

## INFORMATION PAGE - WHISTLEBLOWING

### 1. PURPOSE AND RECIPIENTS OF THE DOMUS CHEMICALS WHISTLEBLOWING CHANNEL

The term 'whistleblowing' refers to a set of rules designed to protect individuals who report wrongdoing or irregularities within Domus Chemicals from retaliation.

The purpose, therefore, of the internal whistleblowing channel is to **guarantee the confidentiality of the whistleblower and protect them from any retaliation suffered as a result of the report**; the aforementioned protections are not guaranteed in the case of an ordinary report made to a contact person or superior.

Employees, former employees, partners and persons with administrative, management, control, supervisory or representative functions at Domus Chemicals, external persons (consultants, employees of suppliers of goods and services, trainees, volunteers) who work for and/or at Domus Chemicals, candidates for a position at Domus Chemicals may report through the internal channel.

**The reporting party may choose whether to file the report anonymously or not.** In the event that the reporting party opts for anonymity, he or she will still have the right to be kept informed of developments in the investigation following the report and the possibility of being contacted via the platform at a later stage for further information instrumental to the handling of the report. The confidentiality of the reporting party and of the persons involved will in any case be fully guaranteed.

### 2. THE CONTENT OF THE REPORTS

**Legislative Decree 24/2023 clearly specifies the violations - known in the workplace - that can be reported**, i.e.: violations of European law (e.g. disclosing the personal data of Domus Chemicals employees) or national law in civil matters (e.g. damaging company property), criminal matters (e.g. behaviour that can be classified as mobbing; accepting a sum of money to influence the choice of a supplier), administrative matters (e.g. using cash in Domus Chemicals that exceeds the threshold provided for by law), accounting matters (e.g. incorrect tax declaration).

**It is not possible to use the Domus Chemicals channel to report matters exclusively related to one's individual employment relationship**, as well as matters related to human resources, personnel management or the subject of Health, Safety and the Environment, for which one must contact the relevant departments directly. In addition, reports on breaches of national security, as well as on procurement relating to defence or national security aspects, cannot be submitted unless these aspects are covered by relevant EU secondary legislation.

Having clarified the subject matter of the reports, it is necessary to look into their practical content. Reports must contain **circumstantial information - precise and complete - on the facts, the circumstances of time and place, the persons involved and, as far as possible, the elements underlying the subject of the report**. The report may also be based on well-founded suspicions concerning the commission of violations or, on concrete, precise and concordant elements concerning events that have not yet occurred. In addition, conduct aimed at

concealing an infringement may also be reported.

Moreover, if the reporting party wishes to keep his or her identity secret and benefit from the protections provided for in the event of retaliation, he or she must indicate this in the subject line of the report.

### 3. CONSEQUENCES OF UNFOUNDED REPORTS

A whistleblower who has reported a violation in good faith shall not be subject to any disciplinary measures or retaliation of any kind in connection with the report, even if the report is later found to **be inaccurate or unfounded**.

**On the other hand, anyone who knowingly and deliberately makes a false report or false statements, disseminates misleading information or acts in bad faith** (e.g. by filing defamatory or slanderous complaints), in addition to forfeiting the right to all the protections afforded to whistleblowers under Leg. 24/2023, **shall be subject to the relative sanctions (including criminal sanctions)**, in accordance with company regulations and applicable laws. The same consequences will occur in the event of malicious use of external reporting channels.

### 4. THE PROTECTION OF THE REPORTING PARTY AND OTHER ACTORS INVOLVED

As required by Legislative Decree 24/2023, Domus Chemicals agrees to take all necessary measures to ensure the protection of the reporting party, the reported party and the parties involved in the report, including the facilitator, in order to **safeguard them from any damage to their reputation or other negative consequences** even before the content of the report is investigated.

**Domus Chemicals and the external parties involved ensure the utmost protection of all personal data** processed, preventing the undue circulation of personal information both outside and inside the Domus Chemicals offices, to parties not authorised to process such data.

Moreover, the reported parties and in any case involved in the report have all the guarantees of defence normally recognised in the course of any disciplinary or other proceedings that may be instituted as a result of the report.

**Any retaliation must be reported immediately to ANAC using the relevant external reporting channel**; once the responsibility of the perpetrators of the retaliatory conduct is established, disciplinary measures will also be applied to them by Domus Chemicals. Domus Chemicals may also take action, in accordance with applicable law, in cases of conduct that impede exercising the right to report.

### 5. REPORT HANDLING

The report is received by Antonella Paleni, Personnel Department, who will both handle the report and any preliminary investigation phase that may be necessary.

**If a person receives a report without being authorised to do so**, he/she shall (i) promptly forward said report to Fasola Corporate Law; (ii) maintain the utmost confidentiality as to the

content of the report and/or the persons involved if it has come to their knowledge. This also applies in the case of a report received by an authorised person through an incorrect channel.

The whistleblower will be given credentials to access the platform, through which he or she will immediately receive a confirmation of receipt of the report, will receive within the following 7 days a second notice of the report's receipt, and will maintain direct contact with the report handler for the duration of the investigation. In any case, the reporting party will receive the final report with the outcome of the investigation within 3 months.

Throughout the entire process of collecting and handling a report, the processing of personal data of each individual involved is performed by Domus Chemicals in full compliance with the provisions of the privacy legislation, in the manner and within the limits set out in the **privacy policy available at <https://www.domuschemicals.com/it/codiceeticoeprivacy>**. The exercise of the rights normally guaranteed to the data subject could be restricted, as this could result in effective and concrete prejudice to the protection of the confidentiality of the identity of the reporting party.

## 6. CHANNELS OUTSIDE DOMUS CHEMICALS

Under certain conditions, it is also possible to submit the report through external channels, in particular:

- a) the **ANAC website**, under the following conditions:
  - an internal report was submitted that was not followed up;
  - there is good reason to believe that the internal reporting will not be followed up;
  - the event being reported constitutes an imminent danger that needs to be reported to an authority;
- b) through **public disclosure**, under the following conditions:
  - internal and external reports have already been submitted, which have not been followed up;
  - the event being reported constitutes an imminent danger that needs to be reported the public;
  - there is a real risk of retaliation if a report is made through a different channel.

**The submission of a report through an external channel in the absence of the conditions laid down in the decree determines the loss of the protections** afforded to the reporting party pursuant to art. 20 of Legislative Decree 24/2023; this implies the recognition of the relevant responsibilities (including criminal liability) by the reporting party.

The reporting channels already provided for by law for the communication of criminal or administrative offences to the competent authorities remain available to the whistleblower, if the relevant legal prerequisites are met (e.g. filing a criminal complaint with the police).

Pedrengo, 04/12/2023

General Management

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