

## Bracco's Speak Up program (extract)

If something doesn't feel right, follow your instincts. **Speak Up! We're Listening.**

You can report your concerns in a confidential or anonymous way through the **Bracco's Speak Up channels** available 365 days a year, 24 hours a day, 7 days a week in all the Countries in which we operate either via:

✚ **Via web:** <https://bracco.ethicspoint.com>

✚ **By phone** with a dedicated number available in the countries listed below:

Country	Line Type	Number
US	Domestic	1-833-222-4196
Switzerland	OneConnect-TF	8332268013
France	OneConnect-TF	0800 90 54 96
Germany	OneConnect-TF	0800 182 1218
China	OneConnect-TF	400 120 0257
Italy (includes San Marino, Vatican City)	OneConnect-TF	800 819572

The Bracco's Speak Up website includes an **"Ask Questions"** button which will allow you to ask questions related to Bracco's Code of Ethics, Compliance Programs and Procedures, external laws, regulations, and applicable Industry Codes.

You can direct your question to either Corporate Internal Audit or to your Local Compliance contact. You are also welcome to submit questions confidentially.

### RESPONSIBILITIES

The Group Companies have identified the **Corporate Internal Audit Director** of Bracco S.p.A. as the **Report Manager** who can involve, in compliance with the principles of confidentiality and restricted sharing of Reports, the **Risk Operational & Compliance Audit Manager** of Bracco S.p.A.

In some Companies has been identified a **Local Report Manager**. So, in these cases the Whistleblower can decide - directly on the web platform - who will take charge of his/her Report, i.e. whether the **Report Manager (Corporate Internal Audit Director)** or the **Local Report Manager**.

In any case, if a **Report is received by a different person**, the latter must forward it to the **Report Manager within 7 (seven) days**, through the **Bracco Speak Up Hotline**, without prejudice to the confidentiality obligations.

### GENERAL PRINCIPLES

It should be noted that:

- only substantiated Reports that are conscientiously and reasonably believed to be **true and well-founded** should be made.
- A **bona fide Reporter is protected against any form of retaliation**. Group companies shall **not tolerate threats, retaliation and/or discrimination against anyone who makes a Report in good faith**, nor shall any action or sanction be taken against anyone who reports in good faith facts that, upon subsequent verification, prove to be unfounded.
- at each stage of the process, the **identity of the Reporter**, the **Reported Person**, the facilitator (if any), the **content of the Report** and its documentation are kept **confidential**, except with the explicit consent of the Reporter.

- all Reports are processed in full respect of the principles of **objectivity and impartiality**. **No action will be taken against a Reported Person solely on the basis of the allegation made by the Reporter**, without objective evidence and **without verifying the facts that are the subject matter of the Report**.
- Although the Group encourages the Reporter to disclose his or her identity to facilitate the verification of the merits of a Report, the **full processing of Reports**, even anonymous ones, is guaranteed, provided they are **properly substantiated**.
- Access to the **Bracco Speak Up Hotline** is subject to the “no-log” policy in order to prevent the identification of Reporters who wish to remain anonymous: this means that the **Company’s IT systems are not able to identify the portal access point (IP address)** even if access comes from a computer connected to the Company network.
- In accordance with applicable law, each Company reserves the right to take **appropriate action against** anyone who:
  - **violates Reporter protection measures and the confidentiality obligations** associated with a Report;
  - **makes false and/or unfounded Reports in bad faith** in order to defame, slander, or otherwise harm the Reporter;
  - as a Reported Person, is held responsible for the facts reported.
- Upon receipt of a Report through the platform, initial feedback will be provided to the **Reporter within 7 days** and, **within 3 months at most, final feedback** will be provided regarding the end of the investigation and its outcome (except in exceptional cases, which are communicated to the Reporter).
- The Report Manager, the Contact Person, the local Compliance Officer, and all the persons in any capacity involved in handling the Report guarantee the respect of the principles of autonomy, impartiality, and independence during the entire process.

**N.B.** Failure to use the **Bracco Speak Up Hotline does not provide** the Reporter with the guarantees of proper processing that are provided instead when using the internal reporting channels.

**In the case of unfounded Reports or made in bad faith for the sole purpose of discrediting one or more persons or Bracco Departments**, the **Report Manager (Corporate Internal Audit Director)** and/or the **Local Report Manager** will inform the competent Departments in order to assess a **disciplinary procedure against the Reporter in bad faith** and all other measures deemed appropriate, including - where applicable - reporting the matter to the competent Authority.

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