

Alba Milagro International S.p.A.

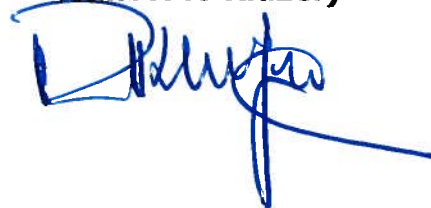
ANNEX 17 to Organization, Management and Control Model
Pursuant to Law (D.Lgs.) 231/01

WHISTLEBLOWING POLICY

Parabiago, 23 February 2018

Alba Milagro International S.p.A.
The President

(Dr. Francesco Kluzer)





Whistleblowing Policy

Alba Milagro International S.p.A. intends to protect its company and those who collaborate with it by setting up a Whistleblowing Policy in fulfilment of the Law 179/2017, approved on the 15th November 2017 for the protection of public and private employee who make reports to inform of any irregular, illegal or fraudulent conduct of which he/she has knowledge within Alba Milagro International S.p.A.

Procedure to be taken in case a report must be promoted

The following detailed procedure can be used to all those who, for whatever reason or cause, should have working relationship, even occasional, with Alba Milagro International S.p.A. and considers useful or necessary to make use of it.

a) Purpose of reports

The law, as mentioned above, covers reports of irregular, illegal or fraudulent conduct committed within or related the workplace.

By way of example but not limited to, you can consider as such:

- Facts or omissions that may complement circumstances considered criminal offences;
- Facts or omissions that may constitute damage to Alba Milagro International S.p.A.'s image and asset;
- Any other behavior which involves a violation of Principles and Protocols of the Management and Control Model, even if only abstractly, adopted by our Company pursuant to and for effects of the Legislative Decree 231/2001;
- Any violation of Corporate laws and regulations;
- Facts or omissions harmful to the health and safety of employees, stakeholders and all those have working relationship with Alba Milagro International S.p.A.

b) The recipients of the procedure

The reports must be addressed to the President's Supervisory Board in charge ex Legislative Decree 231/2001 Dr. Alessandro Malerba, in particular to the following email alessandro.malerba@mct.tax.

Alternatively, reports can be addressed in hard copy to "Studio Dott. Alessandro Malerba" located in Milan - Italy, via Monte Rosa n. 21, CAP 20149.

c) Content of reports



In order to allow the monitoring of the detected illegal, irregular or fraudulent conduct, the report should be complete of each useful element that could be essential for the competent offices to proceed with the due and appropriate verification /investigation on the validity of the reported facts.

For that reason, the report should be therefore as comprehensive as possible and, in particular, must be clearly indicated as follows :

- The whistleblower's identity, with indication of the position or function in the company;
- A clear and complete description of the reported facts;
- If known, the circumstances of time and place of the reported facts;
- If known, the identity or other elements (such as the function of the reported and which service he/she performs for the company) that may allow to identify clearly the entity who has/have the reported facts in place;
- The indication of third parties involved that might refer on the reported facts;
- The indication of any existing document that might confirm the accuracy of the reported facts;
- Any other information that could provide a useful feedback on the real existence of the reported facts.

d) Protection of Privacy

The report will be managed only by the recipients of the procedure in a strictly confidential way.

In line with the provisions referred to in Law 179/2017 and in the existing rules for Privacy, except the case in which it is not possible because of higher law interests, the management of the report will be guaranteed without revealing the reporter's identity (i.e. *Whistleblower*).

Thus, the latter's identity is protected in each context following to the report.

The breach of the confidentiality implies the liability to disciplinary action, without prejudice to further additional forms of liabilities in accordance with the provisions of the Law.

In particular, as regards the context of the disciplinary procedure, the whistleblower's identity can be revealed to the Supervisor's disciplinary authority and to the entity, to which the report relates only, in the following cases:

- There is the expressed whistleblower's consent;
- The arraignment of the disciplinary procedure will result well-based, in part or in full, on the report and the knowledge of the whistleblower's identity will result absolutely essential to protect the entity to which the report relates, if this fact should be assumed by the latter and proved at the hearings or by submitting his/her defences.

e) Ban on retaliation towards the Whistleblower



Towards the whistleblower pursuant to this procedure, it is not permitted or tolerated any direct or indirect retaliatory behaviour or discriminatory measures, which might compromise directly or indirectly any contractual relationship existing with Alba Milagro International S.p.A., in consequence to the report.

Discriminatory measures are understood to include not justified disciplinary actions, harassment in the workplace and any other retaliatory form that may involve intolerable working condition.

Therefore, if the whistleblower, because or prior of his/her report, were to receive threats/warnings of different kinds or get fired, changed job of lower level, unjustifiably transferred, harassed, bullied, etc. - cited as an examples but not limited to them – might appeal immediately to the Supervisory Body ex. Legislative Decree 231/2001.

f) Whistleblower Responsibility.

This procedure is without prejudice to the Whistleblower's criminal and disciplinary liability in case of improper slanderous and libelous reports under the Criminal Code and Article 2043 of the Civil Code.

Sources of responsibilities are also - in penal proceedings and in other competent bodies - any possible form of this policy misuse, such as obviously groundless reports carried out for the sole purpose of damaging the reported or other entities, and any other idea of misuse or intentional abuse of this procedure.

Any abuse of this Policy for the sole purpose of damaging the company or third parties will entitle Alba Milagro International S.p.A. to evaluate the termination of the employment contract and/or *ipso iure*.

Parabiago, 23 February 2018

Alba Milagro International S.p.A.

The President

A handwritten signature in blue ink, appearing to read "F. Kluzer", is written over the printed name.

(Dr. Francesco Kluzer)