necessary for the purposes described in this Policy. Specifically, the personal data will be shared with:

- Toray's Chief Compliance Officer and Toray's Compliance Department, if the Report has not been made directly to them;
- Competent Authorities where necessary for the follow-up and investigation of the Report.

### **11.3 Storage of personal data**

Personal data collected in connection with a Report and which is not relevant to the proceedings will be deleted without delay. Otherwise, the deletion of the collected personal data will generally take place within two (02) months after the conclusion of the internal investigation. If criminal, disciplinary or civil court proceedings are initiated as a result of a reported Violation, the storage period may be extended until the legal conclusion of the respective proceedings. An extension of the storage period may also result if the personal data is required for the assertion, exercise of own or defense against legal claims; in this case, the necessity of the storage period must be determined on a case-by-case basis.

Persons involved in the whistleblowing process can contact the Company's data protection officer at any time to have it checked whether the rights existing on the basis of the relevant applicable provisions have been observed.

## **12. Miscellaneous**

### **12.1 References to the Policy**

This Policy is available for retrieval on the Company intranet or on the Company website [www.alcantara.com](http://www.alcantara.com). Alternatively, it can be requested from the human resource department of the Company at any time.

### **12.2 Inquiries**

For questions, comments, etc. regarding the provisions of this Policy, please contact the Company's Contact Person.

### **12.3 Effective date**

This Policy is effective as of July 15<sup>th</sup> 2023.

## Whistleblowing Privacy Notice made pursuant to Art. 13-14 of the GDPR

Dear "Data Subject" we wish to inform you that "EU Regulation 2016/679 of April 27, 2016, on the Protection of Individuals with regard to the Processing of Personal Data and on the free movement of such data" (hereinafter "GDPR") provides for the protection of individuals and other subjects with regard to the processing of personal data, and that this Notice describes the processing of your personal data with regard to reports of wrongdoing and irregularities through the Alcantara S.p.A. Reporting Channels as introduced by Art. 2 co 1 L.179/2017 (so-called "Whistleblowing") and regulated, among others, by Legislative Decree 24/2023.

### THE DATA CONTROLLER

**Alcantara S.p.A.**, headquartered in Milan, via Mecenate 86, 20138, internet site <https://alcantara.segnalazioni.net> "Controller" of the processing of personal data, hereby informs you that it will proceed with the processing of the personal data you provided at the time of registration and in the reports according to the principles of fairness, lawfulness, transparency and protection of confidentiality and rights, namely yours and those of all data subjects, in compliance with the obligations imposed by the regulations on privacy and whistleblowing.

### LEGAL BASIS FOR PROCESSING

The processing of your personal data, with respect to reporting, lies in the legitimate interest of the data controller and in fulfilling a legal obligation imposed on the data controller. Personal data will be processed by the Company's **Alcantara S.p.A** Contact Person and a Whistleblowing Team in coordination with the Company in the execution of their duties or otherwise related to the exercise of their powers, with particular reference to the task of ascertaining any wrongdoing reported in the interest of **Alcantara S.p.A**, pursuant to current Whistleblowing legislation.

### TYPES OF DATA PROCESSED AND PURPOSES OF PROCESSING

The data provided by the reporter in order to communicate the alleged illegal conduct or violations of which they have become aware by reason of their service relationship with **Alcantara S.p.A.**, committed by the subjects that interact with them for various reasons, will be processed for the purpose of managing the Whistleblowing procedure in accordance with current regulations, to carry out the necessary investigative activities aimed at verifying the validity of the matter being reported, to take consequent measures, to protect a right in court and to provide a response to a possible request from the judicial authorities.

### DATA PROCESSING METHODS

The personal data collected is processed by the **Alcantara S.p.A.** Company Contact Person, who acts on the basis of specific instructions provided regarding the purposes and methods of such processing, as well as by the Reporting Team with expertise in whistleblowing. Processing will be carried out with computer and telematic tools with organisational and processing logics strictly related to the aforementioned purposes and in any case in such a way as to guarantee the security, completeness and confidentiality of the data in compliance with the organisational, physical and logical measures laid down by the provisions in force.

### RETENTION PERIOD

Personal data related to reports will be processed only as long as necessary for the determination of those reports, and will be retained **for 2 months** from the date of communication of the final outcome of the investigation. In the event that criminal, civil or disciplinary proceedings are initiated as a result of the report, we will process your data for as long as is necessary in connection with those proceedings. This is without prejudice to an additional retention period necessary for the exercise or protection of a right.

After the above time periods have elapsed, your data will be deleted or anonymised. Personal data related to reports that are not necessary or relevant to this process will be deleted without delay.

Please note that data subjects can contact the Company's Data Protection Officer at the email address [privacy@alcantara.com](mailto:privacy@alcantara.com) to check whether their rights under the relevant provisions have been respected.

## **NATURE OF DATA PROVISION**

The provision of personal data is optional. However, failure to provide the data could jeopardise the investigation of the report and subsequent compliance.

## **RECIPIENTS OF PERSONAL DATA**

Your data may be disclosed or made accessible to individuals who have a role in the management of the Whistleblowing process (specifically identified internal individuals, and external consultants who may be involved in managing the report). Such individuals are bound by a duty of confidentiality.

Your data may be accessed for strictly technical and platform-related purposes by service providers. All of the aforementioned individuals will be authorised and instructed by us to process data in accordance with Art. 29 of the GDPR.

The data and information collected may be accessed by judicial authorities, public authorities, the ANAC (National Anti-Corruption Authority), and all parties to whom the communication must be made by law.

Personal data will not be disclosed to parties other than those identified, nor will it be disseminated or disclosed, without the consent of the reporter, unless there is a legal obligation to disclose such data.

## **RIGHTS OF DATA SUBJECTS**

Data subjects have the right to obtain from **Alcantara S.p.A.**, in the cases specified, access to their personal data and the rectification or cancellation thereof or the restriction of processing concerning them or to object to processing (Art. 15 - 22 of EU Regulation 2016/679). Data subjects who believe that the processing of personal data relating to them carried out through this platform is in violation of the provisions of the Regulations, have the right to lodge a complaint, as provided for in Art. 77 of the Regulations themselves, or to take appropriate legal action (Art. 79 of the Regulation).

## **CONTACTS**

The "Controller" of the data processing is **Alcantara S.p.A.** with registered office in Via Mecenate, 86 - 20138 Milan

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