

**ADOPTION OF THE WHISTLEBLOWING PLATFORM**

In accordance with the provisions of Legislative Decree no. 24 of 10 March 2023 ('**Whistleblowing Decree** '), and with the high ethical, legal and professional standards by which the Company is inspired, hlpv's Board of Directors has adopted a procedure for handling whistleblowing reports (hereinafter the '**Whistleblowing Procedure** ') and appointed the Company's Supervisory Board as the Whistleblowing Manager.

hlpv has also implemented its own dedicated IT platform ('**Whistleblowing Platform** '), which allows reports to be made in both written and verbal form. Matters may also be reported anonymously, provided they are substantiated and adequately documented.

The Whistleblowing Platform can be accessed via the following link:  
<https://hlpv.integrityline.com/>

Please remember that under the Whistleblowing Decree, the following reports can be made:

- violations consisting of unlawful conduct pursuant to Legislative Decree 231/2001 or infringements of the Organisation, Management and Control Model adopted by hlpv;
- infringements of European legislation (with regard to the areas identified in more detail in the Whistleblowing Procedure).

When making your report, you will be asked to create a password, which will be associated with an identification number by the Whistleblowing Platform after the report has been sent.



It is essential to note down and keep this code together with your chosen password, so that you can check the progress of your report at any time and receive feedback on its follow-up.

hlpv staff does not have access to these codes and will not be able to provide support in the event they are lost.

It should also be noted that matters can also be reported in a meeting with the Whistleblowing Manager, at the request of the whistleblower, scheduled no later than ten working days from the date of receiving the request.

hlpv thanks all those who take an active part in protecting the company's integrity and helping to spread the culture of legality within the company.

<b>THE WHISTLEBLOWING PROCESS (AT A GLANCE)</b>	
<b>PRELIMINARY EVALUATION</b>	The Whistleblowing Manager carries out a preliminary assessment of the report, and within seven days of receiving it, issues an acknowledgement of receipt to the Whistleblower via the Whistleblowing Platform.
<b>INVESTIGATION</b>	<p>If the Whistleblowing Manager considers the report to be well-founded:</p> <ul style="list-style-type: none"> <li>○ they classify the report</li> <li>○ they perform specific assessment activities</li> <li>○ they examine the circumstances by analysing the available documents and data</li> <li>○ they discontinue the investigation if they consider the report to be unfounded</li> <li>○ they provide diligent feedback to the Whistleblower.</li> </ul> <p>Within three months from the date on which receipt was acknowledged, the Whistleblowing Manager provides feedback to the Whistleblower, via the Whistleblowing Platform, on the action already taken or intended to be taken on the report.</p>
<b>DECISION</b>	<p>The Whistleblowing Manager can:</p> <ul style="list-style-type: none"> <li>○ <b>file</b> without comment;</li> <li>○ recommend <b>corrective action</b>;</li> <li>○ <b>involve corporate functions</b> in the taking of any disciplinary measures;</li> <li>○ <b>inform</b> corporate bodies for appropriate consideration of any action to be taken within their remit.</li> </ul>
<b>MONITORING</b>	<p>It is the responsibility of the heads of those functions/processes concerned by the report to implement the recommendations and corrective actions.</p> <p>The Whistleblowing Manager monitors the implementation of recommendations and corrective actions.</p>
<b>DOCUMENT RETENTION</b>	The Whistleblowing Manager documents the management of the various stages and retains said documentation, without prejudice to further legal deadlines in the cases expressly provided for, for five years from the date of closure of the preliminary investigation activities.