

## INFORMATION NOTICE on the introduction and implementation of the WHISTLEBLOWING CHANNEL FOR THE ENTIRE GROUP

Dr. Schär S.p.A. informs all employees of the Schär Group, who are employed at each of the company's sites, plants or offices, that the Group, in compliance with Legislative Decree 24/2023 and the EU Directive 2019/1937, has activated an internal reporting system of administrative, accounting, civil and criminal offenses (so-called whistle-blowing).

The reporting system is accessible through an IT platform which guarantees the confidentiality of the identity of the whistle-blower, the person involved and the subject of the complaint.

Dr. Schär S.p.A. assures that the protection of confidentiality for whistle-blowers is guaranteed, both during the reporting phase as well as during the subsequent processing of the complaint and also during any disciplinary proceedings that may follow.

The system is applied at all Schär offices worldwide and is extended to all employees, at any level and in any case employed at any division, department or facility of the Group.

Any complaint can be filed through the digital platform provided for this purpose.

The platform is accessible from the footer of the site <https://www.drschaer.com> , by clicking on the active link “whistle-blowing”.

The active link refers to the access platform to the IT channel, on the <https://drschaerwhistleblowing.effizient.it/#/>, page, from which it is possible to file the complaint by following the guided path.

The complaint is filed at the end of the compilation wizard that guides the user in providing all the necessary information.

When the complaint is filed, the system generates a **personal access code** which is transmitted only to the whistle-blower in order to enable him/her to get in contact with the receiving office: by reactivating the platform and entering the personal access code, the whistle-blower has direct access to the file on his/her complaint. **For reasons of confidentiality and cybersecurity, a procedure for retrieving the access code is excluded! For this reason, the whistle-blower must copy and keep the personal access code in a safe place!**

The service is already active. Complaints can be made in any of the languages spoken at Dr. Schär's locations.

The management of the whistle-blowing channel is entrusted to an external and autonomous managing and receiving office, specifically charged with ensuring the protection of whistle-blowers, while maintaining the confidentiality of their identity and thus protecting them from any possible retaliation due to the complaint.

Using a platform and entrusting the processing of complaints to an external office ensures that the processing of personal data relating to each individual complaint is carried out in compliance with the General Data Protection Regulation and the Privacy Code.

In order to make the service even more efficient, it is possible to access the whistle-blowing platform by using the “Tor Browser” application, which further protects the user’s anonymity. To use this service, simply download the “Tor Browser” and, once installed, copy the address: **P6xm3k4mt4uxb6bv2crkzqiv7tmzfu77jgfnupbhpnxm3fnlpbeezqd.onion**

All information relating to the new internal whistle-blowing system, the whistle-blowing channel, the procedures and requirements for filing complaints, as well as the protection for whistle-blowers will be displayed on the company's notice boards, distributed through information brochures as well as made easily accessible through publication on the company website.

Dr. Schär S.p.A.

DOCUMENT	Application	Processing	Validation	Valid from
WB.03_Information notice – Spicy	Dr. Schär S.p.A. Group	Odv Headquarter	CEO Dr. Schär S.p.A.	31/08/2024