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What is Whistleblowing?

Whistleblowing is the lawful disclosure of information a discloser reasonably believes evidences irregularities or situations of danger or risk that could harm the organization itself or third parties. Legislative Decree no. 24 of March 10, 2023, implementing Directive (EU) 2019/1937 on Whistleblowing, has introduced reporting channels and protections recognized for reporters in both the public and private sectors, including therefore PIR Group Companies.

Who Can Report a Violation?

Employees, former employees, and job candidates, shareholders, customers, partners, suppliers (including subcontractors), freelancers or collaborators, self-employed workers, or those with collaboration agreements, professionals, consultants, agents and intermediaries, volunteers, and interns (paid or unpaid)—in short, anyone with a legitimate interest in the business activities of the PIR Group.

What Protections are Guaranteed?

The confidentiality of the reporter's identity and all elements of the report is guaranteed. The reporter is also protected from any retaliatory measures, even if attempted or threatened, for individuals who come forward with reports, contributing to the identification and prevention of risks and situations prejudicial to the PIR Group Companies. In addition to protecting the identity of the reporter, the identity of individuals involved and mentioned in the report is also guaranteed.

When to Make a Report?

When aware of illicit conduct based on specific and consistent factual elements related to the work environment. The report may concern specific violations of national and EU laws and/or various illicit

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acts that harm public interest or the integrity of the PIR Group Companies. Not included among reportable violations are information clearly lacking in foundation, information already entirely public, as well as information acquired only based on rumors or unreliable sources. Before formally making a report, internal discussion with immediate superiors is suggested.

Who Receives the Report?

The PIR Group Companies have appointed an Internal Referee to receive all reports, who is previously authorized and will manage the reports with the support of the Supervisory Board of PIR S.p.A.

What Cannot Be Reported?

Disputes, claims, or requests related to the personal interests of the reporter. Reports of violations related to national security, as well as contracts related to defense or national security aspects.

What Are the Internal Channels for Making a Report?

The PIR Group Companies, in consultation with union representatives, have adopted an internal computerized channel called "Whistleblowing Platform Teseo ERM."

The platform allows the transmission of reports, including anonymous, written, and vocal reports, to authorized parties (report recipients).

The reporter can also request a direct in-person meeting within a reasonable time from the request.



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How to Make a Whistleblowing Report via the TESEO ERM Platform

1	To submit a report, start by accessing the dedicated section published on the PIR Group website (www.gruppopir.com). Follow the instructions provided after reviewing the privacy policy.
2	If you wish to make a written or vocal report, press directly on the " submit a report " button available on the main page of the platform. Then select the company to which you intend to send the report.
3	Proceed by confirming that you have read the two proposed disclaimers, and then choose the channel (written or vocal) you want to use to submit the report. Fill in the mandatory fields marked with (*). Where applicable, you also have the option to fill in non-mandatory fields. In any case, remember that the report must be detailed, indicating: <ul style="list-style-type: none">– the circumstances in which the reported incident occurred;– a description of the incident (even with evidence or the possibility to attach files);– elements that allow the identification of the subject to whom the reported facts should be attributed.
4	The written channel, in addition, will require your explicit consent: <ul style="list-style-type: none">– to provide, with the guarantee of full respect for privacy principles, your identifying information;– to communicate your identifying information (if provided) to persons other than those competent to receive and manage reports.
5	When the entered content is confirmed, you can proceed by pressing the " submit " button. At this point, the platform will issue a unique alphanumeric code (ticket) that you should note down, keep, and not disclose to third parties. This will be the only allowed and available way through which you can monitor the progress and responses of the person receiving the reports. The issuance of this ticket considers the deadline for notifying the receipt of the report as fulfilled.
6	You can monitor the progress of your report only through the issued ticket (whether you have provided your identity or not), by entering it directly on the main page of the platform and pressing the " Access " button.
7	Within three months from the issuance of the ticket, you will receive the outcome of your report.
8	The data and information present in the platform will be archived and stored for the period provided by the regulations, which is 5 years.

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Functional diagram of reporting

RECEIPT NOTIFICATION



Report

**Preliminary
inquiry**

Investigation

Decision

Answer

Action

**REPLY WITHIN 3 MONTHS OF
RECEIPT NOTIFICATION**

Summary

- PIR Group promotes the process with respect for the integrity and protection of the reporter.
- PIR Group is committed to protecting the privacy of all involved parties.
- Reports are securely archived within the platform.
- All reports undergo a preliminary investigation; you may be contacted for further details by authorized parties.
- The report remains confidential.