

**Annex "B"**

**OPERATIONAL GUIDELINES FOR FILING AND HANDLING  
WHISTLEBLOWING REPORTS**

**Whereas**

The Operational Guidelines for Filing and Handling Reports (hereinafter also referred to as the "**Whistleblowing Guidelines**") describe the procedures and the internal reporting channel adopted by Thales Alenia Space Italia S.p.A for sending and managing reports of unlawful conduct and relevant violations (whistleblowing) in line with the provisions of Legislative Decree no. 10 March 2023, no. 24, implementing (EU) Directive 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons who report breaches of Union law and laying down provisions regarding the protection of persons who report violations of national laws, which amended Legislative Decree No. 231/2001 on the administrative liability of entities to that effect.

In accordance with the provisions of Article 4 of Legislative Decree No. 24/2023, the Whistleblowing Guidelines have been previously notified to the corporate's representatives/organizations and take into account the information supplied by the Italian National Anticorruption Authority (ANAC) in its "Guidelines on the protection of persons who report violations of Union law and protection of persons who report violations of national regulatory provisions. Procedures for the filing and handling of external reports," approved by Resolution no. 311 on 12 July, 2023.

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## 1 AIM

These Guidelines regulate the process of sending, receiving, analyzing and processing reports on facts and conduct concerning the working environment<sup>1</sup> of Thales Alenia Space Italia S.p.A. (hereinafter also "TASI" or "Company"), deemed to be unlawful conduct or offenses, insofar as they are contrary to relevant national or European regulations, to the ethical principles of the Company and the Group, to the provisions of the Organization, Management and Control Model adopted pursuant to Legislative Decree no. 231/2001 (hereinafter also "Model") and to the internal regulations referred to (company organizational policies and procedures).

The Whistleblowing Guidelines are aimed at implementing Legislative Decree No. 24 of March 10, 2023, implementing (EU) Directive 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons who report breaches of Union law and laying down provisions regarding the protection of persons who report breaches of national laws (hereinafter also "Whistleblowing Legislation"), which amended Legislative Decree No. 231/2001 on the administrative liability of entities to that effect.

The purpose of the Whistleblowing system adopted by the Company is to identify and combat possible offenses/violations and to spread the culture of ethics and lawfulness within the organization, to protect the public interest and the integrity of the Company, as well as to eliminate the factors that may constitute an obstacle to the achievement of said purposes, guaranteeing the Whistleblower's confidentiality (as specified below) with respect to his/her identity in all phases of the management of the report<sup>2</sup> and protection against possible retaliatory actions implemented by the Company as a result of the report itself<sup>3</sup>.

TASI through its internal channels of reporting, in accordance with the regulatory requirements in force, also guarantees the confidentiality of the identity of the person involved<sup>4</sup> and the person in any case mentioned in the report, until the conclusion of the proceedings initiated by reason of the report itself, in compliance with the same guarantees provided in favor of the Reporting Party, as well as the content of the report and the related documentation.

The Company promotes the knowledge and dissemination of the adopted Whistleblowing system among its internal staff<sup>5</sup> and to external stakeholders, so that they are informed and

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<sup>1</sup> Work or professional activities, present or past, carried out within the scope of the legal relationship with the organization, through which, regardless of the nature of such activities, a person acquires information about violations and within the scope of which he/she could risk retaliation in the event of a public report or disclosure or a complaint to the judicial or auditing authority.

<sup>2</sup> The confidentiality of the identity of the "facilitator," i.e., the physical person who helps the Whistleblower in the reporting process, operating within the same work environment and whose assistance must be kept confidential, is also protected.

<sup>3</sup> Protection against retaliatory actions also applies in the case of reporting to ANAC or public disclosure, given the regulatory requirements, as well as reporting to the judicial or auditing authorities.

<sup>4</sup> The natural or legal person who has committed the violation or is otherwise involved in the reported violation.

<sup>5</sup> By providing adequate training courses on the subject for personnel, including those in charge of handling whistleblowing.

aware of the protections and rights associated with a report, as well as the responsibilities provided for Whistleblowing violations.

The Company's disciplinary system as set forth in the Model also applies to those who violate the Whistleblowing Regulations and the Whistleblowing Guidelines.

Information regarding the reporting channels, procedures, and prerequisites for filing reports<sup>6</sup> are displayed and made easily visible in the workplace (specifically: company intranet/bulletin boards, specific communications, newsletters, *ad hoc* information, publication in a dedicated section of the Group website).

## 2 DEFINITION AND SCOPE

### 2.1 Report

Any communication concerning information on violations - including well-founded suspicions regarding violations committed or that, based on concrete evidence, could be committed within the Company, as well as elements relating to conduct aimed at concealing such violations - consisting of acts or omissions harming the public interest or the integrity of the Company, which have become known in the work context, and which consist of:

- a) unlawful conduct relevant under Legislative Decree No. 231/2001 or violations of the Organization, Management and Control Model and the relevant Company and Group Code of Ethics;
- b) as well as, having the Company reached in the last year an average of at least fifty employees with permanent or fixed-term employment contracts<sup>7</sup>:
  - unlawful acts that fall within the scope of European Union or national acts, including national acts implementing European Union<sup>8</sup> acts relating - in particular<sup>9</sup> - 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 (the Annex specifically indicating the rules to which the Whistleblowing Regulations apply can be viewed at

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<sup>6</sup> Also, with reference to external reports to ANAC, where the legal requirements are met.

<sup>7</sup> In these cases, with reference to offenses/violations referred to in letter b), if the conditions of the law are met, the Whistleblower, may also make external reports to ANAC or public disclosures, in addition to reports to the judicial or auditing authorities.

<sup>8</sup> For further details see what is stated and referred to in Article 2, Paragraph 1 (a) (3) of Legislative Decree No. 24/2023.

<sup>9</sup> Given the context in which Thales Alenia Space Italia S.p.A. operates and the activities carried out by the Company.

- acts or omissions that harm the financial interests of the European Union<sup>10</sup>;
- acts or omissions concerning the internal market<sup>11</sup>, including violations of the Union's competition law and State aid regulations as well as in the corporate tax<sup>12</sup> field;
- acts or conduct that frustrate the object or purpose of the provisions set forth in the acts of the European Union in the abovementioned areas.

In any case, the Whistleblowing Regulations do not apply with reference to disputes, claims, or requests related to interests of a personal nature of the Whistleblower, which pertain exclusively to his or her individual working relationships, or rather concern exclusively his or her working relationships with superiors.<sup>13</sup>

Any anonymous<sup>14</sup> reports sent through the Company's internal channels in accordance with the procedures set out in these Guidelines, even if they do not constitute reports under the Whistleblowing Regulations - also for the purposes of the application of the relevant provisions - are taken into consideration and handled by the recipient (specified below) if they provide sufficient and circumstantiated elements for the review of the reported facts. In any case, if the anonymous Whistleblower is subsequently identified, measures of protection against incurred retaliatory acts<sup>15</sup> shall also apply to him or her.

## 2.2 Whistleblower

The individual, internal or external to TASI, who files a report of information on violations acquired within the work context, having a legal relationship with the Company and, therefore, belonging to any category of worker<sup>16</sup> such as:

- permanent employees;

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<sup>10</sup> Referred to in Article 325 of the Treaty on the Functioning of the European Union, specified in relevant secondary legislation.

<sup>11</sup> Referred to in Article 26(2) of the Treaty on the Functioning of the European Union.

<sup>12</sup> Violations concerning the internal market related to acts that violate corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that disregards the object or purpose of the applicable corporate tax law.

<sup>13</sup> As well as: 1) to reports of violations where already mandatorily regulated by European Union or national acts, including national acts implementing European Union acts, in relation to specific sectors (services, products and financial markets and prevention of money laundering and financing of terrorism; transport safety and environmental protection); and 2) to reports of violations in the area of national security, as well as procurement relating to defense or national security aspects, unless such aspects are covered by relevant secondary legislation of the European Union. This is without prejudice to the application of national or European Union provisions on classified information.

<sup>14</sup> That is, reports that do not allow to identify the whistleblower.

<sup>15</sup> Even in the case of external reporting to ANAC, to the judicial or auditing authorities and anonymous public disclosure.

<sup>16</sup> Regardless of the type of contract. Such as, for example, part-time, intermittent, fixed-term, temporary, supply, apprenticeship, ancillary employment relationships, casual services, continuing services, semi-subordinate relationships, work contracts, agency, and sales representative relationships, etc.

- volunteers and trainees (unpaid included);
- self-employed workers, collaborators, consultants, freelancers;
- worker or collaborator at a supplier of goods, services, works.

Shareholders and members of the Company's board, management, control, supervisory or representative bodies even if these functions are performed as a matter of fact (*de facto*) may file reports.

The protection of Whistleblower also applies when the legal relationship with the Company has not yet begun, if information about violations was acquired during the recruitment process or other pre-contractual stages, as well as during the probationary period and after the termination of the legal relationship if the information about violations was acquired during the course of the relationship.

### **2.3 Reported Person**

The natural or legal person mentioned in the report to whom the violation is ascribed or who is involved in the violation, and thus, by way of example only:

- person belonging to the corporate bodies, management, employed personnel of the Company;
- collaborator, consultant, trading partner and any other subject having a legal relationship with the Company and to whom alleged violations and/or illegal conduct can be ascribed to.

### **2.4 Recipient of the Reports**

The recipient of the reports, appointed to the activities of receiving, analyzing, and investigating and, therefore, carrying out the appropriate investigations, is the Company's Supervisory Board.

Where the report involves any of the members of the Supervisory Board, the interested party shall refrain from handling it.

The management of the report may in any case provide for the involvement of other individuals or structures/functions and corporate bodies responsible for carrying out investigative activities as well as for the appropriate provisions/measures stemming from the reported fact-finding, always in compliance with the confidentiality obligations prescribed by the Whistleblowing Regulations and, in particular, the prohibition of disclosing the identification data of the Whistleblower without his or her explicit consent. In particular, the reports received through the dedicated IT platform<sup>17</sup> are shared with the Group Alerts Monitoring Committee of the Parent Company Thales S.A.

If a report identified as Whistleblowing<sup>18</sup> is received by a person other than the Supervisory Board, this other person is obliged to send it to the recipient promptly (and in any case no

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<sup>17</sup> See paragraph 4.1. of the present Whistleblowing Guidelines.

<sup>18</sup> On this point, the ANAC Guidelines of July 2023 specify that for the purposes of identifying the report as whistleblowing and for the application, therefore, of the relevant discipline, account must be taken of whether



later than seven days after receipt), in original with any annexes/attachments, using the dedicated internal channels<sup>19</sup>, in accordance with criteria of maximum confidentiality and in a manner appropriate to protect the identity of the Whistleblower and the persons Reported or otherwise mentioned in the report, without prejudice to the effectiveness of subsequent investigative activities, giving simultaneous notice of the transmission to the Whistleblower.

### **3 PROTECTION AND RESPONSIBILITIES**

#### **3.1 Protection of the Whistleblower**

The Company has adopted appropriate internal reporting channels to ensure the confidentiality of the identity of the Whistleblower.

To ensure the confidentiality of the Whistleblower during all the activities of handling the report, the identified process and the communication channels established by the Company have been implemented in such a way so as not to make the identity of the Whistleblower available to anyone except the subject receiving the reports and appointed to carrying out the investigation. In particular, the reporting information systems made available by the Company provide for the use of encryption protocols designed to prevent information/data breach, even during transfer.

In following these Guidelines, the recipient of the reports shall take appropriate and effective measures so that the confidentiality of the Whistleblower, of any facilitator (i.e., the physical person who supports the Whistleblower in the reporting process and operating in the same work environment) of the facts and persons reported or otherwise mentioned in the report is always ensured.

It shall be ensured that the identity of the Whistleblower cannot be disclosed to parties other than the person receiving the reports and appointed to carrying out the investigation without the express consent of the Whistleblower, and all those involved in the handling of the report, in accordance with the procedures described in these Guidelines, shall be required to protect his or her confidentiality.

Anyone who violates the protective measures taken to ensure the confidentiality of the Whistleblower shall be subject to the sanctions provided for in the Company's disciplinary system.

Within the scope of the disciplinary proceedings, the identity of the Whistleblower may not be disclosed, whereby the notification of the disciplinary violation is based on separate and additional investigations to the report, even if succeeding to the Report. Whereby the disciplinary charge is based, in whole or in part, on the report and the knowledge of the identity of the Whistleblower is essential for the defense of the accused party, the report may be used for the purposes of disciplinary proceedings only in the presence of the express consent of the Whistleblower to the disclosure of his or her identity. In these circumstances, as well as when the disclosure of the identity of the Whistleblower and related information is also essential for the defense of the person involved, notice shall be given to the Whistleblower in writing of the reasons for the disclosure of the confidential data.

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*"the whistleblower expressly declares that he or she wishes to benefit from the whistleblowing protections, or if this intent may be inferred from the report."*

<sup>19</sup> As described in paragraph 4.1 of the present Whistleblowing Guidelines

Retaliatory dismissal, change of duties, adoption of disciplinary measures or other sanctions, treatment in any way unfavorable as well as any other prejudicial measure, adopted against the Whistleblower<sup>20</sup> for reasons directly or indirectly related to the report<sup>21</sup> are null and void. The Whistleblower may notify ANAC of retaliation that he or she believes of having suffered from<sup>22</sup>.

The Whistleblower shall benefit from the above protections only if, at the time of reporting, he or she had well founded reasons to believe that the information on the reported violations was true, and that they fell within the objective scope of what may be reported and filed the report in compliance with the established procedures.

In any case, the person's reasons for reporting are irrelevant to the Company to the aim of his or her protection.

### **3.2 Responsibilities of the Whistleblower**

A Whistleblower making unsubstantiated reports is liable to disciplinary sanctions when it is established, even by a first-degree judgment, that he or she is criminally liable for libel or slander or in any case for the same offenses committed with the report to the judicial or auditing authorities, or that he/she is civilly liable, for the same reasons, in cases of malice or gross negligence. In such circumstances the protections of the Whistleblowing Regulations are not guaranteed.

Unless the act constitutes criminal offense, the Whistleblower shall not incur any liability, including civil or administrative liability, for acquiring or accessing information on the violations.

Criminal liability and any other liability, including that of a civil or administrative nature, is not excluded for the conduct, acts or omissions of the Whistleblower that are unrelated to the report<sup>23</sup> or that are not strictly necessary to disclose the violation. Likewise, any liability, including that of a civil or administrative nature, is excluded for the person who discloses information on violations covered by the obligation of secrecy<sup>24</sup> or relating to the protection of copyright or personal data protection, or discloses information on violations that offend

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<sup>20</sup> The protection of the Whistleblower against retaliatory measures is also applicable in case of a complaint to the judicial or auditing authority or a public disclosure if the legal requirements are met.

<sup>21</sup> Retaliation is defined as any conduct, act, or omission, even if only attempted or threatened, carried out by reason of the report, of the complaint to the Judicial or Auditing Authority, or public disclosure, which causes or may cause the Whistleblower or reporting person, directly or indirectly, unfair harm. The measures to protect the Whistleblower (or the complainant to the Judicial or Auditing Authority or the person who has made a public disclosure) against retaliation, provided for in the Whistleblowing Regulations, also apply to facilitators, to persons in the same work environment as the Whistleblower and who are related to the Whistleblower by a sound emotional bond or kinship relationship within the fourth degree, to colleagues of the Whistleblower who work in the same work environment and who have a habitual and current relationship with said person, to entities owned by or for which the Whistleblower works, and to entities operating in the same work environment as the Whistleblower.

<sup>22</sup> In case of retaliation, ANAC shall inform the National Labor Inspectorate for action within its jurisdiction.

<sup>23</sup> That is, to reporting to the judicial or auditing authority or public disclosure.

<sup>24</sup> This is without prejudice to the application of national or European provisions on classified information - knowledge of which is restricted to authorized persons and defined as such by the competent Authorities - forensic and medical professional secrecy, secrecy of court deliberations, pursuant to the provisions of Article 1, paragraph 3, of Legislative Decree No. 24/2023.



the reputation of the reported person when, at the time of the disclosure<sup>25</sup>, there were reasonable grounds to believe that the disclosure of the information was necessary to reveal the violation and the report was made in compliance with the provisions provided for in the Whistleblowing Regulations.

### **3.3 Protection of the Reported Person and the Persons Mentioned in the Report**

The Company ensures adequate protection for the Reported person from reports made in "bad faith" by applying disciplinary sanctions against the Whistleblower when it is ascertained, even with a first-degree judgment, that he or she is criminally liable for libel or slander or in any case for the same offenses committed with the report to the judicial or auditing authorities, or his or her is civilly liable, for the same title, in cases of malice or gross negligence.

In accordance with the regulations in force, TASI adopts the same forms of protection to ensure the confidentiality of the identity of the Whistleblower also for the Reported person and, in general, for all the persons mentioned in the report, until the conclusion of the proceedings initiated by reason of the report itself.

### **3.4 Violations concerning Whistleblowing**

Without prejudice to any other liability reasons, violations of the Whistleblowing Regulations and these Whistleblowing Guidelines constitute a disciplinary offense and, therefore, entail the initiation of the relevant proceedings and the resulting application of disciplinary sanctions – proportioned in accordance with the object/gravity of the offense committed - in compliance with the provisions of the applicable legislation, collective negotiation, and the Company's internal policy.

In particular, the Company's disciplinary system, as set forth in the Company's Model under Legislative Decree 231/2001, also applies in the following cases:

- when there has been a breach in confidentiality;
- when retaliation is established, or reporting has been hindered or there has been an attempt to hinder it;
- when it is established that reporting channels have not been set up, that procedures for making and handling reports have not been adopted, or that the adoption of such procedures does not comply with the Whistleblowing Regulations, as well as when it is established that the review and analysis of reports has not been carried out;
- when the criminal liability of the Whistleblower for offenses of libel or slander, or in any case for the same offenses committed by means of a report to the judicial or auditing authorities, or his or her civil liability, for the same reasons, in cases of fraud or gross negligence, even by first-degree judgement, is established.

For the same violations (except in the case of conviction in criminal court for the crimes of libel or slander, even if committed by reporting to the Authority) it is also provided that ANAC will apply administrative pecuniary sanctions to the responsible party pursuant to Article 21 of the Whistleblowing Regulations.

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<sup>25</sup> Reporting, reporting to the judicial or auditing authorities, or public disclosure.

## 4 REPORTING PROCEDURE

### 4.1 Internal channels

The Whistleblower submits the **written or oral** report through the following **internal channels**:

- **IT Platform**: dedicated IT system to be used as the preferred channel that may be accessed at the following link <https://thales.integrityline.org> where the Whistleblower, once logged into the home page, must fill in the fields therein and follow the procedures specified within the application for submitting the report.
- **Mail**: hardcopy, regular or registered mail to be sent to the Company's registered office in Via Saccomuro, 24 - 00131 Rome, addressed "*To the Attention of the Supervisory Board.*"<sup>26</sup> The Whistleblower must send the report in two sealed envelopes: the first containing his or her identification data (indicating, where appropriate, the means by which he or she wishes to be contacted) together with a photocopy of his or her ID (identification document); the second containing the report. Both envelopes must then be placed in a third envelope sent to the attention of those in charge;
- **In-person Meeting**: The Whistleblower may submit a request for an in-person meeting with the Supervisory Board by mail following the above directions. The in-person meeting shall be set within a reasonable time from the request. In this case, with prior consent of the Whistleblower, the report shall be documented either by recording on a device suitable for storage and listening, or by appropriate minutes. In the case of minutes, the Whistleblower may review, correct, and confirm what is stated therein by signing the document.

### 4.2 ANAC's External Channel

With reference to the offenses listed in **paragraph 2.1(b)**, the Whistleblower may also file an external report to the Italian National Anti-Corruption Authority (ANAC)<sup>27</sup> as indicated on the web page of the

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<sup>26</sup> The outer envelope must state that it is a Whistleblowing report.

<sup>27</sup> In such cases, the Whistleblower may also make **public disclosures**, in addition to reports to the judicial or auditing authorities, if the legal conditions are met. The person making a public disclosure shall benefit from the protection provided for the Whistleblower if, at the time of the public disclosure, one of the following conditions is met: 1) 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 modalities provided or adopted, and there has been no response within the deadline insofar as the foreseen or adopted measures to follow up the reports; 2) the Whistleblower has well-founded reasons to believe that the violation may constitute an imminent or clear danger to the public interest; 3) the Whistleblower has well-founded reasons to believe that the external report may pose a risk 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.

same Authority (<https://www.anticorruzione.it/-/whistleblowing>)<sup>28</sup>, if one of the following cases occurs:

- the internal reporting channel is not active or does not comply with the legal requirements;
- the report filed through the internal channels has received no follow-up;
- the Whistleblower has reasonable grounds to believe that if he or she filed an internal report, it would not be effectively followed up or that the same report may incur in risks of retaliation;
- the Whistleblower has reasonable grounds to believe that the violation may pose an imminent or clear threat to the public interest.

### **4.3 Sending the Report**

The Whistleblower who identifies or becomes aware, within the work environment, of information relating to unlawful conduct or violations committed or that, on the basis of factual evidence, may be committed within the Company (as well as conduct aimed at withholding such violations), which is the subject of a report in the terms specified above, shall endeavor to provide all information and documents useful to enable to carry out the appropriate investigations and reviews to assess the validity of the reported facts.

The Whistleblower shall collect data pertaining to the violation or unlawful deed to be reported with particular reference to the following:

- personal data of the Whistleblower, work relationship within the Company and points in common;
- clear and complete description of the facts being reported;
- if known, the circumstances of time and place in which the reported facts occurred;
- if known, the personal data or other elements enabling the identification of the person(s) who has/have put in place the reported facts, such as the position or the sector in which he or she/they performs/performs the activity;
- information on any other individuals who may report on the reported facts;
- any documents that may confirm the validity of the reported facts;
- any other information that may provide useful feedback about the existence of the reported facts.

The Whistleblower sends the report to the recipient through the internal communication channels following the abovementioned procedures.

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<sup>28</sup> For the procedures and methods of handling reports submitted to ANAC, please refer to what the Authority itself published on its dedicated webpage.

## **5 MANAGEMENT OF THE REPORTS**

### **5.1 Eligibility Assessment**

As the recipient of the reports, once a report is filed, the Supervisory Board:

- protocols 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
- maintains dialog with the Whistleblower, requesting to provide additional information and elements useful for moving forward with the review from the Whistleblower, if necessary;
- carries out a preliminary review of the report so as to assess its eligibility and thus ensure that the Whistleblower is protected in compliance with the Whistleblowing regulations.

In case of non-eligibility, the recipient files the report, notifying the Whistleblower with the relevant reasons; otherwise, he or she follows up the report by initiating the relevant preliminary investigation.

### **5.2 Preliminary Investigation**

The recipient diligently performs an investigation of the facts that are the subject of the report, with the aim of determining their grounding.

The carrying out of the preliminary investigation about the reported facts may include the involvement of other persons, structures/functions and competent corporate bodies and/or the collaboration of external third parties, always in compliance with the confidentiality obligations described above, in particular the identity of the Whistleblower (of the facilitator, if any), the Reported Party and the persons in any case mentioned in the report.

The Whistleblower may be heard or, at his or her request, shall be heard by the recipient, including by means of a documentary procedure, i.e., through the acquisition of written remarks and documents, always in compliance with confidentiality obligations.

The recipient shall also:

- maintain dialog with the Whistleblower in order to receive essential additional information, documentation, and evidence, also by providing him or her with information concerning the handling of the report;
- prepare a report of the investigation performed and its outcome;
- provide feedback to the Whistleblower by informing him or her of the action being taken or intended to be taken on the report (*i.e.*, the action taken to assess the existence of the reported facts, the outcome of the investigation, and any measures taken), within three months from the date of the acknowledgement of receipt or, in

the absence of such notice, within three months from the expiration of the seven-day period from the submission of the report<sup>29</sup>;

- store all documentation relevant to the report and any related investigation in a dedicated archive, in a suitable manner so as to ensure the traceability of the activities carried out and that there is no access to the information and documents by unauthorized third parties, internal and external to the Company.

## **6 DEFINITION OF REPORT AND RELATED PROCEDURES**

If, following the conclusion of the relevant preliminary investigation activity, the report is found to be well-founded, the recipient shall notify the outcome:

- to the Human Resources Function for the evaluation, in agreement with the Company's CEO *pro tempore*, of any disciplinary sanctions to be applied against those responsible for the facts reported<sup>30</sup>;
- directly to the Board of Directors and the Board of Statutory Auditors, in the person of the Chairman, where alleged misconduct or violations of one or more members of the Board and Control Bodies or Top Management are detected;
- to the Legal, Contracts & Compliance, Human Resources and Procurement Functions, each for the aspects within its competence, if the violation is attributable to parties external to the Company (e.g., collaborators, clients/suppliers, consultants, partners, etc.), in order to put the appropriate contractual clauses in place, if necessary;

The recipient, if illegal conduct relevant under Legislative Decree No. 231/2001 or violations of the Organization, Management and Control Model, the Company and Group Code of Ethics are ascertained, shall act as the Supervisory Board for any proposals for ensuing measures.

If the investigations reveal possible cases of criminal relevance, the findings of the same are forwarded to the Legal, Contracts & Compliance Function for relevant evaluations.

The competent person, function, structure, or body, as identified above, shall promptly provide the recipient with information regarding the decisions made and any consequent measures and/or measures adopted or intended to be adopted with reference to the reported facts, including for the purpose of the relevant communication to the Whistleblower.

## **7 PERIODIC REPORTING**

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<sup>29</sup> It should be noted that in case of a response within the three-month period that is merely interlocutory (in that information regarding the activities to be undertaken and the progress of the investigation has been communicated to the Whistleblower), once the investigation is completed, the recipient must promptly notify the Whistleblower of the outcome.

<sup>30</sup> For any violations/offenses pertaining to the Human Resources Function, communication is made directly to the CEO.



Subject to compliance with the obligations of confidentiality as described above, the recipient shall, at least annually, within the scope of filing periodic reports to the Board of Directors, the Board of Statutory Auditors, as well as to the Company's Administrative and Control Bodies, disclose a summary statement of the types of reports received and associated outcomes.

## **8 PERSONAL DATA PROCESSING**

Thales Alenia Space Italia S.p.A. is the Data Controller of personal data in the management of the reports process.

The processing of personal data within the management of the reports will take place exclusively for the above-mentioned purposes by means of hardcopy and/or electronic tools, with logic strictly related to the purposes themselves and, in any case, in such a way as to ensure the security and confidentiality of the data, in accordance with current legislation on the protection of personal data (EU Regulation 2016/679, Legislative Decree No. 196/2003 as amended and Legislative Decree No. 24/2023).

The data contained in the reports are processed by the recipient of the reports, who may be supported by persons internal or external to the Company in carrying out the investigative activities, always in compliance with the obligations of confidentiality provided for by law to protect the confidentiality of the identity of the Whistleblower (and the facilitator, if any), the Reported Person and the persons in any case mentioned in the report, as well as the content of the report and the related documentation.

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 shall be retained for as long as necessary for the processing of the report, and in any case, no longer than five years from the date of notification of the final outcome of the reporting procedure, subject to confidentiality obligations.

Individuals who process personal data in the management of reports are specially appointed and instructed by the Data Controller in order to ensure the strictest confidentiality and protection of the processed data, operating:

- where internal parties, as Authorized Processors pursuant to Articles 29 and 32(4) of EU Regulation 2016/679 and Article 2-quaterdecies, Legislative Decree No. 196/2003;
- where external parties, as Data Processors pursuant to Article 28 of the EU Regulation 2016/679.

All individuals, as identified above, are required to maintain the strictest confidentiality on the report and all data related to it, committing themselves to adopt all security measures designed to prevent unauthorized third parties from disclosure of the processed information. The same subjects also undertake to minimize the use of personal data, so as to avoid their processing when not deemed necessary.

It is specified that the data subject's rights referred to in Articles 15 to 22 of EU Regulation 2016/679 may not be exercised by request to the Data Controller or by complaint to the Data Protection Authority pursuant to Art. 77 of the Regulation itself, if the exercise of such rights may result in significant and material prejudice to the confidentiality of the identity of the Whistleblower of which he or she has become aware by reason of his or her employment or tasks performed pursuant to Legislative Decree No. 24/2023 (art. 2-undecies of Legislative



Decree No. 196/2003). The exercise of the same rights may, in any case, be delayed, limited, or excluded by communication stating the reasons made without delay to the person concerned. In such cases, the rights of the interested party may also be exercised through the Data Protection Authority in the conditions laid down in Article 160 of Legislative Decree No. 196/2003.