



ALERT MANAGEMENT PROCEDURE

METANOLO MEDITERRANEO S.R.L.

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1. Introduction

Metanolo Mediterraneo S.r.l. (hereinafter also "the Company") has adopted an internal communication channel through which to submit reports of actual or suspected breaches without fear of retaliation and with the utmost respect for the protections provided to the whistleblower.

The Company adopts a Management and Control Organisation Model pursuant to Legislative Decree 231/01 (MOGC), therefore the internal reporting channel is provided within the Model. This procedure is to be understood as an annex to Model 231.

2. Regulations

- ⇒ directive 1937/2019
- ⇒ regulation 679/2016 or GDPR
- ⇒ Legislative Decree no. 24/2023: implemented in Italy the European Directive no. 1937/2019 on whistleblowing, repealing the provisions on the subject provided for by Law no. 179/2017 for the public sector and by Legislative Decree no. 231/2001 for the private sector;
- ⇒ Legislative Decree 231/01 of 2001 laying down rules on the administrative liability of legal persons;
- ⇒ ANAC Guidelines on the protection of persons reporting breaches of Union law and protection of persons reporting breaches of national regulatory provisions, adopted by Resolution No. 311 of 12 July 2023;
- ⇒ ANAC guidelines on whistleblowing on internal reporting channels, approved by Resolution no. 478 of 26 November 2025.

3. Purpose and scope

The purpose of this procedure is to:

- ✓ **Promote** a corporate culture based on transparency, accountability and integrity;
- ✓ **Establish and make known the** internal reporting channel;
- ✓ **Define responsibilities for the reporting process;**
- ✓ **Explain the protections provided to the whistleblower or protection system in accordance with the regulations;**
- ✓ **Illustrate the sanctioning system**, envisaged by the legislation against the Company and the whistleblower.

The procedure applies to **Metanolo Mediterraneo S.r.l.**

4. Definitions

WHISTLEBLOWER: a natural person who makes a report on breaches learnt of within their work context

BREACHES: conduct, acts or omissions that harm the public interest or the integrity of the public administration or private body

WORK CONTEXT: the work or professional activities, present or past, conducted within the Company, through which, regardless of the nature of such activities, a person acquires Information on Breaches and within which they could risk retaliation in the event of a report.

REPORTING: communication by the whistleblower concerning information on one or more breaches

INTERNAL REPORTING: communication, written or verbal, of information on breaches, submitted through the internal reporting channel adopted by the Company

EXTERNAL REPORTING: communication, written or verbal, of information on breaches, presented through the external reporting channel managed by ANAC

PUBLIC DISCLOSURE: making breaches public through printed or electronic means in order to reach a large audience (including the use of social networks)

REPORT TO THE JURISDICTIONAL AUTHORITY: possibility of contacting the competent national judicial and accounting authorities to report unlawful conduct that has been learnt of in the public or private work context

RETALIATION: any behaviour, act or omission, even if only attempted or threatened, performed by reason of the report that causes or may cause the reporting person or the person who filed the report, directly or indirectly, unfair damage

ANAC: National Anti-Corruption Authority (<https://www.anticorruzione.it>)

FACILITATOR: "natural person who assists the whistleblower in the reporting process, operating within the same working context and whose assistance must be kept confidential".

OO.SS: Company Trade Union Representatives (RSA)/Unitary Trade Union Representation (RSU); in the absence, the corresponding Territorial Organisations of the most representative Trade Unions at national level.

5. Reporting characteristics

5.1 Subjective assumptions: who can report?

Metanolo Mediterraneo S.r.l., in compliance with the legislation, identifies as potential whistleblowers:

INTERNAL STAKEHOLDERS:	EXTERNAL STAKEHOLDERS:
- All employees, regardless of the contractual framework and the function covered; - Persons with administrative, management, control, supervisory or representative functions, including de facto.	- Self-employed workers and collaborators, who provide goods or services or who perform work in favour of the Company; - Volunteers and trainees, paid and unpaid, who perform their activities in the work context of the Company; - Freelancers and consultants who work for the Company.
OTHER PARTIES TO WHOM THE WHISTLEBLOWER'S PROTECTIONS ARE EXTENDED	
- Facilitators - Persons from the same working context with kinship up to the fourth degree and stable emotional bond - Co-workers with a regular and current relationship (for example friendship bond) in the same work context	

- Entities owned by the whistleblower or for which the whistleblower works or which operate in the same work context (the rationale in this case is to protect such entities from, for example, commercial retaliation)

The report can be made by a subject who is in the selection or pre-contractual phase, during the trial period and after dissolution of the relationship.

This procedure applies to cases where the whistleblower discloses their identity. The rationale is to ensure these individuals enjoy the protections required by law, guaranteeing confidentiality of the personal data provided.

5.2 Anonymous reports

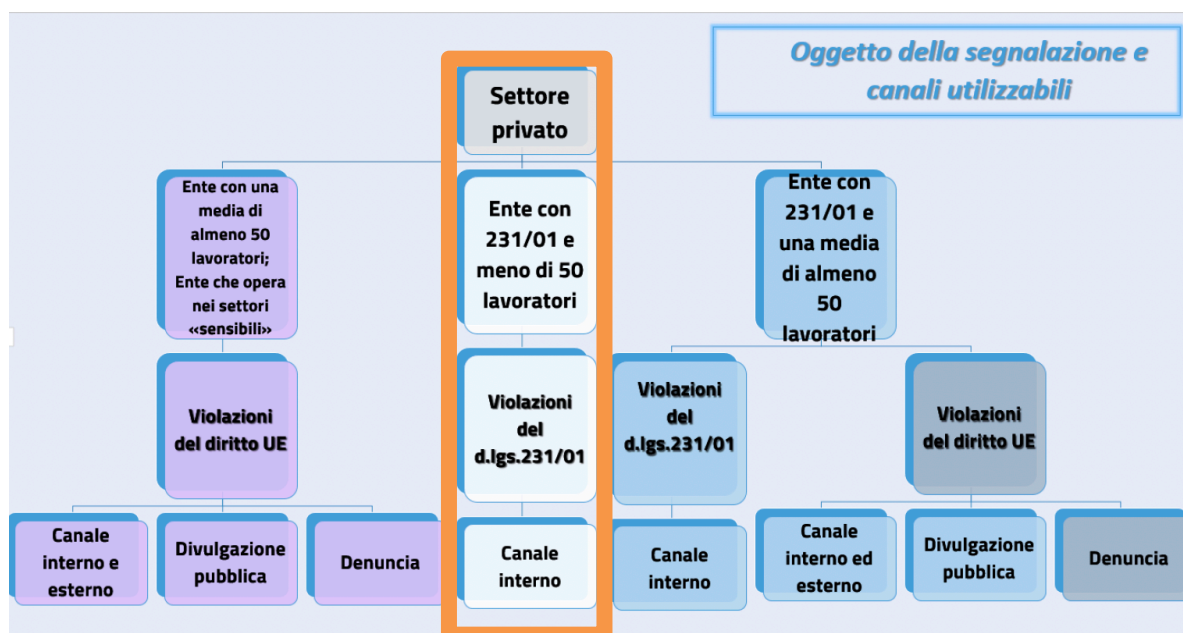
Anonymous reports are to be considered "ordinary" reports, even if conveyed through the internal channel. The protections against the anonymous whistleblower, subsequently identified as having reported retaliation to ANAC, apply.

In the case of anonymous reporting, the content is decisive for its admissibility or "acceptance"; therefore, only detailed reports accompanied by evidence will be taken into due consideration.

The Company has adopted a system for recording and storing of the relevant documentation. This system is integrated into the Teseo platform adopted by the Company.

5.3 Objective assumptions: what can be reported?

The decree differentiates the subject of the report in relation to the characteristics of the legal entities involved. The following table briefly represents what can be reported and with which channels:



Source: ANAC Guidelines Scheme

In general, the report may concern all relevant conduct pursuant to Legislative Decree 231/01 or that imply a breach, presumed or ascertained, of Model 231 or of the Code of Ethics, to which are added the offences of EU matrix and relevance and that therefore damage the financial interests of the European Union.

By way of example and not limited to, the report may concern:

- ⇒ ***Bribery, active and passive;***
- ⇒ ***Behaviours aimed at hindering the control activities of the Supervisory Authorities (e.g. failure to deliver documentation, presentation of false or misleading information);***
- ⇒ ***Promise or giving of money, goods or services or other benefit aimed at bribing suppliers or customers;***
- ⇒ ***Conduct of tax, accounting and financial offences;***
- ⇒ ***Tax fraud;***
- ⇒ ***Human rights violations;***
- ⇒ ***Environmental and worker health and safety offences;***
- ⇒ ***Illegal use of personal data or clear breaches of the privacy policy;***
- ⇒ ***Competition and state aid breaches;***
- ⇒ ***Breaches of the Code of Ethics and of the rules contained in the Management and Control Organisation Model.***

To protect the dignity and health of workers, as well as the moral integrity and values of the Company, employees are given the opportunity to report cases of harassment, abuse in the workplace and/or discrimination based on gender, ethnicity, religious belief or sexual orientation.

5.4 How a report should be made

The reports should preferably include the following elements:

- ⇒ ***A full description of the reported events;***
- ⇒ ***If known, the circumstances of the time and place at which the breaches were committed or presumed to have been;***
- ⇒ ***The details or elements (qualification, office, activity performed) of the person reported in order to allow their identification;***
- ⇒ ***Indications of any witnesses or subjects who may report on the facts subject to reporting;***
- ⇒ ***Any annexes or documents that may confirm substantiation of the reported facts;***
- ⇒ ***Any other information that can provide useful feedback about the existence of the facts.***

The following are subject to reports and are therefore admissible:

- ⇒ ***Communications of retaliation that the whistleblower believes they have suffered as a result of a report.***

The alleged retaliation, also potentially subject to reporting, must be communicated exclusively to ANAC. Instead, the following are excluded and therefore **INADMISSIBLE**:

- ⇒ ***Reports related to a personal interest of the whistleblower's person, which exclusively concern their individual work relationships with colleagues or with hierarchically superior figures;***
- ⇒ ***Reports based on mere suspicions or rumours;***
- ⇒ ***Reports of national security breaches.***

6. Reporting methods and channels

6.1 Reporting channels

It should be noted that the decree potentially provides for more than one method:

Internal channel	ANAC external channel	Public disclosure	Complaint
Channel set up by the Company	The whistleblower may resort to ANAC when: - the internal reporting channel is not active or does not comply with the legal requirements (e.g. when it does not guarantee confidentiality); - they have already made an internal report without receiving feedback; - they fear that the report may determine the risk of retaliation; - they fear that the breach may constitute an imminent or obvious danger to the public interest.	The whistleblower may resort to public disclosure by press or media and social media when: - they have already made an internal report and/or to ANAC without receiving feedback; - they fear that the report may determine the risk of retaliation; - they consider that the breach may constitute an imminent or obvious danger to the public interest.	The decree ultimately also recognises the right of the whistleblower to report illegal conduct that can be configured as crimes directly to the national authorities.

6.2 The internal reporting channel: the Teseo web platform

The Company, having consulted with and informed in advance the Territorial Organisations of the most representative Trade Unions at national level, has established a dedicated internal reporting channel that the whistleblower can use.

The platform uses the TESEO web-based solution, which offers a personalised portal guaranteeing compliance with all the necessary legal requirements, including those envisaged for the organisation and management of personal data processing and of the obligations provided for by privacy legislation (Legislative Decree no. 196/2003 – Personal Data Protection Code; EU Regulation 2016/679 on the protection of personal data).

The platform allows all internal and external stakeholders to send reports to predetermined internal parties authorised to manage the report in order to ensure effective and confidential communication.

The platform is accessed from the institutional website <https://metmed.it/> or at the following link metmed.wb.teseoerm.com

Before making the report, the whistleblower is asked to read a privacy policy relating to the processing of their personal data.

The TESEO web-based platform allows the whistleblower to make the report in writing or, alternatively, in verbal form as described below.

6.2.1 Written form

The written form allows the whistleblower to choose whether to make a report by providing their personal information or in a fully anonymous manner, entering only the subject of the report and the reference topic.

The platform adopted by the Company, to facilitate the reporting party, identifies predefined categories of infringement to be selected.

Finally, the platform requires the whistleblower to describe in detail the facts that are the subject of the report.

6.2.2 Verbal form

As an alternative to the written form, the Whistleblower is given the opportunity to make the report verbally. In detail, it is possible to proceed as follows:

- face-to-face meeting to be held within a reasonable period of time at a place inside/outside the Company's headquarters, guaranteeing the confidentiality of the whistleblower and of the report.

Finally, in the event of a direct meeting, the Outsourcing Team may, with the consent of the reporting person, record the meeting through devices suitable for storage and listening or, alternatively, it may draw up a report that must also be signed by the reporting person.

It is understood that, where the report is transcribed, the content of the report can always be verified and corrected by the reporting person at the time of signing.

6.2.3 Report status monitoring

Regardless of the mode chosen, at the end of insertion of the report, the platform assigns a **unique identification code (ticket code)** that the whistleblower must keep and transcribe as it will allow them to check the progress of their report.

At the time of reporting, the whistleblower receives a notification of receipt or notification visible directly on the platform.

For further operational details relating to use of the platform, please refer to "**Operating instructions for use of the Whistleblowing Web platform**".

7. How to manage the report

7.1 Subjects to be entrusted with the management of reports

As required by the ANAC Guidelines, management of the internal reporting channel referred to in the previous paragraph may be entrusted:

- a. to a person within the administration/institution
- b. to an office of the administration/institution with specially dedicated personnel
- c. to an external party

However, even if an organisation decides to outsource the operation of its reporting channels to an external provider, it remains responsible for following up on the report, for addressing the identified offence and for

providing feedback to the whistleblower. Therefore, it is always necessary for the organisation to appoint at least one internal contact person.

7.2 Who receives the report

Metanolo Mediterraneo S.r.l., making use of the faculty referred to in point c) above, has outsourced the receipt and processing of reports to Resolve Consulting S.r.l., as it considers that this body presents sufficient guarantees in terms of specialist knowledge, reliability and resources, to implement technical and organisational measures that guarantee respect for confidentiality, data protection and secrecy.

Within it, Resolve Consulting S.r.l. identifies a Team composed of resources equipped with the characteristics of professionalism necessary to ensure compliance with the provisions of Legislative Decree no. 24/2023.

Resolve Consulting S.r.l. is appointed as an "authorised data processor" in accordance with current legislation on the protection of personal data.

To follow up on what is indicated in the previous paragraph, the Company also appoints an internal whistleblowing contact person, identified in the function of the Supervisory Body. The internal whistleblowing contact person is subject to the same obligations regarding the protection of confidentiality as all the recipients of the reports.

7.2.1 Outsourcing Team Requirements

The fundamental requirement that must characterise the Outsourcing Team is autonomy, which must present the following characteristics:

- impartiality: the manager must operate in a neutral and equidistant manner with respect to the parties involved, performing an activity free from conditioning or favouritism;
- independence: the manager must be a person capable of performing the activities required for management of the report without interference, that is, in operational and evaluative autonomy
- independent performing of the competence checks and of the consequential initiatives, without delegating the final decision of the investigation to the management body.

7.2.2 Conflict of interest

In accordance with the ANAC Guidelines, independence and the absence of conflict of interest for the Outsourcing Team must always be ensured. There are cases of conflict of interest when a recipient/manager is directly or indirectly involved in the reporting. For example:

- when the Manager/receiver is the reporting subject or the reported subject;
- when the Manager/receiver is the subject mentioned in the report as a person informed of the facts.

For this purpose, the Company has appointed an Outsourcing Team with suitable characteristics to guarantee autonomy and impartiality and to prevent a potential conflict of interest.

7.2.3 Management of reports by the Outsourcing Team

In the presence of a whistleblowing report, the different phases of the Outsourcing Team's activities must, by way of example, be divided as follows:

A. Notice of receipt of the report

The Outsourcing Team is required to issue the reporting person a notice of receipt within seven days of

receipt of the report itself, as required by art. 5, para. 1, letter a) of Legislative Decree no. 24/2023.

The acknowledgement of receipt does not imply, for the Outsourcing Team, any evaluation of the content covered by the report and assumes a merely informative nature towards the reporting person with reference to the receipt and accepting of the report.

The acknowledgement of receipt, depending on the method used, will be communicated:

- through the IT platform;
- to the address indicated by the reporting person in the report.

B. Preliminary examination of the report

Preliminarily, the Outsourcing Team verifies that the report was submitted by one of the legitimate persons pursuant to Legislative Decree no. 24/2023 and that the subject of the same falls within the scope of application of the same decree (so-called subjective and objective assumptions).

In the event that the afore-mentioned requirements are missing and, therefore, the report cannot be qualified as "whistleblowing", the Outsourcing Team may transmit it to the competent subject/internal office of the entity that will treat it, where provided, as an ordinary report, simultaneously notifying the reporting person.

In any case, institutions may consider, for greater protection of the reporting person, keeping their identity confidential even if the report cannot be qualified as whistleblowing.

During the preliminary examination, the Outsourcing Team also assesses that the report:

- is based on sufficiently precise facts;
- contains a description of the facts that are the subject of the report and, where present, also the methods by which the reporting person became aware of the facts;
- contains the details of the person involved (if known) or other elements that allow identification of the person involved in the report.

Without prejudice to the possibility for the Outsourcing Team to request further clarifications, documents and information to support the report from the reporting person.

Where the required additions and clarifications have not been provided, the Outsourcing Team may archive the report, in any case providing the reporting person with the reason for the decision.

C. Investigation and assessment of the report

Once the admissibility of the report has been verified, the Outsourcing Team can proceed with the actual investigation, which consists of performing all the appropriate checks, analyses and assessments regarding the substantiation or otherwise of the reported facts.

These assessment activities can be performed, for example:

- directly, acquiring the necessary information from the reporting person;
- through the involvement of other internal structures of the institution or even of subjects;
- using external specialists, where deemed necessary, in consideration of the specifications.

using technical and professional skills relevant to the case (e.g. through hearings).

In the event that the Outsourcing Team deems it necessary to involve third parties (internal or external to the organisation) for verification of the reported facts, in order to protect the confidentiality of the whistleblower, only the results of any verifications conducted and/or anonymised extracts of the report may be transmitted.

In the event of breaches of the Code of Ethics and of the Management and Control Organisation Model, the Supervisory Body is also always involved, bound by confidentiality. Any additional parties may be involved upon prior informing and signing of a confidentiality agreement.

If it is necessary to transmit the entire documentation, including the identity of the whistleblower, to the competent judicial or accounting authorities, the Outsourcing Team shall notify the whistleblower in advance.

D. Response to the reporting person

The Outsourcing Team is required to communicate to the reporting person the results of the investigation of the report, namely:

- archiving;
- assessment of the substantiation of the reporting possibility of success on the merits;
- transmission to internal bodies or external bodies/institutions, each according to their own competences.

Legislative Decree no. 24/2023 requires that the feedback is provided to the reporting person within three months from the date of notice of receipt or, in the absence of such notice, within three months from the expiry of the seven-day period from submission of the report.

As expressly prescribed by the ANAC guidelines, the term is not to be considered peremptory, as some investigations and analyses may take longer.

However, the need to communicate the outcome of the investigation of the report remains unaffected.

E. Archiving and retention times

All documentation relating to the reports received is archived within the platform (computer archiving) and stored in compliance with current regulations on the protection of personal data.

The documentation relating to the report will be kept for a maximum of 5 years. Personal data that is manifestly useless for the processing of a specific report are not collected or, if accidentally collected, will be immediately deleted.

7.2.3 Reporting and monitoring

The Outsourcing Team prepares the Report containing the indication of the Reports received in the reference period on an annual basis.

The Report shows the "status" of each Report (e.g. received, open, in progress/closed, etc.) and any actions taken (corrective actions and disciplinary measures) in compliance with the whistleblower's confidentiality rules.

The Reporting Statement is sent to:

- Board of Directors;
- Board of Statutory Auditors;
- Supervisory Body.

In addition, in order to monitor the correct application of the current procedure, the Outsourcing Team reports at least annually to the Board of Directors.

7.3 Protection and responsibility of the whistleblower

7.3.1 Protection of confidentiality

The identity of the whistleblower and of the reported person and of the other parties involved (e.g. facilitator) are protected in any context subsequent to the report.

Breaching of the obligation of confidentiality is a source of disciplinary responsibility, without prejudice to any other form of liability provided for by law

Exceptions to the protection of confidentiality:

Express consent of the whistleblower to reveal their identity to subjects other than those previously authorised.	In criminal proceedings, the identity of the whistleblower is covered by secrecy within the limits of art. 329 of the Italian Criminal Code (only after the closure of the preliminary investigations).	In the disciplinary procedure activated against the alleged perpetrator of the reported conduct, the identity of the reporter can be revealed to the reported person to allow their defence only with the express consent of the reporter.
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In the management of the report, the personal data of the whistleblower and of other subjects possibly involved, will be processed in full compliance with the provisions of current legislation on the protection of personal data, including Reg. EU 679/2016 ("GDPR") and Legislative Decree 196/2003.

For this purpose, the Company has conducted a Data Protection Impact Assessment (DPIA).

7.3.2 Protection from retaliation

The Company, in compliance with legal obligations, has adopted a rigorous anti-retaliation policy. Retaliation including, but not limited to, the following scenarios will not be tolerated:

- ⇒ ***Dismissal, suspension or equivalent measures;***
- ⇒ ***Demotion or non-promotion;***
- ⇒ ***Change of functions, change of workplace, reduction of salary, change of working hours;***
- ⇒ ***Suspension of training or any restriction of access to it;***
- ⇒ ***Demerit notes or negative references;***
- ⇒ ***Adoption of disciplinary measures or of other sanctions, including financial penalties;***
- ⇒ ***Coercion, intimidation, harassment or ostracism;***
- ⇒ ***Discrimination or otherwise unfavourable treatment;***
- ⇒ ***Failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;***
- ⇒ ***Failure to renew or terminate a fixed-term employment contract early;***
- ⇒ ***Damage, including to the person's reputation, in particular on social media, or economic or financial prejudice, including loss of economic opportunities and loss of income;***
- ⇒ ***Listing improperly on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find employment in the sector or industry in the future;***
- ⇒ ***Early termination or cancellation of the contract for the supply of goods or services;***
- ⇒ ***Cancellation of a licence or permit;***
- ⇒ ***Request for submission to psychiatric or medical investigations.***

The Company considers the mental-physical well-being of its employees and collaborators fundamental, and undertakes to protect any person who makes a report in good faith.

7.3.3 Conditions to enjoy the protections

- ⇒ ***Whistleblowers must reasonably believe that the information about the reported breaches is true (not assumptions, rumours or public domain news);***
- ⇒ ***The good faith of the whistleblower is protected even in the event of incorrect reporting due to genuine errors (insufficient knowledge of the legal rules);***
- ⇒ ***The whistleblower must clearly indicate in the subject of the report that it is a whistleblowing report;***
- ⇒ ***There must be a close connection or consequentiality between the report and the unfavourable act directly or indirectly suffered by the reporting party, to configure retaliation.***

Without prejudice to the specific limitations envisaged, the protection of the whistleblower is not guaranteed in the following cases

- ⇒ ***The whistleblower's criminal liability for the crimes of defamation and slander was established by a first-instance ruling, as was their civil liability for the same report in cases of intent or gross negligence.***

In case of ascertainment of responsibility, a disciplinary sanction is also imposed on the reporting or whistleblowing person.

8. Sanctions and disciplinary measures

The Whistleblowing Decree provides for the imposition by ANAC of administrative sanctions for:

- those who have committed retaliation, hindered or attempted to hinder reporting or breached the obligation of confidentiality;
- those who have not performed verification and analysis of the reports;
- those for whom Liability for the crimes of defamation and slander has been ascertained, even with a first degree judgement, or where civil liability has been ascertained.

Breaches of the whistleblowing discipline constitute a source of disciplinary responsibility:

The Organisation, Management and Control Model, pursuant to Legislative Decree 231/01 adopted by the Company provides for a disciplinary system, aimed at sanctioning those who engage in the conduct covered by the report and also sanctioning those who breach the whistleblower protection measures, in accordance with the provisions of the ANAC Guidelines. If the investigation activities performed in accordance with this procedure reveal, at the expense of the Company's Personnel or Third Parties (consultants, collaborators, business partners, etc.), breaches or unlawful acts. The Company will act promptly for application of the Disciplinary System.

These sanctions also aim to ensure compliance with whistleblower protection measures and to promote a safe environment for those who decide to report breaches or unlawful conduct.

9. Training and information

The Company undertakes to disseminate to all interested parties, internal and external to the Company through appropriate information and periodic training activities.

The Company undertakes to train personnel with reference to the following topics:

- Regulatory profiles on whistleblowing, with particular attention also to the issue of the protection of personal data, to ensure the utmost confidentiality of information;
- legislation on the protection of personal data;
- the procedures and operating procedures, with specific focuses dedicated to the obligations to be implemented by the managers, including the management of conflicts of interest;
- the general principles of conduct (confidentiality and privacy, ethics and integrity, active listening, communication skills and collaboration).

The training provided involves all staff, in order to provide a clear and exhaustive picture of the new regulations, clarifying, for example, who the whistleblower is, what can be reported and with which channels, what are the protections that the law guarantees to the reporting person and which reports, instead, do not fall within those protected by the law, as well as involvement of the different subjects who operate in the same regulatory context as the reporting person.

The members of the Outsourcing Team are also trained in whistleblowing, in order to ensure the correct management of reports, compliance with current legislation and the protection of whistleblowers.

The Company provides adequate procedures that allow the Whistleblower to become aware of the whistleblowing legislation.

This procedure is published on the Company's website.

Operating instructions for use of the "Teseo" Web Whistleblowing platform

1. **Who is involved?**
2. **Who is it aimed at?**
3. **What is it for?**
4. **When should a report be made?**
5. **Who receives the report?**
6. **What cannot be reported?**
7. **What are the internal channels for reporting?**

1. **Who is involved?**

Metanolo Mediterraneo S.r.l.

2. **Who is it aimed at?**

- All employees
- Persons with administrative, management, control, supervisory or representative functions
- Self-employed workers who perform their activity at the Company
- Volunteers and trainees (paid or unpaid) who work for the Company
- Freelancers and consultants who work for the Company

3. **What is it for?**

To guarantee protection both in terms of the safeguarding of confidentiality but also from any retaliatory measures for subjects who expose themselves with reports, contributing to the emergence and prevention of risks and situations prejudicial to the Company and reflective of the collective public interest.

To provide guidelines and operational indications to the whistleblower about the subject, contents, recipients and methods of handling reports as well as about the forms of protection that are offered in line with European and local regulatory references.

4. **When should a report be made?**

When founded or alleged unlawful conduct based on precise and concordant factual elements referring to the work context are discovered. The subject of the report may be specific breaches of national and direct EU regulations and/or unlawful acts of various kinds that damage the public interest or the integrity of the Company.

Information on reportable breaches does not include news that is manifestly unfounded, information that is already totally in the public domain as well as information acquired only on the basis of rumours or poorly reliable sources (so-called water cooler gossip).

Before proceeding to make a formal report, internal consulting, where possible, with direct managers is recommended.

5. **Who receives a report?**

The Company has entrusted the management of reports to the Outsourcing Team of Resolve Consulting S.r.l. with the necessary professional characteristics to ensure compliance with the provisions of Legislative Decree no. 24/2023.

6. What cannot be reported?

Disputes, claims or requests related to a personal interest of the reporting person. Reports of breaches of national security, as well as of contracts relating to defence or national security aspects.

7. What are the internal channels for reporting?

The Company, having consulted with and informed the Territorial Trade Union Organisations in advance, **has adopted an internal IT channel - Teseo Whistleblowing platform.**

The platform allows the transmission of written reports to authorised subjects (recipients of the report).

It is also the whistleblower's right to request a direct in-person meeting (verbal report) to be arranged within a reasonable time of the request.

<u>How to make a whistleblowing report through the TESEO ERM platform</u>	
	Go to the website metmed.wb.teseoerm.com or onto the Company's website and read the privacy policy (read). Click on the link and follow the instructions you will find within the platform or on the website – whistleblowing section.
	Click on the "send a report" key, confirm the disclaimer and the information on the processing of personal data. Fill in the mandatory fields marked with (*). The whistleblower may also fill in the other non-mandatory fields that provide information about the identity of the whistleblower. In any case, remember that the report must be substantiated by indicating: - The circumstances of the time and place at which the fact that is the subject of the report occurred; - The description of the event (even in the presence of evidence or with the possibility of attaching documents); - The elements that allow identification of the subject to attribute the reported facts.
	In the event of a written report, the platform will ask you as an optional consent to reveal your identity (if provided) to persons other than those competent to receive and manage the reports. When you are sure of the content to be forwarded, click "send".
	The platform will issue the unique alphanumeric code (ticket code) that you must make a note of, keep and not disclose to third parties. It will be the only way through which you can access this report again to monitor its progress and the manager's responses, by clicking on "Reopen Ticket" on the home screen (whether you have made an anonymous report or if you have revealed your identity).
	Once the report has been made, you will receive a notification of receipt or notification, directly visible on the platform. With this notice, the deadline for notification of receipt of the report is considered fulfilled.
	Within three months (except in special cases) of the notice of receipt or notification you will receive the result of your report.
	You can send this anonymously through the platform.
	The data and information on the platform are stored within it and kept for a period of 5 years.

Reporting operating diagram



Remember

- The Company promotes throughout the process the principles of ethics, respect for integrity and protection of the whistleblower.
- The Company is committed to protecting the privacy of all persons involved.
- Reports are stored securely within the platform.
- All reports are subject to preliminary investigation. You may be contacted for further information by the Outsourcing Team assigned to managing the reports.
- The report remains confidential.