



WHISTLEBLOWING

BizAway is committed to regulating the protection of persons who report violations they have become aware of in a work context, in accordance with Legislative Decree No. 24 of 10 March 2023 for Italy and Ley 2 de 20 febrero 2023 for Spain.

To this end, our Whistleblowing channel allows you to report behaviour, acts or omissions that violate national or European Union regulations (Directive n.2019/1937) and harm the public interest or the integrity of the organisation (e.g. administrative, accounting, civil or criminal offences; unlawful conduct relevant under Legislative Decree No. 231 of 8 June 2001 or violation of the organisational and management models provided for therein; offences contrary to European Union law on consumer protection).

Reports are handled, in accordance with the obligation of confidentiality and the provisions on the processing of personal data, by a team of three people/bodies: a human resources representative, our data protection officer and the Supervisory Body. The persons entrusted with the management of the reporting channel are characterised by their independence from the organisation.

The person making the report is protected, in accordance with the prohibition of retaliation, from any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report, the complaint to the judicial or accounting authorities or public disclosure, which causes or may cause the person making the report or the person who made the complaint, directly or indirectly, unjust damage.

Misuse of the whistleblowing channel may result in disciplinary sanctions if the whistleblower is an employee, or other types of sanctions where provided for by applicable law.

The use of the reporting channel in good faith does not lead to any disciplinary sanctions, even if the reported facts subsequently prove to be inaccurate or are not followed up.

Reports, related documentation, personal data and information acquired are stored by the Company, as Data Controller, for the time necessary to process the report, protecting the identity of the whistleblower in accordance with the procedures set out in Legislative Decree No. 10 of 10 March 2023, no. 24, for the purpose of fulfilling the legal obligation arising from the aforementioned decree, in compliance with the principles set out in Articles 5 and 25 of Regulation (EU) 2016/679, and in any case for no longer than five years from the date of notification of the final outcome of the reporting procedure.

INSTRUCTIONS FOR INTERNAL REPORTING

Reports can be sent to:

bizaway.integrity.complylog.com

The whistleblower may also request a face-to-face meeting to make the report through the channels indicated above.

The meeting will be arranged within a reasonable time frame with a Whistleblowing Contact Person.

REFERENCES FOR EXTERNAL REPORTING

With regard to external reporting channels, please note that these can be used under the conditions set out in Article 6 of Legislative Decree No. 24 of 10 March 2023, or Article 4 of Ley 2 of 20 February 2023, by



submitting an external report directly to the competent authorities at . The reporting person may make an external report if one of the following conditions applies:

- a) the mandatory activation of the internal reporting channel is not provided for in their working environment, or this channel, even if mandatory, is not active or, even if activated, does not comply with the provisions of Article 4;
- b) the reporting person has already made an internal report in accordance with Article 4 and no action has been taken;
- c) the reporting person has reasonable grounds to believe that, if they were to make an internal report, it would not be effectively followed up or that the report itself could lead to the risk of retaliation;
- d) the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

If at least one of the above conditions is met, it will be possible to make external reports to the National Anti-Corruption Authority (ANAC) using the procedures set out on the institutional website www.anticorruzione.it.

For further information on the possibility of public disclosure and reporting to the judicial authorities, please see <https://www.anticorruzione.it/-/whistleblowing>.