

1. PURPOSE

The purpose of this procedure is to outline the ethical reporting system for irregularities at Adare Pharmaceuticals srl (hereinafter referred to as “Adare”), implemented in accordance with Legislative Decree 24/2023, as well as the terms under which received reports are processed.

Legislative Decree No. 24, dated 10 March 2023 and published in the Official Gazette on 15 March 2023, implements Directive (EU) 2019/1937, which concerns the protection of individuals who report breaches of European Union law (commonly referred to as the Whistleblowing Directive).

More specifically, Legislative Decree 24/23 regulates the procedures for reporting breaches of national or EU regulations that harm public interest or compromise the integrity of public administration or private entities.

Adare falls within the scope of the legislation, as it has reported an average of at least 50 employees with permanent or fixed-term employment contracts over the past year.

Accordingly, Adare has implemented a reporting system in compliance with Legislative Decree 24/2023, which enables the submission, receipt, analysis, and management of reports, including anonymous ones. The necessary documentation has been prepared to clearly outline the procedures for submitting and managing reports, as described in this document.

The utmost confidentiality is assured regarding the individuals and facts reported, as well as the identity of the reporters, to ensure that individuals who submit a report are not subject to any form of retaliation.

2. SCOPE OF APPLICATION

This procedure applies to Adare, which manages its correct and consistent implementation, as well as its comprehensive internal and external dissemination.

It is applied in response to Legislative Decree 24/2023. Refer to Section 10 for details on the applicable legislation.

3. RELATED DOCUMENTS

Current Code of Conduct

4. SOURCE DOCUMENTS

NA

5. GLOSSARY AND DEFINITIONS

Term	Definition
Work Context	Current or past work or professional activities undertaken by Adare personnel or third parties within the legal relationships they have established with Adare.
Public Disclosure	Making information about violations publicly available through the press, electronic media, or other means capable of reaching a large audience.
Supervisory Body	Specifically trained individual(s) entrusted with the management of the internal Reporting channel.
Facilitator	A person who assists the Reporter in the Reporting process, operates within the same work context, and whose assistance must remain confidential.
Information on Violations	Adequately substantiated information, including reasonable suspicions, concerning violations resulting from behaviours, acts, or omissions committed or likely to be committed based on concrete elements. This also includes elements related to conduct, including omissions, intended to conceal such violations. Information about violations obtained within the context of a legal relationship, whether ongoing or concluded, is also included, provided this information was acquired in the work context, including during the probation period or selection/pre-contractual phase.
Involved Person	An individual or legal entity mentioned in the Report, submitted through either an internal or external channel, complaint, or public disclosure, as a party involved in the violation.
Whistleblowing Platform (Platform)	The IT tool adopted for the submission and management of internal whistleblowing reports, accessible via Adare's official website.
Reporter	A person who submits a Report through the internal (Platform) or external Reporting channel, complaint, or public disclosure.
Reported Person	An individual or legal entity mentioned in the Report, submitted through either an internal or external channel, complaint, or public disclosure, as the subject to whom the violation is attributed or otherwise related.
Report	A written or oral communication of information relating to Adare concerning violations of laws, regulations, the Code of Conduct, or the system of rules and procedures in place within the company; including breaches of national and international law.
External Report	A written or oral communication of information regarding violations, submitted by the Reporter through the external Reporting channel established by the National Anti-Corruption Authority (ANAC).
Internal Report	A written or oral communication of information on violations, submitted by the Reporter through the internal channel.
Disciplinary Authority	The body which, following the investigations conducted by the Supervisory Body, receives indications regarding the validity of the Report and decides on the appropriate actions to be taken.

6. RESPONSABILITY

6.1. Supervisory Body

The Supervisory Body is responsible for the proper execution of this procedure within the scope of its duties. Specifically, it must ensure:

- Compliance with Legislative Decree 24/2023, within its area of responsibility
- Adherence to the procedural flow outlined below for managing the Report
- Confidentiality of the Reporter and the subject of the Report.

6.2. System Administrator

System Administrators are responsible for the proper management of the Platform within the scope of their duties. Specifically, they must ensure:

- proper assignment of access and profiles for the Supervisory Body, and for internal or external parties to Adare who may be involved by the Supervisory Body in handling the Reports;
- notification to the platform provider of any malfunctions and/or modification needs.

7. SECURITY

NA

8. PROCEDURE

8.1. Adare's Internal Reporting Channel

Adare has implemented an internal reporting channel through an encrypted platform, accessible at the following link:

EthicsPoint - Adare Pharmaceuticals, Inc.

Access to the platform is available continuously, 24 hours a day, 7 days a week.

The platform is encrypted and guarantees the utmost confidentiality for the Reporter.

It is managed from an IT perspective by dedicated System Administrators.

The Reporter, through the Platform, can submit:

- **A Written Report.** The following information is required:
 - o The country where the reporter is located
 - o The country where the violation took place

- o The address of the company site where the violation occurred
- o The type of report the reporter wishes to make (e.g., conflict of interest, embezzlement, fraud, misappropriation, environment, health and safety, antitrust and unfair competition, extortion or corruption, tax evasion, financial misrepresentation and corporate crimes, privacy and confidential information, money laundering, self-laundering and financing of terrorism, transport security, information security)
- o Relationship with the company
- o Reporter's identity information: the reporter may choose to remain anonymous or provide their name, phone number, and email address along with their preferred contact time if opting to disclose their identity
- o Identity and role of the person(s) reported
- o Potential involvement of a supervisor, manager, or senior management
- o A description of the reported incident: a general description of the facts suffices at this stage; further details will be requested later
- o Where the incident occurred: if it did not occur in a specific place, it may be observed in a document, business transaction, or otherwise
- o When the incident occurred and its presumed duration
- o How the reporter became aware of the facts
- o Any other persons involved or aware of the incident
- o Information, details, and/or evidence relevant to the report, including locations, witnesses, and any additional information useful for assessing and resolving the situation
- o Any documents to attach.

At the end of the report submission, the platform automatically generates a report code and prompts the Reporter to enter a password linked to the report's identifying code. The Reporter must retain these details to access the platform later to amend, complete, or monitor the progress of the report. In all cases, to follow up on a report, the Reporter must access adarepharma.ethicspoint.com or call the toll-free number 1-844-591-7987.

- **A Voice Report.** By calling 800-172-444 and, after the English recorded message, dialling 844-591-7987, an Italian-speaking operator will guide the reporter through the reporting process. Pressing 1 allows the submission of a new report. At this point, a Navex Global

operator will respond, tasked with handling voice reports. The information to be provided in the voice message is the same as in the written report section above. After the report is entered into the Platform, the Reporter will receive a report code. The Reporter should record this code and password and keep them secure. 5-6 working days after the report, the Reporter can follow the previous steps, pressing 2 and entering the report identification code and password to check the status of the report and view responses or additional questions. It is noted that Navex Global does not have access to the Reporter's phone number to ensure anonymity if the Reporter chooses to remain anonymous.

For both written and voice reports, the Platform allows for:

- o Anonymous Reports;
- o Reports with Identity.

Anonymous reports are managed in the same way as reports where identity is provided. Adare encourages providing Reporter details to facilitate investigations, given the company's protective procedures to safeguard the Reporter.

- **An In-Person Report**, by directly contacting the Supervisory Body. Upon receiving the in-person report, the Supervisory Body must promptly, and in any case within 7 days of receipt, enter it into the platform described above, recording the Reporter's details, the specific content of the report as provided by the Reporter, and any supporting documentation, which should then be destroyed. The Managing Entity must also notify the Reporter of the entry into the platform. They are required to maintain confidentiality regarding the Reporter's identity, the people involved and/or mentioned in the report, the report's content, and related documentation. After the report is entered into the Platform, the Reporter will receive a report identification code.

In all cases, the Reporter must keep the report code and password secure to access the platform later, allowing them to amend, complete, or monitor the report's progress.

8.2. The Supervisory Body Appointed by Adare

Adare has appointed an External Supervisory Body.

In managing the reports, the Supervisory Body ensures:

- **impartiality:** The Supervisory Body guarantees a fair management of reports, free from internal or external influences that could compromise objectivity. It will not be subject to any

influence or bias regarding the parties involved in the reports.

- **Independence:** The Supervisory Body guarantees an objective and impartial analysis of the Report, as it operates autonomously, free from influence by management or any other company department.

The activities of the Supervisory Body are regulated by a specific contract and a formal appointment as the Data Protection Officer.

8.2.1. How the Supervisory Body Operates

The Supervisory Body accesses reports through a dedicated platform that requires the input of non-transferable personal user ID and password.

The Supervisory Body must:

- Issue an acknowledgement of receipt to the Reporter **within 7 days** of receiving the Report.
- Maintain communication with the Reporter and, if necessary, request further details. Specifically, during the investigation, the Supervisory Body may:
 - o Initiate a dialogue with the Reporter, asking for clarifications, documents, and additional information, either through the dedicated channel on the IT platform or in person.
 - o Obtain, if necessary, records and documents from other internal and/or external departments of the company, with support from these entities.
 - o Engage third parties through interviews and other requests, always taking care not to compromise the confidentiality of both the Reporter and the Reported Person.
- Diligently follow up on the reports received, taking necessary actions to assess:
 - o The validity of the reported facts;
 - o The outcome of the investigations;
 - o Any measures taken.
- Provide feedback on the Report **within 3 months** from the date of receipt acknowledgement. With reference to the feedback to be provided within this three-month period, it is noted that this feedback may consist of:
 - o A notice of dismissal of the Report as it does not fall under the scope of Legislative Decree 24/2023;
 - o The initiation of an internal investigation and potentially its findings;

- o The measures adopted to address the issue raised;
- o Referral to a competent authority for further investigation.

In the case of an anonymous Report, the Supervisory Body has the right to request the Reporter to disclose their identity if this information is essential to the investigation process. The Supervisory Body will handle such information in compliance with the requirements of the applicable legislation.

8.3. Phases of the Report Management Process

8.3.1. Submission and Registration of the Report

All reports submitted on the platform are summarised in a dashboard, allowing the Supervisory Body to monitor reports based on various criteria: priority, source of receipt, date of creation, level, type of report, and the status of the report management process (Unreviewed, In Progress, Closed).

Upon receiving a Report, the Supervisory Body will review the Report and access the necessary details to manage it. The Supervisory Body will then update the status of the Report from “Unreviewed” to “In Progress.”

8.3.2. Classification and Preliminary Analysis of the Report

The Supervisory Body, adhering to the timelines outlined above, conducts an initial assessment of the Report’s content to identify those that potentially fall within the scope of this procedure and:

- Issues an acknowledgement of receipt to the Reporter within 7 days of receiving the Report;
- Maintains communication with the Reporter and may request additional information if necessary;
- Diligently follows up on the received reports by initiating and managing the investigative phase.

This response does not imply any evaluation of the report’s content by the Supervisory Body but is solely intended to inform the Reporter that the Report has been received correctly.

The preliminary analysis aims to verify that the Reporter is an authorised individual to submit the Report and that the subject matter falls within the scope of the whistleblowing policy.

If the report concerns a matter outside the scope of whistleblowing legislation, it will not be considered or processed as a whistleblowing report. The Supervisory Body may close it or, if the information is precise, consistent, and adequately substantiated, forward it to the relevant persons or bodies for further consideration and to initiate inquiries/investigations to verify the reported issues. In such a case, the Supervisory Body will inform the Reporter that the report is inadmissible under whistleblowing regulations and that it will be archived or analysed as another type of Report.

Once the report's processability is confirmed, the Supervisory Body assesses its admissibility.

Accordingly, the Report should clearly indicate:

- The time and place circumstances where the reported event occurred, including a description of the reported facts, detailing the circumstantial information, and where possible, how the Reporter became aware of the facts;
- The identification or other details allowing the identification of the subject responsible for the reported facts.

Based on these guidelines, the report may be deemed inadmissible due to:

- Lack of essential data that constitutes the core elements of the report;
- Evident lack of grounds in the facts associated with legislatively defined violations;
- Description of facts that are too generic to allow comprehension;
- Submission of only documentation without a specific report of violations.

If the report is inadmissible, the Supervisory Body will close the report, ensuring the reasons for doing so are tracked and providing this information to the Reporter.

After the preliminary analysis, the Supervisory Body determines the outcome of the report:

- Substantial: proceeding to the next investigative phase; or
- Closure if the report is:
 - o "Frivolous," meaning it does not meet the criteria for reportable issues under Legislative Decree 24/2023 or is evidently unfounded;
 - o Contains "insufficient information," meaning it is too generic or lacks adequate substantiation;

- o “Unmotivated,” meaning “substantiated and verifiable”; based on preliminary findings from verified data and information, no evidence emerges to support the initiation of further investigation;
- o “Non-verifiable,” meaning “substantiated but unverifiable”: based on preliminary findings, it is not possible, given the available information and tools, to conduct further investigations to verify the Report’s validity.

To obtain further information, the Supervisory Body may:

- Request additional details through formal summons and interviews with the Reporter (if non-anonymous), the Reported Person, and/or any other individuals involved in or informed about the reported events. These individuals may also be asked to provide explanatory notes or documents.
- Seek support from internal personnel within the company.
- Engage, if deemed appropriate, external experts or consultants.

In these last two cases, the Supervisory Body may include in the application the names of individuals who will contribute to information gathering and may participate in the report management process. All information related to the report will always be handled within the application to ensure compliance with relevant legislation.

If the report does not include identifying information for the Reporter (anonymous report), the Supervisory Body will treat it as a whistleblowing report and proceed with further inquiries only if the information is precise, consistent, and adequately substantiated. In any case, anonymous reports must be duly tracked and archived.

8.3.3. Investigative Phase

Once the admissibility of the report is verified, the Supervisory Body initiates the investigative phase to assess its validity. This process is conducted with impartiality and confidentiality, performing any activities deemed necessary, including interviewing the Reporter and/or other individuals who may provide useful information on the reported facts, as well as collecting relevant documentation and/or information.

The objectives of the investigative phase are as follows:

- To carry out, within the limits of the tools available to the Supervisory Body, in-depth and

specific analyses to verify the reasonable grounds of the reported factual circumstances;

- To reconstruct the management and decision-making processes followed, based on the documentation and evidence provided;
- To offer guidance on implementing any necessary corrective actions to address potential control deficiencies, anomalies, or irregularities identified within the examined areas and business processes.

During the investigation, the Supervisory Body may request additional information or clarifications from the Reporter. Moreover, if deemed useful for the investigation, it may gather information from individuals involved in the Report, who also have the right to request to be heard or to submit written statements or documents. In such cases, and to ensure the right of defence, the involved person is notified of the Report's existence, while maintaining confidentiality about the identity of the Reporter and other individuals involved or mentioned in the Report. With respect to personal data (pertaining to an identified or identifiable individual), the Supervisory Body will collect only the data strictly necessary for processing the specific report.

To manage the investigative phase, the Supervisory Body may assign the Report to one of the individuals already present on the Navex platform, who is tasked with monitoring the system and will assist in managing the investigation.

Furthermore, the Supervisory Body may seek support from internal or external personnel who can aid in gathering information, verifying, and handling the Report. The involvement of these individuals is managed within the application, and the person involved in the process will receive an email with login credentials to access the platform.

The company is responsible for making internal personnel or external parties (e.g., consulting firms, lawyers) available to the Supervisory Body, selecting individuals with relevant expertise based on the type of report, and informing them of their role in handling the Report. It is the responsibility of the Data Controller to designate internal personnel involved in handling the Report as Data Processors and to appoint external parties involved as Data Controllers.

The investigative activities may utilise, without limitation:

- Company data/documents relevant to the investigation (e.g., extracts from corporate systems and/or other specific systems used);
- External databases (e.g., databases containing company information);
- Open sources (e.g., social media, websites, publications, newspapers, and other public sources);
- Documentary evidence obtained from company structures;

- Statements provided by the individuals concerned or obtained during recorded interviews, as appropriate.

All investigative activities and their outcomes must be adequately documented, with particular reference to the decisions made; all documentation gathered during the investigation phase and communication exchanges with the Reporter are recorded exclusively on the Platform implemented as the internal channel.

The Platform allows tracking of the investigation's progress and attachment of documents, reports, and recordings.

The Supervisory Body is not responsible for determining individual liability of any nature or for conducting legal or substantive reviews of actions and measures taken by the entity/administration subject to the report, as this would encroach on the responsibilities of designated individuals within each entity or administration, or those of the judiciary.

8.3.4. Decision-Making Phase

Following the investigative activities, the Supervisory Body:

- Orders the archiving of the Report with appropriate justification if it finds evidence of clear and manifest unfoundedness;
- Forwards the documentation to the disciplinary authority for verification of the reported facts if it finds evidence supporting the validity of the reported matter;
- Communicates the final outcome of the Report to the Reporter.

8.3.5. Documentation Archiving and Retention

The Report is archived and stored on the designated platform to enable reconstruction of the different stages of the process, ensuring confidentiality and protection of the personal data of both the Reporter and the Reported Person. The documentation is retained for five years from the date of communication of the final outcome of the reporting procedure. In the case of judicial litigation, personal data is retained for the duration of the proceedings, until all appeal actions have been exhausted.

8.3.6. Reporting

At the conclusion of the investigation, the findings are communicated to Adare's Board of Directors

and the Sole Statutory Auditor.

Any decision-making measures associated with the report, identified in line with Adare's Disciplinary System, are submitted to the Board of Directors, potentially with the support of the Human Resources function.

Reports submitted with the intent to harm or prejudice the Reported Person, as well as any other forms of misuse of this Procedure, may lead to accountability, including disciplinary action, particularly where it is established that the report is unfounded and that accusations, criticisms, or allegations were made with malicious or wilful intent.

This document does not affect the criminal and disciplinary liability of the Reporter in cases of slander or defamation under current legal provisions.

8.3.7. Corrective Actions: Monitoring

If analyses of the examined company areas and processes reveal the need to recommend appropriate remedial actions, it is the responsibility of the management of the areas/processes under review to define a corrective action plan to address identified issues and ensure its implementation within the timeframes established by the relevant Directorate and/or Disciplinary Authority.

8.4. How Adare Ensures Protections for the Reporter

To protect the Reporter and the reporting process, the Supervisory Body and all individuals/entities within or outside the company involved in handling the Report are subject to confidentiality obligations, meaning that reports cannot be disclosed to third parties.

The Supervisory Body and all individuals/entities within or outside the company involved in handling the Report are authorised by the Data Controller to process personal and sensitive data related to the Report.

For more details, please refer to Section 8.8.

8.5. Code of Conduct for the Reporter

The Reporter is required to:

- Submit the Report using the platform implemented by Adare. The Supervisory Body will not consider reports received outside the platform;
- Make the Report in good faith, refraining from offensive language and personal insults or moral judgments intended to harm or demean the personal and/or professional honour or reputation

of the individual(s) to whom the reported facts are attributed. If the reported facts are found to be unfounded and/or without merit following evaluation and investigation, the Reporter who acted in good faith will not face repercussions. Any unfounded reports submitted with the intent to harm a third party or the company will result in the loss of protections afforded to the Reporter under the legislation (including protection from retaliation) and may expose the Reporter to disciplinary action. Additionally, in cases where civil liability for defamation or slander is established due to wilful misconduct or gross negligence, the Reporter may face an administrative penalty ranging from €500 to €2,500;

- Use the platform to submit any documents supporting the Report;
- Retain the Report identification code and password to access the platform later to amend, complete, or monitor the progress of the Report;
- Periodically access the platform to check if the Supervisory Body has requested additional information;
- Access the platform using personal, not company, devices;
- After submitting the Report, wait for the timelines specified in Legislative Decree 24/2023 before submitting additional requests. Specifically, the Supervisory Body has:
 - o 7 days from the date of receipt to issue an acknowledgement of the Report;
 - o 3 months from the date of acknowledgement to provide feedback on the Report.

During this period, the Reporter should not use external reporting channels.

For anonymous reports, the following guidelines are important to consider:

- Avoid using a company PC or device connected to the company's network/intranet;
- Provide as much data and information as possible;
- Include all relevant information needed to verify the Report;
- Regularly check the Report's status and communicate with the Supervisory Body, responding to any questions.

It is noted that anonymous reports will be considered only if they are sufficiently substantiated and include all elements necessary for the investigation.

Furthermore, the Supervisory Body reserves the right not to proceed with anonymous reports that lack substantiation, which will be deemed inadmissible and therefore archived. It is also noted that in the case of anonymous reporting, the company cannot guarantee all protections provided by

Legislative Decree 24/2023; however, if the anonymous Reporter is later identified, they may then benefit from the full protections under Legislative Decree 24/2023.

If an anonymous report is submitted, the Reporter has the discretion to disclose their identity if the Supervisory Body specifically requests it. However, if the Reporter chooses to remain anonymous, the Supervisory Body may be unable to proceed with the report and may close it as a “substantiated but unverifiable” report.

8.6. Information and Training

To ensure the effective implementation of the Whistleblowing system, Adare aims to properly disseminate the content and principles of Legislative Decree 24/2023 within and outside the organisation.

Adare’s objective is to communicate the content and principles of Legislative Decree 24/2023 not only to its employees but also to all potential reporters (as defined by the applicable legislation).

Communication and training activities are tailored according to the target audience but are always guided by principles of completeness, clarity, accessibility, and continuity, allowing recipients to gain full awareness of this procedure’s content, the types of reports that can be made, and the protections granted to the Reporter and the facilitator (where applicable).

Adare guarantees communication and training on the principles and content of this procedure by selecting the most effective means of delivering these services (e.g., training courses, information programmes, distribution of informational materials).

8.6.1. Employee Training

Each employee is required to:

- Gain awareness of the principles and content of Legislative Decree 24/2023;
- Understand the operational methods for submitting a Report;
- Be aware of the implications of anonymous or false reporting (Section 8.5);
- Participate in company training.

Each employee must receive appropriate communication and training regarding Legislative Decree 24/2023 and the procedure in place, with a record kept of completed training.

Training is also provided to all new hires.

In the event of changes to Legislative Decree 24/2023, the company will update the Whistleblowing system and all related documents accordingly.

8.6.2. Other Recipients

The communication activities regarding the content and principles of Legislative Decree 24/2023 are also directed towards individuals identified by the decree as potential reporters. This procedure is made available on the company's website.

8.7. External Reporting Channels

In addition to the internal reporting channel established by the company, the Reporter has the option to use external reporting channels.

The Reporter may turn to the **channel established by ANAC** if an internal report has already been made and no follow-up action has occurred within the timeframe set by the relevant regulations.

Furthermore, the Reporter may submit an external report without first using the internal channel if:

- There are well-founded reasons to believe that an internal report would not be effectively followed up, or that submitting it internally could result in retaliation;
- There is reason to believe that the violation may pose an imminent or clear danger to public interest.

The Reporter may also approach **judicial or accounting authorities** to report illegal conduct of which they have become aware in their work context.

Finally, the Reporter may proceed with a **public disclosure** directly when:

- An internal and external report has previously been submitted, or an external report was made directly, with no response received within the specified timeframe regarding measures taken or planned to address the reports;
- There is reason to believe that the violation may constitute an imminent or clear danger to public interest;
- There are well-founded concerns that external reporting may lead to retaliation or may not be

effectively addressed due to specific circumstances of the case, such as potential evidence concealment or destruction, or where there is reasonable fear that the recipient of the report may be colluding with the violator or involved in the violation.

8.8. Protection of personal data

Adare ensures that the personal data of the Reporter and the Reported Person (considered “data subjects” under Article 4 of the GDPR - Regulation (EU) No 679/2016, as integrated by Legislative Decree 30 June 2003, No. 196, and amended by Legislative Decree 10 August 2018, No. 101), as well as any personal data contained within the Report, are processed in compliance with applicable legislation. The identities of the Reported Person, facilitator, and other individuals involved and mentioned in the Report are protected until the conclusion of any proceedings initiated as a result of the Report.

The Data Controller has undertaken the following:

- Formalised the document “Information on Processing of Personal Data of the Reporter.” This document is available to the Reporter on Adare’s website;
- Formalised the document “Information on Processing of Personal Data of the Reported Person.” This document is available on Adare’s website;
- Formalised the “Appointment Letter as Data Controller for Personal Data Processing” and provided it to the Supervisory Body;
- Formalised the “Appointment Letter as Data Processor for Personal Data Processing” and provided it to the System Administrators;
- Formalised the “Appointment Letter as Data Processor for Personal Data Processing” and provided it to internal personnel involved in handling the Report at the request of the Supervisory Body;
- Formalised the “Appointment Letter as Data Controller for Personal Data Processing” and provided it to external parties involved in handling the Report in any capacity, at the request of the Supervisory Body.

Furthermore, it is noted that:

- Data processing activities related to the management of the Report comply with the principles established by Articles 5 (Principles relating to the processing of personal data), 25 (Data protection by design and by default), and 35 (Data protection impact assessment) of the GDPR.

- The legal basis for processing is the fulfilment of a legal obligation to which the Company is subject under Legislative Decree 24/2023;
- Personal data is processed only for as long as necessary to achieve the purposes that justify its collection and processing (e.g., report collection and management) and is then deleted or anonymised according to established retention periods.
- Any authorisations for personal data processing will be issued by the Data Controller to individuals involved in handling the Report, as requested by the Supervisory Body based on the investigative needs of the specific case.
- Data is retained in line with the terms set forth by Article 14 of Legislative Decree 24/2023, meaning it is kept only for the duration necessary to process the Report and, in any case, for no longer than five years from the date of communication of the final outcome of the Report.
- Personal data that is clearly not useful for processing a specific Report is not collected or, if accidentally collected, is promptly deleted.
- In the event of disciplinary proceedings initiated by Adare against the presumed perpetrator of the reported conduct, the Reporter's identity cannot be disclosed if the disciplinary charge is based on separate and additional findings beyond the Report, even if these findings are consequent to the Report. However, if the disciplinary charge is based wholly or in part on the Report and the Reporter's identity is essential for the defence of the individual against whom the charge has been made or of any person involved in the Report, the Reporter's identity will only be used for disciplinary proceedings with the Reporter's express consent for the disclosure of their identity. In such cases, the Reporter will be given prior notice via written communication detailing the reasons necessitating the disclosure of their confidential data.
- The provider of the platform through which Adare has implemented the reporting channel guarantees that all technical and organisational measures necessary to ensure the security of personal data are in place, in compliance with current regulations, covering the submission, analysis, management, and storage of the Report.

Additionally, under this Procedure, no form of retaliation or discrimination is permitted against the Reporter for reasons connected to the report. Retaliation is defined as any behaviour, act, or omission, even attempted or threatened, that occurs in the work environment and causes unjust harm to protected individuals, whether directly or indirectly.

Retaliatory actions in violation of this prohibition are void.

Discriminatory measures include, for example, unjustified disciplinary actions and any form of

retaliation that results in intolerable working conditions that are, in any case, worse than those previously experienced.

In compliance with applicable regulations, Adare extends the same confidentiality protections to the Reported Person as are granted to the Reporter, except in cases where legal obligations require disclosure of the Reported Person's identity (e.g., requests by judicial authorities).

The Supervisory Body assesses the appropriateness and methods of informing the Reported Person about the existence of the Report, respecting confidentiality obligations regarding the Reporter's identity and considering the need not to compromise investigation requirements.

In any case, the Reported Person has the right to be heard during the investigation, including submitting documentation in support of their observations.

9. MATERIALS AND TOOLS

EthicsPoint - Adare Pharmaceuticals, Inc.

www.navex.com

10. REFERENCE STANDARDS

Reference legislation Legislative Decree 24/2023 available at the following link:

<https://www.gazzettaufficiale.it/eli/id/2023/03/15/23G00032/sg>

11. DOCUMENT HISTORY

Version	Date	Description of the change
01.1	26/01/2024	Draft
01.2	07/02/2024	Final Draft
01	10/09/2024	First edition

DRAFTED BY	REVIEWED BY	APPROVED BY
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