

WHISTLEBLOWING SYSTEM AND PROCEDURE

1. PURPOSE

This procedure is adopted to adapt corporate compliance to Legislative Decree 24/2023, the implementing law of EU Directive 2019/1937, which came into force on 15/07/2023. The additional reference legislation is EU Reg. 679/2016 and Privacy Code Legislative Decree 196/2003.

In complying with the regulations mentioned above, RESIDENCEHOTELS SPA pursues the higher purpose of spreading the culture of legality in its society and of creating a widespread control system at each hotel facility entrusted to the attention and work ethics of each employee, or self-employed, who is thus involved in the direct and active monitoring of administrative offenses, accounting, civil and criminal charges that may be committed in the context of work activities and/or services rendered to the guests of each facility.

2. PURPOSE of the REPORTING PROCEDURE

The purpose of this procedure is to illustrate, in a simple way, the methods of reporting intra-company offences and to make the reporting system adopted accessible to each user, from access to communication, from the possible adoption of actions that each structure involved is eventually called upon to undertake.

Specifically, with this procedure, the company aims to create an adequate system of protection for persons who report offences committed in the workplace to the detriment of RESIDENCEHOTELS SPA itself and/or the community and community, so as to make it possible to use the reporting channel confidentially, serenely and securely, which annuls hierarchical relationships between all collaborators and gives sufficient confidence to submit a report of unlawful also to those who may fear retaliatory or negative consequences for themselves, for having reported the objectively incorrect, unjust, dangerous behavior of another collaborator or work colleague.

The protection granted includes the protection of the confidentiality of the whistleblower's identity, as well as the protection of the whistleblower's person, if any, from retaliation or disciplinary measures taken against him or her as a result of the report.

3. GENERALITY

The so-called whistleblowing is an internal system of the company for reporting administrative, accounting, civil and criminal offenses or violations of corporate organizational models, committed in the workplace.

The system provides that every worker and collaborator, including external collaborators, can report to an autonomous and dedicated office the commission of offenses or violations that harm the national public interest or the interests of the private company for which he or she works and of which he or she has become aware in the context of work and in the course of his or her activities.

Upon receipt of the report, the office in charge verifies the report by conducting an internal investigation and assists the company in identifying the activities to be carried out in order to ensure the most adequate corporate protection in relation to the reported offense, including the activation of any suitable protection mechanism for the entity and the company, or the publication of the report by reporting it to the competent authorities.

4. APPOINTED OFFICE

RESIDENCEHOTELS SPA has entrusted the management of its reporting channel to an external, independent, autonomous and dedicated receiving body, competent to receive reports of potential offenses and to manage them in compliance with the regulations referred to in Legislative Decree 24/2023. The receiving entity has direct access to the reporting channel and autonomously assesses the case concerning each report received, with the power to carry out internal investigations and in particular to

1. convene and confer with the report;
2. find at the structure involved, the relevant and useful documentation for the evaluations of the case, in a confidential manner and at the simple request of the director of the individual hotel/residential facility.

5. REPORTING CHANNEL

RESIDENCEHOTELS SPA has deemed it appropriate to make available to its employees and collaborators an internal IT reporting channel, through a digital platform, which can be reached through the company's website.

The submission of the report to the receiving entity can be done in the following ways:

- **in writing:** by sending the report through the dedicated platform (and accessible at the link <https://rhwhistleblowing.effizient.it>);
- **orally:** at the request of the whistleblower made through the platform, by means of a phono-recorded statement, collected during a direct meeting with a person delegated by the receiving entity, a meeting scheduled within 5 working days at a reserved place outside the structure where the whistleblower works or collaborates.

The other communication channels used by RESIDENCEHOTELS SPA remain functional and collaborators or other persons authorized to use them may continue to use them. It should be noted that any reports submitted through these channels will not be covered by the safeguards set out in whistleblowing legislation.

6. CHANNEL ACCESSIBILITY

Access to the reporting channel is available to every member and shareholder, employees including trainees and volunteers, every employee of the company whether self-employed or professional or consultant, and any person who works within the company with administrative, management, control, supervisory, or representation functions. Access to the receiving channel and management of received reports is allowed only to the receiving entity.

7. SUBJECT OF THE REPORTS

The reporting channel is expressly dedicated to the reporting of administrative, accounting, civil, and criminal offenses or offenses that expose the interests of the community, the interests of the company, the company's assets, the company's activity as well as each hotel and residential facility to damage or danger. The channel serves, therefore, to report crimes, offenses, or violations committed in the workplace to protect RESIDENCEHOTELS SPA and the subjects who, potentially, are victims.

On the other hand, it is not used to submit complaints or disputes related to the personal interests of the individual whistleblower, nor to submit complaints from external parties, guests, or customers, relating to the services received at the facility.

Any reports with a subject other than that of Legislative Decree 24/23 as specified herein or having a purely personal nature received through the whistleblowing channel will be justifiably rejected with an invitation to the whistleblower to address them to the internal offices competent to process them.

8. WHISTLEBLOWING MANAGEMENT

The receiving entity receives the reports, manages and sorts them, follows them up by carrying out any appropriate checks aimed at responding to the report, guaranteeing the confidentiality of the reporting party, providing the reporting party with protection from possible retaliation, activating at RESIDENCEHOTELS SPA or having the competent authorities activate any further useful and necessary procedure for the resolution of the report or the processing of the unlawful act. **Within 7 days** of receipt of the report, the receiving entity shall issue a "notice of receipt of the report" to the whistleblower.

Within the following 3 months, the receiving entity will process the report and give feedback to the reporting person on the follow-up that will be given to the report received.

During the processing of the report, the receiving entity:

- maintains, where necessary, interlocutions with the person of the whistleblower;
- asks the whistleblower for clarifications or additions to the report.

For the processing and conduct of the internal investigation, the receiving entity may hear the whistleblower, request and obtain copies of documents, videos, and computer data recorded on the internal management systems of the company RESIDENCEHOTELS SPA.

The receiving entity shall inform the Chairman of the Board of Directors and the Director of the Structure of the internal investigation of the results of the internal investigation, who are competent to adopt the necessary measures and provisions.

9. PROTECTION OF THE CONFIDENTIALITY OF THE WHISTLEBLOWER

The protection of the confidentiality of the whistleblower is provided throughout the proceedings and all civil, criminal or disciplinary proceedings resulting from the report.

The receiving entity is required to maintain the secrecy of the identity of the whistleblower, except for disclosing it for reasons of necessity and exclusively to the persons competent to receive and follow up on the reports, also except in cases of need to reveal the personal details of the whistleblower or the express consent of the whistleblower.

In criminal proceedings, the identity of the whistleblower may be revealed to the prosecuting judicial authority in accordance with the provisions of the law and at the request of the same authority, which may acquire the entire company file relating to the report.

In internal disciplinary proceedings following a report, the identity of the whistleblower cannot be revealed if the charge is based on separate and different findings from the report alone. If, however, knowledge of the identity of the whistleblower is necessary for the defense of the accused person, this may only be revealed with the whistleblower's consent.

In all cases where it is necessary to disclose the identity of the whistleblower, the office in charge shall send the whistleblower a reasoned written communication.

10. ADMISSIBILITY and MANAGEMENT of ANONYMOUS REPORTS

RESIDENCEHOTELS SPA admits the possibility of making reports anonymously, even if they are not considered for the purposes of the legal protection provided for by Legislative Decree 24/23, provided that they provide sufficient elements to reconstruct the reported fact and to verify the reported offense. Reports made anonymously will be handled as a complaint only. If the anonymous report still allows the identification of the whistleblower and falls within the scope of the whistleblowing system, the receiving entity will manage the report with the appropriate safeguards.

11. BAD FAITH, FALSE or SLANDEROUS REPORTS

The protection of the confidentiality of the whistleblower is, in any case, excluded for reports made in bad faith, manifestly false or that are false and, in general, for slanderous reports. The false reporting and attribution of offences to a person who is known not to be guilty or who turns out to be false as a result of the internal investigation, involves the disclosure of the reporting identity to the accused, so that the latter provides for his personal protection in every appropriate place and involves, at the company headquarters, the opening of disciplinary proceedings against the reporting party.

12. PROCESSING OF PERSONAL DATA / MANAGEMENT, DOCUMENTATION, STORAGE and CANCELLATION of REPORTS

The personal data of the reporting person are processed in compliance with the privacy law and the rights guaranteed by the European regulation Reg. EU 679/2016. The rights referred to in Articles 15 to 22 of the Regulation (access, rectification, modification, cancellation, oblivion, opposition) may not be exercised by means of a request to the data controller or by complaint pursuant to Article 77 of the Regulation, if the exercise of these rights may result in an actual and concrete prejudice to the confidentiality of the identity of the employee who reports the offence of which he or she has become aware by reason of his or her work.

Any report may not be kept longer than is necessary for its processing and adequate follow-up.

The report, therefore, is stored in digital and/or paper form at the dedicated internal office, and is kept for all and only the time necessary for its processing and to give feedback, or for the time necessary for the processing of the resulting proceedings.

The report is archived after data minimization and is deleted after 5 years from the archiving.

13. INFORMATION and TRAINING on the PROCEDURE

RESIDENCEHOTELS SPA has prepared an information note on the adoption of the reporting system combined with the publication of a breviary in the form of F.A.Q. "frequently asked questions on the procedure" that inform and train collaborators and employees on the internal reporting system and on the use of the available channel.

These information supports are also published and disseminated on the physical company bulletin boards at each hotel or residential facility and the related contents are easily accessible on the company's digital information systems.

14. PUBLICITY of the PROCEDURE

On the website of RESIDENCEHOTELS SPA, in a special section called "whistleblowing" with a reference at the bottom of the page, this procedure is published (also including the access link to the reporting platform) and the F.A.Q. prepared.

15. PROCEDURE UPDATE

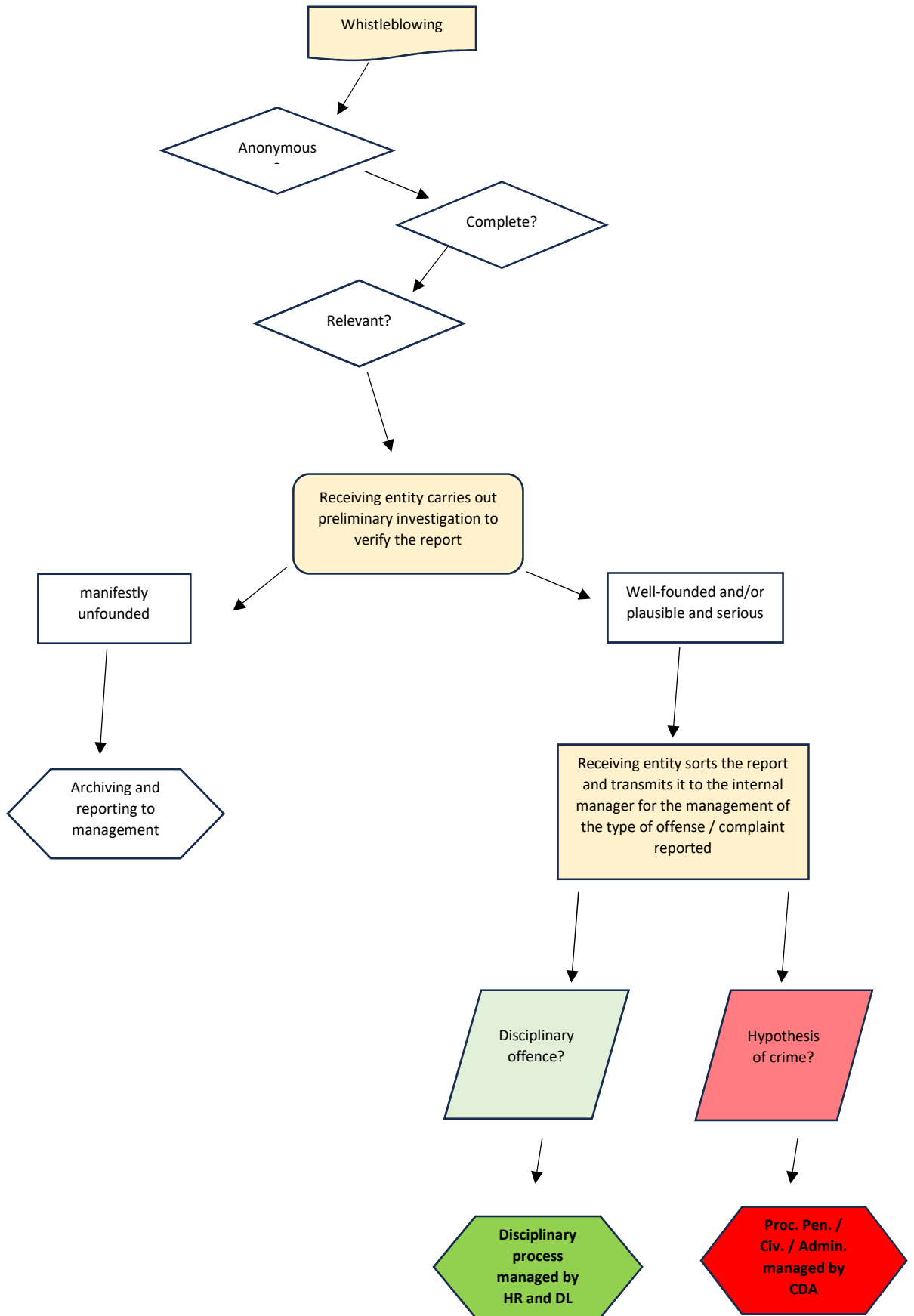
This procedure is subject to updating following changes in national or European regulations on whistleblowing, the introduction or significant update of ANAC provisions or Guidelines or changes in corporate organisational needs. The procedure is subject to review at least every 3 years.

16. SANCTIONS TO PROTECT THE WHISTLEBLOWING SYSTEM

To protect the proper functioning of the whistleblowing system and the correct behaviour of the parties involved in its implementation, RESIDENCEHOTELS SPA has provided for the following specific sanctions:

- for the violation of the prohibition to carry out retaliatory or discriminatory acts against the whistleblower, as well as for the violation of the measures to protect the confidentiality of the whistleblower, the Company applies the type of sanction provided for by the type of perpetrator (internal employee or external independent collaborator) by the applicable CCNL or by the applicable contract, with the exclusion of the mere verbal or written reprimand;
- for the report made with wilful misconduct or gross negligence on the part of third parties and which proves to be unfounded, the Company applies the type of pecuniary sanction provided for by the type of perpetrator (internal employee or external independent collaborator) by the CCNL or by the applicable contract; the Company also discloses the report and the identity of the whistleblower to the accused so that the latter can personally initiate the appropriate judicial protections.

17. GENERAL FLOW CHART REPORTING MANAGEMENT



18. ANNUAL REPORT

In its annual report to the Board of Directors, the receiving entity shall indicate the number, relevance, seriousness, subject matter and results of the reports received, indicating the activity and type of investigation carried out and the results of the activity carried out.

19. WB SYSTEM DOCUMENTS AND FORMS

RESIDENCEHOTELS SPA has set up the following documentation and supporting forms for the management of the whistleblowing system:

1. Doc. WB01_Procedura
2. Doc. WB02_Formulario for use by the receiving institution
3. Internal Information WB03_Comunicato Doc.
4. Doc. WB04_FAQ whistleblowing