

WHISTLEBLOWING REPORTS

In order to safeguard the values of integrity and ethical behavior Istituto Gentili supports and encourages anyone intending to report potential inappropriate conduct, misconduct or alleged breach of the principles set forth policies and procedures and, in general, potential breaches of laws and regulations.

Pursuant to Legislative Decree No. 24 of 10 March 2023, Istituto Gentili S.r.l. has equipped itself with the prescribed channels for receiving and managing whistleblowing reports.

WHO CAN MAKE REPORTS

In accordance with Whistleblowing Regulation, within the Istituto Gentili's work environment, people are eligible to report as:

- Persons with functions of administration, management, control, supervision, or representation;
- employees, trainees, self-employed workers, freelancers and consultants or who perform their work for Istituto Gentili S.r.l.;


Persons who have held the above roles in the past, if the information about violations was acquired during the course of the relationship, and persons with whom the relationship has not yet been established - for example, candidates for selection or employees during probationary periods.

SUBJECT OF REPORTS

The list is very articulate and complex. For completeness, please refer to Legislative Decree 24/2023¹.

REPORTING CHANNELS

The whistleblower can submit a report, whether providing his/her details or anonymously through the following channel:

-  dedicated telephone line that can be reached from Italy through **toll-free number: 800 – 090 – 321 - The call is recorded**
-  sending an email to e-mail address²: istitutogentili_whistleblowing@complegal.it

Requesting an in-person meeting to be held with the relevant personnel who manages the channel for reporting in a confidential interview. The request can be sent using the channels listed above.

¹ In general, potential reports may concern violations of European Union regulations that harm the public interest or the integrity of the Company, of which the whistleblower becomes aware in the work context, consisting of: unlawful conduct relevant under Legislative Decree 231 or violations of the 231 Model; unlawful acts falling within the scope of application of European Union or national acts or national acts implementing European Union acts in the field of public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data and security of networks and information systems; acts or omissions that harm the financial interests of the European Union under Article 325 of the Treaty on the Functioning of the European Union; acts or omissions concerning the internal market, under Article 26, paragraph 2, TFEU (including violations in the field of competition and state aid and those in the field of corporate tax); acts or conduct that, while not constituting an offense, defeat the object or purpose of the provisions of the Union acts in the above sectors. Also subject to possible reporting are unlawful conduct relevant under Legislative Decree 231/2001 or violations of the 231 Model adopted by the Company .

² To protect the confidentiality of the Whistleblower, if they do not wish to consent to the disclosure of their identity, written reports must be sent from personal, non-corporate email accounts (therefore, it is necessary to avoid sending reports from corporate domain accounts). Any anonymous reports must be sent from email accounts – if necessary, also created for the occasion – from which the identity of the Whistleblower cannot be inferred.



Information Notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter: GDPR), Istituto Gentili S.r.l. (the "Company"), located at Via S.G. Cottolengo 15, 20143, Milan, as Data Controller, informs potential whistleblowers, reported persons, facilitators, and any other natural person potentially involved in the management of reports that the processing of personal data may concern various categories of information relating to natural persons, including, at least potentially, special categories of personal data (Art. 9, GDPR) and personal data relating to criminal convictions and offenses (Art. 10, GDPR). The legal bases legitimizing the processing are the fulfillment of a legal obligation (Art. 6, para. 1, letter c), GDPR) and, as regards special and criminal data, respectively the provisions of Art. 9, para. 2, letter g) and Art. 10, in conjunction with Art. 2-octies, Legislative Decree 196/2003.

The identifying data of the whistleblower will be visible exclusively to the external specialized company, acting as data processor pursuant to Art. 28, GDPR, and technological or telecommunications sub-suppliers, unless expressly consented to by the whistleblower. No further cases of communication of personal data are envisaged, except in cases of exercising the rights to assert or defend a right of the data controller or processor or third parties. No personal data will be transferred or stored outside the European Economic Area.

Personal data that are manifestly not useful for the processing of a specific report are not collected or, if accidentally collected, are immediately deleted. In any case, the data will be retained for a period not exceeding five years from the date of communication of the final outcome of the reporting procedure.

Each data subject is granted the rights provided for by Articles 15 et seq., GDPR, with the limits set forth by letter f, para. 1, Art. 2-undecies, Legislative Decree 196/2003. Therefore, the rights referred to in the aforementioned articles cannot be exercised if the exercise of such rights could result in actual and concrete harm to the confidentiality of the identity of the whistleblower. The rights to withdraw previously given consents are reserved.

To exercise the rights, you may contact the Data Controller by writing to the Data Controller's postal address or by sending an email to privacy@istitutogentili.com or to the DPO at dpo@mediolanum-farma.com.

The data subject also has the right to contact the Data Protection Authority.