



Drill Pac is committed to preventing and promptly addressing any episodes that may undermine its values and its corporate vision. To this end, Drill Pac has implemented a *Whistleblowing* web portal to encourage and guide the reporting of any inappropriate or illegal conduct, as well as any behaviour that violates the company's Compliance Program. This ensures a fair, impartial, timely and confidential assessment of reports. These reports may come from: employees, collaborators, subordinate, self-employed workers, freelancers, consultants and other categories such as volunteers and trainees, including unpaid ones, shareholders and persons with administrative, management, control, supervisory or representative functions.

The company's Compliance Program consists of the Code of Ethics, the Anti-Corruption Guidelines, the Human Rights Guidelines, the Social Responsibility Management System pursuant to the SA8000 standard, Legislative Decree no. 24/2023 (implementing Directive (EU) 2019/1937 in regards to Whistleblowing) and other relevant Compliance Policies addressing local regulations that may apply to the Group's foreign entities.

### What to report

Reports must specifically address suspected violations of the Compliance Program, internal company procedures, or cases of unlawful conduct as defined by applicable legislation.

Behaviors, acts or omissions that harm the public interest or the integrity of the private entity may be reported. Please refer to Annex 1 of this Policy for details of the types of violations that may be reported pursuant to Legislative Decree no. 24/2023.

It is also possible to report the following:

- information on actions aimed at concealing violations mentioned above;
- Illegal activities not yet committed but that the whistleblower reasonably believes may occur in the presence of precise and concordant concrete elements;
- well-founded suspicions of violations already committed or potentially occurring..

Complaints of a commercial nature or reports regarding circumstances/facts already subject to ongoing judicial or administrative proceedings, monitored by Drill Pac's Legal Department, are excluded from the scope of this policy.

If the nature of the report falls outside this Policy, the recipient will indicate the appropriate policy or business procedure, if available.

### How to make a report

Reports must be submitted in written form and include a detailed description of the alleged violations. The company provides a web portal for this purpose at the following link:

[Ghella.com/whistleblowing](https://ghella.com/whistleblowing) (in the section dedicated to Drill Pac).

Alternatively, the company also provides the regular mail channel for sending written reports, which should be sent to the following address:



---

**Drill Pac S.r.l. – Società soggetta a direzione e coordinamento di Ghella S.p.A**

**Sede Legale:** Via Pietro Borsieri, 2/a - 00195 Roma (RM) - Cap. Soc. Euro 5.000.000,00 i.v.

Registro delle Imprese di Roma, C.F. e P.IVA IT06846990726 - Numero R.E.A. 1275584 -

Tel. +39 06 45603.1 – Fax +39 06 45603040 – e-mail: [info@drillpac.com](mailto:info@drillpac.com) PEC [drillpacsrll@pec.it](mailto:drillpacsrll@pec.it)

**Sede Operativa:** Via Grazia Cavanna, 46 - Loc. Borgonovo – 43018 Sissa Trecasali (PR)

Tel. +39 0521 379003



- Drill Pac S.r.l. – Sede Operativa Via Grazia Cavanna, 46 loc. Borgonovo - 43018 Sissa Trecasali (PR) (Italy).

Reports sent through regular mail must be addressed to the attention of the Supervisory Body of the parent company Ghella S.p.A., communications manager for Drill Pac.

As an alternative to the above, for alleged violations of the Compliance Program, reports can be sent to the Supervisory Body of the parent company Ghella S.p.A., communications manager for Drill Pac, also via the email address: [odvghella@ghella.com](mailto:odvghella@ghella.com)

### **Report management and analysis**

Reports will be received and managed by the **Communications Manager**, who will ensure *follow-up*. Each report will be carefully considered by the Communications Manager who will conduct a thorough analysis, while respecting the confidentiality nature of the report. He will gather information from the relevant departments and/or other parties involved.

If the report lacks of sufficient information, the Communications Manager may request additional details from the whistleblower. To ensure documentation, transparency and facilitate a formal assessment of the report, written communication is preferred throughout the entire process.

The analysis and investigation phases will be carried out and finalized within ninety days of the date of the notice of receipt, unless the specific nature of the event reported requires more time. The Communications Manager will keep the whistleblower informed of the progress of the investigation. In particular, he will notify the whistleblower when the report has been taken in charge and when the investigation has been concluded.

Where possible, Drill Pac will provide feedback to the whistleblower on the outcome of the investigation. However, it should be noted that provide detailed information about the actions undertaken by Drill Pac may not always be possible, as this could violate legal obligations, including the right to privacy and data protection of the individuals involved or disclose confidential business information or prior confidentiality agreements made by Drill Pac.

All reports must be recorded, and all supporting documents, including those produced or collected during the analysis phase, must be properly archived.

All parties designated to receive reports, as outlined in this policy, are required to process sensitive information, such as personal data, in line with the General Data Protection Regulation (GDPR) and with applicable data protection laws.

### **Reporter Protection and Disciplinary Measures**

The reports and the information contained therein, as well as the identity of the whistleblower (if known), will be treated confidentially. The identity of the whistleblower shall not be revealed without the prior written consent of the Data Subject, except when disclosure is legally required.

Reports may be submitted anonymously, without disclosing any personal data. However, it is important to note that this choice might complicate the resolution of the reported issue, especially if additional information from the whistleblower is required to ensure a successful investigation.

Drill Pac is committed to fully protecting whistleblowers from any repercussions or forms of discrimination related to or resulting from filing a report. Any whistleblower who internally reports



an incident in good faith will not face prosecution or adverse actions if the information provided cannot be proven or becomes irrelevant or insufficient for resolution of the report. If additional relevant information arises following the report, the whistleblower is encouraged to share it with Drill Pac's Communications Manager immediately, regardless of whether it supports or invalidates the original report.

Drill Pac is committed to protecting the colleagues and family members of the whistleblower, as well as the facilitators - those who assist the whistleblower in the reporting process, from any form of repercussions, discrimination, or retaliation. This protection extends to individuals operating within the same work context, and their assistance must maintain confidentiality.

By way of example, the following are considered acts of retaliation:

- a) Dismissal, suspension or equivalent provisions.
- b) Demotion in rank or non promotion.
- c) The change of duties, workplace reassignment, salary reduction, or modification of working hours.
- d) Suspension of training or any restriction of access to training opportunities.
- e) Negative performance evaluations or references.
- f) Adopting disciplinary measures or other sanctions, including financial penalties.
- g) Coercion, intimidation, harassment, or ostracism.
- h) Discrimination or other unfavourable treatment.
- i) Failure to convert a fixed-term employment contract into a permanent one, where the worker had a legitimate expectation of such conversion.
- j) Failure to renew or early termination of a fixed-term employment contract.
- k) Damage, including harm to the individual's reputation, on social media, or economic and financial prejudice, including loss of economic opportunities and income.
- l) Placement on improper lists - based on a formal or informal sectoral or industrial agreements - that hinder future employment within the sector or industry.
- m) Early termination or cancellation of a contract for the supply of goods or services.
- n) Revocation of a license or permit.
- o) Request for psychiatric or medical assessments.

Drill Pac will also adopt appropriate disciplinary provisions in case of reports made in bad faith, violations of the internal procedural system or applicable laws and/or instances of threats or retaliation against individuals who submit reports.

Disciplinary measures will be proportionate to the extent and severity of the misconduct and may also include termination of employment.

**This policy is communicated to all our employees as an essential part of the Onboarding process and is made available to all interested parties on the company's intranet and website. This policy is reviewed annually during the Management System Review.**

November 2024



Giovanni Garrone  
Sole Director



---

## Annex 1

### List of reports pursuant to Legislative Decree 24/2023

Pursuant to Legislative Decree 24/2023, Reports can concern **conduct, acts or omissions harm the public interest or the integrity of the Public Administration or the Private Entity** and consisting in:

- **Administrative, accounting, civil or criminal** offences;
- Unlawful conduct pursuant to Legislative Decree 8th June 2001 no. 231 on **Predicate Offences or violations of the Organisational and Management Models** provided for therein;
- **Offences falling within the scope of the European Union or national acts** identified in the annex of Legislative Decree 24/2023 **or national acts that constitute implementation of acts of the European Union** (explained in the annex to Directive 2019/1937), although not indicated in the Annex to Legislative Decree 24/2023, relating to the following areas:
  - *Public contracts.*
  - *Financial services, products and markets and the prevention of money laundering and terrorist financing.*
  - *Product safety and conformity.*
  - *Transport safety.*
  - *Environmental protection.*
  - *Radiation protection and nuclear safety.*
  - *Food and feed safety and animal health and welfare.*
  - *Public health.*
  - *Consumer protection.*
  - *Protection of privacy and protection of personal data and security of networks and IT systems.*
- **Acts or omissions affecting the financial interests of the Union** (as referred to in Article 325 TFEU) specified in the relevant secondary legislation of the European Union.
- **Acts or omissions concerning the internal market** (pursuant to Article 26 para. 2 TFEU), including violations of EU *competition* and *state aid rules*, as well as violations of the internal market related to acts that violate *corporate tax regulations* or mechanisms whose purpose is to obtain a tax advantage that defeats the object or purpose of the applicable corporate taxation law.
- **Acts or conduct that undermine the object or purpose of the provisions** of Union acts.