



Annex C- Procedure for the Management of Whistleblowing Reports

Guidelines for the use of the Whistleblowing platform

NEVER STOP SEEING THE UNSEEN.

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www.esaote.com

PURPOSE AND SCOPE

These Guidelines have been drafted in order to illustrate ways for the Company to become aware of violations of regulatory provisions that affect the public interest or the integrity of the organization in order to address any problem in a timely and remedial manner.

In order to enable whistleblowers to make a report, the Company has adopted a digital communication channel ("whistleblowing platform") through which it is possible to inform of the commission of violations, misconduct, behaviors, acts or omissions that harm the public interest or the integrity of the Esaote Group or the individual Legal Entities that comprise it.

THE WEBSITE TO ACCESS

These Guidelines illustrate the operational methods for the proper handling of reports that whistleblowers can make by making use of the digital platform made accessible by the Esaote Group, which can be consulted at the following link:

https://esaotewb_whistleblowing.keisdata.it/Home

It should be noted that this channel of communication, from the receipt of the report and at every subsequent step, guarantees the confidentiality of the identity of the reporter in the management activities of the report and, where chosen by the reporter, his or her anonymity.

In any case, it is expressly forbidden to carry out acts of retaliation or discrimination, whether direct or indirect, against the reporter and other protected persons, for reasons related, directly or indirectly, to the report.

STEPS TO FOLLOW

The steps to be followed for reporting into the platform can be summarized as:

- 1 Start
- 2 Reporting Channel
- 3 Scope of the report
- 4 Corporate Data
- 5 Event Description
- 6 Attachments
- 7 Documents
- 8 Send

START

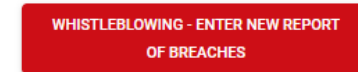
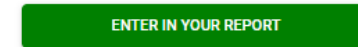
1 On the home page, through this drop-down menu you can select the language of the platform.



Welcome to the platform for the management of reports of offenses, follow the steps to enter a new report or view the reports already entered, in total confidentiality

To review your report information or get updates, enter the CODE and KEY here

Code Key



To enter a new report, it is necessary to press on «*Whistleblowing-Enter new report of breaches*»

In addition, if the user has already made a report and wants to monitor its progress, he or she can either by entering the alphanumeric code and key associated with the report that will be provided or after making the report, and press "*Enter in your report*"

START

1
bis

At this first step, the user accesses the platform in order to make a new report and must select the **Esaote Group Company** for which he or she is making the report.



1

Start

2

Reporting channel

3

Scope of the report

4

Corporate Data

5

Event Description

6

Attachments

7

Documents

8

Send

All reports will be dealt with by the competent bodies; the report you are about to submit must be based on the detection of potentially illegal conduct and based on precise and consistent factual elements, of which you have come to know due to the working context. In any case, the competent body is required to maintain the confidentiality of the identity of the reporting party vis-à-vis the Company, except in cases expressly established by law (eg. Specific request by the Judicial Authority). This reporting channel ensures the confidentiality of your identity in reporting management activities. You can still choose to keep your anonymity and therefore the provision of personal data is to be understood as optional. However, this circumstance could nevertheless prejudice the investigation: anonymous reports, in fact, will be taken into consideration only if they are presented adequately detailed and made in great detail, in order to bring out facts and situations related to specific contexts. Finally, we remind you that the Company, as also required by the relevant legislation, has expressly provided for the prohibition of retaliation or discriminatory acts, direct or indirect, against anyone who makes a report for reasons connected, directly or indirectly, to the report itself.

Select the company of the Group to which your report relates.

Esaote S.p.A.

[LINK TO THE INFORMATION RELEASED IN ACCORDANCE WITH ART. 13 OF REGULATION \(EU\) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF SUBJECTS REPORTING OFFENSES](#)

I declare that I have read the information on the processing of personal data

It is important for the user to read the **privacy policy**.

REPORTING CHANNEL

2

In this section the user views the Reporting Committee (Direct Channel) and the Alternate Channel who will view and handle the report.

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Modulo Whistleblowing powered by KEISDATA

Start Reporting channel Scope of the report Corporate Data Event Description Attachments Documents Send

Your report will be subjected to a pre-assessment of its validity by the dedicated function. If the report concerns one or more subjects of this function, as indicated below, you can proceed directly by selecting the Direct or Alternative Channel as indicated. If the report is found to be well founded, it will then be sent to the person in charge of the report chosen by you below from those proposed by the Company (Direct Channel or Alternative Channel) so that it can continue with the investigations and ascertainment of the case.
The procedure provides for a preliminary assessment of the report carried out by :

Partners4Innovation

Function/Role composed of :

Partners4Innovation

Direct channel and reporting manager :

Partners4Innovation,Reporting Committee - Italy

Function/Role composed of :

Partners4Innovation
Caprile Paolo (Italy HR)
Faggiano Ombretta (Corporate Legal, Governance Compliance & Tenders)

Alternative Channel, if the report involves the Direct Channel Reporting Manager

Partners4Innovation

Function/Role composed of :

Partners4Innovation

The report concerns the role : Group Pre-Assessment Whistleblowing ? Partners4Innovation

NO - CONTINUE WITH THE NORMAL PROCESS YES - SKIP THE PRE-ASSESSMENT

Pre-evaluation choice

The report concerns the Function of the Direct Channel function ? Partners4Innovation - Reporting Committee - Italy

NO - CONTINUE WITH THE DIRECT CHANNEL YES - CONTINUE WITH THE ALTERNATIVE CHANNEL

Channel Choice

In addition, the whistleblower should indicate whether he/she wants to proceed with the Direct Channel or the Alternative Channel if the report concerns direct subjects.

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SCOPE OF THE REPORT

3

In this section the user must select the category of subjects to which they belong, selecting from

- Employees also during the provisional period
- Collaborators
- Consultants
- Interns
- Former employees
- Trainees
- Candidates
- Volunteers
- Members of the administrative, management or supervisory body, including non-executive directors
- Shareholders
- Members
- Suppliers or employees of suppliers
- Contractors or employees of contractors
- Subcontractors or employees of subcontractors
- Other category

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Creativity in Healthcare

UK

Modulo Whistleblowing
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Start Reporting channel **3** Scope of the report Corporate Data Event Description Attachments Documents Send

Category of the reporting party
Employees also during the provisional period

Main subject of the report

Violations
Violations of internal provisions of the individual Company, such as: Code of Conduct

In addition, the whistleblower must select the subject of the report.

CORPORATE DATA

4

In this section, the user must select the Company Area involved in the report



Start



Reporting channel



Scope of the report



Corporate Data



Event Description



Attachments



Documents



Send

Company Area

Main subjects involved in the report

	ADD	Name	Surname	Role
1		<input type="text"/>	<input type="text"/>	<input type="text"/>

In addition, the whistleblower has the option of reporting the Principal Persons involved in the report, indicating First Name, Last Name, and Role.

EVENT DESCRIPTION

5

In this section the user can ask for a direct meeting with the reporting committee, enter a description of the event he or she witnessed and wants to report through the platform. The description can be textual or can proceed by making a voice recording.

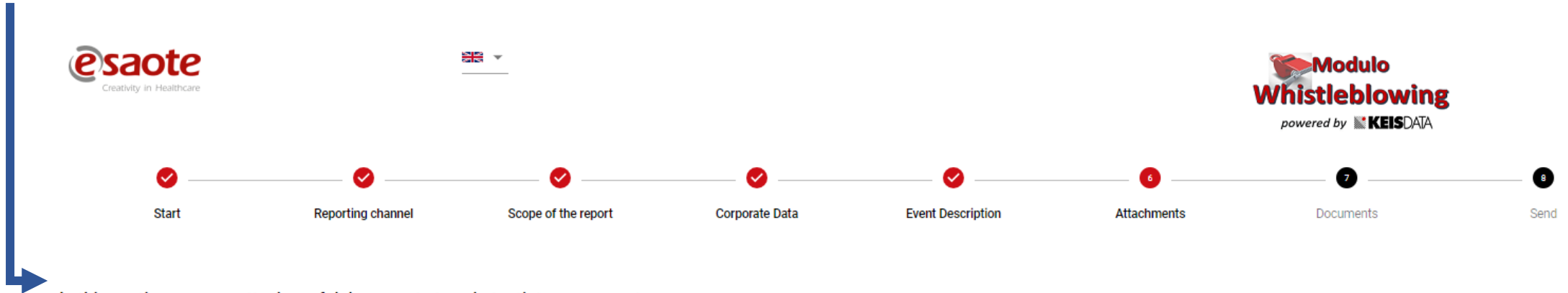
The screenshot shows the 'Event Description' step of a reporting process. At the top left is the 'esaote' logo with the tagline 'Creativity in Healthcare' and a UK flag dropdown menu. At the top right is the 'Modulo Whistleblowing' logo, 'powered by KEISDATA'. Below the logos is a progress bar with eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description', 'Attachments', 'Documents', and 'Send'. The 'Event Description' step is highlighted with a red circle and the number '5'. Below the progress bar, there are three lines of text: 'You can enter a text description of the event or ask for a direct meeting or proceed with a voice recording', 'Enter a brief description of the event or request a face-to-face meeting', and a checkbox labeled 'I authorize voice recording'. Below this is a large text input area with the placeholder text 'Enter a brief description of the event'.

IMPORTANT: No filters or distortions of any kind are applied to the voice if a recording is made.

ATTACHMENTS

6

In this section, the user can attach any useful documents to better contextualize the report



In this section you can attach useful documents to substantiate your report

ADD

DOCUMENTS

7

In this section the user can indicate whether he or she knows of any documents useful for reporting that he or she does not have, and also specify where they can be retrieved.

The screenshot shows the 'Modulo Whistleblowing' interface. At the top left is the 'esaote' logo with the tagline 'Creativity in Healthcare'. To its right is a language dropdown menu showing the UK flag. On the right side, it says 'Modulo Whistleblowing powered by KEISDATA'. Below this is a progress bar with eight steps: 'Start', 'Reporting channel', 'Scope of the report', 'Corporate Data', 'Event Description', 'Attachments', 'Documents', and 'Send'. The 'Documents' step is highlighted with a red circle containing the number 7, while the others have a red checkmark. Below the progress bar, the 'Documents' section contains the following fields:

- I am aware of documents useful for reporting filed in**
Indicate where the documents are stored
- Reachable in the following ways**
Indicate link or path to reach document folder
Indicate another method (ex: summon responsible person xyz)
- The facts have already been reported to another authority or internal entity**
 Yes
 No

In addition, the whistleblower may report whether he or she has already reported the offense to another Internal Person or Authority.

SEND

8

On the last screen the whistleblower is asked to confirm that he or she wishes to transmit the report, as well as to provide his or her identifying information.



Please note that the competent body that will take charge of the report is required to maintain the confidentiality of the identity of the whistleblower vis-à-vis the Company, except in cases expressly established by law (for example, upon specific request by the Judicial Authority).

Do you want to send your contacts to the Reporting Manager?

- Yes
- No

Name _____

Surname _____

Email _____

Phone _____

PREVIOUS

SEND

It should be noted that this communication channel, from the time the report is received and at every step thereafter, guarantees not only the confidentiality of the whistleblower's identity in the activities of managing the report, but also anonymity if the whistleblower does not wish to provide his or her contact information.

ASSIGNMENT OF ALPHANUMERIC CODE AND KEY

8



After the reporting is completed, the platform will issue the [alphanumeric code of the report and the corresponding key](#) to the whistleblower.

IT IS RECOMMENDED TO KEEP BOTH THE CODE AND THE KEY!!!

The Code and Key are essential to be able to keep track of the progress of the report and to respond to any requests for clarification or supplementation of information.