

# HYDRG Holding Spa

Via Provinciale Nord, 26/a - 40050 Castello d'Argile (BO)  
Tel.051976635 - Fax 051976572 - www.hydro-holding.com  
VAT ID No., Tax Code and registration No. in the Business Register of  
Bologna (BO): 02937551204 REA Number: BO-479046 - Capital Stock:

HYDRG HOLDING SPA	GUIDELINES FOR FOREIGN SUBSIDIARIES - WHISTLEBLOWING REPORTS
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### 1. DEFINITIONS

**Good faith:** a genuine belief that a potential breach of the Group Code of Ethics exists or that misconduct has been engaged in. Reports submitted in good faith shall be complete and accurate.

**Group Code of Ethics:** adopted by the Parent company and by each individual legal entity controlled by the same, this document establishes the principles i.e. the core values that reflect Hydro Group's commitment to business and personal integrity.

**Hydro Group:** the Group of companies consisting of Hydro Holding S.p.A. and its subsidiaries.

**Retaliation:** any adverse action taken against a person for reporting a problem or misconduct in good faith or cooperating with an investigation. Such actions include threats, intimidation, exclusion from *team* events, harassment, discrimination, restriction of career opportunities, redeployment, negative feedback on performance regardless of actual performance failures, or dismissal.

**Whistleblower:** the person submitting the Report, whether employee (including the top management), collaborator, member of corporate bodies, third party (partner, customer, supplier, consultant, etc.). and, in general, anyone in business relations with Hydro Group.

**Report:** the written or oral communication of information about breaches.

**Follow-up:** the action taken by the person in charge of the reporting channel management, to assess the existence of the reported facts, the outcome of the investigation and any measures taken.

**Reported subjects:** any person whom the Whistleblower attributes wrongdoings/irregularities as indicated in the report.

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**Third Parties:** contractual parties of Hydro Group, both natural persons and legal entities with whom/which the Company enters into any form of contractually regulated cooperation and intended to cooperate with the Company. [by way of example but not limited to the following: collaborators, suppliers; consultants (such as consulting firms, lawyers); other third parties who have contractual relationships with Hydro Group (e.g., outsourcing companies, staffing companies, and contracted employees)].

**Stakeholders:** all legitimate stakeholders in the company's business.

## 2. INTRODUCTION

These guidelines (hereinafter referred to as the "**Guidelines**") govern the process for receiving, analysing and processing *whistleblowing* reports within the scope of Hydro Holding S.p.A.'s (hereinafter the "**Parent Company**") foreign subsidiaries

The Guidelines are also intended to regulate how to ascertain the validity and substantiation of reports and, consequently, to take appropriate corrective and disciplinary actions to protect the individual *legal entities*, the Parent Company, as well as Hydro Holding Group as a whole.

In addition, the Guidelines aim to:

- ensure personal data privacy, both for the Whistleblower and the person allegedly responsible for the breach, without prejudice to the rules governing investigations or proceedings initiated by the judicial authorities in relation to the reported facts, or in any case disciplinary proceedings in the event of reports submitted in bad faith;
- suitably protect the Whistleblower against direct or indirect retaliatory and/or discriminatory conduct for reasons directly or indirectly connected with the report;
- provide a specific, independent, autonomous and accessible channel for reporting purposes.

In addition, all cases received via the available channels shall be tracked until their final and full completion.

## 3. SCOPE OF APPLICATION

The Guidelines were approved by the Board of Directors of the Parent Company, and their adoption and implementation is therefore mandatory for all its subsidiaries, there including all related companies and affiliates, if any.

They apply to all employees, including executives and members of the Board of Directors, as well as to *business partners* of the Parent Company and its subsidiaries (i.e., suppliers, consultants, customers and, in general, any other third parties who have contractual relationships with Hydro Group), wherever they reside.

Each company of Hydro Group required to adopt these Guidelines shall have the faculty to adopt rules differing from or in addition to those set forth herein, also if so required by applicable local legislation.

In any event, the principles and rules provided for by applicable legislation, there including privacy regulations protecting the identity of the Whistleblower and the prohibition of retaliatory or discriminatory acts - whether direct or indirect - against the Whistleblower for reasons directly or indirectly related to the report made, shall be understood as mandatory.

These Guidelines come into effect for Hydro Group companies on the date of approval by the Parent Company's Board of Directors.

These Guidelines are intended as a reference for all Hydro Group companies.

Where local laws provide for more stringent regulatory requirements on this subject, a Local Policy in line with the principles contained in these Guidelines shall be prepared.

#### **4. RESPONSIBILITY**

All reports received shall be forwarded, based on the place of origin:

- to the staff functions responsible for their processing, who shall be expressly authorised and specially trained for this purpose;
- to the parent company's Supervisory Board.

Only those staff functions authorised for this purpose shall conduct investigations related to the reports received.

#### **5. SCOPE AND CONTENT OF THE REPORT**

All behaviours or practices that do not comply with the provisions of the Group's Code of Ethics, laws, rules and regulations, as well as with the internal procedural structure in force within Hydro Group shall be subject to reporting.

The report may also be received in anonymous form.

However, all reports shall be substantiated and based on precise and concordant elements, relate to verifiable facts, and contain all the elements necessary to carry out the investigations and verifications required to assess their merits.

Therefore, it is important that the Whistleblower:

- report, clearly, completely and circumstantially, where and when the reported events occurred;
- indicate generalities or other elements that would make it possible to identify the perpetrator of the reported facts;
- indicate any other individuals who may report on the reported facts;
- indicate/provide any documents that may confirm the validity of the report;
- provide any other information or evidence that may constitute useful feedback about the existence of the reported facts.

#### **6. REPORTING CHANNELS AND CASE MANAGEMENT**

Reports should be submitted through the *Whistlelink* reporting channel, that can be accessed from Hydro Holding's website and directly from the browser by entering the following address: <https://hydroholding.whistlelink.com/>.

The application allows reports to be submitted with the following methods:

- In writing, by filling out the relevant form, or by sending a text message;
- Orally, by recording a voice message. This form of reporting shall not contain voice morphing. It is recommended, therefore, that this method be used only in those cases where the Whistleblower does not request to remain anonymous (the privacy of the Whistleblower shall be however preserved).

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The Whistleblower may also enter a request for a face-to-face meeting into the application, which will be scheduled within a reasonable time from the date of receipt of the request.

The App ensures - through the use of encryption tools - the identity privacy of the Whistleblower, the persons reported, and of the person mentioned in the report, as well as confidentiality of the report content and the related documentation. All reports received are encrypted with ISO 27001-certified standards featuring the highest security, and data are stored on secure servers outside the corporate network.

The APP also allows the Whistleblower to remain anonymous (subject to the provisions above with reference to oral reports).

Once the report entry process is completed, the APP assigns an identification number to the report. By accessing the "Follow My Case" section, entering the report number and the *password* generated when entering the report, it is possible to monitor the report handling progress, or to communicate directly with the report manager in the event of requests for further investigation or direct meeting.

The Whistleblower shall be informed that the Report submitted by him/her has been accepted for processing.

In addition, information regarding the progress of the investigation and its final outcome shall be communicated to the Whistleblower.

### **7. RETALIATION AND DATA PRIVACY**

All reports received shall be treated confidentially.

Reporting is safe and Hydro Group shall always protect the Whistleblower from any kind of retaliation if reported in good faith.

Anyone who retaliates against a person who submits a report in good faith shall be subject to disciplinary action.

Compliance of the reporting channel with applicable Data Privacy laws is also assured; In addition, the personal data of the persons involved and/or mentioned in the reports made under this Policy shall be processed, insofar as compatible, in accordance with applicable legislation and the company's procedures on the protection of personal data.

### **8. CASE EVALUATION AND RESOLUTION**

Reports shall be investigated at the regional level by trained and experienced caseworkers to assure the greatest confidentiality.

### **9. DATA RETENTION**

All data processed in accordance with this Policy shall be retained for the time period deemed strictly necessary to meet the Policy purposes, in accordance with applicable local legislation.