



# Joivy

WHISTLEBLOWING POLICY  
Management of reports of illegal or irregular conduct





## 1. Introduction

DoveVivo S.p.A. and the companies controlled by it (hereinafter also referred to as the "Group," and each company belonging to the Group as the "Company") conduct their business with honesty and integrity and expect all personnel to maintain high standards. This Group Whistleblowing Policy (hereinafter the "Policy") establishes the procedure for making Reports regarding Violations, as well as guidelines for handling Reports and standards for the protection of Reporters (each, as defined below). The Policy also ensures principles of confidentiality, anonymity protection, and non-retaliation, in accordance with applicable local, regional, national, and international regulations. The provisions of this Policy do not prejudice or limit in any way the right or obligation (as defined by applicable local regulations) to report to the regulatory, supervisory, or judicial authorities in the countries where the Group's companies operate.

## 2. Definitions

For the purposes of this Policy, the following definitions apply:

- **Ethical Code:** a set of values, principles, and commitments that inspire the Group and from which its conduct models derive. In particular, (i) compliance with laws; (ii) honesty, fairness, professionalism; (iii) impartiality; (iv) integrity and respect for individuals; (v) transparency and completeness of information;
- **Legislative Decree 231/2001:** Legislative Decree of June 8, 2001, no. 231, regarding the "Discipline of the administrative liability of legal entities, companies, and associations, even without legal personality, in accordance with Article 11 of Law no. 300 of September 29, 2000";
- **Recipients:** as defined in section 3.
- **Manager:** the Legal Office of the parent company DoveVivo S.p.A.
- **Model:** the organizational, management, and control model possibly adopted by Group Companies, pursuant to Legislative Decree 231/2001;
- **Policy:** this policy;
- **Feedback:** communication to the Reporter of information concerning the follow-up that is being given or intended to be given to the Report;
- **Retaliation:** any behavior, act, or omission, even just attempted or threatened, carried out due to a Report, a report to the Judicial or Accounting Authority, or public disclosure, causing or potentially causing unjust harm to the Reporter or the person who made the report, directly or indirectly;

The Group is composed of the following subsidiary companies controlled by DoveVivo S.p.A: (i) DoveVivo Campus S.r.l.; (ii) DoveVivo Agency S.r.l.; (iii) Uniaffitti S.r.l.; (iv) Rinnow S.r.l.; (v) The Best Place S.r.l.; (vi) Altido Italy S.r.l.; (vii) Someby SAS; (viii) Altido Ltd; (ix) Altido London Ltd; (x) Altido Scotland Ltd; (xi) Altido Portugal Lda; (xii) DoveVivo Espana SL; (xiii) LRC Bulgaria; (xix) Roommate SA.





services on behalf of the Company;

- Volunteers and interns, whether paid or unpaid;
- Shareholders and individuals with administrative, managerial, supervisory, or representative functions, even if such functions are exercised as a matter of fact, within the Group Companies.

The Policy applies to Recipients:

- even if the legal relationship has not yet begun, and information regarding the Violation has been acquired during the selection process or in pre-contractual stages;
- during the probationary period;
- subsequent to the termination of the legal relationship, provided that information about Violations was acquired during the course of the relationship itself.

#### 4. Object of the Report

Reports can only concern Violations as defined in section 2.

As examples, and not exhaustively, the following Violations may be subject to Reports:

- Corruption and fraud
- Embezzlement and theft
- Money laundering
- Violations of health, safety, and environmental regulations
- Discrimination, harassment, bullying, and other labor law matters
- Violations of personal data protection (Privacy) and IT security regulations
- Violations of tax laws
- Violations of competition law (Antitrust)

However, Reports cannot concern disputes, claims, or requests related to the Reporter's personal interests that solely pertain to their individual employment relationships.

In any case, Reports must:

- be made in good faith;
- be detailed and based on precise and corroborating factual elements;



- be based on verifiable facts known directly to the Reporter;
- contain, if known, all necessary information to identify the potentially illicit conduct's authors.

Where Reports are clearly unfounded, opportunistic, and/or made solely to harm the Reported or parties otherwise affected by the Report, such Reports will not be considered, and the Reporters may be subject to sanctions and/or actions before the competent Judicial Authority.

## 5. Internal Reporting Channel

Reports can be made electronically by accessing the digital platform accessible at the following link <https://whistleblowersoftware.com/secure/GruppoJoivy>, ensuring confidentiality, in various languages, both in written and oral form through voice messaging systems.

## 6. Report Manager

The Report Manager receives adequate instructions, is independent, possesses the necessary skills to perform their duties, and handles Reports with due diligence. They may perform other tasks and duties as long as this does not result in a conflict of interest.

The Manager carries out the following activities:

- a) when a Report is submitted, they issue a receipt notice to the Reporter within 7 (seven) days from the date of receipt;
- b) examine the Report to determine its validity;
- c) conduct a timely and thorough investigation, respecting the principles of impartiality, fairness, proportionality, and confidentiality towards the Reporter, the Involved Person, and all parties involved in the Report. During these investigations, the Report Manager may seek support from the relevant company functions and/or specialized external consultants, ensuring the confidentiality of information and anonymizing personal data whenever possible;
- d) maintain communication with the Reporter and may request further information if necessary;
- e) evaluate whether and when the information contained in the Report should be notified to



- the competent Judicial Authorities, also in accordance with locally applicable regulations;
- f) provide feedback on the Report within 3 (three) months from the date of the receipt notice or, in the absence of such notice, within 3 (three) months from the expiration of the seven-day period from the submission of the Report, unless justified reasons exist. If the investigation is not completed within the aforementioned deadline, the Reporter is still updated on the status of the investigation, where technically feasible;
- g) proceed with the archiving of Reports that prove unfounded;

For the parent company DoveVivo S.p.A., which has adopted the Model, the Manager who has received a Report relevant to Legislative Decree 231/2001 shall immediately notify the Supervisory Body of the Company. The Supervisory Body, respecting the confidentiality of the Reporter, will carry out the verification and management of the Report, make the necessary decisions, and take measures in response to the Report, in accordance with the Model and this procedure that is part of it.

If the Report involves the Report Manager, the Reporter can address it through the same channel to the Human Resources Office, which will directly manage the Report in accordance with this procedure.

Employees of Group Companies who receive a Report outside the internal channel mentioned in Article 5 are required to transmit it through that channel within 7 days, informing the Reporter, and refraining from disclosing any information that would allow the identification of the Reporter or the person involved.

## 7. Other Reporting Channels

Although encouraged to make any Report internally in accordance with this procedure, the Reporter has the right, subject to local laws:

to submit a Report to the competent national authority. A non-exhaustive list of competent external bodies is available in the annex (Annex "A").

to disclose a Report through the press or other media;

to file a complaint with the judicial authority.

In these cases, the protection of the Reporter as defined in paragraph 9 is maintained, in compliance with locally applicable regulations.

## 8. Confidentiality

To encourage Recipients to promptly report any Violation, the Group ensures the confidentiality of each Report. The identity of the Reporter and any other information from which their identity can be directly or indirectly inferred may not be disclosed without the express consent of the Reporter to persons other than those competent to



receive or follow up on Reports.

In the context of any disciplinary proceedings resulting from the Report, the identity of the Reporter may not be disclosed if the disciplinary charge is based on distinct and additional findings, even if related to the Report. If the charge is based, in whole or in part, on the Report, and the knowledge of the Reporter's identity is essential for the defense of the accused, the Report may be used for disciplinary proceedings only with the express consent of the Reporter to the disclosure of their identity. The Reporter is notified in writing of the reasons for the disclosure of confidential data for this purpose.

The internal channel used for submitting the Report and its management:

- is protected by security measures to contain the risk of unauthorized access, modification, or loss of data;
- records all operations performed;
- adopts data minimization and anonymization systems (e.g., voice distortion of any voice messages).

## 9. Non-Retaliation

The Group is committed to adequately protecting the Reporter against any form of Retaliation, discrimination, or penalty related, directly or indirectly, to the Report.

Protection against acts of Retaliation also applies to:

- a) the facilitator, i.e., the natural person who assists a Reporter in the Reporting process, operating within the same work context;
- b) individuals within the fourth-degree of stable emotional or family relationship with the Reporter who work within the same work context as the Reporter;
- c) co-workers of the Reporter who work within the same work context as the Reporter and have a regular and ongoing relationship with the Reporter;
- d) entities owned by the Reporter or for which the Reporter works, as well as entities operating within the same work context as the Reporter.

The Group takes action to eliminate (where possible) or mitigate the effects of any potential Retaliation against the aforementioned individuals. The Group reserves the right to take appropriate actions against anyone who engages in, or threatens to engage in, Retaliation against the individuals listed above, subject to the right of the parties involved to pursue legal protection if criminal or civil liability related to the falsity of statements or reports is found.





The Reporter may report to the competent National Authority any Retaliation they believe they have suffered or may take legal, administrative, or extrajudicial action.

## **10. Privacy Notice**

### **10.1 Data Controller**

The data controller for the processing related to the management of Reports is DoveVivo S.p.A., Viale Monte Nero 6 - 20135 Milan (MI), Tel. 02 36697390, email: [privacy@dovevivo.com](mailto:privacy@dovevivo.com).

### **10.2 Purpose and Legal Basis of Processing**

The personal data contained in the Report and those potentially collected as part of the related process are processed solely for the purpose of managing the Report and providing a response as required by law.

Operations carried out on the internal channel where Reports are made and managed are recorded.

The legal basis for processing is found in Article 6(1)(c) of Regulation 2016/679/EU.

### **10.3 Data Recipients**

The data is processed by the Legal Office of the parent company DoveVivo S.p.A. or, if the latter is involved in the Report, by the Human Resources Office of DoveVivo S.p.A.

For Reports related to Dovevivo S.p.A., relevant under Legislative Decree 231/2001, the data is also processed by the Supervisory Body (OdV).

Recipients of Reports are authorized for processing with specific instructions.

The platform for collecting Reports is managed by Whistleblower Software Aps, which is appointed as the data processor.

Due to confidentiality obligations to protect the Reporter, personal data may be transmitted to the competent judicial authority.

### **10.4 Data Retention Period**

Data related to a Report and its related documentation are retained for 5 years from the communication of the outcome of the Report procedure.

### **10.5 Data Subject Rights**

The rights typically recognized for the data subject (access to data, rectification, erasure, restriction of processing, portability, etc.) can be exercised within the limits of Article 2 undecies of Legislative Decree 196/03.

The data subject has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

