

## Whistleblowing rules

According to the Law on the Protection of Whistleblowers or Public Disclosers, (the State Gazette, No. 11 of 2.02.2023, effective 4.05.2023), Directive (EU) 2019/1937 of the European Parliament of 23.10.2019, and following the internal regulations of Kuminiano Fruit.

It is important for us to take immediate action in case of potential irregularities. All employees of Kuminiano Fruit such as external parties are encouraged to report possible irregularities.

Potential breaches may include:

- financial fraud offenses (corruption, embezzlement, money laundering)
- competition law infringements
- infringements concerning the safety of products offered on the domestic and international markets;
- an infringement of a general nature of which the whistleblower has become aware in the course of his or her work;
- infringements of labor law.

It is important to know that signals relating to infringements committed more than two years ago are not considered.

Reporting false information is subject to administrative liability.

At Kuminiano Fruit we have created an environment of trust between employees and managers.

We have different ways of reporting information about suspected irregularities:

- For verbal reports, in person or by calling 03117 / 2290 Monday - Friday, 8:00 am to 4:30 pm
- For written reports using a validated form, in a post box or by email: [ethics\\_compliance@santorelli.eu](mailto:ethics_compliance@santorelli.eu).

Download the form here: [link](#)

When submitting an alert, please leave the contact details of the whistleblower for subsequent communication, any questions, or feedback from our side.

We guarantee complete confidentiality to any person internal or external to the company who reports information about a breach. We guarantee confidentiality in the processing of the alert as well as the protection of personal data.

Kuminiano Fruit's policy is that bad faith reporting, whistleblowing, discrimination, or sanctions will not be tolerated.

Upon receipt of the alert, the whistleblower shall receive an acknowledgment of receipt and an alert identification number within seven days.

The next step includes: the alert will be examined and the necessary checks will be carried out. If the alert is substantiated, the investigation shall be assigned to the competent unit with a specific investigation order. The presumption of innocence shall apply as long as the investigating unit fails to prove an infringement.

The whistleblower shall receive feedback on the action planned or already taken at the latest within three months from the date of acknowledgment of receipt of the alert.