

Abstract

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1 1 Purpose / Field of application / Addressees

Abioten Pharma S.p.A. in order to maintain an ethical and transparent working environment ensures clear, safe and accessible channels for reporting any alleged violation of the principles of gender equality within the organization. This procedure defines the procedures for reporting, receiving, analysing and processing acts, behaviour, risks or situations (actual or potential) which constitute or may constitute direct or indirect discrimination, harassment (including sexual), bullying, gender-based violence or any other violation of the principles of gender equality and equal opportunities within the organisation with the aim of preventing, identify and correct any discriminatory or prejudicial behaviour to the equality between men and women in accordance with the company's Policy for Gender Equality, the applicable regulations (including D.Lgs. 198/2006 "Equal Opportunities Code") and the reference practice UNI/PdR 125:2022.

The warning system can be activated by:

- Employees with any type of contract (including former employees and candidates)
- Members of the corporate bodies (directors, mayors)
- Third parties that have a relationship with the organisation (e.g. employees, suppliers, customers, consultants, partners).

1.1 Terms and definitions

Gender Equality Alert:	Communication, made in good faith, concerning alleged violations of the principles of gender equality such as discrimination, harassment, gender-based bullying, violence, sexist language, unjustified unequal treatment, career barriers related to gender, etc.
Reporting Subject	The natural person issuing the alert
Signalled	The natural or legal person to whom the reported Conduct is attributed
Internal Gender Equality Contact (RMM):	Internal figures of the company member of the Steering Committee for Gender Equality, HR Director and his backup, specifically responsible for receiving reports (in anonymised form and not or with the necessary data, respecting privacy) and to coordinate the internal investigation.
Gender Equality Steering Committee (CGPG):	Corporate body responsible for overseeing gender equality policies and initiatives, including monitoring the reporting process.

For further definitions please refer to the UNI/PdR 125:2022 Reference Practice

1.2 Object of the reports

Reportable violations include, but are not limited to:

- Forms of direct or indirect discrimination based on gender.
- Molestie sessuale o molestie basate sul genere (verbali, fisiche, visive, online).
- Sexist or discriminatory language or communication.
- Unequal distribution of tasks or responsibilities based on gender stereotypes.
- Retaliation against those who reported violations or participated in investigations.
- Failure to implement gender equality policies.
- Any other conduct that creates a hostile, intimidating or humiliating gender-based work environment.

Reports should not be limited to personal matters or individual complaints to colleagues or superiors.

1.3 Channels and mode of signalling

Abioten Pharma S.p.A. has structured the following reporting methods:

- Anonymous report;
- Confidential report;

Both modes are managed with the utmost confidentiality and in compliance with current regulations.

1.3.1 Signalling channels

Abioten Pharma S.p.A. has adopted the following reporting channels:

- **Computer channel:** through the use of the dedicated online platform Parrot Whistleblowing, accessible by typing the following URL: abiogen.parrotwb.app. and using the methods provided for in Annex 2 to the Whistleblowing Procedure, which can be found at the following link Parrot Software.

In the platform, in order to ensure a correct identification and preliminary management of the report, in the subject of the report (to be specified by the reporter), it must be indicated "**Gender Equality Violation**".

- **Traditional mail:** writing to ABIOTEN PHARMA S.P.A. Via Meucci, n° 36, 56121 Pisa - PARITA' DI GENERE with the indication "**Report Gender Equality Violation Abioten Pharma S.p.A.- Confidential**".
- **E-mail:** paritadigenere@abiogen.it
- **Oral channel:** through the channels above it is possible to request a meeting directly with the Steering Committee for Gender Equality in the person of the RMM specifying in the meeting request if the report concerns **Violation of Gender Equality**.

It is also possible to request the meeting by contacting directly at the following addresses:

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HR Director - RMM

- **Antonella Mannocci**

And her backup

Head of the Personnel and Organization Sector and RSGPG

- **Paola Pontini**

Contact details	
Antonella Mannocci Tel. 050.3154213 Cell. 348.4056477	Paola Pontini Tel. 050.3154308 Cell. 348.3977102

The person designated to receive the report through the Parrot portal is the company SiQuAm SRL that, ascertained the nature of the report will act promptly to forward it to the member of the Committee Guide for gender equality in charge (RMM), in the person of Antonella Mannocci and her backup Paola Pontini.

The "Gender Equality Violation" label serves to facilitate this sorting and ensure that the report is handled, coordinated and monitored by members of the Gender Equality Steering Committee.

1.3.1.1 Content of the report

To be effective, the report should contain as much as possible:

- A clear and detailed description of the facts, behaviour or situations reported.
- The circumstances of time and place in which they occurred.
- The generalities or other elements that allow to identify the subjects involved (Signalled), if known.
- Any supporting documents or evidence.
- An indication of any other persons aware of the facts.

Note for anonymous reports: The more detail provided, the greater the chance that the alert can be effectively verified and investigated, even in the absence of direct contact with the reporting person.

1.3.1.2 Process for handling reports

a) Reception and Recording

If the report is made through the Parrot portal, SiQuAm, once the report has been received and an initial assessment of the subject of the report has been carried out, it notifies the reporting party that the report has been taken over, by recording the alert itself.

If the report is made by regular mail or e-mail address, it will be directly taken care of by the Steering Committee for Gender Equality (CGPG).

b) Preliminary assessment and transmission to the Internal Contact Person (RMM)

If the report is made through the Parrot SiQuAm portal, it will be activated for a preliminary assessment:

- If the report is manifestly unfounded, irrelevant or not relevant to gender equality (but to other areas of whistleblowing), SiQuAm manages it according to different agreed procedures;

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- whether the report falls within the objective scope of UNI/PdR 125:2022 and company policy on gender equality (i.e., if it concerns potential violations of gender equality) and whether it contains sufficient elements to initiate an analysis, SiQuAm prepares a dossier containing the content of the report (original text or minutes), any attachments provided by the reporting person, a brief note on the preliminary assessment (optional, but useful) and **forwards it promptly** (maximum 3 working days from receipt) to the person responsible for the investigation identified in the **Internal Reference for gender equality Harassment and Mobbing (RMM)** as a member of the Steering Committee for Gender Equality with specific skills.

If the report is sent by regular mail or e-mail address, it will be taken directly into account by the Steering Committee.

c) Reporting and Investigation Process Management (RMM)

Reception and Protocol: The reports received through any channel will be recorded in a special private register managed by the RMM that takes charge.

Assessment and investigations: RMM carries out an initial assessment and due diligence on the validity of the report and the need for an investigation.

- If the report is found to be unfounded, RMM shall archive the report together with the results of the checks carried out without taking any action.
- If the report is substantiated, an internal confidential investigation will be conducted by RMM as a properly trained and impartial person on the Steering Committee with possible internal team support (e.g. Compliance, CGPG, HR, legal) or, if necessary and approved by management, specialised external consultants. The investigation may include document collection, interviews (ensuring confidentiality and rights of defence), and other necessary verifications.
- If the report involves an external (reported) party, collaboration with the legal department could be crucial to address the complexities of this situation.

The CGPG has a role in monitoring the process.

All activities are documented in a secure and confidential manner.

d) Evaluation of results and decision (RMM / CGPG / AD)

At the end of the investigation, RMM prepares a report with the findings submitted to the company decision-making bodies (CGPG/AD).

If the breach is confirmed, the organization will take appropriate corrective and/or disciplinary measures (in accordance with the applicable CCNL and internal policies), which may include: formal recalls, mandatory training, transfers, suspensions, up to dismissal in the most serious cases. Actions to prevent future violations may also be implemented (e.g. policy review, awareness campaigns and training).

In cases of discrimination or harassment on the basis of gender, perpetrated by persons external to the organisation (such as customers, suppliers, consultants, visitors, etc.), the organisation in full compliance with its duty to intervene to prevent and protect health, the safety and dignity of its personnel and in accordance with what is defined by the legal provisions will proceed to evaluate according to the gravity of the fact the measures to be taken against the third party (e.g. strengthening awareness activities,

strengthening internal policies, training, formal communications, modification of interaction modalities, warnings, interruptions in relations ...) with possible request for support from a legal advisor.

If the facts constitute a criminal offence, it is essential to involve the legal advisor of the company from the earliest stages of the investigation in order to ensure compliance with all relevant laws and regulations, while respecting and protecting the reporting person. The legal advisor may advise on the appropriate scope of the investigation and the legal implications of any findings.

e) Confirmation to the Reporting Party:

If the report was made through the Parrot portal, the RMM communicates the general outcome of the investigation and the actions taken to Siquam, which provides a final response to the Informer, Respecting confidentiality obligations towards third parties and legal limits, within a reasonable time. The response will indicate whether the alert was followed up and, in general terms, what kind of measures were taken (e.g. "corrective action/disciplinary measures have been taken", "the alert has been closed for lack of substantiation", etc.).

If the report has been made by regular mail, email address or direct meeting with the Steering Committee (CGPG), the confirmation of the report will be given directly by the RMM.

f) Storage:

The documentation relating to the report and its management is stored in a secure and confidential manner for the time allowed by the regulations and internal policies.

For more information, please refer to the following documents:

- Parrot Software
- Privacy notice

2 2 Basic principles

- **Confidentiality:** all reports will be treated with the utmost confidentiality, in compliance with current regulations (including GDPR - Reg. EU 679/2016), limiting the dissemination of information only to those strictly necessary for the handling and investigation of the alert.
- **Anonymity:** there are channels that allow reports to be made in a completely anonymous form. The identity of the anonymous informer will not be actively sought, unless it is strictly necessary by law or in exceptional circumstances related to security.
- **Protection against retaliation:** the organization categorically prohibits any form of retaliation, penalization or discrimination against anyone who makes a report in good faith or collaborates with an investigation. Any retaliation will be subject to severe disciplinary sanctions.
- **Fairness and Impartiality:** The process of handling and investigating alerts will be conducted in a fair, objective and impartial manner, ensuring the right to defence for individuals being reported.