


| | | | |
|---|---|------|------------|
|  | Novamedisan Italia Srl Via dei Lapidari, 3 – 40129 Bologna (BO) E-mail: info@novamedisan.it – Tel. 051/327911 | Mod. | 01 |
| | | Rev. | 01 |
| | | Data | 17/12/2023 |
| | | Pag. | Pag. 1 a 4 |
| WHISTLEBLOWING INFORMATION ON THE WEBSITE | | | |

1. WHISTLEBLOWING INFORMATION

NOVAMEDISAN ITALIA SRL in order to "*promote and encourage a culture of good communication and corporate social responsibility within organisations*", bringing to light acts, omissions or illicit conduct, in order to contribute to the improvement of the organisation, has implemented an internal system to report violations to allow subjects identified by law to report violations of national or European Union regulatory provisions that may harm the public interest or the integrity of the company, of which they have become aware, including violations of the Code of Ethics or of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01.

2. THE REGULATION

In implementation of Directive (EU) 2019/1937, Legislative Decree no. was issued. 24 of 10 March 2023 concerning "*the protection of people who report violations of Union law and containing provisions regarding the protection of people who report violations of national regulatory provisions*".

3. WHO CAN MAKE A REPORT?


The following subjects can make reports:

- employees;
- former employees;
- interns;
- collaborators;
- providers;
- consultants;
- shareholders and people with administration, management, control and supervisory or representation functions.

4. WHAT CAN BE REPORTED?

Reports may concern behaviors, acts or omissions that concern:

- administrative, accounting, civil or criminal offences;
- significant illicit conduct pursuant to Legislative Decree 231/2001 or violation of the organization and management model provided therein;
- offenses that fall within the scope of application of European Union or national acts relating to the following sectors: 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 protection of personal data and security of networks and information systems;
- acts or omissions detrimental to the financial interests of the Union;
- acts or omissions relating to the internal market, such as violations relating to competition and state aid;
- acts or behaviors that frustrate the object or purpose of the provisions set out in Union acts.

| | | | |
|---|---|------|------------|
|  | Novamedisan Italia Srl Via dei Lapidari, 3 – 40129 Bologna (BO) E-mail: info@novamedisan.it – Tel. 051/327911 | Mod. | 01 |
| | | Rev. | 01 |
| | | Data | 17/12/2023 |
| | | Pag. | Pag. 2 a 4 |
| WHISTLEBLOWING INFORMATION ON THE WEBSITE | | | |

5. WHAT MUST BE EXCLUDED FROM THE REPORT?

Reports must **NOT** be:

- linked to a personal interest of the whistleblower, which pertain to their individual working relationships, or inherent to working relationships with hierarchically superior figures (e.g. labor disputes, discrimination, interpersonal conflicts between colleagues, reports on data processing carried out in the context of the individual employment relationship in the absence of a violation of interest);
- relating to violations already regulated on a mandatory basis in some special sectors, to which the ad hoc reporting discipline continues to apply (financial services, prevention of money laundering, terrorism, transport safety, environmental protection);
- reports of breaches relating to national security, as well as procurement relating to defense or national security aspects, unless such aspects fall under relevant secondary law of the European Union.

NB: In any case, before making a report, the reporter must have a reasonable and well-founded reason to believe that the information relating to the violations to be reported is truthful and falls within the provisions of the applicable legislation.

6. WHAT THE REPORT MUST CONTAIN?

The report must be as detailed as possible, to allow the evaluation of the facts, in particular, the following essential elements must be present for the purposes of the admissibility screening:

- the identifying data of the reporting person (name, surname, place and date of birth), as well as an address to which subsequent updates can be communicated;
- the circumstances of time and place in which the event which is the subject of the report occurred and, therefore, a description of the facts which are the subject of the report, specifying the details relating to the circumstantial information and, where present, also the ways in which it became known of the facts covered by the report;
- personal details or other elements that allow the identification of the person to whom the reported facts can be attributed.

Reports from which it is not possible to deduce the identity of the reporter are considered anonymous. Anonymous reports, where detailed, are treated as ordinary reports.

It is useful to attach documents that can provide elements of substantiation of the facts being reported, as well as the indication of other subjects potentially aware of the facts.

7. WHAT PROTECTIONS ARE PROVIDED FOR THE REPORTER?

Each report is extremely confidential and, therefore, is managed with the utmost confidentiality in full compliance with applicable regulations, also in relation to the protection of the personal data of the reporter. In this regard, please note that it is also possible to report anonymously.

The measures to protect the whistleblower are:

- 1) **prohibition of retaliation:** the whistleblower cannot suffer retaliation for the mere fact of reporting. By retaliation of course

- dismissal, suspension or equivalent measures;
- demotion or failure to promote;

| | | | |
|---|---|------|------------|
|  | Novamedisan Italia Srl Via dei Lapidari, 3 – 40129 Bologna (BO) E-mail: info@novamedisan.it – Tel. 051/327911 | Mod. | 01 |
| | | Rev. | 01 |
| | | Data | 17/12/2023 |
| | | Pag. | Pag. 3 a 4 |
| WHISTLEBLOWING INFORMATION ON THE WEBSITE | | | |

- change of functions, change of workplace,
- salary reduction, modification of working hours;
- the suspension of training or any restriction of access to it;
- negative merit notes or negative references;
- the adoption of disciplinary measures or other sanctions, including pecuniary ones;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavorable treatment;
- failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;
- failure to renew or early termination of a fixed-term employment contract; damage, including to the person's reputation, in particular on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income;
- improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- the early termination or cancellation of the contract for the supply of goods or services;
- the cancellation of a license or permit;
- the request to undergo psychiatric or medical tests

2) **support measures:** a list of Third Sector Bodies from which the whistleblower can receive support measures such as: free information, assistance and consultancy has been established at the National Anti-Corruption Authority (ANAC);

3) **protection from retaliation:** possibility of communicating to the ANAC the retaliation suffered by the whistleblower.


8. FURTHER PROTECTIONS ARE PROVIDED BESIDES THAN FOR THE REPORTER?

Yes. The measures to protect the whistleblower also apply:

- to the facilitator (natural person who assists the reporter in the reporting process, operating within the same working context and whose assistance must remain confidential);
- to people from **the same working context** as the reporting person, the person who filed a complaint or the person who made a public disclosure and who are linked to them by a stable emotional or kinship bond within the fourth degree;
- to work colleagues of the reporting person or of the person who has filed a complaint or made a public disclosure, who work in the same working context as the person and who have a regular and current relationship with that person.
- to entities owned by the reporting person or for which the same people work as well as to entities that operate in the same working context as the aforementioned people.

9. CASES OF LOSS OF PROTECTION ARE EXPECTED?

YES. When the criminal liability of the reporting person for the crimes of defamation or slander or in any case for the same crimes committed with the report to the judicial or accounting authority or his civil

| | | | |
|---|---|------|------------|
|  | Novamedisan Italia Srl Via dei Lapidari, 3 – 40129 Bologna (BO) E-mail: info@novamedisan.it – Tel. 051/327911 | Mod. | 01 |
| | | Rev. | 01 |
| | | Data | 17/12/2023 |
| | | Pag. | Pag. 4 a 4 |
| WHISTLEBLOWING INFORMATION ON THE WEBSITE | | | |

liability, for the same, is ascertained, even with a first degree sentence title, in cases of willful misconduct or gross negligence, protections are not guaranteed and a disciplinary sanction is imposed on the reporting person.

10. HOW TO MAKE REPORT?

The Company has set up an internal paper-based reporting channel: it can be activated by sending ordinary or registered mail via external postal services, to the address:

NOVAMEDISAN ITALIA SRL

“RISERVATA AL GESTORE DELLE SEGNALAZIONI” // “RESERVED FOR THE REPORTING MANAGER”

Via dei Lapidari, 3 – 40129 Bologna (BO)

To guarantee the confidentiality of the reporter, it is necessary to use three closed envelopes, inside which the necessary documents must be inserted. In particular, the reporting person's data and the address where he or she wishes to be contacted by the reporting manager must be entered in the first envelope; in the second the report, in the third the two envelopes mentioned above with the words "Whistleblowing Report - reserved for the manager of the report", and no other indication that could allow us to trace the identity of the reporter.

The whistleblower can request in the report itself a direct meeting with the person responsible for managing the report. In this case, the meeting will be organized within a reasonable timeframe (within 15 days) within the scope of availability.

The meeting will be organized in a place suitable to guarantee the confidentiality of the reporting person and the manager will be able to arrange - with the prior consent of the reporting person - the recording of the same using devices suitable for storage and listening. In the event that it is not possible to proceed with the registration (for example, because the reporting party has not given consent or the IT tools suitable for registration are not in possession), the manager will draw up a report which must also be signed by the reporting person, as well as by the person who received the declaration. A copy of the report will be given to the reporting party.

We will acknowledge receipt of the report within **7 days**.

Within **3 months**, evidence will be given of the closure of the investigation, which may consist of the communication of the dismissal, the start of an internal investigation and possibly the related findings, the measures adopted to address the issue raised, the referral to an authority competent for further investigations.