

**WHISTLEBLOWING GUIDELINES**

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<b>Date</b>	<b>Review</b>	<b>Description of Amendments</b>
December 2023	Release	
February 2024	1	Whistleblowing Function’s name review

## 1 Foreword

Prelios Group Companies have adopted the *Operational Standard OP 036 “Whistleblowing Procedure”* (hereinafter referred to as “**Whistleblowing Procedure**”) to regulate the functioning of the whistleblowing channel (hereinafter referred to as “**Reporting Channel**”) and the arrangements to protect those who use the channel to report (hereinafter referred to as “**Whistleblower(s)**”) unlawful conduct of which they have become aware in the context of their own work (hereinafter “**Report**”), as a means of safeguarding the legality, integrity and good performance of Prelios Group Companies and protecting the public interest.

These Guidelines therefore represent a part of the Whistleblowing Procedure and aim to help each potential Whistleblower to understand *i)* the legal requirements for submitting a Report, *ii)* as well as the safeguards provided to them and those involved in the Report.

A particular distinction must be made between:

- **Whistleblowing Reports**<sup>1</sup>, i.e., Reports governed and protected by Legislative Decree 24/2023 and by the ANAC Guidelines adopted by Resolution 311 of 12.07.2023, concerning:
  - a. unlawful conduct within the meaning of Legislative Decree 231/2001, or violations of the Organisational, Management and Control Model (hereinafter “**MOG231**”) adopted by Prelios Group Companies;
  - b. offences falling within the scope of EU or national acts relating to the following areas: 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; privacy and personal data protection and security of networks and information systems;
  - c. acts or omissions affecting the financial interests of the Union;
  - d. acts or omissions relating to the internal market;
  - e. acts or conduct that frustrate the object or purpose of the provisions of Union acts;
- **Ordinary Reports**<sup>2</sup>, i.e., Reports governed by sector regulations and excluded from the scope of application of Legislative Decree 24/2023, such as:
  - f. Reports required by the regulations on **banking and financial services** set forth in Articles 52-*bis* and 52-*ter* of the Consolidated Banking Act (TUB) and in Articles 4-*undecies* and 4-*duodecies* of the Consolidated Finance Act (TUF), and related implementing provisions, to the extent applicable to Prelios Credit Servicing S.p.A. and Prelios SGR S.p.A.;
  - g. Reports on **anti-money laundering** with regard to the persons required to comply therewith - and applicable to Prelios Credit Servicing S.p.A., Prelios Credit Solutions S.p.A., Prelios Agency S.p.A. and Prelios Società di Gestione del Risparmio S.p.A. - pursuant to Article 48 of Legislative Decree 231/2007;
  - h. Reports relating to the violation of the **Anti-corruption Policy** adopted by the Prelios Group Company pursuant to the ISO 37001:2016 standard “Management System for the Prevention of Corruption”;
  - i. **anonymous** Reports;
  - j. Reports concerning disputes, claims or requests linked to a personal interest of the whistleblower or of the person lodging a complaint with the judicial authority, relating exclusively to their individual employment relationships, or their employment relationships with their superiors (e.g. labour disputes, discrimination, etc.).

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<sup>1</sup> Chapters 2 to 6 apply to Whistleblowing Reports.

<sup>2</sup> Chapters 3.1, 5.3 and 6 do not apply to Ordinary Reports.

To manage the Reports received (both Whistleblowing and Ordinary), the Prelios Group has set up three Whistleblowing Functions, namely:

- A. the **Whistleblowing Function of Prelios S.p.A.**, composed of the heads of the Internal Audit, Risk Management and Legal Affairs & Compliance Functions of Prelios S.p.A. It is competent to deal with Reports concerning the following Prelios Group companies:
  - Prelios S.p.A.;
  - Prelios Agency S.p.A.;
  - Prelios Integra S.p.A.;
  - Prelios Valuations & e-Services S.p.A.;
  - Prelios Credit Solutions S.p.A.;
  - Prelios Innovation S.r.l.;
  - Prelios Credit Agent S.r.l.;
  
- B. the **Whistleblowing Function of Prelios Credit Servicing S.p.A.**, composed of the heads of the Internal Audit, Risk Management and Compliance & Anti-money Laundering Functions of Prelios Credit Servicing S.p.A. It is competent to deal with Reports concerning Prelios Credit Servicing S.p.A.;
  
- C. the **Whistleblowing Function of Prelios SGR S.p.A.**, composed of the heads of the Internal Audit, Risk Management and Compliance & Anti-money Laundering Functions of Prelios Credit SGR S.p.A. It is competent to deal with Reports concerning Prelios SGR S.p.A.

Reports concerning unlawful conduct within the meaning of Legislative Decree 231/2001 or breaches of the MOG231 adopted by the Prelios Group Companies are handled in agreement between the competent Whistleblowing Function and the **Supervisory Body** of the company concerned by the breach.

## 2 Addressees

The Reporting Channel can be activated by the following persons:

- i. **subordinate workers**, including those with part-time, intermittent, fixed-term, temporary, apprenticeship and ancillary work contract (under Legislative Decree 81/2015) and workers who provide occasional services (whose employment relationship is governed by Article 54-bis, Decree Law 50/2017, converted with amendments by Law 96/2017) and **volunteers and trainees**, paid and unpaid;
- ii. **self-employed workers** pursuant to Article 2222 et seq. of the Civil Code who work for the Prelios Group or who are party to a collaboration agreement taking the form of continuous and coordinated, mainly personal, work, even if not of a subordinate nature (Article 409(3), Code of Civil Procedure) or collaborators under Article 2 of Legislative Decree 81/2015 taking the form of exclusively personal and continuous work, the arrangements of which are organised by the principal;
- iii. **freelance professionals and consultants** who work for Prelios Group Companies and who may be in a privileged position to report the breaches they witness;
- iv. **shareholders** who are natural persons, if any, who hold shares in one or more Prelios Group Companies and who have become aware of breaches in the exercise of their rights;
- v. **persons with administration, management, control, supervision or representation functions** in Prelios Group Companies, even when such functions are exercised on a mere de facto basis (by way of example but not limitation, directors, with or without executive positions, members of the Board of Statutory Auditors or of the Supervisory Body);
- vi. and, in any case, any natural person who works in various capacities for the Prelios Group Companies and who becomes aware of breaches within the context of their working environment.

For all the aforementioned persons, the safeguards also apply if the Report is made before the establishment or after the termination of the contractual relationship, provided that the information was collected during the

pre-contractual and/or selection phases, during the probationary period or in the course of the relationship itself.

With regard to Whistleblowing Reports, the aforesaid safeguards referred to in Chapter 5 also apply to:

- vii. the **facilitator**, understood as a natural person working in the same work environment as the Whistleblower to whom they provided assistance, in a confidential manner, in the whistleblowing process;
- viii. the **persons in the same work environment** as the Whistleblower and linked to them by relations arising from the fact that they work or have worked in the same work environment (e.g. colleagues, former colleagues, collaborators, etc.), provided that they are **linked by a stable emotional or family relationship up to the fourth degree**;
- ix. **colleagues with an ongoing habitual relationship** (i.e. friendship) with the reporting person;
- x. **entities** owned by the Whistleblower (either exclusively or in majority partnership with third parties) or where the Whistleblower works or which operate in the same work environment as the Whistleblower (e.g. in the case of Partnerships)

(hereinafter jointly referred to as “**Persons Involved**”), as well as

- xi. the person who reports to the judicial or accounting authorities or publicly discloses the Whistleblowing Report and
- xii. anonymous Whistleblowers whose identity is subsequently learned and who have suffered retaliation.

### 3 Content of Reports

Reports - which must be made in good faith and not used to speak out against exclusively personal situations - can only be taken into account if corroborated by **factual circumstances** or precise and concordant evidence, in order to enable the Whistleblowing Function to carry out the necessary checks. Mere suspicions or “rumours” are not sufficient.

Evidence is considered “precise” when it is not open to interpretation, while it is “concordant” when several indicators point in the same direction.

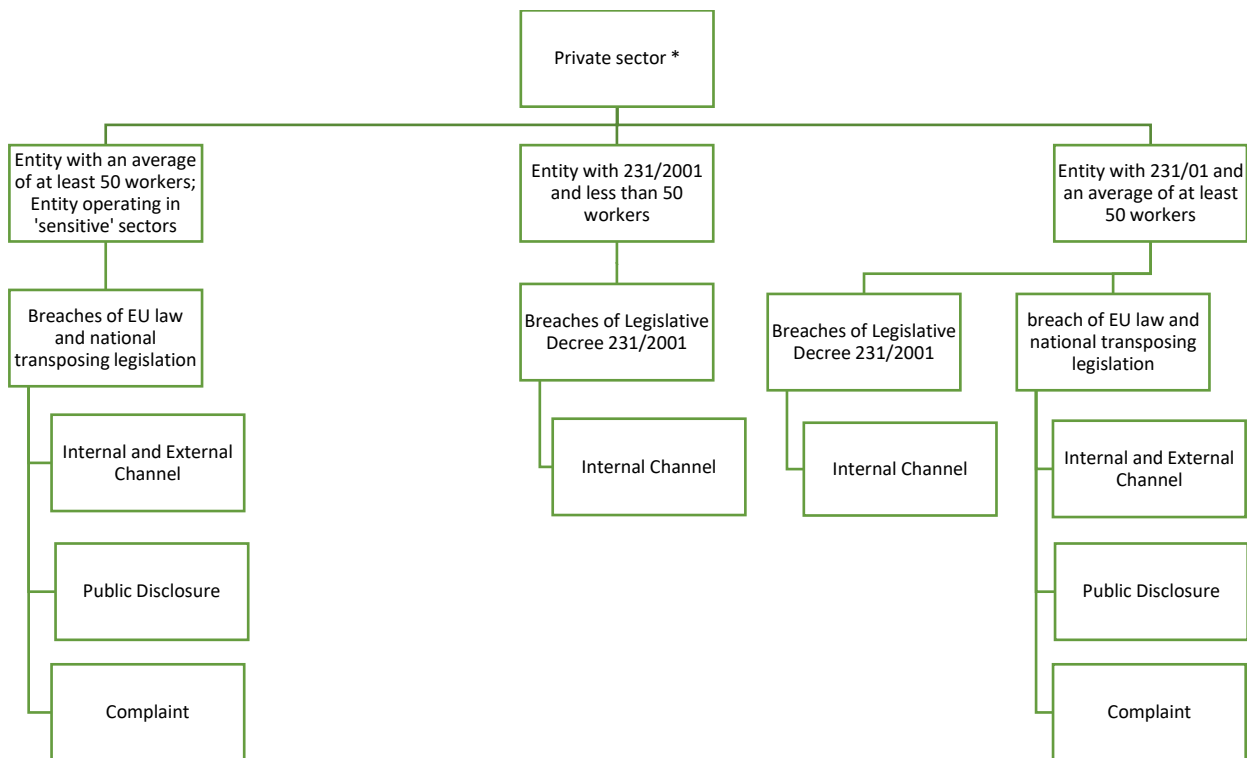
The Report must provide:

- a. a description of the fact and the circumstances of time and place;
- b. the personal details or other information enabling the identification of the Reported Person;
- c. the identification data of the Whistleblower (name, surname, place and date of birth) in case of Whistleblowing Reports. If the Whistleblower does not provide their identification data, the Report will be treated as an Ordinary Report.

In any event, in order for the safeguards afforded to the Whistleblower to be effective, it is sufficient that, at the time of the Report (or of External Reports, Public Disclosure and Complaint to the Authority), the Whistleblower had a **reasonable belief** that the information on the reported breach was true and fell within the objective scope of application of the Whistleblowing Procedure.

#### 3.1 Objective and subjective scope of Whistleblowing Reports.

With regard to Whistleblowing Reports, it should be noted that the breaches, conduct and behaviours that can potentially be reported, as well as the practical procedures for submitting them, vary according to the size limits of the Prelios Group Company concerned from time to time. In order to facilitate understanding of the limits and conditions imposed on Whistleblowing Reports, an outline is provided below of what private sector actors can report and through which channels.



\* Table extracted from Chapter 3.5, Part One of the ANAC Guidelines

#### 4 Whistleblowing Portal and other ways of reporting

Reports can be submitted, in **written** or **oral** form, through the **Whistleblowing Portal** accessible via the internet at the following URL:

<https://digitalplatform.unionefiduciaria.it/whistleblowingnew/it/accessoprincipale/identificazionegruppo?TOKEN=PRELIOS>

The Whistleblowing Portal - accessible from both PCs and mobile devices and available 24/7 - is designed, set up and managed to ensure the confidentiality of the Whistleblower's identity, the protection of the Persons Involved and the Whistleblower, and to prevent access by unauthorised personnel. Any data concerning the Whistleblower may be spontaneously provided by the Whistleblower in the relevant notes field.

For further details on the technical-practical operation of the Whistleblowing Portal, please refer to the technical manual published at the following link: <https://prelios.com/it/governance/compliance/whistleblowing>.

Reports may also be submitted:

- A. by letter sent by **ordinary post** addressing the Internal Report to the address below:

***“To the kind attention of the Whistleblowing Function.***

*(REFERENCE COMPANY)*

*Via Valtellina, 15/17*

*20159 Milan (MI)”*

In the case of Reports sent in the above-mentioned paper form - and in order to ensure proper traceability of all Reports received - the competent Whistleblowing Function is expected to manually record the receipt of each Report in the Report Register within the Whistleblowing Portal.

- B. in **oral form** (without prejudice to the possibility of recording an audio directly on the Whistleblowing Portal) by means of a **face-to-face meeting** with the competent Whistleblowing Function within a reasonable time communicated to the Whistleblower with Acknowledgement of Receipt. Subject to the Whistleblower's consent, the meeting may be recorded by suitable means for storage and listening. Otherwise, appropriate minutes of the meeting will be drawn up, to be signed by the Whistleblowing Function and the Whistleblower (who will receive a copy).

In any event, the safeguards afforded by these Operational Rule will apply to all Reports received through channels other than the Whistleblowing Portal or addressed to persons other than the Whistleblowing Function (e.g. to the Supervisory Body's email address or to the Board of Statutory Auditors), where the Whistleblower has expressly stated their wish to benefit from the whistleblowing safeguards or where this intention can be inferred from the Report itself (e.g. by reference to the relevant legislation), with the consequent obligation for the recipient to forward the communication, **within 7 days**, to the competent Whistleblowing Function, simultaneously notifying the Whistleblower.

#### 4.1 Submitting the Report

The Whistleblowing Portal provides a guided path for the Whistleblower, through a series of open and closed, mandatory or optional questions with the aim of, *inter alia*:

- a. identifying the Prelios Group Company to which the breach refers and therefore the competent Whistleblowing Function;
- b. determining whether the matter concerns unlawful conduct within the meaning of Legislative Decree 231/2001 or breach of the MOG231, with the consequent involvement of the competent Supervisory Body;
- c. reporting whether the breach concerns and/or involves in any way one of the members of the Whistleblowing Function or the Supervisory Body;
- d. helping the Whistleblower to choose between a written or oral Report;
- e. assisting the Whistleblower in providing (also by means of documents to be attached) any useful information such as facts, time frame, personal details of the Reported Person or other information enabling their identification;
- f. informing the Whistleblower that, in order to benefit from the more favourable safeguards provided for by Legislative Decree 24/2023, they are asked to provide their personal details, in the absence of which the Report will be treated as anonymous and therefore as an Ordinary Report.

At the end of the Report, the Whistleblower will be issued with a code (hereafter "**Reporting Code**"), which it must keep, and which cannot be retrieved in the event of loss, also in order to guarantee the full confidentiality of the information sent.

Using the Reporting Code, the Whistleblower will then be able to connect to the Whistleblowing Portal in order to monitor the progress of their Report and, if necessary, to liaise directly with the competent Whistleblowing Function, enabling *i*) the competent Whistleblowing Function to request more detailed or supporting information on the Report, or *ii*) the Whistleblower to send messages (always confidentially) in order to set out any doubts as to the correct classification of the reported case, or to supplement the Report with evidence that subsequently emerged.

For a more effective guarantee of the Whistleblower's confidentiality, no information and/or communication will be forwarded to them using tools and means other than the Reporting Channel. Any activity related to the management of the Report will be communicated and tracked within the Reporting Channel.

#### 4.2 Managing the Report

**Within seven days** of receipt of the Report, the competent Whistleblowing Function sends an Acknowledgement of Receipt to the Whistleblower via the Reporting Channel.

The competent Whistleblowing Function follows up the Report by verifying the existence of the essential requirements and assessing its admissibility. The Report is considered **inadmissible** and therefore dismissed with notice of reasons, in the following cases:

- a. manifest lack of foundation due to the absence of facts attributable to the infringement;
- b. manifest non-existence of the conditions for the applicability of the Whistleblowing Procedure. In this regard, the competent Whistleblowing Function will have to assess whether the subject of the dispute falls within Whistleblowing Reports or Ordinary Reports;
- c. non-specific content of the Report making it impossible to understand the facts, or inappropriate or irrelevant documentation making it impossible to understand the content of the Report, without prejudice to the right to request additional documentation;
- d. production of documentation only without reporting unlawful conduct.

Having assessed admissibility, the competent Whistleblowing Function initiates the internal investigation of the reported facts or conduct to assess the existence of breaches, possibly involving other competent corporate functions, depending on the case and its needs, while still respecting the principles of confidentiality. In such a case, in order to guarantee the confidentiality obligations required by the legislation, the Function will ensure that any data that might allow the identification of the Whistleblower or of any other Person Involved are redacted. In any case, the confidentiality obligations expressly provided for will also be extended to the other functions, and the necessary privacy designations ensured, the breach of which constitutes a disciplinary offence.

The competent Whistleblowing Function undertakes, without delay and in any case **within three months** from the date of the Acknowledgement of Receipt, to provide the Whistleblower with feedback, which may consist in a duly motivated communication of dismissal; in a purely interim communication requesting additional documentation or information; in the initiation of an internal investigation and possibly the relevant findings, such as the ascertainment of the well-founded nature of the Internal Report; in the measures adopted to deal with the matter raised, such as transmission to the competent internal bodies or referral to the competent authority for further investigation.

Upon conclusion of the analysis and verification activities, if the Report proves to be well-founded, the competent Whistleblowing Function will:

- a. give written notice, supported by documentary evidence, to the governing bodies of the Company within which the unlawful conduct took place and, of course, to its Supervisory Body if not already involved;
- b. activate the competent internal functions and bodies to adopt any measures deemed appropriate and actions to protect the Company involved and the Prelios Group;
- c. in the event of a lack of competence, forward all the evidence to the competent external authorities to ascertain the individual responsibilities that have arisen, whatever nature they may be.

Upon completion of this activity, the competent Whistleblowing Function informs the Whistleblower through the Whistleblowing Portal and closes the Report.

## 5 Safeguards and support measures

For the benefit of the Whistleblower, the person making a Public Disclosure or a Complaint to the Authority and the Persons Involved, a protection system is in place, which includes:

- i. protection of **confidentiality**,
- ii. protection against possible **retaliation** and
- iii. with regard to Whistleblowing Reports, **limitations of liability** with regard to certain categories of information and when precise conditions have been met.

Waivers and settlements of the rights and means of reporting and protection in question are also prohibited, unless they are signed in a protected setting (e.g. with agreements in court or before the Territorial Labour Directorate or with trade unions or before conciliation panels or informal arbitration).

### 5.1 Protecting the Whistleblower's confidentiality and personal data

The identity of the Whistleblower, the Reported Person and the persons involved or mentioned in the Report cannot be disclosed to persons other than those competent to receive or follow up the Reports, who have been authorised in accordance with Article 29 GDPR to process personal data for this purpose and have received appropriate training in accordance with the data protection legislation.

This protection also covers all the elements of the Report from which the Whistleblower, the Reported Person and the persons involved or mentioned in the Report could be directly or indirectly identified.

In view of the above, the Whistleblower's identity cannot be revealed even during disciplinary proceedings that are fully or partially based on the Report or on investigations that are separate from and additional to the Report, even if arising from the Report. If, however, knowledge of the Whistleblower's identity is essential to the defence of the person accused, the Report can be used for the purposes of the disciplinary proceedings, provided that the Whistleblower has given their **express consent** to the disclosure of their identity and written notice of the **reasons for such disclosure** has been provided. The above also applies in proceedings brought as a result of internal or external reports where such disclosure is also essential for the defence of the person concerned.

The Whistleblower's confidentiality is also guaranteed:

- a. when the Report is received by personnel other than those authorised and competent to handle Reports, to whom the Reports must be transmitted without delay;
- b. in the case of internal or external reports made orally through voice messaging systems or, at the Whistleblower's request, through a face-to-face meeting with the person handling the Report.

To this end, Reports managed with IT tools are processed using encryption/cryptographic techniques and in any case in compliance with the Privacy Organisational Model adopted by Prelios Group Companies.

Any processing of personal data carried out under the Whistleblowing Procedure is carried out in compliance with the GDPR. Personal data that are clearly of no relevance to the processing of a specific Report are not collected or, if collected accidentally, are deleted without delay.

Without prejudice to the above, the Reported and Involved Persons may not exercise - for as long as and to the extent that this constitutes a necessary and proportionate measure - the rights of access to personal data, rectification, deletion, limitation, data portability and objection to processing, and of complaint to the Personal Data Protection Authority, if their exercise could actually and specifically undermine the protection of the confidentiality of the Whistleblower's identity.

Breach of confidentiality constitutes a **disciplinary offence** under the Sanctions System set out in MOG231. The disciplinary procedure and any resulting sanctions are consistent with the relevant company procedures, as well as with the provisions of the reference CCNL. This is without prejudice to further responsibilities provided for in the applicable legislation.

The Reports and the related documentation are kept for as long as required to process the Report and in any case **no longer than five years** from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in European and national data protection legislation.

The aforementioned retention period does not apply to the subsequent handling of the Report by the competent bodies activated by the Whistleblowing Function following a Report deemed well-founded in order to take the actions deemed appropriate. In that case, the different retention period regulated in the Data Retention Policy of the Privacy Organisation Model applies.

### 5.2 Prohibition of retaliatory conduct

Any conduct, act or omission against the Whistleblower and the Persons Involved, even if only attempted or threatened, carried out as a result of the Report, the Complaint to the Judicial Authority or the Public Disclosure and causing or likely to cause, directly or indirectly, unjust damage to the Whistleblower and the Persons Involved, is prohibited. Examples of retaliatory conduct include, but are not limited to:



- dismissal, suspension or equivalent measures;
- relegation in grade or non-promotion;
- change of duties, change of workplace, reduction of salary, change of working hours;
- suspension of or restricted access to training;
- negative merit notes or negative references;
- adoption of disciplinary measures or other sanctions, including fines;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavourable treatment;
- failure to convert a fixed-term employment contract into a permanent employment contract, where the employee had a legitimate expectation of such conversion;
- non-renewal or early termination of a fixed-term employment contract;
- damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- inclusion in improper lists on the basis of a formal or informal sector or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- early termination or cancellation of the contract for the supply of goods or services;
- cancellation of a licence or permit;
- request for referral for psychiatric or medical evaluation.

The Prelios Group Companies reserve the right to take appropriate **disciplinary or punitive measures** against anyone who commits, or threatens to commit, retaliatory acts, without prejudice to the right of those entitled to legal protection in the event that the Whistleblower is found to be criminally or civilly liable for declaring or reporting false information.

The safeguards are not guaranteed when the Whistleblower has been found criminally liable for offences of defamation or slander or for the same offences committed with the Report to the Judicial or Accounting Authorities, or civilly liable for reporting and/or disclosing false information with intention or negligence, even by a non-final judgment of first instance.

It is understood that the Prelios Group Companies may take the most appropriate **disciplinary** and/or legal **measures** to protect their rights, assets and image, against anyone who, in bad faith, has made false, unfounded or opportunistic Reports and/or with the sole purpose of slandering, defaming or harming the Reported Person or the other persons mentioned in the Report. Any other case of intentional exploitation of the Reporting Channel also constitutes a source of liability, in disciplinary and other competent fora.

### **5.3 Whistleblowing Reports - Limitations of criminal, civil, administrative or disciplinary liability for specific categories of information**

With specific reference to Whistleblowing Reports, criminal, civil, administrative or disciplinary liability is excluded for the breach *i)* of the obligation of official or professional or scientific and industrial secrecy<sup>3</sup>, *ii)* of the duty of loyalty and faithfulness pursuant to Article 2105 of the Civil Code, *iii)* of copyright, *iv)* of the rules on the protection of personal data as well as in the event of *v)* offence to the reputation of the person involved, when the Whistleblower (as well as the person making an External Report, a Public Disclosure or a Complaint to the Authority):

- a. has reasonable grounds to believe that disclosure or dissemination is necessary to disclose the breach
- b. and has complied with the conditions set out in these Guidelines.

The limitations on liability do not however operate with regard to the regulations *(i)* on classified information, *(ii)* on national defence and public order and security, *(iii)* on forensic and medical professional secrecy, *(iv)* on secrecy of the decisions of judicial bodies and on provisions relating to the legal position of such bodies, and *(v)* on trade union consultations.

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<sup>3</sup> Respectively, Articles 326, 622, 623 of the Criminal Code

#### 5.4 Protection of the Reported Person

With due respect for their right of defence, the Reported Person may be heard, at their request, by means of a paper procedure through the acquisition of written comments and documents. If such a procedure is initiated, the Reported Person has the right to be informed of the Report concerning them; however this right does not apply in the phases preceding the procedure and therefore during the verification and analysis of the Report.

This is without prejudice to the Whistleblower's criminal and disciplinary liability in the event of libellous or defamatory Reports under the Criminal Code and Article 2043 of the Civil Code.

Any form of abuse of the Reporting Channel, such as clearly opportunistic reports and/or reports made with the sole aim of harming the Reported Person or other persons, and any other case of improper use or intentional exploitation, shall also give rise to liability in **disciplinary and other competent fora**.

#### 6 Whistleblowing Reports and external reporting channels

Lastly, Whistleblowing Reports can be made through the external reporting channel set up and managed by ANAC and available at the following link <https://whistleblowing.anticorruzione.it/-/whistleblowing>, when:

- a. it is not mandatory in the work environment to activate an internal reporting channel or, even if mandatory, the channel is not active or, even if activated, it does not comply with the legal requirements;
- b. a Report has already been made through the Reporting Channel set up by the Prelios Group but has not been followed up;
- c. there are well-founded reasons to believe that if a Report was made through the Reporting Channel set up by the Prelios Group, it would not be effectively followed up or it could give rise to a risk of retaliation;
- d. there are well-founded reasons to believe that the breach could constitute an imminent or manifest danger to the public interest.

Whistleblowing Reports notifying of retaliation suffered by the Whistleblower, if mistakenly transmitted to Prelios Group Companies, will be forwarded to ANAC within 7 days from the date of their receipt, guaranteeing the confidentiality of the Whistleblower's identity and notifying the same of the transmission to the competent authority.

The Whistleblower may make a direct **Public Disclosure** when the following conditions are met:

- e. they have previously made an internal and external Whistleblowing Report or have directly made an external Whistleblowing Report and have not received feedback within the established time limits for the measures envisaged or adopted to follow up Whistleblowing Reports;
- f. they have well-founded reasons to believe that the breach may constitute an imminent or manifest danger to the public interest;
- g. they have well-founded reasons to believe that the external report may entail a risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as where evidence may be concealed or destroyed, or where there is a well-founded fear that the recipient of the report may be colluding with the perpetrator of the breach or involved in the breach.

Whistleblowing Reports must be made in the public interest or in the interest of the integrity of the public administration or the private entity.

The reasons that led the person to report, denounce or publicly disclose are irrelevant for the purposes of their protection.

#### 7 Ordinary Reports - Specific areas of application

The Prelios Group's Reporting Channel has also been set up to support the reporting obligations laid down in the sectoral regulations referred to below, as well as in the event of anonymous reports or those concerning disputes, claims or requests linked to a purely personal interest.

It is understood that the most advantageous safeguards and support measures granted by Legislative Decree 24/2023 to the Whistleblower, the Persons Involved and the Reported Person will apply only to Whistleblowing Reports, except where the safeguards and support measures in question are expressly referred to in the special rules.

### **7.1 Reports of anti-money laundering violations pursuant to Article 48 of Legislative Decree 231/2007 as amended and supplemented**

Pursuant to Article 48, Legislative Decree 231/2007, the employees and collaborators of Prelios Credit Servicing S.p.A., Prelios Credit Solutions S.p.A., Prelios Società di Gestione del Risparmio S.p.A. and Prelios Agency S.p.A. may report any potential or actual violation of the provisions laid down to prevent money laundering and terrorist financing pursuant to Legislative Decree 231/2007 and the relevant corporate procedures adopted by those companies (to which reference is made for any further details), through the Reporting Channel.

The following are however guaranteed:

- a) protection of the confidentiality of the identity of the Whistleblower and the Reported Person, without prejudice to the rules governing investigations and proceedings initiated by the judicial authorities in relation to the facts that are the subject of the Reports. The Whistleblower's identity may only be disclosed with their consent or when knowledge is essential to the Reported Person's defence;
- b) protection of the Whistleblower against retaliatory, discriminatory or otherwise unfair conduct as a result of the Report;
- c) possibility of making anonymous Reports.

These Reports do not, in themselves, constitute a breach of the obligations arising from the contractual relationship.

### **7.2 Reports of violations, possible violations of regulations and management anomalies pursuant to Articles 52-bis and 52-ter of the Consolidated Banking Act (TUB) and Articles 4-undecies and 4-duodecies of the Consolidated Finance Act (TUF).**

The employees and collaborators of Prelios Credit Servicing S.p.A. and Prelios Società di Gestione del Risparmio S.p.A., depending on the regulations applicable to them from time to time, may report acts and facts constituting regulatory violations and irregularities of a managerial nature relating to the specific activities of the aforementioned companies through the Reporting Channel.

The following are however guaranteed:

- a) protection of the confidentiality of the personal data of the Whistleblower and the Reported Person, without prejudice to the rules governing investigations and proceedings initiated by the judicial authorities in relation to the facts that are the subject of the Reports. The Whistleblower's identity may only be disclosed with their consent or when knowledge is essential to the Reported Person's defence;
- b) protection of the Whistleblower against retaliatory, discriminatory or otherwise unfair conduct as a result of the Report.

Except in cases of liability for slander or defamation, or for the same offence pursuant to Article 2043 of the Civil Code, such reports do not, in themselves, constitute a breach of the obligations arising from the contractual relationship.

These Reports may also be made through the dedicated channels set up by the **Bank of Italy** at the following link: <https://www.bancaditalia.it/compiti/vigilanza/whistleblowing/index.html>. The Bank of Italy ensures the confidentiality of the Whistleblower's personal data, also in order to protect them from possible retaliation, as required by the relevant legislation.

Even those who are not employees or collaborators of entities supervised by the Bank of Italy (and therefore of Prelios Credit Servicing S.p.A. and Prelios Società di Gestione del Risparmio S.p.A.) may submit Reports

on possible breaches of regulations or alleged management anomalies found at such intermediaries, which are referred to as *Company Reports*.

The information collected is processed by the Bank of Italy, ensuring the protection of the Whistleblower's privacy.

The procedures for submitting Reports are stated on Bank of Italy's website indicated above.

### **7.3 Reports pursuant to Article 4-duodecies(1-bis), TUB, of violations of the MAR and/or the Prospectus Regulation.**

Where applicable, employees and collaborators of Prelios Società di Gestione del Risparmio S.p.A. may, pursuant to Directive 2392/2015 on the MAR on market abuse, send reports on alleged violations of the aforesaid regulation through the Prelios Group's Reporting Channel as well as through the whistleblowing channel set up by Consob according to the procedures stated in this link: <https://www.consob.it/web/area-pubblica/whistleblowing..>

### **7.4 Management System for the Prevention of Corruption**

Employees and collaborators of Prelios Group Companies may use the Reporting Channel to report, in good faith or on the basis of a reasonable belief, attempted, presumed or actual acts of corruption, or any breach or deficiency concerning the Management System for the Prevention of Corruption and, therefore, the Anti-Corruption Policy. Reports may also be made anonymously.

The competent Whistleblowing Function will promptly notify the Anti-Corruption Department of any relevant Report on corruption, except in cases where such notification may prejudice the investigation and the purpose of the Report itself. Any decision must be taken by the Whistleblowing Function in coordination with the Anti-Corruption Department.

The Whistleblowing Function will treat the reports confidentially, so as to protect the identity of the Whistleblower and of the Persons Involved, who are protected against any retaliatory act as a consequence of the Report they submitted.