



PR/D51/COU/04

*Compliance*

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Rev. 0

## U.S. WHISTLEBLOWING PROCEDURE

0	24th September 2025	New emission	Brian Cicco <i>Senior HR Director</i>	Elena Betti <i>Risk Management &amp; Compliance Director</i>
Rev	Date	Description	Written	Approved

## 1. Purpose

Sofidel America Corporation (“**Sofidel America**” or the “**Company**”) is committed to promoting high standards of honest and ethical business conduct and compliance with applicable laws, rules, regulations, industry codes, and Company policies and procedures. As part of this commitment, Sofidel America has adopted this standard operating procedure (“**SOP**”) to implement the Whistleblowing Policy enacted by SO.FI.DEL S.p.A. and its subsidiaries (collectively, “**Sofidel**” or the “**Group**”). This procedure provides a framework for reporting concerns free of harassment, discrimination, or retaliation in the United States.

## 2. Covered Reports

This procedure is intended to encourage and enable Sofidel America employees and others to raise serious concerns within the Company. The procedure applies to all “reporting persons,” a term defined in the Whistleblowing Policy to include all persons who have had, have, or may have an interest-based connection with one of the Group companies, whether paid or unpaid, including, but not limited to, employees, self-employed persons, collaborators, suppliers, clients, trainees and volunteers, shareholders, and job applicants. Directors, officers, contractors, agents, and business partners of Sofidel America may also be considered reporting persons, and are encouraged to use this procedure to report concerns.

This procedure relates to concerns or complaints regarding:

- known or suspected violations of laws, regulations, or industry codes;
- known or suspected violations of the Group’s Code of Ethics, policies, and procedures; or
- retaliation, including against individuals who make or facilitate good faith reports regarding any of the foregoing items, cooperate in investigations, or any third parties connected with such individuals who could suffer retaliation as a result of their connection.

Any of the above concerns or complaints are considered “**Reports**” under this Policy.

## 3. Procedure for Making Reports

Sofidel America employees are required to report known or suspected violations of laws, regulations, industry codes, or the Group’s Code of Ethics, policies, and procedures (collectively, “**Violations**”) through the Company’s reporting hotline, to their supervisor, or to a member of the Human Resources Department. Reports may be made anonymously. If an employee is aware of a potential Violation and does not report it, that employee may be subject to disciplinary action, up to and including termination of employment.

### 3.1 Reporting through the Hotline

Sofidel America employees and others are encouraged to report potential Violations through the Company’s reporting hotline. Reports may be made anonymously.

The reporting hotline can be accessed online at [www.sofidel.com](http://www.sofidel.com) in the GOVERNANCE section.

### **3.2 Reporting through Other Company Channels**

Sofidel America employees may also report potential Violations directly to a member of the Human Resources Department or to the employee's supervisor.

Supervisors are required to escalate Reports they receive regarding potential violations of laws, regulations, industry codes, or the Group's Code of Ethics, policies, and procedures to the Human Resources Department. The HR Manager, or Regional HR Director or Senior HR Director for Sofidel America will enter all such Reports into the Company's reporting hotline within seven days for appropriate tracking and follow-up.

If a reporting person is not comfortable reporting to the Sofidel America Human Resources Department, or if doing so would present a conflict of interest, the reporting person may report directly to the Sofidel Whistleblowing Commission.

### **3.3 Reporting to Competent Authorities**

While employees are encouraged to report concerns through Company channels, nothing in this procedure prohibits Sofidel America employees or others from reporting potential violations or law or regulations to any governmental authority.

### **3.4 Content of Report**

Reporting persons are encouraged to provide as much detail as possible regarding the subject matter of the Report, as the Company's ability to investigate or otherwise address the matter will be impacted by the quality and specificity of the information. Useful details may include:

- date, time and if relevant, location;
- names of person(s) involved, and their role(s) and business group(s);
- the reporting person's relationship with the person(s) involved;
- the general nature of the concern;
- how the reporting person became aware of the issue;
- other individuals who are aware of the issue; and
- any other relevant information to support the Report.

## **4. Review of Reports**

The Senior HR Director or his or her designee is responsible for managing the reporting hotline and performing a preliminary assessment of Reports to ensure they are appropriately handled. Reports will be evaluated and addressed as follows:

- Within seven days of receipt of the Report, the Senior HR Director or his or her designee will acknowledge receipt to the reporting person.

- The Senior HR Director or his or her designee will assess the nature of the Report, including whether it contains sufficient detail to effectively investigate, and liaise with the reporting person as necessary to gather additional facts.
- Following the initial evaluation, the Senior HR Director or his or her designee will refer the Report to the appropriate function for investigation (e.g., Human Resources, Safety, Legal).
- Reports concerning potential legal, ethical, or compliance violations, or other Reports of a serious nature, will be escalated to Legal to conduct a privileged investigation.
- The purpose of the investigation will be to determine whether a violation occurred, which Company policies (if any) were violated, the root cause of the violation, and how the violation should be remediated (whether through employee discipline, control enhancements, or both).
- If a Report lacks sufficient detail to enable diligent follow-up, and if the reporting person does not respond to requests for information within a reasonable timeframe (i.e., thirty working days from the request), the Company may decline to investigate.
- The Senior HR Director or his or her designee will document, in writing, the steps taken to investigate a Report and the conclusion reached, including any decision not to investigate a Report.
- The Senior HR Director or his or her designee may, in his or her discretion, provide feedback to the reporting person regarding the investigation and outcome.

The Senior HR Director will provide biannual reports on allegations received through Sofidel America reporting channels and associated investigations to the Sofidel Whistleblowing Commission and Board of Directors of Sofidel America.

## **5. Statement of Non-Retaliation**

Under no circumstances will Sofidel America retaliate against any person who makes a good faith report of an actual, potential, or perceived Violation. Sofidel prohibits any form of intimidation or retaliation against any person because of any lawful action to:

- provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the person reasonably believes constitutes a Violation; or
- file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed relating to a Violation.

Prohibited forms of retaliation or attempted retaliation include, but are not limited to, discharge, demotion, suspension, threats, harassment, or any other manner of discrimination with respect to a reporting person's terms or conditions of employment. This prohibition on retaliation applies to all

reporting persons, individuals who help such persons make reports (“facilitators”), and third parties who could suffer retaliation as a result of their connection with the reporting person or facilitator.

## 6. Confidentiality

Sofidel America will keep the identity of the reporting person, discussions and actions relating to the Report, and, where required by law, any third party mentioned in the report, confidential to the greatest extent possible, consistent with the necessity to conduct a sufficient investigation and/or provide disclosure in any judicial or other legal process, and in compliance with all applicable laws and regulations.

## 7. Records Retention

Any Reports will be retained by the Company for a time frame which is equal to (the “Retention Period”): (i) any legal requirements, or (ii) 7 years, whichever is greater, provided, however, that the Retention Period may be extended by the Company pending any claims, litigations or investigations.

## 8. Archiving rules

<b>DOCUMENT</b>	<b>RESPONSIBLE</b>	<b>FORMAT</b>	<b>ARCHIVING DURATION</b>
Final report and all the documents related to the whistleblowing report	Whistleblowing officer	Electronic	Depends by legal requirements