

Trento, 12 December 2023

Notification – Whistleblowing

We hereby inform you that **Legislative Decree no. 24 of 10.03.2023, which implements the Whistleblowing procedures** introduced by Directive (EU) no. 1937/2019 concerning the “Protection of persons who report breaches of Union law”, **has come into force on 30 March 2023**. This regulatory framework **establishes rules and procedures aimed at guaranteeing the protection of “whistleblowers”**, i.e., employees who report information on violations at the workplace, to include both illicit acts or omissions, and abusive practices. Legislative Decree no. 24 of 10.03.2023 - whose provisions have taken effect on **17 December 2023**- **requires employers to establish and guarantee the provision of an internal, confidential and protected channel at the disposal of employees for the receipt of reports.**

Furthermore, current legislation requires a **high degree of organisation and awareness to ensure the confidentiality and protection of employees who report violations and to provide guidance on how to submit reports**. Therefore, it becomes a priority to define an internal channel for receiving and managing reports.

To this end, the Unifarm Group has resolved to make use of a computerised tool called “**ReBlowing**” created by ReNorm S.r.l., to allow employees to send reports - **in Italian and German** - in a **practical, simple and secure** manner via the following link access to the portal: www.renorm.it/it/reblowing

The report you send will be managed by a third party, “ReNorm S.r.l.”, which will encrypt your name, surname and e-mail address in order to guarantee greater confidentiality. The content of the report will be shared, in a pseudonymised manner, to the internal contact person in charge.

In order to submit a report - after clicking on the “I would like to send a report” button, you must enter the following:

Access code: **UN0001RBW**

Password: **zyyEeZi5Zpawal#PYygM%(x\$**

Business name: **E-Pharma Trento S.p.A.**

VAT number/Tax ID: **01420070227**

If you still have doubts you can consult the Guide for the use of the ReBlowing Portal of ReNorm S.r.l.

For further information regarding the “ReBlowing” service, you can contact us directly at: reblowing@renorm.it

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Unifarm Group Company subject to management and coordination pursuant to Art.



PERSONAL DATA PROCESSING INFORMATION - WHISTLEBLOWING

Pursuant to Art. 13 of Regulation (EU) 2016/679 relating to the protection of natural persons with regard to the processing of personal data (the "GDPR")

Dear Whistleblower,
E-Pharma Trento S.p.A. (hereinafter, for the sake of brevity, the "Data Controller"), as Data Controller, hereby wishes to inform you that the personal data provided by you will be processed according to the principles established by Article 5 of the GDPR.

1. Purpose of processing

The personal data you enter on the ReBlowing platform are collected and processed for purposes strictly connected to:

- A) management of reports (internal channel) of illicit conduct, relating to activities and/or behaviour that deviates from the procedures implemented by the Data Controller, meaning the violation of rules of professional conduct and/or principles of ethics referred to in current - internal and external - legislation, and/or illicit or fraudulent behaviour referable to the subjects identified by the relevant legislation;
- B) Disclosure of the identity of the whistleblower and/or of any other information from which such identity can be deduced, whether directly or indirectly, to people other than those authorised to receive and follow up on the report, pursuant to Art. 12, paragraph 2, of Legislative Decree no. 24/2023.

2. Legal basis of processing and mandatory provision

For the purpose in point 1A), the legal basis is set forth in Art. 6, par. 1, letter c), of the GDPR (fulfillment of a legal obligation to which the Data Controller is subject), in particular, in reference to the legal obligation deriving from the provisions of Legislative Decree no. 24 of 10 March 2023, and further current legislation applicable to the Data Controller.

For the purposes indicated, the provision of data is optional, as reports can be made anonymously. However, we point out that anonymous reports

will be taken into consideration only if the object of the report is sufficiently detailed so as to allow the commencement of an investigation;
For the purpose in point B), the legal basis is set forth in Art. 6, par. 1, letter a), (express consent of the Data Subject to the processing of their personal data (C42, C43).

3. Type of data processed

The data provided by you in order to represent the alleged illicit conduct of which you have become aware at the workplace are processed for the purpose of conducting the necessary investigation aimed at verifying the validity of the facts reported.

In order to manage reports, the following categories of data may be processed:

- identification data, address and other contact details, Tax ID, job title;
- special categories of personal data;
- personal data relating to criminal convictions and crimes;
- any other information relating to the person reported that the whistleblower wishes to share with the Data Controller in order to substantiate his/her report.

The data provided by the whistleblower in order to represent the alleged illicit conduct of which he/she has become aware at the workplace are processed for the purpose of conducting the necessary investigations aimed at verifying the validity of the facts reported and the implementation of any consequent measures, in compliance with current legislation. Those responsible for preliminary due diligence and for the management of the report will do so in compliance with the principles of impartiality and confidentiality, by carrying out any activity deemed appropriate, including a hearing conducted in the presence of the whistleblower and of any other subjects who can report on the facts at hand.

4. Personal Data Processing Methods

Data will be processed:

- with manual and electronic systems;
- with the use of adequate organisational and technical measures to guarantee the confidentiality of data and to avoid access to them by unauthorised third

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parties;

- by ReNorm (ReNorm S.r.l. GmbH | Via Macello · Schlachthofstr. 50 - 39100 Bolzano), which manages the internal reporting portal in the capacity of Data Processor, and has been specifically appointed pursuant to Art. 28 of Regulation (EU) 2016/679;
- by personnel duly authorised to process personal data (Art. 29 of Regulation (EU) 2016/679) and to receive the report;
- by persons authorised to perform these tasks in accordance with the law.

If, following due diligence, elements of the non-manifestly unfounded nature of the reported fact are identified, the Data Controller will transmit the result of the evaluation to the competent person identified among the following individuals, depending on the concrete needs, for in-depth investigation or for the adoption of relevant measures:

- the Director/Manager as well as to the Manager of the organisational unit of the author of the violation, so that disciplinary actions can be taken, as warranted;
- the competent bodies and departments of the Data Controller, so that any further measures and/or actions deemed necessary can be taken, also with a view to protecting the Data Controller;
- the Judicial Authority, the Court of Auditors and the ANAC (Italian National Anti-Corruption Authority).
- any other subject provided for by the relevant legislation in force.

5. Personal data retention period

The personal data collected for the above purposes will be kept for 5 years, or the time necessary to ascertain the validity of the report and, if necessary, to implement any consequent disciplinary measures and/or upon completion of any disputes initiated following the report. Furthermore, for purpose B) until the consent is revoked and unless the identity has already been revealed to third parties.

6. Provision of data to third parties

Without prejudice to communication provided in compliance with legal requirements, all data collected and processed may be provided, exclusively for the purposes specified above, if appropriate, to the Judicial Authority, the Court of Auditors and the ANAC, as well as to law firms and labor consultancy and/or on transparency and anti-corruption matters.

7. Data dissemination

Your personal data will not be disclosed in any way, or transferred or communicated to third countries outside the EU.

8. Rights of the Data Subject (Articles 15 - 22 of Regulation (EU) 2016/679)

You have the right, at any time, to request access to your personal data (Art. 15), and have your data rectified (Art. 16), erased (Art. 17), or processed with restriction (Art. 18). The Data Controller communicates (Art. 19) any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed. The Data Controller informs the Data Subject about those recipients if the Data Subject requests it. For purpose B) based on consent, you have the right to the portability of your data (Art. 20) and, in this case, you will be provided your data in a structured, commonly used and machine-readable format. In cases where the legal basis is consent, you have the right to revoke the consent given without prejudice to the lawfulness of the processing based on the consent before the revocation.

If you believe that the Data Controller has processed your data in violation of the provisions of Regulation (EU) 2016/679, you, as Data Subject, have the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which where you habitually reside or work, or in the place where the alleged violation has occurred (Privacy Protection Authority <https://www.garanteprivacy.it/>), or to take action in the appropriate judicial offices.

Please note that, pursuant to Legislative Decree no. 24/2023, the Data Controller is required to guarantee the confidentiality of the whistleblower: the identity of the reporting person and any other information from which his/her identity can be deduced, directly or

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or indirectly, will not be disclosed, without the express consent of the whistleblower, to persons other than those competent to receive or follow up on the report, without prejudice to the right of defense of the person reported and where required by law.

Data Controller

E-Pharma Trento S.p.A. with headquarters in Via Provina, 2 – 38123 Trento, reachable at: 0461.92.28.18 or info@e-pharma.com or www.e-pharma.com

Data Protection Officer (DPO) - Data

Protection Officer (DPO)

Contact [information: dpo@unifarm.it](mailto:dpo@unifarm.it)

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We invite you to view our Disclosures