

POLICY FOR THE PREVENTION OF DISCRIMINATION, HARASSMENT AND WHISTLEBLOWER PROTECTION

1. Purpose

Subbyx S.r.l. Società Benefit is committed to promoting a safe, fair, and respectful work environment that upholds the dignity of every individual. With this policy, the company aims to:

- Prevent and combat all forms of discrimination, harassment, and abuse of power that may compromise the psychological and physical well-being of individuals, whether in-person or remotely.
- Provide a clear, secure, and accessible system for reporting unlawful conduct, misconduct, or behavior contrary to company values.
- Promote a corporate culture rooted in ethics, transparency, responsibility, and inclusion, while valuing diversity and ensuring equal opportunity.
- Comply with Legislative Decree 24/2023, which implements EU Directive 2019/1937 on the protection of whistleblowers.

2. Scope of Application

This policy applies to anyone operating in any capacity within or on behalf of Subbyx, including:

- Permanent and fixed-term employees
- Collaborators, consultants, freelancers, interns, and trainees
- Board members, managers, advisors, and active investors
- Suppliers, subcontractors, partner agencies
- Stakeholders and users involved in company initiatives or projects, including remotely

The policy also applies to digital interactions, such as chats, emails, calls, collaborative platforms, etc.

3. Definitions

- **Discrimination:** Unjustified and disadvantageous treatment of an individual or group based on personal characteristics such as gender, age, ethnicity, disability, sexual orientation, religion, political opinions, socioeconomic status, or other protected factors. It can be direct (e.g., explicit exclusion) or indirect (e.g., seemingly neutral rules or practices that are discriminatory).
- **Harassment:** Any unwanted behavior — physical, verbal, non-verbal, or digital — that offends, humiliates, or makes another person uncomfortable, undermining their dignity. This includes offensive jokes, comments on appearance, unwanted physical contact, threats, insults, and repeated micro-aggressions.
- **Whistleblowing:** A voluntary and responsible act by which a person reports, even anonymously, facts or behaviors that violate laws, regulations, internal codes, or ethical principles. This may involve corruption, fraud, harassment, environmental violations,

accounting irregularities, etc.

4. Guiding Principles

Subbyx's corporate culture is based on fundamental values:

- **Dignity and Respect:** Everyone has the right to a peaceful, safe, and motivating environment. Offensive or degrading behavior is not tolerated.
- **Fairness:** Business decisions must be based on merit and transparency, without favoritism, bias, or conflicts of interest.
- **Active Inclusion:** Diversity is seen as an asset. Subbyx encourages equal participation regardless of personal or professional characteristics.
- **Zero Tolerance:** Any indication of misconduct is taken seriously and thoroughly investigated.
- **Shared Responsibility:** Everyone is responsible for the company climate and for preventing, recognizing, and addressing inappropriate situations.

5. Expected Behaviors

a. Respectful Relationships

- Use appropriate, non-sexist, non-aggressive language, including online
- Respect cultural, physical, linguistic, and identity differences
- Avoid personal comments about appearance, clothing, accent, etc.
- Encourage active listening and empathetic communication
- Do not isolate, ridicule, silence, or systematically ignore colleagues

b. Active Prevention

- Publicly condemn discriminatory jokes or behaviors
- Oppose hierarchical abuse, manipulation, and toxic behavior
- Reflect on how your actions affect others
- Intervene or report suspicious situations

c. Whistleblower Conduct

- Report in good faith, even based on reasonable suspicions
- Document facts: dates, locations, involved parties, evidence
- Maintain confidentiality of information and individuals involved
- Do not misuse reporting for personal revenge or manipulation

6. Reporting Channels

Reports can be submitted via:

- **Online form** (including anonymous submissions) available in the company handbook or Google Drive
- **External ANAC channel**, available if:
 - The internal channel is unavailable or not functioning
 - The internal report yields no results within the set timeframe
 - There is a risk of retaliation or immediate danger
- **Public disclosure or judicial report** in serious or urgent cases

7. Whistleblower Protection

- The whistleblower's identity is always confidential unless consent is given or required by law
- Information is handled in compliance with GDPR and protected from unauthorized access
- Whistleblowers are protected from any form of retaliation (e.g., dismissal, demotion, isolation, threats, reputational damage)
- **Facilitators** (e.g., colleagues or legal advisors assisting with the report) are also protected

8. Protection of the Reported Party

- The reported individual is presumed innocent until facts are verified
- They have the right to be heard, provide evidence, and defend themselves during investigations
- Their identity is protected as much as possible to prevent unjustified harm
- In cases of manifestly unfounded or malicious reports, the whistleblower may be subject to sanctions

9. Disciplinary Measures

If a report is confirmed, the company will apply sanctions proportional to the severity of the facts, which may include:

- Written or formal warnings
- Removal from projects or teams
- Suspension of benefits or bonuses
- Demotion
- Dismissal for just cause
- Contract termination with non-compliant third parties

All sanctions will be enforced in compliance with procedural safeguards and applicable collective agreements.

10. Training and Awareness

- All individuals collaborating with Subbyx must participate in mandatory training on ethics, inclusion, harassment prevention, and whistleblower protection.
- Training materials are kept up to date and are provided during onboarding.
- Effectiveness is monitored through anonymous feedback, audits, surveys, and annual updates.

11. Monitoring and Review

- The policy is reviewed annually or more frequently in response to regulatory changes.
- Report outcomes, actions taken, and training activities are compiled in aggregate form and included in the ESG report.
- Each update is communicated via internal email and published in the company documents section.
- Employees are engaged in continuous improvement through structured feedback and dialogue sessions.

Note: This policy complements and aligns with the company's Code of Ethics and the current legislation on whistleblower protection.