POLICY ON THE REPORTING OF MISCONDUCT
– Whistleblowing Policy

MAKING WATER EASY

2026

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00 **Introduction and definitions**

DAB Group has always been committed to promoting a **healthy working environment** that is **open to dialogue**, in line with the values set out in our Code of Conduct. It is therefore important to us that any **actual or suspected violation** within the organisation is **reported, investigated and resolved** as quickly as possible.

This Policy explains when and how to **make a report**, **what matters may be reported** and through which **channels**.

This Policy defines the Group's **minimum principles on whistleblowing** and is applied in compliance with the national laws applicable from time to time in the jurisdictions in which the Group operates. For Italian companies in particular, **Directive (EU) 2019/1937**, as implemented by Legislative Decree No. 24 of 10 March 2023, and the relevant provisions issued by ANAC apply.

This Policy applies to individuals who, in the course of their work, professional or functional activities, come into contact with DAB and report information on breaches pursuant to applicable whistleblowing laws, including, by way of example and without limitation, **employees**, salaried and **self-employed workers**, **candidates**, **former employees**, **trainees**, **volunteers**, **consultants**, **contractors**, **suppliers**, **business partners**, **shareholders**, as well as persons performing **administrative, management, supervisory, oversight or representative functions**. **The protections** provided under this Policy also extend, within the limits and under the conditions established by law, to **facilitators** and other persons connected with the **reporting person**. For the purposes of this Policy, "DAB" means all companies within the **DAB Group**, namely the subsidiaries and investee companies held by **DWT Holding S.p.A.**, unless the context requires reference to a specific Group company.

DEFINITIONS

REPORT

any communication made in accordance with the procedures set out in this Policy concerning information on breaches, unlawful conduct, irregularities, acts or omissions relevant under applicable whistleblowing laws, European Union law, applicable national laws and/or DAB Group policies and procedures. Where the Internal Channel is also used for ethical or compliance reports falling outside the strict scope of whistleblowing legislation, the specific legal protections provided by whistleblowing laws shall apply only in the cases and within the limits established by applicable law.

REPORTING PERSON

the natural person who makes a report or public disclosure of information on breaches acquired in a work-related, professional or functional context.

FACILITATOR

a natural person who assists the Reporting Person in the reporting process, operates within the same work-related context and benefits from the protections provided by applicable law

CONCERNED PERSON OR REPORTED PERSON

the natural or legal person mentioned in the report as the person to whom the breach is attributed or who is otherwise implicated in the reported facts.

RETALIATION

any conduct, act or omission, including an attempted or threatened act, carried out as a result of the report, external report or public disclosure and capable of causing, or actually causing, directly or indirectly, unjust harm to the Reporting Person or other protected persons.

INTERNAL CHANNEL

the reporting channel, or set of reporting channels, established by the DAB Group for the receipt and handling of reports pursuant to this Policy and applicable law.

EXTERNAL CHANNEL

the reporting channel established by the competent authority under applicable law, including, for Italy, the external channel managed by ANAC.

PUBLIC DISCLOSURE

the making available of information on breaches in the public domain, in the manner and under the conditions provided by applicable law.

FOLLOW-UP

any action taken by the Ethics Committee or by the competent functions to assess the merits of the reported facts, carry out checks, adopt corrective measures, promote disciplinary or organisational action and close the handling of the report.

ETHICS COMMITTEE

the body formally entrusted, at Group level, with the receipt, assessment and handling of reports submitted through the Internal Channel, as well as with coordinating follow-up activities, in compliance with the principles of autonomy, impartiality, confidentiality and absence of conflicts of interest.

01 **Purpose of the policy**

The purpose of the reporting system is to enable the **timely emergence, identification and prevention** of actual or suspected breaches.

Likewise, the reporting system enables reports to be submitted **securely** and **confidentially** to the **Ethics Committee**, which is the body responsible for managing the **Internal Channel**. The reporting system is also intended to ensure effective **protection against retaliation** or other unfavourable treatment resulting from a report, within the limits and under the conditions laid down by applicable law.

02 **The reporting person and applicable protections**

2.1 PERSONS WHO MAY MAKE A REPORT

A Reporting Person is a natural person who **reports** information, including a reasonable suspicion, concerning an **actual or potential breach** of which he or she has become aware in connection with his or her **work-related, professional or functional context**.

By way of example, the following persons may qualify as Reporting Persons:

- current, prospective or former employees;
- trainees;
- members of the board of directors;
- business partners (for example, suppliers and consultants); and
- self-employed workers carrying out activities on behalf of DAB.

2.2 PROTECTIVE MEASURES FOR THE REPORTING PERSON

The Reporting Person is first and foremost **protected against the disclosure** of information concerning his or her **identity**, or any information from which that identity may be inferred. This means that, as a rule, such information may be disclosed outside the Ethics Committee only with the Reporting Person's **express consent**, except where otherwise required by law.

In addition, the **Reporting Person** may not be held liable for disclosing **confidential information** in connection with a report or a public disclosure if he or she had **reasonable grounds** to believe that such disclosure was necessary to reveal a breach. When assessing such necessity, particular attention must be paid to the nature of the information and to whether the Reporting Person acted in the legitimate interest of **safeguarding integrity**, whether his or her own or that of others, within the limits provided by law.

Furthermore, the Reporting Person may not be held liable for acquiring or accessing unauthorised information, provided that such acquisition or access does not in itself constitute a separate criminal offence.

A Reporting Person who has submitted a report concerning an actual or potential breach is **protected against retaliation**, including demotion, dismissal or other detrimental treatment resulting from the report. Such protection also extends, where provided by law, to persons connected with the Reporting Person who may suffer retaliation in a work-related context, such as, by way of example, colleagues, family members, or entities owned by or otherwise linked to the Reporting Person.

Such protection is subject to the Reporting Person having had reasonable grounds to believe, at the time of reporting, that the reported facts were true and that the information fell within the scope of whistleblowing legislation.

03 **Subject matter of reports**

Through the DAB Group's **whistleblowing systems**, it is possible to **report breaches, acts or omissions that harm the integrity** of the Group or any of its companies, as well as unlawful or irregular conduct relevant under applicable whistleblowing legislation, European Union law, applicable national laws in the countries in which the Group operates, and the Group's internal policies and procedures.

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breaches of European Union law and of national laws implementing or giving effect to it, in the matters relevant under applicable whistleblowing legislation, including, by way of example, public procurement, financial services, prevention of money laundering and terrorist financing, product safety and compliance, transport safety, environmental protection, public health, consumer protection, personal data protection, security of network and information systems, protection of the financial interests of the European Union, and the proper functioning of the internal market;

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breaches of laws, regulations, authorisations, professional obligations or decisions of competent authorities applicable in one or more jurisdictions in which the DAB Group operates, including, by way of example, conduct that may constitute criminal offences, administrative offences, fraud, corruption, embezzlement, document forgery, tax, accounting, customs, competition, export control or international sanctions violations, occupational health and safety breaches, environmental breaches, labour rights infringements or personal data protection violations;

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serious breaches of the Code of Conduct, Model 231, global or local policies and internal procedures of the DAB Group, including conduct capable of causing financial, legal, reputational or compliance harm to the Group, including where such conduct occurs in cross-border contexts or involves more than one Group company;

As a rule, complaints, claims or requests relating to the Reporting Person’s personal interest and concerning exclusively his or her individual employment or collaboration relationship, as well as ordinary interpersonal issues or personnel management matters lacking legal, ethical or compliance relevance, do not fall within the scope of this Policy. However, reports concerning such matters remain admissible where they concern or reveal breaches of law, the Code of Conduct, Model 231, Group policies or other conduct capable of causing significant harm to the DAB Group or any of its companies.

Where a report falls outside the whistleblowing perimeter, the Reporting Person may, where appropriate, be directed to the competent corporate channels, including management, Human Resources, the Legal Team or the relevant local functions, it being understood that the specific protections provided by whistleblowing legislation shall apply only where the legal conditions are met.

04 **Reporting channels and methods**

In line with **Directive (EU) 2019/1937** and with the national laws implementing or giving effect to it in the jurisdictions in which the Group operates, the DAB Group has strengthened its **reporting system** in order to ensure reliable, **confidential channels** that comply with applicable law. For Italian companies in particular, **Legislative Decree No. 24 of 10 March 2023** and the relevant provisions issued by **ANAC** apply.

A report may be made either internally or externally.

ETHICS COMMITTEE

By direct email to the Ethics Committee at the **dedicated addresses** ethics.dab@dwtgroup.com and **ethics.dwt@dwtgroup.com**, both referring to the same central Group function and available, subject to any overriding mandatory local provisions, to persons entitled to make reports under this Policy.

WHISTLEBLOWING PORTAL

Through the dedicated reporting channel: https://dab.integrityline.com

COMPETENT AUTHORITY

Through the external channel established by the competent authority, in the cases and under the conditions provided by applicable law.

We encourage initial reporting through the DAB Group's Internal Channel, as a breach can generally be addressed more quickly and effectively through that channel. In the event of a suspected breach of personal data protection rules, we encourage employees to promptly contact the Privacy Team at: data.protection@dabpumps.com. In any event, the possibility of using the whistleblowing channel remains unaffected, where the relevant conditions are met under applicable law and this Policy.

The EQS Integrity Line platform, used as the dedicated reporting channel, is provided by EQS Group AG.

4.1 REPORTING THROUGH THE INTERNAL CHANNEL

Reports submitted through the above-mentioned email addresses or through the DAB Group's **Internal Channel** are received and handled, at Group level, by the **Ethics Committee**, which is the body formally entrusted with the management of the Internal Channel under applicable law. This Internal Channel constitutes a single **Group-wide reporting channel** made available to all DAB Group companies and to persons entitled to make reports under this Policy, within the limits and under the conditions permitted by applicable law and without prejudice to the adoption, where necessary or appropriate, of **local safeguards**, supplementary procedures or local addenda to address specific legal or organisational requirements of individual jurisdictions or legal entities. The Ethics Committee operates **autonomously, impartially and confidentially**, in compliance with the principles of independence, necessity, proportionality and data minimisation, as well as with the instructions and powers conferred upon it by a specific appointment deed or internal regulation.

In the event of any conflict between this Policy and overriding mandatory provisions of applicable local law, the latter shall prevail. Individual Group companies may therefore adopt, in line with the principles of this Policy, local procedures, annexes or organisational measures suitable to implement any specific legal or operational requirements.
The members of the Ethics Committee are selected on the basis of criteria designed to ensure their independence, integrity, professionalism, confidentiality and absence of conflicts of interest, including with respect to Group companies and the functions involved in the facts reported. The Ethics Committee must be placed in a position to operate with adequate resources, expertise and access to the information strictly necessary for the performance of its duties.

4.2 REPORTING THROUGH THE EXTERNAL CHANNEL

In addition to internal reporting, in the cases and under the conditions provided for by applicable law, a report may be made through **the external channel** established by the **National Anti-Corruption Authority ("ANAC") or**, where applicable in other jurisdictions or for breaches of European Union law, through the **relevant competent external authority** or body. In particular, pursuant to Legislative Decree No. 24/2023, recourse to the ANAC external channel is permitted where at least one of the following conditions applies: (i) the Internal Channel, although mandatory, is not active or does not comply with legal requirements; (ii) the Reporting Person has already made an internal report and no follow-up has been given; (iii) the Reporting Person has reasonable grounds to believe that, if an internal report were made, it would not be effectively followed up or that the report could give rise to a risk of retaliation; (iv) the Reporting Person has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest.

Recourse to the External Channel must take place in compliance with the procedures, conditions and limits established by applicable law and by the instructions published by the competent authority. Where there is uncertainty as to the competent external authority, the Legal Team or the Ethics Committee may provide general guidance, it being understood that the decision to use the External Channel and the related assessment of admissibility remain governed by law.

4.3 PUBLIC DISCLOSURE OF BREACHES

Public disclosure of information on breaches benefits from the protections provided by whistleblowing legislation only in exceptional cases and under the conditions expressly laid down by law. In particular, pursuant to Legislative Decree No. 24/2023, such protection may apply where:

- the Reporting Person has previously made an internal report and an external report, or directly an external report where permitted, and no response has been provided within the applicable timeframe;

- the Reporting Person has reasonable grounds to believe that the external report may expose him or her to a risk of retaliation or may not be effectively followed up, including in light of the specific circumstances of the case.

- The whistleblower has reasonable grounds to believe that reporting the matter externally could result in retaliation or might not be effectively addressed, including in view of the specific circumstances of the particular case.

It is understood that, whether in the case of an internal or external report or in the case of public disclosure, the protective measures and safeguards granted to the Reporting Person apply only where the conditions and requirements established by applicable law are met, including the existence of reasonable grounds to believe that the information on the reported or disclosed breaches was true at the time of the report or disclosure and fell within the material scope of whistleblowing legislation.

05 **Governance and handling of reports**

5.1 GROUP-LEVEL HANDLING OF REPORTS

All reports submitted through the DAB Group's **Internal Channels**, which constitute a single Group-level reporting system, are subject to a preliminary a**dmissibility assessment by the Ethics Committee**, which verifies whether they fall within the scope of this Policy, whether the facts described are sufficiently specific and whether urgent protective or risk-containment measures need to be adopted.

Where a report is deemed admissible, the **Ethics Committee** initiates the appropriate **verification and investigation activities**, either directly or by involving, to the extent strictly necessary, competent corporate functions or external professionals bound by **confidentiality obligations** (investigation team). The involvement of other Group functions, such as **Legal, Human Resources, Internal Audit, Finance, IT, Privacy or Security**, takes place solely on a need-to-know basis and in compliance with roles, competencies and the absence of conflicts of interest.

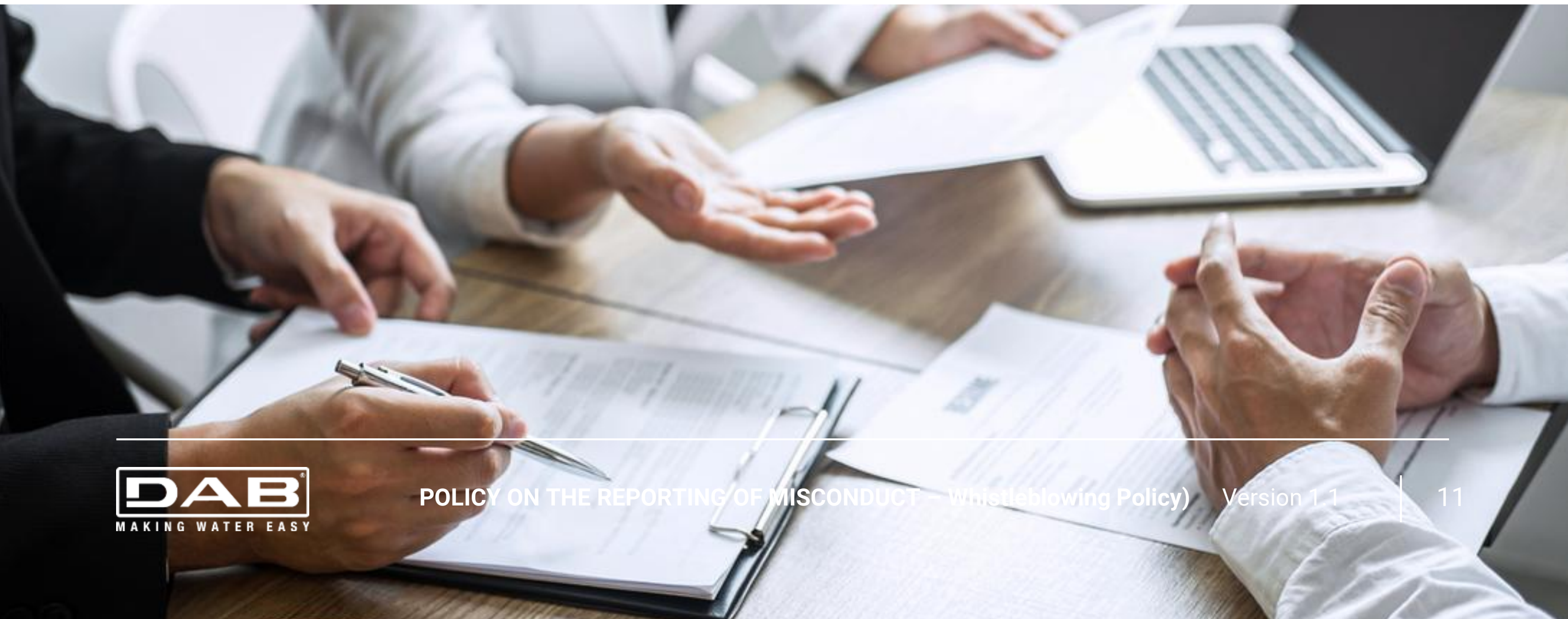
Where relevant for the purposes of **Model 231** or supervisory responsibilities, strictly pertinent information may be shared with the **Supervisory Body** in a manner designed to preserve the confidentiality of the Reporting Person and the other persons involved.

Investigations may be carried out with the support of one or more competent internal resources or specially appointed external advisers, acting as authorised persons or processors, depending on their role, and bound by confidentiality obligations and, where applicable, by specific instructions on the processing of personal data. The outcomes of the investigation activities are formalised in a report or investigation memorandum containing the main checks carried out, the findings and any recommendations or proposed corrective measures.

Based on the investigation findings, the Ethics Committee assesses whether the report is well founded and determines, within the respective areas of responsibility, the follow-up actions, corrective measures and any reporting lines to the competent corporate bodies or functions.

Where disciplinary, organisational, legal, accounting, security or compliance measures are required, the Ethics Committee may involve, to the extent strictly necessary and in compliance with confidentiality requirements, Group Management, Human Resources, the Legal Team, the Supervisory Body, the management of the company concerned or other relevant functions. In the case of reports specifically concerning one or more Group companies, the Ethics Committee coordinates the handling process centrally and involves, on a need-to-know basis and within the limits permitted by applicable law, the functions or contacts of the individual legal entity concerned solely to the extent necessary for carrying out the investigations, adopting corrective or disciplinary measures and implementing any local requirements. Any such involvement must be justified, traceable and limited to information relevant to the purpose pursued.

Implementation of any measures resulting from the report remains the responsibility of the corporate functions concerned from time to time, including, where relevant, Human Resources, the management of the company concerned, the Legal Team, the Supervisory Body or other specialist functions, according to their respective roles, powers and responsibilities. It remains understood that the Ethics Committee retains overall coordination of the report-handling process until closure, monitors the implementation of the measures defined and ensures, where necessary, coordination between Group level and the company concerned, in compliance with the principles of confidentiality, proportionality, traceability and compliance with applicable local law.



5.2 MANAGEMENT OF CONFLICTS OF INTEREST AND SPECIAL SITUATIONS

Where a report directly or indirectly concerns one or more members of the **Ethics Committee**, members of **Group Management, directors or other persons who**, by reason of their role or functions, **could interfere with the proper handling of the case**, such persons are excluded from any investigative, decision-making or information-related activity concerning the report. In such cases, the Group adopts appropriate **escalation and replacement measures**, including through the involvement of non-conflicted members, independent functions or external advisers, in order to ensure **impartiality**, continuity of the process and adequate **traceability** of the decisions taken.

06 **Timeframes, feedback and follow-up management**

Following the submission of a report, the Reporting Person is entitled to:

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receive confirmation of receipt of the report within seven (7) days of its submission;

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receive, within three (3) months from the acknowledgement of receipt or, in the absence of such acknowledgement, from the expiry of the seven (7)-day period following submission of the report, feedback on the follow-up given or intended to be given to the report, within the limits permitted by applicable law;

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receive, where compatible with applicable law, confidentiality requirements, investigative needs and the rights of the persons involved, information on the outcome of the procedure or on the measures taken following the report.

Where the Reporting Person has activated a secure mailbox, communications relating to the report will be sent through that channel. In the case of an anonymous report, the secure mailbox is the only means by which the Ethics Committee can provide acknowledgements of receipt, requests for clarification or feedback on the follow-up given to the report. If the anonymous Reporting Person chooses not to activate it, it will not be possible to guarantee further communications regarding the handling of the case.

6.1 REPORTING PROCESS TIMELINE – QUICK GUIDE

Below is a simplified summary of the main stages of the report-handling process and the related timeframes.

SUBMISSION OF THE REPORT — DAY 0

The Reporting Person submits the report by email or through the dedicated channel.

ACKNOWLEDGEMENT OF RECEIPT — WITHIN 7 DAYS

The Ethics Committee acknowledges receipt of the report, where possible through the channel used by the Reporting Person.

PRELIMINARY ASSESSMENT — WITHIN 7 DAYS

The Ethics Committee checks whether the report falls within the scope of the Policy, contains sufficient details and requires urgent measures.

VERIFICATION AND INVESTIGATION — VARIABLE TIMEFRAME

Further reviews are carried out and, if necessary, the competent functions or external advisers are involved in compliance with confidentiality requirements.

INITIAL FEEDBACK TO THE REPORTING PERSON — WITHIN 3 MONTHS

The Reporting Person receives an update on the follow-up given or intended to be given to the report, within the limits permitted by law.

CASE CLOSURE AND RESULTING MEASURES — VARIABLE TIMEFRAME

Corrective, organisational, disciplinary or other measures permitted by applicable law may be adopted.

The timeframes indicated above are provided for information purposes and refer to the main steps of the process. The overall duration of the handling of a case may vary depending on the nature, complexity and seriousness of the reported facts, as well as on the need to carry out further inquiries or to involve competent functions and authorities, where applicable.

07 Confidentiality and anonymity

Reports are received and handled through arrangements designed to ensure the utmost **confidentiality** of the identity of the **Reporting Person**, the **Facilitator**, the **Reported Person**, **any other persons mentioned in the report**, as well as of the content of the report and the related documentation. Confidentiality is ensured throughout the entire handling process, except where disclosure of certain information is required or permitted by law or is strictly necessary for the handling of the report or for the possible initiation of disciplinary, civil, criminal or administrative proceedings.

Access to information relating to a report is permitted exclusively to authorised persons who have an actual need for it for purposes connected with receipt, assessment, investigation, follow-up or compliance with legal obligations, in accordance with the need-to-know principle. Such persons are subject to confidentiality obligations and, where applicable, to specific instructions on the processing of personal data. Any circulation of information must be limited to what is strictly relevant and proportionate to the purpose pursued.

The **Reporting Person** may also make a **report anonymously**, where permitted by the channel used. Anonymous reports are taken into consideration and handled to the extent that they are sufficiently detailed and allow reasonable checks to be carried out. Where anonymity is chosen by the Reporting Person, it is preserved throughout the handling of the case within the limits permitted by law and by the characteristics of the channel used. Should the identity of the anonymous Reporting Person subsequently become known and the legal conditions be met, the protective measures provided by applicable whistleblowing legislation shall apply.

Reports and the related documentation are stored with appropriate technical and organisational security measures and are accessible only to authorised persons for the time strictly necessary to handle the report and, in any event, in compliance with the retention periods established by applicable law and by the DAB Group's internal procedures. Where necessary, suitable measures are adopted to limit the dissemination, duplication or unauthorised consultation of information.

The identity of the Reporting Person and any other information from which it may be inferred may not be disclosed to persons other than those competent to receive or follow up on reports, except as provided by law. The safeguards, limits and rights provided by applicable personal data protection law, as further described in the Privacy Notice, also remain unaffected.

08 **Protections and safeguards for the reported person**

8.1 RIGHTS OF THE REPORTED PERSON

The **Reported Person** is informed of the allegations or circumstances concerning him or her at such time and in such manner as are compatible with **confidentiality requirements, investigative needs** and any obligations imposed by law.
Even where the Reported Person is informed, the identity of the Reporting Person — or any information from which it may be inferred — will not be disclosed, except in the cases expressly provided for by law.

The identity of the Reported Person and the information relating to him or her are treated confidentially throughout the handling of the case, without prejudice to what is necessary for the purposes of the investigation, the possible exercise of defence rights and any ensuing proceedings.

The Reported Person is granted the procedural safeguards and rights provided for by applicable law, in compliance with the principles of proportionality, confidentiality and the proper conduct of investigations and any ensuing proceedings.

The safeguards, limits and any restrictions on the exercise of rights under personal data protection legislation also remain applicable in relation to the Reported Person, in the cases and within the limits permitted by law and insofar as compatible with the protection of the Reporting Person's confidentiality, the proper conduct of investigations and the protection of the rights of other persons involved.

8.2 POSSIBLE CONSEQUENCES OF A REPORT

A report may give rise to **internal inquiries** and, where the relevant conditions are met, to the adoption of **disciplinary, organisational, civil, administrative or criminal measures** against the Reported Person or other persons involved. In particular, without prejudice to the assessment of the specific case and the application of the law, the applicable collective bargaining agreement, the disciplinary code, **Model 231, the Code of Conduct** and the applicable internal procedures, the DAB Group may adopt appropriate measures against any person who:

- carries out acts of retaliation or discrimination, including attempted or threatened acts, to the detriment of the Reporting Person or other protected persons;

- obstructs or attempts to obstruct a report, compromises its receipt, follow-up or proper handling;

- breaches confidentiality obligations relating to the identity of the Reporting Person, the Reported Person or other persons involved, or improperly discloses or uses information acquired in the course of handling the report;

- negligently or intentionally fails to cooperate with the investigation activities, where required within the scope of his or her functions; or

- engages in conduct contrary to this Policy or to the protective measures provided by applicable whistleblowing legislation. Where facts potentially relevant from a criminal or administrative perspective emerge, DAB may also involve the competent authorities within the limits and in the manner provided by law.

The Reporting Person is not involved in any decision-making process relating to the report, its handling or any consequences determined by the Ethics Committee.

8.3 UNFOUNDED, DELIBERATELY FALSE OR MISLEADING REPORTS

The protective measures provided for under this Policy apply where, at the time of the report or public disclosure, the **Reporting Person** had **reasonable grounds** to believe that the information on the reported breaches was true and fell within the scope of **whistleblowing legislation**. It is not required that the reported facts subsequently be established in every detail, provided that the report was made in **good faith** and on the basis of elements sufficient to justify, according to a standard of reasonableness, the Reporting Person’s suspicion or belief.

Reports made intentionally or in bad faith, as well as reports that are manifestly false, seriously misleading, pretextual or abusive, are excluded from protection and may give rise to the application of disciplinary measures or other consequences provided for by law, the applicable collective bargaining agreement, the disciplinary code and the applicable internal procedures, for example where they are submitted for defamatory, retaliatory or otherwise improper purposes. The mere fact that a report proves to be unfounded, or that the reported facts are not confirmed as a result of the checks carried out, does not in itself give rise to liability on the part of the Reporting Person or to the imposition of sanctions, provided that the report was made in the presence of the legal conditions and on the basis of reasonable grounds.

8.4 INDICATIVE EXAMPLES OF BREACHES AND POSSIBLE CONSEQUENCES

For illustrative purposes only and to facilitate understanding of this Policy, below are some recurring types of breaches, together with practical examples and a general indication of the possible consequences. The measures actually applicable are always determined on a case-by-case basis, taking into account the seriousness of the facts, intent or negligence, the role of the person involved, any repeated misconduct, the damage caused, the applicable law, the applicable collective bargaining agreement, the disciplinary code, Model 231, the Code of Conduct and the relevant internal procedures.

Criminal offenses and unlawful conduct

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Corruption involving public officials or suppliers; fraud; embezzlement; falsification of documents or corporate records	Disciplinary actions up to dismissal; reporting to competent authorities; individual criminal liability; potential corporate liability pursuant to Legislative Decree No. 231/2001

Violations of the Code of Conduct and Model 231

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Undisclosed conflicts of interest; improper offering/acceptance of gifts or benefits; conduct not aligned with the Group's ethical principles	Proportionate disciplinary sanctions; revocation of roles/delegations; formal warnings; additional internal measures as applicable

Breach of confidentiality

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Unauthorized disclosure of the whistleblower's identity; sharing case details with unauthorized persons; improper use of acquired information	Written warning, suspension, revocation of roles or authorizations, up to dismissal; possible civil, administrative, or criminal actions, where applicable

Health, Safety and Environment (HSE)

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Failure to implement safety measures; exposure of employees to risks; environmentally harmful practices	Disciplinary sanctions; suspension of activities; civil and criminal liability; immediate corrective actions

Malicious, bad faith or abusive reports

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Knowingly false, defamatory, retaliatory, or instrumental reports submitted to harm others	Exclusion from whistleblower protections; warning, suspension, up to dismissal in the most serious cases; possible legal actions to protect the Company or affected individuals

Harassment and inappropriate conduct

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Moral or sexual harassment; discrimination; intimidating or retaliatory behavior	Disciplinary sanctions up to dismissal; protective measures for victims; possible legal actions

Retaliation or discrimination against the whistleblower

EXAMPLE	POSSIBLE CONSEQUENCES / SANCTIONS
Demotion, exclusion from meetings or projects, worsening of duties, pressure or threats connected to the report	Verbal or written warning; more severe disciplinary measures up to dismissal in serious cases; possible legal actions or reporting to competent authorities

09 **Processing of personal data**

In the context of receiving, handling and investigating reports, DAB processes the **personal data** of the **Reporting Person**, the Reported Person and any other person who may be involved, in compliance with applicable personal **data protection laws** and **whistleblowing legislation**.
The processing is carried out for purposes connected with the receipt and handling of reports, the performance of checks, the adoption of any resulting measures and compliance with legal obligations, on the basis of the relevant lawful grounds provided by applicable law.

Personal data are processed in accordance with the principles of **lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, integrity and confidentiality**; they are accessible exclusively to authorised or otherwise entitled persons who have an actual need for them for the purposes indicated above and are processed using methods and technical and organisational measures suitable to ensure their **security**, confidentiality and protection against unauthorised access or disclosure. Data manifestly not useful for handling the report are not collected or, if collected incidentally, are deleted or anonymised without undue delay, where compatible with legal obligations and defence needs.

Data are retained for the period strictly necessary for handling the report and, in any event, no longer than the retention periods provided for by applicable law and by the DAB Group's internal procedures; once that period has expired, they are deleted, anonymised or otherwise processed in a manner that does not permit the identification of the data subjects, unless their further retention is necessary for the establishment, exercise or defence of a right in judicial proceedings or in order to comply with legal obligations.

Any limitations on the exercise of data subjects' rights provided for by applicable law remain unaffected, in particular where the exercise of such rights could cause actual and specific prejudice to the confidentiality of the Reporting Person's identity, the proper conduct of investigations or the protection of the rights of other persons involved. For further information on the processing of personal data, including the categories of data processed, the rights of data subjects and any applicable limitations, please refer to the Privacy Notice available on the reporting channel.

10 **Contacts and requests for clarification**

Any requests for clarification regarding this Policy may be sent to the Legal Team at: legal@dabpumps.com

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