

# COMPLAINTS AND WHISTLEBLOWING POLICY

ITALPREZIOSI<sup>®</sup>

# 1. INTRODUCTION AND PURPOSE

Italpreziosi is committed to maintaining the highest standards in terms of conduct, integrity, and ethical behavior, as summarized in the Code of Ethics and other corporate policies.

The purpose of this Policy is to create a mechanism that allows every internal or external stakeholder of the company to submit a report of unlawful conduct that may constitute a violation of laws and regulations, values, and principles sanctioned in the Code of Ethics and/or that may cause damage of any kind to the company, customers, shareholders, partners, third parties and, more generally, to the community and/or the public administration, of which they have become aware in the work context.

Without prejudice to the above, this policy must be interpreted and, where necessary, integrated in light of the provisions of Legislative Decree 24/2023 and the regulations presupposed by it.

This Whistleblowing Policy aims to regulate the process of receiving, analyzing, and processing Reports, sent or transmitted by anyone, and applies to collective and individual grievances or complaints relating to any activity of Italpreziosi.

This policy applies to all subjects indicated by Art. 3 of Legislative Decree 24/2023 and therefore, by way of example, to employees, self-employed workers who have relationships with the company, holders of collaboration relationships, suppliers of goods or services to the company, freelancers and consultants, trainees, and all those who perform functions of administration, management, control, supervision, and representation of the company.

The objective of the policy is to encourage, by providing the protections provided for by Legislative Decree 24/2023, the reporting of violations of laws and regulations and, more generally, of behaviors or risks detrimental to the interests of the company, the community, and more generally of all stakeholders. To this end, it is specified that the violations subject to potential reporting consist of behaviors, acts, or omissions that harm the interests indicated above and which consist of all administrative, accounting, civil, and criminal offenses better indicated in Art. 2 of Legislative Decree 24/2023, as well as all unlawful conducts relevant under Legislative Decree 231/2001.

By way of non-exhaustive example, therefore, relevant violations for the purposes of this policy include, but are not limited to, those regarding:

- health, safety, working conditions;
- human rights violations;
- gender-based violence or discrimination (ref. *Equality and Inclusion Policy*);
- violations related to mental health and psychosocial risks;
- trade, extraction, export, and transport of precious metals;
- environmental protection, environmental impacts, and risks;
- compliance and legal affairs;
- financing of terrorism and money laundering;
- fraud, corruption, and other laundering;
- tax-related crimes.

The company provides information on the channel, procedures, and requirements for making internal and external reports.

It is also specified that, in the cases provided for by Art. 6 of Legislative Decree 24/2023, the whistleblower may make the report through the so-called external reporting channel referred to in Art. 7 of said decree, to the National Anti-Corruption Authority (ANAC).

## 2. SOURCES

Our reference sources for this Policy are both internal to the company (e.g., *Code of Ethics*, *Supply Chain Policy*, *Equality & Inclusion Policy*, *Human Rights Policy*) and external, such as:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Supplement on Gold;
- LBMA Responsible Gold Guidance;
- UN Guiding Principles on Business and Human Rights;
- Responsible Jewellery Council Code of Practices and Chain of Custody;
- The World Gold Council Conflict-Free Gold Standard;
- Law 179/2017;
- EU Directive 2019/1937 (Protection of persons who report violations of Union law);
- Legislative Decree 24/2023;
- Legislative Decree 211/2025;
- Legislative Decree 231/2001;
- Regulation (EU) 2016/679 – GDPR.

## 3. GRIEVANCE MECHANISM PROCEDURE

Pursuant to Art. 4 of Legislative Decree 24/2023, the company has established the Compliance Office as its internal department dedicated to the management of reporting procedures. The company has established specific internal and external reporting channels to guarantee the confidentiality of the identity of the reporting person, the person involved, and any person mentioned in the report, as well as the content of the report and the relative supporting documentation.

To make a report, it is sufficient to use one of the following channels:

- **Online platform:** [italpreziosi.whistletech.online](https://italpreziosi.whistletech.online);
- **Dedicated email:** [reclami@italpreziosi.it](mailto:reclami@italpreziosi.it);
- **Dedicated telephone line:** 0575 1596749 (request the Compliance Office);
- **Letter to the address:** Strada A n. 32, Località San Zeno, 52100, AR, Italy - addressed to the Compliance Office;
- **In person to the Compliance Officer** (address: Strada A n. 32, Località San Zeno, 52100, AR, Italy).

The Compliance Officer is responsible for monitoring incoming external reports and keeping the Due Diligence Commission informed regarding relevant risks.

As part of the internal management of the report, the person in charge is obliged to perform certain activities, including issuing an acknowledgment of receipt of the report to the reporting person within seven days of the date of receipt; maintaining communication with the reporting person (and requesting additions from the latter, if necessary); diligently following up on the reports received; providing feedback on the report within three months from the date of the acknowledgment of receipt or, in the absence of such acknowledgment, within three months from the expiration of the seven-day deadline following the submission of the report.

Furthermore, if the report is made orally, the Compliance Officer must, with the consent of the reporting person, record the report in minutes and implement all suitable precautions to guarantee that such minutes are not accessible.

A minimum level of information is required, such as the name of the person or entity concerned, a description of the facts, the date, time period, and locations.

After the complaint, it will be evaluated whether it is in line with the purpose of this Policy, considering the type of information and the evidence provided. If the information and evidence provided are sufficient, Italtreziosi will open an investigation: the members of the Compliance Office, supported by the RSG, record the report, the analysis of the causes, any corrective action taken, and its effectiveness evaluated over time in a specific electronic document (NC Register). Non-anonymous reporting persons will be informed of the outcome of the investigation. Information and investigations will be treated with the utmost confidentiality in accordance with applicable privacy regulations.

The Compliance Office operates with maximum autonomy and independence. It is not subject to instructions or influence from Management regarding the analysis and management of specific reports received.

Should a report directly concern the Compliance Officer or a member of the Compliance Office, the reporting person must address the communication exclusively to the Supervisory Body (OdV) via confidential letter. In this case, the reported subject will be automatically excluded from every phase of the preliminary investigation.

For reports related to the origin of precious metals, the Compliance Office will initiate an "Enhanced Due Diligence" verification. Should the investigation confirm risks of human rights violations or conflict financing, Italtreziosi will proceed with the immediate suspension or termination of the relationship with the supplier concerned, in accordance with the corporate Supply Chain Policy.

## 4. CONFIDENTIALITY AND PROTECTIONS

Reports shall not be used beyond what is necessary to provide an adequate follow-up to them. The identity of the reporting person and any other information from which this identity can be inferred, directly or indirectly, shall not be revealed, without the express consent of the reporting person, to persons other than those competent to receive or follow up on the reports, who are expressly authorized.

For the entities and reporting persons, the right not to suffer any retaliation shall be guaranteed and therefore, without prejudice to the provisions of Art. 17 of Legislative Decree 24/2023, they may not, by way of example, suffer:

1. dismissal, suspension from the employment relationship, or measures with an equivalent effect;
2. demotion or lack of promotion;
3. change of functions, place of work, reduction in salary, or modification of working hours;
4. suspension from training activities or restrictions on access to them;
5. adoption of disciplinary measures or other sanctions of a pecuniary nature; etc.

The protection measures against retaliation apply not only to the reporting person but also to facilitators (natural persons who assist the reporting person in the reporting process operating within the same work context). Protection is extended to third parties in the same work context linked to the reporting person by a stable emotional bond or kinship up to the fourth degree. Colleagues of the reporting person who work in the same context and who have a regular and ongoing relationship with them are likewise protected.

The reporting person may request assistance from Third Sector Entities included in the specific list established by ANAC, which provide information, assistance, and consultancy free of charge on the reporting methods and on protection against retaliation.

It is recalled that obstructing a report, violating the duty of confidentiality, or failing to analyze reports exposes the Company to administrative pecuniary sanctions imposed by ANAC pursuant to Legislative Decree 24/202.

## 5. PROCESSING OF PERSONAL DATA

Every processing of personal data shall be carried out in accordance with Regulation (EU) 2016/679, Legislative Decree No. 196 of June 30, 2003, and Legislative Decree No. 51 of May 18, 2018.

Personal data that are clearly not useful for the processing of a specific report are not collected or, if accidentally collected, shall be deleted immediately.

## 6. RETENTION OF DOCUMENTATION

Internal reports and the relative documentation are kept for the time necessary to process the report and, in any case, for no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations.

In the event that an unregistered telephone line is used for the report, the report is documented in writing by means of a detailed report of the conversation prepared by the designated personnel. In such a case, the reporting person has the right to verify, rectify, and confirm the content of the transcript through their own signature.

When, at the request of the reporting person, the report is made orally during a meeting with the Compliance Officer, it is documented—subject to the consent of the reporting person—by the person in charge by means of recording on a device suitable for storage and listening or by means of minutes. In the case of minutes, the reporting person may verify, rectify, and confirm the minutes of the meeting through their own signature.

## 7. CONDITIONS FOR THE PROTECTION OF THE REPORTING PERSON

Without prejudice to the application of the protection measures provided for by Legislative Decree 24/2023 for the reporting person, it is specified that should the reporting person be convicted—even by a first-instance, and thus non-definitive, judgment—for the crimes of defamation or slander, or be subject to a civil conviction for the same acts of defamation or slander in cases of willful misconduct or gross negligence, the reporting person shall be liable to a disciplinary sanction commensurate with the act committed, and the protective measures regulated by Legislative Decree No. 24/2023 will not be guaranteed. The specification of the disciplinary sanctions provided for such cases is set out in the Model pursuant to Legislative Decree 231/2001 adopted by Italtreasures.

## 8. TRAINING AND INFORMATION

Italtreasures is committed to ensuring widespread knowledge of this policy through periodic training activities aimed at all personnel. The objective of the training is to instruct collaborators on the technical methods for using the platform and on the protective rights provided by law, promoting a corporate culture based on integrity and the prevention of unlawful acts.