

Group Whistleblowing Policy

Group Whistleblowing Policy	01	28.02.204

Approved by Board of Directors Stevanato Group S.p.A.

Summary

1. Objective 3
2. Scope 3
3. Definitions 3
4. Guidelines 5
4.1 Reporting Channel 5
4.2 Content and Submission of Reports 5
5. Applicability & Responsibility 6
5.1 General Principles 6
5.2 Management of Reports 6
5.3 Protection Measures 8
5.4 Periodic Communications 9
5.5 Record Keeping of the Reports 9
5.6 Training and Policy Dissemination 10
6. Penalty for violations of the policy 10
7. Policy Approval, Review and Update 10

OBJECTIVE

Stevanato Group promotes and considers fundamental values, in carrying out its activities, the principles set out in the Group Code of Ethics.

The Group Code of Ethics requires that employees, managers and top management and those who cooperate and collaborate with the Group for any reason, in the pursuit of their objectives and more generally service providers, business partners and anyone who has business relations with one of the companies of the Group, comply with all applicable laws and regulations and carry out their duties with honesty and integrity.

In line with and in addition to the provisions of the Code of Ethics, through this Whistleblowing Policy (hereinafter the "**Policy**"), Stevanato Group intends to promote and maintain an adequate internal control system with the aim of managing and verifying the methods of carrying out business activities in order to ensure compliance with national and community laws as well as corporate regulatory instruments and disseminate, at all levels, the culture based on transparency and awareness of the existence of such controls and its conscious and voluntary exercises.

This Policy sets out the procedure for submitting a Whistleblowing Report relating to Breaches, the guidelines for handling Reports and the standards of protection for Whistleblowers, Facilitators and Related Persons. The Policy also guarantees the principles of confidentiality, protection of anonymity and prohibition of retaliation.

The Policy does not prejudice or limit, in any way, the right or obligation of reporting to the competent judicial or accounting authorities, supervisory or legal authorities in the countries where the Stevanato Group companies operate, to any other body designated for this purpose by local legislation and/or to any supervisory body established within the companies of the Stevanato Group.

SCOPE

The Policy is addressed to all the Addressees defined in paragraph 3 and applies to the companies of the Stevanato Group (that is Stevanato Group S.p.A. and its subsidiaries, hereinafter "Group") excepted the companies based in the European Union countries for which Stevanato Group issued a specific Whistleblowing policy, without prejudice to any specific local laws governing the subject in question that may be in conflict therewith.

DEFINITIONS

- **Reports**: communication, subject to this Policy, via the procedure set out in the following paragraphs, of information concerning Breaches.
- **Breaches:** concern action or omission that may harm the public interest or the integrity of a private entity, committed during business activities or in connection therewith, by any person within the Group, on its behalf or in dealings with the Group or Group's stakeholders, that have occurred, may reasonably be expected to have occurred or are very likely to occur, including any attempts to conceal such actions or omissions, and that

    a) constitute or may constitute a breach, or an incitement to a breach of

- laws and other applicable regulations, at all levels (local, regional, national, international), notwithstanding any specific limitations defined by locally applicable regulations;
- Code of Ethics, Anti-Bribery Anti-Corruption Policy of Stevanato Group;
- Stevanato Group's Policies and Procedures (including but not limited to the Policies on Human Rights, Diversity, Equity and Inclusion, Health, Safety and Environment) and internal control principles;

– **Addressees:** of this Policy are the subjects connected in the broad sense to Stevanato Group, and to the Group companies for which it applies, who can make the report pursuant to the legislation and this Policy, including, but not limited to:

- members of corporate bodies (Including members of administrative, management or supervisory bodies) and shareholders of the Group (natural persons);
- Employees (including part-time, intermittent, fixed-term, temporary workers, apprentices, ancillary workers and occasional workers, former employees and applicants are also included within the definition of employees); freelance workers, collaborator, contractors, service providers, registered professionals and consultants;
- Any third party affiliated with the above mentioned persons;
- the employees or contractors of suppliers and third parties;
- more generally, any of the Group's stakeholders.

– **Whistleblower or Reporter:** any Addressee who submits a Report

– **Anonymous disclosure**: any disclosure from which it is not possible to deduce the identity of the Whistleblower.

– **Reported Person**: is the author or alleged author of the Breach individual or legal entity mentioned in the internal or external disclosure or in the public disclosure.

– **Facilitators** are the natural persons who assist a Whistleblower in the reporting procedure, connected to the latter through a working relationship.

– **Related Persons** are natural persons who have a personal or professional relationship with the Whistleblower.

– **Retaliation**: any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report, and which causes or may cause undue harm, directly or indirectly, to the whistleblower or to the person who made the complaint to the judicial authorities.

4. GUIDELINES

4.1 Reporting Channel

Addressees who become aware of Breaches are encouraged to report facts, events and related circumstances promptly and in good faith, provided that they have reasonable grounds to believe that such information are true.

Reports may also be made anonymously but must always be documented and detailed, so as to provide useful and appropriate elements to allow appropriate investigative activity to verify the validity of the facts reported.

A Whistleblower may submit a Report through the dedicate Reporting Channel:

In written form, or with a voice messaging system through the protected IT platform *Integrityline* (hereinafter the "Platform" or "*Integrityline*") available online on the website www.stevanatogroup.com/en/about/whistleblowing provided by the company EQS Group, for the creation of the Report and the conservation of the same and the related attached documentation, as well as for the conservation and tracking of the management activities carried out. The Reporter can also attach supporting documentation to the Report which remains archived in the relevant Report file. The Platform attributes to each report a unique identification code which allows the Reporter to verify the processing status of the Report.

The *Integrityline* compiles with the legislation regarding the protection of personal data and all data exchanged through this tool will only be available in encrypted form. The encryption and security architecture guarantee the confidentiality and anonymity of the reports and that no third party has access to the data.

4.2. Content and Submission of Reports

The Reports must concern illegitimate behaviour sand should be as detailed as possible, to provide useful and adequate information that allows for the effective verification of the truthfulness of the reported events.

If possible and when known to the Whistleblower, the Report must include:

- the name of the Whistleblower and relevant contact details for further communication; however, Reports may also be submitted anonymously, and Stevanato provides anonymous Whistleblowers with adequate means to monitor their Reports while at the same time respecting their anonymity;
- a detailed description of the events that occurred (including date and location) and how the Whistleblower became aware of them;
- which law, internal regulation, etc. is alleged to have been breached;
- the name and role of the Reported Person(s) or information identifying them;
- the name and role of any other parties who may refer on the reported events;
- any documents or other elements that may substantiate the reported events.

5. APPLICABILITY & RESPONSIBILITIES

5.1 General Principles

The following general principles will be respected in managing the Whistleblowing process and it is required that Whistleblowers and other persons involved respect these principles to the extent of their competence:

- Principle of good faith: the Whistleblower act in good faith, (i.e. the Whistleblower had reasonable grounds to believe that the information relating to the Breaches was true at the time of the Report) in such case the protections afforded to Whistleblowers are applicable even in cases where the Report proves to be unfounded;
- Principle of confidentiality: the confidentiality of Whistleblowers, of Reports and the information contained therein are granted;
- Principle of proportionality: the investigations are adequate, necessary and proportionate to achieving their purpose;
- Principle of impartiality: the analysis and processing of Reports will be carried out impartially, irrespective of the opinions and interests of the persons responsible for handling them;

5.2. Management of Reports

5.2.1 The subject responsible for receiving and examining reports is the Whistleblowing Committee (hereinafter also "WB Committee), appointed by Stevanato Group S.p.A Board of Director, for a period of 3 years, and composed of a number of 3 to 5 members belonging to the following company function:

- Legal and Compliance
- Human Resources
- Internal Audit

The WB Committee will adopt its own internal regulations for the management of reports.

In the event of conflict of interest, the report will be managed as follow:

- if a member of WB Committee is Reported Person, such member is excluded, and the case will be handled by other members of WB Committee;
- if all members of WB Committee are Reported Person the report shall be manage by Audit Committee

The WB Committee operates by ensuring the maintenance of the necessary conditions of independence and the due objectivity, competence, professional diligence and confidentiality towards all the subjects involved in the Report.

5.2.2 Reception Analysis of Reports

When a Report is sent, WB Committee sends a communication to the Whistleblower confirming that the Report has been received and acted upon, unless it is not possible to contact the

Whistleblower or if sending the communication would compromise the confidentiality of the information.

The management of the investigative activities resulting from the Reports is carried out by the Whistleblowing Committee. The operational management of the investigation activities will be established, from time to time, also considering the nature and complexity of the Report following formal communication via the Platform.

The WB Committee reviews all reports from Group companies to which this Policy applies.

The WB Committee will provide:

1. to preliminarily evaluate the Report (verification of the presence of sufficiently detailed data and information useful for an initial evaluation that excludes the evident unfoundedness of the Report) and, if the Report is not adequately detailed, may request the Reporter further information by means of a specific message inserted on the Platform which the Reporter will be able to see using the unique identification code attributed by the Platform itself to the Report;
2. to archive the Report if the analysis referred to in the previous point reveals the absence of sufficient elements, the unfoundedness of the report, or the same appears to have been made in bad faith. The archiving will be accompanied by the relevant reasons;
3. to provide in-depth and investigative activities, if sufficient elements emerge or can be deduced from the analysis referred to in the previous point 1 to not consider the Report unfounded.

In carrying out these analyses/activities, the WB Committee may:

- inform, depending on the subject matter of the Report, one or more managers of functions within the Group:
  - the Audit Committee (or an equivalent body);
  - any other person appointed for this purpose by the competent corporate bodies;
- Involve external consultants;
- conclude the investigation if during the in-depth investigation the Report is ascertained to be unfounded and proceed with archiving the Report;
- conclude the verification phase within three months from the date of receipt of the Report, unless there are justified reasons, and if the investigation has not been completed by the above-mentioned deadline, the Whistleblower is nevertheless updated as to the status of the investigation, where technically possible.
- identify any initiatives to be implemented to protect the Group (e.g. suspension, cancellation of the supplier, judicial actions, disciplinary measures against Group employees, etc.), to be communicated to the BoD which will take decisions in this regard;
- communicate to the BoD the assessment regarding the need to initiate disciplinary proceedings against the Reporter in the event of Reports made in bad faith or with defamatory intent.
- Informe the Whistleblower of the outcome of the investigation and of any actions planned to remedy the problem detected in the Report, insofar as this is technically possible and in accordance with locally applicable regulations.

All the activities as described above and any documentation acquired relating to the Reports are recorded and stored on the Platform, where all the information relating to the Report, the investigation conducted, and the reports produced are reported in summary form.

5.3 Protection Measures

5.3.1 Prohibition of retaliation

Stevanato Group will not tolerate against Whistleblowers, Facilitators, Related Persons, Reported Persons, or anyone who has cooperated in the investigation to establish the validity of the Report (including their respective Related Persons), any form of threat, retaliation or discrimination, either attempted or actual.

Any act of retaliation is void. The burden of proving that such conduct is motivated by reasons unrelated to the Report is borne by the Group.

In the case of Reports made in accordance with this Policy and unless the action constitutes a criminal offence under locally applicable regulations, and provided that the Whistleblower has justified reasons for considering that the Report is necessary in order to disclose the violation of the law, the Whistleblower shall not incur any liability, including civil or administrative liability, for acquiring or accessing information on Breaches, and shall not be held liable for defamation, breach of copyright or legal or contractual obligations of professional secrecy or data protection rules, or for the disclosure of trade secrets.

The Group reserves the right to take appropriate action against anyone who carries out, or threatens to carry out, acts of retaliation against the Whistleblowers or other recipients of this Policy.

5.3.2 Confidentiality

Stevanato guarantees the confidentiality of each Report and of the information contained therein, including the identity of the Whistleblower, the Reported Person(s), the Facilitators and any other person involved.

Their identities will not be disclosed to anyone other than the Report Manager, except whenever they give their explicit consent, or have intentionally disclosed their identity within the context of public disclosure, or disclosure is a necessary and proportionate obligation in the context of investigations conducted by the authorities or within the framework of judicial proceedings, in accordance with locally applicable regulations.

Information contained in Reports that constitute trade secrets may not be used or disclosed for purposes other than those necessary to resolve the Report.

5.3.3 Processing of personal data

The personal data (including any data belonging to special categories, such as racial and ethnic origin, religious and philosophical beliefs, political opinions, membership of political parties or trade unions, as well as personal data disclosing health and sexual orientation, data on any criminal offenses or

convictions) of Whistleblowers and of any other persons involved, acquired in connection with the handling of Whistleblowing Reports, also through the *IntegrityLine*, are processed in compliance with applicable regulation. In particular, the Group guarantees that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, with particular reference to confidentiality and data security.

Personal data will be processed by the WB Committee solely for the purpose of implementing the procedures laid down in this Policy. Appropriate privacy policy is available on the Platform.

The personal data contained in the Reports may be communicated by the WB Committee to the corporate bodies and internal departments that may be competent in each instance, as well as to the Judicial Authority and/or to any other competent authority, or to duly authorised third parties, for the purpose of activating procedures necessary to guarantee, as a consequence of the Report, appropriate legal and/or disciplinary protection against the Reported Person, if from the elements collected and verifications carried out it emerges that the circumstances initially reported are substantiated.

The processing of personal data will be limited to what is strictly necessary and proportionate to ensure proper handling of the Report and for a term not exceeding what provided for by the applicable legislation.

5.4 Periodic communications

The WB Committee will prepare a quarterly report summarizing the Reports received which they will send to:

- Audit Committee;
- Board of Directors

In addition to the above, whenever the need arises, the Whistleblowing Committee will be able to report the cases it deems appropriate to the above-mentioned subjects.

5.5 Record keeping of the Reports

The record relating to the Reports is confidential and is archived securely and in compliance with the regulations in force within the Group on the classification and processing of information and in compliance with local legislation and regulations.

The records are archived on the Platform and is accessible only to WB Committee members according to the methods for managing reports previously described.

The documents will be kept for a period of 5 years starting from the date of communication of the final outcome of the reporting procedure, or as long as it is necessary by law in the case of judicial proceedings.

If the registered voice messaging system is used for the report as well as for reports carried out through a personal meeting, the report, subject to the consent of the reporting person, is documented by those responsible for managing the reports by recording on a device suitable for storage and listening or by full transcription on a specific documentary report.

The reporting party must confirm the content of the transcript by signing.

5.6 Training and Policy Dissemination

Stevanato Group will provide all employees Whistleblowing training, which illustrates the procedures to be followed and the potential consequences in the event of misconduct.

The Policy is available on Stevanato Group web site www.stevanatogroup.com/corporate-governace , and on *SG Now* intranet, to the link *IntegrityLine.*

6. Penalties for violations of the Policy

Violations of this Policy by personnel of any company of Stevanato Group may result in disciplinary action up to and including termination of employment, as well as the potential for prosecution, fines, or imprisonment in accordance with applicable laws. Any Third-Party Representatives who violate this Policy may face termination of contracts and business relations with the Group.

7. Policy Approval, Review and Update

This Policy is approved by the Board of Directors of the Stevanato Group S.p.A. and applies to any companies of Stevanato Group excepted for companies based in EU for which Stevanato Group issued a specific Whistleblowing policy.

Stevanato Group will consider making any revisions and/or updates to this Policy, considering any changes in applicable laws and regulations, the effectiveness of the Policy in practice, and any changes in the corporate structure of the Group.

CHANGE LOG			
ED. (see version above)	**Date**	**Author**	**Modification Description**