



## Management of the whistleblowing report - Policy

This Group Policy, inspired by the principles outlined in the Code of Conduct, establishes general and foundational principles to promote responsible and secure reporting practices. It describes the "Whistleblowing Report Management" process, of a regulatory and/or ethical-behavioral nature, in compliance with the regulatory framework<sup>1</sup> and the reference Company protocols<sup>2</sup>.

The management of the reports is under the responsibility of the Designated Corporate Functions, appropriately identified according to the relative case.

This Policy shall apply to all Datalogic Group's subsidiaries and affiliates worldwide.

### 1 - DEFINITIONS

**Designated Corporate Functions:** the head of the corporate function designated by the competent Datalogic Group company to manage all or certain Reports.

**Report:** shall mean the communication of the whistleblower, in writing or orally, made in good faith through the dedicated channels described below, concerning any information, including reasonable suspicions, about serious malpractice relating to legal and/or internal control system violations (e.g. Code of Conduct, Organizational Model ex D.Lgs. 231/2001, internal policy and procedures), which occurred or are highly likely to occur in the organisation.

### 2 - SCOPE

In compliance with applicable regulations (from July 2023 for the Italian Entities), regardless of the content of the report and the entity of Datalogic concerned by it, it is always guaranteed that reports can be sent directly to Datalogic S.p.A. or through specific reporting channels set up by subsidiaries in the cases provided for by applicable regulations.

Whichever channel is used, Datalogic guarantees the receipt, analysis and management of reports that are sent, also when it is anonymous. It is possible to send the report through the following dedicated channels<sup>3</sup>:

- voicemail channel through the platform available on the Datalogic website (<https://datalogic.integrity.complylog.com/>);
- meeting with the responsible of the Designated Corporate Functions;
- platform available on the Datalogic website (<https://datalogic.integrity.complylog.com/>).

Reports are taken over and managed by the Designated Corporate Functions according to the compliant provisions of the law, in the relative ways and times, providing for:

- acknowledgment of receipt;
- formal feedback;
- archiving of documentation, in compliance with the applicable law on the protection of personal data.

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<sup>1</sup> Directive (EU) 2019/1937 on whistleblowing.

<sup>2</sup> Company protocols are developed in accordance with the ethical-behavioral principles set out in the Code of Conduct adopted by the Datalogic Group.

<sup>3</sup> Without prejudice to the preferential use of the reporting channels made available by Datalogic, in the cases peremptorily indicated pursuant to article 6 of the Italian Legislative Decree 24 of 10 March 2023, reports may also be submitted to the competent authority in the matter (ANAC).



In order to guarantee an adequate assessment of the reports, the whistleblowers are advised that the related content must be:

- detailed and based on precise and concordant factual elements, as well as free from opinions and assessments of a personal nature;
- without any opportunistic, derogatory, improper or exploitative purpose;
- aimed at protecting corporate integrity.

Any report, if wrongly addressed, will be conveyed to the Designated corporate functions, through the corresponding channel, informing the reporting party thereof.

The Designated Corporate Functions also guarantee:

- to the whistleblower: adequate protection from any retaliation and prejudicial consequences, including the strict confidentiality of his identity, without prejudice to legal obligations;
- to the reported: if the investigation activity requires it, according to the applicable law information about the report received and any initiatives involving him.

The information and personal data provided in the context of the reports are processed for the purpose of managing and following up the reports, as well as investigating any reported conduct and adopting the necessary measures in accordance with applicable laws, including data protection legislation. More information on the modalities and purposes of the processing of personal data included in the reports and collected during the procedure are detailed in the privacy information notices for the whistleblowers and the reported person or other third parties involved in the whistleblowing report that are available on Datalogic's website.

### 3 - RELATED DOCUMENTS

- Code of Conduct.
- Organisational, Management and Control Model, pursuant to Italian Legislative Decree. n. 231 of 2001.
- Group Whistleblowing Procedure.