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UFI Filters Group (“the Group”) is committed to fostering a corporate culture based on ethical behaviour and good corporate governance, following the principles set out in the Group [redacted] and [redacted]

To keep fulfilling this commitment, UFI Filters Group recognises the importance of having a [redacted] (“the Policy”) governing reports of breach or suspected breach of law or regulation as well as serious misconduct that may adversely impact the Group.

The [redacted] is aimed to define the issues that may be reported and the rules to be respected by the whistleblowers, the whistleblowing channels, the role and responsibilities of the Regional and Group Whistleblowing Committees and the process to be followed to manage the reports.

The [redacted] is addressed to Headquarter, Subsidiaries and all their personnel, which include directors, officers, managers, employees, workers in every country in which UFI Filters Group operates; collectively referred to as the “Recipients”.

The issues that may be reported by Recipients under the [redacted] can refer to:

- alleged criminal activities (felony or misdemeanour), breaches, requests or incentives to breach laws or regulations;
- behaviours contrary to the Group [redacted], [redacted] or internal procedures;
- potential or actual serious violations relating to human rights, fundamental freedom violation, health and safety or the environment;
- retaliations for reporting any of the above issues or participating in the reporting.

Whistleblowing reports must be submitted in good faith, detailed and circumstantiated with precise information, to provide useful and appropriate information to effectively verify the validity of the events reported. The whistleblower should, reporting as objectively as possible and in detail:

- provide the names and job positions of the persons involved, or information that enables their identification;
- indicate the date and place of the event reported;
- provide all facts, information or documents (regardless of format or support) which can help substantiate the whistleblowing report. If the whistleblower is not sure that a particular fact is true, he/she must specify that it is an alleged fact;
- indicate when and how he/she became aware of the matter.

Whistleblowing reports may also be made anonymously. However, UFI Filters Group, conscious that it is more difficult to examine anonymous reports or to establish whether the allegations are substantiated,



recommends that reports include the whistleblower's name, so that the Regional and the Group Whistleblowing Committees



The Board of Directors of UFI Filters S.p.A. has appointed four Regional Whistleblowing Committees and one Group Whistleblowing Committee.

Regional Whistleblowing Committees are regional bodies responsible for:

- (i) collecting all whistleblowing reports received and carrying out a preliminary screening of reports submitted by whistleblowers;
- (ii) identifying among the whistleblowing reports received, those which - after having performed a preliminary screening -



1. How

All whistleblowing reports undergo a preliminary screening by the competent Regional Whistleblowing Committee in order to verify whether the report merits further checks to ascertain the veracity of the information reported (the "preliminary screening").

The Regional Whistleblowing Committee has to complete the preliminary screening report within 15 days from the date of receipt.

Such preliminary screening is aimed at verifying the reports in light of the provisions contained at Paragraph 3 ("Verification") and, in particular, the veracity of the information reported, the admissibility, the grounds, relevance and reliability of the whistleblowing report, the absence of a conflict of interest, the concordance and consistency of the factual elements on which the report is based.

If upon the completion of the preliminary screening the Regional Whistleblowing Committee considers that the report received is worth to be investigated further, it transmits by e-mail the report (after having translated it, if necessary) plus the preliminary screening notes to the Group Whistleblowing Committee.

If instead the Regional Whistleblowing Committee considers that the issues reported fall outside the scope of the present Policy or that the information provided are inadequate, it draws up a note explaining the analysis performed and the reasons for the dismissal of the whistleblowing report. In this event, on bi-monthly basis, the Regional Whistleblowing Committee transmits to the Group Whistleblowing Committee a list of the reports received and the notes drawn up.

The Group Whistleblowing Committee, after a review of such a list, may ask the Regional Whistleblowing Committee for further details and decide the opportunity of further analysis on the reports dismissed by the Regional Whistleblowing Committee.

All whistleblowing reports (including the preliminary screening notes) 0 1 535.3 452.11 Tm0 g0 G(-)]T#TQq0.000008871 0 55

1. How to Report



The Investigation Team carries out targeted verifications in relation to the information available on the whistleblowing report, which allow for the identification, analysis and evaluation of any elements that can confirm the reported issues.

At the end of the in-depth analysis the Investigation Team drafts the _____ which must:

- summarise the conduct of the investigation and the evidences;
- draw conclusions about the extent of any non-compliance;
- provide recommendations and suggest adequate action plans to remedy the non-compliance, which aim to ensure that it does not recur in the future (the "Action Plan(s)").

Investigation Report

Once it has received the _____, the Group Whistleblowing Committee evaluates its adequacy in terms of correspondence of the results obtained to the objectives of control and verification of the facts denounced in the whistleblowing report.

In the event that the Group Whistleblowing Committee considers necessary to perform further in-depth analysis, it interacts with the Investigation Team, asking it to carry out further checks.

After the analysis of the _____, the Group Whistleblowing Committee approves it, filing it along with the whistleblowing report in its specific archive and communicating the results _____ to the Board of Directors of UFI Filters S.p.A., _____ to the COO or CEO of the Region where the whistleblowing report has been submitted and _____ to the Head of the Department that may be involved in the contents of the whistleblowing report.

In such communications, the Group Whistleblowing Committee may provide recommendations on the actions to be implemented, including whether it is necessary to take disciplinary action.

In any case, the Human Resources Department will be the ultimate body to handle any disciplinary actions.

Acknowledgement will be provided to the person who issued the report within the period of three months from the date of acknowledgement of receipt of the report referred to in Section 6.1

The Group Whistleblowing Committee draws up a _____ of the activities carried out and the progress of the Action Plans set out in the _____ and transmit it to the Board of Directors of UFI Filters S.p.A.

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The Group Whistleblowing Committee and the Supervisory Boards of the Italian UFI Filters Group companies cooperate to ensure, within their respective areas of responsibility, the success of the Group whistleblowing system.

In particular, both the Group Whistleblowing Committee and the Supervisory Boards promptly transmit each other whistleblowing reports that can affect the respective areas of responsibility, coordinating their investigation activity.

The Group Whistleblowing Committee transmits to the Supervisory Boards of the Italian UFI Filters Group companies an extract of the _____ to the Board of Directors of UFI Filters S.p.A. with the detail of the whistleblowing reports concerning the respective Italian company and the relevant



Likewise, the Supervisory Boards transmit to the Group Whistleblowing Committee an extract of their periodic reports to the Boards of Directors concerning the whistleblowing reports received.

UFI Filters Group encourages Recipients to promptly report the issues defined at Paragraph 3 (“
”), and in doing so the Group guarantees the confidentiality of the identity of the whistleblower as well as of the whistleblowing report and the information it contains.

Reports cannot be used beyond what is necessary to adequately follow up on them.

The whistleblower identity will be kept confidential at all the stages of the process and will not be disclosed without the express consent of the reporting person, to persons other than those responsible for receiving or following up reports, expressly authorized to deal with such, unless the disclosure is required by local laws.

In the context of disciplinary proceedings, the identity of the reporting person will not be disclosed, where the disciplinary charge is based on investigations that are separate and additional to the report, even if consequent to the report. Where the charge is based, in whole or in part, on the report and the knowledge of the identity of the reporting person is indispensable for the defense of the accused, the report will be usable for the purposes of disciplinary proceedings only if the reporting person expressly consents to the disclosure of his or her identity.

Any kind of threat, retaliation, penalty or discrimination against the whistleblower (due to the submission of a report) or any member of the Investigation Team will not be tolerated. UFI Filters Group reserves the right to take the appropriate actions against anyone who retaliates or threatens to retaliate against the whistleblower who have submitted a report in accordance with this . Examples of retaliatory behaviour include (but are not limited to) harassment, denial of promotion, benefits or pay, reassignment or exclusion.

At the same time, the Group recognises the right of the affected parties to seek legal protection if the whistleblower is found to be criminally or civilly liable for falsehoods in his/her statements or reports.

UFI Filters Group will evaluate disciplinary actions for behaviours contrary to laws,
or internal procedures, attributable to Group personnel that emerge as a result of the investigation carried out on the whistleblowing reports.

As detailed at Paragraph 6.4 (“
”), the Group Whistleblowing Committee, once notified about the findings of the investigation, will provide to the Board of Directors of UFI Filters S.p.A., to the COO or CEO of the Region where the whistleblowing report has been submitted and to the Head of the Department that may be involved, recommendations on the actions to be implemented, including whether it is necessary to take disciplinary action.

The UFI Filters Group will take appropriate disciplinary and/or legal measures to protect its rights, assets and reputation against anyone who, in bad faith, has made false, unfounded or opportunistic reports and/or has made reports for the sole purpose of defaming, slandering, or causing damage to the reported party or to other parties mentioned in the whistleblowing report.