

The background image shows two men in a meeting room. They are looking at a wall covered with various papers, documents, and sticky notes. The man on the right is wearing glasses and is pointing at a document on the wall. The man on the left is looking at the same document. The overall scene is dimly lit with a blue and purple color scheme. A network diagram overlay is visible in the top left corner.

Whistleblowing Policy

March 2022

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POLICY OVERVIEW

1) Summary of Whistleblowing Policy

What?

The Whistleblowing Policy of STEFANINI is a way for employees, suppliers or customers to report misconduct or actions that violate applicable laws and/or the Code of Ethics/Code of Conduct (“Misconduct”):

- Financial and accounting irregularities
- Bribery and corruption
- Antitrust practices
- Health and safety concerns regarding its premises or employees
- Environmental concerns regarding its premises or products
- Discrimination and harassment

For individuals based in the European Union:

infringements of Union law under Directive (EU) 2019/1937 of 23 October 2019 on the protection of individuals who report infringements of Union law (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L1937>) ('Whistleblowers Directive')

- Infringements of local law transposing the Whistleblower Directive in a given EU Member State where STEFANINI is established.

This Policy describes how to confidentially report serious and sensitive issues of illegal or unethical misconduct and how the report will be handled.

For whom?

Both employees and third parties can report (suspicions of) abuse or an irregularity of STEFANINI via the Whistleblowing Policy. Employees are encouraged to discuss (suspicions of) abuse or an irregularity with their supervisor first, if possible. In cases where that is not desirable for any reason, you can make use of this scheme.



2) Purpose

When someone violates a law or internal policy, he or she puts STEFANINI, and possibly employees or other persons, at risk. The sooner such wrongdoing is stopped, the better it is for all concerned. Therefore, STEFANINI has implemented a whistleblowing policy (the "Whistleblowing Policy") with the following objectives:

- ✓ ensure that employees and managers of STEFANINI, as well as other stakeholders such as suppliers, agents, representatives, distributors or customers, as an alternative to the existing internal communication route - have the possibility to report serious and sensitive matters regarding breaches of, for example, the STEFANINI Code of Ethics/Code of Conduct or any applicable legislation, and
- ✓ act as an early warning system by ensuring that the top management of STEFANINI is informed of such matters at the earliest possible stage, so that it is able (i) to assess and investigate the matter and (ii) if necessary, to take appropriate and sufficient measures to limit the consequences of a possible breach, danger or other serious risk.

For the avoidance of doubt, reporting under the Whistleblower Policy shall be on a voluntary basis and the Whistleblower Policy shall not replace existing internal communication routes within STEFANINI.

What is the Policy not for?

The Whistleblower Policy is only intended for reporting (suspected) abuse or irregularities.

The Whistleblower Policy is not intended for:

- Ordinary complaints relating to STEFANINI. For this you can use the complaints procedure or send an email to integrity_emea@stefanini.com
- Abuses or complaints about customers or suppliers of STEFANINI.
- For handling or reporting personal grievances of employees.

3. Complaint's procedure

How can I as an external party report a Misconduct (abuse or irregularity) about STEFANINI?

Via the Whistleblower Report form on the website (www.stefanini.com), by e-mail to integrity_emea@stefanini.com or by letter to the Integrity Officer addressed to the following address:

Fountain Plaza, Belgicastraat 5
1930 Zaventem
Belgium
+32 2 620 20 20



4. Rules for whistleblowing

Any report of Misconduct must be made in good faith and based on reasonable grounds. If the Misconduct is not confirmed by the investigation, no further action shall be taken by STEFANINI. A Whistleblower shall not become involved in the investigation of the Misconduct nor shall the Whistleblower determine any action to be taken. This task shall be assigned to competent persons within STEFANINI.

However, if a report contains false, unfounded or opportunistic allegations, or is made solely to discredit or harm others, STEFANINI may take appropriate disciplinary and/or legal action against the Whistleblower.

No form of retaliation, threat, punishment or discrimination against the Whistleblower or any person who has cooperated with the investigation shall be accepted. STEFANINI shall take appropriate action against any person who retaliates or threatens to retaliate against Whistleblowers who have acted in accordance with this Policy.

Reporting channels

If you discover, become aware of or have reasonable grounds to suspect that (possible) Misconduct is taking place in the context of the business activities of STEFANINI, we encourage you to inform STEFANINI immediately.

Before reporting Misconduct under the provisions of this Policy, we ask our staff, directors, management, agents and representatives to first consider the normal reporting channels (i.e. your direct manager or supervisor, the manager of your department, a director or your HR manager).

Reports can be made anonymously.

STEFANINI recommends that the name of the Whistleblower is mentioned in the report. This will allow the investigation team to carry out its investigation more effectively and to take appropriate measures for the protection of the Whistleblower.

Depending on the type of Misconduct reported, it may be required by law to involve the public authorities in order to launch an official investigation. In such cases, STEFANINI may be obliged to disclose the name of the Whistleblower to the public authorities, whereby the strict confidentiality of the Whistleblower shall be guaranteed at all times.

Each report, even if anonymous, should be detailed and well-documented and should include the following information (when known) so that the investigation team can check the validity of the reported incidents:

- A detailed description of the events and how the Whistleblower came to know about them;
- the date and place of the event;
- the names and functions of the persons involved or information by which they can be identified;
- the names of any other persons who may corroborate the facts reported;
- any other information or element that might assist the investigation team in checking the facts.



5. Reporting Channel:

To raise Misconduct under the Whistleblowing Policy, the Whistleblower can do so through the Integrity Officer:

To the attention of the Integrity Officer
Fountain Plaza, Belgicastraat 5
1930 Zaventem
Belgium
+32 2 620 20 20

In addition, internal and external whistleblowers may at any time and in any language report Misconduct directly and confidentially to the Integrity Officer via email integrity_emea@stefanini.com

The Integrity Officer will take note of the receipt of the reported matter. The Integrity Officer will confirm receipt of the whistleblower report within seven days. In general, you will receive feedback on your report within three months of the acknowledgement. However, if specific circumstances of the case so require, this time limit may be extended to six months.

If the case concerns the Integrity Officer, he/she shall be excluded from participating in the handling of the case and the decision-making process and the case shall be referred to the Legal & Compliance Department. If a matter concerns a member of management or the Board of Directors, the Board of Directors of STEFANINI respectively the shareholders' meeting will be informed.

If you do not feel safe using the reporting system of STEFANINI and you are based in the European Union (EU), you may report an issue through external reporting channels organized in the relevant EU Member State. However, you are encouraged to use the internal reporting channel of STEFANINI.

6. Confidentiality

STEFANINI shall not disclose the identity of the Whistleblower unless:

- the Whistleblower consents to the disclosure; or
- publication is required by law.

Unauthorized disclosure of information about the investigations, the report or the identity of the Whistleblower or the person under investigation will not be accepted and will result in disciplinary action, and possibly dismissal of the person concerned. Depending on the circumstances, such conduct may also give rise to other sanctions, including civil or criminal prosecution.

7. Data processing

Only personal data that are strictly necessary for processing and verifying the validity of the report will be processed, and for the sole purpose of following the procedures set out



in this Policy by STEFANINI as a controller.

STEFANINI hereby declares that all personal data of Whistleblowers and any other persons concerned (including any special categories of personal data ("sensitive data"), which are obtained when handling Whistleblower Reports, will be processed in strict compliance with the provisions of the applicable legislation on the protection of personal data, and with the Data Protection Policy.

For the purpose of this Policy in particular, you will find below information regarding the relevant Processors of STEFANINI and the relevant personal data that will be processed, as well as the purpose and legal basis for the processing.

- Personal data are processed by STEFANINI and other entities of the STEFANINI group that may be required to be involved in carrying out the research for the purposes of this Policy (hereinafter "STEFANINI", "we", "us", "our").
- You can contact us regarding your personal data via e-mail: (privacy@stefanini.com)
- Where we refer to certain laws or regulations, such reference shall include any amendment, replacement or annulment of the said laws and regulations, including any related implementing regulations.
- We may deem it necessary to amend, modify or change this Data Protection Statement. We may do so from time to time at our sole discretion. You can always refer to the latest version of this Policy.
- If you have any questions or complaints about the way we process your personal data, you can always contact us by sending an email to (privacy@stefanini.com). You also have the right to lodge a complaint with the competent data protection authority.
- The information on reports shall be kept in secured systems of STEFANINI for the statutory retention periods stated below and in any case for the limitation period of civil or criminal proceedings, should these arise from the report.
- The number of individuals involved in any investigation will be limited to the extent consistent with a full and complete investigation. The Employee, Vendor or the investigating individuals may be located in the United States, Europe, or in a country which is not recognized by the European Commission as providing an adequate level of protection of personal data. Transfers of personal data will be secured by appropriate and suitable safeguards in accordance with applicable law, including via Standard Contractual Clauses as permitted pursuant to the General Data Protection Regulations effective 25 May 2018 ("GDPR"). A copy of these appropriate safeguards may be requested by contacting privacy@stefanini.com.

Types of personal data processed

1. When you submit a Whistleblower report, we process standard identity data to the extent that you provide it to us (i.e. your name, company, job title, address and phone number); your complaints; persons listed in the complaint, persons involved



- in processing of the facts reported and any other personal data you provide to us;
2. When you are part of a Whistleblower investigation, we process: your standard identity information (i.e. your name, company, job title, address and phone number); any other information necessary to handle the complaint and investigate the allegations;
 3. The original complaint;
 4. Information collected in connection with the investigation of the complaint;
 5. The investigation report; and
 6. The result of an investigation report.

Purposes and legal basis for the processing of personal data

1. The purposes of the personal data processing, including any data transfers within STEFANINI are:
 - a. supporting honesty, integrity and ethics throughout STEFANINI;
 - b. enabling reporting via the corporate concern reporting system;
 - c. handling complaints and processing reports made through the corporate concern reporting system;
 - d. determining whether an investigation is needed and conducting/managing the investigation;
 - e. analyzing the results of investigations of reported matters;
 - f. determining corrective actions to take pursuant to a report and/or related investigation; and taking the relevant actions.
2. We process personal data to handle Whistleblower complaints and investigate the allegations. The processing of your personal data is necessary for the protection of our legitimate interests to secure our business and operations and to properly handle Whistleblower complaints. Such legitimate interests include the protection of STEFANINI or third parties against financial, reputational, and regulatory harm and legal risks as well as the protection of the health, safety and well-being of the employees and third parties.
3. We may process personal data to comply with legal obligations or to respond to a reasonable request from competent police services, judicial authorities, or government agencies, including competent data protection authorities. The processing of your personal data is necessary for a legal obligation to which we are subject.
4. We may disclose personal data to the police or judicial authorities as evidence if there are reasonable grounds to suspect that an illegal act or crime has been committed by you in the context of the Whistleblowing procedure. The processing of your personal data is necessary for a legal obligation to which we must adhere.
5. In addition, the processing of specific categories of personal data will only be processed as necessary for the establishment, exercise or defense of legal claims or as otherwise permitted under applicable data protection law. Suspicions of criminal offences will only be processed as necessary for the management of STEFANINI's own litigation or as otherwise authorized by applicable law.
6. In certain circumstances, STEFANINI may also process certain personal data



collected through the reporting system as necessary to comply with legal obligations to which STEFANINI is subject.

7. Automated decision-making, including profiling, does not take place in connection with the use of the corporate concern reporting system. The collected personal data will not be used for direct marketing purposes.

8. Technical and organizational measures

STEFANINI and its Vendor shall use appropriate technical and organizational security measures to ensure the protection of the information collected in the context of this Policy, which is in compliance with the Privacy Policy and with applicable data protection regulations as described in Section “Data Processing” of this Policy.

Record retention periods and deletion of data

Your report shall be registered in a confidential manner and kept only as long as necessary and proportionate to enable STEFANINI to fulfil its legal obligations.

Unless otherwise required by local law, the information collected will be deleted:

- A. immediately if the report falls outside the scope of the Whistleblower Policy or proves to be unfounded, or if no internal action is taken in relation to the matter,
- B. immediately after the authorities have closed the case if it has been reported to the police or other competent authorities,
- C. two months after the investigation has been completed if no further action is taken, or
- D. no later than seven years after the end of the employment of the employee, if disciplinary measures have been taken against the reported employee on the basis of the information collected, or if there are other reasons why it is legally and factually necessary to keep the information, the information collected will be kept in the personnel folder in question.

Data Subjects Rights

In certain jurisdictions, such as the European Union and European Economic Area, an individual (the Data Subject) whose data is being processed as described in this Policy, has a number of rights which are broadly summarized in this Section. Please note that exercising these rights is subject to additional requirements and conditions as set forth in applicable data protection law. In summary the employee or the third party filing a notification or complaint (“Data Subject”) has a right to:

- ✓ Obtain confirmation from STEFANINI as to whether the Data Subject’s personal data is processed, request access to that personal data the purposes of the processing and the recipients or categories of recipients.
- ✓ Allow the Data Subject to obtain from STEFANINI the correction of inaccurate or incomplete personal data concerning the Data Subject.
- ✓ Allow the Data Subject to obtain from STEFANINI the erasure of personal data concerning the Data Subject.
- ✓ Allow the Data Subject to request that STEFANINI restrict the processing of the Data Subject’s personal data.



- ✓ Allow the Data Subject, to receive personal data concerning the Data Subject, which the Data Subject has provided to STEFANINI, in a structured, commonly used and machine-readable format.
- ✓ Allow the Data Subject to make an objection to the processing of the Data Subject's personal data by STEFANINI.

If a Data Subject wishes to exercise these rights and obtain the information relating to the Data Subject, the Data Subject may contact STEFANINI's data protection officer can be contacted at privacy@stefanini.com.

Individuals subject to European Union personal data protection regulations who wish to lodge complaints regarding the data processing described here in, may do so with the competent data protection supervisory authority, in particular in the Member State of their habitual residence, place of work or of an alleged infringement of the data regulations.

For more information about data processing and rights of the individual in general, reference is made to STEFANINI's Privacy Statement: <https://stefanini.com/en/stefanini/policies/privacy-policy>

9. Handling of a notification or complaint

- Step 1: Report. The Integrity receives a report about potential Misconduct.
- Step 2: Investigation. The Integrity Officer will promptly and diligently investigate all reports in accordance with this Policy. The Integrity Officer will check the validity of the report and, together with relevant internal departments, conduct a thorough investigation respecting the principles of confidentiality, impartiality, and fairness towards all involved. The Integrity Officer and the relevant department(s) may decide to involve other functions, when necessary, in the context of the investigation.
- Step 3: Report the Integrity Officer will draft an overview report describing the investigations conducted. This overview report may, only, when necessary, be shared with other internal functions to make a decision.
- Step 4: Decision. The Integrity Officer will prepare a final report with a description of the facts and the final decision:
 - If the Misconduct is proven, appropriate measures shall be prescribed to end the Misconduct and protect the Company; or
 - If the conclusion of the investigations is that there is insufficient or no evidence of Misconduct, no further action will be taken.
- Step 5: Information the Integrity Officer shall inform the Whistleblower about the final conclusion of the report and the decision taken.

10. Implementation and compliance

The Whistleblower Policy has been adopted by the management of STEFANINI. The management of STEFANINI is responsible for the implementation of the



Whistleblowing Policy and informing all their employees about it. STEFANINI will ensure compliance with relevant local data protection rules and the Privacy Statement, including:

- (a) application of the principles of data quality and proportionality;
- (b) providing clear and comprehensive information on these arrangements and policies;
- (c) the rights of potential accused persons;
- (d) the security of processing;
- (e) the management of internal whistleblower reports;
- (f) issues related to international data transfers, and
- (g) notification and prior checking.

11. Update of this Policy.

This Policy will be updated in case of any change in the law and in any case once a year.

