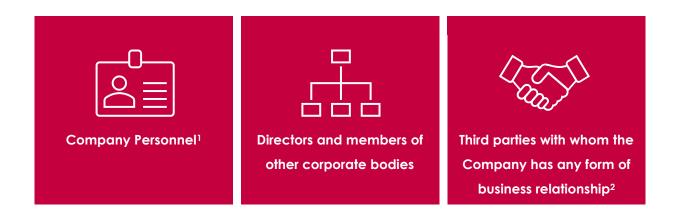


# Whistleblowing System

## Who can report

Reporting can be made by:



#### What to report

A report can be submitted if you are **certain** or if you have a **reasonable suspicion** to believe that a violation has occurred:

- of the Amplifon Group Code of Ethics;
- of the laws applicable;
- of regulations or measures issued by any competent authority;
- of internal policies and procedures adopted by the Group companies (e.g., anticorruption);
- relevant pursuant to Legislative Decree 231/2001 or constituting a violation of the requirements of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001:
- of any other compliance policies and procedures.

<sup>&</sup>lt;sup>1</sup> All employees, interns, paid and unpaid interns, etc.

<sup>&</sup>lt;sup>2</sup> Joint ventures, consortium partners, outsourcing service providers, contractors, consultants and self-employed workers, subcontractors, suppliers, vendors, agents, distributors, representatives, brokers and investors, and their employees or personnel working under their direction and/or supervision, as well as those individuals previously linked to the Company by an employment relationship that has since ended or whose employment relationship has not yet begun.

Furthermore, in accordance with the provisions of **Legislative Decree No. 24/2023**, the following are also subject to reporting:

- offences falling within the scope of application of European Union or national laws (including those which implement European Union law) relating to the sectors indicated in Legislative Decree no. 24/2023;
- acts or omissions constituting fraud affecting the financial interests of the European Union;
- acts or omissions affecting the internal market of the European Union;
- acts or conduct that otherwise frustrate the object or purpose of acts of the European Union in the above fields.



Any reports concerning **personal grievances** and/or **product complaints** from customers are not considered under the Amplifon Whistleblowing Policy.

## How to report

Reports shall:



be based on well-founded reasons;



be as detailed as possible;



contain a precise description of the facts and people involved;



be integrated by **attaching all the available documentation to support** the alleged violation.

The Company has activated the following **reporting channels**:

#### WHISTLEBLOWING



The **Digital Whistleblowing Platform**<sup>3</sup>

COMMITTEE REPORTING CHANNELS



E-mail at wbcommittee@amplifon.com



**Ordinary mail** to the attention of one of the members of the Group Whistleblowing Committee at:

Amplifon S.p.A. via Ripamonti, 133 20141 Milan, Italy



**Verbally** by telephone, through other voice messaging systems, or, upon request, through a direct meeting with the Whistleblower Protection Officer

Channels established to support relevant reports under **Legislative Decree No. 231/2001** are also provided.

SUPERVISORY BODY REPORTING CHANNELS



E-mail at odv@amplifon.com



Dedicated freephone line 800.737762

<sup>&</sup>lt;sup>3</sup> Intended for those who have access to the Company's intranet site.

In addition, Amplifon also ensures the necessary cooperation in the case of any reports received through channels outside<sup>4</sup> the Group for which the relevant independent authority in the country has activated a dedicated channel.

#### Reporting management process

The process of handling reports is guided by the following principles:

- the protection of the confidentiality of all information contained in the reports (including
  the identity of the Whistleblower and any other persons involved in the report);
- the protection of the Whistleblower from any act of retaliation or discrimination, direct or indirect, for reasons related, directly or indirectly, to the reporting;
- the independence and impartiality subjects involved in the handling of reports;
- the disclosure and update on the process of handling reports (acknowledgement of receipt within 7 days of receipt of the report and related feedback within 3 months of the date of acknowledgement of receipt);
- the processing and storage of documents for as long as deemed necessary and proportionate to meet legal requirements.

# **Privacy notice**

Amplifon is committed, throughout the entire management process, to protecting personal data deriving from reports in compliance with applicable privacy laws and in respect of the rights of the persons concerned.

A he extended Privacy notice can be found at the following web address.

<sup>&</sup>lt;sup>4</sup> This possibility is provided only in the presence of the specific conditions identified pursuant to Legislative Decree No. 24/2023. For further details regarding this hypothesis, please refer to the website of ANAC (competent authority).