



POLICY WHISTLEBLOWING

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	<i>Department / Function</i>	<i>Name</i>	<i>Date</i>	<i>Signature</i>
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1. Objectives and Scope of Application

This Whistleblowing Policy of the SIT Group (hereinafter the "Policy") defines the procedures for reporting violations.

The Policy aims to clearly provide operational guidance regarding the subject, contents, recipients, and methods of submitting reports, as well as the forms of protection guaranteed to the parties involved, in accordance with applicable laws and regulations. SIT is committed to removing factors that may discourage or hinder the use of reporting channels, such as the fear of retaliation or discrimination.

This Policy applies to all directors, managers, and employees of SIT S.p.A. (hereinafter "SIT" or "the Company") and its subsidiaries, as well as to all other parties (hereinafter also referred to as the "Recipients") who collaborate with and act in the name and on behalf of the group of companies headed by SIT S.p.A. ("the Group"), in all countries where the Group operates.

Where local legislation provides for stricter requirements, the individual companies of the Group may define specific procedures and operational guidelines that partially derogate from the principles set out in this Policy, in compliance with applicable laws.



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2. Terms and Definitions

Work Context	Work or professional activities, current or past, through which — regardless of their nature — a person obtains information about violations.
Recipients	All directors, managers and employees of SIT S.p.A. and its subsidiaries, as well as all other individuals who collaborate with and act in the name and on behalf of the group of companies headed by SIT S.p.A. in all countries where the Group operates. By way of example but not limitation, these include: - Members of internal and external administrative and control bodies; - Shareholders, investors, lenders; - Customers; - Suppliers, subcontractors and business partners; - Professionals and external consultants; - Governments, public administrations, institutions, regulators; - Trade unions and trade associations; - Media, universities and research centers.
Facilitator	A natural person who assists a reporting person in the reporting process, operating within the same work context, and whose assistance must remain confidential.
Report Manager	Functions appointed to manage the report received in accordance with the channels defined in this Policy.
SIT Group or Group	SIT and the companies it controls pursuant to Article 2359 of the Italian Civil Code.
Whistleblowing Legislation	The laws governing whistleblowing as referred to in the appendix to this Policy.
Related Persons	Natural persons who have a personal or professional relationship with the reporting person, as defined by the applicable legislation.
Reported Person	A natural or legal person mentioned in the report as the individual to whom the alleged violation is attributed or who is otherwise implicated in the violation.
SIT Group Personnel	Employees of SIT and of the Group companies (at all organizational levels).
Policy	The Whistleblowing Policy adopted by SIT S.p.A.
Retaliation	Any behavior, act, or omission — even if only attempted or threatened — carried out as a consequence of the report and which causes or may cause the reporting person unjust harm, directly or indirectly.
SIT, Company	SIT S.p.A., with registered office in Padua (PD), Viale dell'Industria 34, Tax Code and VAT No. 04805520287.
Reporting Person (so-called Whistleblower)	A natural person who submits a report concerning violations learned in the context of their work or collaboration with the SIT Group.
Report	A written or oral communication made through the procedure described in this Policy, containing information about violations.
Anonymous Report	A report from which it is not possible to derive the identity of the reporting person.
Violations	Behaviors, acts or omissions that constitute breaches of laws and other applicable regulations at any level (local, regional, national, international) that harm the public interest or the integrity of the public administration or any of the Group's companies, of which the reporting persons become aware in a public or private work context.
Whistleblowing/whistleblower	<i>The English term "whistleblower" literally means "whistle blower": a metaphor referring to the role of an umpire or a police officer who calls attention to illicit or illegal activities so that they can be stopped.</i>



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3. General Principles

SIT is committed to complying with the following general principles in the management of the Whistleblowing process and requires that reporting persons and all other parties involved comply with them within their respective areas of responsibility:

- **Confidentiality:** SIT ensures the confidentiality of the reporting person, of the reports themselves, and of the information contained therein.
- **Proportionality:** Investigative activities carried out following the receipt of a report are appropriate, necessary, and proportionate to the purpose pursued;
- **Impartiality:** Reports are analyzed and managed objectively by those responsible for receiving them, regardless of their own opinions or interests;
- **Good Faith:** Protections for the reporting person also apply in cases where the report proves to be unfounded, provided that it was made in good faith — that is, when the reporting person had reasonable grounds to believe that the information regarding the alleged violations was true at the time of submission.

4. Reports

4.1 Which Situations Can Be Reported

Reports may concern conduct that is presumed — not based on mere suspicion but on objective indications — to constitute unlawful acts or violations, such as:

- I. Unlawful conduct relevant under Legislative Decree No. 231/2001 or violations of the organizational and management models provided for therein;
- II. Breaches of laws and other applicable regulations at any level (local, regional, national, international) concerning: public procurement; financial services, products, and markets, and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and protection of personal data; network and information systems security;



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- III. Acts or omissions that harm the financial interests of the European Union or of other countries;
- IV. Acts or omissions concerning the internal market that undermine the free movement of goods, persons, services, and capital — including violations of competition and state aid rules, as well as violations of corporate tax law or schemes designed to gain a tax advantage that defeats the object or purpose of the applicable corporate tax law;
- V. Acts or behaviors that defeat the object or purpose of provisions in the sectors listed above;
- VI. Violations that cause or may cause any kind of damage (e.g., economic, environmental, safety, or reputational) to SIT, its employees, or third parties such as suppliers, customers, business partners, or the external community;
- VII. Violations identified as relevant under locally applicable whistleblowing laws.

Furthermore, ethical or compliance issues may be reported if they are presumed — not based on mere suspicion but on objective indications — to constitute violations of:

- the values and principles set out in the *Code of Conduct*, the *Anti-Corruption Policy*, or the *Ethical Code for Suppliers and Third-Party Intermediaries*;
- Group Policies and Procedures (including but not limited to the *Diversity and Inclusion Policy*, the *Human Rights Policy*, and the *Plan for the Prevention and Management of Harassment and Abuse*);
- internal control principles.

By way of example but not limitation, reports may concern presumed — not based on mere suspicion but on objective indications — misconduct relating to the following matters:

- Administrative, accounting, or tax management;
- Corruption, fraud, embezzlement, money laundering and self-laundering;
- Conflict of interest;
- Discrimination, harassment, mobbing, and other labor law issues;
- Gifts and gratuities;



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- *Information Security;*
- *Privacy,*
- *Environment, health, and workplace safety.*

The following are excluded from the scope of whistleblowing:

I. Clearly unfounded information, facts already entirely in the public domain, or information obtained solely through unreliable rumors or gossip ("hearsay").

Instrumental or manifestly groundless reports may be archived with justification and, in serious cases, reported to the DPO or the employer.

II. Complaints, grievances, or personal requests by the reporting person (or by someone who has already filed a complaint with the judicial or accounting authority) that concern exclusively their individual employment relationship or hierarchical relations.

III. Violations already mandatorily governed by EU or national acts indicated in Part II of the Annex to the Legislative Decree, or by national acts implementing EU legislation listed in Part II of the Annex to Directive (EU) 2019/1937, even if not explicitly mentioned.

III. Violations concerning national security or contracts relating to defense or national security matters, unless such aspects fall within the relevant derived EU law.

Reports falling into these categories, if erroneously submitted through the Whistleblowing channel, will be returned to the sender with an indication of the appropriate management channel.

4.2 Content and Submission of Reports

Recipients who become aware of violations are encouraged to promptly report the facts, events, and related circumstances.

Reports must meet the following requirements:

- i. Be made in good faith;
- ii. Be detailed and based on precise and consistent factual elements;
- iii. Concern verifiable facts personally known by the reporting person;



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- iv. Contain all the information necessary to identify the authors of the reported facts or conduct and any other information useful to describe the subject of the report.

Where possible and when known to the reporting person, the report should include:

- The name of the reporting person and contact details for further communication; however, reports may also be submitted anonymously, and SIT guarantees adequate means for anonymous reporters to monitor their reports while respecting their anonymity;
- A detailed description of the events that occurred (including date and place) and how the reporting person became aware of them;
- The law, internal regulation, etc., believed to have been violated;
- The name and role of the person(s) reported, or information allowing their identification;
- The name and role of any other individuals who may provide information about the reported events;
- Any documents or other evidence that may support the reported events.

Manifestly unfounded, opportunistic, and/or malicious reports, as well as any other misuse or instrumental use of the reporting mechanism, are prohibited, will not be taken into consideration, and may result in sanctions and/or actions before the Judicial Authority as provided by the applicable law of the relevant State. In cases of slanderous or defamatory reports, the reporting person acting in bad faith may be held criminally liable, and disciplinary proceedings may be initiated against them.

4.3 Who Can Make a Report

Reports referred to in paragraph 4.1, concerning violations known within the context of one's work activity or collaboration with the SIT Group, may be submitted by all Recipients of this Policy as defined above.

Reports may relate to facts or circumstances of which the reporting person became aware: Before the employment or collaboration relationship began, if the information about the violations was acquired during the selection process or in other pre-contractual stages; During the probationary period; While the employment or collaboration relationship is ongoing, After the termination of the employment or collaboration relationship, if the



information about the violations was acquired during the relationship itself.

4.4 Protection Regime Granted

Adequate safeguards are ensured for reporting persons, in particular with reference to the confidentiality of their identity and the confidentiality of the information contained in the report, from the moment of receipt and during all the phases of the report management, within the limits provided for by the applicable legislation.

Where possible the report must include the name of the Reporting Person and contact details for further communications; however, reports may also be submitted anonymously, and SIT guarantees to anonymous Reporting Persons adequate means to monitor their reports while respecting their anonymity.

The identity of the reporting person and any other information from which such identity may be inferred, directly or indirectly, cannot be disclosed, without the express consent of the Reporting Person, to persons other than those competent to receive or to follow up on the reports.

No form of retaliation (for example, dismissal, suspension, lack of promotion, demotion, etc.), discrimination or penalization is permitted against the Reporting Person or anyone who has taken part in the investigation, for reasons directly or indirectly connected to the report. It is also specified that the protections mentioned above are reserved for the Reporting Person who submits anonymous reports, should he/she later be identified and suffer retaliation.

The protections described are also extended to the Facilitators of the report as well as to the Related Persons identified by the applicable legislation; finally, adequate forms of protection ensuring confidentiality are also provided, within the limits established by the law in the matter, to the persons allegedly responsible for the reported conduct or violations.

4.5 Reporting Channels

A report may be submitted using multiple channels:

- a) **IT platform "Signaletic"** (<https://sitgroup.signaletic.it/signaletic/home>)

The tool, centrally managed by Headquarters, is shared by all the companies directly or



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indirectly controlled by SIT S.p.A..

The platform allows the insertion of text and/or the upload of audio files (e.g., voice messages in .mp3 or .wav format).

The reporting person must indicate the SIT Group company for which the report is intended.

b) Oral form through in-person meeting

The Reporting Person may request an in-person meeting with the Report Managers, or, in the case of unlawful conduct relevant under Legislative Decree no. 231/2001, with the Supervisory Body (OdV).

Email references for requesting a meeting are provided in Appendix B (Contact List).

c) Traditional written form (ordinary mail)

To ensure maximum confidentiality of identifying data, paper reports must be packaged as follows:

1. Prepare two sealed envelopes:

- **First envelope** – containing the identifying data of the Reporting Person together with a copy of an identity document;
- **Second envelope** – containing only the report, without any elements that would allow the identification of the Reporting Person.

2- Insert both envelopes into a third sealed envelope bearing on the outside the wording **"CONFIDENTIAL"** addressed to the report manager (e.g., "Confidential to the RPCT").

3- Send the outer envelope to the address: "SITS.p.A. – Viale dell'Industria 34 – 35129 Padova (PD)" – to the attention of the Human Resources Department or the Governance & Legal Department or the Internal Audit Manager, depending on the subject matter. It should be noted that if one intends to report unlawful conduct relevant under Legislative Decree no. 231/2001, the communication must be addressed to the attention of the



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Internal Audit Manager.

The report received in this way will be subject to confidential registration, also by means of a separate register, by the report manager.

The contents of reports received through the IT platform by uploading audio files, through oral form, or through written form by ordinary mail, will be promptly transcribed by the report manager into the register of reports on the "Signaletic" platform, also indicating the origin of the report itself.

All the channels listed are designed and managed securely, in order to prevent unauthorized personnel from accessing information and to ensure that the identity of the Reporting Person and other individuals involved in the investigations remains confidential.

Anyone who receives a report falling within the scope of this Policy outside of the dedicated channels, for any reason and by any means, must ensure the confidentiality of the information received, having the obligation not to disclose the identity of the Reporting Person, of the Reported Person, or of any other person mentioned in the report, nor any information that could make it possible to identify them, directly or indirectly.

Furthermore, as specified in paragraph 6 of article 4 of Legislative Decree 10 March 2023, no. 24, "an internal report submitted to a person other than those indicated in paragraphs 2, 4 and 5 shall be transmitted, within seven days of its receipt, to the competent person, simultaneously notifying the reporting person of the transmission."

Finally, any information related to the report must be deleted once the report has been forwarded, as soon as confirmation of receipt by the Report Manager has been received.

As a priority, reporting persons are encouraged to use internal channels and, under the specific conditions provided by applicable law, may submit an external report directly to the competent Authorities according to the legislation applicable at local and/or international level.

4.6 Management of Reports

The Company ensures that reports, regardless of the channel through which they are received, are managed ensuring maximum confidentiality and privacy, data protection, and



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absence of conflicts of interest. For this purpose, a specific internal procedure has been prepared for the management of reports aimed at verifying the facts, involving the Human Resources Department, the Legal Department, and the Internal Audit Manager. The Departments responsible for managing the reports are required to perform their function in good faith and professionally, managing the reports with due diligence; they may perform other tasks and duties in addition to managing reports, provided that this does not create a conflict of interest.

In the case of reports received through the reporting channels governed by this procedure and relating to unlawful conduct relevant under **Legislative Decree no. 231/2001**, or violations of the organizational and management models provided for therein, the report manager is required to:

- promptly forward the report to the Supervisory Body (OdV) of the relevant company;
- refrain from carrying out any investigation before the involvement of the OdV;
- keep the documents on the platform and/or in the specific registers according to the rules established with the OdV.

If the report is addressed against one of the Departments involved in the assessment procedure, that Department shall be immediately excluded from it.

Once a report has been received:

- a) an acknowledgment of receipt of the report shall be issued to the Reporting Person within seven (7) days from the date of receipt;
- b) communication with the reporting person shall be maintained, and additional information may be requested if necessary;
- c) due follow-up shall be given to the reports received, according to the principles of confidentiality, timeliness and impartiality, by evaluating the report received and carrying out the necessary checks to verify whether, based on the available elements, a violation has indeed occurred;
- d) a response to the report shall be provided within three (3) months from the date of the



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acknowledgment of receipt or, if no acknowledgment is given, within three (3) months from the expiry of the seven (7) days following the submission of the report.

If it can be assumed that the facts contained in the report constitute a crime, the report manager shall assess, in agreement with the other competent corporate functions and the Group management, whether and when the information contained in the report should be notified to the competent Judicial Authorities, also based on the locally applicable legislation. Reports received, the related checks and analyses, and all reference documentation shall be retained for the time necessary to process the report and, in any case, no longer than the period provided for by the applicable legislation, starting from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations.

The Reported Persons are guaranteed the right of defense and/or to be informed of the outcome of the investigation, within the limits established by the applicable local legislation.

5. Monitoring

The functions in charge periodically report on the number and type of reports received and on the outcome of the activities carried out to the competent bodies, as well as to the statutory control and supervision bodies at local level (where present), ensuring the anonymity of the persons involved.

As part of this activity, an assessment will also be made as to whether the procedure described in this Policy is effective and achieves the defined objectives. If there are indications of changes in the operating environment or of other elements that negatively affect the effectiveness of the reporting process, SIT will consider possible amendments to the process itself.

6. Approval of the Policy and Subsequent Revisions

This Policy has been approved by the Board of Directors of SIT S.p.A.

The functions responsible for managing the reports, as defined above, are in charge of the periodic review and update of the Policy and of proposing any changes that take into account the evaluations of the Stakeholders. During the review process, the Ethics and Equal Opportunities Committee of SIT may also be involved.



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Substantive amendments to the document, if necessary, will be submitted for approval to the Board of Directors of SIT S.p.A., in agreement with the CEO & Chairman and the Corporate Sustainability Director.

Edition	Date	Description of changes	Release
1.0	09/11/2023	First Draft	09/11/2023
1.1	10/10/2025	Update	10/10/2025



APPENDIX

Regulatory References

a) Whistleblowing Legislation

The practice of reporting irregularities has existed since ancient times, but only in recent decades has it taken on a significant role in public debate and in the legislation of many countries. Its growing importance is the result of a series of historical events that have highlighted the need to protect and support whistleblowers in their important role as guarantors of transparency and institutional accountability.

Whistleblowing legislation has evolved over time and is a dynamic process in which the European Parliament has also decided to intervene in order to establish common general principles for all Member States.

For the purposes directly related to this Policy, the main references to national and international legislation and conventions, applicable in the main countries where the Company operates, are cited below by way of example and not limitation:

- Directive (EU) no. 2019/1937, which provides European protection for Whistleblowing;
- Legislative Decree no. 24/2023, implementing the EU Directive on Whistleblowing;
- *General Data Protection Regulation (EU) 2016/679, concerning the protection of personal data;*
- Legislative Decree no. 196/03, as amended by Legislative Decree 101/20, concerning Privacy.

b) Internal Regulatory References

This Policy must be read and interpreted in light of the policies and procedures in force within the SIT Group.

These policies form an integral part of the Policy and are available on the SIT corporate website (www.sitcorporate.it) and on the company intranet (We@SIT).

Specifically, reference is made to the following documentation:

- "Code of Ethics" of the SIT Group;
- "Ethical Code for Suppliers and Third-Party Intermediaries";
- "Code of Basic Working Conditions" of the Group;



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- "Code of Non-Discrimination and Diversity" of the Group;
- "*Human Rights Policy*" of the Group;
- "Procedures for the Selection and Recruitment of Personnel";
- "*Diversity & Inclusion Policy*";
- *Antitrust*
- *Anti-Corruption*
- *H&S*

- Organizational, Management and Control Models of SIT S.p.A. and Metersit S.r.l. under Legislative Decree no. 231/2001 ("Model 231") for the Italian companies of the Group;
- "Plan for the Prevention and Management of Harassment, Violence and/or Discrimination in the Workplace".



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Appendix A

List of Companies Included in the Whistleblowing Scope

Company Name	Country	Location
SIT S.p.A.	Italia	Padova
Metersit S.r.l.	Italia	Padova
SIT Controls BV	Olanda	Hoogeveen
SIT Controls USA Inc.	USA	Charlotte
SIT Controls Deutschland GmbH	Germania	Arnsberg
SIT Controls CR, S.r.o.	Rep. Ceca	Brno
SIT Manufacturing N.A. Sa de CV	Messico	Monterrey
SIT Controls Canada Inc.	Canada	Ontario
S.C. SIT Romania S.r.l.	Romania	Brasov
SIT Manufacturing (Suzhou) Co. Ltd	Cina	Suzhou
JANZ – Contagem e Gestão de Fluídos, SA	Portogallo	Lisbona
Plast Alfin S.a.r.l.	Tunisia	Ben Arous
Sit Controls Tunisia S.u.a.r.l.	Tunisia	Tunisi
Sit Metering S.r.l.	Italia	Padova
Metersit UK Ltd	Regno Unito	Manchester
SIT Motors & Blowers Technology S.r.l.	Italia	Padova



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Appendix B

1- List of Report Managers (Contact List)

Role	Function	Contact (e-mail)
Human Resources Director	HR	roberta.fagotto@sitgroup.it
Legal Affairs Director	Legal	egidio.vettoretti@sitgroup.it
Internal Audit Manager	Internal Audit	tobia.pedata@sitgroup.it

*For reports relating to unlawful conduct relevant under Legislative Decree no. 231/2001, the competent Report Manager — with whom an in-person meeting with the Supervisory Body (OdV) may be requested — is the Internal Audit Manager.

2- List of Report Managers (Contact List) for reports relating to unlawful conduct relevant under Legislative Decree no. 231/2001

Internal Audit Manager	Internal Audit	tobia.pedata@sitgroup.it
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