



ETHICS & COMPLIANCE -PROGRESS SUMMARY REPORT 2025/26

Our Ethics & Compliance Framework Programme is a commitment to continuous improvement that encompasses business ethics, employment ethics and our responsibility to operate as a sustainable business.

The dynamic framework has been established to embed our culture of integrity into every aspect of our business, including decision making, risk assessments, dedicated policies and procedures, training and ongoing monitoring. Each year, we report on the progress we have made across key areas.

- Throughout the reporting period, Galileo continued to enhance its Ethics & Compliance Framework across the Group, **further embedding integrity, accountability and responsible business conduct into our governance model.**
- As part of a broader review of the Group's policy architecture, Galileo completed a **full review of its Group Compliance policies** and introduced new policies where needed. This included the **Conflict of Interest Policy** and the related **Party Transactions Policy**, to provide clear guidance and ensure fair, transparent and unbiased decision making.
- Access to policies was also strengthened, with employees able to consult them through multiple channels, including **Group and local intranets.**
- Galileo also continued to foster a strong **speak-up culture** across the organisation. In 2025, this included the implementation of a new **Whistleblowing Policy**, fully aligned with the **EU Whistleblowing Directive** and applicable national legislation, the launch of a new **investigation framework** based on risk-based triage and clear allocation of responsibilities, and the migration to an **enhanced whistleblowing platform.**
- **Awareness initiatives were further expanded** to help employees and contractors understand how and when to use reporting mechanisms, including through onboarding processes for new employees.
- To support transparency and oversight, Galileo collects **monthly reports on meetings with public authorities** from all of our wholly-owned subsidiaries. In addition, the Group achieved **100% traceability of conflicts of interest**, supported by both annual and pre-employment declarations.
- In parallel, Galileo reinforced its **third-party compliance framework** by adopting a risk-based approach to third-party management, supported by due diligence, ongoing monitoring and regular engagement. A structured **third-party due diligence** process is now in place, while **pre-transaction compliance due diligence** is also carried out in the context of M&A activities.
- Finally, Galileo completed **Code of Ethics, Whistleblowing and Compliance policies training for 100% of Galileo Platform employees**, further strengthening awareness, consistency and accountability across the Group.