



Whistleblowing Procedure



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1. Purpose

The Cerved Group (“Group”) conducts its business with loyalty, fairness, transparency, honesty, integrity and in accordance with the national and international laws, regulations and rules and general standards and guidelines applicable to its activities.

The Group promotes the adoption of tools aimed at preventing, identifying and communicating behaviors that are illegal and/or carried out in violation of the ethical principles endorsed by the Group. **Consequently, the Group encourages all legal representatives, directors, executives and employees of Group companies and invites all other third parties who interact with the Group to report any violations that are relevant for the purposes of this Procedure of which they may become aware.**

To allow the filing of violation report, the Cerved Group adopted the **Whistleblowing System (“Whistleblowing”)**, subject of this Procedure, which has the following characteristics:

- it is a multichannel system that includes an advanced web platform, completely separate from and independent of the Group’s IT systems, and can be used to file violation reports from any device in a highly confidential and facilitated mode that guarantees the protection of the personal data of the whistleblowers;
- it is a single system for the entire Group, centrally managed (but within the whistleblowing management system the requisite information flows towards the management bodies of the Group companies affected by the violation report, based on the subject matter in question or the affected parties, are always guaranteed);
- it guarantees high standards of confidentiality for the information and the identities of the person subject of the violation report and the whistleblower, also leaving to the whistleblower the option of making the report anonymously.

The purpose of this Procedure is to explain the principles adopted to protect whistleblowers, the modalities for filing violation reports, the corresponding management process and any possible action resulting from verified violation reports.

The training for this Procedure is part of the training process for its intended recipients and is provided on a regular basis, as needed.

2. Scope of Implementation

Respect for the relevant laws and the rules of the Cerved Group, this Procedure in particular, is mandatory for all Cerved Persons. This Procedure is applicable to Cerved Group S.p.A. and the companies it controls and to the violation reports received by Cerved and its subsidiaries, both in Italy and abroad.

The first adoption of this procedure by the Board of Directors of Cerved Group S.p.A. was on **October 29, 2018** and its adoption is mandatory for all the companies of the Group that, as of that date, have adopted it in a timely manner through a resolution of their Board of Directors.

Updates to this procedure are immediately applicable to the entire Group; any specific additions or revisions by individual companies are approved by their boards of directors.

Companies that may be established and/or may have joined the Cerved Group after the approval of this Procedure shall adopt the Procedure and designate their Whistleblowing System Manager by a resolution of their Board of Directors (or the corresponding corporate body/function/role, when the subsidiary's governance system does not call for such a corporate body) promptly during the first available meeting and, in any case, not later than 90 days from the date when it was established or joined the Cerved Group, as the case may be.

This procedure has been drawn up to be in line with the fulfilments and requirements foreseen by the UNI ISO 37001 standard – Anti bribery management systems.

2.1 EXTERNAL REFERENCES

The procedure was prepared in line with Legislative Decree 10 March 2023, n. 24 - Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, concerning the protection of persons who report violations of Union law and containing provisions concerning the protection of persons who report violations of national laws.

The specifics relating to the legislation of the Cerved Group companies operating in Romania and Greece and indicated below:

- Law 361 of 19 December 2022 - Law transposing into Romanian national law Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019;
- Law 4990/2022 (Government Gazette A 210/11.11.2022) - Law transposing into Greek national law Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019;

are listed in Appendices 1 and 2.

3. Definitions

- **WHISTLEBLOWING WEB PORTAL:** The web channel used to receive violation reports and the corresponding digital whistleblowing platform accessible by Cerved Persons and third parties who interact with the Group through its website company.cerved.com.
- **ALTERNATIVE INTERNAL REPORTING CHANNELS:** additional internal channels for the receipt of reports by email, ordinary post and verbally. Internal reports in oral form are made through telephone lines or at the request of the reporting person, through a direct meeting with the System Manager set within a reasonable time¹.
- **EXTERNAL REPORTING CHANNELS:** these refer to reporting channels external to Cerved, to which the whistle-blower may turn even if they have already made a report via one of the internal channels (including the digital reporting channels), or by directly resorting to the reporting channels made available by the following authorities:
 - **for Italy:** National Anti-Corruption Authority (ANAC);
 - **for Romania:** to the National Integrity Agency (“NIA – National Integrity Authority”);
 - **for Greece:** National Transparency Authority (“NTA”);

and, where applicable, to Union institutions, bodies, offices and agencies competent from time to time for the subject matter of the report.

External channels can also be **Public Disclosures** or **Reporting to the judicial or accounting authority**.

ATTENTION: the use of the internal channel is favored as a priority and, only if one of the conditions referred to in art. 6 Legislative Decree 24/2023 (referred to in par 6.6.2), it is possible to make an external report.

- **CERVED or the CERVED GROUP or the GROUP:** Cerved Group S.p.A. and the companies directly or indirectly controlled by Cerved Group S.p.A.
- **CODE OF ETHICS:** The document that sets forth the reference values and principles that guide activities and transactions with the parties with whom the Group interacts in the pursuit of its corporate purpose.
- **PUBLIC DISCLOSURE:** making information about violations publicly available through the press or electronic media or otherwise through means of dissemination capable of reaching a large number of people².

¹ Legislative Decree 24/2023 – Chapter II Article 4 c. 3

² Legislative Decree 24/2023 – Chapter I Art. 1 lett. f

- **FACILITATOR:** a person who assists a reporting person in the reporting process, operating within the same work environment and whose assistance must be kept confidential³.
- **COMPETENT FUNCTION/CORPORATE BODY:** The function and/or corporate body responsible for defining possible corrective actions to remedy the consequences of a violation and, as applicable, recommending disciplinary measures. Exclusively with reference to Legislative Decree No. 231/2001, the relevant function is always the Oversight Board appointed by the Group company to whom the violation report is applicable.
- **ALTERNATIVE MANAGER:** person to contact when the System Manager is in one of the situations of potential "conflict of interest" referred to in par. 6.6.1. The Alternative Manager is identified in the Supervisory Body of the Group company concerned from time to time. Communications to the Alternative Manager will be forwarded to the competent Supervisory Body from time to time directly through the reporting system.
- **INFORMATION ON VIOLATIONS:** information, including well-founded suspicions, regarding violations committed or which, on the basis of concrete elements, could be committed in the organization with which the reporting person or the person who files a complaint with the judicial or accounting authority maintains a legal relationship as well as the elements concerning conduct aimed at concealing such violations.
- **231 MODEL:** The Organization, Management and Control Model adopted by each Cerved Group company pursuant to Legislative Decree No. 231/2001.
- **REPORTING OR REPORTING PERSON (WHISTLEBLOWER):** the person who reports or publicly discloses information on violations acquired in the context of his or her work context⁴.
- **PERSON INVOLVED or REPORTED:** the person or company mentioned in the internal or external report or in the public disclosure as a person to whom the violation is attributed or as a person otherwise implicated in the reported or publicly disclosed violation⁵
- **CERVED PERSONS:** shareholders, the members of the corporate governance bodies, persons with administrative, management, control, supervisory or representative functions, all employees and, more generally, all parties who perform their work activity for Cerved's benefit (such as self-employed workers, collaborators, freelancers, consultants, volunteers, trainees, etc.) and any other party, person or legal entity, with whom Cerved interacts in the course of its business activity who become aware, in a public or private working context, of the conduct indicated in this procedure or of violations of national or European Union regulatory provisions that harm the public

³ Legislative Decree 24/2023 – Chapter I Art. 1h

⁴ Legislative Decree 24/2023 – Chapter I Art. 1 lett. g

⁵ Legislative Decree 24/2023 – Chapter I Art. 1 lett. L

interest or the integrity of the public administration or private entity⁶. These subjects are treated as Facilitators, people from the same working context as the reporting person, the person who has filed a complaint to the judicial or accounting authority or the person who has made a disclosure and who are linked to them by a stable emotional bond or of kinship within the fourth degree; work colleagues of the reporting person or of the person who has filed a complaint with the judicial or accounting authority or made a public disclosure, who work in the same work context as the same and who have a regular and current relationship with that person; entities owned by the reporting person or by the person who has filed a complaint with the judicial or accounting authority or which has made a public disclosure or for which the same people work, as well as entities that operate in the same working environment as the aforementioned persons⁷. The protection applies BEFORE - DURING and POST employment / collaboration relationship.

- **WHISTLEBLOWING SYSTEM MANAGER:** Role performed by the Managers of the Internal Auditing Function, for all Italian subsidiary of the Group, except for the following companies:
 - Cerved Rating Agency S.p.A. identified in the Head of the Compliance & Risk Management Department of the company;
 - or Cerved Master Services S.p.A. – identified in the Head of the Compliance, AML & Risk Management Function of the company.

A local System Manager has also been identified for the Group's foreign companies.

The Whistleblowing System Manager is responsible for ensuring that the whistleblowing management process is handled in accordance with existing regulations. If the Whistleblowing System Manager finds himself/herself in one of the situations described in Section 6.1 *infra*, the management of violation reports is transferred to the Alternative Manager specified in the abovementioned section.

- **RESPONDENCE:** communication to the whistleblower of information on the follow-up given or intended to be given to the report⁸.
- **RETALIATION:** any conduct, act or omission, even if only attempted or threatened, occurring by reason of the report, the complaint to the judicial or accounting authority or public disclosure and which causes or is likely to cause the reporting person or the person making the complaint, directly or indirectly, unjust damage⁹.
- **MATERIAL VIOLATION REPORT (S):** A violation report that concerns:

⁶ Legislative Decree 24/2023 – Chapter I Art. 1 c. 1

⁷ Legislative Decree 24/2023 – Chapter I Article 3 c. 5

⁸ Legislative Decree 24/2023 – Chapter I Art. 1 lett. o

⁹ Legislative Decree 24/2023 – Chapter I Art. 1 lett. l

- a) the Chief Executive Officer, senior management, directors or members of the control body of Cerved Group or a Cerved Group company;
 - b) Cerved Persons from multiple company entities or multiple Group companies;
 - c) and its related to acts or facts of criminal relevance, systematically repeated violations or retaliatory behavior against the whistleblower; it could entail a high risk of regulatory or legal penalties, substantial financial losses or material impacts on the Group's assets and financial position, reputational damages and/or the malfunctioning of critical IT procedures.
- **FOLLOW-UP:** the action taken by the subject entrusted with the management of the reporting channel to assess the existence of the facts reported, the outcome of the investigations and any measures adopted.
 - **WHISTLEBLOWING SYSTEM or SYSTEM:** The multichannel system used to receive and manage the violation reports subject of this Procedure.

4. General Principles

The functioning of the Whistleblowing System is based on the following fundamental principles:

- **Access:** Only the Intended Recipients of this Procedure (as defined below) can access the System to file a violation report.
- **Intended Recipients:** All Cerved Persons and all third parties who interact with the Group are authorized to file violation reports through the System described in this Procedure.
- **Obligation to report unlawful conduct:** The Intended Recipients are required to report the violations of which they become aware or of which they have a reasonable suspicion.
- **Ban on retaliation, harassment or discrimination against whistleblowers¹⁰:** Whistleblowers shall be protected against any direct or indirect acts of retaliation, harassment or discrimination related, directly or indirectly, with the violation report; this protection shall be guaranteed for the whistleblower provided that the violation report, while meritless, is nevertheless based on good faith and reasonableness criteria. Any violation of the abovementioned prohibition shall result in the activation of special disciplinary proceedings. To that effect, the Whistleblowing System Manager, with the support of the Group's Human Resource Function, shall monitor any retaliatory, disloyal, harassing or discriminatory behaviors against whistleblowers, through the analysis and overall assessment of the applicable "red flags" (by way of example: changes in office or job description, transfers to a different location, job change requests, long illness related absences, disputes/disciplinary measures, requests for unpaid leaves of absence, negative performance reviews, setting of impossible targets, etc.). Whistleblowers who believe that they were the target of retaliatory or harassing behavior due to a previous assessment are encouraged to file a new violation report regarding any retaliation that they suffered. In such cases, a prompt implementation of investigative activities by the Whistleblowing System Manager, with the support of the functions affected by the facts subject of the violation report, is guaranteed. Persons who should believe that they have suffered retaliatory or harassing conduct as a result of a report can also communicate the circumstance to ANAC, via the dedicated website.
- **Ban on conduct aimed at obstructing the reports¹¹:** considering the point previously outlined, it is equally forbidden to engage in conduct designed to obstruct the making of a report. In the event of a violation of said ban the specific disciplinary provision shall be implemented. The whistleblowers (or more in general the Recipients) that may believe they have been subject to obstructive behavior in this regard, are required to communicate this at the time of making the report.

¹⁰ Legislative Decree 24/2023 - Chapter II Art. 17 and Art. 19

¹¹ Dir. EU 2019/1937, art. 23, para. 1, letters a) to d).

- **Prohibition to file patently baseless and/or defamatory violation reports:** filing violation reports that are patently baseless and/or filed maliciously with a defamatory intent is forbidden; the filing of patently baseless and/or defamatory violation reports may result in the adoption of disciplinary measures for the protection of Cerved and the party subject of the violation report.
- **Duty of independence and professionalism in managing violation reports:** All parties involved, in any capacity, in the whistleblowing management process must perform their respective tasks respecting the independence obligation and guaranteeing an accurate and efficient handling of violation reports.
- **Protection of the whistleblower's identity and of the confidentiality of the information:** Cerved guarantees the confidentiality of the identity of the reporting person and any other information from which that identity may be inferred, directly or indirectly, without the express consent of the reporting person¹². The confidentiality of the information contained in reports is also protected at every stage of the reporting process, to the extent that anonymity and confidentiality are enforceable under the law; the measures adopted to protect the confidentiality of the whistleblower are aimed, *inter alia*, at ensuring that the whistleblower is not subject to any type of retaliation. The violation of this principle can result in the activation of disciplinary proceedings against the perpetrator of such violation and the imposition of the corresponding disciplinary measures, consistent with the applicable national labor laws. If the knowledge of the identity of the reporting person is indispensable for the defense of the accused of any disciplinary sanction, the report will be usable for the purposes of the disciplinary procedure only in the presence of the express consent of the reporting person to reveal his identity¹³.
- **Protection of the parties' subject of the violation report:** Parties who are the subject of a violation report are protected with regard both to the confidentiality of the reports that concern them and any investigations carried out and to any retaliatory and/or defamatory violation reports.
- **Protection of the integrity of violation reports:** The Whistleblowing web portal guarantees that no violation report (from the notification phase to the decision phase) is deleted and/or altered.
- **Ban on waiving of rights¹⁴:** the rights and the appeal procedures foreseen by directive 2019/1937 cannot be waived or limited because of agreements, regimens, employment forms or conditions, including a pre-litigation arbitration agreement.

¹² Legislative Decree 24/2023 - Chapter II, Art. 12 c. 2

¹³ Legislative Decree 24/2023 - Chapter II, Art. 12 c. 5

¹⁴ Dir. EU 2019/1937, art. 24.

5. Reportable Conduct

This Procedure is applicable to reports concerning violations that could have an impact on the companies of the Cerved Group and on their business activities.

More specifically, the Whistleblowing System (**Whistleblowing**) makes it possible to report acts or facts that involve legal representatives, directors, executives and/or employees of the Cerved Group, of companies that are not subsidiaries but in which the Group holds a significant equity interest and of joint ventures and/or, in any case, anyone who operates in the name, on behalf or in the interest of Cerved (by way of example: consultants, suppliers, agents, etc.).

Acts or facts that are the subject of violation reports could concern the following issues:

- with regard to all Group companies:
 - ✓ violations of the Group's Code of Ethics;
 - ✓ unlawful conduct relevant pursuant to Legislative Decree No. 231/2001 and violations of the 231 Model adopted by the companies of the Group. In this case, with the full implementation of all the protections for the reporter provided for in this Procedure, the fact being reported is also reported to the Oversight Board of the relevant Company;
 - ✓ violations of the procedures adopted by the Group Companies, and especially, among other internal procedures/regulations, violations of the Antibribery Management System, the Group's Anticorruption Policy and/or the "Anticorruption due diligence towards Relevant Third Parties" as well as the procedure related to conflicts of interest and the procedure linked to the antitrust compliance program;
 - ✓ business integrity issues (e.g., unfair conduct in the handling of business activities, corruption, damaging events that involve customers, conflicts of interest) that also include all aspects related to the following cases:
 - unlawful conduct, relevant pursuant to the regulations applicable to the activities carried out by the Group (e.g. Antitrust Law, Anti-Corruption Law, European Union Law ...)
 - conduct, acts or omissions detrimental to the public interest or the integrity of the public administration or private entity and consisting of:
 - administrative, accounting, civil or criminal offences;
 - offences that fall within the scope of the European Union or national acts indicated in the Annex to this Decree or national acts that constitute the implementation of European Union acts;
 - acts or omissions affecting the financial interests of the Union;

- acts or omissions affecting the internal market (by way of example: competition and State aid violations);
 - acts or conduct that frustrate the object or purpose of the provisions of Union acts.
- ✓ financial integrity issues (e.g., accounting violations, corporate fraud, theft, incorrect use of company resources);
- with regard to Cerved Group companies that engage in credit recovery activities, in addition to the issues listed above with regard to all Group companies, violations of the laws against money laundering set forth in Legislative Decree No. 90/2017, as amended;
- with regard to **Cerved Master Services S.p.A.**, in addition to the issues listed above with regard to all Group companies:
 - ✓ violations of the laws that govern banking activities, understood to mean the main and instrumental activities referred to in Article 10, Sections 1, 2 and 3, of the Uniform Banking Code (including the Oversight regulations for banks issued by Bank of Italy); and/or
 - ✓ violations of the laws against money laundering set forth in Legislative Decree No. 90/2017, as amended;
- with regard to **Cerved Rating Agency S.p.A.**, in addition to the issues listed above with regard to all Group companies, violations of Regulation No. 1060/2009 of the European Parliament and Council of September 16, 2009, as amended, concerning credit rating agencies and the internal rules and procedures of Cerved Rating Agency S.p.A.

The abovementioned violations do not have to be reported through the System if they are discovered in the course of an audit or any other investigative activity.

Please keep in mind that the System cannot be used for personal grievances of the Whistleblower or for claims/demands that are covered by the rules governing employment relationships or relationships with a hierarchical superior or colleagues, which should be addressed to the Group's Human Resource Function.

Cerved customers who wish to report problems of a **commercial** nature and/or related to the Group's services can do so using the dedicated channels available on the website www.cerved.com.

6. Whistleblowing Management Process

6.1. ANONYMOUS VIOLATION REPORTS

Cerved provide the option of filing violation reports anonymously. These shall be taken on and managed, as per named reports.

If the internal report is submitted to a person other than the System Manager, who has been identified as competent and authorised to deal with it, the recipient shall transmit the report within 7 days of its receipt to the competent System Manager, simultaneously notifying the reporting person of the transmission.

6.2. ACCESS TO THE DIGITAL WHISTLEBLOWING CHANNEL AND FILING OF VIOLATION REPORTS

The Whistleblowing web portal (<https://ewhistle.cerved.com>), is freely accessible via the web to all Cerved Persons.

For anonymous violation reports, whistleblowers shall enter directly in the “fill-in” page of the Whistleblowing portal the discovered violation (filling in all of the required fields).

For violation reports that are not anonymous, whistleblowers must fill in their identification data in the fields provided for that purpose in the fill-in page of the Whistleblowing portal and report the discovered violation (filling in all of the required fields).

The Whistleblowing web portal enables whistleblowers to report the violation selecting the type of unlawful conduct in question (Legislative Decree No. 231/2001, Code of Ethics, Laws against money laundering, Banking regulations, anticorruption, etc.) and specify the affected Group company.

A violation report shall:

- contain a precise description of the facts subject of the violation report and of the persons involved (possible responsible parties and potential witnesses);
- provide additional information, annexing any documents that support the fact subject of the violation, using the document upload function provided for that purpose.

After receiving a violation report, the Whistleblowing web portal renders the data of the whistleblower and the reported violator anonymous, automatically entering them into a separate archive, managed with IT modalities by the Whistleblowing System Manager and accessible only by him/her, where all of the abovementioned data will be stored.

¹⁵See, art. 9, para. 1, letter e).

The personal data contained in each database are encrypted by using special and different encryption keys. The ban on tracking reporting channels is ensured.

The Whistleblowing web portal will then display initial information confirming the reception and acceptance of the violation report and issue a **univocal identification code** for the violation report, with which the whistleblower can access the Whistleblowing web portal to see any requests for clarification and the violation report's assessment status. This code cannot be used in any way to identify the whistleblower, who can thus remain anonymous and, at the same time, access the violation report to see its status and respond to any request for clarifications.

It is the duty of each whistleblower to diligently safeguard the violation report's univocal code, not to communicate it to others and prevent third parties from accessing information about the violation report.

Whistleblowers are urged to periodically access the Whistleblowing portal to verify the presence of any clarification requests regarding filed violation reports.

The System Manager (or the Alternative Manager) sends the reporting person acknowledgement of receipt of the report within seven days from the date of receipt; thereafter, it maintains contact with the reporting person, requesting additions from the latter if necessary.

The System Manager (or the Alternative Manager) shall diligently follow up on the reports received and shall acknowledge the report **within three months from the date of the acknowledgement of receipt or, in the absence of such an acknowledgement, within three months from the expiry of the period of seven days from the submission of the report.**

6.3. ACCEPTANCE OF A VIOLATION REPORT AND PRELIMINARY ASSESSMENT

After receiving a violation report, the Whistleblowing portal shall send a notice of reception of a new violation report (without providing information regarding the content of the violation report) to the email inbox of the Whistleblowing System Manager of the company concerned by the report.

After receiving a violation report (either through the Whistleblowing portal or the alternative channels), the Whistleblowing System Manager shall perform a preliminary assessment and classify the violation report based on its nature.

During this phase, the Whistleblowing System Manager can automatically ignore ("spike") and not manage violation reports that are patently baseless, malicious or beyond the scope of implementation of this Procedure. "Spiked" violation reports are also stored in the IT archive of the Whistleblowing portal, which does not allow any type of alteration (see Section 0 *infra*). Please note that violation reports that do not fall within the objective scope of implementation of this Procedure

shall be treated as if they had not been received and, consequently, will not be taken into consideration in any way nor will they be transmitted to other corporate entities or/functions that may have jurisdiction over the issues subject of the violation reports.

If in the course of managing a violation report there should arise potential conflict of interest situations, the Whistleblowing System Manager cannot “spike” the report, adopting instead measures that are deemed better suited to guarantee the correct handling of the violation report. In such cases, the provisions of Section 6.8 *infra* shall apply.

The violation report acceptance phase must be completed in a timely manner.

6.4. ASSESSMENT

For violation reports that were not automatically “spiked,” the Whistleblowing System Manager shall verify whether each one of them contains sufficient information to assess its merit; if a violation report that is not patently baseless, malicious or beyond the scope of implementation of this Procedure lacks sufficiently detailed information, the Whistleblowing System Manager shall ask the whistleblower, as appropriate, to provide additional information/clarifications.

These requests for additional information shall be transmitted to the whistleblower as soon as possible.

After completing this initial assessment and receiving the clarifications deemed necessary, the Whistleblowing System Manager shall:

- close the violation reports that, based on a preliminary review, were found to be baseless and/or not adequately documented despite the clarifications received,

or

- proceed with the investigative phase for violation reports that, after a preliminary verification, were found to be reasonably credible and supported by sufficient evidence to proceed with the investigative phase.

In the latter case, the Whistleblowing System Manager shall define a specific “investigation plan,” spelling out:

- the investigation’s implementation modalities (requests for additional information/clarifications from the whistleblower, performance of verifications deemed necessary, etc.);
- the Group companies and/or company functions that may have jurisdiction based on the subject matter of the territory; and
- the timing for completing the investigation.

The governance bodies of the Group companies and/or company functions involved in the “investigation plan” shall fully cooperate with the Whistleblowing System Manager to the extent necessary to carry out the investigation, consistent with the principles and guarantees provided by this Procedure.

At the end of the investigative phase, the Whistleblowing System Manager shall draw up a report on the outcome of the investigation that was carried out.

6.5. DECISION

Based on the findings of the investigation, the Whistleblowing System Manager shall identify the company function/body with jurisdiction to conduct appropriate assessments and to issue a decision for each violation report, defining possible appropriate corrective actions to remedy the consequence of the violation and prevent the risk of violations similar to the one subject of the violation report and transmitting to the abovementioned function/body the report drawn up at the end of the investigative phase.

The competent company bodies/function, after reviewing the Whistleblowing System Manager’s report, shall consider possible corrective measure and, if appropriate, recommend disciplinary measures.

Disciplinary measures shall be approved by the Human Resource function of the Cerved Group and must be communicated to the Group company involved (Board of Directors, Chief Executive Officer, other roles/functions that are jurisdictionally competent in each occasion).

With regard to verified violations that are relevant for the purposes of this Procedure, corrective actions and disciplinary measures shall be suggested to the functions/company bodies that are jurisdictionally competent on each occasion.

If the violations concern acts or behaviors performed by members of the Board of Directors, the necessary decisions shall be adopted by the Board of Directors collectively, with the abstention of those directly involved, where present the Board of Statutory Auditors will also be consulted.

The measures adopted shall be communicated to the Whistleblowing System Manager and the perpetrator of the violation and then officially adopted by the Group Human Resource function or another jurisdictionally competent corporate body, in accordance with applicable national labor laws. The adoption of disciplinary measures shall be communicated to the Whistleblowing System Manager by the jurisdictionally competent corporate body/function.

Disciplinary measures shall be adequate and proportionate to the verified violation, taking also into account any criminal law consequences of the behaviors carried out and shall be consistent with the

provisions of the applicable national labor laws according with the Sanction System of each Organizational Model applicable to the specific case.

The Whistleblowing System Manger shall periodically verify the actual implementation of the corrective measures adopted further to the violation reports received and reflect the findings of his/her verifications in a report addressed to the jurisdictionally competent corporate bodies/functions.

6.6. ALTERNATIVE REPORTING CHANNELS

6.6.1 INTERNAL ALTERNATIVE CHANNEL

Violation reports must be filed through the Whistleblowing web portal - as it was developed specifically to ensure ease of use, anonymity, confidentiality and privacy, thereby providing the best protection for whistleblowers - accessible from any pc, tablet or smartphone (both personal and company devices).

Whistleblowers can use the **internal alternative channels**:

- **email to the addresses listed below**, accessible exclusively by the Whistleblowing System Manager of each Group company:

- (i) for Cerved Master Services S.p.A.: whistleblowingCMS@cerved.com;
- (ii) for Cerved Rating Agency S.p.A.: whistleblowingCRA@cerved.com;
- (iii) for all other Group companies: whistleblowing@cerved.com;

- **regular mail** to the address for each Group company's respective registered office, to the attention of the Whistleblowing System Manager of the Company concerned by the report.

If a modality different from the Whistleblowing web portal is used to file a violation report, in order to benefit from a higher assurance of confidentiality, it is necessary that:

- the subject of the e-mail contains the wording "confidential/personal"
- the report is placed in a sealed envelope bearing the wording "confidential/personal" on the outside.

- **Verbal reports**, which can be made:

- **through the unregistered telephone line made available by Cerved (numbers available on the website)**. The following different numbers are foreseen:
 - one for reports concerning Cerved Rating Agency SpA;
 - one for reports concerning Cerved Master Services SpA;
 - one for reports concerning Group companies based in Greece (Greek language);

- one for reports concerning Group companies based in Romania (Romanian language);
- one for reports concerning all the other companies or countries of the Cerved Group.

All lines allow for reporting in English.

In this case, the System Manager will proceed to formalize the report within the digital channel through a detailed account of the conversation. The reporter will be given the report ID number to enable him/her to access the report, verify it and/or request corrections, and finally approve it through the confidential communication channel present within the digital reporting channel.

- **through a meeting with the System Manager.** In this case, the System Manager, subject to the consent of the reporting person, will document the report, if possible, within the digital reporting channel, in the presence of the reporting person, then asking for confirmation of the contents and acquiring, where possible, a signature of what was reported.

It should be noted that even the reports made on internal channels alternative to the Digital Reporting Channel shall subsequently be included in the Digital Reporting Channel.

However, the invitation to use the Digital Reporting Channel is renewed, except when this channel is not available for technical reasons, because:

- i. the use of alternative channels cannot guarantee the same level of protection for whistleblowers and of efficiency in the management of violation reports;
- ii. in the case of anonymous violation reports, using the Digital Whistleblowing Channel is the only modality for requesting that the whistleblower provide clarifications while remaining anonymous, based on the modalities described in Section 6.2. *infra*.

Anyone who receives a violation report through internal alternative channels instead of the Whistleblowing web portal shall promptly forward it to the Whistleblowing System Manager, or to one of the parties listed below as “Alternative Managers,” who will enter it in the Whistleblowing portal.

To prevent the Whistleblowing System Manager from facing one of the situations listed below in connection with a specific violation report:

- i. he/she is hierarchically or functionally a subordinate of the party subject of the violation report;
- ii. he/she is the alleged perpetrator of the violation; or
- iii. he/she has a potential interest related to the violation report that could compromise his/her impartiality and independent judgment;

an **Alternative Manager** shall be available who can be contacted when the Whistleblowing System Manager is faced with one of the potentials “conflict of interest” situations listed above.

In the conflict of interest situations listed above, the Alternative Manager shall perform all of the tasks incumbent upon the Whistleblowing System Manager in the violation report management phase; the Alternative Manager can be activated directly by the whistleblower, when sending the violation report, or by the Whistleblowing System Manager during the violation report’s preliminary assessment phase. To send a report directly to the Alternative Manager, simply select the Company and the "Alternative Manager" option ("company name - Alternative Manager") from the drop-down menu, then proceeding to complete the report as indicated above.

6.6.2 EXTERNAL ALTERNATIVE CHANNEL

There is always the possibility for the whistleblower to report also through the use of the following external reporting channels:

- at the National Anti-Corruption Authority (ANAC - www.anticorruzione.it) which activates an external reporting channel which guarantees, also through the use of encryption tools, the confidentiality of the identity of the reporting person, of the person involved and of the mentioned in the report, as well as the content of the report and related documentation;
- through *Public Disclosure* or by making information on violations publicly available through the press or electronic means or in any case through means of diffusion capable of reaching a large number of people;
by *reporting to the judicial or accounting authority*.

As a priority, the use of the internal channel is favored, and only when one of the following conditions is met is external reporting possible:

- a) the mandatory activation of the internal reporting channel is not envisaged within the context of the whistleblower's work or this, even if mandatory, is not active or, even if activated, does not comply with the provisions of Article 4 of Legislative Decree 24/2023;
- b) the reporting person has already made an internal report pursuant to article 4 and it has not been followed up;
- c) the reporting person has reasonable grounds to believe that, if he were to make an internal report, it would not be followed up effectively or that the report itself could lead to the risk of retaliation;
- d) the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

6.7. REPORTING

The Whistleblowing System Manager shall draw up at least once a year a report on the results of its activities, for submission to the administration and control bodies jurisdictionally competent in each instance. This report shall contain aggregate information about “spiked” violation reports and the findings from activities carried out in relation to violation reports that were not “spiked. This report shall be approved by the jurisdictionally competent corporate bodies and made available to Cerved Persons through publication on the Company intranet.

6.8. INFORMATION FLOWS REGARDING SIGNIFICANT VIOLATION REPORTS

The Whistleblowing System Manager shall promptly inform the corporate and control bodies of the Group companies affected by the violation report:

- 1) whenever, within the framework of the phases described above, he/she becomes aware of a Significant Violation Report;
- 2) whenever the Whistleblowing System Manager is hierarchically or functionally a subordinate of the party subject of the violation report, he/she is the alleged violator or has a potential interest related to the violation report such that it could compromise his/her impartiality and independent judgement, the handling of the violation report must therefore be entrusted to the Alternative Manager mentioned in Section 6.1 *supra*.

6.9. DISCLOSURE TO THE PARTY SUBJECT OF A VIOLATION REPORT

During all stages of report management, the Whistleblowing System Manager assess how the party subject of a violation report can be informed of the transmission of a report that concerns him/her, of the claimed violation, of the progress of the relative proceedings and the outcome of the corresponding proceedings.

Specifically, the time when a party subject of a violation report should be made aware of the report shall be determined on a case-by-case basis, verifying whether the transmission of this disclosure could be prejudicial for the performance of the investigation necessary to verify the facts subject of the violation report or whether, instead, the involvement of the party subject of the violation report is necessary for the development of the investigation.

In any event, Cerved shall guarantee the right of the party subject of the violation report to defend himself/herself and be informed (within a reasonable timeframe) of the accusations and any disciplinary measures against him/her.

6.10. PRIVATE INTEREST AND CO-RESPONSIBILITY OF THE WHISTLEBLOWER

The whistleblower shall declare whether he/she has a private interest related to the violation report.

If the whistleblower is jointly responsible for the reported violations, a mitigation of the disciplinary measures shall be applied in his/her favor, proportionate to the contribution provided by the violation report towards the discovery and/or prevention of the abovementioned violations.

The Whistleblowing portal has therefore been configured so as to enable the whistleblower to disclose: (i) the existence of a private interest in relation to the violation report; and (ii) the whistleblower's possible co-responsibility in relation to the acts or facts subject of the violation report.

6.11. REVEALING THE WHISTLEBLOWER'S IDENTITY¹⁶

Reports cannot be used beyond what is necessary to adequately follow up on them.

The identity of the reporting person and any other information from which it can be inferred, directly or indirectly, this identity cannot be disclosed, without the express consent of the reporting person himself, to persons other than those competent to receive or follow up on the reports, expressly authorized to process such data¹⁷.

Said consent is acquired through a request made by the System Manager (with a written explanation of the reasons behind the disclosure of the confidential data in question) through the communication channel provided within the application so that the confidentiality of the information and anonymity are always guaranteed until consent is given. In the case of reports made through the alternative internal channels, the whistleblowers will be informed that the reports will be reported within the digital reporting channel and handled through that channel so that they can interact with the reporter, including acquiring consent to the disclosure of his or her identity, in a confidential manner and protecting his or her identity.

¹⁶ Within the framework of criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and to the extent provided for in Article 329 of the Code of Criminal Procedure. Within the framework of proceedings before the Court of Auditors, the identity of the reporting person may not be disclosed until the close of the investigation phase.

¹⁷ Legislative Decree 24/2023 – Chapter II Article 12 c. 2: pursuant to articles 29 and 32, paragraph 4, of regulation (EU) 2016/679 and article 2-quaterdecies of the code regarding the protection of personal data referred to in legislative decree 30 June 2003, n. 196.

Within the scope of disciplinary proceedings, the identity of the whistleblower may not be disclosed, where the allegation of the disciplinary dispute is based on investigations that are separate and additional to the report, even if consequent to it.

If the dispute is based, in whole or in part, on the report and knowledge of the identity of the whistleblower is indispensable for the defense of the accused, the report will be usable for the purposes of disciplinary proceedings only if the reporting person expressly consents to the disclosure of his or her identity. Said consent will be acquired in the manner indicated above.

Notice shall be given to the whistleblower by written communication of the reasons for the disclosure of confidential data even when the disclosure of the identity of the reporting person is also essential for the defense of the person involved.

The protection of the identity of the persons involved and of the persons mentioned in the report must be guaranteed until the conclusion of the proceedings initiated on account of the report, in compliance with the same guarantees provided for in favour of the whistleblower.

The Involved Person may be heard, or, at his or her request, shall be heard, also by the acquisition of written observations and documents.

6.12. PROCESSING OF PERSONAL DATA

The processing of personal data (understood as data relative to identified or identifiable natural persons, in this instance the whistleblower, in the event of named reports, and the reported person, or the people involved) acquired in the context of the management of a report pursuant to this procedure shall be processed in compliance with the Privacy legislation, notably the EU Reg. 679/2016 ("GDPR") and Italian Legislative Decree 196/2003 as amended and integrated ("Privacy Code").

For further details on the processing of data relating to the Cerved Group companies based in Greece and Romania, see the respective appendices no. 1 and no. 2.

The interested parties, i.e. both the whistleblower and the persons involved, are provided with suitable information pursuant to articles 13 and 14 of the GDPR also through the Privacy Information available at the web address of the digital reporting channel and, for Cerved employees and collaborators, on the company intranet.

The interested parties are guaranteed within the limits of the provisions of art. 2-undecies, paragraph 1, lett. f), of the Privacy Code.

The personal data will be processed in compliance with the fairness principle and with the principles of the processing and minimization of data, as a result of which the data are not suitable for the processing of a specific report or inadequate, not pertinent or exceeding the scope foreseen by this procedure will be immediately deleted.

Further details are also indicated in the Privacy notice available at the web address of the digital reporting channel.

Cerved has envisaged interaction with the DPO in the drafting of this procedure, in any support for the management of the rights of the interested parties in this matter, and in all cases which, in application of this procedure, the processing of personal data is considered that may have a considerable impact on the data subjects concerned, as well as in all those cases where there is a high probability of their rights being at risk.

7. Adoption of the Procedure and Information to Its Intended Recipients

This Procedure shall have the maximum dissemination possible. To that effect, it was:

- approved by the Board of Directors of Cerved Group S.p.A. and is being adopted by each Group company through a resolution by their Board of Directors (or the corresponding corporate body/function/role);
- published on the Company website and intranet; and
- communicated to the whistleblowers through the Whistleblowing portal.

The abovementioned parties shall ensure, for issues under their jurisdiction, the updating of the delivery or transmission of this Procedure in connection with employee turnover and/or changes in the company's ownership structure.

The Human Resource function of the Cerved Group shall make sure, for issues under its jurisdiction, that the modalities to access this Procedure are communicated to all Employees upon hiring.

8. Support and Assistance

For any question, doubts, clarification, or advice concerning this Procedure, Cerved Persons shall always contact the Whistleblowing System Manager or the Anticorruption Function (in case both roles are not assigned to the same person), who are at their disposal to provide all necessary support.

All assistance requests may also be submitted through the Digital Whistleblowing Channel or via email to the email inbox of the Whistleblowing System Manager mentioned in Section 6.1 *supra* or through the dedicated telephone line.

9. Traceability of the Violation Report Management Process

The violation reports received (together with any annexed documents), shall be stored in the IT archive of the Whistleblowing web portal.

In general, when using alternative internal channels, all the documentation produced and collected as part of the report will be kept on file in special dedicated areas, with access restricted exclusively to the Whistleblowing System Manager; access to said areas is not allowed to any other company personnel.

Reports and related documentation are retained for the period of time necessary to process the report and in any case no later than five years from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations.

10. Procedure Updates

The System Manager shall periodically review this Procedure to ensure that it is effective over time and is consistent with best practices, recommending any improvements or additions when they seem necessary. The Legal and the Human Resource function shall always be included in the revisions process to ensure that the content of this document is always aligned with the most recent legislation, including issues concerning labor laws.

11. Romanian Appendix (Appendice 1)

Law no. 361/2022 provides the general framework on the protection of persons who report violations of the law, which have occurred or are likely to occur within the authorities, public institutions, other legal persons governed by public law, as well as within legal persons governed by private law, providing the procedure for receiving, examining and resolving reports, as well as the rights and obligations of persons submitting reports or publicly disclosing information on violations of the law, their protection measures, the obligations of authorities, public institutions and other legal persons governed by public law, as well as those of legal persons governed by private law, the rights of the persons concerned and the responsibilities of the competent authorities.

The appendix is applicable to Cerved Romanian companies: Re Collection S.R.L., Cerved Credit Collection S.p.A. (the offices in Romania) and Cerved Property Services S.A.

Whistleblower System Manager

Re Collection S.R.L., Cerved Credit Collection S.p.A. (the offices in Romania) and Cerved Property Services S.A. named a person operating in Romania, member of the *Compliance and Quality Assurance* function, that will act as Whistleblowing System Manager in coordination with Cerved Group Whistleblowing System Manager as part of the activities related to the whistleblowing reporting management process.

If you are based in Romania and wish to raise a concern, these country specific provisions apply to you in addition to the main Whistleblowing Procedure of Cerved Group.

WHO THIS PROCEDURE APPLIES TO

Whistleblowers can be:

I. Persons who have obtained in the framework of their work with Re Collection S.R.L., Cerved Credit Collection S.p.A. (the offices in Romania) and Cerved Property Services S.A. information regarding the breaches they report, importantly:

- a. workers;
- b. persons having self-employed status, within the meaning of Article 49 TFEU;
- c. shareholders and persons belonging in the administrative, management or supervisory bodies of the company, including non-executive members, as well as volunteers and paid or unpaid trainees;
- d. any person working under the supervision and direction of contractors, subcontractors, and suppliers.

II. Persons who wish to report information on breaches obtained in the framework of their employment with Re Collection S.R.L., Cerved Credit Collection S.p.A. (the offices in Romania) and Cerved Property Services S.A. which has ended (for any reason, including retirement), as well as persons whose employment relationship with Re Collection S.R.L., Cerved Credit Collection S.p.A. (the offices in Romania) and Cerved Property Services S.A. has not yet begun, where information on breaches has been acquired during the recruitment process or during other precontractual obligations.

WHAT VIOLATIONS THIS PROCEDURE APPLIES TO

This Procedure is applicable to violation reports concerning:

- a. breaches falling within the scope of EU law that concern the following areas: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transport safety; (v) protection of the environment; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health and welfare; (viii) public health; (ix) consumer protection; and (x) protection of privacy and personal data, and security of network and information systems;
- b. breaches affecting the financial interests of the EU as referred to in Article 325 TFEU and as further specified in relevant EU measures; and
- c. breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of EU competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law, which represent disciplinary violations, misdemeanors or offenses, or which are contrary to the object or purpose of the law;

ANONYMOUS VIOLATION REPORTS

Our companies provide the option of filing a violation report anonymously and shall be examined and resolved to the extent that it contains indications of violations of the law.

ACCEPTANCE OF A VIOLATION REPORT AND ASSESSMENT

- a. **Step one: The Whistleblowing System Manager will acknowledge your violation report within 7 days.**

The Whistleblowing System Manager will acknowledge the receipt of the violation report within seven (7) days of receipt.

b. Step two: Whistleblowing System Manager's actions.

Once a violation report has been made, the Whistleblowing System Manager will either forward the violation report to the competent team of the company or the competent entity (e.g., competent authorities) for further actions, or will terminate the procedure, in case the report is unintelligible, or abusive, or does not include facts constituting a breach of EU law, or there are no serious indications of such breach.

Please note that the Whistleblowing System Manager may contact you for any further information which might be needed regarding your report. The whistleblower has 15 days to submit the requested information.

c. Step three: Whistleblowing System Manager will provide you with feedback.

The Whistleblowing System Manager will provide you with information regarding the actions taken within a reasonable timeframe, which shall not exceed three (3) months from the receipt of the violation report or from the deadline for acknowledging the receipt.

PROCESSING OF PERSONAL DATA

Any processing of personal data carried out pursuant to this law, including the exchange or transmission of personal data by the competent authorities, shall be carried out in accordance with Regulation (EU) 2016/679 and Law no. 363/2018, as well as the provisions of Regulation (EU) 2018/1.725.

Personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

EXTERNAL REPORTING

External reports can be submitted directly to the National Integrity Agency ("NIA"), which is the competent authority to receive, manage and follow up on them.

Reports can be made in writing, orally by telephone or request a face-to-face meeting with the person appointed by the NIA, or through the electronic platform of the NIA.

If you submit a report to the NIA, the NIA will acknowledge the receipt of the report within seven (7) days of receipt, unless you specifically require otherwise or in case the NIA considers that such receipt will put at risk the confidentiality of your identity.

12. Greece Appendix (Appendice 2)

With Law 4990/2022 (Government Gazette A' 210/11.11.2022) (hereinafter, the "Law"), the major issue of the protection of the persons who report breaches of Union law is addressed. Specifically, persons who work for a public or private organization or are in contact with such an organization in the context of their work-related activities are often the first to know about threats or harm to the public interest which arise in that context. The purpose of this Law is the establishment of a unified protection framework for persons reporting breaches of Union law, as well as the transposition of the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (L 305).

If you are based in Greece and wish to report violations, these country specific provisions apply to you in addition to the main Whistleblowing Procedure of Cerved Group.

WHO THIS PROCEDURE APPLIES TO

Whistleblowers can be:

I. Persons who have obtained in the framework of their work with Cerved Greece information regarding the breaches they report, importantly:

- a. employees (full or part-time, indefinite or fixed term, posted, etc.);
- b. self-employed persons, consultants and home workers;
- c. shareholders and persons belonging in the administrative, management or supervisory bodies of the company, including non-executive members, as well as volunteers and paid or unpaid trainees;
- d. any person working under the supervision and direction of contractors, subcontractors, and suppliers.

II. Persons who wish to report information on breaches obtained in the framework of their employment with Cerved Greece which has ended (for any reason, including retirement), as well as persons whose employment relationship with Cerved Greece has not yet begun, where information on breaches has been acquired during the recruitment process or during other precontractual obligations.

WHAT VIOLATIONS THIS PROCEDURE APPLIES TO

This Procedure is applicable to violation reports concerning:

- a. breaches falling within the scope of EU law that concern the following areas: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering

and terrorist financing; (iii) product safety and compliance; (iv) transport safety; (v) protection of the environment; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health and welfare; (viii) public health; (ix) consumer protection; and (x) protection of privacy and personal data, and security of network and information systems;

- b. breaches affecting the financial interests of the EU as referred to in Article 325 TFEU and as further specified in relevant EU measures; and
- c. breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of EU competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.

ANONYMOUS VIOLATION REPORTS

Cerved provides the option of filing a violation report anonymously, but the whistleblower should note that in case of an anonymous report if they are not identified at a later stage, they could not be protected under the Law.

ACCEPTANCE OF A VIOLATION REPORT AND ASSESSMENT

- a. Step one: The Whistleblowing System Manager will acknowledge your violation report within 7 days.**

The Whistleblowing System Manager will acknowledge the receipt of the violation report within seven (7) working days of receipt.

- b. Step two: Whistleblowing System Manager's actions.**

Once a violation report has been made, the Whistleblowing System Manager will either forward the violation report to the competent team of Cerved or the competent entity (e.g., competent authorities) for further actions, or will terminate the procedure, and inform the Whistleblower, in case the report is unintelligible, or abusive, or does not include facts constituting a breach of EU law, or there are no serious indications of such breach.

Please note that the Whistleblowing System Manager may contact you for any further information which might be needed regarding your report.

- c. Step three: Whistleblowing System Manager will provide you with feedback.**

The Whistleblowing System Manager will provide you with information regarding the actions taken within a reasonable timeframe, which shall not exceed three (3) months from the receipt of the violation report or from the deadline for acknowledging the receipt.

PROCESSING OF PERSONAL DATA

The personal data processed in the context of a violation report pursuant to this Procedure shall be processed in compliance with the EU Reg. 679/2016 (“GDPR”), Greek law 4624/2019, the regulatory acts and decisions of the Greek Personal Data Protection Authority and any additional legislation, at whatever level, including the opinions and guidelines produced by the WP29 and EDPB.

As a matter of exception from the general GDPR rules, according to the Law, Cerved will not inform the person concerned, the subject party or any third party mentioned in the violation report regarding their personal data processing and may not satisfy their relevant rights (right to access, rectification, erasure, etc.), for as long as necessary, in order to ensure that the whistleblowing process is carried out in accordance with the Law and the provisions of this Procedure.

Cerved adopts all necessary technical and organizational measures to ensure the protection of the rights and freedoms of persons involved in a violation report.

EXTERNAL REPORTING

External reports can be submitted directly to the National Transparency Authority (“NTA”), which is the competent authority to receive, manage and follow up on them.

You may also report a breach externally if you reasonably believe that your report cannot be managed properly by the Whistleblowing System Manager or if risk of retaliation exists.

Reports can be made in writing, orally by telephone or request a face-to-face meeting with the person appointed by the NTA, or through the electronic platform of the NTA, accessible to persons with disabilities too.

If you submit a report to the NTA, the NTA will acknowledge the receipt of the report within seven (7) working days of receipt, unless you specifically require otherwise or in case the NTA considers that such receipt will put at risk the confidentiality of your identity.