Innovating Special nutrition. DrSchär

FORM FOR REPORTING MISCONDUCT - WHISTLE-BLOWING

Preliminary Information

Do you want to report a misconduct? Please be aware that:

1 - you must use the company's whistle-blowing channel to submit your report;

2 – duplicates of the same report may not be submitted;

3 - reports made without filling in the complainer's details or anonymously are treated as ordinary reports. If sent anonymously, they may subsequently be added with the identity of the complainer for the purposes of possible legal protection;

4 - your personal data are processed in compliance with the Privacy Code and the rights guaranteed by EU Reg. EU 679/2016. However, the rights referred to in Articles 15 to 22 of the Regulation may not be exercised by making a request to the data controller or by lodging a complaint pursuant to Article 77 of the Regulation, if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the employee who reports the misconduct of which he/she has become aware as a result of his/her work. The data controller is DR SCHÄR AG/S.p.A.

Data of the Complainer

| Do you wish to provide your identif | fying information? □ NO. □ YES |
|-------------------------------------|--------------------------------|
| First Name | |
| Surname | |
| Current job title/role or position | |
| Job title / role or position at the | (Fill in if different) |
| time of the complaint | |
| Current location and | |
| organisational unit | |
| Location and organisational unit at | (Fill in if different) |
| the time of the complaint | |
| Hierarchical Superior | |
| Telephone | |
| Contact Email | |

Data and information on misconduct

| Organisational Unit / Office where | |
|------------------------------------|--|
| the misconduct occurred | |
| Date and/or period in which the | |
| - | |
| misconduct occurred | |
| Person who committed the | |
| reison who committed the | |
| misconduct (first name, surname, | |
| job title, role) | |
| | |
| Any other private parties involved | |
| | |
| Any companies involved | |
| | |
| How the complainer became | |
| aware of the misconduct | |
| | |

Description of the Misconduct

| Any other persons who can relate useful information on the reported fact (witnesses) | 1) 2) 3) 4) |
|---|--|
| Existence of documents or other objective evidence of the misconduct | o Yes o No |
| Indication of feedback documents. Videos, photographs, files and/or their contents | |
| The complainer: | attaches the indicated documents; does not have access to or cannot extract or cannot attach the indicated documents. |

Reasons for the misconduct and/or indication of the rule allegedly infringed

The complainer

declares

- \circ To have read the corporate information on the internal whistle-blowing system;
- To be aware of the civil, criminal and disciplinary responsibilities and consequences of his/her complaint, both for oneself and for others;
- To have read and understood the preliminary warnings and the enclosed privacy policy;
- To send this form completely filled out and signed as a .pdf file to the e-mail address whistleblowing@drschaer.com

Date

Signature

PRIVACY POLICY

1. The personal data of the complainer are processed in compliance with the Privacy Policy and the rights guaranteed by the European Regulation Reg. EU 679/2016.

2. Information on the Data Controller.

The Data Controller is Dr. Schär S.p.A./AG, with registered office in Winkelau 9, 39014 Postal (BZ), Tel. 0473 / 293 300 Email: privacy@schaer.com.

3. Information on the Data Protection Officer.

The Data Controller has also appointed a Data Protection Officer (DPO), who is available at his/her registered office (Winkelau 9, 39014 Postal (BZ), Italy, Tel. 0473 / 293 300) or by writing to <u>dpo@drschaer.com</u>.

4. Rights of the person concerned

In relation to internal whistle-blowing, the rights set out in Articles 15 to 22 of the Regulation (access, rectification, amendment, erasure, oblivion or opposition) explained in more details in the Privacy Policy published on the company's home page at <u>https://www.schaer.com/it-it/privacy</u> cannot be exercised by making a request to the data controller or by lodging a complaint pursuant to Article 77 of the Regulation, if the exercise of those rights may result in actual and concrete prejudice to the confidentiality of the identity of the complainer who reports the misconduct of which he/she has become aware as a result of his/her work.

5. Information on data categories and types of data processed

For the purposes of internal whistle-blowing through the internal channel, the company shall:

- (Categories of data) collect general personal data of the complainer voluntarily communicated by the same whistle-blower for the purpose of access to the service;
- (Type of data processed) collect, in particular, the following personal data: first name and surname, date and place of birth, residence, telephone number and contact email of the complainer.

6. Source of collected data

The source of the personal data collected is the complainer him-/herself. The provision of personal data is strictly necessary and functional to the processing of the complaint and to the provision of the legal protection provided for by Legislative Decree 24/2023; failure to provide personal data at the time of the report or with subsequent integration will make it impossible to provide for the protection of confidentiality guaranteed by law.

7. Recipients of the collected data

The recipients of the personal data collected are specially trained external parties who have defined and regulated their relationship with the Data Controller pursuant to Art. 28 Reg EU 679/2016.

8. Data Storage

The personal data obtained with the complaint are kept together with the complaint in digital or paper form, for as long as is necessary to process the complaint and the ensuing procedure. Once the data has been minimised, the complaint is archived for a period of one year and, in any case, deleted after one year from archiving.

9. Communication or dissemination of data

The personal data obtained with the complaint are not transferred to third countries outside the EU or to international organisations, nor are they stored on servers located in a third country.

10. Automated processing

Under no circumstances does the Data Controller, neither directly nor indirectly, use automated decisionmaking processes to process the complainer's personal data collected through the internal reporting channel. Date Signature of the

Complainer