



INFORMATION ON THE WHISTLEBLOWING SYSTEM

The UFI Filters Group (“Group”), through its parent company UFI Filters S.p.A. (“UFI Filters”), VAT no. 00221810237, with its registered office at Via Europa 26, 46047, Porto Mantovano (MN), in compliance with its obligations under Legislative Decree 24/2023 (“Whistleblowing Decree”), implementing EU Directive 2019/1937, has established a procedure aimed at preventing and combating crimes or other behaviors that violate the law and/or its internal protocols, allowing individuals to make reports in accordance with the Whistleblowing Policy, accessible on its corporate website.

UFI Filters, as Data Controller, hereby provides this information notice pursuant to Article 13 of EU Regulation 679/2016 (GDPR) and applicable national implementing provisions, to disclose the methods by which it collects and processes the information and personal data provided under the reporting process.

The management of reports is carried out by the Whistleblowing Committee (“Committee”) appointed by the Board of Directors of the parent company UFI Filters, which may rely on the support of the corporate functions competent from time to time, and unrelated to the content of the report, and/or on specialized external consultants, who will provide full support to the Committee, allowing access to all systems, documents, and data related to the investigations, while ensuring the confidentiality of the information provided by the whistleblower.

Data subjects

The data subjects involved in the processing of personal data for the purposes and processing activities referred to in the following sections are the whistleblowers (in case the reports are not completely anonymous and the identity of the whistleblower can be determined) and the reported persons, namely:

- ✓ shareholders and persons entrusted with administrative, management, supervisory or representative functions;
- ✓ employees or workers with a permanent or temporary contract;
- ✓ interns and trainees;
- ✓ agency workers;
- ✓ self-employed workers;
- ✓ contractors;
- ✓ subcontractors;
- ✓ employees or contractors of suppliers;
- ✓ customers;
- ✓ volunteers;
- ✓ consultants and self-employed workers.

Types of data processed

The personal data collected and processed during the reporting process and the subsequent investigation and management phases include the identification and contact details of both the whistleblower and the subject of the report, any login credentials for the online reporting platform, information about the alleged conduct, and any additional data provided depending on the type of report submitted.

Depending on the reported facts, data belonging to special categories as defined in Article 9 (1) of the GDPR, as well as data relating to criminal convictions or unlawful acts pursuant to Article 10 of the GDPR, may also be collected.

Processing purpose

The purposes of the processing of personal data during the reporting process are as follows:



1. manage the reporting process, which includes the verification of reported facts, the initiation of investigations, the formulation of responses and the implementation of any corrective or supportive measures for whistleblowers, as well as the resolution of the whistleblowing reports and the preparation of related documentation;
2. comply with obligations established by laws, regulations, or national and/or EU legislation;
3. assert or defend UFI Filters's legal rights in legal proceedings and to ensure the effective management of the company, also through the implementation of internal policies and procedures.

Legal basis

Personal data are collected according to different legal basis applicable to each processing purpose:

- ✓ legal obligations incumbent on Data Controller (Article 6, par. 1, (c) GDPR) for the purposes described in points 1 and 2 of the previous paragraph. The processing of personal data for these purposes is considered mandatory to enable the Data Controller to comply with the relevant legislation;
- ✓ legitimate interest of the Data Controller (Article 6, par. 1, (f) GDPR) for the purposes indicated by point 3 of the paragraph "Processing purpose".

Processing methods

Personal data will be processed using manual and/or electronic tools suitable to ensure their security and confidentiality, and to prevent unauthorized access, disclosure, alteration, or theft of data, through the adoption of appropriate technical, physical, and organizational security measures, in compliance with the aforementioned legislation and related confidentiality obligations, and in any case, according to the purposes and methods described in this privacy notice.

In particular, the electronic tool adopted for the reporting procedure, namely the online portal "Trusty," is equipped with encryption tools aimed at guaranteeing confidentiality obligations and is owned by the external service provider Trusty AG, which acts as an independent Data Controller.

During the management of the received report, the data may be processed exclusively by members of the designated Committee and employees of corporate functions responsible for achieving the purposes indicated above, who have been authorized by the Data Controller and provided with adequate operational instructions to ensure the complete confidentiality of the personal data collected.

It is also possible to submit a report anonymously. If the whistleblower chooses to do so, the Data Controller will ensure anonymity, and the identity of the whistleblower will only be disclosed with their consent or in cases required by law.

Storage times

Personal data provided through the reporting procedure will be processed for the time strictly necessary to achieve the purposes stated above. In any case, personal data will be retained for 5 years from the date of notification of the final outcome of the reporting procedure, unless a longer retention period is required for any litigation, requests by competent authorities or to comply with applicable law.

Communication and transfer

For the purposes mentioned above, personal data may be disclosed to other companies within the Group of which UFI Filters is the parent company, as well as to competent persons and/or authorities, also for the purposes of carrying out investigations and/or subsequent judicial proceedings that may be initiated following the verifications carried out within the reporting procedure.

Data may be processed exclusively by members of the Committee, as well as by employees of the corporate functions responsible for pursuing the purposes described above, who have been authorized by the Data Controller to process the



data and have received appropriate operational instructions, with particular reference to the adoption of security measures, in order to ensure the confidentiality and security of personal data.

Within the scope of the aforementioned purposes and depending on the location, particularly of servers, belonging to Group companies or third parties, data may also be transferred outside the EU, in compliance with adequacy decisions (Art. 45 GDPR), or with appropriate or suitable safeguards by the EU Commission (Art. 46 GDPR), or otherwise in accordance with applicable provisions (Art. 49 GDPR). To obtain a copy of such safeguards or informations on where they have been made available, please write to privacy@it.ufifilters.com.

Data subject's rights

The data subject, in relation to the processing of their personal data, has the right to exercise certain rights (Articles 15-22 of the GDPR), including the right to lodge a complaint with the supervisory authority, namely the Italian Data Protection Authority, located in Rome, Piazza Venezia, 11.

Notwithstanding the foregoing, pursuant to Article 2-undecies of the Italian Privacy Code and Article 12 of the Whistleblowing Decree, the above-mentioned rights (Articles 15-22 of the GDPR) may not be exercised if the exercise of such rights could result in actual and concrete harm to the confidentiality of the identity of the person reporting a violation, which they became aware of due to their employment relationship with the Group or the functions performed for it. Furthermore, if there is a concrete risk that the disclosure of the requested information through the exercise of such rights could compromise ongoing investigations or, more generally, the management of the report, the response to the data subject will be provided only after such risk has ceased.

In any case, the reported person shall not have access to the identity of the whistleblower but only to the substance of the report.

To exercise these rights, as well as for any privacy-related request, the data subject may send a registered letter with return receipt to UFI Filters S.p.A., Via Europa, 26, 46047 Porto Mantovano (MN), or alternatively send an email to: privacy@it.ufifilters.com.

UFI FILTERS SPA

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