

Privacy Policy

WHISTLEBLOWING

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1. CONTACT DETAILS OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller of the personal data collected through and as part of the whistleblowing process, governed by the Whistleblowing Policy available *at the following link* <https://corp.orthofix.com/italy/about/compliance/>, is identified in Orthofix S.r.l., with registered office in Milan, via Vittor Pisani n. 16 (the "Data **Controller**" or " **Orthofix** ") pursuant to and in accordance with Regulation (EU) 2016/679 (the "**GDPR**").

The Owner has appointed a data protection officer (*data protection officer*), who can be contacted at the following mailbox: dpo@orthofix.it.

2. CATEGORIES OF DATA PROCESSED

The Data Controller will process personal data relating to the *whistleblower* (hereinafter also referred to as the "*whistleblower*"), the whistleblower and other protected parties (the "**Interested Parties**"), in order to carry out the necessary investigative activities aimed at verifying the merits of the fact being reported and the adoption of the consequent measures.

The data collected and processed include, but are not limited to, biographical data and contact details, in the event that the reporter decides not to remain anonymous, data related to the employment relationship, the function performed, or the elements characterizing the report also referring to additional persons involved or mentioned in the report.

In addition, if included in the report, and to the extent that such information is strictly necessary for the reporting process, special categories of data under Article 9 of the GDPR and judicial data under Article 10 of the GDPR may be processed.

3. DATA PROCESSING METHODS

The data provided as part of the report will be processed primarily with electronic and manual systems in accordance with the principles of fairness, loyalty and transparency provided for in the applicable data protection regulations and whistleblowing provisions, protecting the confidentiality of the person to whom the data refer and adopting technical and organizational security measures functional to ensure an adequate level of security (e.g., preventing access to unauthorized persons except in cases required by law, or the ability to restore access to the data in the event of physical or technical

incidents).

4. PURPOSE AND LEGAL BASIS FOR PROCESSING

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The data provided by the reporting party are processed by the Data Controller for the purpose of handling the report and carrying out the necessary investigative activities aimed at verifying the merits of the fact that is the subject of the report and the adoption of the consequent measures. In particular, the data will be processed for the following purposes:

- a) enable registration to the IT platform adopted by the Owner to facilitate the management of reports, while ensuring the highest standards to protect the confidentiality of the reporter and those involved in the report in various capacities;
- b) allow the whistleblower to make a report 1) either through a telephone line which, subject to the whistleblower's consent, will allow the transcription of the information provided 2) or through the platform made available by the Holder (through which it is also possible to request a face-to-face meeting with the Whistleblower Officer);
- c) allow the reporter to make an anonymous report, taking care to remove any reference that could identify the reporter even indirectly;
- d) Management and analysis of reporting carried out pursuant to Legislative Decree no. 24/2023, which implemented Directive (EU) 2019/1937 in Italy;
- e) Fulfillment of obligations under the law or EU regulations;
- f) defense or establishment of one's own right in civil, administrative or criminal litigation.

The legal basis for the processing referred to in (a)-(e) above is the fulfillment of a legal obligation to which the Controller is subject (Art. 6(1)(c) of the GDPR). The legal basis for the processing referred to in (f) above is the legitimate interest of the Controller (Art. 6(1)(f) of the GDPR).

The provision of data is necessary for the achievement of the above purposes; failure to provide, partial or inaccurate data may result in the inability to handle the report.

5. DATA REPORTING

For the pursuit of the purposes indicated, any personal data contained in the reports will be collected, processed and managed by the Whistleblowing Officer identified by Orthofix, in the local Compliance function as well as by any individuals who contribute to the proper execution of the Whistleblowing Policy, as identified in the same, and expressly authorized for processing or appointed as data processors *pursuant to* Article 28 of the GDPR. These individuals will be specifically identified by the Data Controller who will also provide adequate instructions on the methods and purposes of the processing and ensure that they are subject to obligations of confidentiality and privacy.

Moreover, by virtue of its preeminent role in the Holder's compliance system, Orthofix's Supervisory Board will be promptly informed of the receipt of any new report potentially relevant under the 231 Model adopted by the Holder; while the Group Chief Compliance Officer (unless the latter is himself the subject of the report or mentioned in it) may view the reports and support the investigation

Finally, the Controller may communicate, as long as it is necessary for the pursuit of the purposes of processing, the personal data collected to third parties belonging to the following categories:

- competent authorities (e.g., the ANAC and the judicial authority). These entities will act as autonomous data controllers;
- companies/entities/professionals/associations carrying out, by way of example, consulting activities, support for the provision of services etc., which will act, as the case may be, as autonomous data controllers, or as data processors on the basis of a specific agreement on the processing of personal data concluded pursuant to Article 28 of the GDPR.

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6. DATA TRANSFER

Personal data are processed by Orthofix and its suppliers within the European Union. If, as part of the processing purposes, personal data should be transferred outside the European Economic Area, such as where the Group Chief Compliance Officer is informed of the report, the Data Controller ensures that it adopts appropriate levels of protection and safeguards, including contractual safeguards, in accordance with applicable regulations, including reliance on European Commission adequacy decisions for countries that enjoy them, or the stipulation of contractual clauses.

7. DATA RETENTION

Reports and related documentation (including any recordings, if a recorded telephone line or other recorded voice messaging system is used for reporting) will be retained, in accordance with the principle of minimization, for as long as necessary to process the report and in any case no longer than 5 years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations provided for by the relevant legislation in force, except for the manifestation of specific needs aimed at the defense or protection of rights and/or legitimate interests of Orthofix or third parties, including in the event of complaints, litigation or pre-litigation. At the end of the retention period, the records will be deleted.

In the report file, personal data that are manifestly not relevant to the processing of a specific report will not be collected or, if accidentally collected, will be deleted without undue delay.

8. RIGHTS OF INTERESTED PARTIES

The Interested Party may exercise, in the cases expressly provided for by law and where applicable and subject to the limitations identified by the relevant provisions of law and, in particular, by Article *2-undecies* of Legislative Decree 196/2003, the rights provided for by the GDPR. In particular, the Data Subject has the right to:

- to obtain confirmation that your personal data is being processed and, if so, to request from the Data Controller access to information related to such processing (e.g., purposes, categories of data processed, recipients or categories of recipients of the data, the retention period, etc.);

- Request rectification of inaccurate or incomplete data;
- to ask the Data Controller for the deletion of data (e.g., *if* the personal data are no longer necessary with respect to the purposes for which they were collected, if the consent on which the processing is based is revoked, etc.);
- request restriction of processing (e.g., if the User disputes the accuracy of the data; if the processing is unlawful and the User objects to the deletion of the personal data; if the data are necessary for the exercise or defense in court of a right of the User, even if the data controller no longer needs them; if the User exercises the right to object, for the time necessary to verify the existence of legitimate reasons).
- receive in a commonly used, machine-readable format (e.g., pdf) personal data concerning him or her and to transmit it to another data controller, or to obtain direct transmission from one data controller to another, if technically feasible (so-called data portability).

The data subject also has the right to object in whole or in part, on legitimate grounds, to the processing of personal data concerning him or her.

These rights can be exercised directly by sending a notice to the following e-mail address privacy@orthofix.it.

Finally, if the data subject believes that the processing of the data provided violates data protection regulations, he or she has the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it).

9. COMMUNICATION AND PUBLICATION

This notice is communicated to interested parties by appropriate means of communication.

In particular, the disclosure is an integral part of Orthofix's Whistleblowing Policy and is communicated and disseminated in the same manner as the latter. The disclosure is also made visible within the information technology platform through which the report is made; it is also delivered to the whistleblower by the Whistleblowing Officer at the interview, if the report is made through this tool.

10. DOCUMENT UPDATE AND HISTORY

This policy is reviewed and updated at least annually.