

Title: Whistleblowing Global Policy	
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1 PURPOSE

Angelini Pharma recognizes the importance of having a transparent process that gives all Recipients working in the organization the opportunity to report actions and behaviors that are not in line with the law, its Code of Ethics and company policies and procedures.

The purpose of this policy (hereinafter referred to as the "Policy"), more precisely, is to share a process through which to report possible irregularities or violations observed in the organization in an anonymous and confidential way, allowing the company to carry out the appropriate investigations in compliance with current regulations and to take corrective actions if necessary.

2 SCOPE

This Policy applies to all Angelini Pharma's companies and is addressed, more specifically, to all employees, members of corporate bodies, collaborators, consultants, agents or third party, more generally, to all those who, for whatever reason, work for Angelini Pharma's companies.

It applies both in the workplace and outside the workplace, if the contexts in question are in any way related to the company's business (for example but not limited to i.e., when negotiating with a client/supplier or organizing trips/events with clients or third parties connected with the work context).

This is without prejudice to any legal obligations, in particular with regard to the obligation to report to the Judicial Authorities or to the Supervisory Authorities, provided for by the local legislation of the countries in which the Companies operate.

3 REPORTING PROCESS

3.1 WHAT IS PART OF THE REPORTING PROCESS

All situations in which behavior violates the law or, in any case, represents practices that do not comply with the provisions of the codes and regulations adopted at corporate level or that are in contrast with corporate values may be reported, where there is knowledge of such behavior.

Reports do not concern matters of a private nature or complaints of a personal nature against colleagues or superiors, for which reference should be made to the Human Resources Department which will handle them in accordance with internal procedures and regulations on employment relations.

The Report can also be received anonymously and is always handled confidentially. In order to allow for further investigation of the events reported, the Reports must be circumstantial and based on precise and concordant elements, relate to verifiable facts and contain a series of elements, such as

- where and when the reported events occurred;
- personal details or other elements that make it possible to identify the person who committed the act reported and any other persons who may report on the facts in question;
- any documents that may confirm the validity of the Report.

3.2 REPORTING FLOW

A Recipient who encounters suspicious behavior may report

- To the line Manager
- To the Global Legal function
- To the Global Compliance function
- To the Global HR function
- To the DPO
- To the Supervisory Body at the email address odvacraf@angelini.it or through paper mail addressed to “Organismo di Vigilanza di Angelini Pharma, Viale Amelia n.70-00181 Roma”
- On the internet platform specially designed and available on the intranet or company web site at the following address: <https://report.speeki.com>¹ (hereafter “Platform”) that guarantees the confidentiality of the Whistleblower.

Where possible, an acknowledgment of receipt should be provided to the Whistleblower within seven days and the eligibility should be verified within fifteen days.

In the case of eligible Reports, an investigation phase will begin in collaboration with other relevant company functions or third parties by sharing only the content necessary for the purposes of the investigation in such a way as to guarantee the protection of the confidentiality of the identity of the Whistleblower.

Where aspects relating to the protection of personal data are involved in the Report, the Global DPO must be called upon to participate in a purely consultative capacity.

In any case, where the Report is relevant in terms of Organizational Model and Code of Ethics, the Global Compliance function must forward it to the Supervisory Body which will assess whether further investigations pursuant to Legislative Decree No. 231/2001 are required.

The appointed structures carry out - possibly within three months from the receipt date of the Report - all the necessary verifications and send to Global Compliance and/or the Supervisory Body a report on the investigative activities carried out and the outcome of the checks carried out, on the basis of which they proceed with:

- the archiving of the Report due to the objective absence of unlawful conduct and/or irregularities or due to the absence of evident and/or reasonable grounds for further investigation;
- the initiation of an internal investigation.

If the Report is *proven* to be true, the Company shall take the appropriate measures and necessary actions to protect the Company.

Global Compliance, where possible, provides feedback to the Whistleblower and ensures:

- traceability of the Reports and the related preliminary activities;
- preservation of the documentation relating to the Reports and the relative verification activities;
- preservation of the Reports and the documentation relating to them 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 Policy and procedures for the protection of personal data in force at the Company;

¹ Company code to be used in the platform: ANGELINI.

- communication of the Reports to the Supervisory Body, where, following the in-depth investigations carried out, they prove to be relevant in terms of the Organizational Model and Legislative Decree no. 231/01.

Global Compliance will also report to the Global Compliance Committee.

4 CONFIDENTIALITY AND PROHIBITION OF RETALIATION AND/OR DISCRIMINATORY MEASURES

In order to guarantee the confidentiality of the Whistleblower and to avoid the risk of retaliation and/or discrimination against the person making the Report, Angelini Pharma Companies undertake to:

- take charge of Reports having the characteristics described in this Policy and to manage them in compliance with it, even if they are Reports made in a non-nominative form;
- take appropriate action through the relevant functions in the event of bad faith reports and, more generally, violations of this Policy.
- not allow or tolerate any direct or indirect retaliation or discrimination against the whistleblower that affects working conditions for reasons directly or indirectly related to the report;
- consider the violation of the confidentiality obligations provided for in this Policy or the performance of retaliatory or discriminatory acts against the Whistleblower as a source of liability, including of a disciplinary nature.

The processing of the personal data of the persons involved and/or referred to in the Reports made pursuant to this Policy shall take place, insofar as compatible, in accordance with the legislation in force and the company's procedures for the protection of personal data, according to the methods indicated in the privacy policy on the processing of personal data made available to the data subjects.

5 REFERENCE STANDARDS

The sources on the subject of *whistleblowing* applicable are mainly contained:

- in Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law;
- in Regulation (EU) No. 2016/679 ("GDPR");
- in Law No. 179 of 30 November 2017, which came into force on December 29, 2017, setting forth "*Provisions for the protection of whistleblowers of crimes or irregularities of which they have become aware in the context of a public or private employment relationship*";
- in articles 4-undecies and 4-duodecies of the Consolidated Finance Act;
- in EU Regulation 596/2014 on market abuse;
- in art. 48 of Leg. Decree 231/2007, setting out provisions for the implementation of the so-called Fourth AML Directive.

6 PUBLISHING

This Policy is published on the company Intranet and communicated to all Recipients at the time of the establishment of the relative contractual relationship.

Recipients may contact Global Compliance, Global HR or Global Legal with any questions or concerns regarding the application of the Policy.

7 DEFINITIONS

Term	Definition
Angelini Pharma	Angelini Pharma S.p.A. and all companies directly or indirectly controlled by it, pursuant to art. 2359, paragraph 1, no. 1 and 2 of the Italian Civil Code.
Code of Ethics	Angelini Pharma Code of Ethics.
Company	Angelini Pharma and all Angelini Pharma companies individually considered.
Global Compliance Committee	Shall mean the internal body consisting of the following functions (i) CEO (ii) Global Legal; (iii) Global HR, (iv) Global Finance, (v) Global Medical, (vi) Global Regulatory, (vii) Global Quality.
Organizational Model	The organizational, management and control model adopted by the Companies pursuant to Legislative Decree. 231/2001.
Recipients	All the recipients of this procedure, i.e., those persons who work for Angelini Pharma companies, including employees, members of corporate bodies, collaborators, consultants, commercial agents, interns, self-employed workers or other third parties.
Report(s)	This means any information, even if anonymous, concerning violations or suspected/presumed violations of relevant criminal law. With reference to this last point, the following should be noted by way of example but not limited to: <ul style="list-style-type: none"> • Code of Ethics and related procedures and policies; • Data protection and data governance system procedures.
Supervisory Body (OdV)	This means the body appointed by the Board of Directors of the Group companies pursuant to Legislative Decree no. 231 of 2001.
Whistleblower	This means the person making the Report, whether an employee (including <i>top management</i>), collaborator, member of the corporate bodies or other Recipient of this Procedure.

8 DOCUMENT HISTORY

Date of entry into force	Version	Description and reason for change
April 8 th 2019	1.0	New document (Angelini Holding)
Refer to first page	2.0	General revision for new responsibilities and channels in the Angelini Pharma Group, in line with Directive (EU) 2019/1937