



Whistleblowing Procedure

CERVED GROUP



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1. Purpose

The Cerved Group (“Group”) conducts its business with loyalty, fairness, transparency, honesty, integrity and in accordance with the national and international laws, regulations and rules and general, standards and guidelines applicable to its activities.

The Group promotes the adoption of tools aimed at preventing, identifying and communicating behaviors that are illegal and/or carried out in violation of the ethical principles endorsed by the Group. **Consequently, the Group encourages all legal representatives, directors, executives and employees of Group companies and invites all other third parties who interact with the Group to report any violations that are relevant for the purposes of this Procedure of which they may become aware.**

To allow the filing of violation report, the Cerved Group adopted the **Whistleblowing System** subject of this Procedure, which has the following characteristics:

- it is a multichannel system that includes an advanced web platform, completely separate from and independent of the Group’s IT systems, and can be used to file violation reports from any device in a highly confidential and facilitated mode that guarantees the protection of the personal data of the whistleblowers;
- it is a single system for the entire Group, centrally managed (but within the whistleblowing management system the requisite information flows towards the management bodies of the Group companies affected by the violation report, based on the subject matter in question or the affected parties, are always guaranteed);
- it guarantees high standards of confidentiality for the information and the identities of the person subject of the violation report and the whistleblower.

The purpose of this Procedure is to explain the principles adopted to protect whistleblowers, the modalities for filing violation reports, the corresponding management process and any possible action resulting from verified violation reports.

The training for this Procedure is part of the training process for its intended recipients and is provided on a regular basis, as needed.

2. Scope of Implementation

Respect for the relevant laws and the rules of the Cerved Group, this Procedure in particular, is mandatory for all Cerved Persons. This Procedure is applicable to Cerved Group S.p.A. and the companies it controls, within the framework of the oversight and coordination activity it exercises over them, and to the violation reports received by Cerved and its subsidiaries, both in Italy and abroad.

This procedure was reviewed and approved by the Board of Directors of Cerved Group S.p.A. on **October 29, 2019** and its adoption is mandatory for all Group companies.

Each Cerved Group company shall adopt this procedure and designate its Whistleblowing System Manager by a resolution of its Board of Directors (or the corresponding corporate body/function/role, when the subsidiary's governance system does not call for such a corporate body) promptly during the first available meeting and, in any case, not later than 120 days from the approval of this Procedure by the Board of Directors of Cerved Group S.p.A.

Companies that may be established and/or may have joined the Cerved Group after the approval of this Procedure shall adopt the Procedure and designate their Whistleblowing System Manager by a resolution of their Board of Directors (or the corresponding corporate body/function/role, when the subsidiary's governance system does not call for such a corporate body) promptly during the first available meeting and, in any case, not later than 90 days from the date when it was established or joined the Cerved Group, as the case may be.

3. Definitions

- **ACCESS CODE:** A univocal access code for all Cerved Persons, supplied to access the Whistleblowing web portal.
- **ACCESS CODE FOR THIRD PARTIES:** A univocal access code for all parties other than Cerved Persons, supplied to access the Whistleblowing web portal.
- **CERVED** or the **CERVED GROUP** or the **GROUP:** Cerved Group S.p.A. and the companies over which it exercises oversight and coordination activity.
- **CERVED PERSONS:** The members of the corporate governance bodies, all employees and, more generally, all parties who perform their work activity for Cerved's benefit and any other party, person or legal entity, with whom Cerved interacts in the course of its business activity.
- **CODE OF ETHICS:** The document that sets forth the reference values and principles that guide activities and transactions with the parties with whom the Group interacts in the pursuit of its corporate purpose.
- **WHISTLEBLOWING WEB PORTAL:** The web channel used to receive violation reports and the corresponding digital whistleblowing platform accessible by Cerved Persons and third parties who interact with the Group through its website company.cerved.com.
- **COMPETENT FUNCTION/CORPORATE BODY:** The function and/or corporate body responsible for defining possible corrective actions to remedy the consequences of a violation and, as applicable, recommending disciplinary measures. Exclusively with reference to Legislative Decree No. 231/2001, the relevant function is always the Oversight Board appointed by the Group company to whom the violation report is applicable.
- **MATERIAL VIOLATION REPORT (S):** A violation report that has at least one of the following characteristics:
 - a) it concerns acts or facts that involve directors or members of the control body of a Cerved Group company;
 - b) it concerns acts or facts that involve the Chief Executive Officer and the senior management of a Cerved Group company;
 - c) it concerns criminally relevant acts or facts;
 - d) it concerns acts or facts that involve Cerved Persons from multiple company entities or multiple Group companies;
 - e) it could entail a high risk of regulatory or legal penalties, substantial financial losses or material impacts on the Group's assets and financial position, reputational damages and/or the malfunctioning of critical IT procedures;

- f) it concerns acts or facts that could have a material economic impact in terms of reputation and penalties;
 - g) it concerns violations that are repeated systematically; and/or
 - h) it has a material impact on the Group's internal control system;
- **WHISTLEBLOWING SYSTEM MANAGER:** Role performed by the Manager of the Internal Auditing Function, for all Group companies with the exception of Cerved Rating Agency S.p.A. and Cerved Master Services S.p.A., where it is performed by the Manager of the Compliance Function. The Whistleblowing System Manager is responsible for ensuring that the whistleblowing management process is handled in accordance with existing regulations. If the Whistleblowing System Manager finds himself/herself in one of the situations described in Section 6.1 *infra*, the management of violation reports is transferred to the Alternative Manager specified in the abovementioned section.
 - **231 MODEL:** The Organization, Management and Control Model adopted by each Cerved Group company pursuant to Legislative Decree No. 231/2001.
 - **WHISTLEBLOWING SYSTEM or SYSTEM:** The multichannel system used to receive and manage the violation reports subject of this Procedure.

4. General Principles

The functioning of the Whistleblowing System is based on the following fundamental principles:

- **Access:** Only the Intended Recipients of this Procedure (as defined below) can access the System to file a violation report.
- **Duty of independence and professionalism in managing violation reports:** All parties involved, in any capacity, in the whistleblowing management process must perform their respective tasks respecting the independence obligation and guaranteeing an accurate and efficient handling of violation reports.
- **Intended Recipients:** All Cerved Persons and all third parties who interact with the Group are authorized to file violation reports through the System described in this Procedure.
- **Obligation to report unlawful conduct:** The Intended Recipients are required to report the violations of which they become aware or of which they have a reasonable suspicion.
- **Prohibition of retaliatory or discriminatory acts against whistleblowers:** Whistleblowers shall be protected against any direct or indirect retaliatory or discriminatory act related, directly or indirectly, with the violation report; this protection shall be guaranteed for the whistleblower provided that the violation report, while meritless, is nevertheless based on good faith and

reasonableness criteria. Any violation of the abovementioned prohibition shall result in the activation of special disciplinary proceedings. To that effect, the Whistleblowing System Manager, with the support of the Group's Human Resource Function, shall monitor any retaliatory, disloyal or discriminatory behaviors against whistleblowers, through the analysis and overall assessment of the applicable "red flags" (by way of example: changes in office or job description, transfers to a different location, job change requests, long illness related absences, disputes/disciplinary measures, requests for unpaid leaves of absence, negative performance reviews, etc.). Whistleblowers who believe that they were the target of retaliatory behavior due to a previous assessment are encouraged to file a new violation report regarding any retaliation that they suffered. In such cases, a prompt implementation of investigative activities by the Whistleblowing System Manager, with the support of the functions affected by the facts subject of the violation report, is guaranteed,

- **Prohibition to file patently baseless and/or defamatory violation reports:** filing violation reports that are patently baseless and/or filed maliciously with a defamatory intent is forbidden; the filing of patently baseless and/or defamatory violation reports may result in the adoption of disciplinary measures for the protection of Cerved and the party subject of the violation report.
- **Protection of the integrity of violation reports:** The Whistleblowing web portal guarantees that no violation report (from the notification phase to the decision phase) is deleted and/or altered.
- **Protection of the parties subject of the violation report:** Parties who are the subject of a violation report are protected with regard both to the confidentiality of the reports that concern them and any investigations carried out and to any retaliatory and/or defamatory violation reports.
- **Protection of the whistleblower's identity and of the confidentiality of the information:** Cerved guarantees the confidentiality of the whistleblower identity and of the information provided in the violation reports, through all phases of the whistleblowing process, to the extent that anonymity and confidentiality may be demanded pursuant to law; the measures adopted to protect the confidentiality of the whistleblower are aimed, *inter alia*, at ensuring that the whistleblower is not subject to any type of retaliation. The violation of this principle can result in the activation of disciplinary proceedings against the perpetrator of such violation and the imposition of the corresponding disciplinary measures, consistent with the applicable national labor laws.

5. Reportable Conduct

This Procedure is applicable to reports concerning violations that could have an impact on the companies of the Cerved Group and on their business activities.

More specifically, the Whistleblowing System makes it possible to report acts or facts that involve legal representatives, directors, executives and/or employees of the Cerved Group, of companies that are not subsidiaries but in which the Group holds a significant equity interest and of joint ventures and/or, in any case, anyone who operates in the name, on behalf or in the interest of Cerved (by way of example: consultants, suppliers, agents, etc.).

Acts or facts that are the subject of violation reports could concern the following issues:

- with regard to all Group companies
 - ✓ violations of the Group's Code of Ethics;
 - ✓ unlawful conduct relevant pursuant to Legislative Decree No. 231/2001 and violations of the 231 Model adopted by the companies of the Group;
 - ✓ violations of the procedures adopted by the companies of the Group;
 - ✓ violations of the Corporate Governance Code for Listed Companies published by the Corporate Governance Committee of Borsa Italiana;
 - ✓ business integrity issues (e.g., thefts, unfair conduct in the handling of business activities, corruption, improper use of company resources, damaging events that involve customers, conflicts of interest); and/or
 - ✓ financial integrity issues (e.g., insider trading, accounting violations, corporate fraud);
- with regard to Cerved Group companies that engage in credit recovery activities, in addition to the issues listed above with regard to all Group companies, violations of the laws against money laundering set forth in Legislative Decree No. 90/2017, as amended;
- with regard to Cerved Master Services S.p.A., in addition to the issues listed above with regard to all Group companies:
 - ✓ violations of the laws that govern banking activities, understood to mean the main and instrumental activities referred to in Article 10, Sections 1, 2 and 3, of the Uniform Banking Code (including the Oversight regulations for banks issued by Banca d'Italia); and/or
 - ✓ violations of the laws against money laundering set forth in Legislative Decree No. 90/2017, as amended;
- with regard to Cerved Rating Agency S.p.A., in addition to the issues listed above with regard to all Group companies, violations of Regulation No. 1060/2009 of the European Parliament

and Council of September 16, 2009, as amended, concerning credit rating agencies and the internal rules and procedures of Cerved Rating Agency S.p.A.

The abovementioned violations do not have to be reported through the System if they are discovered in the course of an audit or any other investigative activity.

Please keep in mind that the System cannot be used for personal grievances of the Whistleblower or for claims/demands that are covered by the rules governing employment relationships or relationships with a hierarchical superior or colleagues, which should be addressed to the Group's Human Resource Function.

Cerved customers who wish to report problems of a **commercial** nature and/or related to the Group's services can do so using the dedicated channels available on the website www.cerved.com.

6. Whistleblowing Management Process

6.1. WHISTLEBLOWING PORTAL AND ALTERNATIVE CHANNELS

Violation reports must be filed through the Whistleblowing web portal - as it was developed specifically to ensure ease of use, anonymity, confidentiality and privacy, thereby providing the best protection for whistleblowers - accessible from any pc, tablet or smartphone (both personal and company devices).

Whistleblowers can use the **alternative channels** listed below instead of the Whistleblowing web portal:

- **email to the addresses listed below**, accessible exclusively by the Whistleblowing System Manager of each Group company:

- (i) for Cerved Master Services S.p.A.: whistleblowingCMS@cerved.com;
- (ii) for Cerved Rating Agency S.p.A.: whistleblowingCRA@cerved.com;
- (iii) for all other Group companies: whistleblowing@cerved.com;

- **regular mail** to the address for each Group company's respective registered office, to the attention of the Whistleblowing System Manager.

If a modality different from the Whistleblowing web portal is used to file a violation report, in order to benefit from a higher assurance of confidentiality, the violation report must be sent in a sealed envelope marked externally with the words "confidential/personal" or the email's subject line must have the abovementioned wording.

However, the recommendation to use the Whistleblowing web portal cannot be emphasized enough, except when this channel is not available for technical reasons, because:

- i. the use of alternative channels cannot guarantee the same level of protection for whistleblowers and of efficiency in the management of violation reports;
- ii. in the case of anonymous violation reports, using the Digital Whistleblowing Channel is the only modality for requesting that the whistleblower provide clarifications while remaining anonymous, based on the modalities described in Section 6.2. *infra*.

Anyone who receives a violation report through alternative channels instead of the Whistleblowing web portal shall promptly forward it to the Whistleblowing System Manager, or to one of the parties listed below as "Alternative Managers," who shall enter it in the Whistleblowing portal.

In order to prevent the Whistleblowing System Manager from facing one of the situations listed below in connection with a specific violation report:

- i. he/she is hierarchically or functionally a subordinate of the party subject of the violation report;
- ii. he/she is the alleged perpetrator of the violation; or
- iii. he/she has a potential interest related to the violation report that could compromise his/her impartiality and independent judgment;

an Alternative Manager shall be available who can be contacted when the Whistleblowing System Manager is faced with one of the potential “conflict of interest” situations listed above. The **Oversight Board** of the Group company affected in each case shall serve as the Alternative Manager. Communications to the Alternative Manager shall be forwarded, through the Whistleblowing System, directly to the Supervisory Body with jurisdiction in each case.

In the conflict of interest situations listed above, the Alternative Manager shall perform all of the tasks incumbent upon the Whistleblowing System Manager in the violation report management phase; the Alternative Manager can be activated directly by the whistleblower, when sending the violation report, or by the Whistleblowing System Manager during the violation report’s preliminary assessment phase.

6.2.ANONYMOUS VIOLATION REPORTS

Except for reports concerning violations of laws against money laundering, Cerved does not provide the option of filing violation reports anonymously because non-anonymous filings make it easier to interact with the whistleblower and obtain clarifications, while at the same time assuring maximum protection and confidentiality for the whistleblower and protection against retaliatory and/or defamatory violation reports.

6.3.ACCESS TO THE DIGITAL WHISTLEBLOWING CHANNEL AND FILING OF VIOLATION REPORTS

To access the Whistleblowing web portal, all Cerved Persons are issued an identical Access Code, which shall be kept confidential and may not be disclosed to third parties. Likewise, third parties who interact with the Group are provided with a Third-Party Access Code, which is the same for all third parties and different from the Access Code.

The Access Code and the Third-Party Access Code, being the same, respectively, for all Cerved Persons and for all third parties, cannot be used to identify individual users who access the Whistleblowing web portal. This is particularly significant for anonymous violation reports that concern violations of the laws against money laundering.

For anonymous violation reports, whistleblowers shall enter directly in the “fill-in” page of the Whistleblowing portal the discovered violation (filling in all of the required fields).

For violation reports that are not anonymous, whistleblowers must fill in their identification data in the fields provided for that purpose in the fill-in page of the Whistleblowing portal and report the discovered violation (filling in all of the required fields).

The Whistleblowing web portal enables whistleblowers to report the violation selecting the type of unlawful conduct in question (Legislative Decree No. 231/2001, Code of Ethics, Laws against money laundering, Banking regulations, etc.) and specify the affected Group company.

A violation report shall:

- contain a precise description of the facts subject of the violation report and of the persons involved (possible responsible parties and potential witnesses);
- provide additional information, annexing any documents that support the fact subject of the violation, using the document upload function provided for that purpose.

After receiving a violation report, the Whistleblowing web portal renders the data of the whistleblower and the reported violator anonymous, automatically entering them into a separate archive, managed with IT modalities by the Whistleblowing System Manager and accessible only by him/her, where all of the abovementioned data will be stored.

The Whistleblowing web portal will then display initial information confirming the reception and acceptance of the violation report and issue a **univocal identification code** for the violation report, with which the whistleblower can access the Whistleblowing web portal to see any requests for clarification and the violation report's assessment status. This code cannot be used in any way to identify the whistleblower, who can thus remain anonymous and, at the same time, access the violation report to see its status and respond to any request for clarifications.

Whistleblowers are urged to periodically access the Whistleblowing portal to verify the presence of any clarification requests regarding filed violation reports. With regard to this, please note that any request for additional information/clarifications shall be transmitted to the whistleblower within and not later than 20 business days from the communication of the violation report through the Whistleblowing portal.

It is the duty of each whistleblower to diligently safeguard the violation report's univocal code, not to communicate it to others and prevent third parties from accessing information about the violation report.

6.4.ACCEPTANCE OF A VIOLATION REPORT AND PRELIMINARY ASSESSMENT

After receiving a violation report, the Whistleblowing portal shall send a notice of reception of a new violation report (without providing information regarding the content of the violation report) to the email inbox of the Whistleblowing System Manager.

After receiving a violation report (either through the Whistleblowing portal or the alternative channels), the Whistleblowing System Manager shall perform a preliminary assessment and classify the violation report based on its nature.

During this phase, the Whistleblowing System Manager can automatically ignore (“spike”) and not manage violation reports that are patently baseless, malicious or beyond the scope of implementation of this Procedure. “Spiked” violation reports are also stored in the IT archive of the Whistleblowing portal, which does not allow any type of deletion and/or alteration (see Section 9 *infra*). Please note that violation reports that do not fall within the objective scope of implementation of this Procedure shall be treated as if they had not been received and, consequently, will not be taken into consideration in any way nor will they be transmitted to other corporate entities or/functions that may have jurisdiction over the issues subject of the violation reports.

If in the course of managing a violation report there should arise potential conflict of interest situations, the Whistleblowing System Manager cannot “spike” the report, adopting instead measures that are deemed better suited to guarantee the correct handling of the violation report. In such cases, the provisions of Section 6.8 *infra* shall apply.

The violation report acceptance phase must be completed within 10 business days from the receipt of the violation report.

6.5.ASSESSMENT

For violation reports that were not automatically “spiked,” the Whistleblowing System Manager shall verify whether each one of them contains sufficient information to assess its merit; if a violation report that is not patently baseless, malicious or beyond the scope of implementation of this Procedure lacks sufficiently detailed information, the Whistleblowing System Manager shall ask the whistleblower, as appropriate, to provide additional information/clarifications.

These requests for additional information shall be transmitted to the whistleblower within and not later than 20 business days from the communication of the violation report through the Whistleblowing web portal.

After completing this initial assessment and receiving the clarifications deemed necessary, the Whistleblowing System Manager shall:

- close the violation reports that, based on a preliminary review, were found to be baseless and/or not adequately documented despite the clarifications received,

or

- proceed with the investigative phase for violation reports that, after a preliminary verification, were found to be reasonably credible and supported by sufficient evidence to proceed with the investigative phase.

In the latter case, the Whistleblowing System Manager shall define a specific “investigation plan,” spelling out:

- the investigation’s implementation modalities (requests for additional information/clarifications from the whistleblower, performance of verifications deemed necessary, etc.);
- the Group companies and/or company functions that may have jurisdiction based on the subject matter of the territory; and
- the timing for completing the investigation.

The governance bodies of the Group companies and/or company functions involved in the “investigation plan” shall fully cooperate with the Whistleblowing System Manager to the extent necessary to carry out the investigation, consistent with the principles and guarantees provided by this Procedure.

At the end of the investigative phase, the Whistleblowing System Manager shall draw up a report on the outcome of the investigation that was carried out.

In any case, the assessment phase must be completed within 40 business days from receipt of the violation report - except for cases in which violation reports involving particularly complex situations require longer assessment times but not longer than 60 business days - while complying with the principles of impartiality, competence and professional diligence.

6.6.DECISION

Based on the findings of the investigation, the Whistleblowing System Manager shall identify the company function/body with jurisdiction over issuing a decision for each violation report, defining possible appropriate corrective actions to remedy the consequence of the violation and prevent the risk of violations similar to the one subject of the violation report and transmitting to the abovementioned function/body the report drawn up at the end of the investigative phase.

The competent company bodies/function, after reviewing the Whistleblowing System Manager’s report, shall consider possible corrective measure and, if appropriate, recommend disciplinary measures.

Disciplinary measures shall be approved by the Human Resource function of the Cerved Group and must be communicated to the Group company involved (Board of Directors, Chief Executive Officer, other roles/functions that are jurisdictionally competent in each occasion).

With regard to verified violations that are relevant for the purposes of this Procedure, corrective actions and disciplinary measures shall be suggested to the functions/company bodies that are jurisdictionally competent on each occasion.

If the violations concern acts or behaviors performed by members of the Board of Directors, the necessary decisions shall be adopted by the Board of Directors with the input of the Board of Statutory Auditors.

The measures adopted shall be communicated to the Whistleblowing System Manager and the perpetrator of the violation and then officially adopted by the Group Human Resource function or another jurisdictionally competent corporate body, in accordance with applicable national labor laws. The adoption of disciplinary measures shall be communicated to the Whistleblowing System Manager by the jurisdictionally competent corporate body/function.

Disciplinary measures shall be adequate and proportionate to the verified violation, taking also into account any criminal law consequences of the behaviors carried out and shall be consistent with the provisions of the applicable national labor laws.

The Whistleblowing System Manager shall periodically verify the actual implementation of the corrective measures adopted further to the violation reports received and reflect the findings of his/her verifications in a report addressed to the jurisdictionally competent corporate bodies/functions.

6.7.REPORTING

The Whistleblowing System Manager shall draw up at least once a year a report on the results of its activities, for submission to the administration and control bodies jurisdictionally competent in each instance. This report shall contain aggregate information about “spiked” violation reports and the findings from activities carried out in relation to violation reports that were not “spiked. This report shall be approved by the jurisdictionally competent corporate bodies and made available to Cerved Persons through publication on the Company intranet.

6.8.INFORMATION FLOWS REGARDING SIGNIFICANT VIOLATION REPORTS

The Whistleblowing System Manager shall promptly inform the corporate and control bodies of the Group companies affected by the violation report:

- 1) whenever, within the framework of the phases described above, he/she becomes aware of a Significant Violation Report;

- 2) whenever the Whistleblowing System Manager is hierarchically or functionally a subordinate of the party subject of the violation report, he/she is the alleged violator or has a potential interest related to the violation report such that it could compromise his/her impartiality and independent judgement, the handling of the violation report must therefore be entrusted to the Alternative Manager mentioned in Section 6.1 *supra*.

6.9. DISCLOSURE TO THE PARTY SUBJECT OF A VIOLATION REPORT

Within the framework of the various phases of the Whistleblowing System, the Whistleblowing System Manager shall consider the modalities for informing the party subject of a violation report that a violation report has been filed against him/her and about the progress and outcome of the corresponding proceedings.

Specifically, the time when a party subject of a violation report should be made aware of the report shall be determined on a case-by-case basis, verifying whether the transmission of this disclosure could be prejudicial for the performance of the investigation necessary to verify the facts subject of the violation report or whether, instead, the involvement of the party subject of the violation report is necessary for the development of the investigation.

In any event, Cerved shall guarantee the right of the party subject of the violation report to defend himself/herself and be informed (within a reasonable timeframe) of the accusations and any disciplinary measures against him/her.

6.10. PRIVATE INTEREST AND CO-RESPONSIBILITY OF THE WHISTLEBLOWER

The whistleblower shall declare whether he/she has a private interest related to the violation report.

If the whistleblower is jointly responsible for the reported violations, a mitigation of the disciplinary measures shall be applied in his/her favor, proportionate to the contribution provided by the violation report towards the discovery and/or prevention of the abovementioned violations.

The Whistleblowing portal has therefore been configured so as to enable the whistleblower to disclose: (i) the existence of a private interest in relation to the violation report; and (ii) the whistleblower's possible co-responsibility in relation to the acts or facts subject of the violation report.

6.11. REVEALING THE WHISTLEBLOWER'S IDENTITY

The Whistleblowing System Manager is responsible for verifying the resources needed for defense and/or investigation purposes and for making the appropriate decisions regarding the disclosure of the whistleblower's identity, in accordance with the applicable laws.

7. Adoption of the Procedure and Information to Its Intended Recipients

This Procedure shall have the maximum dissemination possible. To that effect, it was:

- approved by the Board of Directors of Cerved Group S.p.A. and is being adopted by each Group company through a resolution by their Board of Directors (or the corresponding corporate body/function/role);
- published on the Company website and intranet; and
- communicated to the whistleblowers through the Whistleblowing portal.

The abovementioned parties shall ensure, for issues under their jurisdiction, the updating of the delivery or transmission of this Procedure in connection with employee turnover and/or changes in the company's ownership structure.

The Human Resource function of the Cerved Group shall make sure, for issues under its jurisdiction, that the modalities to access this Procedure are communicated to all Employees upon hiring.

8. Support and Assistance

For any question, doubts, clarification or advice concerning this Procedure, Cerved Persons shall always contact the Whistleblowing System Manager, who is at their disposal to provide all necessary support.

All assistance requests may also be submitted through the Digital Whistleblowing Channel or via email to the email inbox of the Whistleblowing System Manager mentioned in Section 6.1 *supra*.

9. Traceability of the Violation Report Management Process

The violation reports received (together with any annexed documents), shall be stored in the IT archive of the Whistleblowing web portal, which does not allow any type of deletion and/or alteration.

These documents shall be kept on file for an adequate length of time, but not less than 10 years.

10. Procedure Updates

The Internal Auditing function shall periodically review this Procedure to ensure that it is effective over time and is consistent with best practices, recommending any improvements or additions when they seem necessary. The Legal and Institutional Affairs function and the Human Resource function shall always be included in the revisions process to ensure that the content of this document is always aligned with the most recent legislation, including issues concerning labor laws.