## Table of Contents

## 1. Definitions

**Code of Ethics**: adopted pursuant to Legislative Decree no. 231/01, it is a document with which the Company sets out the set of rights, duties and responsibilities of the Company itself with respect to all the subjects with whom it enters into relations for the achievement of its corporate purpose. The Code of Ethics aims to establish ethical "standards" of reference and rules of conduct that the Recipients of the Code must comply with in their relations with the Company for the purpose of preventing and suppressing unlawful conduct.

**Collaborators**: those who act in the name and/or on behalf of the Company on the basis of a mandate or other collaboration relationship (by way of example but not limited to: financial advisors, interns, contract and project workers, temporary workers).

**Consultants**: Persons who carry out their activity in favour of the company by virtue of a contractual relationship.

**G.D.P.R.**: European Regulation 2016/679 on the protection of personal data.

**Legislative Decree 231/01 or Decree**: Legislative Decree no. 231 of 8 June 2001 relating to the "Regulation of the administrative liability of legal persons, companies and associations, including those without legal personality" and subsequent amendments and additions.

**Recipients of the Code of Ethics**: shareholders, members of the Corporate Bodies, employees as well as all those who, although external to the Company, work, directly or indirectly, for PLAYSPORT S.P.A. or with PLAYSPORT S.P.A. (e.g. collaborators in any capacity, consultants, suppliers, customers).

**Recipients of the Model**: members of the Corporate Bodies, the auditing firm, employees as well as those who, although not falling into the category of employees, work for PLAYSPORT S.P.A. and are under the control and direction of the Company (by way of example but not limited to: financial advisors, interns, contract and project workers, temporary workers).

**Employees or employees**: employees or employees, i.e. all employees of the Company (first, second and third professional area personnel; middle managers; managers).

**Law 146/2006:** Law No. 146 of 16 March 2006 (Ratification and Implementation of the United Nations Convention and Protocols against Transnational Organized Crime, adopted by the General Assembly on 15 November 2000 and 31 May 2001).

**Model / MOG**: Organisation, management and control model *pursuant to* articles 6 and 7 of the Decree.

**Supervisory Body**: Supervisory Body provided for by art. 6, paragraph 1, letter b) and 7 of Legislative Decree 231/2001, which is entrusted with the task of supervising the operation and compliance with the Model and ensuring that it is updated.

**Reporting**: any information concerning alleged findings, irregularities, violations, reprehensible conduct and facts or in any case any practice that does not comply with the provisions of the Code of Ethics and/or the Organization, Management and Control Model.
**Anonymous reporting**: when the whistleblower's personal details are not explicit or otherwise identifiable.
**Open reporting:** when the whistleblower openly raises an issue without limits related to their confidentiality.
**Confidential reporting**: when the identity of the whistleblower is not explicit, but it is nevertheless possible to trace it in specific and certain hypotheses indicated below.
**Bad faith reporting**: the report made for the sole purpose of damaging or, in any case, causing prejudice to a Recipient of the Code of Ethics and/or the Model. Reports made with intent or negligence
that turn out to be unfounded.
**Company**: PLAYSPORT S.P.A.
**Reporting parties**: the Recipients of the Code of Ethics and/or the Model, as well as any other person who relates to the Company in order to make the report.
**Reported subjects**: the Recipients of the Code of Ethics and/or the Model who have committed alleged remarks, irregularities, violations, reprehensible conduct and facts or in any case any practice that does not comply with the provisions of the Code of Ethics and/or the Organization, Management and Control Model.
**Third Parties**: contractual counterparties of PLAYSPORT S.P.A., both natural and legal persons (such as suppliers, consultants) with whom the Company enters into any form of collaboration contractually regulated, and intended to cooperate with the company in the context of risky activities.
**Subordinates**: persons subject to the management or supervision of a person in a top position pursuant to Article 5, paragraph 1, letter b) of the Decree.

## 2. Purpose

The purpose of this procedure is to establish clear and identified information channels suitable for ensuring the receipt, analysis and processing of reports – open, anonymous and confidential – relating to hypotheses of relevant unlawful conduct pursuant to Legislative Decree no. 231/2001 and/or violations of the Model and/or the Code and to define the activities necessary for their proper management by the Supervisory Body.
In addition, this procedure is aimed at:

a) guarantee the confidentiality of the personal data of the whistleblower and the alleged person responsible for the violation, without prejudice to the rules governing investigations or proceedings initiated by the judicial authority in relation to the facts that are the subject of the report, or in any case disciplinary proceedings in the event of reports made in bad faith;

b) adequately protect the reporting entity against direct or indirect retaliatory and/or discriminatory conduct for reasons related "directly or indirectly" to the report;

c) ensure a specific, independent and autonomous channel for reporting.

## 3. Scope

These regulations apply to the Recipients of the Model and/or the Code of Ethics, namely:

- Partners;
- Members of the Board of Directors;
- Members of the Board of Statutory Auditors;
- Members of the SB;
- Employees;
- Independent Auditors;
- those who, although not falling into the category of employees, work for PLAYSPORT S.P.A. and are under the control and direction of the Company (by way of example but not limited to: interns, contract and project workers, temporary workers);
- those who, although external to the Company, work, directly or indirectly, on a stable basis, for PLAYSPORT S.P.A. or with PLAYSPORT S.P.A. (e.g. continuous collaborators; strategic suppliers);

## 4. Responsibility and dissemination

This procedure is approved by the Board of Directors of the Company which, upon any proposal from the Supervisory Body, is also responsible for updating and supplementing it.

It is accessible: from the following Link https://audit.segnalazioni-pmi.it/#/

The same methods of dissemination set out above are adopted for subsequent revisions and additions to the procedure.

## 5. Reference principles

The persons involved in this procedure operate in compliance with the regulatory and organisational system and internal powers and delegations and are required to operate in accordance with the laws and regulations in force and in compliance with the principles set out below.

KNOWLEDGE AND AWARENESS – this reporting procedure represents a fundamental element in order to ensure full awareness for effective monitoring of risks and their interrelationships and to guide changes in the strategy and organizational context.

GUARANTEE OF THE CONFIDENTIALITY OF PERSONAL DATA AND PROTECTION OF THE REPORTING PARTY AND THE REPORTED PERSON – All subjects who receive, examine and evaluate the reports and any other person involved in the process of managing the reports, are required to guarantee the utmost confidentiality on the facts reported, on the identity of the reported person and the whistleblower who is appropriately protected from retaliatory conduct, discriminatory or otherwise unfair.

PROTECTION OF THE PERSON REPORTED BY REPORTS IN "BAD FAITH" – All subjects are required to respect the dignity, honor and reputation of each one. To this end, the reporting party is required to declare whether it has a private interest related to the report. More generally, the Company guarantees adequate protection from reports in "bad faith", censuring such conduct and informing that reports sent with the aim of damaging or otherwise causing prejudice as well as any other form of abuse of this document are a source of liability, in disciplinary proceedings and in other competent forums.

IMPARTIALITY, AUTONOMY AND INDEPENDENCE OF JUDGMENT – All those who receive, examine and evaluate reports are in possession of moral and professional requirements and ensure that the necessary conditions of independence and due objectivity, competence and diligence are maintained in the performance of their activities.

## 6. Subjects involved

The reporting system can be activated by the following subjects:

- employees (any type of contract) who, in any case, operate on the basis of relationships that determine their inclusion in the company organization, even in a form other than the employment relationship;
- members of corporate bodies;
- third parties having stable business relationships with the Company (e.g. continuous collaborators; strategic suppliers).

## 7. Subject of the report

The subject of the report is the commission or attempted commission of one of the offences provided for by Legislative Decree 231/2001, i.e. the violation or fraudulent avoidance of the principles and requirements of the Organisation and Management Model and/or the ethical values and rules of conduct of the Company's Code of Ethics, of which we have become aware due to the functions performed.

Reports may concern, by way of example but not limited to:

- offences falling within the scope of European Union acts relating to the following areas: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of network and information systems;
- acts or omissions affecting the financial interests of the Union;
- acts or omissions concerning the internal market (e.g. infringements of competition and state aid);
- violations relating to the protection of workers, including accident prevention legislation;
- alleged offences, among those provided for by the Company's Model 231, by company representatives in the interest or to the advantage of the Company;
- violations of the Code of Ethics, Model 231, company procedures

The reports taken into consideration are only those that concern facts found directly by the whistleblower, not based on current items; In addition, the report must not concern complaints of a personal nature.
The whistleblower must not use the institution for purely personal purposes, for claims or retaliation, which, if anything, fall within the more general discipline of the employment/collaboration relationship or relations with the hierarchical superior or colleagues, for which reference must be made to the procedures under the competence of the company structures.

## 8. Procedure for handling reports

### 8.1. Reporting

<u>Internal Reporting</u>

A reporting person, if he or she reasonably suspects that one of the violations referred to in paragraph 7 above has occurred or may occur, has the possibility to make a report in the following ways:

- reporting through the portal available through the link on the company website (preferential channel);

- anonymous reporting, through the special reporting box located at the registered office of the company by sending a registered letter to the registered office.

The reports must be detailed and based on precise and consistent elements, concern facts that can be verified and known directly by the reporter, and must contain all the information necessary to identify the perpetrators of the illegal conduct.

The reporting party is therefore required to clearly and completely report all the elements useful for carrying out the checks and assessments necessary to assess their validity and objectivity, indicating, by way of example and not exhaustively:
- references on the course of events (e.g. date, place) any information and/or evidence that can provide valid feedback on the existence of what has been reported;
- personal details or other elements that allow the person to identify who committed what he or she has made;
- details of any other persons who may report on the facts subject to the Report;
- any private interests related to the Report.

Although the Company, in accordance with the Code of Ethics, deems it preferable to report reports that are not sent anonymously, anonymous reports are also permitted.
Anonymous reports are accepted only if they are adequately substantiated and capable of bringing to light specific facts and situations.
They will be taken into account only if they do not appear *prima facie* to be irrelevant, unfounded or unsubstantiated.
In any case, the requirements of good faith and the truthfulness of the facts or situations reported, to protect the accused, remain unaffected.

A facsimile of *the Reporting Form* (MD 01. WB ODV reporting form, both within the company server and reproduced at the bottom of this procedure).

Once the report has been transmitted, in the manner described above, the whistleblower will be informed by the persons responsible for receiving the report about the time when it is taken over or whether it needs further details in order to be evaluated and examined, as well as in the event that the verification of the report has been completed. The whistleblower has the opportunity to request an update or feedback on his or her report, but also to provide further information in the event that the reported fact is continued, interrupted or even aggravated.

<u>External Reporting</u>

Decree 24/2023 has expanded the channels available to whistleblowers, through the provision of a so-called external reporting channel, prepared and managed by ANAC if the other internal reporting channels are not available.
Access to the ANAC external channel, in accordance with the law, is allowed in the event that:

1. the reporting party operates in a work context in which the mandatory activation of the channel is not envisaged or its preparation does not comply with regulatory requirements;
2. the reporting party has already made a report that has not been followed up;
3. the reporting party has reasonable grounds to believe that an internal report may lead to the risk of retaliation;
4. the reporting party has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

As provided for internal reports, ANAC also has specific duties of activation and feedback towards the whistleblower: the whistleblower must, in fact, be notified of the receipt of the report within seven days from the date of receipt and the reports received must be followed up through an investigative activity, giving feedback to the whistleblower within three or six months (depending on the case). If, then, the report concerns information that exceeds its competences, ANAC must notify the competent authority of the report.
Finally, the legislation on whistleblowing provides for the possibility of reporting wrongdoing through so-called public disclosures, i.e. through the press, electronic means or in any case through means of dissemination capable of reaching a large number of people.

Public disclosure can only be made under specific conditions.
The whistleblower, in particular, may opt for this tool – and, in this case, benefit from the protection provided for by the Decree – if he or she has previously made an internal and external report (or directly an external report) or has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest or that the external report may lead to retaliation or not be effectively followed up.

### 8.2. Review and evaluation of reports

The person responsible for receiving and analysing reports is the Supervisory Body, with regard to violations of the Organisational Model and/or the Code of Ethics, which provides in compliance with the principles of impartiality and confidentiality, carrying out any activity deemed appropriate.

The SB directly carries out all the activities aimed at ascertaining the facts covered by the report.
It may also make use of the support and collaboration of company structures and functions when, due to the nature and complexity of the audits, it is necessary to involve them; as well as external consultants.
In any case, the whistleblower's right to confidentiality is not affected throughout the management of the report.
In summary, the activities in which the report management process is divided are: receipt, investigation and assessment;

- Receipt: the Supervisory Body receives reports;
- Investigation and assessment: the SB evaluates the reports received using, depending on their nature, the Company's internal structures to carry out in-depth investigations into the facts being reported. The facts that are the subject of the report are reported by the whistleblower in the appropriate report form (the facsimile is affixed at the bottom of this procedure). He can directly hear the author of the report - if known - or the subjects mentioned in the same; at the end of the preliminary investigation, it takes the consequent decisions, justifying them, filing the report, where necessary, or requesting the Company to proceed with the assessment for disciplinary and sanctioning purposes of what has been ascertained and/or the appropriate interventions on the MOG.
  If the investigations carried out highlight situations of violations of the MOG and/or the Code of Ethics or the SB has developed a well-founded suspicion of committing a crime, the SB shall promptly communicate the report and its assessments to the shareholders, members of the Corporate Bodies, Top Management, employees, including managers.

Reports sent with the aim of damaging or otherwise causing prejudice to the reported person as well as any other form of abuse of this document are a source of responsibility for the whistleblower, in disciplinary proceedings and in other competent bodies, in particular if the groundlessness of what has been reported and the instrumental and voluntary falsehood of accusations, remarks, censorship, etc.
To this end, if during the course of the checks the report received proves to be intentionally defamatory and the report proves to be unfounded and made with intent or gross negligence, in accordance with the above, the Company may apply appropriate disciplinary measures.

In order to ensure the reconstruction of the various phases of the process, the SB is required to document, through the storage of electronic and/or paper documents, the reports received, in order to ensure complete traceability of the interventions undertaken for the fulfilment of its institutional functions.
The subjects called upon to carry out the investigation activity will be asked to fill in the form "MD 02 Management of the Whistleblowing report" attached to this procedure of which it is an integral part.

Documents in electronic format are stored:
on the appropriate platform, or in a "directory" protected by authentication credentials known by the members of the SB or by the parties expressly authorized by the SB.
In the event of reports produced in obvious bad faith, the SB reserves the right to archive them by deleting the names and elements that may allow the identification of the reported subjects.
Paper documents are stored in an identified place whose access is allowed to the members of the SB or to persons expressly authorized by the SB.

**8.3 Communications to the whistleblower**
Once the report has been received, the Supervisory Body must contact the whistleblower within the deadlines established by EU legislation.
Specifically, the SB will necessarily:

- within a maximum of 7 days, give feedback to the whistleblower that the report has been received;
- within a maximum of 90 days, give notice of the progress of the investigations.

In any case, at the end of the investigations, it is mandatory to give appropriate feedback to the whistleblower relating to the outcome and the contribution provided through his/her report.

**8.4. Protection of the whistleblower and the reported person**

**8.4.I. Whistleblower protections**
The Company, in compliance with the relevant legislation and in order to promote the dissemination of a culture of legality and to encourage the reporting of wrongdoing, ensures the confidentiality of the whistleblower's personal data and the confidentiality of the information contained in the report and received by all parties involved in the procedure and also guarantees that the report does not in itself constitute a violation of the obligations deriving from the employment relationship.

È the task of the Supervisory Body to guarantee the confidentiality of the reporting party from the moment the report is taken over, even in the event that it subsequently turns out to be incorrect or unfounded.
Failure to comply with this obligation constitutes a violation of this procedure and exposes the SB to liability.

In particular, the Company guarantees that the identity of the whistleblower cannot be revealed without his express consent and all those involved in the management of the report are required to protect the confidentiality of the report except in cases where:

- the report is made with the aim of damaging or otherwise causing prejudice to the reported person (so-called "bad faith" report) and there is liability by way of slander or defamation pursuant to the law;
- confidentiality is not enforceable by law (e.g. criminal investigations, etc.);

As regards, in particular, the scope of the disciplinary proceedings, the identity of the whistleblower cannot
be revealed, where the challenge to the disciplinary charge is based on separate and additional investigations with respect to the report, even if consequent to the same. If the complaint is based, in whole or in part, on the report and knowledge of the identity of the whistleblower is essential for the defense of the accused, the report will be usable for the purposes of disciplinary proceedings only in the presence of the whistleblower's consent to the disclosure of his identity.

No form of retaliation or discriminatory measure, direct or indirect, on working conditions for reasons directly or indirectly related to the complaint is allowed or tolerated against the whistleblower. Discriminatory measures include unjustified disciplinary actions, demotion without justified reason, harassment in the workplace and any other form of retaliation that leads to uncomfortable or intolerable working conditions.

### 8.4.II. Protection of the reported

In accordance with current legislation, the Company has adopted the same forms of protection to guarantee the privacy of the Whistleblower also for the alleged perpetrator of the violation, without prejudice to any further form of liability provided for by law that imposes the obligation to communicate the name of the Whistleblower (e.g. requests from the judicial authority, etc.).
This document does not affect the criminal and disciplinary liability of the whistleblower in "bad faith", and any forms of abuse of this procedure, such as manifestly opportunistic reports and/or made for the sole purpose of damaging the accused or other subjects, and any other hypothesis of improper use or intentional instrumentalization of the institution subject to the this procedure.

## 9. Data processing for privacy purposes

PLAYSPORT S.P.A. ensures the protection of the personal data of the whistleblower, the reported person and all other parties involved in accordance with the provisions of European Regulation 2016/679.

The Data Controller of personal data pursuant to art. 4, paragraph 7 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data, as well as on the free movement of such data in the management of Reports, is identified as the legal person of PLAYSPORT S.P.A., in relation to which the ownership of the relationship(s) to which the data refer insists.

All company personnel are made aware of the purposes of the processing of their data in the event of a report, of their rights and of the methods of exercising them, through a specific information notice at the bottom of the report forms.

The text of the information is reported below:

"PLAYSPORT S.P.A., a company with registered office in Via Trento e Trieste, 122/c – Vedelago (Tv), owner of the processing of personal data, pursuant to G.D.P.R. informs that your personal data acquired through this report will be processed exclusively for purposes related to compliance with the obligations deriving from Legislative Decree 231/2001, as well as used, and subsequently stored, mainly in paper form.

Having recognized the legitimacy of even "anonymous" reports, the provision of your data appears optional and your refusal to do so will not have any consequences on the validity of the work of the Supervisory Body of PLAYSPORT S.P.A. (hereinafter more simply O.d.V.). The whistleblower remains, in any case, personally responsible for any defamatory content of his communications and PLAYSPORT S.P.A., through its Supervisory Body, reserves the right not to take into consideration the reports produced in evident "bad faith".
PLAYSPORT S.P.A. also reminds you that the data you provide must be relevant to the purposes of the report, so that the Supervisory Body will be free not to follow up on reports concerning conduct or subjects unrelated to the obligations deriving from Legislative Decree 231/2001. Except for the fulfilment of obligations deriving from the law, the personal data you provide will not have any scope for communication and dissemination. Pursuant to the G.D.P.R., you may exercise the following rights:

- obtain information on the origin of your data as well as the purposes and methods of processing, the logic applied in the case of processing carried out with the aid of electronic tools, the identification details of the owner and data processors as well as the subjects or categories of subjects to whom the personal data may be communicated.

- obtain the updating, correction or, when interested, integration of the data; the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; the certification of the transactions that have been brought to the attention of third parties, also with regard to their content; of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right.
- object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection.

To exercise the aforementioned rights, you may contact the Supervisory Body directly, via e-mail address:
- odv@playsportspa.com
- or, by ordinary mail to the Supervisory Body c/o the Company's registered office in "PLAYSPORT S.P.A."

## 10. Attachments

- MD 01. ODV Whistleblowing Reporting Form
- MD 02. Whistleblowing report management