

Whistleblowing Policy

Contents

1.	Purpose	3
2.	Scope	3
3.	Definitions.....	3
4.	Scope	5
4.1.	Whistleblowers: Who can make the report?	5
4.2.	Reportable Concerns: What can be reported?	5
5.	Content of the Report	6
6.	Reporting Channels	7
6.1.	Internal reporting channels.....	7
6.2.	Deviations	7
6.3.	External Reporting Channels.....	8
7.	Governance	10
7.1.	Whistleblowing Committee.....	10
7.2.	Potential conflict of interests	10
8.	Handling the Reports.....	11
8.1.	Preliminary check	11
8.2.	Assessment of the Report	11
8.3.	Investigation.....	12
8.4.	Closure of the Report and follow-up	12
9.	Protections and Safeguards for the Whistleblower	14
9.1.	Prohibition of Retaliations	14
9.2.	Confidentiality.....	14
10.	Privacy and data protection.....	16
11.	Training.....	17
12.	Sanctions and disciplinary proceedings	17
13.	Dissemination and updates.....	17
14.	Annex 1.....	18

1. Purpose

The purpose of this Policy is to describe and discipline the reporting system implemented by the Galileo group which comprises Galileo Green Energy GmbH and all its wholly owned subsidiaries and to provide useful indications for whistleblowers in relation to lodging a Report and outlining the management process.

2. Scope

This Policy applies to Galileo Green Energy GmbH and all its wholly owned subsidiaries.

Galileo's expectations for its non-wholly owned subsidiaries (e.g., joint ventures) are that they should have in place an appropriate reporting system and underlying policies, procedures, and controls to provide comfort from a compliance perspective.

However, responsibility for implementing the appropriate reporting system and underlying policies in non-wholly owned subsidiaries rests with the management or the legal department of each entity (where present).

The Legal Group Department will act to support and influence the implementation and operation of the strategy of such policies as a material shareholder to the extent possible, considering the position of other shareholders and other such context as is relevant on a legal-entity-by-legal-entity basis.

The implementation of an appropriate reporting system can be subject to audit by Galileo.

The document further provides indications on the conditions and modes for accessing what are known as external reporting channels, as the one set up by the competent national authorities and public dissemination, as well as the possibility of lodging reports with the Judicial Authority.



For a **practical guide** to the Policy in action, see **Annex 1 – “Galileo Whistleblowing Policy: Speak Up, We’ve Got Your Back”**, crafted to support everyday use and awareness.

3. Definitions

Code of Ethics: mean the document outlines the principles and values guiding Galileo's behavior and standards for all employees and stakeholders. It provides ethical guidelines and expectations to foster ethical values within the organization.

Competent Authority: means any national authority designated to receive reports in accordance with the Whistleblowing Directive and give feedback to the reporting person, and/or designated to carry out the duties provided for in the Whistleblowing Directive, in particular as regards follow-up.

Facilitator: means a natural person who assists a reporting person in the reporting process in a work-related context, and whose assistance should be confidential.

Internal Channels: means designated reporting methods established within Galileo to facilitate the confidential submission of Whistleblower Reports, ensuring protection and compliance with relevant legal and organizational guidelines.

IT Platform: mean the secure digital infrastructure provided by Galileo for the submission and

management of Reports. This platform ensures confidentiality, data protection, and an efficient process for handling reports.

Local Whistleblowing Regulations: mean the set of national or regional legal provisions governing the process of whistleblowing. This includes laws and regulations in force in the jurisdiction where Galileo operates, such as the specific whistleblowing decree or directive applicable to that country.

Model 231: means the internal organizational and control system adopted under Legislative Decree No. 231/2001 to prevent crimes and limit the company's liability, by promoting compliance with laws and ethical standards.

Person Involved: means a natural or legal person who is referred to in the report or public disclosure different from the person to whom the breach is attributed.

Policy: means this official document outlines the processes, steps, and protocols for the management of Whistleblower Reports within the organization. It ensures compliance with applicable regulations and guarantees the protection of Whistleblowers and other parties involved.

Public Disclosure: means the making of information on breaches available in the public domain.

Report: means the oral or written communication of information on breaches.

Reported Person: means a natural or legal person who is referred to in the Report or public disclosure as a person to whom the breach is attributed or with whom that person is associated.

Reportable Concerns: means any information relating to actual or potential breaches of legal obligations, including but not limited to, criminal offenses, violations of EU law, fraud, corruption, and serious risks to public health, safety, or the environment as better detailed at par. 3.2.

Retaliation: means any direct or indirect act or omission which occurs in a work-related context, is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the Whistleblower.

Whistleblower: means a natural person who reports or publicly discloses information on breaches acquired in the context of his or her work-related activities.

Whistleblowing Committee: means the designated body within the company that is responsible for receiving, managing, and investigating the facts under Reports. The committee ensures adherence to Galileo's WB Policy and compliance with legal and ethical standards during the process.

Whistleblowing Decree: means Italian Legislative Decree No. 24/2023 or any other Local Whistleblowing Regulations that regulate whistleblowing activities, outlining the rights and protections for Whistleblowers and the obligations of the organization in managing reports.

Whistleblowing Directive: means the European Union Directive 2019/1937 or other similar legislative acts that provide a legal framework for Whistleblower protection across member states. It establishes the minimum standards for handling Reports and ensuring Whistleblowers are protected from Retaliation.

Working Context: means current or past work activities in the public or private sector through which,

irrespective of the nature of those activities, persons acquire information on breaches and within which those persons could suffer retaliation if they reported such information.

4. Scope

4.1. Whistleblowers: Who can make the report?

Reports may be submitted by any person employed by Galileo on a permanent or fixed-term contract, whether full-time or part-time, including those under contracts for intermittent work, apprenticeships, casual work or service provision, as well as occasional service providers. This includes all self-employed workers (excluding entrepreneurs, including small business owners), persons engaged in coordinated and continuous cooperation, trainees, volunteers, apprentices, and persons exercising administrative, managerial, supervisory or representative functions (including de facto functions), shareholders, and employees or associates of enterprises supplying goods or services or carrying out work on behalf of third parties. In addition, freelance professionals and consultants working with or for Galileo are also included.

The term "Whistleblower" also includes: (i) those whose legal relationship with the Company has not yet commenced, if the information regarding violations was obtained during the recruitment process or other pre-contractual stage; (ii) those who are in a probationary period; and (iii) those whose relationship with the Company has ended, if the information regarding violations was obtained during their tenure.

4.2. Reportable Concerns: What can be reported?

Whistleblowers may Report any conduct, action or omission that may compromise the integrity of Galileo and that has come to their attention in the course of their work. Such concerns may include, but are not limited to:

- Administrative, accounting, civil, and/or criminal offenses: including those relevant to the administrative/criminal liability of companies committed in violation of applicable regulations in the jurisdictions where Galileo operates.
- Unlawful behavior of relevance under Legislative Decree No. 231/2001 and violations of Model 231, including actions that contravene Galileo's Code of Ethics and/or internal policies and procedures.
- Any misconduct within the scope of the Whistleblowing Directive, related to the following sectors: public procurement; financial services, products, and markets; prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and animal feed safety; animal health and welfare; public health; consumer protection; safeguarding of private life and personal data; and security of information and communication systems (see Appendix 1 for details).
- Violations of policies and procedures related to harassment, conflict of interest, health and safety, and environmental standards, as well as any conduct, including omissions or practices, that could cause economic harm or reputational damage to Galileo, its personnel, or third parties.
- Acts or omissions that undermine the financial interests of the European Union, such as fraud, corruption, or any other illegal activities involving EU expenditure.
- Acts or omissions affecting the domestic market, including violations relating to competition law or state aid provisions.
- Acts or behaviors that undermine the effectiveness or purpose of regulations established under the European Union's framework.

These exclude:

- Complaints, grievances or requests relating to the personal interest of the whistleblower and relating solely to his or her own employment or matters involving interaction with his or her superiors.
- Reports relating to matters of national defense and security.
- Reports relating to breaches already covered by the Whistleblowing Directive which provide for specific reporting procedures in certain specialized sectors (e.g. financial services, anti-money laundering, combating the financing of terrorism, transport safety and environmental protection).

5. Content of the Report

To enhance the effectiveness of verification and management activities, it is encouraged that Reports contain all available information as clearly and comprehensively as possible, providing useful and relevant elements to facilitate an appropriate verification of the facts reported. It is particularly important that Reports are submitted promptly and, to the extent known to the Whistleblower, include:

- A detailed description of the reported facts, including known circumstances (method, time and place) and how the information was obtained.
- Identifying details of the Reported Person and the other Persons Involved, if known, or elements that may assist in their identification.
- Names of other people who may provide information about the reported facts.
- Indication or, if available, provision of any documents that may support the validity of the report, in addition to the identifying information of the Whistleblower (e.g. name and contact details), if the option of anonymity has not been chosen.

Although anonymous reports will be accepted, it is recommended that Reports be submitted with identifying information to facilitate communication with the Whistleblower and to provide feedback on the status of the investigation. The guarantees and protections for the Whistleblower are detailed in paragraph 8, which is referred to. Anonymous reports will be treated in the same way as regular reports and will only be considered if sufficiently substantiated.

6. Reporting Channels

Galileo has established several equivalent internal reporting channels to ensure the effectiveness of the reporting process. It also provides guidance to whistleblowers who may need to use external reporting channels.

6.1. Internal reporting channels

Galileo ensures the transmission and management of reports through dedicated internal channels via an electronic platform (Whistleblowing Platform) that guarantees the separation, security and protection of data and the confidentiality of the Report and related documentation. This is achieved through an advanced encryption system in accordance with applicable regulations. Reports may be made in writing or verbally using the following methods:

- **IT Platform:** the recommended tool for submitting Reports, accessible to all Whistleblowers (employees and non-employees) through Galileo's website at the following link: <https://galileoenergy.integrityline.com/>
- **In-person meeting:** the Whistleblowing Committee is available to meet with the Whistleblower, upon request via IT channels or e-mail (compliance@galileo.energy). The content of the meeting will be documented, and the Report will be signed by the Whistleblower and properly archived.

The IT Platform allows Reports to be submitted through a guided online process, without the need to register or provide personal details. Even if personal details are provided, the IT Platform ensures the confidentiality of the Whistleblower's identity, including through the use of encryption tools.

Through an integrated messaging system on the IT Platform, the Whistleblowing Committee can communicate confidentially with the Whistleblower, confirming receipt of the Report, requesting additional information if necessary, and providing feedback on the conclusion of the investigation and archiving of the Report in accordance with the deadlines set by the applicable regulations.

6.2. Deviations

Anyone who receives a Report outside of the internal reporting channels (e.g., emails, anonymous letters to management or company executives, social media reports, verbal reports, etc.) must:

- Inform the Whistleblower, if the Whistleblower can be contacted, of the importance of submitting the Report through the internal reporting channels.
- Forward the received Report (in its original form, including any attachments) to the Whistleblowing Committee through the internal reporting channels as soon as possible, but no later than 7 days after receipt, identifying the source, if known, and any additional details that would allow for a thorough investigation.
- Notify the person who submitted the Report that it has been forwarded to the Whistleblowing Committee, if that person can be contacted.

To better protect the Whistleblower and to ensure compliance with the protections afforded by the applicable regulations, it is essential that the official reporting channels are used. An acknowledgement of receipt of the Report will be provided to the whistleblower by the Whistleblowing Committee, where possible, within **7 days** of receipt of the report.

6.3. External Reporting Channels

The Local Whistleblowing Regulations transposing the Whistleblowing Directive provide for the possibility, under certain conditions, to report possible violations through a public external reporting channel, which is normally entrusted to specific national authorities designated by law, in addition to the internal channels.

The conditions for submitting a Report through external channels are:

- The Internal Channel has not been established by an entity required to do so, or where such a channel, even if in place, is not operational.
- The Internal Channel in use does not comply with the provisions of the Whistleblowing Directive and/or the Whistleblowing Decree or of the other Local Whistleblowing Regulations.
- The Report made through the Internal Channel does not lead to any outcome.
- The Whistleblower has reasonable grounds — based on specific, precise, and consistent circumstances — to believe that submitting a Report via the Internal Channel would not be effectively addressed or may expose the Whistleblower to the risk of retaliation.
- The Whistleblower has reasonable grounds — based on specific, precise, and consistent circumstances — to believe that the violation may pose an imminent or clear threat to the public interest.

Here are the links to the relevant platforms or authorities for external whistleblowing Reports in the countries where Galileo operates.

Country	Authority	Portal
Italy	National Anti-Corruption Authority (ANAC)	https://www.anticorruzione.it/-/whistleblowing
Spain	Autoridad Independiente de Protección del Informante	https://www.antifraucv.es/en/inicio-en/
France	Défenseur des droits	https://www.defenseurdesdroits.fr/
Poland	Państwowa Inspekcja Pracy	https://www.pip.gov.pl/
German	Bundesamt für Justiz	https://www.bundesjustizamt.de/DE

A Whistleblower may also proceed with a public disclosure of information through the press, electronic means, or any other channels capable of reaching a large audience under the following conditions:

- The Whistleblower has previously submitted a Report through the Internal and External Channels or has directly lodged an external Report, but no appropriate action was taken in response to the report within the timeframe provided by the Local Whistleblowing Regulations; or
- The Whistleblower has reasonable grounds to believe that: (i) the breach may constitute an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage; or (ii) in the case of external reporting, there is a risk of retaliation or there is a low prospect of the breach being effectively addressed, due to the particular circumstances of the case, such as those where evidence may be concealed or destroyed or where an authority may be in collusion with the perpetrator of the breach or involved in the breach; or

- The Whistleblower has reasonable grounds to believe that external reporting may expose them to retaliation or may not be adequately addressed due to the unique circumstances of the case. This includes situations where evidence may be concealed or destroyed, or where there is a credible fear that the person receiving the Whistleblowing report may be colluding with the perpetrator or involved in the violation itself.

This protection does not apply to cases where a person directly discloses information to the press pursuant to specific national provisions establishing a system of protection relating to freedom of expression and information.

Violations of national law (including unlawful conduct relevant under Legislative Decree no. 231/2001 and violations of the organisation and management models provided for in Legislative Decree no. 231/2001 relevant under Italian law) may be reported through the use of internal channels, or through the use of the external channel for matters falling within the specific competence of the public authorities as shown in the above chart (public contracts, transparency, violation of anti-corruption rules, impartiality of public officials), or of the judicial and/or accounting authority or other competent administrative authority appointed in the relevant country where the violation is committed.

Breaches of EU law can be reported using internal and external channels, Public Disclosure and whistleblowing.

7. Governance

7.1. Whistleblowing Committee

In accordance with the Whistleblowing Directive, Galileo has delegated the management of the Internal Reporting Channels to a collegial body responsible for the handling of reports, namely the Whistleblowing Committee, composed of specially trained personnel who meet the autonomy requirements established by the legislation.

The companies within Galileo all employed an average of 249 employees or less last year, allowing them to share the management of their respective Internal Reporting Channels, thus creating a single reporting management body.

The composition of the **Whistleblowing Committee** is as follows:

- Group Compliance Manager
- General Counsel
- Group HR Director

7.2. Potential conflict of interests

In the case of Reports regarding one or more members of the Whistleblowing Committee a report can be sent directly through the relevant External Channel in the ways indicated in paragraph 1.5.3. above, without prejudice to the Whistleblower's option to inform their own line manager or the Chief Executive Officer directly.

8. Handling the Reports

The process for handling and verifying Reports consists of four phases:

- 1 Preliminary check:** receipt of the Report.
- 2 Assessment of the Report:** assessment of the admissibility of the Report.
- 3 Investigation:** assessment of the topics covered in the Report.
- 4 Closure of the Report and Follow-up:** analysis and validation of the results of the investigations carried out and monitoring of any corrective or improvement actions identified.

All personnel and corporate structures potentially involved in the management of Reports are required to provide the necessary cooperation at each stage of the process to ensure the efficient and effective management of the activities, while respecting confidentiality and the safeguards established in this Policy.

8.1. Preliminary check

Upon receiving a Report via the Internal Channels, the Whistleblowing Committee promptly verify the absence of any conflict of interest of its members.

Immediately after this check the Whistleblowing Committee should notify the Whistleblower about the receipt of the Report through the IT Platform, within **7 days** at the latest. The notification does not confirm the Report's admissibility.

The Whistleblowing Committee assigns each Report a unique ID for clear tracking, and logs it in the Whistleblowing Register, which includes key details such as:

- Unique ID/reference number
- Date of receipt
- Submission channel
- Report classification (e.g., a) not relevant; b) non-actionable; c) relevant and actionable)
- Start date of investigation (if applicable)
- Investigation method, internal/external parties involved, and their roles
- Conclusion

8.2. Assessment of the Report

The Whistleblowing Committee ensures timely handling and initial assessment of the Report. If needed, it may request additional information or documentation from the Whistleblower to support a thorough evaluation, always using the Internal Whistleblowing Channels.

Following the preliminary check and evaluation, the Whistleblowing Committee classifies the Report into one of the following categories, each triggering a specific workflow for its management:

- **Non-relevant Report:** the Report does not pertain to Reportable Concerns under the applicable laws or is submitted by individuals who do not fall under the definition of Whistleblowers. In such cases, the Whistleblowing Committee files the report and, if appropriate, refers it to other relevant company departments.
- **Non-actionable Report:** a Report that, upon completion of the preliminary examination

and/or after requesting further information, lacks sufficient factual elements to justify an investigation, contains overly vague content that prevents a clear understanding of the facts, and/or is accompanied by irrelevant or inadequate documentation.

- **Relevant and Actionable Report:** If the Report is found to fall within the scope of the Whistleblowing Decree and this Policy, and is sufficiently detailed and/or documented, the Whistleblowing Committee initiates the investigation and verification process, as described in the next section.

In all cases, the Whistleblowing Committee formalizes the evaluation, providing clear justification for the chosen classification in the Whistleblowing register.

In Italy, if the Report may constitute a relevant offense under Legislative Decree No. 231/2001 it must always be shared with the Supervisory Board of the relevant company («OdV») who should also be informed on the outcome of the preliminary analysis.

8.3. Investigation

If the Report is deemed “Relevant” and “Actionable,” the Whistleblowing Committee shall:

- Handle the Report in cooperation with the relevant departments of the Company to verify (or arrange for the verification of) the facts reported, in particular based on the evidence provided by the Whistleblower.
- Notify the Reported Person (after taking the necessary steps to preserve evidence, if required).
- Recommend appropriate action, if necessary.

During the investigation, while ensuring confidentiality and the protection of the Whistleblower, any necessary measures may be taken to assess the validity of the Report. For this purpose, the Whistleblower and other persons who can provide relevant information for the verification of the facts may be interviewed and any documents useful for the investigation may be obtained.

If the verification of the facts is not jeopardized, the Reported Person may be informed of the Reports against him or her; in any case, the confidentiality of the Whistleblower and the other Person Involved in the Report must be protected.

In Italy, if the report may constitute a relevant or threatened offense under Legislative Decree No. 231/2001, the OdV, in coordination with the Whistleblower Committee, may assign the necessary investigative activities for the verification of the violation to specialized external consultants, using the budget provided by the company.

8.4. Closure of the Report and follow-up

Investigative activities shall be conducted within a reasonable timeframe. If the process is extended, initial feedback shall be provided to the Whistleblower within three months from the date of acknowledgment of receipt or, if no acknowledgment is provided, within **three months** from the expiration of the **seven-day** period following the submission of the Report. Final feedback shall be given upon the conclusion of the investigation.

If the Report is found to be unfounded or excessively vague, and no further elements are provided or are deemed insufficient, the report will be dismissed by a reasoned measure.

In the case of a confirmed violation, the findings of the investigation will be communicated to Galileo's Executive Management and disciplinary proceedings may be initiated against the Reported Person.

In Italy, if the Report may constitute a relevant offense under Legislative Decree No. 231/2001, the Whistleblowing Committee should prepare an internal report to the OdV to inform its members about the findings of the investigations.

Reports will be collected and stored in a dedicated archive, which will only be accessible to members of the Whistleblowing Committee. The Report and related documentation may not be kept for more than **5 years** from the date of communication of the outcome of the Report unless further activity and investigations are carried out.

The Whistleblowing Committee monitors the actual implementation of any corrective and/or improvement actions by the relevant company functions, informing the Executive Management (as well as the OdV for what concerns Italy) about the monitoring activities carried out.

In any case, each year, the Whistleblowing Committee will provide the CEO/ Board of Directors with a quantitative and qualitative overview of the Reports received at group level, including:

- The number of Relevant and Actionable Reports
- The number of Non-Actionable Report
- Any other relevant information concerning the Reports

In Italy, the Whistleblowing Committee is also required to prepare a periodic report to the OdV at least annually, and in any case, before the issuance of the annual report by the OdV pursuant to Legislative Decree No. 231/2001. This report should include, among other things, a summary of the whistleblowing management activities, detailing the outcomes of the related investigations, the status of corrective actions identified, as well as information on training and awareness activities.

9. Protections and Safeguards for the Whistleblower

Galileo confirms that no employee may be disciplined, dismissed or face any direct or indirect discriminatory measures for having used this Policy in good faith to report facts of which he or she was personally aware in the performance of his/her duties, even if the report turns out to be unfounded after investigation.

9.1. Prohibition of Retaliations

No form of Retaliation or discrimination, whether direct or indirect, against the Whistleblower for reasons related, as a whole or in part, directly or indirectly, to the Report is tolerated, including threats of retaliation and attempts of Retaliation including in particular in the form of:

- Suspension, lay-off, dismissal or equivalent measures.
- Demotion or withholding of promotion.
- Transfer of duties, change of location of place of work, reduction in wages, change in working hours.
- Withholding of training.
- A negative performance assessment or employment reference.
- Imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty.
- Coercion, intimidation, harassment or ostracism.
- Discrimination, disadvantageous or unfair treatment.
- Failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment.
- Failure to renew, or early termination of, a temporary employment contract.
- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income.
- Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry.
- Early termination or cancellation of a contract for goods or services.
- Cancellation of a licence or permit.
- Psychiatric or medical referrals.

The prohibition of retaliatory and discriminatory measures against the Whistleblower is also extended to:

- Facilitators.
- Individuals in the same Working Context as the Whistleblower and who have a stable emotional or family relationship with them within the fourth degree of kinship.
- Colleagues of the Whistleblower who have a regular and ongoing relationship with them.
- Entities owned by the Whistleblower or for which they work, as well as entities in the same Working Context as the individual.

9.2. Confidentiality

Reports may only be used as necessary to provide adequate follow-up. The confidentiality of the Whistleblower's identity, the Reported Person and of the Persons Involved, as well as the Report itself and any related documentation, is protected at all stages and in every context following the Report. In particular, the identities of these individuals and any other information that may directly or indirectly reveal their identities cannot be disclosed without the express consent of the Reported Person.

In any disciplinary proceedings, the identity of the Whistleblower may only be disclosed if all the following conditions are met:

- The allegation is wholly or partly based on the content of the Report.
- Knowledge of the Whistleblower's identity is absolutely necessary for the defence of the Reported Person.
- There is express consent from the Whistleblower to disclose their identity.

Violating confidentiality obligations constitutes a breach of official duties, leading to disciplinary responsibility and the imposition of related sanctions.

10. Privacy and data protection

All processing of personal data, including communication between the competent authorities, as outlined in this Policy and Whistleblowing Directive, the Whistleblowing Decree and the other Local Whistleblowing Regulations, shall be carried out in accordance with Regulation (EU) 2016/679 and any national applicable law and Directive (EU) 2016/680. Any exchange or transmission of information by Union institutions, bodies, offices or agencies shall be undertaken in accordance with Regulation (EU) 2018/1725.

Personal data which are manifestly not relevant for the handling of a specific Report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

The processing of personal data related to the receipt and management of Reports is carried out by Galileo, as the data controller, in accordance with the principles set out in Articles 5 and 25 of the GDPR. This includes providing appropriate information to Whistleblowers and involved parties as stipulated in Articles 13 and 14 of the GDPR, as well as implementing measures to protect the rights and freedoms of data subjects.

Members of the Whistleblowing Committee are designated as authorized data processors under Article 29 of the GDPR.

Galileo establishes appropriate technical and organizational measures to ensure a level of security commensurate with the specific risks associated with the processing activities, based on a data protection impact assessment, and regulates its relationships with any external providers that process personal data on its behalf in accordance with Article 28 of the GDPR.

11. Training

Employees must comply with this Policy and attend training on Whistleblowing, Local Whistleblowing Regulations, the Code of Ethics and local compliance programs.

Members of the Whistleblowing Committee must receive specific training on how to handle Reports, which should include ongoing updates based on regulatory and legal developments and best practices.

12. Sanctions and disciplinary proceedings

Galileo will impose sanctions for any unlawful behaviour, in accordance with the provisions of the Whistleblowing Directive, the Whistleblowing Decree and other Local Whistleblowing Regulations that may be attributed to the Company's employees and that is revealed because of the verification of Reports made under this regulatory framework.

Disciplinary measures, as provided by law and applicable collective bargaining agreements, will be proportionate to the seriousness and gravity of the confirmed unlawful behaviour and may extend to the termination of the employment relationship.

In particular, the Company will impose sanctions when:

- There has been no retaliation, or it has been determined that there has been obstruction or attempted obstruction of the Report. In addition, there has been a breach of the confidentiality obligations set out in the Whistleblowing Policy, the Whistleblowing Decree and other relevant Local Whistleblowing Regulation.
- Reporting and management procedures for reports have not been implemented or do not comply with the requirements specified in the Whistleblowing Directive, the Whistleblowing Decree, and other relevant Local Whistleblowing Regulation. This includes situations where the review and analysis of the reports received have not been carried out.
- The criminal liability of the Whistleblower for defamation, libel or similar offenses committed while reporting to judicial or accounting authorities has been established, or their civil liability for the same reasons in cases of intent or gross negligence.

13. Dissemination and updates

This WB Policy will be widely disseminated. To this end, it will be sent to:

- Each member of the Board of Directors, the local Supervisory Board (where established) and the Management Team.
- Every employee through the communication strategies deemed most effective by the company.

This Policy will also be published on Galileo's website.

14. Annex 1

Galileo Whistleblowing Policy – Speak Up, We've Got Your Back

At Galileo, we know that real integrity means making it safe to speak up. If something doesn't look right, we want to hear about it – without any fear of negative consequences. This Policy is your guarantee that concerns will be taken seriously and handled properly. This Policy implements EU Directive 2019/1937, establishing secure reporting channels for breaches of EU law and national regulations as defined in Article 4.2 of the Directive.

Core principles:

- **Protection:** zero tolerance for retaliation; confidentiality guaranteed.
- **Scope:** covers legal breaches, fraud, ethical violations, and EU law infringements (excludes personal grievances).
- **Governance:** managed by an independent Whistleblowing Committee (Compliance, Legal, HR).

How to raise a concern – Internal and External channels

How to file Reports? You have got options:

- **Web Platform:** our anonymous online portal <https://galileoenergy.integrityline.com> is available 24/7.
- **In-person meeting:** prefer to talk in person? Request a confidential meeting with our Whistleblowing Committee upon request via e-mail (compliance@galileo.energy).
- **External Channel:** under certain conditions, it is possible to report possible violations through a public external reporting channel, which is normally managed by specific national authorities designated by law, like ANAC (Italy) or equivalent bodies in other countries.

Whistleblowing Committee:

In accordance with the Whistleblowing Directive, Galileo has delegated the management of the Internal Reporting Channels to a collegial body responsible for the handling of reports, namely the Whistleblowing Committee, composed of specially trained personnel who meet the autonomy requirements established by the legislation.

Our Whistleblowing Committee isn't just a department - it's your safeguard!

The composition of the **Whistleblowing Committee** is as follows:

- Group Compliance Manager
- General Counsel
- Group HR Director

What's Next?

- **We'll listen:** your Report gets acknowledged within 7 days.
- **We'll investigate:** our Whistleblowing Committee will look into it thoroughly conducting proper investigations.
- **We'll update you:** you'll get feedback within 3 months.
- **We'll take action:** if a wrongdoing is found and the report is validated, appropriate action will be taken.

What concerns as Reportable?

We want to know about:

- Financial misconduct or fraud
- Ethics violations
- Safety or environmental risks
- Legal breaches
- Any behavior that goes against our Code of Ethics

(Note: Personal HR grievances should go through normal channels)

Whistleblower Protections - Your Safety Comes First

We guarantee you:

- **Complete confidentiality:** your identity stays protected at every stage - we only disclose when legally required.
- **Zero tolerance for Retaliation:** no dismissal, demotion, or professional harm for speaking up.
- **Legal safeguards:** special protection for facilitators and colleagues; company bears burden of proof in retaliation cases.

Our Commitment to You

This isn't just about compliance – it's about doing what's right. By speaking up, you're helping us maintain Galileo's culture of integrity. We'll make sure:

- Every report gets proper attention
- No one faces backlash for good-faith reports
- We continuously improve based on what we learn

Ready to Speak Up?

Visit our whistleblowing portal or check the full policy for more details. Remember: When you report concerns, you're not just protecting the company – you're protecting all of us.

The Whistleblowing Directive gives you rights - we built processes to enforce them!

Authority to Approve	Board of Directors
Policy Owner	General Counsel
Author	Group Compliance Manager
Current Version	V.2
Approval Date	27 May 2025
Review Cycle	biennial
Due for Review	May 2027

Version Control

Version	Revision Date	Author	Description
1.0	October 2020	CEO	First Edition
2.0	May 2025	Group Compliance Manager	Revision – updated in relation to the EU Directive 2019/1937