

**Data processing appointment  
relating to the management of Whistleblowing reports  
upon art. 29 of EU Regulation 679/2016 (GDPR)**

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LOMBARDINI Srl, with registered office in Reggio Emilia - Via Cav. Del Lavoro A. Lombardini n. 2, VAT number/Tax Code 02962900359,

**APPOINTS**

pursuant to Regulation (EU) 2016/679 and Legislative Decree 196/2003 and subsequent amendments.

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as Person in Charge of receiving and managing reports received from Whistleblowers and therefore Authorized to process all personal data received and collected in the context of reports of offenses relating to the actions of subjects acting for Lombardini S.r.l., according to the instructions listed below.

**OPERATING INSTRUCTIONS REGARDING THE TREATMENT**

In general, when processing personal data, the current regulatory provisions must be respected, with particular reference to the principles set out below:

- all data must be processed lawfully, correctly and transparently towards the interested party;
- the data must be collected and recorded for specific, explicit and legitimate purposes, and used in other processing operations in terms compatible with these purposes;
- the data must be accurate and updated;
- the data must be relevant, complete and not excessive in relation to the purposes for which they are collected or subsequently processed;
- upon receipt of the report, the identifying data of the reporting party will be kept confidential for the entire duration of the procedure aimed at ascertaining the validity of the report;
- the violation of the confidentiality obligations of the reporting person entails the violation of official duties with the consequent liability of the violating party;
- the transmission of the report to internal parties must always take place after eliminating all references that allow the identity of the person making the report to be traced;
- the data provided will be processed within the scope of and in compliance with the law, which provides for the guarantee of confidentiality and the possibility of using the data acquired exclusively for the purpose of exercising the functions falling within the competence of the recipient of the data and, if possible, of sharing them with the functions responsible for implementing prevention measures, including any disciplinary measures; the data in question is not otherwise ostensible;
- in the event that the report is founded, the authorized person will inform the competent body of the Company which will, alternatively or jointly, depending on the nature of the offence:

- o lodge a complaint with the competent judicial authority;
  - o take appropriate measures including any disciplinary action;
  - o or decide on the measures necessary to protect the Company.
- the subjects involved in the processing of the report must guarantee respect for the confidentiality and anonymity of the reporter, making every effort to ensure that those who have made the reports are not subject to retaliation, discrimination or in any case penalisation, direct or indirect, for reasons connected, directly or indirectly, to reporting, thus ensuring adequate confidentiality of such subjects;
- the data of the reporting party must be processed by the Authorized Person as well as by any subjects involved in the management of the report:
- o in compliance with confidentiality criteria;
  - o in a lawful and fair manner;
  - o in full compliance with the minimum security measures, safeguarding and controlling the data being processed in order to avoid risks, including accidental ones, of destruction, loss, unauthorized access or unauthorized processing;
- the report is excluded from access to documents pursuant to Law 241/1990 and subsequent amendments;
- the transmission of the report to individuals within the Company must always take place after eliminating all references that allow the identity of the person making the report to be traced;
- in the context of disciplinary proceedings, the identity of the reporting party can only be revealed
- o with the explicit consent of the reporting party;
  - o if the report is well founded and knowledge of the identity of the reporting party is absolutely necessary for the defense of the reported party;
- the anonymity of the reporting party cannot be enforced against the judicial authority; however, the report to the judicial authority must be made by highlighting that it was received from a person who is granted confidentiality protection;
- the data provided in favor of those who should exercise the rights referred to in the art. 7 of D.Lgs. no. 196/2003 and pursuant to articles from 15 to 22 of EU Reg. 2016/679, cannot contain data and/or information that allow us to trace the reporting subject;
- when the criminal liability of the reporting person for the crimes of defamation or slander or in any case for the same crimes committed with the report to the judicial or accounting authority or his civil liability, for the same title, in cases of fraud or gross negligence, the protections referred to in the D.Lgs. n. 24/2023 are not guaranteed and a disciplinary sanction is imposed on the person reporting, where the reporting person is an employee;
- whistleblower protection does not apply in the event of criminal liability (slander or defamation) or civil liability (unjust damage caused by fraud or negligence);
- the internal reports and the related documentation are kept by the Authorized Person for the time necessary to process the report and in any case no later than five years from the date of communication of the final outcome

of the reporting procedure or of the definition with an irrevocable provision of the proceeding originated from the report.

This Appointment will automatically expire upon termination of your role as Internal subject managing whistleblowing reports and any data in your possession relating to reports which have not yet been defined or whose data are still being stored must be transferred to another person in charge of managing reports, in compliance with the provisions of the Company's Whistleblowing Regulation and the specific instructions above and other further instructions received in the meantime from Lombardini S.r.l.

By signing this document, you accept the appointment and you undertake to proceed with the processing of personal data for which Lombardini S.r.l. is the Controller.

This Appointment integrates previous Appointments as person in charge of data processing and the instructions communicated previously.

Reggio Emilia, \_\_\_\_\_

The Data Controller company

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For acceptance:

Person in charge of processing

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