

Issued by: HSEQ DEPARTMENT	Approved by: CEO	Date 23/11/2023	Revision 3	Page 1 of 2
SAFETY MANAGEMENT MANUAL According to IMO Resolution A.741(18), as amended – ISM Code				
<b>MANAGEMENT COMMITMENT &amp; OTHER COMPANY POLICIES</b> <b>ANNEX TO COMPANY SQE POLICY</b>				
<b>This annex is reprinted when necessary. It is not subject to Certifying Body (RINA) approval and its change should not be recorded in the manual's revisions checklist.</b>				

## WHISTLEBLOWING POLICY

Fratelli d'Amico Armatori is committed to conduct all aspects of its business with honesty and integrity and to provide a working environment where high standards of ethical, moral and legal business conduct are encouraged and safeguarded.

The Company is confident in the comprehensiveness and effectiveness of its Safety Management System and its role in ensuring the safety of people and the environment, as well as in the effectiveness of its existing reporting channels.

This Whistleblowing Policy has been developed to encourage employees and its stakeholders, who have serious concern about any aspect, to come forward with their concerns without fear of reprisal or discrimination over such reports made in good faith.

The Whistleblowing Policy address concerns related to issues of public interest, including, but not limited to, the following:

- Criminal offence or activity such as fraud or theft or bribery and kickbacks;
- Breaches of Company Policy and Procedures, particularly health, safety and environmental violations;
- Dishonesty, either verbal or written (including intentionally maintaining official log books or records inaccurately);
- Malpractice or unethical conduct / behaviour that does not reflect the Fratelli d'Amico Armatori values;
- Miscarriages of justice;
- Offences under Law Decree 231, and
- The deliberate concealment of any of the above.

The Company's Management maintains an open-door policy endeavouring to address individuals' concerns through the following internal reporting channels:

- *by phone, to Organismo di Vigilanza (OdV) at 0039 / 3518434570 from Monday to Friday between 08:00 to 19:00 (UTC+1)*
- *by e-mail, to Organismo di Vigilanza (OdV) at [odv@damicofratelli.it](mailto:odv@damicofratelli.it)*
- *by requiring a private meeting with the Organismo di Vigilanza (OdV)*
- *via website at [www.damicofratelli.it](http://www.damicofratelli.it) section whistleblowing hotline*

Above reporting channels are managed by the *Organismo di Vigilanza (OdV)* which has been appointed as the addressee of offences defined by D.Lgs 231/2001 and D.Lgs 24/2023.

All concerns are treated confidentially and you can report anonymously, unless you decide to disclose your identity.

Every concern about possible misconduct is investigated ensuring there is no retaliation against anyone reporting a concern in good faith.

Any victimization of a reporting person who "whistle-blows", or any attempt to deter him / her from reporting, will be regarded as a serious disciplinary offense and will result in action under the Disciplinary Procedures.

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The whistleblower who incurs the crimes of defamation or slander or, in any case, for the same crimes committed with the complaint to the judicial or accounting authority is subject to the sanctions pursuant to art. 21 of Legislative Decree n. 24/23.