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## WHISTLEBLOWING PROCEDURE

In force since July 15, 2023.

### INTRODUCTION & PURPOSE

Antares Vision Group invites all its employees, collaborators, business partners and, more generally, stakeholders, to inform the Group about any Infringement (as defined from now on) that they should witness or learn about.

For such aim, Antares Vision Group established a reporting channel to allow Whistleblowers (as defined from now on) to Report in a confidential and effective way.

So, Antares Vision Group created a specific platform dedicated to Whistleblowing (as defined from now on) aimed at guaranteeing the Whistleblower's confidentiality (the "**Whistleblowing Channel**").

Such platform can be reached from the <https://www.antaresvisiongroup.com/it/whistleblowing/> address and allows to send accurate Reports without any need to create an account. After the Reporting is complete, the system will generate a 16-digit code that the Whistleblower may use to verify any answers received concerning the Reporting made, or to make addition to what was declared previously.

Antares Vision Group has chosen Attorney Francesco Menini (the "**Whistleblowing Manager**") as the qualified and independent external subject for the first management of all the reports sent by any company in the Antares Vision Group, in compliance with the existing laws.

### 1. GLOSSARY

The words written with a capital letter in the present procedure have the following meaning, both when used in the singular and plural forms.

**Antares Vision:** it indicates Antares Vision S.p.A., with its registered office in Via del Ferro 16, Travagliato (BS), registered at no. 02890871201 on the register of enterprises of Brescia.

**Antares Vision Group:** it indicates Antares Vision and its Subsidiaries.

**Facilitator:** it indicates the person assisting a Whistleblower in the Whistleblowing process, which identity is protected alongside the identity of the Whistleblower.

**Feedback:** it indicates the Communication made to the Whistleblower on how the Whistleblowing was or will be managed.

**Information on Infringements:** it indicates information or well-founded suspicions on Infringements committed, or that might have been committed, within the Antares Vision Group.

**Infringement:** it indicates the actions or behaviors contrasting with the internal Antares Vision policies and with the law, as better explained on point 5.

**Person Concerned:** it indicates the person mentioned in the Whistleblowing as the person to which the Infringement was attributed or involved in the Infringement on any level.

**Recipients:** it has the meaning given to it on point **Error! Reference source not found.**

**Report or Reporting:** it indicates the written or spoken communication of information on Infringements.

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**Retaliation:** it indicates any behavior, action, or omission, even attempted or threatened, done on account of the Whistleblowing, that causes or might cause the Whistleblower, unfair damage, either directly or indirectly.

**Subsidiaries:** it indicates any company in which Antares Vision has a controlling stake, as stated in the consolidated balance sheet.

**Whistleblower:** the word has the meaning given to it on point **Error! Reference source not found..**

**Whistleblowing:** it indicates the process of submitting a Report of unlawful behaviors entailing Infringements pursuant to Law 24/2023, as described on point 3.

**Whistleblowing Channel:** it has the meaning given to it in the paragraph called "Introduction & Purpose"

**Whistleblowing Manager:** it has the meaning given to it in the paragraph called "Introduction & Purpose".

**Work Context:** it indicates the work-related or professional activities, either past or present, through which a person acquires information about Infringements, independently from the nature of such activities.

## 2. APPLICATION FIELDS AND RECIPIENTS

This procedure applies to Antares Vision and to its Subsidiaries.

Each company part of the Antares Vision Group must adopt this procedure, in conformity with its *corporate governance* system.

The present procedure is addressed to all the members of the corporate bodies, to the employees, the volunteers and interns, the directors, the cooperators, the service providers, the consultants, the stakeholders, the people involved in administration, direction, control, surveillance, or representation and, in general, to anybody that has a working relationship with Antares Vision Group, no matter what the juridical nature of the relationship is. (the "**Recipients**").

Antares Vision Group commits to promoting the knowledge of this procedure.

## 3. WHAT IS WHISTLEBLOWING?

**Whistleblowing** is a way to notify Infringements as better defined in point **Error! Reference source not found..**

The Report must contain information on specific Infringement, based on concrete facts, well-documented and consistent.

## 4. WHAT IS POSSIBLE TO REPORT AND WHAT REGULATED THIS PROCEDURE?

This procedure regulates the Reporting of Infringements encountered by the Whistleblower within Antares Vision Group.

Besides the procedure regulates how Antares Vision Group receives, analyzes and manages the Reports, in any case respecting the Whistleblower's privacy.

The Reports cannot be made anonymously, except in case the Whistleblower notifies Infringements related to a company policy allowing anonymous Whistleblowing.

Any other form of anonymous Reporting will not be taken into consideration and will be archived.

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## 5. INFRINGEMENT

### 5.1. SUBJECT OF INFRINGEMENT

The “**Infringement**” are all the behaviors, acts and omissions damaging public interest or Antares Vision Group’s integrity, and that consist of:

1. Unlawful conducts relevant under Italian Legislative Decree 231/2001;
2. Offences falling within the scope of European Union or national laws relating to the following sectors:
  - a. Public tenders,
  - b. Financial services, products and markets, for the prevention of money laundering and terrorism funding.
  - c. Safety and conformity of the products,
  - d. Safety of transportation,
  - e. Environmental protection,
  - f. Nuclear safety and protection from radiations,
  - g. Safety of food and animal feed, and animal health/well-being.
  - h. Public health, consumer protection, protection of personal data and privacy, safety of networks and computer systems.
3. Acts or omissions damaging the financial interests of the European Union;
4. Acts or omissions concerning the domestic market, including the violations of the European Union competition and State aid rules.

The Infringements mentioned above on points 2, 3, 4, can be Reported only in relation to companies with more than 50 employees on average or lying in the field of the application of European Union acts concerning financial services, products and markets, prevention of money laundering and terrorism funding, safety of transportation and environmental protection.

### 5.2. OTHER REPORTING ALLOWED

In addition to the Infringements mentioned in point **Error! Reference source not found.**, Antares Vision Group promotes Whistleblowing on:

1. Infringements of the following policies:
  - a. Diversity, equity and inclusion of Antares Vision Group;
  - b. Human rights policy of Antares Vision Group;
  - c. Anti-corruption policy of Antares Vision Group;
2. Internal frauds, even though they only damage Antares Vision Group.

For such aims, Antares Vision Group recognizes the same protection to the Whistleblower using the Whistleblowing channel to notify of such conduct.

### 5.3. INFRINGEMENTS NOT SUBJECT TO WHISTLEBLOWING

The following cannot be the subject of Whistleblowing:

- Information on unlawful behaviors **already disciplined by the European Union or national laws**, or by the national acts listed in part II of the of the Annex to the Directive (EU) 2019/1937;
- Information on unlawful behaviors relating to **national security, tenders related to the defense or national security matters**, unless such matters are already covered in the European Union secondary laws.

## 6. WHISTLEBLOWER

The present procedure regulates the modalities to be followed by the natural person who makes a Report of **Infringements acquired in the field of one’s own Work Context** (the “**Whistleblower**”) must comply with.

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The Whistleblowing can be done by all the Recipients as well as by the customers.

The protection from Retaliations applies to the Whistleblowers not only if the Report takes place in the Work Context but also after the cessation of the relationship with the company.

Some examples of forbidden Retaliations are:

- Firing or suspending the worker, or equivalent measures;
- Demoting or failing to promote the worker;
- Changing the worker's function, workplace, cutting the worker's pay or modifying the worker's working hours;
- The suspension of the training or any restriction of access to it;
- Negative notes of merit or references;
- The adoption of disciplinary measures or any other penalty, even financial;
- Coercion, intimidation, harassment or ostracism;
- Discrimination or, in any case, unfavorable treatment;
- The failed conversion of a temporary work contract into an open-ended contract, where the worker has a legitimate expectation in this conversion;
- The failed renewal, or the anticipated withdrawal of a temporary contract;
- The damages, even to the person's reputation, in particular on social media; or economic and financial prejudices, including the loss of economic opportunities and monetary gains;
- The addition to improper lists, based on a sectoral or industrial agreement (either formal or in formal) that can entail the impossibility for the person to find a future occupation in the field;
- The anticipated conclusion or the cancellation of a contract for the provision of goods or services;
- The cancellation of a license or a permit;
- The request to undergo a medical or psychiatric examination.

The privacy and protection from Retaliation is also guaranteed:

- To the Facilitator;
- To the people in the same Work Context as the Whistleblower, bound to this person by personal ties or by a relation up to the fourth degree;
- To the Whistleblower's work colleagues, operating in the same Work Context and having a current and habitual relationship with this person;
- To the entities owned by the Whistleblower, or those for which the people themselves work, as well as the entities operating in the same Work Context as these people.

## **7. REPORTING**

### **7.1. CHARACTERISTICS OF THE WHISTLEBLOWING CHANNEL**

The Whistleblowing Channel is configured to guarantee the peculiarities and the independence of the ordinary reporting lines.

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The Whistleblowing systems entail alternative channels made available to Whistleblowers, in order to ensure that:

- The Whistleblowing Manager is not hierarchically and/or functionally subordinate to the Person Involved.
- The Whistleblower is not itself the alleged perpetrator of the Infringement and
- The Whistleblower does not have any stake related to the Whistleblowing such to compromise its neutrality and independence of judgement.

The Whistleblowing Manager does not participate in the judgements, if any, that are the prerogative of the competent company functions or bodies.

## 7.2. ELEMENTS OF THE WHISTLEBLOWING

The Whistleblower has to provide all useful and necessary elements to allow the Whistleblowing Manager to conduct a preliminary investigation, to proceed to the necessary verifications and checks, and to evaluate the admissibility and validity of the Whistleblowing.

In order to make a Report, it is not necessary for the Whistleblower to have any proof of the Infringement; however, the Whistleblower must have sufficiently detailed information, based on concrete, consistent and accurate facts that may make Whistleblowing reasonable.

In any case, the Whistleblowing must contain the following elements:

- The identity of the Whistleblower, with an indication of the position held and/or the function/activity carried out in Antares Vision Group;
- A clear and complete description of facts, as accurate and consistent as possible, which constitute or may constitute a relevant Infringement;
- If known, the time and place circumstances in which the facts that are the subject of the Whistleblowing were committed, the modalities with which the Whistleblower became aware of the Infringement and any other people that were present when the Infringement was committed;
- If known, the full name or other elements allowing to identify of the subject(s) that are liable for the facts that are notified in the Report (for instance their qualification and area where the person performs their activity);
- The indication of other subjects, if any, that may refer on the facts that are the subject of the Report;
- The indication of any documents that may confirm the validity of the facts that are the subject of the Report;
- Any other information or document that may be useful to understand the facts that are the subject of the Report.

## 7.3. TYPES OF REPORT

### Incomplete Report

If the Report is not detailed, and it doesn't allow to individuate sufficient elements to start a preliminary investigation (for instance, if it lacks any wrongful act, any reference period, any cause and aim of the wrongful act, any people/roles involved etc.), the Whistleblowing Manager will take care to ask for integrations to the Whistleblower, in order to follow-up on the Report.

### Non-relevant Report

If the Whistleblowing is referred to external subjects or to facts, acts or behaviors that are not a matter of Report according to applicable laws, the Whistleblowing Manager will classify this report as non-relevant.

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The Whistleblowing Manager, in case the Report is deemed concrete and consistent, although not relevant to the aims of this procedure, can forward the Report to the attention of the competent internal function, while always maintaining the Whistleblower's identity confidential.

In case the Whistleblower's protection cannot be guaranteed, the Report will be forwarded only on explicit consent of the Whistleblower.

#### **Relevant, but non-processable Report**

If the Report is pertinent to the field of application of this procedure but, at the end of the preliminary examination stage and of the request of further information (if any), it was not possible to request sufficient information and elements concerning the subject of the Report in order to investigate further, the Whistleblowing Manager will classify this Report as non-processable and will proceed to archive it.

#### **Forbidden Report**

In case the Whistleblowing Manager deems the Report (i) to have purely defamatory or slandering aims (ii) to be exclusively pertaining to aspects of someone's private life, with no link, either direct or indirect with the Work Context, (iii), be of a discriminatory nature in regard to sexual, religious political orientation, or to the ethnic or racial origin of the Person Involved or (iv) to be only aimed at harming the Person Involved, the Whistleblowing Manager will communicate this circumstance to the competent function for the possible start of a disciplinary proceeding and the evaluation of the communication of the Whistleblowing to the Person Involved, to allow him/her to exercise his/her right to defense.

In case the Competent Function decides not to notify the Person Involved, the Report received will be archived.

The involvement of other functions may be required even later, in case the defamatory, slandering, or discriminatory nature should emerge only during the later investigation phase.

In any case, using offensive expressions is forbidden.

Such conduct, alongside sending Reports either forbidden or made with intent or gross negligence, or that can be deemed evidently unfounded, will be punished according to the disciplinary system adopted.

Penalties are provided in case of Reports made with intent or gross negligence, or that should turn out false, groundless, defamatory, or anyway only aimed at damaging Antares Vision Group, the Person Involved or other subjects concerned by the Report.

**In case of sending of forbidden Report, the privacy of the Whistleblower's identity as well as the other measures for the Whistleblower's protection provided for by Antares Vision Group will not be guaranteed.**

### **7.4. REPORT SENT TO A CHANNEL OTHER THAN THE WHISTLEBLOWING CHANNEL**

The confidentiality of the Whistleblower is protected even if the Whistleblowing is performed with means other than the Whistleblowing Channel, created in conformity with the present procedure, or it is received by staff other than the Whistleblowing Manager to whom, anyway, all reports must be forwarded without delay. In case the internal Report is sent to a subject other than the Whistleblowing Manager, the Report must be forwarded to the Whistleblowing Manager within **7 (seven) days** from its reception.

The Whistleblower will be informed of the forwarding of the Report to the Whistleblowing Manager.

Other channels are the notification to:

- The hierarchical superior.
- The Supervisory Body of the company with which the Whistleblower have a work relationship, if this body was appointed, through an e-mail to the dedicated address, or through a letter;

**It should be noted, however, that in the case of notifications to the hierarchical superior, such notifications cannot be considered as a Report within the meaning of this procedure and, therefore, confidentiality may not be guaranteed.**



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## 7.5. REPORTING MADE IN PERSON

In case a Report is made in person, directly to the Whistleblowing Manager, the Whistleblowing Manager **can open** the Whistleblowing form on behalf of the Whistleblower, **adding** all the information required to follow up on the Report itself.

## 7.6. INTERNAL AND EXTERNAL REPORTING

### Internal Reporting

In the field of the management of the Whistleblowing Channel, the Whistleblowing Manager, to which the management of the Reports is committed, performs the following activities:

- The issue of a reception notification of the Whistleblowing in 7 (seven) days from the reception, alerting the Whistleblower;
- Maintaining communications with the Whistleblower and asking, if necessary, for supplementary information;
- Following-up on the Reports received, involving the internal apical functions and those competent that appear to be best qualified to investigate the Report in the first instance. If one of these functions to be involved is the subject of the Report, the Whistleblowing Manager will avoid sharing the Report with that person. Even during this phase, the confidentiality of the Whistleblower will be guaranteed;
- Providing Feedback to the Whistleblower regarding its Report within 3 (three) months from the date of reception. Or, lacking this, by 3 (three) months from the expiry 7 (seven)-days deadline from the submission of the Report, even when the investigations on the Report are still in progress.

### External Reporting

Besides the Internal Reporting, the Whistleblower can also report externally to ANAC if:

- An internal Reporting has already been made by the Whistleblower, but has received no Feedback;
- The Whistleblower has well-founded reasons to think that, if he/she did an internal Reporting, it would not be effectively followed up, or the Whistleblowing would entail a risk of Retaliation;
- The Whistleblower has well-founded reasons to think that the Infringement may constitute a clear or imminent danger for the public interest.

Therefore, in the cases provided for by Italian Legislative Decree No. 24/2023 and upon the existence of the lawful requirements, it will be possible to make an external reporting, as regulated on this portal: <https://www.anticorruzione.it/-/whistleblowing>.

## 8. MANAGEMENT OF REPORT

### 8.1. RECEPTION OF REPORT

Upon reception of a Report, no matter what channel is used, the Whistleblowing Manager will take care of assigning a progressive identification number that will allow its univocal identification.

### 8.2. PRELIMINARY ANALYSIS AND EVALUATION

The Whistleblowing Manager takes care in a timely manner to take charge and analyze the Report received, for the sake of its preliminary evaluation, involving the internal apical functions and those competent for the reference field, as indicated in point **Error! Reference source not found.**

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Following this analysis, the Whistleblowing Manager will take care of classifying the Report in one of the categories indicated in point **Error! Reference source not found..**

### 8.3. INVESTIGATIONS

At the end of the preliminary evaluation stage, if the Report received is classified as “relevant and processable”, the Whistleblowing Manager will proceed to start the internal verification and investigations in order to collect more detailed information to verify the consistency of the facts Reported and to collect adequate evidence.

In the context of the preliminary activity, the Whistleblowing Manager will rely on the support of company structures or internal company functions with adequate qualifications and/or by resorting on external consultants.

In such circumstances, the subjects involved in the preliminary investigations are also obliged to comply with this procedure.

### 8.4. REPORT ON THE VERIFICATION ACTIVITY

The verification phase ends with the drafting of a minute to formalize the reference context of the Report, of the verification activities executed, of the modalities followed and of the related results obtained.

Besides, the minute will propose the actions to be undertaken in relation to every relevant fact emerged.

### 8.5. CONCLUSIONS

At the end of the investigations, if the Whistleblowing Manager does not find that the Infringement described in the Report is justified, or in any case that such conduct does not constitute an Infringement as defined in this procedure, he shall close the Report.

If, on the other hand, he finds that the Report is well-founded and concerns some Company employees, he shall promptly send the final report of the investigation to the relevant function for the assessment of any disciplinary measure to be taken and/or for any communication to the relevant Authorities.

At the same time, the Whistleblowing Manager will consider informing the Administrative Body of Antares Vision as well as the Antares Vision Group company involved.

However, the Whistleblowing Manager will report on the Reports received, taken, dismissed, closed, and any sanctions issued on a six-monthly basis to the Audit and Risk Internal Board.

## 9. PRIVACY AND PROHIBITION TO RETALIATE

No direct or indirect Retaliation or discrimination may result if the Whistleblower has made a Report in good faith.

Moreover, sanctions are provided for those who violate the measures to protect the Whistleblower.

The confidentiality of the Whistleblower is also guaranteed:

- to any other information or element of the Report from the disclosure of which the identity of the Whistleblower could be deduced, directly or indirectly.
- in case of Reports made orally through telephone calls, voice messages, or through a direct meeting with the Whistleblowing Manager.

The Reported company may also take appropriate action in court.

The confidentiality of the Whistleblower is guaranteed provided that:

- at the time of the Report, the Whistleblower has reasonable grounds to believe that the Information on Infringements is true, and that this truthfulness is discernible (also in the light of the concrete case and the data available at the time of the Report);
- the Report was made in accordance with the provisions of this procedure.

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## 9.1. JURIDICAL PROTECTION OF THE WHISTLEBLOWER

The confidentiality of the Whistleblower is also guaranteed in the courts, and namely:

- in **criminal proceedings**, the identity of the Whistleblower is covered by secrecy in the manner and within the limits provided for in Article 329 of the Code of Criminal Procedure.
- in proceedings before the **Italian "Corte dei conti"**, the identity of the Whistleblower cannot be disclosed until the investigation phase is closed.
- in **disciplinary proceedings**, the identity of the Whistleblower cannot be disclosed, if the allegation of the disciplinary charge is based on investigations other than the Whistleblowing, even if consequent to the Whistleblowing. If the contestation is based, in whole or in part, on the Report, and it is essential for the wrongdoer's defence to know the identity of the Whistleblower, the Report shall be used for the disciplinary proceeding only with the express consent of the Whistleblower.

## 9.2. EXPLICIT CONSENT OF THE WHISTLEBLOWER

To reveal the identity of the Whistleblower, there must be:

- written communication by the Whistleblowing Manager of the reasons why it is necessary to reveal the identity of the Whistleblower, and
- the explicit consent of the Whistleblower.

The **first hypothesis** occurs when, in the context of a disciplinary proceeding against the alleged perpetrator of the reported conduct, the identity of the Whistleblower is crucial to the defence of the person charged with the disciplinary offence.

In such a case, in addition to the prior consent of the Whistleblower, the legislation also requires that he is informed, in advance and in writing, of the reasons justifying the disclosure of his identity.

The **second hypothesis** occurs, instead, where disclosure of the identity of the Whistleblower is also indispensable for the defence of the Person Concerned.

Also in this case, to disclose the Whistleblower's identity, it is necessary to obtain the Whistleblower's consent beforehand and to notify him in writing of the reasons for the need to disclose his identity.

Therefore, it is fundamental that the Whistleblower monitors the status of the Report, to ensure a dialogue with the Whistleblowing Manager.

## 10. COMMUNICATION AND TRAINING

Antares Vision Group promotes awareness of this procedure.

For this purpose, this procedure shall be made available to all the Recipients according to the modalities defined by Antares Vision Group.

This procedure is also published, in Italian and in English, on the Antares Vision Group's website.

Any doubts concerning the application of this procedure may be addressed to the Whistleblowing Manager or to the Supervisory Body of Antares Vision.

Antares Vision Group is committed to developing appropriate training and awareness programmes relating to this procedure, with the aim of strengthening its compliance culture and increasing understanding and awareness of the importance of Whistleblowing systems.

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## **11. DISCIPLINARY MEASURES**

Failure to comply with this procedure may lead to the application of disciplinary measures against the employee, in accordance with the applicable local law, with any legal consequences, also with regard to the preservation of the employment relationship and any compensation for damages arising from the violation itself.

Compliance with the provisions of this procedure should be considered an essential part of the contractual obligations taken by any other subject having business relations with Antares Vision Group. Therefore, any violation of the procedure may constitute a breach of contract, with any legal consequences, with regard to the termination of the contract and the consequent compensation for damages arising.

It is Antares Vision Group's responsibility to ensure that Recipients contractually agree to comply with this Policy.

## **12. MONITORING**

Each Company of Antares Vision Group ensures that its internal control system is consistent with the requirements established in the current legislation on Whistleblowing and with the principles contained in this procedure.

## **13. APPROVALS AND AMENDMENTS**

This procedure is approved by the Managing Director of Antares Vision. Any updates to the procedure will be promptly brought to the attention of the companies of Antares Vision Group, for appropriate adoptions by the respective administrative bodies.