



SAES Group

Whistleblowing Policy

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Whistleblowing Policy

1. Objective

The purpose of this document is to remove the factors that may hinder or dissuade persons from using the institution of whistleblowing. In that perspective, the aim pursued by this procedure is to provide to the whistleblower (“Whistleblower”) clear operating instructions regarding the subject, contents, recipients and methods of sending complaints, as well as on the forms of protection offered to him/her, to remove doubts and uncertainties regarding the procedure to be followed and any fears of retaliation or discrimination.

The aim of the policy and of the Whistleblowing system is to provide protection to those making complaints of non-compliance with the laws or regulations, policies, rules or company procedures (particularly with reference to episodes of fraud, corruption or other violations of the Code of Ethics), as indicated in more detail below in this document. The aim pursued by the tool is to prevent and intercept, in order to remedy and correct them, any implementation of irregularities within the organisation but also to involve all stakeholders, in general, in the activity of combating non-compliance, through active and responsible participation.

SAES provides an internet platform with open access by Employees, Collaborators, Suppliers and Business Partners, specifically used as a channel for reporting complaints by anyone in SAES Group, in relationships with the same or on its behalf which constitute or may constitute a violation, or inducement to the violation, of laws and regulations, principles ratified in the Code of Ethics, principles of internal control, policies, rules and company procedures and/or which may cause, directly or indirectly, economic-financial damage or damage to image for companies of the SAES Group.

There is no comprehensive list of crimes or irregularities that may constitute the subject of whistleblowing.

The Complain may concern as follows:

- violations of the Code of Ethics and Supplier Code of Conduct, Anti-corruption Code and Code of Business Conduct;
- violations likely to cause financial prejudice to the SAES Group;
- violations likely to cause damage to the health and safety of persons, users and citizens or to cause damage to the environment;
- prejudice to users or employees or other persons who perform their activity at the company;
- violation of human rights;
- privacy violations.

Whistleblowing does not concern the personal grievances of the whistleblower or claims/demands involved in the regulation of the employment relationship or relationships with hierarchical superiors or colleagues, for which reference must be made to normal company procedures.

No negative consequence derives for persons who make a complaint in good faith and the confidentiality of the whistleblower's identity is guaranteed.

Communications relating to commercial activities (e.g. complaints due to invoicing, guarantees, products, etc.) must be channelled through the customer service tools provided for that purpose. The exercise of the rights of the data subject for privacy purposes must be sent by email to privacy@saes-group.com

2. How to make complaints

2.1. Online platform for complaints

Reports may be submitted by accessing the homepage of the Group website, “About Us” section, or by clicking directly on: <https://segnalazioni.saesgetters.com>.

Access to the Whistleblowing platform via the SAES website is subject to the “no-log” policy: this means that, even if the reporting platform is accessed from a computer connected to the company network, this would not be traced in any way by the company information systems, in further protection of the whistleblower.

The platform is external to the website and to the SAES network, namely Globaleaks, open-source and free of charge software created to facilitate the launch of secure and anonymous whistleblowing initiatives. The software is developed by the Hermes Centre for Transparency and Digital Human Rights.

2.2. Email address

Complaints may also be made by email to the email address segnalazioni@saes-group.com.

Complaints sent via the email address are permitted so long as the reported circumstance is described in detail and that it includes accurate information, such as: description of the event, times and locations, personal details of the person who committed the act, any witnesses and relevant documentation.

Complaints received via the email address segnalazioni@saes-group.com are entered on the whistleblowing portal by the Recipient in order to keep a track of them.

3. Content of complaints

Complaints must be made in good faith; they must be detailed with precise information, so that they can be verified and managed without the need to involve the whistleblower and corroborated by elements that are not manifestly groundless. The complaint, more specifically, must: a) contain a clear and complete description of the circumstance; b) define the times and location in which the circumstance occurred; c) indicate the personal details (where possible) of the person who implemented the acts; d) indicate (where existing) the witnesses to the act; e) make reference to relevant documentation and to how the information was discovered.

With reference to the whistleblowing portal, the reporting platform involves a guided path for the whistleblower, through a series of open and closed questions, some mandatory, others optional, concerning facts, time context, economic dimensions, personal details of the whistleblower (optional), additional supporting elements, with the aim of identifying, from the outset, complaints that are not responsible or not significant.

Whistleblower may decide not to provide the personal details, as the complaint may also be made entirely anonymously.

4. Sending of complaints

With reference to the whistleblowing portal, after making the complaint, the whistleblower is issued with a code, which can be used to access the complaint again later and to monitor its stage of progress. A sort of direct discussion can thereby be established with the whistleblower him/herself, always in completely

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anonymity, through which it is possible to request, if necessary, additional details or supporting elements of the complaint itself. A copy of the Complaint is not sent to the Whistleblower; the latter must therefore note down the identification code of the Complaint so that it can be accessed again.

5. Management of complaints

Complaints sent via the whistleblowing portal and/or by email to the address segnalazioni@saes-group.com are received by Group General Counsel ("Recipient").

Within 5 working days, the Recipient provides a response to the whistleblower in relation to the receipt and acceptance of the complaint.

The Recipient may, if necessary, involve other competent company functions (by way of example, HR, Internal Audit) in order to manage the complaint, after having made it anonymous (if it was not initially anonymous or if the complaint on the system contains the whistleblower's identification details).

If the complaint has implications for the purposes of Italian Legislative Decree 231/01, the Recipient also informs the Supervisory Body regarding the launch of the investigation.

All employees are required to collaborate, if they are involved in the investigation, without omitting relevant information.

If the Recipient, after an assessment, believes that:

- the complaint relates to a simple personal grievance,
- the complaint is clearly groundless or made in bad faith,
- that the reported act has already been verified,
- not detailed (if no additional elements have been provided or those provided are not sufficient and the Whistleblower does not supplement what is requested) and therefore not verifiable,

he/she archives the complaint.

In the other cases, the Recipient will, in respect of principles of impartiality and confidentiality, performing all activity deemed opportune and involving, if necessary, the competent company functions, verify the foundation of the circumstances represented in the complaint.

The investigation, except in exceptional cases, may last for up to 30 days. In complex cases, this may be extended by a further 30 days (subject to communication to the whistleblower, via the platform/email).

With reference to the whistleblowing portal, the whistleblower is informed, via the platform, of the dismissal of the complaint or its acceptance. To that end, it is important for the whistleblower to retain the identification code of the complaint which is generated automatically by the system after completing the whistleblowing form. This is the only way to be able to dialogue with the Recipient, to obtain feedback on the status of the complaint and to perform the investigation activities in a detailed and precise manner. The identification code of the complaint expires after 75 days at the end of which the whistleblower will no longer be able to access the complaint.

Whistleblowers are reminded to access the complaint periodically to assess its stage of progress and/or to respond to any requests for information by the Recipient necessary to carry out the investigation activities.

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As regards complaints sent by email, the acceptance of the complaint along with the request for further information by the Recipient is made to the whistleblower through the reciprocal exchange of e-mail.

Information exchanged between the various persons is also tracked on the whistleblowing portal by the Recipient.

In the case of ascertained foundation of the complaint, SAES will take the measures deemed appropriate and the actions to protect the Company and the Group. If, at the outcome of the verification, the complaint is found to be well-founded, the Recipient, in relation to the nature of the violation, may: a) lodge a complaint with the competent judicial authority; b) communicate the outcome of the assessment to the Head of the structure to which the perpetrator of the ascertained violation belongs, so that he/she may adopt the relevant management methods, including, if the presuppositions are in place, the exercise of disciplinary action; c) communicate the outcome to Company Management and to the structures responsible for taking any further measures and/or actions that are necessary in the specific case to protect the Company.

At the outcome of the investigation, the Recipient informs the whistleblower via the whistleblowing platform and/or by email for complaints sent by email.

The Recipient may complaint, where applicable as to Italian Law, to the Supervisory Body (for 231 Italian law violation) and to the Board of Statutory Auditors, in relation to the respective duties and responsibilities, on the complaints received, of which he/she has ascertained the foundation and for which he/she has proposed and implemented an intervention plan.

6. Protection of whistleblower

SAES prohibits acts of retaliation or discrimination, of any nature, direct or indirect, against the whistleblower for reasons linked, directly or indirectly, to the complaint or against those who collaborated in the activities of ascertaining the foundation of the complaint. SAES guarantees the anonymity of the whistleblower, even where personal details are indicated, and sanction may be applied against anyone who implements or threatens to implement acts of retaliation against those who have submitted complaints as part of this policy or against those who, with wilful intent or gross negligence, have made complaints that are found to be groundless.

In addition, in general, the Company reserves the right to assess each time the individual behaviours and to apply the most suitable disciplinary measure based upon the severity of the episode, in relation to the role and duties performed by the relevant workers, the specific context in which the behaviours subject to disciplinary action were implemented, taking account of the objective severity of the act or intensity of the intentional element.

7. Responsibility of whistleblower

The whistleblower is responsible for making complaints in good faith and in line with the declared spirit of the project: complaints that are manifestly false or entirely groundless, opportunistic and/or made only for the purpose of damaging the reported person or persons in any case involved in the complaint will not be taken into consideration.

It is worth noting that this procedure is without prejudice to the criminal and disciplinary liability of the whistleblower in circumstances of libellous or defamatory complaints. Any forms of abuse of this policy, such

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as complaints that are manifestly opportunistic and/or made with the sole aim of damaging the reported person or other persons, and any other circumstance of improper or intentional incorrect use of the institution subject to this procedure are also the source of liability, in the disciplinary and other competent venues.

8. Rights of reported person

During the verification and assessment activity of any non-compliance, the individuals subject to the complaints may be involved or notified of this activity but in no case will proceedings be brought merely due to the complaint, in the absence of concrete findings with regard to its content. This may occur based upon other evidence identified and ascertained based upon the complaint itself, in respect of existing regulations.

9. Privacy

The processing of personal data as part of complaints will be carried out in respect of the regulations on personal data protection and any other applicable laws and/or regulations.

Data. As part of the management of complaints, both the personal data of the whistleblower, where the complaint is named, and those of the reported person(s) will be processed.

The identity of the whistleblower should never be disclosed to the reported person, except in the cases envisaged by law, so as to avoid retaliation, threats, violence, etc. and to protect the former's confidentiality. That said, if there is a substantial risk that communicating the relevant information may compromise the capacity to verify effectively the foundation of the Complaint or to obtain the necessary proof, the reported person may not be informed in relation to the registration of his/her data, for as long as this is necessary to guarantee the correct management of the investigations and in any case in respect of what is established in the applicable national collective agreement. In no case may the reported person use his/her right of access to obtain information on the whistleblower's identity, unless the latter has made a complaint in bad faith.

Purpose of data processing. The processing will occur in order to manage, process, investigate and resolve the complaint, as well as to establish any disciplinary measures or otherwise to adopt the measures adequate to the specific case. The preparation of a regulatory tool to be followed for complaints responds to precise requirements of internal control of the company and monitoring of the company risks, specifically dictated by law.

The Data Controller is SAES Getters S.p.A.

Data Processor. The data processor, by virtue of the deed of appointment issued by the controller, is General Counsel.

Data processing methods. In relation to the indicated purposes, the Data will be processed using manual and/or electronic tools that guarantee the protection of the data by design or default, adequate to guarantee their security and confidentiality, and with logics closely related to those purposes, by persons to whom SAES Getters has given adequate operating instructions with particular reference to the security measures adopted.

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Type of data processed. The Data processing may concern, in addition to common personal data, also sensitive personal data or those that may reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data used to identify uniquely a natural person, data relating to health or sex life or sexual orientation of the person. The sensitive data correspond to the data belonging to the “special categories” indicated in Art. 9 of Reg. (EU) 679/2016 (known as GDPR).

Those data will be processed exclusively where strictly necessary in order to manage the complaint, in compliance with principles of proportionality and necessity.

Provision of data. The provision of personal data relating to the reported person for the purposes relating to managing the Complaints is strictly necessary. Any failure to provide the data of the reported person involves the impossibility of fulfilling the verification activity described above. The provision of personal data of the whistleblower is, on the other hand, optional.

Communication of data. Personal data contained in the Complaints may be communicated and/or disseminated to the company bodies and to natural persons of internal offices and functions, as well as to the Judicial Authority, to activate the judicial and/or disciplinary protection connected to the Complaint. The personal data subject to the complaint may be communicated, if necessary and in respect of principles of proportionality and lack of excess to auditing companies and/or consultants of SAES Getters SpA or subsidiary companies involved. This is subject to legal obligations and protection of the rights of the controller or the persons (natural or legal) in any case involved in and/or connected to the Complaint.

Data storage. The personal data collected as part of a Complaint are stored for 75 days unless the data must be made available to the Judicial Authority.

Transfer of data abroad. Any personal data may be transferred outside the national territory (also outside the European Union) with the purpose of processing complaints.

In any case, this transfer will take place in compliance with the applicable regulation taking appropriate guarantees; and, specifically, adopting the Standard Contractual Clauses of the European Commission, related to the international transfer of personal data, which can be requested contacting the controller at the contact addresses indicated below. Data subject will be entitled to obtain also a copy of the data held outside and information about the place where such data is stored by expressly requesting it to the Data Controller.

Rights of the data subject. At any time, the data subject may exercise the other rights granted in accordance with the regulations on personal data protection in force and, in particular: the right to request from the data controller confirmation as to whether or not personal data concerning him or her are being processed, access to the personal data and rectification or erasure of the same or restriction of processing of the data; the right to object to processing for one or more of the respective purposes and/or in relation to one or more of the details provided; the right to data portability; the right to lodge a complaint with the Judicial Authority, or a complaint with the Data Protection Supervisor.

At any time, the data subject may also request the full list of data recipients.

Those rights may be exercised by writing to the email address: privacy@saes-group.com or, by post, to the address of Viale Italia 77, 20020 Lainate, Milan (for the attention of the Legal Department).

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For information or clarifications on rights, or on personal data processing, the data subject may contact us at the same details.