



NUMBER 28	TITLE WHISTLEBLOWING PROCEDURE	DATE 4/12/2023
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WHISTLEBLOWING PROCEDURE

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1. PURPOSE

The institution of Whistleblowing is governed in the Italian legal system by Legislative Decree No. 24/2023 (Whistleblowing Decree), through which the Italian legislator has transposed the community principles expressed in Directive (EU) 2019/1937, strengthening existing rules governed by Legislative Decree No. 165/2001 (public sector), and Legislative Decree No. 231/2001 (private sector) concerning the prevention of corporate crimes, and by Law 179/2017.

The link to the full text of the Whistleblowing Decree is available, among others, on the website of ANAC (National Anti-Corruption Authority), link to page: <https://www.anticorruzione.it/-/whistleblowing>

The principles and rules upon which Alpha Trading has based its internal violation reporting system are described below, in application of the existing legislation.

The ratio behind the legal provision lies in the awareness that often, regardless of the severity of the phenomenon encountered, concerned individuals do not report irregularities for fear of retaliation or discrimination.

The purpose of the procedure is therefore to remove factors that might hinder or discourage reporting, such as doubts about the procedure to follow and fears of retaliation or discrimination. To this end, the procedure aims to provide the whistleblower with operational instructions on how to make a report.

2. RECIPIENTS OF THE PROCEDURE

The recipients of the procedure are:

- Company management and members of corporate bodies;
- Employees of Alpha Trading;
- Shareholders and persons with administration, control, supervision, or representation functions;
- More generally, anyone who is in a relationship of interest with Alpha Trading.

3. SUBJECT OF THE REPORT

Any alleged violation or attempted violation of the public interest in the integrity of the company may be the subject of a report, provided that the subjects listed in the previous point became aware of it in the work context or in any case by reason of the existing relationship with Alpha Trading.

In general, reports may concern:

- Violations of national and European provisions that consist of unlawful acts in specific sectors (public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; environmental protection; consumer protection; protection of privacy and personal data and security of networks and information systems);
- Violations of European provisions (acts or omissions that harm the financial interests of the Union, relating to the internal market, acts and behaviors that defeat the object or purpose of the provisions of Union acts in the aforementioned sectors);
- Violations of national provisions that consist of: administrative, accounting, civil or criminal offenses; unlawful conduct relevant under Legislative Decree 231/2001 or violations of the company's organizational and management models.

Specifically, any event or behavior may be reported if it is believed to cause any type of damage to the company (e.g., economic, reputational, image, environmental damage, or damage to the safety of workers or third parties).

Reports based, for example, on the following are not worthy of protection under this discipline:

- Suspicions or rumors without evidence;
- Personal grievances of the reporting person;
- Claims relating to the employment or collaboration relationship;
- Claims relating to relationships with superiors or colleagues.

4. CONTENT OF THE REPORT

The report must be as circumstantial as possible and provide the maximum number of elements that may be useful to the company to proceed with the necessary verifications and controls, also for the purpose of identifying the perpetrators of the alleged unlawful conduct.

The report must therefore contain the following essential elements: a) The personal details of the person making the report (whistleblower); b) An accurate description of the facts being reported; c) If known, the personal details or other elements (such as job title and department) that allow the identification of the person who carried out the reported act; d) The indication of any other persons who can provide information about the reported facts; e) The indication of any documents that can confirm the veracity of these facts; f) Any other information that may provide useful feedback regarding the existence of the reported facts.

5. RECIPIENTS AND METHODS OF REPORTING

For the transmission of reports, Alpha Trading has provided an internal reporting channel, entrusting

the role of report manager to the "Legal and Personnel Office" in the person of Dr. Simona Petrini.

Reports can be addressed using the following methods:

In written form through the Company's website: A task has been established on the company's website, on the homepage, at the bottom, through which it is possible to make a report in total anonymity which is forwarded to the dedicated email address.

In oral form, by contacting the report manager at the number +39 334 3101685 to schedule a telephone appointment or a direct meeting with the report manager (within 15 days of the request). The outcome of the telephone report or meeting will be transcribed and sent to the reporting person for verification and eventual rectification before countersignature.

It should be noted that anonymous reports, received in written or oral (telephone) form, if they are specific, circumstantial, and supported by suitable documentation, can be equated by the company to ordinary reports, and will be recorded and managed according to the terms of this procedure.

For the methods of external reporting and the verification of cases in which they can be used alternatively to the internal reporting channel, reference is made to the text of the Whistleblowing Decree and the institutional website of ANAC (<https://www.anticorruzione.it/>). In particular, it is highlighted that the external reporting method may be used in the possible cases of conflict of interest, i.e., those instances where the report manager coincides with the reporting person, the reported person, or is otherwise a person involved or interested in the report.

6. MANAGEMENT OF REPORTS

The report manager first evaluates the existence of the subjective and objective prerequisites for making an internal report, specifically that the reporting person is a legitimate subject to make the report and that the subject of the report falls within the scope of application of the discipline.

Once the admissibility of the report has been evaluated, the internal investigation into the reported facts or conduct is initiated, requesting any further clarification from the reporting person and any other subjects involved in the report, with the adoption of the necessary precautions to guarantee the confidentiality of the reporting person and the reported person.

Where necessary, the manager may also acquire acts and documents from other offices, make use of their support, involve third parties, including external professionals, always ensuring that the protection of the confidentiality of the reporting person and the reported person is not compromised.

Once the investigation activity is completed, the report manager may:

Archive the report because it is unfounded, stating the reasons;

Declare the report founded and refer it to the competent internal bodies/functions for the relevant follow-up (e.g., company management, the management, the legal office, etc.). Indeed, the report manager is not responsible for any evaluation regarding individual responsibilities and any subsequent resulting measures or proceedings.

Provide feedback to the reporting person on the outcome of the report within the legal terms (3 months). This feedback may be definitive if the preliminary investigation is completed, or interlocutory regarding the progress of the investigation if not yet finalized. In this case, subsequent

feedback will be provided upon the closing of the investigation.

7. DOCUMENT RETENTION

To ensure the management and traceability of reports and related activities, the report channel manager ensures the archiving of all correlated supporting documentation for the time necessary for the processing of the report and in any case not beyond five years starting from the date of communication of the final outcome of the reporting procedure.

8. PROTECTION OF THE WHISTLEBLOWER

A) Obligations of confidentiality on the identity of the whistleblower and exemption from the right of access to the report

Except for cases where liability for slander and defamation is configurable and in cases where anonymity is not enforceable by law (e.g., criminal, tax, or administrative investigations, inspections by control bodies), the identity of the whistleblower is protected in every context subsequent to the report.

The protection concerns not only the name of the reporting person but also all elements of the report from which the reporting person's identification can be derived, even indirectly.

The protection of confidentiality is extended to the identity of the people involved and the people mentioned in the report until the conclusion of the proceedings initiated due to the report, in compliance with the same guarantees provided in favor of the reporting person.

Violation of the obligation of confidentiality is a source of disciplinary liability.

B) Prohibition of retaliation against the whistleblower

No form of retaliation or discriminatory measure affecting working conditions for reasons related to the complaint is permitted or tolerated against the employee who makes a report pursuant to this procedure.

9. LOSS OF WHISTLEBLOWER PROTECTIONS

The criminal and disciplinary liability of the whistleblower remains valid in the event of a slandering or defamatory report pursuant to the criminal code and Article 2043 of the civil code.

Genoa, 4/12/2023