MEDISOLVE
HEALTH TECH SOLUTIONS

WHISTLEBLOWING POLICY

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1. PURPOSE

The Group promotes a corporate culture based on integrity, transparency, responsibility and respect for the law.

This Policy defines the principles and safeguards applicable to the management of whistleblowing reports within the Group companies, encouraging the reporting of behaviors, acts or omissions that may constitute violations of applicable legislation, the Code of Ethics or internal provisions.

The Policy is the common reference framework for all Group companies in the field of whistleblowing.

The procedures for receiving, assessing and managing reports are governed by **PO.SGI.10** and any organisational arrangements adopted by the individual Group companies.

2. SCOPE

This Policy applies to all Group companies and to all persons who, in the course of their employment, professional or business activities, come into contact with a Group company and become aware of conduct or circumstances potentially relevant for whistleblowing purposes.

By way of example, the recipients include:

employees;

- former employees;
- candidates;
- collaborators;
- consultants;
- self-employed workers;
- suppliers;
- business partners;
- shareholders;
- members of the corporate bodies;
- people who carry out activities under the supervision or direction of Group companies;
- any other subject protected by applicable legislation.

3. GENERAL PRINCIPLES

The Group encourages the timely reporting of behaviour, events or situations that may compromise the legality, integrity, fairness or reputation of its companies.

The management of reports is based on the following principles:

- confidentiality;
- impartiality;
- independence;
- objectivity;
- good faith;
- protection of the whistleblower;
- protection of the people involved;
- absence of retaliation;
- protection of personal data.

Reports are an essential tool for prevention, continuous improvement and strengthening of the internal control system.

4. SUBJECT OF THE REPORTS

The following may be reported: facts, behaviours, acts or omissions that the whistleblower reasonably believes may constitute:

- violations of applicable law;
- violations of the Code of Ethics;
- violations of policies, procedures and internal regulations;
- conduct contrary to the principles of integrity, fairness and transparency;
- situations that may cause damage or prejudice to the Group, its people or other interested parties.

Reports must be made in good faith and on the basis of information that the whistleblower reasonably believes to be true at the time of reporting.

5. REPORTING CHANNELS

The Group companies provide dedicated channels for receiving and managing whistleblowing reports.

These channels are designed and managed in such a way as to ensure adequate levels of:

- security;
- confidentiality;
- protection of information;
- traceability of the process.

The operating methods for using the reporting channels are governed by the specific procedures, instructions and guides adopted by the individual companies.

6. CONFIDENTIALITY

The identity of the whistleblower, the people involved and any other information acquired as part of the management of the report are treated with the utmost confidentiality and in compliance with the applicable legislation.

Access to the information is allowed only to authorized people and limited to what is necessary for the correct management of the report.

7. PROTECTION OF THE WHISTLEBLOWER AND PROTECTED PERSONS

The Group prohibits any form of retaliation, discrimination, penalization or unfavorable treatment against those who make a report in good faith or cooperate in verification activities.

No person may suffer negative consequences for having made a report that, at the time of submission, was reasonably considered to be well-founded.

The protection measures provided for by the applicable legislation extend to persons expressly protected by law, including those who assist the whistleblower in the reporting process and other persons associated to the whistleblower who may be exposed to the risk of retaliation.

8. PROTECTION OF THE PERSONS INVOLVED

The Group ensures that every report is handled in compliance with the principles of impartiality, proportionality and the presumption of innocence.

The people involved in a report have the right to the protection of their dignity, reputation, confidentiality and their rights of defense.

Reports made maliciously, in bad faith or for purely defamatory purposes are prohibited.

This is without prejudice to the adoption of any measures provided for under applicable laws and company regulations.

9. REPORT MANAGEMENT

Whistleblowing reports are managed in accordance with the provisions of the **PO.SGI.10** and any organisational arrangements adopted by the individual companies.
Verification activities are carried out independently, impartially and in compliance with the principles established by this Policy.
At the end of the checks, the appropriate corrective, preventive or disciplinary actions may be taken, in accordance with the provisions of the applicable internal provisions.

10. PROTECTION OF PERSONAL DATA

The personal data acquired as part of the reporting process is processed in compliance with Regulation (EU) 2016/679 ("GDPR"), applicable national legislation and company provisions on the protection of personal data.
The information is processed exclusively for the purposes related to the receipt, management and verification of reports, in compliance with the principles of data minimization and storage limitation.
The Group companies adopt appropriate technical and organisational measures to ensure the security, confidentiality and integrity of the information processed.
Information relating to the processing of personal data is provided to the data subjects by means of a specific privacy policy.

11. RECORDS RETENTION

The documentation relating to the reports is kept in accordance with the procedures and for the period provided for by the applicable legislation and the provisions adopted by the Group companies.

12. POLICY VIOLATIONS

The following are violations of this Policy, but are not limited to:

- the adoption of retaliatory behaviour against protected subjects;
- obstructing the submission or handling of reports;
- unauthorized disclosure of confidential information;
- the improper use of reporting channels;
- the submission of reports that are knowingly false or submitted in bad faith.

Violations may result in the adoption of disciplinary, contractual or other measures provided for by applicable laws and company regulations.

13. FINAL PROVISIONS

This Policy applies to all Group companies and is subject to periodic review to ensure continued alignment with regulatory, organisational and governance requirements.
Group companies may adopt procedures, operating instructions and local communications to address specific organisational or regulatory requirements, provided that they are consistent with the principles established by this Policy.