

Communication to All the Personnel pursuant to Article 5(e) of Legislative Decree 24/2023

The Legislative Decree of March 10, 2023, No. 24 laying down provisions on the protection of whistleblowers reporting violations of Union law and national regulatory provisions (so-called "Whistleblowing Regulations") implemented (EU Directive) 2019/1937, with the aim of detecting and tackling offenses/violations of national and European Union law, through reports by persons aware of the facts, of unlawful conduct and violations detrimental to the public interest or integrity of the entity.

In compliance with the Whistleblowing Regulations, Thales Alenia Space Italia S.p.A. has defined specific reporting channels and adopted "*The Operational Guidelines for the Submission and Management of Whistleblowing Reports*" ("Whistleblowing Guidelines").

Please find here below the relevant information in order to file reports in compliance with the Whistleblowing Regulations and the provisions of the Whistleblowing Guidelines.

- **Who may report:** the employee (meaning the internal staff of the Company), self-employed worker, voluntary worker and trainee, collaborator, consultant, freelancer who performs his or her work for the Company, worker, or collaborator of the suppliers of goods, services/works; customers and partners of the Company; shareholders and persons performing administrative, management, control, supervisory or representative functions, also *de facto* of the Company.
- **What may be reported:** unlawful conduct relevant under Legislative Decree 231/2001 or violations of the Organization, Management and Control Model and the relevant Code of Ethics of the Company or that of the Group; offenses that fall within the scope of application of European Union or national acts, including national acts implementing European Union acts relating - in particular - to the following areas: public procurement, product safety and compliance, transport safety, environmental protection, public health, privacy and personal data protection, and network and information system security; acts or omissions that harm the financial interests of the European Union; acts, or omissions concerning the internal market, including violations of European Union rules on competition and State aid, as well as on corporate tax; acts or conduct undermining the object or purpose of the provisions set forth in the European Union acts in the above-mentioned areas.
Disputes, claims, or requests connected to personal interests of the whistleblower, pertaining exclusively to his or her employer-employee relationship, or regarding the working relationships with his or her superiors do not fall within the scope of application of the Whistleblowing Regulations.
- **Conditions/Prerequisites for filing a report under the above regulations:** the whistleblower benefits from the protections provided by the Whistleblowing Regulations only if, at the time of the report, he or she has well-founded reasons to believe that the information about the reported violations is true and falls within the scope of what may be reported and has filed the report through the provided channels.
- **Internal reporting channels** are:
 - a) Dedicated **IT Platform** available at the <https://thales.integrityline.org/> link in which the whistleblower must fill in the required fields and follow the procedures specified by the platform.
 - b) **Hardcopy, regular or registered mail** to be sent to the Company's registered office in Via Saccomuro, 24 - 00131 Rome, addressed "*To the Confidential Attention of the Supervisory Board.*" The whistleblower must send the report in two sealed envelopes: the first containing his or her identification data (if necessary, stating the means by which he or she wishes to be contacted)

together with a photocopy of his/her ID (identification document); the second containing the report; both envelopes must be placed in a third envelope where it must be clearly specified that it contains a Whistleblowing report;

c) **In-person Meeting** with the Supervisory Board to be requested by mail following the above directions.

- **Who is the Reports Manager:** the recipient of the reports appointed to analyzing, and investigating and then carrying out the appropriate investigation is the Supervisory Board; this latter may foresee the involvement of other competent individuals or corporate functions in performing the aforementioned activities always in compliance with confidentiality obligations.
- **Procedure for handling the report:** as the recipient of the reports, the Supervisory Board files the report in a special register confidentially, sends an acknowledgement of receipt to the whistleblower within 7 (seven) days from the receipt of the same report; assesses the eligibility of the report by initiating the investigation and, if inadmissible, archives the report by notifying the whistleblower with the relevant reasons; maintains dialog with the whistleblower, requesting additional information from the latter, if necessary;
- **Whistleblower Protection:** the Whistleblowing Regulations protect **the confidentiality** of the whistleblower. Any anonymous report sent through the Company's internal channels in accordance with the procedures set forth in the Guidelines, despite not constituting report under the Whistleblowing Regulations, will be taken into consideration, and handled by the recipient assuming it provides precise and detailed evidence for the review of the disclosed facts. The identity of the whistleblower may not be disclosed to persons other than the recipient and handler of the report, unless the whistleblower has given his or her consent; the protection of confidentiality is extended to the "**facilitator**" (i.e., the physical person who assists the whistleblower in the reporting process and operating in the same work environment) and to the identity of the **persons involved** or **otherwise mentioned** in the report; dismissal, change of job function, adoption of disciplinary measures as well as any act or omission, even attempted or threatened, carried out by the Company for reason of the report (prohibition of retaliatory measures), which causes or may cause unjust damage to the whistleblower are null and void; the above measures also extend to the facilitator or persons mentioned or involved in the report. The adoption of retaliatory measures may be reported to ANAC, which will inform the appropriate bodies for measures within its jurisdiction. The person benefits from the protections provided by the Whistleblowing Regulations if at the time of the report he or she has well-founded reasons to believe that the information relating to the reported violations is true and falls within the scope of what may be reported and has also filed the report in accordance with the required procedures.
- **Reporting to ANAC and public disclosure:** The whistleblower may also file an external report to the **National Anti-Corruption Authority (ANAC)** as indicated on the web page of the same Authority at the following link <https://www.anticorruzione.it/-/whistleblowing> - with reference to the offense and violations described above, with the exception of unlawful conduct relevant under Legislative Decree 231/2001 and violations of the Organization, Management and Control Model and the relevant Code of Ethics of the Company or the Group's Code of Ethics - if one of the following cases occurs:
 - o the internal reporting channel is not active or does not comply with the legal prerequisites;
 - o the report filed through the internal channels has received no follow-up;
 - o the whistleblower has well-founded reasons to believe that if he or she filed an internal report, it would not be effectively followed up or that the same report may be object of retaliation;
 - o the whistleblower has well-founded reasons to believe that the violation may pose an imminent or clear threat to the public interest.

The whistleblower may also make **public disclosure**, in addition to reports to the judicial or audit authorities, if one of the following conditions is met:

- the whistleblower has previously filed an internal and an external report (to ANAC) or has made an external report directly, under the conditions and the required procedures, and there has been no response within the deadline insofar as the foreseen or adopted measures as follow-up of the reports;
 - the whistleblower has well-founded reasons to believe that the violation may constitute an imminent or clear danger to the public interest;
 - the whistleblower has well-founded reasons to believe that the external report may be object of retaliation or may not be effectively followed up due to the specific circumstances of the specific case, such as those where evidence may be withheld or destroyed or where there is a well-founded fear that the recipient of the report may be colluding with or be involved as the perpetrator of the violation.
- **Whistleblower's liability:** a whistleblower who files unfounded reports is liable to disciplinary sanction when it is established, even by a first-degree judgment, that he or she is criminally liable for libel or slander or otherwise for the same offenses committed with the complaint to the judicial or audit Authority, or his or her civil liability, for the same title, in case of fraud or gross negligence.

Personal Data Protection

The processing of personal data related to the management of reports is carried out by Thales Alenia Space Italia S.p.A. as Data Controller, in compliance with European and national regulations on personal data protection, providing appropriate information to the whistleblowers and to the persons involved in the reports, as per the Information Notice hereto enclosed (**Annex "A"**) as well as adopting appropriate measures to protect the rights and freedom of the interested parties.

In addition, the rights under Articles 15 to 22 of (EU) Regulation 2016/679 may be exercised within the limits of the provisions of Article 2-*undecies* of Legislative Decree No. 196/2003.

Personal data that are manifestly not useful for the processing of a specific report shall not be collected or, if accidentally collected, shall be deleted immediately. Reports and related documentation are kept for as long as necessary for the processing of the report and, in any case, no longer than 5 years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set forth in the European and national law on personal data protection.

For further information, please refer to the "*Operational Guidelines for Filing and Handling Whistleblowing Reports*" hereto enclosed (**Annex "B"**).

Roma, 18 marzo 2024