

**INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA
RELATED TO THE WHISTLEBLOWING PROCEDURE PURSUANT TO
ARTICLES 13 AND 14 OF THE GENERAL REGULATION (EU) 2016/679
("GDPR")**

Metinvest Trametal S.p.A., with registered office at Via XII Ottobre, 3 – 16121 Genova (GE), F.C. 05956630965 and **Ferriera Valsider S.p.A.**, with registered office at Via A. Salieri 36, I – 37050 Vallese di Oppeano (VR), F.C. 03067420236 (jointly the "**Companies**" or individually the "**Data Controller**") provide this information notice regarding the processing of personal data provided and/or collected by the Data Controller, in order to enable the receipt and management of whistleblowing reports.

As better illustrated in the Whistleblowing Policy adopted by the Companies on 15 July 2023, the term "**Report**" means any communication to the Companies, written or oral, concerning a possible breach (as defined in the Legislative Decree 24/2023, the "**Decree**", transposing Directive (EU) 2019/1937 regarding the protection of persons who report violations of Union and national law), including a breach of:

- a. Code of Ethics, Organisation and Management Model pursuant to Legislative Decree 231/2001 ("**231 Model**") or internal regulations, procedures or policies referred to therein (including the Whistleblowing Policy);
- b. offences in the following fields: public procurement; financial services, products and markets and the prevention of money laundering and the financing of terrorism; product safety and compliance; environmental protection; radiation protection and nuclear safety; consumer protection; public health; the protection of privacy and the protection of personal data and the security of networks and information systems; European internal market regulations, in particular with reference to competition rules, state aid, corporate taxes, as well as the protection of the financial interests of the State and/or the European Union;
- c. administrative, accounting, civil and criminal offences not already covered by the above.

(each of the aforementioned violations, a "**Breach**").

For further information regarding the receipt and the management procedure of whistleblowing reports, please refer to the Whistleblowing Policy, available on the Companies' website at the following link: <https://trametal.metinvestholding.com/it> <https://valsider.metinvestholding.com/it..>

I. CATEGORIES OF PERSONAL DATA AND DATA SUBJECTS

In the context of acquisition and the subsequent management of the Report, the Data Controller may process personal data belonging to the following categories (hereinafter the "**Personal Data**"):

- a. contact and identification data (*e.g.*, name and surname);
- b. data relating to the office and/or role and/or work or professional duties performed by the data subjects;
- c. Report and any other information provided when submitting the Report and/or for the management of thereof and of the relevant procedure, as well as the related documentation.

In addition to the above, where necessary the Data Controller may also process Personal Data belonging to "special categories" as referred to in Article 9 of the GDPR, (*e.g.*, political opinions) and/or judicial data, as referred to in Article 10 of the GDPR, ensuring that the processing activities of such categories of personal data is carried out in compliance with the provisions set forth by the GDPR and Legislative Decree 196/2003 (the "**Privacy Code**").

The Personal Data provided and/or collected by the Data Controller belong to the following categories of data subjects (hereinafter the “**Data Subjects**”):

- a. reporting person, meaning a natural person who makes the Report and/or makes a public disclosure by making information on breaches available in the public domain;
- b. person concerned, meaning a natural person who is referred to in the Report or in the public disclosure as a person to whom the breach is attributed or whom that person is associated with;
- c. any other person mentioned in the Report and whose personal data is processed in the context of the management procedure, under the applicable whistleblowing law, including, where applicable, natural persons who work and/or have worked for the Companies (e.g., persons with functions of administration, management and/or control at the Companies; employees in any capacity and former employees of the Companies, in the latter case if the information on alleged violations was acquired in the course of the employment relationship; candidates for employment positions at the Companies, for information on alleged violations acquired in the selection process or in other pre-contractual phases; trainees and probationary workers; shareholders; consultants and/or professionals; employees of contractors and service providers; attorneys or agents; etc.).

In addition to the above, the following categories of Data Subjects may also be recipients of the processing activities carried out by the Data Controller in the context of receipt and/or management of the Report:

- a. “facilitators”, *i.e.* natural person who assists a reporting person during the reporting process in a work-related context, and whose assistance should be confidential;
- b. third persons who are connected with the reporting person or to the person who filed a Report with the competent judicial, administrative or accounting authority (including independent agencies such as ANAC) (the “**Authority**”), by a stable affective or kinship link up to the fourth degree and work in the same work-related context; and
- c. colleagues of the reporting person and/or of the person who filed a Report with the Authority and/or made a public disclosure, who work in the same work-related context and who have a regular and current relationship with that person.

II. LEGAL BASES AND PURPOSES OF THE PERSONAL DATA PROCESSING

With reference to the categories of Data Subjects, the Data Controller shall process Personal Data for the following purposes:

- a. *Fulfilment of regulatory obligations and pursuit of the relevant public interest related to whistleblowing reports*

The Data Controller shall process the Personal Data in order to effectively prevent and counter any violation and to support the effective application and operation of the 231 Model and compliance with the Decree, as well as to manage, organise and handle the Report, also in connection with internal investigations and enquiries related to the verification of the conduct subject to whistleblowing and to the initiation of proceedings, including disciplinary proceedings, to the extent required by the applicable whistleblowing laws. Moreover, the Personal Data may be processed in order to comply with requests by the competent Authority and, more generally, by public subjects in compliance with the formalities provided for by the applicable laws.

For the purposes described above, common personal data may be processed for the fulfilment of legal obligations which the Data Controller is subject to, under Article 6, paragraph 1, let. c) of the GDPR.

Data belonging to “special categories” under Article 9 of the GDPR may be processed (i) for reasons of substantial public interest, (ii) for the purpose of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection pursuant to and within the limits of Article 9, paragraph 2 let. (b) and (g) of the GDPR and within the limits of the Privacy Code. Furthermore, such category of personal data may be processed also for the establishment, exercise or defence of the Data Controller and /or third party’s legal claim pursuant to Article 9, paragraph 2, let. (f) of the GDPR (*i.e.* to combat the offences identified by the whistleblowing laws and to protect the Reporting person and others assimilated to them from retaliation).

Within the limits of the substantial public interest, as described and circumscribed by the applicable privacy laws, judicial data may also be processed pursuant to Article 10 GDPR.

b. Pursuit of a legitimate interest of the Data Controller or a third party

The Data Controller shall process Personal Data for (i) the Data Controller’s internal control and business risk monitoring needs, as well as for the optimisation and streamlining of internal business and administrative management processes; and (ii) to ascertain, exercise or defend a right or legitimate interest of the Data Controller or of a third party in any competent forum.

The legal basis for the processing is represented by the pursuit of the legitimate interest of the Data Controller or a third party, represented by the right of defence and the interest in ensuring the effectiveness and efficiency of the 231 Model and of the Companies’ internal control and risk management system also in order to effectively prevent and counter fraudulent and unlawful or irregular conduct, pursuant to Article 6, paragraph 1, let. f) of the GDPR. This legitimate interest has been duly assessed by the Data Controller.

III. MODALITIES OF THE PROCESSING ACTIVITIES

The Personal Data, provided and/or collected in the context of the whistleblowing procedure, will also be processed by electronic means and used strictly and exclusively for the purposes indicated. Where appropriate, the processing will be carried out in aggregate/anonymous form.

In any case, the Companies guarantee, by means of the use of encryption tools, the confidentiality of the identity of the reporting person, the person concerned and any other person mentioned in the internal report, as well as the content of the internal report and of the related documentation, both in transit and on file.

IV. CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

For the pursuit of the purposes indicated in paragraph II above, the Personal Data and any other information contained in the Report will be collected and processed by (i) the members of the Reporting Body, as the function responsible for the receipt of the internal reports, or (ii) the Compliance Officer of the Group to which the Companies belong, in the event that the breach concerns one or more of the Reporting Body’s members, in accordance with the Whistleblowing Policy.

As the management of the Report is coordinated amongst the Companies, each of them may support the other and therefore a communication of personal data amongst them may take place.

The Data Controller informs that Personal Data will be also processed by the auxiliary personnel in charge of the Companies’ functions involved in the whistleblowing procedure, duly authorized to process personal data pursuant to Article 29 of the GDPR and Article 2-*quaterdecies* of the Privacy Code and instructed by the Data Controller to process personal data in application of the Whistleblowing Policy.

Further, the Personal Data may also be processed by the following categories of recipients:

- a. third parties who support the Companies in the context of the whistleblowing procedure (*e.g.*, auditing companies, private investigators, lawyers, consultants, forensic experts). Such category of recipients will process the Personal Data as “data processors” on the basis of a specific data processing agreement (“**DPA**”) entered into with the Companies, pursuant to Article 28 of the GDPR, and/or as autonomous data controllers, in accordance with the applicable privacy laws;
- b. competent authorities (*e.g.*, ANAC) who will process the Personal Data as autonomous data controller, under the applicable privacy laws.

V. COMMUNICATION AND TRANSFER OF PERSONAL DATA

The Personal Data processed in the context of the whistleblowing procedure are not subject to disclosure to any third party if not duly authorized to the processing activities by the Data Controller, as set in the paragraph IV of this information notice.

However, the Data Controller informs that the Personal Data may be subject to transfer toward third countries which are located outside the European Economic Area (“**EEA**”). In particular, the Personal Data may be processed by companies of the Metinvest Group in Ukraine; such processing is however occasional and will take place only when it is necessary to have a coordinated group approach to the management of the Reports. For such cases, the Data Controller ensures that the transfer of the Personal Data is carried out in accordance with the provisions set forth by Articles 45 and 46 of the GDPR.

VI. PERSONAL DATA RETENTION PERIOD

The Data Controller ensures that the Personal Data, provided and/or collected in the context of the whistleblowing procedure will be processed for a period of time no longer than is necessary to achieve the purposes which they are collected for, which, in any case, shall not exceed **5 years** from the date of communication of the final outcome of the reporting process, in compliance with the principles of confidentiality and minimization referred to in Article 5 of the GDPR.

However, the Data Controller may retain the processed Personal Data for a longer period (i) in execution of applicable legal obligations and provisions, (ii) for administrative purposes and/or (iii) to assert and/or defend the rights and/or legitimate interests of the Companies or third parties, including in case of complaints, litigation or pre-litigation.

VII. DATA SUBJECTS’ RIGHTS

In the context of the processing activities of the Personal Data, the Data Subjects may exercise the rights provided for in Articles 15 to 22 of the GDPR. In particular, the Data Subjects may: (a) ask the Data Controller for confirmation of the existence of their personal data, the origin of such data, the logic and purposes of the processing, the categories of subjects whom the data may be communicated to, as well as the identification details of the data controller and data processors; (b) request access to their personal data, their transformation into anonymous form, their blocking, rectification, integration or cancellation, or the restriction of their processing (c) object to processing in the cases provided for; (d) exercise the right to portability; (e) revoke consent (where this is the necessary legal basis for processing) at any time without prejudice to the lawfulness of processing based on the consent given before revocation; (f) lodge a complaint with the competent data protection Authority (including the Italian data protection Authority, *Garante per la protezione dei dati personali*) following the procedures and instructions published on the Authority’s official website at www.garanteprivacy.it.

Any rectification or cancellation or limitation of processing carried out at the request of the Data Subjects – unless this proves impossible or involves a disproportionate effort – will be communicated by the Data Controller to each of the recipients whom the Personal Data have been transmitted to. The Data Controller

may communicate such recipients if the Data Subjects so request.

In accordance to the provisions set forth by Article 2-*undecies* of the Privacy Code, the Data Controller hereby informs the Data Subjects that their rights provided for in Articles 15 to 22 of the GDPR and, in particular, the right of access, may not be exercised by request to the Data Controller, or by complaint pursuant to Article 77, where the exercise of such rights may result in actual and concrete prejudice to the protection of the confidentiality of the reporting person and persons considered equivalent to the latter, and/or to the progress of investigations, as defined in the Whistleblowing Policy, and/or to the exercise of the Companies and/or a third party's right in court.

Pursuant to paragraph 3 of Article 2-*undecies* of the Privacy Code, the exercise of such rights may also be delayed, limited or excluded for as long as this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Data Subjects, in order to safeguard the defensive interests of the Data Controller and the confidentiality of the Data Subjects.

In such cases:

- a. the Data Subjects shall be informed by the Data Controller by reasoned notice given without delay, unless such notice would jeopardise the purpose of the limitation of the exercise of rights; and
- b. the Data Subjects may exercise their rights before the Italian data protection Authority (*Garante per la protezione dei dati personali*), according to the modalities set forth by Article 160 of the Privacy Code. In this case, the Italian data protection Authority shall inform the Data Subjects that it has carried out all the necessary verifications or has conducted a review.

The right of data subjects to lodge a judicial appeal remains unaffected.

In order to exercise their rights, the Data Subjects may contact the Companies by writing at the following email addresses: GDPR@metinvest-westerneurope.com.