

WHISTLEBLOWING POLICY

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1. PURPOSE

The procedure aims to regulate the process of transmission, reception, analysis, and management of reports, including the archiving and subsequent deletion of both the reports and related documentation, in accordance with the methods outlined in this document.

The procedure also aims to implement Legislative Decree March 10, 2023, no. 24, published in the Official Gazette on March 15, 2023, which incorporates Directive (EU) 2019/1937 concerning "the protection of persons who report violations of Union law (the so-called Whistleblowing discipline)."

For matters not explicitly covered by this procedure, the provisions of the aforementioned Legislative Decree remain fully applicable.

The aforementioned legislation provides, in summary:

- A protective regime for specific categories of individuals reporting information acquired in the work context concerning violations of national or European Union legal provisions that harm public interest or the integrity of the entity.
- Protective measures, including a prohibition on retaliation, to safeguard the Reporter as well as Facilitators, colleagues, and relatives of the reporter and legal entities connected to the reporter.
- The establishment of internal reporting channels within the entity (including a digital one) for the transmission of reports that ensure, even through the use of encryption tools, the protection of the confidentiality of the identity of the Reporter, the Person involved and/or mentioned in the report, the content of the report, and related documentation.
- In addition to the option to file a complaint with the judicial or accounting authority, the possibility (if one of the conditions specified in art. 6, paragraph 1, of Legislative Decree no. 24/2023 is met) to make external reports through the channel managed by the National Anti-Corruption Authority (hereinafter ANAC), as well as the option to make public disclosures (if one of the conditions specified in art. 15, paragraph 1, of Legislative Decree no. 24/2023 is met), through the press or electronic means or dissemination capable of reaching a large number of people.
- Disciplinary measures as well as pecuniary administrative sanctions imposed by ANAC in cases provided for by articles 16 and 21 of Legislative Decree no. 24/2023.

2. RECIPIENTS

The recipients of this Procedure (hereinafter referred to as 'Whistleblowers') are:

- Top management and members of the corporate bodies of SOFTEAM S.p.A.
- Employees, former employees, and candidates for positions at SOFTEAM S.p.A., as well as, non-exhaustively, partners, suppliers (including subcontractors), consultants, and collaborators in the performance of their work at SOFTEAM S.p.A.
- Individuals with information on violations as defined in this Procedure.
- Physical and legal entities not included in the previous categories but to whom the protective measures provided by this Procedure apply.

It is specified that what is provided in this procedure applies:

- Even if the legal relationship has not yet begun, and information related to the Violation has been acquired during the selection phase or in pre-contractual stages.
- During the probationary period.
- After the termination of the legal relationship, provided that information about the Violations has been acquired in the Work Context.

What is provided in this document also applies to anonymous reports, provided they are adequately detailed, as defined in this Procedure.

3. FIELD OF APPLICATION

The Procedure applies to SOFTEAM S.p.A., which ensures its correct and consistent application, as well as maximum internal and external dissemination.

There is no exhaustive list of crimes or irregularities that can be the subject of whistleblowing. Reports concerning anomalies, irregularities, or crimes committed both in the interest and to the detriment of the entity are considered relevant.

- **WHAT CAN BE REPORTED**

The Legislative Decree No. 24/2023 establishes that the following are the subject of reporting, information concerning violations that harm public interest or the integrity of public administration or private entities, learned in the work context, in particular, but not limited to:

- Administrative, accounting, civil, or criminal offenses;
- Violations of the Code of Ethics;
- Violations of the provisions of Legislative Decree No. 24/2023 itself;
- Violations of Contractual provisions, Policies, Company Rules, and Procedures;
- Any violation of current or future national and international Laws and Regulations;
- In general, any behavior, act, or omission that may cause harm or damage, including image, to the company;
- Offenses falling within the scope of acts of the European Union or national legislation relating to the following sectors: public procurement; services, products, and financial 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 Union;
- Acts or omissions concerning the internal market;
- Acts or behaviors that undermine the purpose or objective of the provisions of Union acts.

Reports must be made in good faith and must be detailed with precise information to be easily verifiable.

- **WHAT SHOULD NOT BE REPORTED**

With reference to the exclusions indicated in Legislative Decree no. 24/2023 and in the "Guidelines" issued by the National Anti-Corruption Authority (ANAC) approved by Resolution no. 311 of 12/07/2023, the following are not included among the other information that can be reported and denounced:

- News blatantly lacking foundation, information that is already entirely public domain, as well as information acquired solely based on poorly reliable rumors or gossip (so-called corridor talks) or in any case learned outside the working context. This is because it is necessary to take into account the interest of third parties mentioned in the report and to avoid the entity from conducting internal inspections that are of little use and, in any case, costly.
- Disputes, claims, or requests related to the personal interests of the whistleblower and exclusively concerning their individual employment relationships or relationships with hierarchically superior figures. For example, reports concerning labor disputes, discrimination among colleagues, interpersonal conflicts between the reporting person and another worker, complaints related to contractual and salary classification, etc., are therefore excluded.
- Facts or circumstances falling under the application of national or European Union provisions on classified information, lawyer or medical secrecy, and confidentiality of judicial deliberations, or falling under the application of national provisions on criminal procedure, autonomy and independence of the judiciary, provisions on the functions and attributions of the Superior Council of the Judiciary, in matters of national defense and public order and safety, as well as in matters of exercise and protection of workers' right to consult their representatives or unions, protection against unlawful conduct or acts

carried out due to such consultations, autonomy of social parties and their right to conclude collective agreements, as well as the repression of anti-union conduct.

- Violations mandatory under acts of the European Union or national regulations, as indicated in art. 1, co. 2, lett. b), of Legislative Decree no. 24/2023 (in the field of services, products and financial markets, and prevention of money laundering and terrorist financing, transport safety, and environmental protection).
- Commercial complaints, for which direct contact with the relevant sales representative is recommended.
- Requests for the exercise of rights regarding the protection of personal data against the company, pursuant to EU Regulation no. 2016/679 (General Data Protection Regulation - GDPR) and Legislative Decree 30 June 2003 no. 196 (Personal Data Protection Code) and Legislative Decree 10 August 2018, no. 101 and subsequent amendments and additions.

It is specified that in the case of unfounded reports that prove to be defamatory and slanderous, SOFTEAM S.p.A. reserves the right to act in defense of its interests and the damaged parties, including from a disciplinary perspective.

4. MANAGEMENT

SOFTEAM S.p.A. has identified a third party with characteristics of independence and autonomy as the 'Manager' of reports and therefore of the entire process of managing them, while maintaining the responsibilities and prerogatives of the Board of Statutory Auditors regarding reports addressed to them.

SOFTEAM S.p.A. has established the 'Whistleblowing Committee' consisting of the following individuals in office pro tempore:

- Chief Executive Officers BALZARETTI MARIO - GATTINONI ROBERTO – VANINI PAOLO
- Administrative Manager GATTINONI ANNALISA
- Human Resources Manager FERRARA GRETA

The Manager will communicate to the Whistleblowing Committee all reports received through the platform and/or other communication channels (email, external reports, and/or public disclosure) for their management and to take appropriate actions in compliance with current regulations.

Management of conflicts of interest

The procedure must ensure that the management of the report is exclusively entrusted to individuals who are not in situations of conflict of interest.

The Manager and/or members of the Whistleblowing Committee, if they consider themselves in a conflict of interest regarding the received report, are required to:

- Declare their conflict of interest situation;
- Refrain from handling the report.

In case of any doubts about the existence of their conflict of interest, they will delegate the evaluation and decision to the Manager and/or other members of the Whistleblowing Committee.

REPORT MANAGEMENT PROCESS

Preliminary assessment of the Report

Upon receiving the Report, the Manager:

- a) conducts a preliminary analysis of its content, if deemed appropriate, possibly with the support of specialized external consultants, to assess its relevance in relation to the scope of the Whistleblowing Decree and, in general, the Procedure;
- b) archives the Report if deemed inadmissible under the Whistleblowing Decree and this Procedure, such as:
 - manifest lack of foundation due to the absence of factual elements attributable to the specified violations;
 - ascertained generic content of the report of wrongdoing that does not allow understanding of the facts, or a report of wrongdoing accompanied by inappropriate or irrelevant documentation that does not clarify the content of the report;

- sole production of documentation without the report of illicit conduct. In this case, the Manager must provide written justification to the Reporter for the reasons for archiving;
- c) in the case of 231 Reports, it is transmitted and shared with the Committee, with communication to the Reporter. As provided for in Article 4 of the Whistleblowing Decree, a Report submitted to a subject other than the Manager must be transmitted immediately (within seven days) to the latter, with simultaneous notification to the Reporter.

Inquiry

The report management follows the provisions of this Procedure.

The Manager performs the following activities:

- a) Issues an acknowledgment of receipt to the Reporter within seven days of receiving the report;
- b) Maintains communication with the Reporter and, if necessary, requests additional information;
- c) Diligently follows up on received reports;
- d) Provides a response to the report within three months from the acknowledgment of receipt or, in its absence, within three months from the expiration of the seven-day period from the submission of the report.

For 231 Reports, the Manager conducts these activities jointly with the Whistleblowing Committee, including through joint meetings, respecting the confidentiality requirements of the Whistleblowing Decree and this Procedure.

The Manager may seek support from internal functions or specialized external consultants, respecting confidentiality requirements.

The Manager may also request clarifications or additions from the Involved Person during the report management activities.

The Reporter has the opportunity to provide additional information if the reported incident has continued, ceased, or worsened.

Reports (and related documentation) are kept by the Manager for the time necessary for their processing, but not exceeding five years from the date of the final outcome communication.

Internal investigation activities

To assess a report, the Manager may conduct the necessary internal investigations directly or by appointing an internal or external party – ensuring confidentiality.

For 231 reports, the Manager conducts these investigative activities jointly with the Whistleblowing Committee.

Closing the report

The evidence collected during internal investigations is analyzed to understand the context of the report, determine if a violation has occurred under this Procedure and/or the Whistleblowing Decree, and identify disciplinary measures or corrective actions. If a violation is confirmed, the Manager – jointly with the Whistleblowing Committee – may:

1. Initiate a sanctioning procedure against the Involved Person, following applicable regulations, collective bargaining if applicable, and the Model 231;
2. Evaluate – together with other relevant company functions – the feasibility of initiating disciplinary proceedings against the Reporter if bad faith and/or defamatory intent is confirmed, supported by the unfounded nature of the report;
3. Coordinate with the business function affected by the violation to develop an action plan for addressing identified control weaknesses, ensuring monitoring of its implementation.

5. VERIFICATION ACTIVITIES REGARDING THE VALIDITY OF THE REPORT

The activities related to verifying the accuracy of the circumstances presented in the report fall under the responsibility, subject to any specific local laws, of the Manager in conjunction with the Whistleblowing Committee. The Manager is tasked with conducting a prompt and thorough investigation, adhering to principles of impartiality, fairness, and confidentiality towards all involved parties.

During the verification process, the Manager may seek the support of relevant company functions and, if deemed appropriate, external consultants specialized in the subject matter of the report. Their involvement should contribute to clarifying the report, ensuring confidentiality, and, if possible, anonymizing personal data contained in the report.

Upon completion of the verification phase, the Manager prepares a summary report of the investigations and the evidence obtained. Depending on the results, this report is shared with the relevant company functions to define any intervention plans and actions to protect the company. The Manager also communicates the results of the investigations and verifications conducted for each report to the heads of the company structures concerned by the contents of the report.

Alternatively, if the analyses conclude that there is a lack of sufficiently detailed elements or, in any case, that the facts referred to in the report are unfounded, the report will be archived. The Manager, in conjunction with the Whistleblowing Committee, provides the reasons for archiving the report.

The Manager periodically reports on the types of reports received and the outcomes of the investigation activities to the Board of Directors.

6. REPORT SUBJECT

The reported illicit behaviors must concern situations of which the individual has come directly aware due to the employment relationship, encompassing information acquired during the performance of work duties, even incidentally.

In this perspective, it is advisable for the reports to be as detailed as possible, providing the maximum number of elements to allow the body responsible for managing them to conduct the necessary verifications.

For "Report," we mean the communication of possible illicit behaviors, acts, or omissions that constitute or may constitute a violation, or inducement to violate laws and/or regulations, values, and/or principles enshrined in SOFTEAM S.p.A.'s Code of Ethics, internal control principles, as well as in company procedures and/or rules.

The whistleblower must provide all relevant information to enable the Manager and the Whistleblowing Committee to carry out the necessary and appropriate internal checks and investigations to verify the validity of the reported facts.

To this end, the report should preferably contain the following elements:

- Personal details of the individual making the report, with an indication of the position or role within the company;
- A clear and complete description of the reported facts;
- If known, the time and place where the facts were committed;
- If known, the personal details or other elements (such as the position and department where the activity is carried out) that can identify the individual(s) who committed the reported facts;
- Indication of any other individuals who can provide information on the reported facts;
- Indication of any documents/other evidence that can confirm the validity of these facts;
- Any other information that may provide useful confirmation of the existence of the reported facts.

7. REPORTING METHODS

Reports can be made through any of the channels described below:

- Through an internal channel;
- Through an external channel;
- Public disclosure.

7.1 INTERNAL CHANNEL REPORTING

Reports can be made through any of the internal channels described below:

- Electronically, by accessing the web reporting platform available on the company's website www.softeam.it (dedicated Whistleblowing page);
- Via email at the address: segnalazioni@softeam.it
- Orally, upon the whistleblower's request: through a direct meeting with the Manager or any member of the Whistleblowing Committee within a reasonable timeframe. In this case, with the whistleblower's consent, the report is documented through audio recording or minutes. In the case of minutes, the whistleblower has the right to review the document and request corrections or confirm its content by signing;
- By regular mail addressed to the Manager of SOFTEAM S.p.A. at the company's registered office.

WEB platform dedicated to reports

SOFTEAM S.p.A. uses the Trusty platform, which ensures adequate levels of encryption and confidentiality, as required by Legislative Decree 24/2023.

The web platform allows creating and updating an "electronic file" of the report by entering different status updates (e.g., received, open, proposed for archiving, archived, under investigation/audit, etc.), as well as uploading supporting documents (such as interim reports, final reports to complete the investigation by the responsible body, etc.).

Unless otherwise justified, only the Manager can access both the number and content of the reports. The company's web platform dedicated to reports does not allow users, in particular, to delete the report logs.

The platform includes adequate IT backup procedures for the reports, respecting reference best practices and privacy regulations. When the whistleblower submits a report, the Manager, through the platform, issues a receipt notice within seven days of the receipt date.

After evaluating the essential requirements of the report to assess its admissibility, if it is not necessary to request additional information from the whistleblower, they will be informed of the report's outcome through feedback within three months from the receipt notice date, or, in the absence of such notice, within three months from the expiration of the seven-day deadline from the report's submission.

7.2 EXTERNAL CHANNEL REPORTING

Reports can also be made through the reporting channel provided by the National Anti-Corruption Authority (ANAC) through its platform, available on the website <https://www.anticorruzione.it/-/whistleblowing>.

External reporting is allowed when, alternatively:

- The whistleblower has already made a report through the internal channel, but it has not been followed up because the whistleblower did not receive the receipt notice for the report and/or information on the report's management;
- The whistleblower has valid reasons to believe that if they make a report through the internal channel, it will not be followed up;
- The whistleblower has valid reasons to believe that if they make a report through the internal channel, they would be exposed to risks of retaliation;
- The whistleblower has a valid reason to believe that the violation may constitute an imminent or obvious danger to public interest.

7.3 PUBLIC DISCLOSURE

Public disclosure involves making information about violations public through the press, electronic means, or any other means of dissemination capable of reaching a large number of people.

As specified in the ANAC Guidelines approved by Resolution No. 311 of 12/07/2023, public disclosure of violations must comply with the conditions set by the legislator for the disclosing party to benefit from the protections recognized by the decree.

Therefore, protection will be granted if one of the following conditions is met at the time of disclosure:

1. An internal report, to which the Manager has not responded within the specified time frame (three months from the date of receipt notice, or in the absence of such notice, within three months from the expiration of the seven-day deadline from the submission of the report), is followed by an external report to ANAC, which, in turn, does not provide feedback to the whistleblower within a reasonable time (three months, or if justified and motivated reasons exist, six months from the date of receipt notice of the external report, or in the absence of such notice, from the expiration of the seven-day deadline).

2. The individual has already directly made an external report to ANAC, which, however, has not provided feedback to the whistleblower regarding the measures planned or taken to follow up on the report within a reasonable time (three months, or if justified and motivated reasons exist, six months from the date of receipt notice of the external report, or in the absence of such notice, from the expiration of the seven-day deadline).
3. The individual makes a direct public disclosure because they have a valid reason to believe, reasonably based on concrete circumstances alleged and information actually obtainable, and not on mere speculation, that the violation may constitute an imminent or obvious danger to public interest. This could include situations of emergency or the risk of irreversible harm, even to the physical well-being of one or more individuals, requiring the violation to be promptly exposed with broad resonance to prevent its effects.
4. The individual makes a direct public disclosure because they have valid reasons - within the above-mentioned terms - to believe that the external report may carry the risk of retaliation or may not be effectively followed up because, for example, there is a fear that evidence may be concealed or destroyed, or that the recipient of the report may be colluding with the author of the violation or involved in the violation itself. This includes cases where the recipient of the report, in agreement with the person involved in the violation, proceeds to archive the report in the absence of the necessary grounds.

In public disclosure, where the individual voluntarily reveals their identity, the protection of confidentiality is not relevant, while all other forms of protection provided by the decree for the whistleblower remain in place.

Where, however, the disclosure occurs using, for example, a pseudonym or a nickname that does not allow the identification of the discloser, ANAC will treat the disclosure as an anonymous report and will ensure its registration for preservation purposes. This is done to guarantee the whistleblower, if their identity is subsequently revealed, the protections provided in case of retaliation.

8. CONFIDENTIALITY, ANONYMITY, AND PROHIBITION OF RETALIATION

SOFTEAM S.p.A., while encouraging individuals to promptly report possible unlawful or irregular behaviors, ensures the confidentiality of the report and the data contained therein, as well as the anonymity of the reporter or anyone who submitted it, even if it later proves to be inaccurate or unfounded.

Anonymous reports received will be treated with the same promptness and diligence, following the same process as non-anonymous reports.

However, in such cases, the inability to confirm or investigate the reported facts may limit the Manager's ability to verify the content.

Therefore, the Company encourages individuals making reports to always make themselves available (even anonymously through the web platform) to answer any questions for a targeted and accurate investigation. In cases where the report is made through the web platform in anonymous mode, the system ensures the impossibility of identifying the reporter.

The web platform is not part of the Company's website or intranet but is entirely managed by a specialized third-party company.

The security system in place does not record or trace any data related to IP addresses, time, or metadata. All data provided by the reporter or entered into the system during the investigation process is encrypted and stored on secure servers within the European Economic Area.

The IT Department of the Company cannot view or trace any activity generated on the Whistleblowing Platform.

If the reporter's participation in the investigative process is necessary, efforts will be made to keep the fact that they were the reporter confidential. The same reporter will be protected from acts of retaliation or damages resulting from making a report.

Any form of threat, retaliation, sanction, or discrimination against the reporter and the reported individual or anyone who has collaborated in the verification activities regarding the validity of the report will not be tolerated.

SOFTEAM S.p.A. reserves the right to take appropriate actions against anyone who engages in, or threatens to engage in, acts of retaliation against those who have submitted reports in accordance with this Procedure, except for the right of the parties involved to protect themselves legally if the reporter is found to be criminally or civilly liable for the falsehood of the statements or reports.

It is understood that the Company may take appropriate disciplinary and/or legal measures to protect its rights, assets, and image against anyone who, in bad faith, has made false, unfounded, opportunistic

reports, or reports solely for the purpose of slandering, defaming, or causing harm to the reported individual or other parties mentioned in the report.

Except in cases where criminal liability for defamation and slander under Articles 368 and 595 of the Penal Code or civil liability under Article 2043 of the Civil Code is applicable, or in cases where anonymity is not legally contestable (e.g., in the execution of criminal investigations), the whistleblower's identity is protected in any context subsequent to the report.

Therefore, subject to the exceptions mentioned above, the identity of the whistleblower cannot be disclosed without their express consent, and all those who receive or are involved in managing the report are obliged to protect the confidentiality of this information.

The violation of the confidentiality obligation constitutes grounds for disciplinary liability, subject to additional forms of liability provided by the legal system.

Regarding the disciplinary proceeding, in particular, the whistleblower's identity may be disclosed to the disciplinary authority and the accused only in cases where:

- There is the express consent of the whistleblower.
- The disciplinary charge is well-founded, in whole or in part, on the report, and knowledge of the whistleblower's identity is absolutely essential to the defense of the accused, provided that this circumstance is asserted and proven by the accused during the hearing or by presenting documentation for defense purposes.

9. PERSONAL DATA PROCESSING

SOFTEAM S.p.A. informs that personal data (including any sensitive data, such as racial and ethnic origin, religious or philosophical beliefs, political opinions, membership in political parties or trade unions, as well as personal data revealing health status and sexual orientation) of whistleblowers and other involved parties, acquired in the course of managing reports, will be processed in full compliance with the current regulations on personal data protection, and in any case, in line with the provisions of GDPR 679/2016 and limited to those strictly necessary to verify the validity of the report and to manage it.

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| Purpose of Processing | Managing the received reports to carry out the necessary investigative activities aimed at verifying the validity of the reported information and, if necessary, taking appropriate corrective measures and initiating disciplinary and/or legal actions against those responsible for illicit conduct. |
| Data controller | SOFTEAM S.p.A. |
| Data processor | External Manager SGI Sistemi Gestione Integrata S.r.l. |
| Data processor | Trusty AG - Provider of the whistleblowing platform |

SOFTEAM S.p.A. ensures that the processing of personal data will also comply with the principles indicated by the ANAC Guidelines in Chapter 4.1.3 "The processing of personal data."

The processing operations may be entrusted to duly appointed collaborators as data processors, specifically trained in relation to the execution of whistleblowing procedures, with particular reference to security measures and the protection of the privacy of the parties involved and the information contained in the reports.

The personal data contained in the reports may be communicated by the Manager to the social bodies and to the internal functions competent at any given time, as well as to the Judicial Authority, for the purpose of activating the necessary procedures to ensure, as a result of the report, adequate judicial and/or disciplinary protection against the reported individual(s), where the collected elements and investigations

indicate the validity of the initially reported circumstances. In certain cases, the data may also be communicated to external specialized subjects.

During the activities aimed at verifying the validity of the report, all necessary measures will be taken to protect the data from accidental or unlawful destruction, loss, and unauthorized disclosure. Furthermore, documents related to the report will be stored, both in paper and electronic format, for the time necessary for the processing of the report and in any case, **not beyond five years** from the date of communication of the final outcome of the reporting procedure.

10. INFORMATION AND TRAINING

The information about this Procedure is made accessible and available to everyone, prominently displayed in workplaces, and also published in a dedicated section of the company's website. The information about the Procedure is also made available during the hiring process of an employee.

11. REFERENCES

Legislative Decree June 8, 2001, no. 231 ("Discipline of administrative liability of legal entities, companies, and associations, also without legal personality, pursuant to article 11 of Law September 29, 2000, no. 300");

Regulation (EU) no. 2016/679 (General Data Protection Regulation - GDPR);

Legislative Decree June 30, 2003, no. 196 (Personal Data Protection Code) and subsequent amendments and integrations, including Legislative Decree August 10, 2018, no. 101, as well as related legislative provisions;

Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (so-called Whistleblowing);

Legislative Decree March 10, 2023, no. 24, published in the Official Gazette on March 15, 2023, implementing Directive (EU) 2019/1937;

Whistleblowing Policy

12. GLOSSARY

ANAC: National Anti-Corruption Authority;

Committee: a body established to support the Manager in taking appropriate actions in compliance with current regulations, with the obligation of confidentiality regarding acquired information;

Work context: work or professional activities, present or past, carried out by Employees or Third Parties within the legal relationships established with the company;

Public disclosure: making information about violations public through the press or electronic means or in any case through dissemination methods capable of reaching a large number of people. Pursuant to art. 15, paragraph 1, of Legislative Decree no. 24/2023, the Whistleblower can make a public disclosure if one of the following conditions exists: i) has already made both an internal and external report, or has made an external report directly and no response has been received within the specified time regarding the measures envisaged or taken to follow up on the reports; ii) has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to public interest; iii) has reasonable grounds to believe that the external report may entail the risk of retaliation or may not have an effective follow-up due to the specific circumstances of the case, such as those 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 violation or involved in the violation itself;

Facilitator: the natural person who assists the Whistleblower in the Reporting process and operates in the same work context, and whose assistance must be kept confidential;

Manager: the subject responsible for receiving and managing reports through the Whistleblowing platform;

ANAC Guidelines: "Guidelines on the protection of persons reporting violations of Union law and protection of persons reporting violations of national legislative provisions. Procedures for the presentation and management of external reports." Issued by ANAC and approved by Deliberation no. 311 of 12/07/2023;

Information on violations: adequately substantiated information, including well-founded suspicions, concerning violations resulting from behaviors, acts, or omissions committed or which, based on concrete elements, could be committed, as well as elements concerning conduct, including omissive, aimed at concealing such violations. Also included are information about violations acquired in the context of a legal

relationship not yet started or meanwhile terminated, if such information has been acquired in the work context, including the probationary period, or in the selective or pre-contractual phase;

Organizational Model 231: the organizational, management, and control model pursuant to Legislative Decree no. 231/2001;

Supervisory Body: the Body appointed pursuant to art. 6, point 1, lett. b) of Legislative Decree no. 231/2001;

Involved person: the natural or legal person mentioned in the Report made through the internal or external channel, report, public disclosure, as the subject to whom the violation is attributed or attributable;

Employees: those who are bound to SOFTEAM S.p.A. by an employment relationship or occasional work performance as well as company executives and members of corporate bodies and the Supervisory Body, as defined above;

Whistleblower: the person who makes a Report through the internal or external Reporting channel, report, public disclosure;

Anonymous report: a report in which the Whistleblower's personal details are not specified or uniquely identifiable;

Detailed report: a report in which the information/assertions are characterized by a degree of detail sufficient, at least abstractly, to bring out specific and concordant circumstances and facts related to specific contexts, as well as to identify elements useful for verifying the validity of the Report itself (e.g., elements that allow identification of the person who committed the reported acts, the context, the place and time period of the reported circumstances, value, causes, and purposes of conduct, anomalies related to the internal control system, supporting documentation, etc.). Within Detailed Reports, information/assertions are distinguished as: i) "verifiable," where, based on the content of the Report, it is possible to concretely carry out verifications within the company on the validity, within the limits of activities and with the analysis tools available to Audit; ii) "non-verifiable," where, based on the analysis tools available, it is not possible to carry out verifications on the validity of the Report. Checks on circumstances and assessments related to intentional and/or subjective elements are subject to the limits of Audit activities and the related tools available;

External report: the written or oral communication of information about violations made by the Whistleblower through the external reporting channel activated by the National Anti-Corruption Authority (ANAC). Pursuant to art. 6, paragraph 1, of Legislative Decree no. 24/2023, the Whistleblower can make an external report if one of the following conditions exists: I) the obligatory activation of the internal reporting channel is not foreseen within their work context, or this, even if obligatory, is not active, or, even if activated, is not compliant; II) has already made an internal report and it has not had any follow-up; III) has reasonable grounds to believe that, if they were to make an internal report, it would not be given effective follow-up or would determine retaliatory conduct; IV) has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to public interest;

Internal report: the written or oral communication of information about violations made by the reporter through the internal channel;

Report related to significant facts: I) Report that concerns corporate executives and members of corporate bodies and the Supervisory Body; II) Report for which, even from preliminary analyses, serious violations of Organizational Model 231 can be configured, exposing the company to the risk of criminal-administrative liability pursuant to Legislative Decree no. 231/2021; III) Report on corporate operational anomalies and/or illicit acts and/or frauds and/or abuses for which, following preliminary checks, a significant qualitative-quantitative impact on the balance sheet of Softeam Spa can be estimated (in terms of accounting issues, legal audit of accounts, internal controls on financial information). The impact is "significant" qualitatively if operational anomalies and/or frauds and/or abuses are capable of influencing the economic and investment decisions of potential recipients of financial information. The significance of the impact quantitatively is assessed by Management in coordination with the Manager and the Whistleblowing Committee;

Report: the written or oral communication of information concerning Employees and/or Third Parties on violations of laws and regulations, the Code of Ethics, Organizational Model 231, as well as the system of current rules and procedures;

Reports 231: concern the predicate offenses contemplated in Legislative Decree 231/2001;

Third Parties: natural or legal persons, other than SOFTEAM S.p.A. Personnel, who have various relationships, such as employment, collaboration, or business relationships with SOFTEAM S.p.A., including - not exhaustively - clients, partners, suppliers (also in the context of subcontracting/subcontracting), self-employed workers or holders of collaboration relationships, freelancers, consultants, agents and intermediaries, volunteers, and interns (paid or unpaid), or anyone who is a legitimate stakeholder in the company's business activities.

13. Attached 1

SANCTIONS

Article 21 of Legislative Decree no. 24/2023 dated March 10, 2023, provides for the application of pecuniary administrative sanctions by ANAC against subjects in the public and private sectors who commit violations of the obligations established in the same Decree. The following table outlines the applicable pecuniary administrative sanctions against individuals identified as responsible for the violations.

| VIOATION | RESPONSIBILE | SANCTIONS |
|--|-------------------|---------------------------|
| Retaliation | Physical person | from € 10.000 to € 50.000 |
| Obstruction of reporting (or attempted) | Physical person | from € 10.000 to € 50.000 |
| Violation of the obligation of confidentiality | | from € 10.000 to € 50.000 |
| Failure to establish reporting channels | Guidance body | from € 10.000 to € 50.000 |
| Failure to adopt procedures for the submission and management of reports, or adoption not in accordance with what is provided by the Decree | Guidance body | from € 10.000 to € 50.000 |
| Failure to carry out the verification and analysis of the received reports | Reporting manager | from € 10.000 to € 50.000 |
| Establishment, even by a first-instance judgment, of the civil liability of the reporting person for defamation or false accusation in cases of willful intent or gross negligence, unless the same has already been convicted, even at first instance, for the crimes of defamation or false accusation or in any case for the same crimes committed through the report to the judicial authorities | Physical person | from € 500 to € 2.500 |

SOFTEAM S.p.A.