

WHISTLEBLOWING

RDM Group is committed to operating ethically. Therefore, it requests and expects all its employees, consultants, collaborators, temporary workers, and freelancers, as well as third-party partners such as contractors, suppliers, customers, etc., and members of the governing bodies of all Group Companies, to exhibit behaviour aligned with:

- Group Code of Ethics and Group's values;
- Organizational, management, and control model pursuant to Legislative Decree June 8, 2001, no. 231;
- Anti-corruption policy;
- Group power and delegation system;
- Health and Safety Policy, Environmental Policy, and other internal policies and procedures;
- Applicable laws and regulations.

For this purpose, RDM Group ensures a whistleblowing system through a secure and confidential channel for information and reports on potential non-compliance with ethical standards, RDM Group principles, or applicable laws and regulations.

Reporting represents an effective tool for improving the Internal Control and Risk Management System as a whole and contributes to fostering a culture of ethics, legality, and transparency within the Group.

The use of the Whistleblowing channel is limited to cases where the reporter is acting in good faith and reasonably believes that there has been, is currently occurring, or is likely to occur a violation or an event contrary to internal policies and legal regulations.

RDM Group encourages reporting of irregularities in good faith but does not tolerate false or malicious claims, mere suspicions or rumours, personal complaints, or grievances. In such cases, disciplinary actions will be taken against those who misuse the procedure.

Any unsubstantiated information, information already in the public domain and data acquired on the basis of indiscretions or scarcely reliable sources are excluded from the scope of the report. In the event of unfounded reports, made in bad faith or with serious negligence, RDM Group reserves the right to act in defence of its interests or of the injured parties.

RDM Group acknowledges that there may be circumstances in which the whistleblower prefers to report anonymously through the channels indicated by the Procedure. RDM Group - through dedicated, formally appointed, and specifically trained independent personnel (in compliance with the requirements outlined in Legislative Decree 24/2023) - will consider and analyze anonymous reports after verifying:

- The seriousness of the raised issue,
- Its credibility,
- The likelihood that the fact is confirmed by reliable sources.

A follow-up process is guaranteed for all reports.

RDM Group has implemented a web-based computer platform managed by a specialized third party, which can ensure professionalism, discretion, and compliance with local regulations to

protect the confidentiality of the whistleblower's identity, the reported party, any mentioned third parties/witnesses, and the reported facts.