

whistleblowing thyssenkrupp Italia S.r.l.

At **thyssenkrupp Italia S.r.l. (hereinafter thyssenkrupp Italia)** integrity, compliance with the law and internal regulations are of highest priority. To ensure that these values are upheld and potential risks arising from violations are avoided or minimized, it is crucial that misconduct is identified, clarified, and remedied at an early stage. Every indication of a potential misconduct are treated seriously and lead to an investigation following an objective and transparent process without any bias. **thyssenkrupp Italia** therefore makes available to whistleblowers in compliance and under protection of the Legislative Decree No. 24/2023, an internal information system that enables whistleblowers to submit reports.

A detailed description of the thyssenkrupp Italia's whistleblowing rules of procedure can be found <https://www.thyssenkrupp.com/en/company/compliance/whistleblower-system>, within the document Whistleblowing_at_thyssenkrupp._

Who can inform about a violation?

Any natural person (e.g., all current or former employees, shareholders and individuals with administrative, management, control, supervisory or representative functions, as well as nonexecutive members of the company's corporate bodies, suppliers, customers, self-employed workers, freelancers, contractors, subcontractors, consultants, volunteers, trainees) may submit a report on violations acquired in the context of his or her work.

1. What can be reported?

Violations of internal regulations and/or applicable laws (at the national or EU level), including violations of human rights and environmental-related breaches of duty or risks, and the violations of thyssenkrupp Italia's Code of Conduct, thyssenkrupp Italia's 231 Model, and internal regulations (procedures, policies, etc.), can be reported through a variety of channels. Even indications or suspicions of violations can be reported and will be treated seriously. Therefore, in this document "violations" will refer to both actual and potential violations.

2. Who is responsible for dealing with reports?

Thyssenkrupp Italia entrusted the central thyssenkrupp AG Compliance Investigations Department (CO/L&C-INV) as "System Manager" (or "Whistleblowing Officer") to support thyssenkrupp Italia with the tasks of receiving reports and conducting investigations, while ensuring the confidentiality of any information relating to the whistleblower, the individuals mentioned in the report and the subject of the report, in order to prevent potential retaliatory acts of any kind. The Whistleblowing Officer ensures impartiality and independence. Incoming reports, that can also be submitted anonymously, are treated confidentially and whistleblowers are protected by all appropriate means against any disadvantages resulting from a report. The Whistleblowing Officer will align with the OdV of the company if report involves violation of 231 Model.

3. How can I submit a report?

Whistleblowers can submit a report via the following channels:

thyssenkrupp Electronic Whistleblowing System (BKMS)

The Compliance Whistleblowing System of thyssenkrupp can directly be accessed under <https://www.bkms-system.net/thyssenkrupp-it> or by scanning the QR code below:



In addition to the Compliance Whistleblowing System, violations regarding the International Framework Agreement (thyssenkrupp internal HR violations) can also be reported to representatives on the International Committee and the Labor Relations department at thyssenkrupp AG under <https://www.bkms-system.net/frameworkagreement>

Telephone Hotline

thyssenkrupp contact via the following telephone number selecting Italian language (automated telephone dialog):

Phone: +39 02 81480081

Access PIN: 4541

Postal address

thyssenkrupp Headquarters contact via following postal address:

thyssenkrupp AG

-CO/L&C-INV-

thyssenkrupp AG, thyssenkrupp Allee 1, 45143 Essen, Germany

In this case, report should be placed in two sealed envelopes, the first of which should include the identification data of the reporter, together with an identity document; the second envelope should include the subject of the report; both envelopes should then be placed in a third envelope with the words "confidential to the system manager" written outside it.

Face-to-face meeting

Reports can be submitted by requesting a direct meeting with the Whistleblowing Officer, through one of the channels mentioned above.

If a face-to-face meeting is requested, it will be organized within a reasonable timeframe. If the report is submitted orally, with prior consent of the whistleblower, the report is documented by the System Manager in a secure, durable and accessible format, or by a transcript of the conversation. The whistleblower may be given the opportunity to verify, rectify and confirm the minutes of the meeting by signing them. Full confidentiality of the meeting will be ensured.

Contacts within thyssenkrupp Italia S.r.l.[Italian company name]

Company OdV:

Vittorio Zuccoli

Vittorio.zuccoli@studiocifra.it

Via Bragello, 14 21040 – Vedano Olona (VA).

Compliance Manager:

Stefania Pampolini

Stefania.pampolini@thyssenkrupp.com

Via 1° Maggio, 237, Cap 44034, Copparo (FE)

More information on the submission of reports can be found here: [Submitting a report \(thyssenkrupp.com\)](https://thyssenkrupp.com/submitting-a-report)

External Reporting Channels

We encourage whistleblowers to use our internal reporting channels. Whistleblowers also have the option to submit their report to external reporting channels.

In particular, in case the whistleblower has:

- Already made an internal report under Chapter 5 above that has not been followed up within the conditions set forth in that Section; or
- Reasonable grounds for believing that, if he/she made an internal report, it would not be effectively followed up or that the report itself might pose a risk of retaliation; or
- Reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest;

the whistleblower may submit an external report ("External Report") to ANAC (National Anticorruption Authority), according to the channels specially prepared by the latter, accessible at <https://whistleblowing.anticorruzione.it/#/>.

4. Data Protection

While carrying out internal investigations, it will be ensured that the applicable data protection laws are complied with.

Detailed information on the subject can be found <https://compliance.thyssenkrupp.com/dp>