WHISTLEBLOWING PROCEDURE

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1 PURPOSE OF THE PROCEDURE

AMA Composites S.r.l. (hereinafter "AMA Composites") with this procedure intends to define the correct management of the Reports (feedback, verification and analysis), issued by the subjects referred to in art. 3, paragraphs 3 and 4, of Legislative Decree 24/2023, also anonymously, relating to alleged irregularities, offences and/or omissive conduct that harm the public interest or the integrity of the Company and which are become known by reason of the employment relationship, i.e. because of or on the occasion of the same, as described below. The existence of a channel for the management of Reports, in addition to complying with specific regulations, contributes to strengthening the principles of legality, transparency and responsibility, as well as AMA Composites's Internal Control and Risk Management System.

2 REGULATORY FRAMEWORK

The main regulatory provisions on the so-called "S.p.A. Whistleblowing applicable to AMA Composites are contained in Legislative Decree no. 24 of 10 March 2023, of ""Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the Protection of Persons Reporting Breaches of Union Law and on the Provisions Concerning the Protection of Persons Reporting Breaches of National Law Provisions". Legislative Decree no. 24/2023 applies to all legal persons who have employed, in the last year, an average of at least fifty employees with permanent or fixed-term employment contracts, or who, although not reaching the average of employees indicated by the legislation, (i) fall within the scope of the European Union acts identified in the Annex to Legislative Decree 24/2023 (so-called sensitive sectors) or (ii) have adopted an Organization, Management and Control Model. The current regulatory provisions allow the reporting of violations of European Union law as well as relevant offences pursuant to Legislative Decree no. 231/2001 and contribute to creating a reporting system to protect the reporting person, the public interest as well as the integrity of the legal person itself.
The current Article 6, paragraph 2-bis, of Legislative Decree no. 231/2001 establishes that: "The forms referred to in letter a) of paragraph 1 provide pursuant to the legislative decree implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, the internal reporting channels, the prohibition of retaliation and the disciplinary system, adopted pursuant to paragraph 2, letter e)". In this regard, art. Article 4, paragraph 1, of Legislative Decree no. 24/2023, provides that: *"The entities of the private sector, after consulting the representatives or trade unions referred to in Article 51 of Legislative Decree no. 81 of 2015, shall activate, pursuant to this article, their own reporting channels, which guarantee, also through the use of encryption tools, the confidentiality of the identity of the reporting person, of the person involved and of the person in any case mentioned in the report, as well as the content of the report and the related documentation. The Organizational, Management and Control models, referred to in Article 6, paragraph 1, letter a) of Legislative Decree no. 231 of 2001, provide for the internal reporting channels referred to in this decree"*.

3 DEFINITIONS

ANAC: National Anti-Corruption Authority (in Italy)

Company: means AMA Composites S.r.l.

Code of Ethics: adopted pursuant to Legislative Decree no. 231/01, it is a document where the Company sets out the set of rights, duties and responsibilities of the Company itself with respect to all the subjects with whom it enters into relations for the achievement of its corporate purpose. The Code of Ethics aims to establish ethical "standards" of reference and rules of conduct that the Recipients of the Code must comply with in their relations with the Company for the purpose of preventing and suppressing unlawful conduct.

Legislative Decree 196/03: Legislative Decree no. 196 of 30 June 2003 – Code on the protection of personal data.

Legislative Decree 231/01 or Decree: Legislative Decree no. 231 of 8 June 2001 relating to the "Regulation of the administrative liability of legal people, companies and associations, including those without legal personality" and subsequent amendments and additions.

Reporting: Written or oral communication of information about possible violations

Internal reporting: means the written or oral communication of information on violations, submitted through the Company's internal reporting channel which guarantees the confidentiality of the identity of the whistleblower, the person involved and the person in any case mentioned in the report, as well as the content of the report and related documentation

Violations: means behaviors, acts or omissions that harm the public interest or the integrity of the

Whistleblower: means the person linked to the activity of AMA Composites who makes the Referral as AMA Composites employees; self-employed workers, collaborators, freelancers and consultants; employees or collaborators of suppliers, contractors or sub-contractors; customers; volunteers and trainees; shareholders and persons with administrative, management control, supervisory or representation functions

Facilitator: means the natural person who assists the Whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential;

Person involved: means the natural or legal person mentioned in the Report as the person to whom the Violation is attributed or as a person otherwise involved in the reported Violation;

Employment context: means the work or professional activities, present or past, carried out in the context of the legal relationship between the Whistleblower and the Company, through which, regardless of the nature of such activities, a person acquires information on violations and in the context of which he or she could risk retaliation in the event of a Report;

Persons in Charge of the Management of Whistleblowing Reports of AMA: means the Internal Audit Function of AMA S.p.A., parent company of AMA Composites S.r.l., provided for by Articles 6, paragraph 1, letter b) and 7 of Legislative Decree 231/2001, responsible for receiving Reports and carrying out the activities of verification and management of the reported facts, as better specified in this Procedure.

4 SUBJECT AND CONTENT OF THE REPORT

The Reports must relate to Violations of which the Whistleblower has become aware in the context of work and which consist of:

1) Unlawful conduct relevant pursuant to and for the purposes of Legislative Decree 231/2001;
2) violations of the Code of Ethics and the Organization, Management and Control Model;
3) offences that fall within the scope of the European Union or national acts indicated in the Annex to Legislative Decree 24/2023 or the national acts that implement the European Union acts indicated in the Annex to Directive (EU) 2019/1937, although not indicated in the Annex to Legislative Decree 24/2023, relating to the following sectors: public contracts; financial services, products and markets and the 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 protection of personal data and security of network and information systems;
4) acts or omissions affecting the financial interests of the Union referred to in art. 325 of the Treaty on the Functioning of the European Union specified in the relevant secondary legislation of the European Union;
5) acts or omissions concerning the internal market referred to in art. 26(2) of the Treaty on the Functioning of the European Union, including infringements of the European Union's competition and State aid rules, as well as infringements concerning the internal market related to acts that infringe corporate tax rules or mechanisms the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax rules;
6) acts or conduct which frustrate the object or purpose of the provisions referred to in the acts of the Union referred to in points 3, 4 and 5.

The following behaviors must not be the subject of Reports:

- ✓ disputes, claims or requests related to a personal interest of the Whistleblower that concern exclusively individual employment relationships;
- ✓ reports of violations where already compulsorily regulated by European Union or national acts indicated in Part II of the Annex to Legislative Decree 24/2023 or by national acts that constitute implementation of the European Union acts indicated in Part II of the Annex to Directive (EU) 2019/1937, even if not indicated in Part II of the Annex to Legislative Decree 24/2023; the Decree, in fact, does not apply to reports of violations governed by the directives and regulations of the European Union and in the implementing provisions of the Italian legal system which already guarantee specific reporting procedures;
- ✓ reports of breaches of national security, as well as procurement of defense or national security aspects, unless such aspects fall under the relevant secondary legislation of the European Union.

For the Manager of the Report to have sufficient information to proceed with the necessary checks and verifications on the reported facts, the Reports must be sufficiently clear and circumstantial; based on precise and consistent evidence; concern facts that can be verified and known directly by the Whistleblower; allow adequate verification of the validity of the Report.

Reports may not relate to suspicions or rumors, nor requests, claims or instances of a personal nature. The Report must be made in good faith and must not contain slanderous and/or defamatory information; the latter, in fact, may give rise to civil and/or criminal liability against Whistleblower and the application of disciplinary sanctions.

It is permitted to make anonymous Reports, i.e. those that do not allow the identification of the Whistleblower, when they are adequately substantiated and in any case, such as to bring out facts and situations referable to specific contexts (e.g. indications of names or qualifications, mention of specific offices, procedures or particular events, etc.).

5 REPORTING METHODS

AMA Composites has set up internal reporting channels suitable for guaranteeing the confidentiality of the identity of the Whistleblower and the correct management of the related Reports (even if anonymous). Reports must be made using the Reports Management Portal accessible at the following link: https://areariservata.mygovernance.it/#!/WB/ama.

Alternatively, it is possible to make a Report through the following channels:
- using the ordinary mailbox: AMA S.p.A., c.a. Persons in charge of the Management of Reports, via Puccini, 28 - 42018 San Martino in Rio - Reggio Emilia - Italy;
- by calling the following telephone number +39 0522 6369 (Mon-Fri | 9-17);

Through the methods indicated above, it is possible to request the scheduling of a meeting with the Persons in Charge of the Management of Reports.
If the Report is submitted to a person other than the Persons in Charge of Management the Reports, the receiving party must transmit, within seven days of its receipt, the Report to the Persons in Charge of Handling the Report, who will notify the Whistleblower of the transmission.
If the Report is made orally, through a telephone call or a meeting with the Persons in Charge of Handling Reports, subject to the consent of the Whistleblower, the same is documented by means of a report. The Whistleblower may verify, rectify and confirm the transcribed report by signing it.

6 TASKS AND RESPONSABILITIES

The Persons in Charge of the Management of Whistleblowing Reports have an adequate level of authority, independence and autonomy and are responsible for applying, updating and amending this procedure.

The Persons in Charge of the Management of Whistleblowing Reports are responsible for receiving and managing the Reports covered by this Procedure. They also have access to all information and documents relating to the Reports received.

The Persons in Charge of the Management of Whistleblowing Reports are responsible for verifying the validity and management of the Report and shall act, in compliance with the principles of impartiality, fairness, transparency and confidentiality, by carrying out any activity deemed appropriate, including interviewing the Whistleblower and any other parties who may report on the facts subject to the Report.

The Persons in Charge of the Management of Whistleblowing Reports, within seven days from the date of receipt of the report and where it is possible to trace the sender, will issue the Whistleblower with an acknowledgement of receipt through the same channels of receipt of the Report.

The Persons in Charge of the Management of Whistleblowing Reports may contact, if not anonymously, the Whistleblower to request further useful elements to carry out the verification activity. If no further elements are provided or elements deemed insufficient are provided, the Report will be archived.

The Persons in Charge of the Management of Whistleblowing Reports may avail themselves of the support of the competent corporate functions or structures from time to time and, where deemed appropriate, of external consultants, if their involvement is functional to the verification of the Report. Only if necessary for the conduct of the investigations, the identity of the Whistleblower may be revealed to third parties involved in the investigations once the consent of the Whistleblower has been obtained (pursuant to Article 12, paragraph 2, Legislative Decree 24/2023). In this case, the same duties of conduct are incumbent on the people involved aimed at ensuring the confidentiality of the Whistleblower.

Based on the information provided, the Persons in Charge of the Management of Whistleblowing Reports evaluate:

✓ whether to proceed with the filing of the Report due to manifest unfoundedness, the absence of factual elements suitable for justifying investigations, or the ascertained generic content of the Report such as not to allow the facts to be understood, or because the Report is accompanied by inappropriate or ineffective documentation;

✓ whether to start an audit or fraud investigation activity;

✓ whether it is necessary to involve the Judicial Authority;

✓ whether it is necessary to involve administrative bodies or independent authorities vested with supervisory and control functions.

At the end of the verification phase, the Persons in Charge of the Management of Whistleblowing Reports prepare a summary report of the investigations carried out and the evidence that emerged, sharing it, based on the results, with the relevant company departments.

If there are doubts about the validity of the Report, the Persons in Charge of the Management of Whistleblowing Reports must contact the internal bodies in charge and/or the competent external bodies, so that they can take any measures within their respective competence.

It is the responsibility of the Persons in Charge of the Management of Whistleblowing Reports to ensure the traceability of Reports and related investigative activities; the preservation of the related documentation in archives that ensure the appropriate levels of security/confidentiality. The Reports and the related documentation must be kept for a period of time not exceeding that necessary for the purposes for which the data were collected or subsequently processed and in any case in compliance with the Procedure and procedures for the protection of personal data in force in the Company and in any case no longer than five years from the date of communication of the final outcome of the Reporting procedure. Similarly, the functions involved in the activities of verifying the validity of the Report ensure, as far as they are competent, the traceability of data and information and provide for the storage and archive of the documentation produced, paper and/or electronic, so as to allow the reconstruction of the different phases of the process itself.

The Persons in Charge of the Management of Whistleblowing Reports ensure an annual summary flow of the reports received and managed, in compliance with the confidentiality provisions of Legislative Decree 24/2023: to the Board of Directors; to the Board of Statutory Auditors; to the Risk Management Committee and to the company in charge of the statutory audit of the accounts.

7 CONFIDENTIALITY

AMA Composites ensures that the documentation relating to each Report received (i.e. all information and supporting documents from which the identity of the Whistleblower or other persons mentioned in the Report can be inferred) is kept, in compliance with confidentiality requirements, for the time necessary to carry out the management activities of the Reports received and, in any case, no later than five years from the date of communication of the final outcome of the Reporting procedure.

Therefore, without prejudice to the rights of the Whistleblower pursuant to Regulation (EU) 2016/679 and Legislative Decree 24/2023, the documentation relating to the Report cannot be viewed or copied by any third parties. The identity of the Whistleblower and any other information from which this identity may be inferred, directly or indirectly, may not be revealed, without the express consent of the

Whistleblower himself, to persons other than those competent to receive or follow up on Reports expressly authorized to process such data pursuant to art. 29 and 32, par. 4, of Regulation (EU) 2016/679 and art. 2-quaterdecies of the Code regarding the protection of personal data pursuant to Legislative Decree no. 196/2013, and in accordance with the company procedures on the protection of personal data.
The identity of the Whistleblower and any other information that may reveal the identity of the Whistleblower may only be revealed:
- if it is necessary for the purposes of carrying out investigations into the Report and in any case with the express consent of the Whistleblower;
- in the context of disciplinary proceedings if the complaint is based in whole or in part on the Report and knowledge of the identity of the Whistleblower is essential for the defense of the accused and in any case only with the express consent of the Whistleblower;
- in the event that in internal and external reporting procedures, the disclosure of the identity of the Whistleblower is also essential for the purpose of defending the person involved and, in any case, only with the express consent of the Whistleblower.
However, even in the cases reported above, the Persons in Charge of the Management of Whistleblowing Reports notify the Whistleblower in writing of the reasons for the need to disclose his or her identity. The Whistleblower must provide his/her express consent. It is understood that the Company also guarantees the confidentiality of the following information:
- the identity of the Person involved;
- the identity and activity in which the facilitator's assistance takes place);
- the identity of the persons other than the person reported, but in any case, involved in the report, in compliance with the same guarantees provided for the Whistleblower.

8 PROHIBITION OF RETALIATION AND/OR DISCRIMINATORY MEASURES

AMA Composites prohibits acts of retaliation and/or discrimination, direct or indirect, against the Whistleblower, for reasons linked, directly or indirectly, to the Report. Acts of retaliation and/or discrimination are defined as any behavior, whether active or omissive, attempted or threatened, which is consequent to the Report and which causes or may cause, directly or indirectly, damage to the Whistleblower.

The performance of retaliatory or discriminatory acts against the Whistleblower is a source of disciplinary liability, without prejudice to any further form of liability provided for by law. Protections against acts of retaliation and/or discrimination also apply during the selection process or in pre-contractual phases, during the probationary period or after the termination of the employment relationship, when information on violations has been acquired during these periods.

The protection system is extended to facilitators; to persons belonging to the same work context as the Whistleblower; to persons who are linked to the Whistleblower by a stable emotional or kinship bond within the 4th degree; to the work colleagues of the Whistleblower, who work in the same work context and with whom they have a habitual relationship; to entities owned by the Whistleblower or for which the Whistleblower works, as well as to entities operating in the same working context as the Whistleblower.

It is confirmed that any form of retaliation and/or discrimination concerning the working conditions of those who collaborate in the activities of verifying the validity of the Report is prohibited.

The person who believes he or she has suffered retaliation for making a Report must inform ANAC

exclusively by making a Report in accordance with the provisions of the following Procedure and Legislative Decree 24/2023.

To enjoy the protection, it is necessary that: the Whistleblower reasonably believes that the information relating to the reported Violations is true, but simple assumptions or rumors as well as news in the public domain are not sufficient; the Whistleblower reasonably believes that the information contained in the Report is relevant as it falls within the Violations and there is a close connection between the Report and the retaliatory act suffered.

If there is an ascertainment with a sentence against the Whistleblower, even at first instance, of criminal liability for the crimes of slander or defamation or for the same crimes related to the complaint, or of civil liability, for having communicated false information intentionally with intent or negligence, a disciplinary sanction is imposed on the Whistleblower.

9 EXTERNAL REPORTING

It is possible to make an external report, i.e. a report transmitted using the IT platform prepared by ANAC and available at the following email address: https://www.anticorruzione.it/-/whistleblowing. Access to this channel is allowed only under certain conditions.

The Reporter may make a report if at the time of its submission:

a) the internal channel is not active or does not comply with the provisions of the Decree with regard to the subjects and methods of submitting internal Reports which must guarantee the confidentiality of the identity of the Whistleblower and other protected subjects;

b) the Whistleblower has already made an internal Report that has not been followed up;

c) the Whistleblower has reasonable grounds to believe, on the basis of the concrete circumstances attached and information that can actually be acquired and, therefore, not on mere inferences, that, if he made an internal Report, it would not have followed up due to the circumstances of the specific case or could lead to the risk of retaliation;

d) the Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest. The External Reporting may relate to the Violations referred to in paragraph 4.1 of this procedure numbers 3) to 6).

The External Report is considered inadmissible and is filed directly by ANAC for the following reasons: a) manifestly unfounded due to the absence of factual elements attributable to the violations typified in art. 2, paragraph 1, letter a) of Legislative Decree 24/2023; b) manifest non-existence of the legal prerequisites for the exercise of ANAC's supervisory powers, including the absence of the prerequisites for reporting with particular reference to persons who carry out their work for private sector entities; c) manifest lack of competence of ANAC on the issues reported; d) ascertained generic content of the report of offence such as not to allow the understanding of the facts, or report of offences accompanied by inappropriate or ineffective documentation such as not to make the content of the report itself understood; e) production of only documentation in the absence of the report of illegal conduct; f) lack of data that constitute essential elements of the report of offences indicated by the Regulation for the management of reports and for the exercise of the sanctioning power; g) existence of minor violations.

10 RECIPIENTS OF THE PROCEDURE

This Procedure is available on the company intranet, posted on the bulletin boards and sent to all AMA Composites employees with an email address.

It is also available on the company website.

The Persons in Charge of the Management of Whistlblowing Reports identify the most appropriate initiatives to ensure maximum dissemination of this Procedure and the correct implementation of its contents.

11 INFORMATION PURSUANT TO ARTICLES 14 AND 15 OF THE GDPR 2016/679

AMA Composites S.r.l., owner of the processing of personal data pursuant to GDPR 2016/679, informs that the personal data acquired through this report will be processed exclusively for purposes related to compliance with the obligations deriving from Legislative Decree 231/2001, as well as used, and subsequently stored, mainly in paper form.

Having recognized the legitimacy of even "anonymous" reports, the provision of data appears optional and a refusal in this sense will not entail any consequence on the validity of the work of the person called upon to manage the report by AMA Composites S.r.l. The whistleblower remains, in any case, personally responsible for any defamatory content of his/her communications and AMA Composites S.r.l., through the Persons in Charge of the Management of Whistleblowing Reports, reserves the right not to take into consideration the reports produced in evident "bad faith".

AMA Composites S.r.l. also reminds that the data to be provided must be relevant to the purposes of the report, so that the Persons in Charge of the Management of Whistleblowing Reports will be free not to follow up on reports concerning conduct or subjects unrelated to the obligations deriving from Legislative Decree 231/2001. Except for the fulfilment of obligations deriving from the law, the personal data provided will not have any scope for communication and dissemination.

Pursuant to art. 6 of the GDPR 2016/679, the Whistleblower may exercise the following rights:

- Obtain information on the origin of your data as well as the purposes and methods of processing, the logic applied in the case of processing carried out with the aid of electronic tools, the identification details of the data controller and data processors as well as the subjects or categories of subjects to whom the personal data may be communicated.

- Obtain the updating, correction or, when interested, integration of the data; the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; the certification of the transactions that have been brought to the attention of third parties, also with regard to their content; of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right.

- Object, in whole or in part, for legitimate reasons, to the processing of personal data concerning him/her, even if pertinent to the purpose of the collection;

To exercise the rights, the Whistleblower may contact the Data Protection Officer designated by the Data Controller directly via e-mail address info@amacomposites.it, by ordinary mail at the Company's registered office, located in Via Repubblica, 7 41011 Campogalliano (MO).

12 ENTRY INTO FORCE

This procedure was approved by the Board of Directors of AMA Composites S.r.l. on 22 November 2024.