

Whistleblowing

policy

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Description

This document replaces the Group's previous Whistleblowing Policy approved by ADR's Board of Directors on 4th December 2020, amended to take into account the regulatory changes introduced by Legislative Decree No. 24 of 10 March 2023 implementing Directive (EU) 2019/1937 and the guidance received from Munds.

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1. Objective of the document and scope of application

1.1 Preamble

The ADR Group combines sound business and financial discipline with a commitment to operating in accordance with environmental, ethical and governance principles that meet the highest international standards. In all its activities, the Group requires ethical and professional integrity, a correct behaviour and full compliance with the laws and regulations of all the countries in which it operates, as well as with honesty, reliability, impartiality, loyalty, transparency, fairness and good faith principles.

In line with international best practices and in full compliance with applicable regulations, ADR S.p.A. has implemented a process for collecting and managing reports.

The existing whistleblowing management system has the following features:

- management of whistleblowing in each Group Company, through specific whistleblowing channels and accountability to the Whistleblowing Team for the sake of timeliness and effectiveness of analysis;
- the provision of common mechanisms for detecting and managing any conflicts of interest in the process of managing reports;
- the assignment, without prejudice to the collegiality of the Whistleblowing Team, of a key role to the Internal Audit function in the management of the process, from the receipt of reports to the execution of the preliminary investigation;
- provision of information flows with the other actors of the Internal Control and Risk Management System.

ADR's Subsidiaries share with ADR S.p.A. the internal whistleblowing channels and their management pursuant to Article 4 of Legislative Decree no. 24/2023, or they set up their own channels, entrusting their management to the Whistleblowing Team.

1.2 Objectives of the document

This document (hereinafter also 'the Policy') regulates the process whereby reports are received and handled (so-called 'whistleblowing') in accordance with Legislative Decree No. 24 of 10 March 2023 implementing Directive (EU) No. 2019/1937 and in compliance with the legislation on privacy or any other legislation in force and also in line with the indications received from the parent company Mundys, as ruled by the Whistleblowing Management Guideline.

1.3 Scope of application and starting date

The Policy shall apply to ADR S.p.A. following its approval by the Board of Directors of ADR S.p.A. and also submits the same to its Subsidiaries which will be required to take into account of this Policy or to amend its implementation by making any changes that take account of the organisational context, providing ADR with a reasoned explanation.

Any future substantial changes¹ to the Policy must be approved by ADR Board of Directors.

The Policy addressees to the Top Management, members of the Corporate Bodies, employees (direct, indirect, interns and trainees), as well as third parties (e.g., customers, suppliers and consultants) who are entitled to make a whistleblowing, if in possession of information on violations – i.e. conduct, acts or omissions detrimental to the public interest or integrity of Group companies – (or alleged violations) of:

- Rules and regulations;
- the Code of Ethics;
- Model 231;
- the Anti-Bribery Procedure;
- the Conflict of Interest Management Procedure;
- Management System for the Prevention of Corruption implemented by ADR S.p.A. pursuant to the UNI ISO 37001 standard;
- the Corporate internal regulatory framework (policies, procedures, etc.);

as well as information on events likely to damage the assets or image of ADR².

The application of Legislative Decree 24/2023, and therefore of this Policy, does not apply to objections, claims or requests linked to an interest of a personal nature of the reporting person that relate exclusively to his or her individual working relationships, or inherent to his or her working relationships with hierarchically superior roles.

¹ Changes to this document as a result of minor organisational/ corporate adjustments (e.g. change of name of organisational functions and/or names of bodies involved in the process) and, in general, changes that do not entail substantial changes to the process, roles and responsibilities are excluded.

² For a more specific knowledge of the types of violations, please also refer to Article 2(1)(a) of Legislative Decree No. 24 of 2023: (i) administrative, accounting, civil and criminal offences harming the interests, decorum and integrity of the company; (ii) unlawful conduct relevant pursuant to Legislative Decree 231/01 or violations of the Organisation, Management and Control Model; (iii) offences falling within the scope of the Community Directive governing specific sectors such as public procurement, services, products, transport safety, environmental protection, radiation protection and nuclear safety, food and feed safety and animal health and welfare, public health, consumer protection and protection of personal data, network and information system security; (iv) acts and omissions affecting the Union's financial interests; (v) acts and omissions concerning the EU internal market.

2. Definitions, abbreviations and acronyms

For the purposes of this Policy, the terms listed shall have the following meanings:

ADR Group: ADR S.p.A. and its direct and indirect Subsidiaries.

Anti-bribery procedure: the Mundys Group's Anti-Bribery Procedure adopted also by ADR Group.

Code of ethics: the Code of Ethics defined by Mundys S.p.A. and adopted by Group companies, which identifies the essential core of values that make up the corporate culture and are translated into the management principles and policies that underlie daily operations.

Enabler: a person who assists a whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential.

Model 231: the Organisational, Management and Control Models (pursuant to Italian Legislative Decree 231/2001) respectively adopted and implemented by ADR S.p.A. and its Subsidiaries, in order to prevent the perpetration of offences under Italian Legislative Decree 231/2001.

Mundys group: Mundys S.p.A. and its direct and indirect Subsidiaries.

Report: an oral or written communication concerning facts that are considered as: unlawful conducts or irregularities; violations of regulations; actions likely to cause damage to the company's assets or image; violations of the Code of Ethics; violations of the Anti-Bribery Procedure; violations of Model 231; violations of company procedures and provisions.

Reporting subject: any subject (both inside and outside the ADR Group) who makes a Report, having obtained information on the matters referred to above.

Reported subject: any subject to whom the facts subject to a report relate or can be attributed.

Retaliation: any conduct, act or omission, even if only attempted or threatened, committed because of a whistleblowing report or a complaint to the judicial or accounting authority or public disclosure, and which causes or may cause the whistleblower or the person making the complaint, directly or indirectly, an unjust prejudice.

Supervisory Body or SB: the Supervisory Bodies respectively established in ADR S.p.A and its Subsidiaries pursuant to Article 6 of Italian Legislative Decree no. 231 of 2001, responsible for supervising the functioning, effectiveness, observance and updating of the 231 Models.

Whistleblowing register: the register, maintained by the Technical Secretariat of the Whistleblowing Team, containing all the information related to each whistleblowing received.

Whistleblowing team: the collegiate body responsible for the reporting process, which assesses the adequacy of the process, suggests any improvements to the process to the Board of Directors, and promotes the necessary awareness-raising and training measures for the Company's workforce. In ADR it consists of the heads of the following departments: Internal Audit, Human Capital, Organization & Procurement, General Counsel & Compliance, CFO, Risk Governance & Compliance.

Whistleblowing team coordinator: it is represented by the Head of Internal Audit, who governs the whistleblowing process from their receipt to the closure of the investigation. He is entitled to represent – if necessary – the Team at meetings with the Administration, Management and Control Bodies.

Whistleblowing team technical secretariat: resource(s) identified by the Whistleblowing Team to support the organisation of the activities of this collegial body (e.g., convening and organising meetings, taking minutes, managing the documentary and electronic archives).

3. Reference standards and principles

The provisions of this Policy shall be supplemented by the provisions of:

- The Group's Code of Ethics;
- All company rules and regulations, including Model 231, the Anti-Bribery Procedure, Human Rights Framework, Diversity, Equality and Inclusion Guideline, Management System for the Prevention of Corruption, the Internal Control System Guidelines for Financial Reporting and the Tax Compliance Model;
- Italian Legislative Decree No. 231 of 8 June 2001, as amended;
- European Regulation 2016/679 for the protection of personal data (GDPR), Italian Legislative Decree No. 196 of 30 June 2003 as amended and supplemented – (Privacy Code) and European and national legislative interventions and/or measures by the competent authorities (Privacy Regulation);
- Italian Legislative Decree No. 24 of 10 March 2023 implementing Directive (EU) 2019/1937.

4. The process: tasks and responsibilities

The process consists of the following stages:

- receipt of reports;
- preliminary verification of reports;
- ascertainment of reports;
- closing of reports.

4.1 Receipt of reports

In order to ensure the effectiveness of the reporting process and provide total and indiscriminate access to all those who wish to make a report, ADR provides a number of alternative channels, specifically:

- an IT platform, accessible by all Reporting subjects (Employees, Third Parties, etc.) on ADR's website <https://www.adr.it/web/aeroporti-di-roma-en/whistleblowing-gruppo-adr> in which it is possible to report in written or oral form;
- e-mail, at the following address: segnalazioni.adr@adr.com;
- ordinary mail, at the following address: ADR S.p.A., Team Segnalazioni ADR, via Pier Paolo Racchetti 1, 00054, Fiumicino (RM).

Verbal reports may also be made asking a one-to-one meeting with the Whistleblowing Team or one or more of its members, if requested by the whistleblower³.

Where possible, use of the first channel (the IT platform) is preferable.

Similarly, although anonymous reports, represent a feasible alternative at ADR, the Group suggests that Reporting subjects choose non-anonymous reports, for the sake of the speed and effectiveness of investigations. Guarantees and protections for Reporting subjects are set out in the dedicated section, to which reference should be made.

The Whistleblower may also report through external channels⁴ or make a public disclosure⁵ under certain conditions regulated by law.

The Whistleblowing Team Co-ordinator records the Reports received in a special Register, maintained by the Technical Secretariat, containing (and keeping up to date throughout the whistleblowing management process) the following information, if and to the extent applicable:

- a) sequential entry number;
- b) date and whistleblowing receiving channel;
- c) Group Company involved, if any, and relative request for feedback;
- d) Whistleblower name (if communicated) and alphanumeric code assigned to him/her;
- e) Whistleblowing subject and summary;
- f) type of alleged violation reported;
- g) date of initiation and conduct of preliminary investigation;
- h) preliminary investigation status;
- i) decision of the Whistleblowing Team at the end of the preliminary investigation;
- j) list of the authorised persons⁶ - on the basis of the "need to know" criterion - to know the existence and/or the content of a report and the identity of the mentioned persons, as well as - where permitted by law - of the Whistleblowers;
- k) any additional notes.

³ In case of report made orally during a meeting with the Whistleblowing Team or its member in charge, the report with the whistleblower consent, shall be documented. In the case of minutes, the whistleblower may check, correct and validate the minutes by his or her signature.

⁴ Towards the National Anticorruption Authority ("ANAC") or other parties other than ANAC (e.g. the Anti-Corruption and Transparency Prevention Officer, the Judicial and Accounting Authorities) who forward them to it. According to Article 6 of Legislative Decree no. 24 of 10/03/2023 the possibility of reporting through external channels is provided for if, at the time the report is submitted, one of the following conditions is met (a) the mandatory activation of the internal reporting channel is not envisaged within his work context, or this channel, even if mandatory, is not active or, even if activated, does not comply with the provisions of Article 4; (b) the whistleblower has already made an internal report pursuant to Article 4 and the same has not been followed up (c) the whistleblower has reasonable grounds for believing

that, if he or she were to make an internal report, it would not be effectively followed up or that the report might give rise to the risk of retaliation; (d) the whistleblower has reasonable grounds for believing that the breach might constitute an imminent or obvious danger to the public interest.

⁵ According to Article 15 of Legislative Decree no. 24 of 10/03/2023 the possibility of making a public disclosure is provided for if, at the time of the public disclosure, one of the following conditions is met (a) the reporting person has previously made an internal and external report, or has made an external report directly, under the conditions and in the manner laid down in Articles 4 and 7, and no response has been received within the time limits laid down in Articles 5 and 8 regarding the measures envisaged or adopted to follow up the reports; (b) the reporting person has well-founded reason to believe that the breach may constitute an imminent or obvious danger to the public interest (c) the person making the report has reasonable grounds for believing that the external report may involve a risk of

retaliation or may not be effectively followed up because of the specific circumstances of the case, such as where evidence may be concealed or destroyed or where there is a well-founded fear that the person who has received the report may be in collusion with or involved in the author of the breach.

⁶ Considering the need for stipulating a specific NDA and/or specific appointment pursuant to the privacy regulations (Art. 2 quaterdecies Privacy Code pursuant to Article 29 GDPR).

4.1.1. Receipt of 'out-of-channel' reports

It is not unusual for Whistleblowings to be received through channels other than the official channels set out in the text of the Policy (e.g. anonymous letters sent for the attention of Management and Top Management). Any employee who is the recipient of a Report received outside the official channels has the responsibility and the moral duty to, in the order and in relation to the specific situation:

- make the Whistleblower, if identifiable, aware of the importance of forwarding the report through official channels;
- transmit to the Whistleblowing Team, through official channels, the Report received, specifying the source to the extent known.

4.1.2. Content of reports

The Reporting subject makes Reports by providing the "information on the violations⁷" at their disposal, according to legislation in force.

The subsequent stages of preliminary verification and investigation are facilitated by Reports with precise and detailed content, such as, by way of example:

- the identity of the Reporting subject (i.e. personal and contact details), in cases where anonymity has not been opted for;
- a clear and complete description of the facts reported, with an indication of the known circumstances (manner, time and place);
- the identity of the Reported subject(s), insofar as known;
- an indication of any other persons who may report on the facts being reported;
- any documents – also in physical form – substantiating the report;
- any other useful information in relation to the facts that are the subject of the whistleblowing and any documentation supporting the validity of the Report.

⁷ Article 2(1) of the Decree defines 'information on violations' as information, including well-founded suspicions, concerning violations committed or which, on the basis of concrete elements, could be committed in the organisation with which the reporting person or the person lodging the complaint with the judicial or accounting authority has a legal relationship within the meaning of Article 3(1) or (2), as well as elements aimed at concealing such violations.

4.2 Preliminary verification of reports

The Coordinator shall analyse the reports received and should the report:

- contain precise, detailed and verifiable information, provide notification of receipt to the whistleblower within seven days of receipt and initiate the relevant investigation; otherwise, should the report contain unsubstantiated and/or unverifiable information, and should the Reporting subject not be available to provide the necessary additional information, file the report;
- relate to matters that – albeit concerning ADR Group – do not fall within the scope of application of this document and/or into whistleblowing legislation (so-called "non-related reports", such as, by way of example, commercial complaints, commercial proposals, marketing activities), forward the report to the department of ADR or its Subsidiaries responsible for handling the matter.

At the first available meeting, the Coordinator shall report on the reports referred above to ADR S.p.A.'s Whistleblowing Team, providing reasons for the choices made.

ADR S.p.A.'s Whistleblowing Team may, if deemed necessary, request further information from the Coordinator.

ADR S.p.A.'s Whistleblowing Team may also reserve the right to handle instances concerning a subsidiary when it perceives a significant impact on the Group or other Group companies. Moreover, it cannot be excluded that a report relating to ADR or its Subsidiaries may have a significant impact for the Mundys Group.

In this case, as part of the preliminary verification phase, if the ADR's Whistleblowing Team assesses the Report as particularly relevant for Mundys Group as a whole in the light of any significant impact (e.g., reputational and/or economic/financial damage) will inform Mundys S.p.A.'s Whistleblowing Committee of any action to be taken, in addition to the receiving Company's ordinary Report management process. On completion of the Report, the ADR's Whistleblowing Team shall inform Mundys's Whistleblowing Committee of the outcome of its checks.

The Coordinator shall convene the Whistleblowing Team for evaluating all questionable cases and for analysing the reports within its competence (e.g., inherent reports – i.e., reports within the scope, substantiated and verifiable) and – alternatively – for validating the proposed modalities of investigation or jointly defining them.

Finally, the Whistleblowing Team shall define, if necessary, the communication flows (if any) towards the Administration and Control Bodies (see paragraph "Handling of Special Cases and Potential Conflicts of Interest" of this Policy). Within the framework of these flows, the Whistleblowing Team shall also inform, according to their competence the other actors of the Internal Control and Risk Management System (e.g. the Supervisory Body and the Anti-Bribery Officer).

Finally, the Whistleblowing Team shall have the power to:

- close reports relating to facts already known and fully ascertained by the Whistleblowing Team without the report adding or allowing the addition of further elements or aspects to what is already known (so-called "Outdated Reports");
- refrain from processing reports relating to (i) facts in relation to which investigations are known to be underway by Public Authorities (e.g., judicial authorities and administrative bodies) and (ii) facts that are already known and are the subject of pending litigation between ADR/Subsidiaries and Third Parties or Employees (so-called "Reports on Facts Under Investigation/Ongoing Lawsuits").

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| <p>4.3 Ascertainment of reports</p> | <p>The aim of this stage is to carry out in-depth investigations, in accordance with the procedures defined by the Whistleblowing Team, in order to objectively ascertain whether or not the reported facts are well-founded.</p> <p>To this end, the Coordinator shall take an active part in the process, with the support of the competent corporate functions and/or external consultants depending on the subject of the report. The Coordinator shall report on the results of the investigation to the Whistleblowing Team, which may request any necessary additions and shall assess, on a case-by-case basis and on the basis of the evidence progressively brought to its attention, whether it is appropriate to activate communication flows towards the organisation, the Administration and Control Bodies and the other parties involved in the Internal Control and Risk Management System (i.e. Supervisory Body, the Anti-Bribery Officer and Tax Risk officer).</p> <p>The Whistleblowing Team shall deliver the reports to the competent Supervisory Body (i.e. the Supervisory Body of ADR S.p.A. or its Subsidiary) so that it can assess their possible relevance pursuant to Model 231. The competent Supervisory Body then proceeds to autonomously deal with the relevant report pursuant to Model 231 according to its internal regulations.</p> <p>Finally, the Coordinator, also through the Whistleblowing Team Technical Secretariat, has the task of providing feedback on the action taken or intended to be taken to the Whistleblower within three months from the date of the acknowledgement of receipt of the report.</p> |
| <p>4.4 Closing of reports</p> | <p>The Whistleblowing Team shall examine the results of the investigation phase, and:</p> <ul style="list-style-type: none"> ▪ should the content of the report be confirmed, refer the definition of any necessary measures to the competent functions on a subject-to-subject and in accordance with the existing proxy system; ▪ should weak areas and/or points for improvement in the Internal Control and Risk Management System emerge during the audit (regardless of the outcome), request the implementation of the necessary improvement actions; the Internal Audit shall support the competent Management in defining the action plans and monitor (as part of the follow up process) their implementation within the agreed timeframe. <p>When applicable, Whistleblowing Team shall submit to the Supervisory Body and to the Anti-Bribery Officer of ADR or its Subsidiary (to the extent of their respective competences) the results of the preliminary investigation before its final closure, in order to identify any further needs for investigation.</p> <p>Finally, the Whistleblowing Team shall proceed to file the report, classifying it as “Founded” or “Not Founded” and “With Actions” or “Without Actions”, whether for improving the Internal Control System or otherwise (e.g., reporting to the judicial authorities).</p> <p>It shall then activate, on a half-yearly basis, the reporting flows towards:</p> <ul style="list-style-type: none"> ▪ ADR Administration and Control Bodies and, for competence areas, towards the other parties involved in the Internal Control and Risk management System (i.e. the Supervisory Body, the Anti-Bribery Officer and the Tax Risk Officer); ▪ ADR Subsidiaries Administration and Control Bodies that have appointed the Whistleblowing Team, as an external party, to handle the whistleblowing channels. <p>Specifically, the reporting includes: i) the total number of reports received by kind of violation; ii) details on higher relevance reports; iii) any whistleblowing framework improvement action (e.g. IT systems, processes and procedures) resulting from periodic assessment and with a perspective of continuous improvement.</p> <p>The documentation (both in paper and electronic form, including the file dedicated to the individual reports and containing the documentation relating to the preliminary verification and assessment activities and their results) prepared and managed as part of the process in question shall be kept by the Technical Secretariat, in compliance with the appropriate levels of security in relation to the risk of accidental or illegal destruction, loss, modification, disclosure and access to information by unauthorised persons.</p> |

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| 4.5 Handling of special cases and potential conflicts of interest | <p>Should the reported facts concern:</p> <ul style="list-style-type: none"> ▪ one or more members of the Whistleblowing Team, the Whistleblowing team shall inform the Chairman of the Risk & Control Committee⁸ without delay, who, after hearing the opinion of the Committee, shall assess whether to entrust the investigation to the Whistleblowing Team with the exclusion of the person(s) involved or to manage it directly, in compliance with this Policy, also with the support of an external consultant; ▪ one or more members of the Board of Directors of ADR and/or of the Control and/or Supervisory Bodies, the Whistleblowing Team shall promptly inform the Chairman of ADR Board of Directors and/or the Chairman of the Board of Statutory Auditors and/or the Chairman of the Supervisory Body (where applicable)⁹ to carry out the necessary preliminary investigation aimed at assessing the merits of the report, also with the support of the competent corporate functions and/or external consultants. <p>In the event of further and different situations where a member of the Whistleblowing Team has a conflict of interest, it shall be their responsibility to declare the conflict and refrain from whistleblowing management.</p> |
| 4.6 Communication, training and awareness-raising | <p>The Whistleblowing Team is responsible for promoting, over time, the necessary awareness-raising and training actions for the corporate population and other policy addressees on the whistleblowing process. Corporate population is also trained on the usefulness of the process, the supporting tools and the guarantees and protections for Reporting and Reported subjects.</p> |
| 4.7 Whistleblowing team meetings | <p>The Whistleblowing Team is readily called to meet at the request of the Coordinator each time a report is received which is deemed to be of particular relevance in terms of reputational and operational risk, and which can be substantiated and verified, in order to define the investigation methods, request any further analysis, declare it closed and define the necessary communication flows. It is also called upon to analyse Reports whose relevance, competence and verifiability are doubtful.</p> <p>The Whistleblowing Team, even in the absence of any allegations, meets at least once every six months, to assess the adequacy of the process in question and to promote to the Board of Directors any improvements, including the necessary information and training actions addressed to the corporate population.</p> <p>The Whistleblowing Team is considered validly constituted when all its members are present, in person as well as in virtual meetings (e.g.: in video / call conference). In the event of unavailability, the necessary substitutions will be assessed, also on a temporary basis.</p> <p>The Secretary draws up meeting minutes, which are shared - with a "confidential" or similar classification in relation to internal practices and procedures - among the team members.</p> |

⁸ And the Chairman of the Supervisory Body, where applicable, for matters falling within its remit.

⁹ Except in cases that directly concern them. In that case, the report will be forwarded to the most senior member of the respective body for handling.

5. Guarantees and protections

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| 5.1 | Confidentiality guarantee | <p>All ADR Group's staff involved in the handling of reports in any capacity whatsoever shall guarantee confidentiality regarding the existence and content of the report, as well as the identity of the Reporting subjects (where disclosed) and the Reported subjects, according to applicable regulations.</p> <p>In carrying out their reporting management activities, the members of the Whistleblowing team are not subject to hierarchical powers and controls and have specific confidentiality obligations, also towards colleagues and hierarchical superiors.</p> <p>Any communication concerning the existence and content of the report, as well as the identity of the Reporting subjects (where disclosed) and the Reported subjects, shall strictly follow the "need to know" criterion.</p> <p>To this end, the Whistleblowing Team, through the Team Technical Secretariat, shall record in the special Whistleblowing Register the list of persons to whom it has become necessary to provide communications regarding each report and the information provided (e.g., the existence and/or content of the report, the identity of the Reporting and/or Reported subjects, the outcome of the investigations carried out, etc.).</p> |
| 5.2 | Reporting subject protection | <p>ADR shall guarantee the confidentiality of the Reporting subject's identity from the time the report is received, in accordance with the applicable law. The protection also applies before the establishment of the legal relationship (if the information was acquired during the recruitment process or in the pre-contractual phase), during the trial period or after the termination of the employment relationship (if the information was obtained in the course of the employment relationship).</p> |
| 5.2.1. | Confidentiality on the reporting subject's identity | <p>For reports transmitted via the IT platform referred to in §4.1 above, the confidentiality of the identity of the Reporting subject (as well as the content of the report) shall be protected in the following ways:</p> <ul style="list-style-type: none">▪ the platform shall be provided by a specialist third party independent from the ADR Group;▪ the platform shall adopt a "no-log" procedure, i.e., it shall not collect in any way, either directly or indirectly, information on how the connection is made (e.g. server, IP address, mac address), thereby guaranteeing complete anonymity. In particular, this means that the company's IT systems shall be unable to identify the access point to the portal (IP address), even if access is made from a computer connected to the company network;▪ the platform shall guarantee high standards of security, employing advanced encryption algorithms and other methods to prevent unauthorised access;▪ no registration shall be required for Internet access to ADR's website (available to anyone, including Employees), and Reporting subjects may remain anonymous. If they wish, Reporting subjects may otherwise provide their name and express consent for their details to be communicated to the Whistleblowing Team. <p>For reports transmitted via paper and electronic mail channels, the confidentiality of the Reporting subject's identity (as well as the content of the report) shall be protected in the following ways:</p> <ul style="list-style-type: none">▪ paper mail addressed to the Whistleblowing Team shall be delivered in a sealed envelope (as delivered by the postal service) to the Whistleblowing Team Secretariat;▪ only members of the Whistleblowing Team and the Technical Secretariat shall have access to the e-mail box; the administrator of the competent company e-mail system may only access the reference box for technical reasons, subject to a justified case-by-case request to be forwarded in writing to the Whistleblowing Team Coordinator, and access shall only be granted upon prior written authorisation (from the Whistleblowing Team Coordinator). <p>In all cases in which the name of the Reporting subject has been communicated, in the processing of reports by the Whistleblowing Team, the name of the Reporting subject shall be separated from the content of the report and replaced with the alphanumeric code assigned to them at the time of the first entry in the special Whistleblowing Register kept at the Technical Secretariat.</p> |

ADR Group guarantees the use of appropriate technological and organisational measures to ensure that the processing of personal data is carried out in a compliant manner with the regulations dictated by the applicable privacy legislation.

If the dispute concerning the report is founded, in whole or in part, and knowledge of the identity of the Whistleblower is necessary for the defence of the accused, the report will only be used for the purposes of disciplinary proceedings if the Whistleblower has expressly consented to the disclosure of his identity. The Whistleblower shall be notified in a written communication of the reasons for the disclosure of the confidential data, in accordance with the applicable legislation.

The protective measures are also extended to the other subjects covered by the regulations in force¹⁰.

5.2.2. Protection of reporting subjects from retaliation or discrimination

In compliance with the law, ADR Group shall prohibit and sanction any form of retaliation¹¹ or discrimination against anyone making a report (or anyone who has cooperated in ascertaining the facts reported), regardless of whether or not the report turns out to be well-founded.

In particular, should the bona-fide Reporting subject be an Employee, the Whistleblowing Team (availing itself of the relevant corporate functions) will ensure that the Employee's working life is maintained for a period of 2 years from the date of the report, in the absence of any discriminatory action or other forms of retaliation following the report.

5.3 Reported party protection

ADR shall require everyone to cooperate in maintaining a corporate environment of mutual respect and shall prohibit any conduct that may harm the dignity, honour and reputation of any individual. The guarantees of confidentiality established by the Policy shall also protect Reported subjects.

Reported subjects shall not be subject to disciplinary sanctions in the absence of objective evidence of the reported violation, i.e., without investigating the reported facts and notifying the relevant charges in accordance with the legal and/or contractual procedures.

The Reported subjects may not request to know the name of the Reporting subject, except in the cases expressly provided for by law.

For the purpose of further protecting the Reported subjects, the actions and powers allowed to them by law remain unaffected.

¹⁰ Protection measures also extended to:

a) facilitators; b) persons in the same work environment as the whistleblower/complainant to the judicial or accounting authority/public disclosure and who are linked to them by a stable affective or family relationship up to the fourth degree; c) co-workers of the whistleblower/person who made the complaint to the judicial or accounting authority/public disclosure, who work in the same work environment as the whistleblower/public disclosure and who have a habitual and current relationship with that person (Art. 3, paragraph 5 Legislative Decree no. 24 of 10/03/2023).

¹¹ Article 17(4) of Legislative Decree no. 24 of 10/03/2023

gives examples of cases that could constitute retaliation: (a) dismissal, suspension or equivalent measures; (b) downgrading or non-promotion; (c) change of duties, change of place of work, reduction of salary, change of working hours; (d) suspension of training or any restriction on access to it; (e) negative merit notes or references f) the adoption of disciplinary measures or any other sanction, including financial penalties; g) coercion, intimidation, harassment or ostracism; h) discrimination or otherwise unfavourable treatment; i) failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the employee had a legitimate expectation of such conversion; (l) the non-renewal or early termination of a fixed-term employment contract;

(m) damage, including to a person's reputation, in particular on social media, or economic or financial loss, including loss of economic opportunities and loss of income (n) placement on improper lists on the basis of a formal or informal sector or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future; (o) early termination or cancellation of a contract for the supply of goods or services; (p) cancellation of a licence or permit; (q) a request to undergo psychiatric or medical examinations.

6. Sanctioning system

ADR Group shall provide for and impose disciplinary sanctions (where applicable) on its Employees against:

- those who are responsible for any act of retaliation or discrimination or in any case of unlawful prejudice, either direct or indirect, against the Reporting subject (or anyone who has cooperated in the investigation of the facts which are the subject of a report) for reasons connected, either directly or indirectly, with the report;
- the Reported subject, or other persons involved in the alleged facts, for the responsibilities ascertained;
- anyone who breaches the confidentiality obligations referred to in the Policy;
- employees, as provided for by law, who have made an unfounded report with malicious intent or gross negligence.

Disciplinary measures shall be proportionate to the extent and seriousness of the unlawful conduct ascertained, and may go as far as termination of employment for the most serious cases.

With regard to Third Parties (e.g., partners, suppliers, consultants, agents), the remedies and actions provided for by law shall apply, in addition to the contractual clauses on compliance with the Code of Ethics and any other applicable internal regulations.

7. Personal data protection

In accordance with the minimisation principle set out in Article 5 of (EU) Regulation No. 2016/679 (“GDPR”), only personal data that is relevant and necessary for the purposes of the Policy may be processed. Therefore, all personal data (of any natural person) contained in the report or otherwise collected during the investigation phase that is not necessary shall be deleted or anonymised.

The Privacy Information Notice¹² contains general information on the processing of personal data within the scope of the whistleblowing management. Documents and information relating to reports shall be retained for as long as necessary for the processing of the report and in any case no longer than the time limits set out in the aforementioned notice, without prejudice to any legal obligations or the need for protection in the event of a dispute.

On the occasion of each report, the Reported subject and other persons involved in the report may not immediately receive a specific privacy notice regarding the processing of their data, in the presence of a risk that providing such a notice would compromise the ability to effectively verify the validity of the report or to collect the necessary feedback.

¹² Published on the website at the following link
<https://www.adr.it/web/aeroporti-di-roma-en/whistleblowing-gruppo-adr>
and on the company intranet.

