

ASO Group Companies encourage and promote a culture inspired by legality, ethics and transparency.

To this end, ASO H&P and FDF have decided to establish their own IT platform to give the possibility to the members of their corporate bodies, their employees, collaborators but also to external parties, to report any irregularities of which they have become aware and which could cause injury or damage to the Companies or third parties.

All reports will be dealt with the utmost discretion and confidentiality to protect the reporting agent from any risk of being subjected to retaliatory or discriminatory actions in their working environment.

In addition, the personal data acquired will be processed in full compliance with Regulation (EU) 2016/679 and the Privacy Code.

HOW CAN YOU SEND A REPORT?

A report can be sent, in written or oral form, through the platform accessible directly at the following links: <https://aso-fdf.integrityline.com/>

The reporting agent should provide as much information as possible about the incident (including following the instructions provided by the platform), taking care to describe in detail the facts to be reported.

The reporting agent may also indicate other persons who may report the incident and attach files or supporting documents to the alert.

The complainant may also ask to be heard personally.

WHO CAN MAKE AN ALERT?

In addition to the directors and members of the corporate bodies, employees or collaborators of ASO H&P and FDF who are or have been witnesses, including indirectly, of an offence or irregularity committed by the Company or its employee. Volunteers, trainees and the self-employed also fall into this category.

Headquarter ASO H&P S.r.l.

Via Antonio Salieri, 32
37050 Vallese di Oppeano (VR) Italy
A.E.A. VR 415644
CF/PI/Reg.Imp. 03775710985
SDI code A4707H7
Cap. Soc. € 1.000.000,00 i.v
T. +39 045.4550101 - F. +39 045.4550102
PEC: asosps@legalmail.it

The report can also be sent by external parties (for example, suppliers), provided that the information has been learned within the context of their business.

It is not necessary that the legal relationship with the Company is in place at the time of reporting.

WHAT BEHAVIOUR CAN BE REPORTED?

May be reported unlawful behaviour relevant pursuant to d.lgs. 231/2001 or violations of the model of organization and management adopted respectively by ASO H&P and FDF.

FDF may also report any conduct, act or omission that damages the public interest or the integrity of the Company and that consists in violations of European legislation, such as:

- offences falling within the scope of European Union acts relating to the following areas: public procurement, services, financial products and markets and prevention of money laundering and terrorist financing, security and product conformity, transport safety, environmental protection, radiation protection and nuclear safety, food and feed safety and animal health and welfare, public health, consumer protection, protection of privacy and protection of personal data and security of networks and information systems;
- acts or omissions affecting the financial interests of the European Union;
- acts or omissions relating to the internal market (for example, infringements of competition and State aid);
- acts or conduct which undermine the object or purpose of the provisions of Union acts.

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WARNING: Complaints concerning a personal interest of the signaller and relating exclusively to their individual employment relationship cannot be reported.

WHAT HAPPENS AFTER A REPORT?

All reports are received by the *Whistleblowing Officer*, who will send an acknowledgement of receipt within 7 days.

As a preliminary step, an analysis will be carried out to assess the validity of the report and the relevance of the report to the violations that can be reported.

The *Whistleblowing Officer* could subsequently contact the signaller through the IT platform, in order to request integrations or acquire additional information. Once the report has been prepared and the necessary investigations have been carried out, the reporting agent will be informed of the outcome of the report.

The *Whistleblowing Officer* may also decide to file the report in case of manifest groundlessness or irrelevance with respect to the scope of application.

HOW IS THE CONFIDENTIALITY OF THE COMPLAINANT PROTECTED?

All data related to the alert (identity of the parties involved and content of the alert) are protected by security measures and standards (e.g. encryption tools and other methods of protection against unauthorized access).

The identity of the alerter is known only by the person responsible for managing the alert, who guarantees absolute respect for the confidentiality of the alerter and the other persons mentioned.

At the time of sending the report, the platform will automatically assign to the signaller a unique identification code and a password that must be used by the signaller to perform subsequent accesses to the platform.

It is recommended to keep this code carefully as it cannot be duplicated or recovered in case of loss.

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Can the report be sent anonymously?

At the reporting stage, the reporting agent may decide not to disclose his or her identity. However, reporting agents are encouraged to prefer the disclosure of their identity, ensuring absolute respect for the confidentiality of the reporting agent and the application of the safeguards provided by Legislative Decree no. 24/2023, that otherwise could not be implemented against an unknown subject.

This also implies greater effectiveness in the investigations that will be conducted later by the *Whistleblowing* Officer, who will be able to instruct anonymous reports only if the content of the same is clear, precise, complete and therefore suitable to bring out specific facts and situations.

IMPROPER USE OF THE CHANNEL (PERSONAL CLAIMS, CLEARLY UNFOUNDED OR DEFAMATORY REPORTS)

Complaints concerning an interest of a personal nature of the signaller and relating exclusively to their individual employment relationship cannot be reported.

Furthermore, the channels cannot be used to make reports with a clear defamatory and opportunistic character.

WHAT HAPPENS IF THE REPORT IS CLEARLY UNFOUNDED AND DEFAMATORY?

Both ASO H&P and FDF do not tolerate an incorrect use of the signal channels set up, or a use of these channels to make reports with obvious defamatory and opportunistic character. If the alert identifies these elements or, in any event, reveals that the reporting agent was motivated by the intention to damage or wrongly blame other parties, the Companies reserve the right to take disciplinary and/or legal action against such whistleblowers.

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In addition, in the event that it is established that the reporting agent is responsible for the incorrect use of the channels (e.g. by judgment of first instance), the safeguards provided by Legislative Decree 24/2023 will not be guaranteed.

WHEN TO MAKE AN EXTERNAL ALERT?

An external alert is an alert addressed to ANAC A signaller may make an alert to ANAC when:

- has not been established, in its business context, a reporting channel or if activated this does not comply with the provisions of d.lgs. 24/2023;
- the alert has already issued an internal alert, but this has not been followed up;
- the reporting person has reasonable grounds to believe that, if he made an internal alert, it would not be effectively followed up or that this could lead to a risk of retaliation;
- the reporting person has reasonable grounds to believe that the breach may constitute an imminent and manifest danger to the public interest.

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