

Whistleblowing Management Procedure

Approved by resolution of the Board of Directors on 1st December 2023

Effective from 1st December 2023

Index

1. AIMS	3
2. REFERENCE LAWS.....	3
3. DEFINITIONS	4
4. ADDRESSEES	6
5. FEATURES OF THE REPORTS	6
5.1 Object and content of the Report	6
5.2 The reporting channels	8
6. REPORT MANAGEMENT PROCESS	8
6.1 Reception, evaluation and investigation	8
6.2 Monitoring corrective actions and periodic reporting	10
6.3 Disciplinary Provisions	10
7. GENERAL PRINCIPLES OF CONDUCT.....	11
7.1 Measures to protect the confidentiality of the Whistleblower’s identity.....	11
7.2 Protection of the Whistleblower from retaliation.....	11
7.3 Protection of the Persons Concerned.....	13
8. DOCUMENTATION AND FILING	13
9. FINAL DISPOSITIONS.....	13
10. ANNEXES	13

1. AIMS

This procedure (hereinafter '**Procedure**') aims to regulate the process for the transmission, reception, analysis, management and processing of Reports (so-called "Whistleblowing") made, even anonymously, by Staff of BolognaFiere and/or by Third Parties (as defined below) concerning unlawful civil, criminal, administrative and/or accounting conduct, breaches of national and/or EU regulations, conduct deemed unlawful as of Law Decree no. 231/2001 and conduct non-compliant with the Organizational Model and/or the Ethical Code of the BolognaFiere Group or with any other instrument of the internal regulatory system (procedures, policies, operative instructions, etc.) in force in BolognaFiere.

The aim is to provide the Whistleblower with clear operative instructions concerning the content, recipients and transmission channels of Reports, and the forms of protection guaranteed to Whistleblowers.

2. REFERENCE LAWS

Whistleblowing is a tool of Anglo-Saxon derivation by which employees of a public or private organization report to a specific surveillance body, inside or outside the organization, the existence of possible fraud, criminal offences, unlawful acts or irregular conduct of any kind committed by other subjects belonging to the same organization. The aim is to enable organizations to deal with the problem reported as soon as possible by alerting them to risks or detrimental situations and helping to prevent and oppose any unlawful acts.

The Procedure aims to implement Law Decree no. 24 of 10th March 2023, which in its turn implemented EU Directive 2019/1937 concerning "the protection of persons who report breaches of Union law" (the so-called Whistleblowing Directive) ('**Decree**').

For all matters not expressly indicated under this Procedure, the dispositions of the aforesaid Decree shall remain applicable in their entirety.

The said regulations envisage, in short:

- a system of protection for persons reporting information, obtained in the Work-Related Context, concerning breaches of national or EU laws to the detriment of the public interest or the integrity of the institution;
- measures of protection, including the prohibition of Retaliation, covering Whistleblowers, their Facilitators, colleagues, relatives and other legal entities linked to them;
- the setting up within the institution of Reporting channels that guarantee, using cryptographic tools where necessary, protection of the privacy and identity of the Whistleblower and of the Person Concerned and/or mentioned in the Report, as well as the content of the Report and the related documentation;
- the possibility, in addition to the faculty of reporting to the judiciary or accounting authorities, of making External Reports (where one of the conditions exist as of art. 6 para 1 of the Decree) through the channel handled by the National Anti-Bribery Authority (hereinafter ANAC), or to make Public Disclosures (where one of the conditions exist as of art. 15 para 1 of the Decree) through the press or by electronic means of dissemination able to reach a large number of people;
- disciplinary provisions or administrative fines imposed by ANAC in the cases envisaged under articles 16 and 21 of the Decree.

3. DEFINITIONS

For the purposes of this Procedure, the following shall be deemed to mean:

BolognaFiere: the company called Fiere Internazionali di Bologna - BolognaFiere S.p.A.

Work-Related Context: current or past work or professional activities performed by Staff of BolognaFiere or Third Parties in the context of legal relationships set up by these same with BolognaFiere;

Decree: Law Decree no. 24 of 10th March 2023, implementing EU Directive 2019/1937 concerning “the protection of persons reporting breaches of Union law (the so-called Whistleblowing Regulations)”;

Public disclosure: making available in the public domain information on breaches through the press or by electronic means or in any case via means of dissemination able to reach a large number of people. To the effects of art. 15 para 1 of the Decree, the Whistleblower may make a public disclosure if any of the following conditions is fulfilled: i) the person first reported internally and externally, or directly externally, but no appropriate action was taken in response to the report within the timeframe set for envisaging or adopting measures in response to this same; ii) the person has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest; (iii) in the case of external reporting, there is a risk of retaliation or there is a low prospect of the breach being effectively addressed, due to the particular circumstances of the case, such as those where evidence may be concealed or destroyed or where there are grounds to believe that the recipient of the Report may be in collusion with the perpetrator of the breach or involved in the said breach;

Facilitator: a natural person operating in the same Work-Related Context who assists a Whistleblower in the Reporting process and whose assistance should be confidential;

Internal Audit Function: the company organizational structure of BolognaFiere identified as the recipient of the Reports with the duty to carry out – drawing on the collaboration where necessary of further competent company functions and/or third parties – checks on the facts reported, in order to assess whether or not they are manifestly unfounded and, where this is not the case, to propose suitable provisions to the competent bodies of the Company;

BolognaFiere Group: BolognaFiere and/or companies controlled by this same to the effects of art. 2359, para 1, no. 1 of the Italian Civil Code.

Information on breaches: information, including reasonable suspicions, about the breaches defined in Para 5.1, which occurred or, on the basis of concrete elements, are likely to occur in the Work-Related Context, or elements concerning conduct, including that by omission, intended to conceal such breaches. The definition also covers breaches occurring in the context of a legal relationship not yet begun or terminated in the meantime, if this information has been obtained in the Work-Related Context, including the trial period or the selection or pre-contractual phase;

Organizational Model: the Organization, Management and Control Model adopted by BolognaFiere to the effects of Law Decree no. 231/2001;

Supervisory Body: the Supervisory Body of BolognaFiere, appointed to the effects of art. 6, para 1, letter b) of Law Decree no. 231/2001, provided with autonomous powers of initiative and control and with the duty to

supervise the functioning of, and compliance with, the Organizational Model and to curate its updating;

Person Concerned: a natural or legal person referred to in a Report made via the internal or external channel, a statement to the police or a public disclosure as a person to whom the breach is attributed or in any case as a person implicated in the breach reported or publicly disclosed;

BolognaFiere Staff: employees of BolognaFiere of whatsoever typology of contract, pay grade or function, including permanent and temporary employees, managers, junior managers, collaborators, apprentices etc., and members of the organs of administration, management, control, supervision or representation of BolognaFiere (e.g. General Meeting, Board of Directors, Board of Auditors, Supervisory Body, etc.), even where they exercise such functions only *de facto*;

Whistleblower: a natural person who makes a report via the internal or external Reporting Channel, a statement to the police or a public disclosure, on breaches acquired in the context of his or her Work-Related Context;

Report: the oral or written communication of information on breaches as defined more fully under Para 5.1;

External Reporting: the written or oral communication of information on breaches made by the Whistleblower via the external reporting channel activated by the National Anti-Bribery Authority (ANAC). To the effects of art. 6, para 1, of the Decree, the Whistleblower may make an External Report wherever one of the following conditions is fulfilled: i) activation is not obligatorily envisaged, in his or her Work-Related Context, of an internal reporting channel or this latter, though obligatory, is not active or, if activated, is not compliant with the dispositions of art. 4 of the Decree; ii) he or she has already made an Internal Report and this latter has had no follow-up; iii) he or she has reasonable grounds to believe that, if he or she made an Internal Report, it would not receive an effective follow-up or would run the risk of retaliatory conduct; iv) he or she has reasonable grounds to believe that the breach constitutes an imminent or evident danger to the public interest;

Internal Reporting: the oral or written communication of information on breaches made by the Whistleblower via the internal channel;

Third Parties: natural or legal persons, other than BolognaFiere Staff, having, in any form, relationships of work, collaboration or business with BolognaFiere, including – not exhaustively – customers, partners, suppliers of products or services (also under contract/subcontract), freelance workers or those with collaboration agreements, freelance professionals, consultants, agents, intermediaries, volunteers and apprentices (paid or unpaid); that is to say anyone with an involvement of any kind with BolognaFiere.

Review of Reports: a quarterly review drawn up by the Internal Audit Function containing indications of Reports (i) received in the quarter of reference, (ii) received in previous quarters but not yet closed in the quarter of reference, (iii) closed in the quarter of reference. The review shall show the “status” of each Report and any actions taken by BolognaFiere (corrective actions of disciplinary provisions).

Retaliation: any conduct, act or omission, even only attempted or threatened, prompted by a Report made via an internal or external channel, by a statement to the police or by a public disclosure, and which causes or may cause, directly or indirectly, unjustified detriment to the Whistleblower.

4. ADDRESSEES

In compliance with the Decree, subjects that may make Reports are:

- shareholders and members of the organs of administration, management, control, supervision or representation of BolognaFiere (e.g. General Meeting, Board of Directors, Board of Auditors, Supervisory Bodies, etc.), even if exercising such functions only *de facto*;
- employees of BolognaFiere of whatsoever typology of contract, pay grade or function, including permanent and temporary employees, managers, junior managers, collaborators, apprentices etc.;
- freelance workers and persons with a collaboration agreement who perform their work activities at BolognaFiere;
- customers, partners, suppliers of products or services (also under contract/subcontract), freelance professionals, consultants, agents and intermediaries who perform their activities at BolognaFiere;
- volunteers and apprentices, paid and unpaid, who perform their activities at BolognaFiere.

Whistleblowers shall be protected even where the legal relationship has not begun if the information on breaches was obtained during the recruitment process or other pre-contractual phases, during the trial period or after the termination of the relationship if the information on breaches was obtained during the said relationship.

The protection accorded to Whistleblowers also extends to:

- Facilitators;
- persons from the same Work-Related Context as the Whistleblower and linked to this same by a stable sentimental relationship or their relations to the fourth degree;
- colleagues of the Whistleblower who operate in the same Work-Related Context or who have a habitual and current relationship with the Whistleblower;
- legal entities that the Whistleblower owns, works for or is otherwise connected with in a Work-Related Context.

The dispositions of this document shall also apply to anonymous Reports, provided they are accompanied by sufficient evidence, as defined in this Procedure.

5. FEATURES OF THE REPORTS

5.1 Object and content of the Report

The subjects identified under Para 4 may transmit Reports concerning conduct, acts or omissions, committed or attempted, consisting in:

- (i) unlawful administrative, accounting, civil or criminal acts occurring in the Work-Related Context;
- (ii) unlawful conduct covered by Law Decree no. 231/2001 or breaches of the Organizational Model or Ethical Code of the BolognaFiere Group or of any other internal regulatory system (procedures, policies, operational instruction, etc.) in force at BolognaFiere and subject to disciplinary sanctions;
- (iii) unlawful acts (occurring in the Work-Related Context) falling within the field of application of the EU or national laws indicated in the Annex to the Decree or in national laws implementing the EU laws indicated in EU Directive 2019/1937 and related to the following sectors: public tenders, services,

products and financial markets; prevention of money-laundering and financing of terrorism; product security and compliance; transport security; environmental protection; protection from radiation and nuclear security; safety of food and animal foodstuffs and the health and well-being of animals; public health, consumer protection; protection of private life, of personal data and the security of IT networks and systems;

- (iv) acts or omissions detrimental to the financial interests of the EU (art. 325 TFEU), specified in EU-derived law;
- (v) acts or omissions concerning the free circulation of goods, persons, services and capital in the internal market, including breaches of EU laws covering: a) competition; b) state aid; c) corporation taxes;
- (vi) acts or conduct that render vain the object and purposes of the dispositions as of iii), iv) and v);
- (vii) acts or conduct likely to provoke damage or prejudice of whatsoever kind (e.g. to assets, image, etc.) to BolognaFiere or its shareholders, Staff of BolognaFiere or to Third Parties.

Reports are not permitted that contain protests, claims or requests of a personal nature by the Whistleblower, or concerning individual work relations or relations with hierarchical superiors, colleagues or collaborators, unless these are linked to or referable to breaches of the Organizational Model, the Ethical Code of BolognaFiere or any other instrument of the internal regulatory system (procedures, policies, operational instructions, etc.) in force at BolognaFiere, and subject to disciplinary sanctions¹.

Reports must be made in good faith, must arise at least from reasonable suspicion and, in order to enable the Company to proceed with due checks and verify the validity of the facts reported, must be based on concrete elements obtained in the Work-Related Context. In particular, the Report should preferably contain the following elements:

- a precise description of the facts reported;
- if known, the time and place in which the facts reported took place;
- if known, the personal data or other elements (such as the position and the service in which the activity is performed) enabling identification of the person(s) deemed responsible for the breach(es), and any other person(s) involved and/or who might possess information on the facts reported;
- an indication of any documents available in support of the Report;
- any other useful element for reconstruction of the facts and verification of the validity of the Report.

¹ For completeness it is stated that, to the effects of the Decree, the following typologies of Report are likewise ruled out:

- (i) Reports of breaches concerning national security, or contracts related to defence or national security, unless these aspects are covered by EU-derived law;
- (ii) Reports of breaches obligatorily disciplined by EU or national laws, as indicated under art. 1, para 2, letter b), of the Decree (concerning services, products and financial markets, the prevention of money-laundering and financing of terrorism, transport security and environmental protection);
- (iii) facts or circumstances coming under the application of national or EU dispositions concerning classified information, forensic or medical secrets or the confidentiality of judicial decision-making, or coming under the application of national dispositions concerning criminal procedure, the autonomy and independence of the magistracy, dispositions concerning the functions and attributions of the Higher Council of Magistrates (CSM), national defence, public order and safety, or concerning the exercise and protection of workers' rights to consult their representatives or trade unions, the protection of these same from unlawful conduct or acts arising from such consultations, the autonomy of the social partners and their right to stipulate collective agreements, and the outlawing of anti-trade union conduct.

The transmission of anonymous Reports, in which the Whistleblower does not reveal his/her identity, is permitted.

5.2 Reporting channels

In order to receive Reports through internal channels, BolognaFiere has activated “Legality Whistleblowing – Segnalazioni Illeciti”, a platform provided by DigitalPA (**‘Platform’**) and accessible via the dedicated section of the BolognaFiere institutional site: <https://bolognafiere.it/segnalazioni-whistleblowing/>.

Reports can be made both in writing and orally through this Platform.

All information inserted in the Platform, whether by the Whistleblower or by the Internal Audit Function appointed to handle the Reports in compliance with Para 6.1 below, are coded with an advanced cryptographic system that ensures the confidentiality of the Whistleblower, the Person Concerned and any other persons mentioned in the Report, as well as the content of the Report and the related documentation.

The Platform allows the Whistleblower to transmit Reports without previously registering or revealing his/her identity. If, on the other hand, the Whistleblower accessing the Platform reveals his/her personal data, the Report will in any case be transmitted anonymously to the Internal Audit Function appointed to handle the Reports (i.e. the Whistleblower’s data are kept separate from the Report), without prejudice to the Internal Audit Function’s faculty to access the Whistleblower’s data.

Oral Reports are conserved in the database in coded form, as with the rest of the information. The Whistleblower’s voice is altered so as to be unrecognizable. A transcription may be made of the Report and the Whistleblower will be entitled to check, rectify, confirm and sign it by subscribing to the channel or by requesting a physical meeting, which the Internal Audit Function will grant within a reasonable timeframe.

Where the premises exist, the Whistleblower may make External Reports via the reporting channel made available by ANAC and accessible at: <https://whistleblowing.anticorruzione.it>.

6. REPORT MANAGEMENT PROCESS

6.1 Reception, evaluation and investigation

The Report Management Process, regardless of the means of transmission used by the Whistleblower, is entrusted to the Internal Audit Function, upon which this specific duty has been conferred.

Following the insertion of a Report on the Platform, this latter will immediately give notice (i) of receipt to the Internal Audit Function as the subject appointed to manage the Reporting process, and (ii) of its correct forwarding (and therefore its reception) to the Whistleblower.

An Internal Report delivered by a means other than the reporting channel as of Para 5.2 above and/or delivered to a subject other than the Internal Audit Function (e.g. Reports sent via e-mail, in a closed envelope, orally, etc.) will be transmitted to this latter within 7 (seven) days of its receipt. The said Function will immediately insert the Report on the Platform and will at the same time give notice to the Whistleblower.

On receiving the Report, the Internal Audit Function will:

- (i) take charge of the Report for follow-up, making a preliminary check that the necessary premises are present for an evaluation of the Report, as well as sufficient elements of proof to allow an investigation

on the merits of the facts contained in the Report;

- (ii) classify the typology of Report and the potential regulatory context.

For the purposes of the follow-up and the checks deemed useful for verification of the facts described in the Report, the Internal Audit Function may also request, in relation to the nature and classification of the breach, the collaboration of additional competent company functions and/or specifically appointed third parties.

The follow-up may involve any form of investigation deemed suitable, including personal interviews with (i) the Whistleblower and any other subjects (indicated by the Whistleblower) who may have useful knowledge of the facts reported and (ii) the Persons Concerned (obligatorily if requested by these same). The Platform will conserve in digital form the written notes of these meetings (the content of which may be verified, rectified, confirmed and signed by the Whistleblower or the Person Concerned) together with any other written observation or document acquired during these interviews.

The term for the conclusion of the procedure, with transmission to the Whistleblower of a suitable response concerning the result or state of this same, is set at 3 (three) months from the date of notice of reception or, in the absence of such notice, 3 (three) months from expiry of 7 (seven) days from submission of the Report by the Whistleblower. If the Internal Audit Function deems that verification of the facts described in the Report requires an extension of the terms for conclusion of the investigation procedure, it will suitably inform the Whistleblower.

Throughout the investigation, the Whistleblower will be entitled to follow the ongoing state of this same and to dialogue with the subjects responsible for, or involved in, the process of managing the Report, via dedicated instruments available on the Platform. These same instruments will also enable the Internal Audit Function to request further information or explanations concerning the information on the breaches transmitted by the Whistleblower.

If, as a result of suitable verifications and interviews with the Whistleblower and/or the other subjects indicated below, the Report proves:

- (i) clearly unfounded or without sufficient evidence or irrelevant, the Internal Audit Function will dismiss it, informing the Board of Directors, the Board of Auditors and the Supervisory Body. The Board of Auditors and the Supervisory Body, where the Report reveals aspects within their competence, will be entitled to confirm the evaluation or give indications for alternative procedures;
- (ii) wholly or partly founded, the Internal Audit Function will communicate the results of the investigations to the Board of Directors, the Board of Auditors and the Supervisory Body, making recommendations to the management of the areas/processes concerned and, if the necessary elements or legal premises exist, suggesting disciplinary procedures against the Staff of BolognaFiere or of Third Parties (as described more fully under Para 6.3) or, in the most serious cases, will provide the necessary material for a report to the competent Judiciary Authority. The Board of Auditors and the Supervisory Body, where the Report reveals aspects within their competence, will be entitled to confirm the evaluation or give indications for alternative procedures.

All evaluations by the Internal Audit Function (including recommendations and proposals for disciplinary procedures) concerning each Report, with any amendments resulting from the intervention of the Board of Auditors and the Supervisory Body, will in any case be formalized in writing in a dedicated report. The recommendations formulated in these reports will be transmitted to the areas/processes concerned.

6.2 Monitoring corrective actions and periodic reporting

The management of the areas/processes concerned is responsible for implementation of recommendations received from the Internal Audit Function on the basis of this Procedure and for taking any corrective actions indicated.

The Internal Audit Function shall likewise be responsible, at the end of the process:

- for filing the Reports together with all supporting information and documents, including final decisions made at the end of the investigations;
- for monitoring the corrective actions proposed and assumed by the top management of BolognaFiere concerning each specific Report;
- for periodic reporting, with a dedicated review, of Reports received and the current state of their examination.

In particular, the Internal Audit Function shall provide a quarterly Review of Reports, indicating Reports (i) received in the quarter of reference, (ii) received in the previous months but not yet closed in the quarter of reference, (iii) closed in the quarter of reference. The Review shall show the “status” of each Report and any actions taken (corrective actions and disciplinary procedures).

Each Review of Reports shall be transmitted by the Internal Audit Function to:

- the President of BolognaFiere;
- the Board of Auditors of BolognaFiere;
- the Supervisory Body of BolognaFiere.

6.3 Disciplinary Provisions

The Disciplinary System envisages:

- (i) Sanctions against the Persons Concerned regarding whom the commission of the unlawful act reported has been verified;
- (ii) Sanctions against anyone who breaches the rules for the confidentiality and protection of the Whistleblower;
- (iii) Sanctions in the case of Retaliation against the Whistleblower by Staff of BolognaFiere;
- (iv) Sanctions against the Whistleblower if he/she has made with malice or grave negligence Reports that prove unfounded (reports in bad faith).

If the investigations conducted according to this Procedure show that Staff of BolognaFiere or of Third Parties are responsible for unlawful, illegitimate or improper acts covered by one of the four cases above, BolognaFiere will act swiftly to apply the sanctions envisaged by the Disciplinary System as defined in the Organizational Model (General Part), in line with applicable National Collective Labour Contracts.

If the Report has aspects that come under its competence, the Supervisory Body – formulating where necessary suitable indications during its interaction with the Internal Audit Function as of Para 6.1 above – will undertake to convey the need for disciplinary provisions:

- directly to the Board of Directors and the Board of Auditors, in the case of sanctions applicable to Staff of BolognaFiere (including members of the organs of administration, management, control, supervision or representation of BolognaFiere);

- to the Manager of the organizational unit handling the contractual relationship, with copy to the CEO in the case of sanctions applicable to Third Parties (e.g. withdrawal from contracts with suppliers, etc.).

In the case of criminally liable conduct, which BolognaFiere is obliged to report to the police, or against which it might seek legal redress, in this case, too, the Supervisory Body – formulating where necessary suitable indications during the dialogues with the Internal Audit Function envisaged under Para 6.1 above, and whenever the Report has aspects that come under its competence – will immediately inform the Board of Directors and the Board of Auditors in order to adopt suitable legal action.

7. GENERAL PRINCIPLES OF CONDUCT

7.1 Measures to protect the confidentiality of the Whistleblower's identity

The Whistleblower will receive an Informer – which is an integral and substantial part of this Procedure – on the processing of his/her personal data to the effects of art. 13 of EU Regulation 2016/679 on privacy, which shall also indicate the means and conservation times of the Reports (see Annex).

The Whistleblower's identity shall be protected at all phases of the procedure described in the above Paragraphs, also by means of separate management by the Platform of the Report and of the Whistleblower's data. This protection (i) means that, if the Internal Audit Function needs the collaboration of any other competent company functions and/or third parties specifically appointed to carry out the investigations, the said Internal Audit Function will allow access only to the content of the Report and not also to the Whistleblower's data and (ii) applies equally to the organs of administration, management, control, supervision or representation of BolognaFiere, which will not be able to carry out investigations or make inquiries aimed at discovering the identity of the Whistleblower.

In any case, the obligation to maintain maximum confidentiality concerning the identity of the Whistleblower and the object of the Report regards all persons who, for whatsoever reason, become aware of these same or are involved in the process of verifying the facts described in the Report.

The Whistleblower's identity may be revealed only in the presence of one of the following circumstances:

- the Whistleblower has given his/her express consent;
- anonymity cannot be claimed as of law (for example, in the case of investigations by judiciary authorities).

The Whistleblower's express consent to the revealing of his/her identity is also required if disciplinary procedures are activated against the Persons Concerned as a consequence of the facts described in the Report and the counterclaim against the disciplinary sanctions proves wholly or partly founded, and a knowledge of the Report and the identity of the Whistleblower is essential for an adequate defence. If the Whistleblower does not give his/her consent, after being informed of the necessity to reveal his/her identity to allow the Persons Concerned a proper defence, the Report will not be usable for purposes of the disciplinary procedure.

Breach of the obligation to maintain the confidentiality of the Whistleblower's data, except where waived as in the cases listed above, shall lead to disciplinary action as envisaged under Para 6.3, without prejudice to any other form of liability under the law.

7.2 Protection of the Whistleblower from retaliation

BolognaFiere, in compliance with the dispositions of the Decree, will not tolerate any consequences prejudicial to the Whistleblower arising from transmission of the Report. It prohibits the adoption of any form of Retaliation against the Whistleblower and will deem such conduct a matter for disciplinary sanctions.

By way of example only, the following shall be deemed Retaliations, as of the decree:

- a) dismissal, suspension or equivalent measures;
- b) demotion or lack of promotion;
- c) change of functions, change of workplace, reduction of salary, change of working hours;
- d) suspension from training or any restriction of access to this same;
- e) negative notes of merit or negative references;
- f) adoption of disciplinary measures or other sanctions, including pecuniary ones;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or other unfavourable treatment;
- i) failure to convert a temporary labour contract to a permanent one, where the worker could legitimately expect such conversion;
- j) failure to renew a temporary labour contract or early termination of this same;
- k) damage, including that to the person's reputation, in particular on the social media, or economic or financial detriment, including loss of economic opportunities and loss of income;
- l) insertion in improper lists on the basis of a formal or informal sectoral or industrial agreement, which may make it impossible for the person to find work in the same sector of industry in the future;
- m) early termination or cancellation a contract for the supply of goods or services;
- n) cancellation of a licence or a permit;
- o) a request to submit the person to psychiatric or medical checks.

Regarding this, and without prejudice to the Whistleblower's right to appeal to the judiciary authorities where the premises exist, the Decree protects a Whistleblower who considers that he/she has been the subject of Retaliation (even if only attempted or threatened) linked to the transmission of a Report, disposing that:

- the adoption of such discriminatory or retaliatory acts may be reported to the ANAC, which will inform the National Inspectorate of Labour for the proper provisions;
- acts breaching the prohibition of Retaliations shall be null.

It is observed that, in the case of disputes linked to actions that appear to have been taken subsequently to the Report and in breach of the prohibition of Retaliations, the onus shall be on the employer to prove that such actions were based on reasons unconnected with the said Report (so-called reversal of the burden of proof).

The aforesaid protection, however, shall not extend to "*cases of liability for slander or libel or for these same as of art. 2043 of the Italian Civil Code*". The protection shall not apply, therefore where the Report contains false information provided with malice or grave negligence. The said protection shall apply only when the Whistleblower is in good faith, that is to say he/she has reported the problem in the reasonable conviction, based on elements of fact, that the unlawful conduct reported has taken place.

In the case of verified Retaliations against the Whistleblower, or of verified misuse of the Reporting instrument by this same, BolognaFiere may apply disciplinary sanctions as defined in Para 6.3.

7.3 Protection of the Persons Concerned

This Procedure shall not be prejudicial to the Whistleblower's civil and criminal liability in the hypothesis of a slanderous or libellous Report to the effects of the Italian Criminal Code and art. 2043 of the Italian Civil Code.

Any forms of misuse of this Procedure, such as manifestly opportunistic Reports and/or Reports intended only to harm the Persons Concerned or other subjects, and any other hypothesis of improper use or intentional manipulation of the instrument as of this procedure, as well as unfounded Reports made with malice or grave negligence, shall be likewise subject to disciplinary or other proper proceedings.

As protection for the Persons Concerned, no disciplinary sanctions may be applied to these same on the basis of the Whistleblower's statements during the period in which their liability is being verified, that is to say in the absence of objective confirmation and before investigations have been made as to the facts claimed in the Report.

The identity of the Persons Concerned (and any other persons mentioned in the Report) will be protected until the conclusion of the procedures set up as a result of the Report, respecting the same guarantees as those envisaged for the Whistleblower.

8. DOCUMENTATION AND FILING

The Reports and their related documentation will be conserved – via the Platform and therefore with means and instruments such as to ensure security and confidentiality – for the time necessary to process the Report and to carry out any procedures arising from this same, and in any case, in compliance with the Decree, for not more than 5 (five) years from the date on which the final result of the reporting procedure is communicated. Upon expiry of this period, the data will be definitively cancelled or rendered irreversibly anonymous.

9. FINAL DISPOSITIONS

This Procedure shall be effective from the date indicated at the beginning. Every successive updating of the Procedure shall, from the date of its issue, cancel and substitute all previously issued versions.

This Procedure, and likewise any subsequent updating of it, has been submitted for the approval of the Board of Directors of BolognaFiere S.p.A.

The Procedure is made available on the company Intranet and on the institutional site of BolognaFiere in the section <https://bolognafiere.it/segnalazioni-whistleblowing/>.

10. ANNEXES

Annex 1 *Informer on the processing of personal data as of art. 13 of EU Regulation no. 2016/679*