

ADVANCED GROUP Srl

Whistleblowing procedure

1 OBJECTIVES AND SCOPE OF APPLICATION

This Whistleblowing Policy (hereinafter the "Policy") adopted by ADVANCED GROUP Srl (hereinafter the "Company" or "ADVANCED GROUP") establishes the procedure for making a Report relating to Violations, the guidelines for managing Reports and the protection standards for Reporters, Facilitators and Related Persons (for all definitions of the terms used, see the "Definitions" point). The Policy also guarantees the principles of confidentiality, protection of anonymity and prohibition of retaliation, in compliance with applicable regulations.

The provisions of this Policy do not prejudice or limit in any way the right or obligation, as possibly defined by the applicable legislation, to report to the competent regulatory, supervisory or judicial authorities in the countries where the Company operates and/or to any supervisory body established at the Company.

This Policy is addressed to all the Recipients defined in the "Definitions" point and applies to the Company, without prejudice to any specific local laws governing the topic in question that are in conflict with the same.

The Policy is drawn up in accordance with the following regulations:

- Legislative Decree 231/2001 containing *"Discipline of the administrative liability of legal persons, companies and associations even without legal personality"*;
- Legislative Decree 24/23 containing *"Implementation of European Directive 1937/19 of the European Parliament and of the Council, concerning the protection of persons who report violations of Union law and containing provisions concerning the protection of persons who report violations of the provisions national regulations"*;
- Regulation (EU) 2016/679, on *"Protection of natural persons with regard to the processing of personal data, as well as the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)"*;
- Legislative Decree 196/2013 and subsequent amendments, containing *the "Code regarding the protection of personal data, containing provisions for the adaptation of national legislation to Regulation (EU) no. 2016/679 of the European Parliament and of the Council, of 27 April 2016, concerning the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data and repealing Directive 95/46/EC"*.

In the drafting, the following were also taken into account:

- ANAC Guidelines - Approved with resolution n°311 of 12 July 2023
- Operational guide for private entities - Confindustria, October 2023

2 DEFINITIONS

"Whistleblowing" means the action of reporting Violations by the Whistleblower.

The "**Reports**" covered by this Policy indicate the communication, through the procedure set out in the following paragraphs, of information on Violations.

"Violations" concern actions or omissions committed during or related to work activities, by any person within the Company, on its behalf or in relations with the Company or the Company's stakeholders.

Company, which have occurred, may reasonably be expected to have occurred or are highly likely to occur, as well as attempts to conceal such acts or omissions, and which constitute or may constitute a violation, or inducement of a violation or defeat the object or purpose:

- of laws and other applicable regulations, at all levels (international, national, regional, local), without prejudice to any specific limitations defined by the locally applicable legislation (see Legislative Decree 24/2023, art. 1 "Scope of objective application");
- the values and principles established in the Company's Code of Ethics, in the Company's Principles of Conduct and in the other Company procedures regarding anti-corruption.

The "**Recipients**" of this Policy are natural persons who have directly or indirectly obtained information regarding Violations, by way of example and not limited to:

- employees, including former employees and candidates in the selection phase; • collaborators (freelancers, consultants, volunteers, interns, etc.); • members of the corporate bodies (including members of the administrative, management or supervisory bodies) and shareholders of society;
- employees, collaborators, members of corporate bodies and shareholders, of customers, suppliers, subcontractors (including the entire supply chain) and other business partners (including joint ventures); • any third party affiliated with the persons mentioned above; • local communities and members of civil society organizations (e.g. NGOs); • more generally, any stakeholder of the Company.

A "**Reporter**" is any Recipient who submits a Report.

The “**Reported Person**” is the perpetrator or alleged perpetrator of the Violation.

The “**Reports Manager**” is the function responsible for managing the Report received, based on the channels defined in the “Reporting Channels” point. In the specific case, the Reporting Manager will be the HR function.

The “**Facilitators**” are the natural persons who assist a Reporter in the Reporting procedure, connected to the latter by a work relationship.

“**Related Persons**” are natural persons who have a personal or working relationship with the Reporter.

The extents or limitations to the legal protection afforded to Reporters and other related/supporting parties may vary based on locally applicable laws, their role and the type of Violation reported.

3 GENERAL PRINCIPLES

The Company undertakes to respect the following general principles in managing the Whistleblowing process and requires that Whistleblowers and other people involved respect them to the extent of their competence:

- **Principle of confidentiality:** the Company guarantees the confidentiality of Whistleblowers, Reports and information contained within them, as better specified in the “Confidentiality” point;

- **Principle of proportionality:** the investigations conducted by the Company are adequate, necessary and commensurate to achieve their purpose; • **Principle of**

impartiality: the analysis and processing of Reports are carried out without subjectivity, regardless of the opinions and interests of the people responsible for their management; • **Principle of good faith:** the protections for the Reporter (specified in the “Prohibition of retaliation” point) are also applicable in cases where the Report proves to be unfounded, if it was made in good faith (i.e. the Reporter had reasonable grounds to believe that the information relating to the Violations was true at the time of the Report and that the information fell within the scope of the Policy); no Whistleblower can take advantage of these protections to avoid a disciplinary sanction against them.

4 REPORT MANAGEMENT

4.1 REPORTING CHANNELS

A Whistleblower may submit a Report through the following alternative channels:

(i) **Written channel:** the Reporter may send his Report by sending it in a closed envelope addressed to Reports Manager containing in turn two other envelopes.

The Reporter must therefore follow this procedure:

A – Prepare a document containing the Report drawn up within the terms set out in the following point 4.2. and insert it into a first closed envelope;

B – Prepare a document containing your personal data and insert it in a second closed envelope;

C – Insert the two envelopes indicated in points A and B in a third envelope, close it and send it by registered mail with return receipt to the following address: ADVANCED GROUP Srl, 20043 Vanzago (MI), Via della Corte Bruciata n°21 – At the address of the Reports Manager.

(ii) **Oral channel:** the Whistleblower may communicate his/her Report by contacting the Reports Manager on the dedicated number +39 333 1651384.

The Reporting Manager - appointed with the minutes of the administrative body - receives adequate instructions, and independent, has the necessary skills to carry out his duties and manages the Reports with appropriate diligence; may perform other tasks and duties in addition to Report Management, provided this does not result in a conflict of interest. Anyone who receives a Report that falls within the scope of this Policy outside of the dedicated channels, for any reason and by any means, must: 1. guarantee the confidentiality of the information received, having the obligation not to disclose the identity of the Reporter nor of the Reported Person or

any other person mentioned in the Report, nor any information that would allow them to be identified, directly or indirectly; any breach of confidentiality will be subject to civil, disciplinary or criminal liability, if applicable;

2. direct the Reporter to comply with the procedure for submitting Reports established by it Policy and/or forward the Report using the dedicated channels established by this Policy.

The Violation may possibly be reported through the external channel activated by the ANAC, or disclosed publicly (putting information on violations into the public domain through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people), only when even just one of the following hypotheses occurs:

- the internal and/or external report, already made, has not been followed up;
- the Reporter has reasonable grounds to believe that, by using the internal and/or external channel, the report would not be effectively followed up;
- the Reporter has a well-founded fear of suffering retaliation;
- the Violation may constitute an imminent or obvious danger to the public interest.

4.2 CONTENT AND SENDING OF REPORTS

Recipients who become aware of Violations are encouraged to report the facts, events and related circumstances promptly, in good faith and provided they have reasonable grounds to believe that such information is true. The Reports must be as detailed as possible, to provide useful and adequate information that allows the effective verification of the validity of the events reported. If possible and when known to the Reporter, the Report must include: • name of the Reporter and relevant contact

details for further communications; however, Reports can also be submitted anonymously, and the Company guarantees anonymous Reporters adequate means to monitor their Reports while respecting their anonymity;

- a detailed description of the events that occurred (including date and location) and how Reporter became aware of it;
- which law, internal regulation, etc. is believed to have been violated;
- the name and role of the Person(s) Reported or the information that allows him/her to be identified; • the name and role of any other parties who may report on the reported events; • any documents or other elements that can prove the events reported.

The documentation will be stored and processed according to applicable laws, as also specified in the point "Processing of personal data".

All channels listed are designed and managed securely, in order to prevent access to information by unauthorized personnel and to ensure that the identity of the Reporter and other people involved in the investigation remains confidential. Disputes, claims or requests linked to a personal interest of the reporting person or of the person who has filed a complaint with the judicial or accounting authority which relate exclusively to their individual work or public employment relationships cannot be the subject of the Report, or inherent to one's work or public employment relationships with hierarchically superior figures (therefore, for example, reports regarding labor disputes, discrimination between colleagues, interpersonal conflicts between the reporting person and another worker are excluded).

4.3 VERIFICATION OF REPORTS

The Reporting Manager, having received the report, issues the Reporter with acknowledgment of receipt within 7 days of the date of receipt.

The Reports Manager reviews the Report to determine whether it is substantiated.

Initially, it conducts a preliminary analysis to determine whether there is sufficient evidence for a potential or actual Breach (the so-called "plausibility check").

In case of a positive outcome, the Report is further investigated. Otherwise, the Report will be archived in a specific register, in line with the applicable data retention legislation; the Reporter is informed and, if the Report does not fall within the scope of this Policy, it may be referred to other channels or other company procedures.

If it is possible to believe that the facts contained in the Report constitute a crime, the Reporting Manager assesses, in agreement with the other competent corporate functions and the Company's management, whether and when the information contained in the Report should be notified to the competent judicial authorities, also based on applicable legislation. The Whistleblower Manager is therefore responsible for verifying the Report and conducting a timely and accurate investigation, in compliance with the principles of impartiality, fairness, proportionality and confidentiality towards the Reporter, the Reported Person and all parties involved in the Report.

During these checks, the Whistleblower Manager can avail itself of the support of the company functions competent from time to time and/or specialized external consultants, guaranteeing the confidentiality of the information and making as much personal data anonymous as possible. The Reports Manager may also entrust other company functions with the responsibility of conducting some or all of the Report verification activities.

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In any case, the Whistleblower Manager remains responsible for monitoring compliance with the principles set out in this Policy, the formal correctness of the process and the adequacy of subsequent actions. It is understood that any disciplinary measures will be defined as specified in the "Results of checks" point.

During the investigation, the Whistleblowing Manager may ask the Whistleblower to provide further supporting information that is necessary and proportionate; the Reporter has the right to complete or correct the information provided to the Reporting Manager, in compliance with the principle of good faith (the Company reserves the right to take measures to protect itself against Reporters who knowingly submit false reports). The Reporting Manager may also conduct interviews or request information from other people who may be aware of the reported events.

The Reported Persons are guaranteed the right to defense and/or to be informed of the outcome of the investigation, within the limits established by applicable legislation.

If the Reporting Manager finds himself in a position of conflict of interest in the evaluation of the report and/or in the execution of the investigation (conflict of interest occurs in those cases in which the reporting manager coincides with the reporting party, with the person reported or is in any case a person involved or affected by the report), must declare it to the administrative body of the Company and to any Supervisory Body, and must refrain from participating in the activities relating to the specific practice.

In the event of a conflict of interest of the Report Manager, the report will be taken over by the administrative body of the Company, which will have the obligation to manage it as defined in this Policy, guaranteeing its confidentiality and traceability. If the Reporter identifies a conflict of interest in the Report Manager, the Report may be addressed to the administrative body of the Company.

4.4 VERIFICATION RESULTS

Once the verification phase is completed, the Whistleblowing Manager prepares a report summarizing the investigations carried out, the methods used, the results of the plausibility check and/or investigation, the supporting elements collected, and the recommendations for a plan of action. If the Report is archived, the reasons will be specified.

In any case, the Reporting Manager proceeds to respond to the Reporting Party within 3 months from the date of acknowledgment of receipt and in any case within 3 months and 7 days, communicating to the Reporting Party the information relating to the status of the Report and any actions that are intended undertake following the report.

Based on the results, the report is then shared with the Managers of the Company and the corporate functions involved on the basis of the "need to know" principle (including the possibility of sharing an anonymized version of the document) to determine, in agreement with the functions competent authorities, an action plan (where necessary) and/or any other measures to be taken (including any disciplinary measures against employees).

The documentation relating to each Report received, even if the investigations conclude that there are insufficient supporting elements, is kept in compliance with the confidentiality requirements according to the times and methods established by the applicable regulations.

The Whistleblowing Manager reports, at least every six months, on the number and type of Whistleblowing Reports received and on the outcome of the activities conducted to the statutory corporate control and supervision bodies (where present), guaranteeing the anonymity of the subjects involved.

As part of this activity, it will also be assessed whether the procedure described in this Policy is effective and achieves the defined objectives. If there are indications of changes in the operating environment or other elements that negatively impact the effectiveness of the Reporting process, the Company will evaluate any changes to the process itself.

5 ADOPTION AND DIFFUSION

The adoption and updating of this policy is the responsibility of the Administrative Body, after consulting the representatives and/or trade unions, where present, regarding the identification of the internal reporting channel.

This document is brought to the attention of company personnel upon adoption, in the event of an update and in any case during the selection phase and upon hiring.

This document is displayed and made easily accessible to company staff by posting it on the notice board and publishing it on the company Intranet.

Clear information on the channel, procedures and prerequisites for making internal and external reports is published on the Company's institutional website.

6 CONFIDENTIALITY

In encouraging Recipients to promptly report any Violation, the Company guarantees the confidentiality of each Report and the information contained therein, including the identity of the

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Reporter, the Person(s) Reported, the Facilitators and any other person involved. Their identities will not be disclosed to anyone outside of the Reporting Manager, except: a) where they provide their explicit consent, or have intentionally disclosed their identity in other areas; b) or judicial proceedings, pursuant to applicable legislation.

communication is a necessary and proportionate obligation in the context of investigations by the Authorities

Information contained in Reports that constitute trade secrets may not be used or disclosed for any purpose other than that necessary to resolve the Report.

7 PROHIBITION OF RETALIATION

The Company does not tolerate any form of threat, retaliation or discrimination, attempted or actual, against the Reporters, Facilitators, Related Persons, the Reported Persons and anyone who collaborated in the investigations to prove the validity of the Report (including the respective Related people).

The Company attempts to eliminate (where possible) or compensate for the effects of any retaliation against the subjects mentioned above. The Company reserves the right to take appropriate action against anyone who carries out, or threatens to carry out, acts of retaliation against the subjects listed above, without prejudice to the right of the parties involved to legally protect themselves if responsibilities of a criminal or civil related to the falsity of what was declared or reported.

The Company may take the most appropriate disciplinary and/or legal measures, to the extent permitted by applicable law, to protect its rights, assets and image, against anyone who has made false, unfounded or opportunistic reports in bad faith, and/or for the sole purpose of slandering, defaming or causing harm to the Reported Person or other parties involved in the Report.

8 PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of EU Regulation 679/2016 (so-called GDPR), the data of the natural persons involved in the Report (reporter, reported, facilitator, any other third parties) will be processed in the manner indicated in the attached information (**Annex A**).

Approval date

02 May 2024

The Administrative Body

ANNEX A

PRIVACY POLICY WHISTLEBLOWING REPORTS

Dear Sir/Madame,

pursuant to article 13 of EU Regulation 2016/679 (so-called **GDPR**) we inform you of the methods with which we will process the personal data that will be communicated to us by you on the occasion of a possible report made pursuant to Legislative Decree 10 March 2023, n°24 on Whistleblowing.

Please note that, considering the peculiarity of the matter, Whistleblowing reports may contain personal data of a common nature, of a particular nature and of judicial nature relating to all natural persons - identified and identifiable - involved in various capacities in the reported events (reporter, reported, facilitator , any other third parties), so-called. interested.

Who will process the personal data?

The personal data will be processed by Advanced Group Srl (hereinafter, also just "**Advanced Group**"), with registered office in 20043 Vanzago (MI), Via della Corte Bruciata n°21, which will act as "Data Controller"; you can contact the Data Controller at the e-mail address: info@sc-project.com.

The processing may also take place, in the name and on behalf of ADVANCED GROUP, by other subjects appointed for this purpose as "**Data Processors**", belonging to the following categories: IT service providers.

The Data Controller has also appointed a Data Protection Officer (so-called "**DPO**"), who can be contacted at dpo@sc-project.com.

How and why will personal data be processed?

Personal data - with reference to each specific purpose - will be processed as follows

	PURPOSE	LEGAL BASIS	STORAGE TIME
WH1	Management of Whistleblowing reports	Legislative Decree 10 March 2023, n°24	5 years from receipt of the report

We also specify the following:

CONFERMENT	The provision of data is mandatory and necessary to comply with the regulations regarding Whistleblowing. Consequently, failure to provide it would not make it possible to comply with these requirements.
CATEGORIES OF RECIPIENTS	In addition to the Data Controllers, further recipients of the data may be: Judicial Authorities, consultants.
AUTOMATED DECISION-MAKING PROCEDURES	There are no automated decision-making processes.
TRANSFERS OUTSIDE THE EU OA INTERNATIONAL ORGANIZATIONS	Transfers to non-EU countries are not foreseen.

What will your rights be?

You may exercise the following rights by sending a specific request to the Data Controller at the e-mail address info@sc-project.com; Please note that the exercise of rights may be limited if this could result in effective and concrete prejudice to the confidentiality of the identity of the person reporting the report.

RIGHT	DESCRIPTION
ACCESS (see Article 15 GDPR)	Right to have confirmation of the existence or otherwise of the processing and to access the data themselves and information relating to: purposes of the processing, categories of data processed, any recipients, any transfers and any adequate guarantees, retention period, rights of the interested party, possible existence of an automated decision-making process. The Data Controller provides a copy of the personal data. If the request is made by electronic means, and unless otherwise indicated, the information is provided in a commonly used electronic format.
CORRECTION (see Article 16 GDPR)	Right to obtain rectification of inaccurate personal data and integration of incomplete personal data.
CANCELLATION (see Article 17 GDPR)	Right to obtain the deletion of personal data concerning the interested party if: they are no longer necessary in relation to the purposes, you revoke your consent (and there is no other legal basis for the processing), you oppose the processing for reasons related to your particular situation (and there is no overriding legitimate reason), objects to the processing for direct marketing purposes, the personal data are processed unlawfully, must be deleted to fulfill a legal obligation, were collected in relation to the offer of information society services. The right does not apply if the processing is necessary for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for the execution of a task carried out in the public interest or in the exercise of public powers, for reasons of public interest in the health sector, for archiving purposes in the public interest, for scientific or historical research or for statistical purposes, for the assessment, exercise or defense of a right in court.
LIMITATION (see Article 18 GDPR)	Right to request the retention of the data only if: the interested party has contested the accuracy of the data (for the period necessary to verify its accuracy), the processing is unlawful (but the interested party has requested limitation rather than deletion), the data are necessary for the interested party in judicial proceedings and, although the owner no longer needs them, he has exercised the right to object (while the owner verifies the existence of legitimate and overriding reasons)
OPPOSITION (see Article 20 GDPR)	Right to object to the processing of your data if (i) it is based on public interest or legitimate interest and (ii) if the data is processed for direct marketing purposes, including profiling.
PORTABILITY (see Article 21 GDPR)	Right to receive data in a structured format (only for automated processing).
WITHDRAWAL OF CONSENT (see Article 13, c.2, d)	Right to withdraw consent at any time, where provided for as a legal basis, without prejudice to the lawfulness of the processing based on it before the revocation.
COMPLAINT (see Article 13, c.2, d)	Right to lodge a complaint with the Guarantor Authority for any alleged violation of the GDPR.