



STANDARD PROCEDURE
Group

WHISTLEBLOWING REPORTS RECEIVED
(INCLUDING ANONYMOUSLY) BY SAIPEM SPA
AND BY ITS SUBSIDIARIES IN ITALY AND
ABROAD

Doc. No. STD_GR-GROUP-ANC-002-
E

Rev. 03

Date 27/03/2024

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STD_GR-GROUP-ANC-002-E

REFERENCE MSG
Anti-Corruption

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Revision Summary

Date	Revision	Prepared	Checked	Approved
29/12/2020	01	S. L. Rasini BINT	Regulatory System Technical Committee	S. Abrate RSBI
15/12/2022	02	T. Balzano ACMEM	Regulatory System Technical Committee	S. L. Rasini BINT
27/03/2024	03	A.M. Rossi COPLI	Regulatory System Technical Committee	O. Stella RISKO

Description of Revision 03

The impact of the revision may be deemed medium.

The modification of this document was required in order to transpose regulatory changes arising from the approval of Italian Legislative Decree 24/23 on the implementation of the European Directive on the protection of whistleblowers.


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1. INTRODUCTION

1.1 OBJECTIVES OF THE DOCUMENT

This Standard Procedure regulates the process of receiving, analysing and processing Whistleblowing Reports, whomsoever sends them, whether they be Third Parties or employees, even if sent anonymously or in confidence.

This Standard Procedure complies with obligations set forth in the Organisational, Management and Control Model Legislative Decree No. 231 of 2001 and Saipem SpA's Anti-Corruption Management System Guidelines (MSG).

1.2 AREA OF APPLICATION

This Standard Procedure applies to Saipem SpA and to all its Subsidiaries (hereinafter jointly referred as "Saipem").

This Standard Procedure is part of Saipem's Anti-Corruption regulatory documents as required by Saipem SpA's Anti-Corruption MSG.

Saipem shall also use its influence, insofar as this is reasonable based on the circumstances¹, to ensure that the companies and entities in which Saipem holds a minority share, meet the standards established by this Standard Procedure. They shall therefore adopt and maintain an adequate Internal Control System in accordance with the requirements established by Anti-Corruption Laws. In any case, the representatives appointed by Saipem in these companies and entities shall make every effort to ensure that the standards established by this Standard Procedure are adopted.

The management of Whistleblowing Reports and the related data processing for the purposes of privacy is performed by Saipem SpA, also in the interest of its Subsidiaries, in compliance with the provisions of applicable laws, including in particular, the principles of necessity, proportionality and lawfulness of the processing as provided in the Privacy Code, and, in line with the relevant provisions in the specific internal regulatory documents. The operational and management autonomy of Subsidiaries are complied with in all cases, ensuring the confidentiality requirements underlying the preliminary investigations, in compliance with the requirements imposed by the internal regulatory documents and the applicable laws.

If an addressee of this Standard Procedure has any doubts about the interpretation and/or application of the provisions of this document, they must contact the Compliance Function of Saipem SpA, which will suggest possible actions/solutions.


1.3 METHODS OF IMPLEMENTATION

This Standard Procedure is for immediate application for Saipem SpA.

Subsidiaries ensure timely start of the implementation process, in compliance with the "Regulatory System" MSG; implementation of this Standard Procedure must occur within a maximum of 90 days from its issue, by resolution of the Board of Directors (or in the absence thereof, of the corresponding body / function / role established by the governance of the Subsidiary).

All Subsidiaries must report to the Compliance Function, the date on which this Anti-Corruption regulatory document was implemented.

¹ Considering, in particular, the level of ownership by Saipem of the company or entity (e.g. Joint Venture, Consortia) and the laws and regulations governing business transactions in the country in which the company or entity is established and where its activities are based.
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1.4 REFERENCE DOCUMENTS

1.4.1 Internal References

- “Model 231 (includes the Code of Ethics)” of Saipem SpA or “Organisational, Management and Control Model (includes the Code of Ethics)” defined by the individual Subsidiaries (hereafter, both referred to as “Model”);
- “Anti-Corruption” Management System Guideline (Doc. No. MSGGR-GROUP-ANC-001-E);
- "Regulatory System" Management System Guideline (Doc. No. MSGGR-GROUP-RSM-001-E);
- “Internal Control System Over Financial Reporting” Management System Guideline (Doc. No. MSGGR-GROUP-ICF-001-E);
- “Privacy and data protection” Management System Guideline (Doc. No. MSGGR-GROUP-PRV-001-E);
- “Internal Control System and Risk Management” Management System Guideline (Doc. No. MSGGR-COR-ICR-001-E);
- “HSE” Management System Guideline (Doc. No. MSGGR-GROUP-HSE-001-E);
- “Investigating Alleged Unlawful Behaviour And Misconduct” Standard Procedure (Doc. No. STD_GR-GROUP-HR-LLD-002-E);
- “Information notice regarding the processing of personal data for the reporting of offences and for whistleblowing purposes in accordance with art. 13 of Regulation (UE) 2016/679 (“GDPR”).

1.4.2 External References

- Italian Legislative Decree No. 231/2001 “Regulations concerning the administrative responsibility of legal entities, companies and associations with or without legal personality, pursuant to article 11 of Law No. 300 of 29 September 2000”;
- The provisions of Legislative Decree 196/2003 (Privacy Code), as amended by Legislative Decree 101/2018 as well as by Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 concerning the "protection of individuals with regard to the processing of personal data and the free circulation of such data" (hereinafter "GDPR");
- International Standard ISO 37001: “Anti-bribery management systems”;
- Italian Law No. 179/2017 on “Provisions for the protection of those who report crimes or irregularities of which they may have become aware of in the context of their public or private employment”;
- Italian Legislative Decree (D.Lgs.) No. 24/2023 “Implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the protection of persons who report breaches of Union law laying down provisions concerning the protection of persons who report infringements of national legislation”

1.5 GENERAL PRINCIPLES

The persons involved in the activities regulated by this Standard Procedure operate in compliance with the regulatory, organisational and powers system. They shall also act in accordance with the law, applicable regulations and in compliance with the principles established below.

Traceability – the persons involved in the activities regulated by this Standard Procedure ensure - each within their own sphere of responsibility - that the activities and documents pertaining to the process remain traceable, by seeing to it that the respective sources, information and checks can be identified and

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reconstructed. Furthermore, all documents shall be archived and stored, in compliance with current applicable legislation, using dedicated information systems, whenever available.

Confidentiality – without prejudice to the transparency of the tasks performed and the obligations of disclosure imposed on applicable provisions, including those relating to the keeping and updating of lists of persons with access to privileged and significant information, all persons involved in the activities regulated by this Standard Procedure are under obligation to ensure the appropriate degree of confidentiality for all information that may come to their attention by virtue of their position.

Segregation of duties – in the activities regulated in this Standard Procedure, a segregation of duties and responsibilities must be provided, in order to prevent situations in which activities are concentrated on specific parties, which may contribute to creating conditions of risk with regard to the reliability of the information and the correct performance of duties. In dividing / assigning the activities, incompatible duties between and within the functions shall be segregated in accordance with the segregation principles prescribed by the internal control system applicable to the different entities. In practice, the principle is applied in relation to the nature of the activity concerned and the type and degree of risk associated with it, with a view to preventing the formation of unduly cumbersome organisational structures, especially in entities of moderate size.

Conflict of interest – The relationship of personnel involved in the activities regulated in this Standard Procedure with their counterparts shall aspire to the highest standards of ethical behaviour in compliance with the Saipem Code of Ethics. Every effort must therefore be made to avoid all situations and activities which could give rise to a conflict with the company's interests or which could interfere with a person's ability to take decisions impartially in the best interests of the company and in full observance of the principles and contents of the Code of Ethics and of the company's Model, the "Anti-Corruption" MSG and, in general, with the correct performance of their duties and responsibilities. Every situation that may constitute or determine a conflict of interest shall be reported and managed in accordance with the Code of Ethics and with the "Anti-Corruption" MSG.

Anti-Corruption policy – Saipem prohibits all forms of corruption, without exception. In particular, Saipem prohibits: (a) offering, promising, giving, paying, authorising anyone to give or pay, directly or indirectly, a financial or other benefit to a Public Official or private party (Active Bribe); (b) accepting, or authorising someone to accept, directly or indirectly, financial or other benefits or the requests or entreaties for financial or other benefits from a Public Official or private party (Passive Bribery), when the intention is: (i) to induce a Public Official or private party to perform improperly any function of a public nature or any activity connected with a business or to reward them for the improper performance of such a function or activity; (ii) to influence any official act (or failure to act) by a Public Official or any decision in violation of any his/her official duty; (iii) to obtain or secure an improper advantage in the conduct of business; or (iv) in any case, to violate the applicable laws. Prohibited conduct includes financial or other benefits offered to or received by Saipem Personnel (Direct Bribery) or by anyone acting on behalf of Saipem (Indirect Bribery) in connection with Saipem's business.

Transactions with related parties and parties of interest – Before finalising any transaction or amending the terms and conditions of a transaction that has already been approved, the functions involved in the tasks regulated by the Standard Procedure shall perform proper controls, check compliance with applicable procedures and guarantee the relevant information/notification requirements, according to the company's regulations on transactions with related parties and parties of interest, as defined therein.

Sustainability – Saipem is committed to creating value for all its stakeholders and to contributing to the sustainable development of the countries in which it operates. Saipem's commitment with its partners, contractors and customers to establish and strengthen mutual trust and cooperation includes encouraging the adoption of its principles of sustainability and good practices.

Maximising synergies – Saipem promotes cooperation at all levels and between all businesses through the integration of technical, technological and business know-how and the development of continuous synergies between businesses and processes.

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Market approach / orientation – the departments / functions involved in the activities regulated by this Standard Procedure shall plan and implement initiatives to disseminate correct and up-to-date information about Saipem and in particular about its industrial, economic and financial results to shareholders, investors and, more in general, to the financial community, complying with disclosure obligations imposed by current regulations, in accordance with the highest ethical standards, in compliance with the Code of Ethics and safeguarding Saipem’s reputation in the market.

Value creation / maximisation – all of Saipem’s activities shall be aimed at increasing, in the long term, the value of Saipem’s assets and of its managerial and technological skills and knowledge, as well as at creating value and welfare for all stakeholders.

Transparency – the persons engaged in the activities regulated by this Standard Procedure shall operate in such a way as to guarantee the utmost transparency in the performance of their duties and to provide full and truthful disclosure.

Continuous improvement – Saipem assures the continuous improvement of its processes through a suitable monitoring system. The functions shall promote the monitoring, development and dissemination of the know-how relating to the activities regulated by this Standard Procedure. In order to guarantee continuous improvement, performance must be monitored through suitable monitoring and reporting tools.

Satisfaction of customer departments / functions – The functions involved in the in the task governed by this Standard Procedure must enable the achievement of the required performance in terms of reliability, availability and fulfilment of the expectations of customer functions through cooperation and continuous alignment with them, in compliance with the expenditure limits defined by Saipem. Understanding the requirements and needs expressed, the constant monitoring of work performed, and feedback of the effectiveness of the services supplied are the main tools to allow maximisation of the satisfaction of the customer departments.

The specific principles with regard to the process of managing Whistleblowing Reports are as follows:

Internal Control and Risk Management System (SCIGR): “the SCIGR is all the rules, procedures and organisational structures aimed at allowing healthy and correct business practices in line with the objectives defined by the Board of Directors, by means of an adequate process for identifying, measuring, managing and monitoring major risks, as well as by means of suitable structuring of information flows aimed at guaranteeing the dissemination of information. This system is integrated into general organisational and company governance and is in line with relevant best practices. An effective SCIGR allows for decisions to be made with awareness and ensures the safeguarding of company assets, the efficiency and effectiveness of company processes, the reliability of financial reporting, and compliance with laws and regulations, the company's Articles of Association and internal regulatory instruments.”²


Independence and professionalism of the Internal Audit activities: The Internal Audit Function performs its activities ensuring that necessary independence conditions are maintained as well as the required objectivity, competence and professional diligence, as set forth in international standards for the practice of Internal Auditing and in the code of ethics issued by the Institute of Internal Auditors (IIA), as well as the Saipem Code of Ethics.

Obligation of presentation and transmission of the Whistleblowing Reports: Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management and the Third Parties and those who collaborate with have the obligation to:

- 1) promptly present reports of illicit conduct that they become aware of in the working context, through the communication channels provided for in this procedure, when they have concrete grounds to believe that, at the time of reporting, the information on the violations is founded (par. 2.1.1);
- 2) immediately, and in any case within 7 (seven) days of receipt, transmit to the Spot Audit and

² MSG “Internal Control System and Risk Management”

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Whistleblowing Function of Saipem SpA or the communication channels described in this procedure, any communication, information, news, fact or behaviour in any way arrived to the knowledge of Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management or of Third Parties concerning behaviours (of any nature, even merely omissive) referable to Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management or Third Parties put in violation (i) of the Code of Ethics, (ii) of laws or regulations or provisions of the authorities or internal regulations or otherwise suitable for causing damage or prejudice, even if only of image, to Saipem.

Guarantee of confidentiality and anonymity: all Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management or Third Parties who receive a Whistleblowing Report and/or are involved, in any capacity, in the preliminary investigation and processing of said Whistleblowing Report, are required to guarantee strict confidentiality on the persons and facts reported, to this end using criteria and methods of communication that are adequate to safeguarding the identity and integrity of the people mentioned in the Whistleblowing Reports, as well as the anonymity of the whistleblower, so that the person making the Whistleblowing Report is not subject to any form of retaliation or discrimination, in any case preventing notification of the acquired data to Third Parties that are not part of the preliminary investigation and processing of the Whistleblowing Reports regulated in this Saipem regulatory document. Notwithstanding this, the notification³ of such information by Spot Audit and Whistleblowing Function for preliminary investigation and processing of the Report, is allowed:

- to the following individuals/organizations:

- a) Whistleblowing Committee;
- b) Whistleblowing Team;
- c) General Counsel of Saipem SpA;
- d) Compliance Function;
- e) top-level positions of the areas of activity covered by the Report;
- f) organisational positions responsible for carrying out checks on the Report; and

- in cases where their knowledge is essential for the understanding of the facts reported and/or for the conduct of the corresponding preliminary investigations and/or processing;


Guaranteeing confidentiality, the Spot Audit&Whistleblowing Function ensures that the addressees of the Quarterly Report on Whistleblowing Reports (see par. 2.2), where different from those listed above, receive the anonymous Whistleblowing Reports.

Saipem also allows the possibility to submit anonymous whistleblowing reports which are therefore considered ordinary whistleblowing reports, where detailed.

Protection against Whistleblowing Reports done with Wilful Misconduct and Gross Negligence:

“Saipem wishes Saipem People, at every level, to cooperate in maintaining a climate of common respect for a person’s dignity, honour and reputation. *Saipem shall act to prevent offensive, discriminatory or abusive interpersonal behaviour.*”⁴ Therefore, when, also with a first instance ruling, the criminal liability of the

³ The communication flows ensure the principles of confidentiality of the person reported, the whistleblower, and generally all the persons and facts relating to the whistleblowing report. In any case the Spot Audit and Whistleblowing Function ensures the anonymisation of the persons and facts which may unambiguously refer to the report.

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whistleblower for offences of libel or slander or in any case for the same offences committed and reported to the judicial or accounting authorities, or their civil liability for the same offence, in cases of wilful misconduct or gross negligence, is ascertained, the protections envisaged for the whistleblower are not guaranteed and the relevant functions will issue disciplinary measures to the whistleblower.

Protection of the whistleblower from threats or acts of retaliation or discriminatory: it is forbidden to carry out any acts of Retaliation that cause or could cause, directly or indirectly, unfair harm to the Whistleblower These protection measures apply to Saipem personnel and third parties, as well as:

- Facilitators;
- persons in the same working context as the Whistleblower, and linked thereto by a stable relationship or kinship up to the fourth degree;
- work colleagues of the Whistleblower, working in the same working context and who have a current and habitual relationship with them
- entities owned by the whistleblower
- entities in which the whistleblower works
- entities working in the same working context as the whistleblower.

2. DESCRIPTION OF ACTIVITIES

2.1 OPERATING METHODS

The process of managing Whistleblowing Reports is described in the following paragraphs.

2.1.1 Receipt

Saipem, in order to facilitate the receipt of Whistleblowing Reports⁵, has the following exclusive communication channels⁶ and, in particular:

Whistleblowing Reports in written form:

- regular mail⁷ (address: Saipem SpA, Spot Audit and Whistleblowing Function, Via Luigi Russolo 5, 20138 Milan (MI), Italy;
- e-mail address⁸:
 - WhistleBlowing@saipem.com;
 - Dedicated channel of the Compliance Committee: organismodivigilanza@saipem.com.
- communication tools on the Saipem Group website.


For ordinary post, in order to ensure the protection of the Whistleblower, it is suggested to forward the report in three envelopes: the first (external) will contain the other two and will bear the wording “CONFIDENTIAL”; the second (intermediate) – where possible – will give the data of the whistleblower; the third (internal) will contain the whistleblowing report.

⁵ See paragraph 4 “Definitions” for the definition of whistleblowing report

⁶ Consistently with the provisions of Italian Legislative Decree No. 24/2023, it is specified that Saipem has involved the relevant trade unions for information concerning the adopted whistleblowing channels.

⁷ for international company sites that do not have widespread access to IT workstations, the Company has also defined alternative tools for gathering reports (e.g., so called Yellow-Box mail box) defined by the human resources and/or HSEQ and/or relevant Compliance functions.

⁸All reporting channels are guaranteed confidentiality, assessing the security requirements in accordance with the CR_GR-GROUP-HR-SEC-009 (security by design) criteria

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Alternative tools are also provided for the collecting of the reports (e.g. dedicated post boxes, so-called Yellow-Boxes) made available by the human resources and/or competent HSEQ and/or Compliance functions⁹, for international company offices that do not permit widespread access to computerised work stations.

Whistleblowing Reports in oral form

Reports may be made orally in the following methods:

- through the voice-mail box at the number +39 02 442 53012 made available by the Spot Audit and Whistleblowing Function;
- direct meetings with the Spot Audit and Whistleblowing Function. In this case, the meeting will be minuted and a copy of the minutes are given to and undersigned by the whistleblower.

For reports made through the above-described channels, the Spot Audit and Whistleblowing Function will inform the whistleblower of the acknowledgement of the report within seven days following receipt.

The Spot Audit and Whistleblowing Function has the possibility to contact the Whistleblower to acquire any other useful information/elements for the investigation, to ensure all due follow-up.

Where possible, the Spot Audit and Whistleblowing Function ensures¹⁰ feedback to the Whistleblower within three months following the date of receipt of the report or, if such notice is not received¹¹, within three months following the term of seven days following the submission of the whistleblowing report.

To ensure the correct evaluation of the reported facts, it is suggested to detail the Whistleblowing reports are much as possible, by:

- indicating the details and other elements useful for identifying the person to whom the Whistleblowing Report is addressed;
- indicating the time and place in which the reported fact occurred;
- describing the fact and, where possible, how they became aware of the matter;
- where possible, attach documents in which it is possible to identify objective facts confirming the report.

All reports received by the Compliance Committee or supervisory body must also be forwarded to the Spot Audit & Whistleblowing Function, which will launch the investigation as described (Par. 2.1.2.1).

It is forbidden to establish new Whistleblowing Report receiving channels without the preliminary opinion of the Internal Audit and Compliance Functions.

The preparation and maintenance of the above mentioned communication channels¹² is guaranteed by the Internal Audit Function. With the exception of the “dedicated channels” created in compliance with Model 231 (Paragraph 3.2.3).

Saipem Personnel, the directors, statutory auditors, members of the control and supervisory bodies, management and Third Parties receiving a Whistleblowing Report from outside the channels provided shall promptly forward, and in any case no later than 7 (seven) days, the original and any attachments to the Spot Audit and Whistleblowing Function in accordance with the highest standards of confidentiality and with appropriate procedures to protect the whistleblower and the identity and integrity of the individuals reported, without prejudice to the effectiveness of subsequent investigation.

⁹ Whistleblowing reports received via the yellow box must be promptly forwarded by the relevant HR and/or HSEQ functions to the Spot Audit&Whistleblowing Function

¹⁰ Where the whistleblower can be contacted by e-mail

¹¹ where there are justified and grounded reasons, for example, if there are technical difficulties in accessing the e-mail account, the Spot Audit and Whistleblowing Function will be bound to ensure the traceability of such reasons.

¹² With the exception of the yellow boxes set up by the compliance committee of foreign subsidiaries.

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2.1.2 Investigation

The Spot Audit and Whistleblowing Function will ensure that all the appropriate investigations are carried out on the facts outlined in the Whistleblowing Reports received, by doing one or more of the following activities and guaranteeing that these phases are carried out as quickly as possible and in accordance with the principles of objectivity, competence and professional diligence.

2.1.2.1 Preliminary investigation

The objective of the preliminary investigation is to proceed with the classification of the communications received in order to identify the Whistleblowing Reports to be treated in the application of this regulatory document, as well as assess the presence of the conditions necessary for starting the subsequent investigation phase.

The preliminary investigations related to facts reported for which on-going investigations by public authorities are known to exist, (such as judicial authority, ordinary and special, administrative bodies and independent authority vested with powers of supervision and control) as well as sending audit reports to said authorities which are subject to prior assessment by the General Counsel of Saipem SpA who will evaluate the appropriate actions to take.


The **Spot Audit and Whistleblowing** Function, if required with the support of the relevant corporate functions:

- a) updates the “System for management, monitoring and presentation of the Whistleblowing Reports”¹³ at the receipt of a communication received through the communication channels referred to in par. 2.1.1
- b) sends the Whistleblowing Team all the communications received and summons the Whistleblowing Team preparing the supporting information elements for the performance of the functions attributed to it.

The **Whistleblowing Team**:

- c) examines the communications received (appropriately anonymised) to identify the Whistleblowing Reports that fall within the area of application of this regulatory document. At the end of this phase the Spot Audit and Whistleblowing Function sends the communications that are not identified as Whistleblowing Reports to the relevant company functions for processing based on applicable legislative provisions;
- d) classifies Whistleblowing Reports as SCIGR Whistleblowing Reports or AM Whistleblowing Reports, on the basis of their contents;
- e) identifies, among the Whistleblowing Reports, those classified as Verifiable Detailed Whistleblowing Reports and Unverifiable Detailed Whistleblowing Reports and Non-Detailed Whistleblowing Reports
- f) may ask the Spot Audit and Whistleblowing Function, whenever it deems it useful for the integration of preliminary investigations, for the matters of their responsibility, to conduct checks also through the company structures involved or the personnel concerned, or, if necessary, also hearing third parties, or, request from the Whistleblower (where possible) clarifications, documents or useful information for the Whistleblowing Report;
- g) proposes the dismissal of Whistleblowing Reports that: (i) do not qualify as Detailed Whistleblowing

¹³In this phase the Spot Audit and Whistleblowing Function will register the original communication using the specific electronic protocol (see the following par. 5 "Document monitoring, storage and traceability").

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Reports (ii) are clearly unfounded (iii) contain facts already covered in past specific preliminary investigations, that are already archived by Saipem's Board of Statutory Auditors, where from the preliminary investigations conducted no new information was revealed that requires additional verification; (iv) Unverifiable Detailed Whistleblowing Reports that are therefore not deemed necessary to begin the investigation phase referred to in par. 2.1.2.2, indicating the reasons and considering sending them to the departments involved, together with, if appropriate, recommendations on possible steps to be taken; (v) the Verifiable Detailed Whistleblowing Reports for which, in light of the results of preliminary tests conducted in accordance with letter f) above, do not consider starting the next investigation phase referred to in par. 2.1.2.2. to be necessary.

Regarding Verifiable Detailed Whistleblowing Reports remaining after point g) above, the **Spot Audit and Whistleblowing** Function:

- h) forwards the AM Whistleblowing Reports to the Compliance Committees¹⁴ established in Saipem SpA and the Subsidiaries that, based on their contents, are responsible even as Guarantors of the Code of Ethics, for their preliminary investigations, evaluation and processing; these (in compliance with applicable provisions of the Organization, Management and Control Model and the Code of Ethics), promote proper verification, evaluate the corresponding results and give information to the Spot Audit and Whistleblowing Function regarding the results of the activities, including the definition, sharing and monitoring of corrective actions, as well as successful dismissal of the Reports themselves, within 3 (three) months of receipt of the Whistleblowing Report; the Saipem SpA Compliance Committee assigns the file to the HR Compliance Function for the appropriate verifications.
- i) updates the "System for management, monitoring and presentation of reports" with the information contained in the "Whistleblowing report files".

In the case of Whistleblowing Reports with a Potentially Serious Impact, the Spot Audit and Whistleblowing Function shall promptly inform the Whistleblowing Committee, the Whistleblowing Team, the Board of Statutory Auditors of Saipem SpA and, where pertinent, the Compliance Committee of Saipem SpA, so that it may consider the possibility of convening a special meeting. Furthermore, at the first possible meeting, the Spot Audit and Whistleblowing Function will inform the Board of Statutory Auditors of Saipem SpA and, where pertinent, the Compliance Committee of Saipem SpA of the Whistleblowing Report, the results after initial checks and the scope of the checks to be performed. Where pertinent, these bodies may request the Spot Audit & Whistleblowing Function to perform further investigations.

In the case of Whistleblowing Reports with a Potentially Serious Impact, the Board of Statutory Auditors of Saipem SpA assesses the need to promptly inform the Audit and Risk Committee of Saipem SpA.

In case of Whistleblowing Reports with a Potentially Serious Impact that refer to a Subsidiary, the Spot Audit and Whistleblowing Function, after evaluation performed by the Whistleblowing Committee, of the existence of any conflicts of interest, will inform the relevant Board of Statutory Auditors of Saipem SpA, if present, and the Compliance Committee.

2.1.2.2 Investigation

The objective of the investigation of the Whistleblowing Reports is to proceed with checking, analysing and evaluating in detail the reliability of the facts reported as well as formulating possible recommendations for adopting necessary corrective measures for the areas/company processes involved by the Whistleblowing Report, on the basis of which the managers will prepare a specific action plan.

¹⁴ In the investigations they are involved in, the Supervisory Bodies/Compliance Committees ensure compliance with the principles of confidentiality of the person reported, the whistleblower and, generally, all persons and facts relating to the whistleblowing report.

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The Spot Audit and Whistleblowing Function will ensure that necessary checks are performed: (i) directly collecting the information necessary for the evaluations from the company structures concerned, or (ii) through the relevant Saipem functions, after the evaluation of the existence of any conflicts of interest, as well for the Subsidiaries, or (iii) through the involvement of HSE function if the Whistleblowing Reports contain HSE issues¹⁵, or (iv) through the involvement of Health Function if the Report contains medical-health related issues¹⁶. In case of ii), iii) and iv) the responsible structures shall promote and coordinate proper checks, also relying on the relevant functions/offices, sending the Spot Audit and Whistleblowing Function a final report with supporting documentation. In the event that the competent functions involved in the report do not guarantee independent judgement, the checks will be carried out by the Spot Audit and Whistleblowing Function, also in the case of Reports concerning Other Subjects.

During the investigation, the Saipem Internal Audit manager assesses, after the opening of the Whistleblowing Report File, the possibility to activate a “spot” audit¹⁷ taking into account the principles and the methods of implementation governed by the regulatory framework in relation to Internal Audit Activities¹⁸ and reporting to the Chairman, the Chief Executive Officer and General Manager, Control Bodies of Saipem SpA and to the relevant Compliance Committees.

In case of “spot” audits, the findings relating to the report and the related outcomes are contained in a dedicated audit report, which is an integral part of the Whistleblowing Report File.

2.1.2.3 Dismissal

At the end of the investigations, the Spot Audit and Whistleblowing Function:

- prepares and transmits the dismissal proposal of the Whistleblowing Reports to the Whistleblowing Team and in the case of the Whistleblowing Reports with a Potentially Serious Impact, also to the Whistleblowing Committee, who may:
 - approve the dismissal of the Quarterly Whistleblowing Report¹⁹ to be submitted for approval to Saipem's Board of Statutory Auditors; or
 - request further investigation/information²⁰.

Having obtained the positive opinion of the Whistleblowing Team and for Whistleblowing Reports with a Potentially Serious Impact, also of the Whistleblowing Committee, the Spot Audit and Whistleblowing Function:

- provides feedback to the Whistleblower, also in oral form, regarding the Whistleblowing Report received, within three months following the date of receipt of the report or, if such notice is not received²¹, within three months following the term of seven days following the submission of the whistleblowing report
- informs the Whistleblowing Committee of the proposed dismissal with a summary of those classified as Founded, Partially Founded and Unfounded with actions. The Whistleblowing Committee reserves the right to request detailed information at any time in relation to the remaining Whistleblowing Reports

¹⁵ Health, safety, environment and public health issues (please see the “HSE” Management System Guideline)

¹⁶ Medical-health issues (please see the “Human Resources, Organisation and Services” Management System Guideline”)


¹⁷ The Spot Audit and Whistleblowing function will initiate checks on the content of whistleblowing reports through audits beginning with: i) checking if an audit is planned or already in effect for the area affected by the report; ii) if no audit is planned or in effect, then a spot audit will be launched or, if there is time, an audit will be added to the following year's schedule; iii) if an audit is planned or in effect, evaluate the possibility of including the analysis of the report's content in the audit, taking into consideration the pertinence of those contents with the audit and the number/weight of the reports to be reviewed.

¹⁸ “Internal Audit Charter”, approved by the Board of Directors of Saipem SpA on 16 May 2019.

¹⁹ Flows regarding the “Quarterly Whistleblowing Report” are described in detail in paragraph 6 (Violation Reports) of this document.

²⁰ Once any further investigations are concluded the flow picks up again at paragraph 2.1.2.2.

²¹ where there are justified and grounded reasons, for example, if there are technical difficulties in accessing the e-mail account, the Spot Audit and Whistleblowing Function will be bound to ensure the traceability of such reasons.

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(the activities of which ended with an Unfounded outcome), available in the files of the Internal Audit Function (see par. 5)

- and includes them in the Quarterly Whistleblowing Report, including any “spot” audit reports, for information to the Board of Statutory Auditors of Saipem SpA.

The Board of Statutory Auditors of Saipem SpA is informed of the dismissal contained in the Report, or, if necessary, will requests the Spot Audit and Whistleblowing Function to carry out further investigations.

Saipem SpA's Board of Statutory Auditors, during its review of the Quarterly Whistleblowing Report, will evaluate whether to send to the Audit and Risk Committee any Whistleblowing files, including any "spot" audit reports, considered relevant for their impact on the Internal Control and Risk Management System.

The Quarterly Whistleblowing Report, only for the Whistleblowing Report files relevant to Saipem SpA, is submitted for approval to Saipem SpA's Compliance Committee, who, for “matters concerning company administrative responsibility under the Italian Legislative Decree 231/01”, may where appropriate request the Spot Audit and Whistleblowing Function to carry out further investigations, in-depth analyses, verifications, before the final filing.

2.1.3 Monitoring corrective measures

If the investigative phases reveal the need for corrective actions on the Internal Control and Risk Management System²², it is the responsibility of the audited functions/process managers to draw up a corrective action plan for the removal of the detected critical issues. The Internal Audit Function will monitor the status of their implementation.

2.2 REPORTING

The Spot Audit and Whistleblowing Function ensures the preparation of a Whistleblowing Quarterly Report and the related summary document. After the review by the Board of Statutory Auditors of Saipem SpA, and, as far as it is concerned, by the Compliance Committee of Saipem SpA, the Spot Audit and Whistleblowing Function sends the Quarterly Whistleblowing Report²³:

- to the Chairman of the Board of Directors of Saipem SpA;
- to the Chief Executive Officer and General Manager of Saipem SpA;
- to the Chief Financial Officer of Saipem SpA;
- to the Independent Auditors of Saipem SpA;
- to the members of the Whistleblowing Committee;
- to the members of the Whistleblowing Team;
- to the Compliance Function;

and for pertinent Whistleblowing Reports, to:

- the Compliance Committee of Saipem SpA;
- to the Top Management of each subsidiary involved as well as the relevant Control Bodies and Compliance Committee²⁴ of each subsidiary, after evaluation of the existence of any conflicts of

²² Please note that corrective measures following whistleblowing reports, in addition to improving the internal control system, may include managerial/disciplinary measures taken against employees and/or managerial measures taken against third parties.

²³ The Report ensures the principles of confidentiality of the person reported and the whistleblower.

²⁴ This report is given as a contribution to their control and supervisory duties by said Bodies. Checks performed by Saipem SpA's Internal Audit do not change the prerogatives and autonomy of the Control Bodies and Compliance Committees for the relevant companies as per

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interest.

2.3 EXTERNAL WHISTLEBLOWING REPORTS

Saipem Personnel, Third Parties and, in any case, all addressees may submit a Whistleblowing Report in the methods defined in this Standard Procedure, and have the possibility to make an External Whistleblowing Report only in one of the following conditions:

- Saipem has not established internal whistleblowing channels as governed by this Standard Procedure or, where active, these do not comply with the provisions of the local regulations in force;
- the whistleblower has already made an internal report in the operating methods described in this Standard Procedure which has not received any follow-up;
- the whistleblower has reasonable grounds to believe that, if he/she made an internal report, it would not be followed up effectively or that the same report could lead to the risk of retaliation;
- the whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

In Italy, external whistleblowing reports are managed by the National Anti-Corruption Authority (ANAC) in the methods governed by the authority through specific channels.

3. ROLES AND RESPONSIBILITIES

Internal Audit Function - Saipem SpA Function responsible for independently reviewing and assessing the internal control system, ensures the preparation and maintenance of dedicated information channels, checks that Saipem functions, departments, Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management and Third Parties involved in activities described in this procedure act in compliance with its provisions.

Spot Audit and Whistleblowing Function - Saipem SpA function reporting directly to the Internal Audit Function, identified in the Company as a specific, independent department with suitably trained personnel assuring the establishment, management and maintenance of the whistleblowing channels as specified in this procedure. In particular, for the purpose of this procedure, the Spot Audit and Whistleblowing Function receives the Whistleblowing Reports and ensures that the reported facts are all appropriately investigated, guaranteeing appropriate Audit activities, monitoring the state of implementation of any corrective actions and making available the related reports.

Compliance Function - Saipem SpA Function in charge of assuring the administrative/corporate social responsibility and compliance with Anti-corruption regulations/policies, monitoring the referred regulatory and legal developments and coordinating the communication and training activities. In particular, for the purpose of this procedure, it assures the relevant evaluation of SCIGR Whistleblowing Reports with reference to the above-mentioned matters.

HR Compliance Function - Saipem SpA Function which, for the purpose of this procedure, is appointed by the Saipem SpA Compliance Committee to investigate AM whistleblowing reports and assess any disciplinary actions in relation to both AM and SCIGR whistleblowing reports, ensuring the related reporting.

Health, Safety and Environment Function (HSE) – Saipem SpA Function which, for the purposes of this procedure, in support of the Internal Audit Function, is responsible for the investigation of Whistleblowing

company regulations and as per the law. For issues regarding "company administrative responsibility under Italian Legislative Decree 231/2001", as described in par. 3.3 of Model 231 "the Compliance Committees of the subsidiaries, where necessary, may engage external resources for the checks" as it deems fit and in compliance with the "autonomous powers of initiative and control" deriving from Art. 6 paragraph 1 sub-paragraph. b) of Italian Legislative Decree 231/2001.

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Reports regarding HSE issues, promoting and coordinating the most appropriate checks to confirm whether there is any basis to the events reported.

Health Function - Saipem SpA Function which, for the purposes of this procedure, in support of the Internal Audit Function, is responsible for the verification of Whistleblowing Reports regarding health and occupational medicine issues, promoting and coordinating the most appropriate checks to confirm whether there is any basis to the events reported.

All the above-listed Functions receive appropriate, constantly updated and specific professional training, aiming to increase their specialist skills to ensure the correct management for Whistleblowing Reports, also in relation to personal data protection and data and information security regulations.

4. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

The terms defined in the Anti-Corruption MSG have the same meanings in this Standard Procedure. In addition, the following terms are defined as follows:

Saipem's Board of Statutory Auditors

The Board of Statutory Auditors of Saipem SpA.

Whistleblowing Committee

A cross-functional internal body, with an own internal regulation, vested with the tasks and roles more fully described in par. 2.1.2 and 7 and consisting of the Function Managers of Saipem SpA: (i) General Counsel, (ii) People, HSEQ and Sustainability, (iii) Internal Audit, (iv) Integrated Risk Management and Compliance and (v) Accounting and Administration.

Working context

Past or present work and professional activities performed within employment relationships²⁵, through which, regardless of the type of these activities, a person acquires information on the violations.

Facilitator

Person assisting a whistleblower in the reporting process, working in the same working context and whose assistance must remain confidential.


Control and Compliance Bodies

The Board of Statutory Auditors and the Compliance Committee referred to in Article 6 of the Legislative Decree No. 231 issued in 2001, instituted in Saipem SpA and its Subsidiaries in Italy or, the Audit and Risk Committee/Compliance Committee instituted in the foreign Subsidiaries.

Saipem Personnel

Resources who, regardless of the type of contract, perform their activities within the company, even without remuneration and only for learning purposes, including personnel on outsourcing contracts,

²⁵ Including the selection period prior to recruitment

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apprentices, interns, trainees, school and university students, employees of external company holding direct relations with the company.

Quarterly Whistleblowing Report

Includes all SCIGR/AM Whistleblowing Reports received in the relevant quarter as well as the Whistleblowing Report folders proposed for dismissal regarding Saipem SpA and its Subsidiaries and the list of Whistleblowing Reports in progress from previous quarters.

Feedback

Information provided to the Whistleblower relating to the follow-up given or intended for the whistleblowing report.

Retaliation

Any behaviour, act or omission, even where only attempted or threatened, adopted in relation to the whistleblowing report, the report to the Judicial or accounting authorities or public disclosure which actually or potentially causes direct or indirect unfair harm to the Whistleblower or reporter.

Whistleblowing Report/s

Any communication, information, news, fact or behaviour in any case received by Saipem Personnel, trainees, personnel during a probationary period, candidates of a selection process²⁶, directors, statutory auditors, members of the control and supervisory bodies, management, shareholders or Third Parties, also following the dissolution of any legal relations, if the information on the violations was acquired during these relations, concerning the conduct (of any kind, even merely omissions) of Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management or Third Parties in violation (i) of the Code of Ethics, (ii) national or EU regulatory provisions harming the public interest of integrity of the public administration or Saipem they have become aware of in the working context²⁷, (iii) any laws or regulations or provisions of the authority or internal regulations or in any case those that may cause damage or prejudice to Saipem, even if only to its public image. For the purpose of their treatment

²⁶ If they have acquired information on the violations during the selection process or in other pre-contractual negotiation phases

²⁷ In particular, the infringements of national legislation category includes: (i) predicate offences for the application of the 231 Decree; (ii) violations of the Organization and Management Models provided for in the 231 Decree. On the other hand, for Violations of European legislation, refer to the Attachment in Italian Legislative Decree 24/2023. These include: so-called environmental offences; fraud, corruption and any illegal activity related to EU expenditure; acts or conduct that nullify the purposes of the provisions of the European Union indicated in the Attachment

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and preliminary investigation, the Whistleblowing Reports are divided into:

- **SCIGR Whistleblowing Reports** - Whistleblowing Reports regarding Internal Control and Risk Management System: these are, for the effective maintenance of Saipem's internal control and risk management system, all Whistleblowing Reports relating to non-compliance with laws and external regulations and rules included in Saipem's internal regulatory system, including cases of fraud against the company's assets and/or in corporate reporting as well as events that, at least theoretically, may result in administrative liability under Italian Legislative Decree No. 231/2001 of 2001. The deficiencies identified and documented by the company structures within the internal operating controls and those of Saipem's Control System on financial reporting are not SCIGR reports;
- **AM Whistleblowing Reports** - Whistleblowing Reports regarding Other Issues in Violation of the Code of Ethics: these are all Whistleblowing Reports related to the violation of rules and principles contained in the Code of Ethics (for example, issues relating to business ethics, mobbing practices, harassment), which do not also result in SCIGR Whistleblowing Reports.

Therefore, for the purpose of this Standard Procedure, reports referring any of the matters defined below are not considered Whistleblowing Reports: (i) a personal interest of the whistleblower (for example, labour disputes, personal conflicts among colleagues); (ii) issues of national defence and security; (iii) violations already governed mandatorily through specific external channels.

Anonymous Whistleblowing Reports

Any Whistleblowing Report that comes from an individual whose personal details are unknown or not clearly identifiable; where subsequently identified, anonymous whistleblowers receive the same protection measures ensured by this Standard Procedure against retaliation, in the same way as

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non-anonymous Whistleblowing reports.

External Whistleblowing Reports

Written or oral communication of information on violations, submitted through the external whistleblowing channel, in Italy activated by the National Anti-Corruption Authority (ANAC).

Detailed Whistleblowing Report/s

Whistleblowing Report in which the narrative of the author, the facts, events or circumstances which constitute the basic elements of the alleged offence (e.g., type of offence committed, period when it occurred, value, causes and purposes of the offence, company/areas/persons/departments/entities involved, anomaly on the internal control system, etc.) is given with a level of detail sufficient to allow, at least theoretically, the relevant Company bodies to identify useful or relevant criteria for verifying the reliability of said Report. The Detailed Whistleblowing Reports are in turn divided into:

- Verifiable Detailed Whistleblowing Reports: if, given the contents of the Detailed Whistleblowing Report, it is possible, on the basis of the available investigative tools, to verify the accuracy of the Whistleblowing Report;
- Unverifiable Detailed Whistleblowing Reports: if, given the detailed contents of the Detailed Whistleblowing Report, it is not possible, on the basis of the available investigative tools, to verify the accuracy of the Whistleblowing Report and, therefore, proceed to the investigation phase referred to in par. 2.1.2.2.

Whistleblowing Report/s with a potentially serious impact

Whistleblowing Report:

- for which would entail a quantitatively and qualitatively significant impact (that involve accounting, external auditing, internal control over financial reporting) on the financial statement for Saipem SpA and/or its Subsidiaries. The impact is significant from a quantitative perspective if it is equal to or greater than 20% of the "materiality threshold" defined by the "Saipem Internal Control System on Financial Reporting" Management System Guideline with reference to the Saipem SpA's consolidated financial statement of the previous year. The impact is significant from a qualitative perspective if the

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Whistleblowing Report can influence financial and investment decisions of potential addressees of financial reporting;

and/or

- concerns members of the corporate bodies of Saipem, the Chairman of the Board of Directors, the Chief Executive Officer and General Manager, the Chief Financial Officer and the senior executives reporting directly to the Chief Executive Officer and General Manager of Saipem SpA and/or the Chairman and/or the Board of Directors of Saipem SpA;

and/or

- that one or more members of the "Whistleblowing Committee" (within the framework of reports submitted to it by the Whistleblowing Team) believes it may have a significant impact on the Internal Control and Risk Management System.

Whistleblowing Team

A cross-functional internal body, with an own internal regulation, vested with the tasks and roles more fully described in par. 2.1.2 and 7 and composed by one direct report of the following Function Managers: General Counsel, Internal Audit, Accounting and Administration (Internal Control System over Financial Reporting Responsibility), Integrated Risk Management and Compliance and People, HSEQ and Sustainability (HR Compliance responsibilities) of Saipem SpA.


Third Parties

External parties that are in a business relationship with Saipem (e.g. Business Partners, clients, contractors, independent auditors of Saipem, consultants, associates and, in general, stakeholders²⁸).

Top Management

The top level of management in a company with executive powers (Chief Executive Officer, Managing Director, General Manager, or equivalent body prescribed by the Articles of Association of a company).

²⁸ Including shareholders and persons holding administrative, management, control, supervision or representation functions.
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5. DOCUMENT MONITORING, STORAGE AND TRACEABILITY

The Internal Audit Function shall examine and assess, on the basis of methodologies and responsibilities aimed at guaranteeing independence from the management of the process, the adequacy of the internal control system to guard the present Standard Procedure on the basis of its Annual Audit Plan, approved by Saipem SpA's Board of Directors.

All the departments and functions involved in the activities falling under this regulatory document shall ensure the traceability of the information, each for the parts under its responsibility and using pertinent IT systems, and are responsible for filing and storing all documents produced, whether on paper or in electronic format, so that every step in the process may be properly tracked.

In order to ensure management and traceability of Whistleblowing Reports and their investigations, the Internal Audit Function provides and updates the "System for management, monitoring and presentation of Whistleblowing Reports", in which the Whistleblowing Report files are recorded, ensuring that all related support documentation is archived.

For that purpose, the Internal Audit Function guarantees that original report documentation is filed and stored in specially provided paper/electronic archives with the highest security/confidentiality levels used by Saipem, in accordance with the applicable legislation.

Specifically, in the case of whistleblowing reports in oral form:

- if the report is made via a recorded telephone line or other recorded messaging system, the Whistleblowing Report, with the consent of the whistleblower, is documented by the Spot Audit and Whistleblowing Function by recording the message on a suitable storage and reproduction device or by fully transcribing the message. Where transcribed, the whistleblower has the right to check, correct or confirm the contents of the transcription by undersigning it;
- in the cases in which, at the request of the whistleblower, the whistleblowing report is made orally during a meeting with the Spot Audit and Whistleblowing Function, with the consent of the whistleblower, it is documented by the Spot Audit and Whistleblowing Function by recording it on a suitable storage and reproduction device or is minuted. Where minuted, the whistleblower can check, correct and confirm the minutes of the meeting, undersigning them.

The original, hard copy and/or electronic documentation shall be archived and preserved for the time needed to process the whistleblowing report and in any case for no more than five years from the date of notification of the final outcome of the whistleblowing procedure.

The worksheets related to investigations and to the audits arising from Whistleblowing Reports are archived in the Internal Audit Function archive.


6. VIOLATION REPORTS

Any suspected or known violation of Anti-Corruption Laws or of this Standard Procedure shall be reported immediately in one or more of the following ways:

- to the employee's direct superior - or to the primary contact in Saipem of the business partner (e.g. vendors, consultants, partners of joint ventures) when the report of the violation comes from the business partner;
- to the Compliance Committee or other equivalent company body, in compliance with the Model;
- to the Manager charged with preparing the Company's Financial Reports of Saipem SpA;
- to the Compliance Function;
- and, in any case, through the dedicated channels indicated in this document that regulates the reports, including anonymous ones, received by Saipem at par. 2.1.1.

The direct superior, the Compliance Function and the competent Human Resources function shall consult to

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identify the best way to proceed, including the possible enforcement of appropriate disciplinary measures.

7. DISCIPLINARY MEASURES

Saipem will sanction any illegal conduct attributable to Saipem Personnel that emerges as a result of the verification of Whistleblowing Reports carried out according to this regulatory document.

With reference to the application of this regulatory document, in the event that, from the results of the preliminary investigation phase:

- alleged unlawful or irregular behaviour by one or more Saipem employees emerges, or
- the breach of the confidentiality obligations of the whistleblower's identity and the contents of the report or the performance of retaliation or discriminatory acts against the whistleblower, as well as other subjects indicated as deserving of protection by Legislative Decree 24/2023, is highlighted;

The Whistleblowing Team informs the Whistleblowing Committee.

The Whistleblowing Committee (i) submits the results of the audits, indicating the subjects and the related responsibilities, to the competent HR Compliance function pursuant to Saipem regulatory documents on the assessment of alleged unlawful and irregular conduct, (ii) monitors the implementation of any measures adopted and (iii) ensures that the subjects and/or companies reported are promptly informed. The Spot Audit and Whistleblowing Function periodically receives from the competent HR Compliance function the assessments performed in this regard.

Saipem shall take suitable disciplinary measures towards employees, managers, directors and members of the Board of Statutory auditors in accordance with the provisions of the Model and the collective labour agreement or other applicable national laws who: (i) as a result of the investigation of Whistleblowing Reports, are responsible for violating Anti-Corruption laws, the Anti-Corruption MSG and/or other internal or external regulations relevant to the SCIGR Whistleblowing Reports and/or AM Whistleblowing Reports, (ii) act in a manner that is contrary to this standard procedure and/or (iii) intentionally fail to detect or report any breaches or threats or take reprisals against others who report violations. Disciplinary action will be proportionate to the extent and severity of the misconduct found and may go as far as termination of employment.

8. DISTRIBUTION AND ADOPTION


This regulatory document must be distributed to all those concerned.

For this purpose, subject to the forms of distribution and adoption of the document in accordance with the "Regulatory System" MSG, the same is sent to:

- each member of the Board of Directors, Board of Statutory Auditors and Compliance Committee, also as Guarantor of the Code of Ethics, of Saipem SpA, by the managers of the respective Secretariats;
- each member of the Board of Directors, Board of Statutory Auditors and Compliance Committee, also as Guarantor of the Code of Ethics, of the individual Subsidiaries, by the managers of the respective Secretariats, if existing, or by their Top Management;
- each Saipem employee, through the company tools for the distribution of procedures and posting in the spaces reserved for company communications.

This Standard Procedure is published on the Intranet and Internet sites of Saipem SpA and its Subsidiaries. Furthermore, each subsidiary shall translate this regulatory document in the local language in order to ensure the best distribution and understanding of the document, (in line with the provisions of the "Anti-Corruption" MSG).

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	WHISTLEBLOWING REPORTS RECEIVED (INCLUDING ANONYMOUSLY) BY SAIPEM SPA AND BY ITS SUBSIDIARIES IN ITALY AND ABROAD	Rev. 03	Date 27/03/2024
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The above-mentioned subjects will ensure, where pertinent, the updating of delivery or circulation of this regulatory document in case of personnel changes and/or changes in company structure.

The Human Resources Functions of Saipem SpA and of Subsidiaries will ensure, where pertinent, distribution of this regulatory document to new hires.

Furthermore, Saipem SpA and each Subsidiary and the managers of the operational sites shall ensure the posting of Attachment A - Poster in places visible to Saipem Personnel, directors, statutory auditors, members of the control and supervisory bodies, management or Third Parties and the translation in the same local language in order to ensure the best distribution and understanding of the document.

9. ATTACHMENTS

The following attachments are integral parts of this Standard Procedure:

Attachment A: Poster

ATTACHMENT A

POSTER

Do you have a Whistleblowing Report that you would like to forward to Saipem?

Who can report? Anyone: workers, suppliers, contractors, customers, members of local communities, etc.

What you can report: any fact that could damage the reputation and respectability of Saipem and its partners, including the conduct of Saipem Personnel or Saipem's stakeholders, that violates the Saipem Code of Ethics, laws or internal regulations or which in any case may damage or harm, even only the image of Saipem.

How: through one of the following channels:

- regular mail: Saipem SpA, Internal Audit Function, Via Luigi Russolo 5, 20138 Milan (MI), Italy;
- e-mail address:
 - WhistleBlowing@saipem.com;
 - Dedicated channel of the Compliance Committee: organismodivigilanza@saipem.com.
- on the Saipem Group website;
- in company sites without widespread access to IT stations, the relevant [**Human Resources and/or HSEQ or Compliance to be established on a case-by-case basis**] ensure the presence of alternative tools to collect whistleblowing reports (e.g. "yellow-boxes")
- through the voice-mail box at the number +39 02 442 53012 made available by the Spot Audit and Whistleblowing function;
- through a direct meeting with the Spot Audit and Whistleblowing Function, appointed by Saipem to diligently follow-up the reports received.

You can also do it anonymously: Saipem will guarantee you maximum confidentiality and anonymity

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What does Saipem do once the report has been received? A group of Saipem professionals works on the reports in order to verify the information contained therein and take the most appropriate measures (adoption of prevention, mitigation, sanctioning measures, etc.)

Protection of the whistleblower from threats or acts of retaliation or discrimination: it is forbidden to carry out threats or acts of retaliation or discrimination, direct or indirect, against the whistleblower for reasons connected, directly or indirectly, to the Whistleblowing Report

For further information on the management of the report, read the Standard Procedure on "Whistleblowing Reports received (including anonymously) by Saipem SpA and by its Subsidiaries in Italy and abroad" (STD_GR-GROUP-ANC-002), while for the processing of personal data read the "Information notice regarding the processing of personal data for the reporting of offences and for whistleblowing purposes", both also available on the website www.saipem.com