

SAATI

Information on the processing of personal data

WHISTLEBLOWING – CODE OF CONDUCT

GROUP

SAATI S.p.A. and the other Group companies as listed from time to time in **Annex 1** hereto (collectively “SAATI”), in their capacity as joint-controllers, would like to inform you about the processing activities of your personal data (“Data”) which may be undertaken in the context of

- managing reports submitted in relation to the Code of Conduct adopted by SAATI through the reporting channels identified therein (including potential breaches thereof);
- managing reports submitted in relation to the local Whistleblowing Policies through the reporting channels identified therein, where such Whistleblowing Policies have been adopted in accordance with the provisions of the applicable legislation (“Whistleblowing Legislation”);

in accordance with the legislation on data processing activities (“Privacy Legislation”).

This Information does not apply in the case of reports made through external channels or in the case of public disclosures as contemplated in the applicable local Whistleblowing Policies.

1. Data Controller

The joint data controllers are identified in **Annex 1** hereto.

2. Purposes of the processing and consequences in case of refusal to provide your personal data

SAATI has adopted

- a Code of Conduct, contemplating several reporting channels for any doubts, requests of support, notices of violation or suspected violation thereof; and
- in compliance with the Whistleblowing Regulations, local Whistleblowing Policies contemplating several reporting channels in order to allow the addresses of said policies to report serious irregularities as provided for in the Whistleblowing Regulations, in line with what is set out in the Whistleblowing Policies available on SAATI's website.

As part of the reporting management activities, SAATI processes Data for the sole purpose of enabling the verification of the report received and the adoption of appropriate measures in the event that as a result of the report a relevant violation is established.

The Data and information provided during the activities related to the report may concern

- (i) the name and contact details of the reporting person, unless the report is made anonymously if applicable pursuant to the applicable legislation;
- (ii) the identity, functions, and contact details of the persons involved in processing the reported events (see the complete list in Annex 1);
- (iii) the names and positions of those involved with the alleged perpetrator of the breach (Reported Person) or information enabling their identification (e.g., Facilitators);

- (iv) the names and positions of any other persons who can confirm to the related events included in the report;
- (v) a description of the alleged violation and the circumstances of the case, including any reference to any documents or other items that may substantiate the reported events.

Only where relevant to the reported matter and only to the extent permitted by applicable law and/or the need to ascertain, exercise, or defend a legal claim Data belonging to special categories may be processed (e.g., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing of genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation). If such Data are not relevant for reporting purposes or are otherwise irrelevant, they will be deleted promptly and will not be processed further.

The provision of Data is optional; however, in case of refusal or anonymous reporting, it will be more difficult or as the case maybe, it may not be possible to follow up on the activities related to the report.

3. Legal basis for processing Data

SAATI processes the Data, in full compliance with the provisions of current data protection regulations and in any case in line with local regulations, on the following various legal grounds:

- On the basis of compliance with **legal obligations** to comply with relevant applicable laws and regulatory requirements and to respond to lawful requests, judicial orders and legal proceedings.
- On the basis of **legitimate interests** to achieve a legitimate interest based on an assessment of the interests of SAATI, the data subject, and other fundamental interests. Such legitimate interests may include investigating and taking appropriate action in connection with a potential breach of applicable laws that has been or will be committed.
- On the basis of **consent** if applicable pursuant to the local legislation, the identity of the reporting person and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those responsible for receiving or following up the reports, who are expressly authorized to process such personal data. Express consent is also required while using the voice messaging channel.
- On the basis of performing **a task carried out in the public interest** or in the exercise of official authority vested in the data controller.

Any Data belonging to specific categories, if acquired in the context of the Report and of the relevant investigation, may be processed only if necessary:

- To fulfil the obligations of SAATI and exercise the rights of the data subject pursuant to the labor law;
- To establish, exercise or defend a right in court or whenever the judicial authorities exercise their jurisdictional function;
- for reasons of overriding public interest based on the applicable local legislation.

The processing of Data relating to criminal offences on the breaches reported may only take place if necessary for the fulfilment of obligations under the applicable Whistleblowing Legislation.

4. Disclosure of your Personal Data to third parties

The Data is processed by employees, consultants, contractors and other authorized processing personnel, as well as third parties who may act as data processors or other data controllers.

Information collected through your reporting may be disclosed to external consultants, government authorities when necessary for the purpose of complying with legal requirements or in the course of legal action.

Reports are handled by employees, consultants, collaborators and other staff authorized to process them, as well as by third parties such as consultancy companies or external consultants for the performance of activities instrumental to the above purposes. These subjects will act, when acting on behalf of SAATI, normally as data processors. The information collected through such Reports may be disclosed to external consultants or government authorities, when necessary to comply with legal requirements or in the course of legal proceedings.

5. Transfers of Personal Data outside the European Union.

SAATI may only transfer personal data to countries and international organizations that the European Commission has deemed suitable on the basis of an adequacy decision, or if the third country or organization provides adequate guarantees to ensure the same level of protection. Adequate guarantees may be provided by signing standard contractual clauses.

6. How Personal Data are processed

All reporting channels are designed and operated in a secure manner to prevent access to information by unauthorized persons and to ensure that the identity of the reporting person and other persons involved in the investigation remains confidential.

SAATI will ensure that the collection, processing and use of personal data will be carried out by specially instructed and trained staff in compliance with technical and organizational security measures to protect the integrity and confidentiality of the identity and personal data of the reporting person and of the other persons involved in the report.

The identity of the persons involved and those mentioned in the report is guaranteed, unless its disclosure is required by law, until the conclusion of the relevant proceedings.

7. Retention of Personal Data

The Data are retained by SAATI for the time strictly necessary to pursue the purposes for which the Data are collected and to comply with applicable legal obligations, in any event within the maximum retention period provided for by applicable laws.

In addition, the Data will be deleted or permanently anonymized upon achievement of the above purposes, unless SAATI is required to retain the data for a further period to fulfill legal obligations.

8. Your Rights

You may exercise at any time the rights provided by the applicable local legislation (such as obtaining confirmation of the existence or non-existence of Data, verifying its content, origin, accuracy, requesting its integration, updating, rectification, deletion, anonymization, requesting data portability, restriction of processing, opposition to processing for legitimate reasons), by writing to the addressees referred to in **ANNEX 1**.

The exercise of your rights may, in any case, be delayed, limited or excluded by reasoned notice from SAATI (unless such notice would jeopardize the purpose of the limitation), to the extent permitted by applicable laws and for as long and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject.

At any time you may submit a complaint to the competent authority.

Latest revision: March 2024

ANNEX 1

| Country | Data Controller [company and contact details, address, exercise of privacy rights] |
|---------------------------------|---|
| Italy | SAATI S.p.A. Via Milano 14, Appiano Gentile, 22070 Como, Italy privacy@saati.com |
| United States of America | SAATI Americas CO 201 Fairview Street Ext.- Fountain Inn, South Carolina 29644, USA privacy@saati.com |
| | SAATI Advanced Chemicals LLC (Ikonics) 4832 Grand Avenue, Duluth, Minnesota, USA privacy@saati.com |
| China | Shenzhen Sales Office Rm 714-717, Floor 7, Dreamland Times Square, Hepin Road, Longhua Street, Boan Area, 518057 Shenzhen City, Guangdong Province privacy@saati.com |
| | SAATI Technical Fabric (Tianjin) Co. Ltd. Cross of Saida 2nd Branch Road and Saida Century, Avenue, Xiqing Economic Development Area, Tianjin, China, 300385 privacy@saati.com |
| | Shanghai Sales Office Room 47bis, 4th Floor, Lombardy Building-No 999, Ningqiao Road, Pudong, Jinqiao Shanghai, China, 201206 privacy@saati.com |
| | WuXi TianYi Precision Fabrics Co., Ltd. No. 28, Xigang West Road, Donghutang, Donggang Town, Xishan District, Wuxi City – China privacy@saati.com |
| South Korea | SAATI Korea Ltd. SK Ventium 101-601, 166, Gosan-ro, Gunpo-si, Gyeonggi-do, Republic of Korea privacy@saati.com |
| Russia | OOO SAATI Russia 23 Shvetsova str. 198095 Saint-Petersburg – Russia privacy@saati.com |