Whistleblowing Policy

European Union

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Whistleblowing Policy European Union	01	28.02.2024

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

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1. OBJECTIVE

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

The Group Code of Ethics requires that employees, managers, 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, a culture based on transparency and awareness of the existence of such controls and their 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, in accordance with applicable local, regional, national, and international regulations, with focus on Directive EU 2019/1937.

The Policy does not 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.

2. SCOPE

The Policy is addressed to all the Recipients defined in paragraph 3 and applies to all the companies of the Stevanato Group (that is Stevanato Group S.p.A. and its subsidiaries, hereinafter "Group") based in the European Union countries, without prejudice to any specific local laws governing the subject.

3. 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 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), including but not limited to Community acts relating to specific sectors (Public tenders, services, financial institutions, statutory auditing and other insurance services, financial products and markets, prevention of money laundering and financing of terrorist activities, product safety and compliance),

as well as all European acts, or national acts implementing European acts, set out in the Annex to Directive (EU) 2019/1937, the financial interests of the European Union and/or the European internal market (subject to 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;
- Organizational and Management Model pursuant to Legislative Decree 213/2001 for Italian companies.

– **Recipients:** 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, independent contractors, contractors, service providers, registered professionals and consultants;
- any third party affiliated with the above-mentioned persons;
- the employees or independent contractors of suppliers and third parties;
- more generally, any of the Group's stakeholders.

– **Whistleblower or Reporter:** any Recipient 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, natural or legal person, 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.

– **Work-related context**: past or present working or professional activities carried out within the legal relationships with the Stevanato Group, through which, and regardless of the nature of the activities, the Reporter acquires information about wrongdoing and in connection with which they may run the risk of retaliation if a disclosure is made.

– **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.

– **External reporting:** the oral or written communication of information on breaches to the competent authorities.

– **Public disclosure:** to make information on violations public through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people.

4. GUIDELINES

4.1 Reporting Channel

Recipients 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 is true.
Reports may also be made anonymously but must always be documented and detailed, to provide useful and appropriate elements to allow for appropriate investigative activity to verify the validity of the facts reported.
A Whistleblower may submit a Report through the following channels:

I. Internal specific Reporting Channel, where required by local legislation, for each company of Stevanato Group.

a) 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 S.r.l., for the creation of the Report and the storing of the same and the related attached documentation, as well as for the storing 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* complies with the legislation set out in Regulation 2016/679 regarding the protection of personal data ("GDPR") 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.

b) Upon express request addressed to the Whistleblowing Committee, also sent through the above-mentioned channels, by means of an in-person (physical or virtual) meeting to be held within a reasonable period of time (possibly defined by locally applicable regulations).
Depending on the channel used for the report, messaging system or in-person meeting, the Whistleblower will be informed about the right of the Group to document the oral reporting in the form of accurate minutes of the conversation drawn up by the staff member responsible for handling the report.

II. External Reporting Channels And Public Disclosure

The Whistleblower is encouraged to file any Reports internally, however the Whistleblower may have the right to file Reports with the relevant local, regional, national institutions, according to

locally applicable regulations[1]. A non-exhaustive list of external competent bodies is available in the Annex___. In addition, the Whistleblower may submit a Report by public disclosure to the extent permitted by locally applicable regulations. External reporting or public disclosure does not limit the protection of the Whistleblower subject to locally applicable regulations.

III. Report to Judicial Authority

This Policy and in particular the protection measures provided for therein also applies if a violation is reported by means of a complaint to the judicial or accounting authority.

4.2. Content and Submission of Reports

The Reports must concern unlawful behaviours and must be as detailed as possible, in order to provide useful and adequate information that allows for the effective verification of the truthfulness of the reported events.

If possible, the Report must include:

- the name of the Whistleblower and relevant contact details; 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 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 & RESPONSIBILITY

[1] For Italian companies, the Reporter can make an external report to the National Anti-Corruption Authority (ANAC), if one of the following conditions occurs:
• the internal communication channel referred to in the previous paragraph is not active or, even if activated, does not comply with the provisions of national regulations;
• the Reporter has already made a report through the internal channel and it has not been followed up;
• the Reporter has reasonable grounds to believe that, if he/she made a report through the internal channel, it would not be followed up effectively or that the report itself could lead to the risk of retaliation;
• the Reporter has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.
The Whistleblower may make a report through Public Disclosure (i.e. making information on violations public domain) through the press or other means of dissemination capable of reaching a large number of people (such as media and social media), if one of the following conditions applies:
• he/she has previously made an internal and external report or has directly made an external report, and no response has been given;
• he/she has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
• he/she has reasonable grounds to believe that the external report may involve the risk of retaliation or may not have an effective follow-up due to the specific circumstances of the specific case.

5.1 General Principles

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

- Principle of good faith: the Whistleblower acts 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 subjects responsible for receiving and examining reports are:

- Whistleblowing Committee (hereinafter also "WB Committee"): appointed by Stevanato Group S.p.A Board of Directors, 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 acts as internal Report Manager for Stevanato Group S.p.A. and as external third party for other Stevanato Group subsidiaries (falling within the scope of this Policy) according to the local legislation. The WB Committee will adopt its own internal regulations for the management of Reports.

- Local Manager: appointed by the Board of Directors of the relevant Stevanato Group subsidiaries, (falling within the scope of this Policy) according to local legislation and belonging to a not operational function. The Local Manager will carry out the requested activities in close collaboration with the WB committee.

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

- If the Local Manager is the Reported Person, such report will be managed by the WB Committee excluding the Local Manager;
- If a member of the WB Committee is the Reported Person, such member is excluded, and the case will be handled by other members of the WB Committee;
- If all members of the WB Committee are Reported Persons the report shall be managed by the Audit Committee

The WB Committee and the Local Manager operate by ensuring that the necessary conditions of independence and the due objectivity, competence, professional diligence and confidentiality towards all the subjects involved in the Report are kept.

5.2.2 Reception and Analysis of the Reports

The Local Manager (for the companies where it is appointed) or the WB Committee (where no Local Manager is appointed or in case of inactivity of such Local Manager), within 7 (seven) days from the receipt of the Report, 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 WB Committee and Local Manager (where appointed) in collaboration with each other. The operational management of the investigation activities will be established, from time to time, also considering the nature and complexity of the Report.

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

The WB Committee and Local Manager (where appointed) 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 dismiss 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 dismissal 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/Local Manager may:

- inform, depending on the subject matter of the Report, one or more managers of functions within the Group:
  - the Audit Committee;
  - any other person appointed for this purpose by the competent corporate bodies;
  - The President of the Supervisory Body, in the event that the company is subject to Legislative Decree 231 of 2001 and the report concerns the commission of predicate crimes or violations of the adopted organizational model;
- involve external consultants;
- conclude the investigation if during the in-depth investigation the Report is found to be unfounded and proceed with dismissing 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 is 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, including in particular in the form of:

a)suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment; (j) failure to renew, or early termination of, a temporary employment contract; (k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry; (m) early termination or cancellation of a contract for goods or services; (n) cancellation of a licence or permit; (o) psychiatric or medical referrals.

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, the Facilitators and any other person involved.

Their identities will not be disclosed to anyone other than the subject responsible for management, 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. In this case, the Whistleblower must be informed in advance of the reasons for the disclosure, unless the provision of such information would prejudice any legal proceedings. Following this disclosure, the Whistleblower has the right to submit objections in writing. If these objections are deemed inadequate, disclosure of the information is permitted.

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 Reports, also through the *IntegrityLine*, are processed in compliance with Regulation 2016/679/EU (General Data Protection Regulation - GDPR). The Group guarantees that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as with the dignity of the data subjects, with reference to confidentiality and data security.

Personal data shall be processed by the WB Committee and Local Manager, 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;
- Supervisory Body for Italian companies for reporting concerning crimes as per Legislative Decree 231/2001.

In addition to the above, whenever the need arises, the WB 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 stored 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 stored on the Platform and are accessible only to WB Committee members and Local Manager in relation to reports relating to the Group Companies they deal with based on their involvement 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 required 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 Whistleblower 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-governance, and on *SG Now* intranet, at 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 in the risk for prosecution, fines or imprisonment in accordance with applicable laws. Any Third-Party Representatives who violates 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 based in EU.

Stevanato Group will consider making any revisions and/or updates to this Policy, also 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.

Annex 1

EXTERNAL REPORTING CHANNELS

Country	Entity	Website link
Italy	Autorità Nazionale Anticorruzione ("ANAC")	www.anticorruzione.it/whistleblowing
Germany	Bundesamt für Justiz ("BfJ")	www.bundesjustizamt.de
Slovakia	Whistleblower Protection Office	https://www.oznamovatelia.sk
Denmark	Datatilsynet Whistleblowerordningen	https://whistleblower.dk

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