

WHISTLEBLOWING PRIVACY POLICY

WHO ARE WE

The Siram Group (hereinafter the "Group") in carrying out its activities pays the most attention to the security and confidentiality of its stakeholder's personal data.

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 of April 27, 2016 (hereinafter referred to as the "Privacy Regulation"), the following information is provided to the data subjects regarding the processing of personal data carried out in the context of whistleblowing reports, made through the internal reporting channel "Whispli".

The data controller of personal data (hereinafter also the "Data Controller") is the Siram Group company that is the recipient of the report.

DATA SUBJECT

For the purposes of whistleblowing reports, the data subject and to whom the protection of their confidentiality must be guaranteed, both in relation to the identity and the content of the communications, are the reporting person, the reported person, the facilitator, the persons involved and the persons mentioned in the report as provided for in Legislative Decree 24/2023.

THE PURPOSE OF THE PROCESSING

- Receive, analyze and manage, through the designated communication channels, the reports - also made anonymously - relating to presumed irregularities and/or unlawful conduct (so-called whistleblowing reports) committed by persons who, in various roles, interact with the Controller and which the reporting subject has become aware of.
- To carry out all further activities related to the management of the report and consequent to the necessity to manage them properly (e.g. conducting interviews, collecting the elements useful for the investigation of the case examined, etc.) by the competent subjects, authorized to the treatment.
- Replying to any requests from the competent authorities and entities, etc.

LEGAL BASIS OF THE PROCESSING

The data are processed in order to comply with a legal obligation arising from the provisions of Legislative Decree No. 231/2001 and Legislative Decree 24/2023 regarding the protection of individuals who report crimes, irregularities or violations of national regulatory provisions.

WHAT PERSONAL DATA CONCERNING YOU MAY BE COLLECTED

Reports can be made, through the dedicated channels, either anonymously or by making explicit one's identity.

In the case of a report made anonymously, no data relating to the person of the reporter will be processed, except in cases provided for by law and/or with the prior authorization of the reporter. It is clear that, for the purposes of the proper management of the report and the following investigation activities, the data contained in the report itself and in the relevant supporting documentation may be processed, even in relation to other identified or identifiable persons implicated in the report.

It is specified, as an example, that the following categories of personal data may be processed:

- personal data (e.g. first name, last name, social security number, address, date and place of birth);
- contact details (e.g. telephone number, mobile number, email address);
- job and professional data (e.g. hierarchical level, company area of belonging, company role, type of relationship held with Siram S.p.A. Group companies or other third parties, profession);
- image and/or voice data;
- any information that relates to the reporter, or other data subjects, that the reporter decides to share in the report to better specify it;
- the information that the whistleblower, or other data subjects, share with the Controller as part of the management of the report;
- special categories of personal data (e.g. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.);
- judicial data;
- any other reporting data that are related or not related to the above categories.

FROM WHAT SOURCE DOES PERSONAL DATA ORIGINATE

The data are voluntarily provided by the data subjects. The refusal of their communication may imply the impossibility of the correct processing of the report or the management of any objections submitted to the report.

HOW WE KEEP YOUR PERSONAL DATA SECURE

The processing will be carried out by authorized personnel (Veolia Ethics Committee and members of the Supervisory Board of the Owner, as well as the reference team involved for investigations) and specifically trained to manage the reports. The processing may be carried out with or without the use of electronic tools, according to principles of lawfulness and fairness, in order to protect at all times

the confidentiality and rights of the data subjects in compliance with the provisions of the regulations.

Reports, either anonymous or non-anonymous, can be sent through the dedicated communication channels; it is also possible for the reporter to attach files and documentation that is suitable for attesting to the merits of their report. Personal data that are manifestly not useful for the processing of a specific report are deleted once their relevance has been ruled out. Data subjects may be asked for specific authorization, as provided for in Legislative Decree 24/2023, in the following cases:

- any disclosure of the identity of the reporting person to anyone else who is not competent to receive or follow up on reports;
- use of a recorded hotline or other recorded voice messaging system for reporting, for the purpose of documentation by recording on a device suitable for storage and listening or by complete transcription;
- report made verbally in the course of a meeting with the appropriate personnel, for the purpose of documentation by recording on a device suitable for storage and listening, or by minutes.

Data subjects may be asked for specific permission accompanied by appropriate notice, containing the reasons for the disclosure of identity, in the following cases:

- in disciplinary proceedings, if the charge is based in whole or in part on the report, where the disclosure of the identity of the reporter is indispensable for the defense of the person charged with the disciplinary offense;
- in proceedings instituted as a result of internal or external reports, where such disclosure is also essential for the defense of the person involved.

Data will not be subject to decisions based exclusively on automated processing, including profiling, that produce legal effects that relate to or significantly affect data subjects.

WHO WHOM WE CAN SHARE YOUR PERSONAL DATA

Personal data of the reporter, or other interested parties, may be made available:

- to the Group companies, including Veolia Environnement SA, which may process the data as data processors on behalf of the Data Controller;
- to Public Authorities and other entities in compliance with legal obligations (e.g., Judicial Authority, Court of Auditors, ANAC), in their capacity as Data Controllers.

DATA TRANSFER TO THIRD COUNTRIES

Personal data will be processed in the European Economic Area ("EEA"). In the event that it becomes necessary on an exceptional basis to transfer personal data outside the EEA, such transfer will take place on the basis of an adequacy decision of the European Commission, if applicable, or if there are adequate safeguards required by the Privacy Regulation.

HOW LONG WE KEEP YOUR INFORMATION

Reports and related documentation are retained for as long as necessary for the processing of the report and in any case no longer than 5 years from the date of the communication of the final outcome of the reporting procedure. Personal data, if already processed as part of the current employment relationship with the Employer-Owner, will be retained under the terms specified in the general employee disclosure available on the company intranet.

YOUR DATA PROTECTION RIGHTS AND YOUR RIGHT TO MAKE COMPLAINTS WITH THE SUPERVISORY AUTHORITY

Under certain conditions you have the right to ask us for:

- access to your personal data;
- a copy of the personal data you have provided us (so-called portability),
- the correction of the data in our possession;
- the cancellation of any data, for which we no longer have any legal basis for processing;
- opposition to processing where required by applicable law;
- the withdrawal of your consent, in the event that the processing is based on consent;
- the limitation of the way in which we process your personal data, within the limits established by the legislation for the protection of personal data.

The exercise of these rights is subject to some exceptions aimed at safeguarding the public interest (for example the prevention or identification of crimes) and our interests (for example the maintenance of professional secrecy). In the event that you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to exercise it and we will reply, as a rule, within one month.

For any complaints or reports on the methods of processing your data, we will make every effort to respond to your concerns.

However, if you wish, you can forward your complaints or reports to the data protection authority, using the relevant contact details:

The Italian Data Protection Authority

Piazza Venezia, 11 - 00187 ROME

Telephone: (+39) 06.696771

email: protocollo@gpdp.it - Certified mail: protocollo@pec.gpdp.it

CONTACTS

The contact details of the parent company Siram, as well as those of the company identified, for the specific case, as the data controller can be found at www.siram.veolia.it

Should you have any questions regarding our processing of your personal data, we ask you to use the following e-mail box: dataprotection.siram@veolia.com as well as the reference e-mail of the company of the data controller.