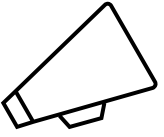
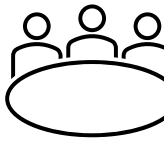
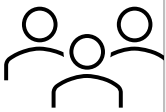


## Chiesi SpeakUp&BeHeard: questions and operative instructions

	<p><b>1. What's SpeakUp&amp;BeHeard?</b></p> <p>SpeakUp&amp;BeHeard ("SU&amp;BH") is a system (consisting of a web platform and a voicemail box) through which anyone (e.g., employee, former employee, supplier, etc.) who becomes aware of conduct contrary to the Group's Code of Conduct or any violation of laws, regulations, or misconduct that could compromise Chiesi's business and/or reputation or cause harm to third parties can inform Chiesi of such conduct.</p> <p>Notwithstanding the above, it is understood that ordinary internal communication flows (e.g. line manager, human resources, compliance Function, etc.) can be activated for all reports that do not have confidentiality implications.</p> <p>Through SU&amp;BH it is possible to communicate:</p> <p><b>A. Conducts <u>relevant</u> for the purposes of Decree 24/23 (hereinafter the "Decree"), concerning:</b></p> <ul style="list-style-type: none"><li>o violations of <b>Model 231</b>;</li><li>o conduct relevant according to <b>Legislative Decree No. 231/2001</b> (e.g., corruption, money laundering, occupational health and safety, environmental crimes, tax crimes);</li><li>o <b>offenses falling within the scope of European Union or national acts</b> relating to the following areas:<ul style="list-style-type: none"><li>▪ public procurement;</li><li>▪ services, products and financial markets and prevention of money laundering and terrorism financing;</li><li>▪ product safety and compliance;</li><li>▪ transport safety;</li><li>▪ environmental protection;</li><li>▪ radiation protection and nuclear safety;</li><li>▪ food and feed safety and animal health and welfare;</li><li>▪ public health;</li><li>▪ consumer protection;</li><li>▪ privacy and data protection and network and information system security;</li></ul></li><li>o <b>acts or omissions that harm the financial interests of the Union</b> (e.g.: fraud, corruption, and any illegal activity related to Union expenditures);</li><li>o <b>violations relating to competition and/or state aid</b>;</li><li>o Acts or conduct that <b>defeat the object or purpose of the provisions of Union acts</b> (e.g., use of "abusive market practices"); or</li></ul> <p><b>B. Conduct <u>not relevant</u> for the purposes of Decree 24/23, affecting (by way of example):</b></p> <ul style="list-style-type: none"><li>o Individual working relationships (of the reporter) or the reporter's working relationship with his or her line manager (e.g., labor disputes, discrimination between colleagues, interpersonal conflicts between the reporter and another colleague);</li><li>o diversity and inclusion;</li><li>o all topics NOT referred to under A. of this Q&amp;A.</li></ul>
	<p><b>2. Who handles my report?</b></p> <p>Reports sent to Chiesi Farmaceutici S.p.A. ("Chiesi Corporate" or "Chiesi") are managed by Chiesi Group Compliance Function, since it is entrusted with the necessary independence and expertise required by the Decree to assess them and manage the internal reporting channel ("Manager").</p>

In particular, within Chiesi Group Compliance Function, the following persons have been appointed as Manager:  
**Mauro Ambanelli** (*Group Compliance Officer, Data Protection Officer & Group Legal Manager*),  
**Valentina Fanelli** (*Group Sr. Legal Counsel & Compliance Manager, Group Anti-bribery Manager*) and  
**Riccardo Spagnoli** (*Global Privacy Officer, GICT Legal Counsel*)

**IMPORTANT!** In the event that the Manager assesses that the report received is the responsibility of another Affiliate, the Manager will proceed to forward the report, through the Platform, to the relevant Affiliate.



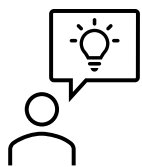
### 3. Who can make a report?

Reporting through SU&BH can be done either by **Chiesi employees** or by **third parties outside Chiesi**.

For the purposes of the Decree, are considered reporters (and benefit from the measures provided for in the Decree regarding the protection of the confidentiality of the identity of the reporter and protection from retaliatory actions provided within the Decree and better described in the next Q&A) **the following categories of people**:

- Employees
- Self-employed workers
- Consultants/collaborators/freelance professionals
- Volunteers/trainees
- Shareholders/directors
- reporters whose **employment/collaboration relationship has ended**, if information about the violation was acquired **during the course of the relationship**
- reporters whose employment/collaboration relationship **has not yet begun**, if information about the violation was acquired **during the selection process**, or in other **pre-contractual stages** or
- reporters during the probationary period

However, Chiesi warrants high guarantees of confidentiality and privacy, as well as the absolute absence of any form of retaliation, even in cases outside the scope of the Decree.



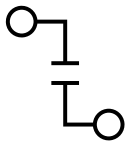
### 4. How is SpeakUp&BeHeard used?

Reporting can be done through:

- **the SU&BH web platform ("Platform")**, which can be accessed through the link [ch-speakupandbeheard.com](http://ch-speakupandbeheard.com);
- **the SU&BH voicemail** (to record the report or request a meeting with the Manager), by contacting the following toll-free number: **800977912**.

**IMPORTANT!** In order to ensure proper handling of the report, reporter must:

- **provide any relevant information/details in their possession** (including any documents) **to enable proper handling of the report by the Manager**;
- (in case of reports communicated via the platform) **log in to the Platform whenever the Platform sends a notification**, following the instructions in Q&A 10;
- **maintain the confidentiality of the reported report and its contents to ensure the highest levels of protection of reporter's identity, that of the reported person and the reported violation.**



## 5. How is it possible to submit a report through the Platform?

To make the report it is necessary to:

- **access the ch-speakupandbeheard.com page** (through the SpeakUp&BeHeard sections of Chiesi Corporate C-Share and website);
- **accept the terms and conditions** (including the privacy policy) on the page;
- **select the Company to which the Report should be addressed** (in the case of Chiesi Farmaceutici S.p.A., "Chiesi Corporate") and press **"START"**;
- once you have entered the Platform, select (again) from the "Company" list the Company to which the Report should be addressed (in the case of Chiesi Farmaceutici S.p.A., "Chiesi Corporate");
- **fill out the fields** regarding the conduct/event, in order to provide a precise description of the reported facts and the persons involved (including those considered potentially responsible for the violation and related witnesses);
- **enter the e-mail** (it is suggested not to enter the company e-mail address, but a personal one), **to be validated with OTP**;
- **upload any documents considered helpful** (including evidence showing that the conduct was committed and/or the event occurred), if available;
- once the message has been sent, the system will generate a **unique identification code** with which, **as an alternative to the communicated e-mail**, reporters will be able to access (through the "*check the status of your report*" button available within ch-speakupandbeheard.com page) the Platform to check the status of the report sent;
- the Manager, **within 7 days of the transmission of the report**, will proceed to take charge of it;
- **once the report has been taken in charge**, reporter will receive a notification on the communicated e-mail;
- in case the Manager sends a **request for clarification** (in order to be able to process the report), **the reporter will receive a notification on the communicated e-mail**.



## 6. How is it possible to transmit a report through SpeakUp&BeHeard voicemail?

To make a Report through SU&BH voicemail, reporters must:

- after **having read the privacy policy** (available both on the C-Share page dedicated to SpeakUp&BeHeard and on the area of the Chiesi Corporate website dedicated to SpeakUp&BeHeard), select the **toll-free number 800977912**;
- **the number from which the call is made is visible to the Manager**. Furthermore, **if the call is made by a Chiesi employee through Chiesi's Teams Channel**, or via a **mobile phone provided by Chiesi**, also relevant name will be visible to the Manager;
- **select the language** with which to make the Report (English or Italian);
- **follow the instructions** provided by the guide voice;
- **the report can be done, alternatively:**
  - a. **by recording a voice message**, which will then be uploaded by the Manager (as an audio file) to the Platform (when reporting the report, a telephone number may be provided to which the Manager can contact the reporter);
  - b. **asking an appointment to the Manager, for the communication of the report**. In such a case, **it will be necessary to provide a telephone number** on which to be contacted in a short time by the Manager, to schedule a meeting.

Voicemail is operational 24 hours/day and 365 days/year.

If the report is communicated through registration on the voicemail (option a.), **the reporter will not have the possibility to access the Platform to check the assessment status of the report**, since reporter will not receive any univocal identification code.

In the event that the reporter does not provide any telephone number or does not identify him/herself, the report will be handled as an anonymous report and dialogue with the Manager cannot be guaranteed.

**7. Is it possible to report anonymously?**



**Platform**  
 When making a report through the **Platform**, reporter can choose whether to **disclose his/her personal information** (first name, last name), or remain **anonymous**. Reporter will still have to **communicate a personal e-mail address** to which the Platform will send notifications (this address can also be completely devoid of identifying elements of the reporter).

**Voicemail**  
 the number from which reporter makes the call will always **visible** to the Manager. **Even if reporter decides to activate the "hide ID" feature, the Manager may still have access to the phone number from which the call is made**, due to technical incompatibilities between the different telephone networks used in the communication and reception of the report.

Furthermore, we remind that **if the call is made by a Chiesi employee through Chiesi's Teams Channel, or via a mobile phone provided by Chiesi, also relevant name will be visible to the Manager.**

**8. How long does it take to evaluate my report?**

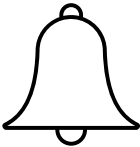


The report **will be taken in charge by the Manager within 7 days** of its communication through the Platform.

The Manager **may ask for clarification** on the report no later than **30 days** after taking it in charge.

The **final assessment** on the report must be made within **3 months** after the report is taken in charge.

**9. How is it possible to check for updates on the report communicated via SU&BH?**



It is possible to check for updates/feedback on the report by clicking on "**check your report status**" available on the **Platform and accessible via the link [ch-speakupandbeheard.com](http://ch-speakupandbeheard.com)**, by inserting the **univocal identification code**, or the **reporter's personal e-mail** (to be confirmed with OTP) communicated in the report form (in case of reports transmitted through the Platform).

It is necessary to diligently guard the **univocal identification code**, keep it confidential, and do not disclose it to third parties.

In the event of a request for clarification from the Manager, once you have completed access to the "**check your report status**" area, you must **select** (by flagging the relevant box) **the report concerned by the request** and press the button "**Add comment / Answer**" or "**Provide Identity**" at the top left of the screen.

**Important!**

In case of reports communicated through the Platform, reporter will receive a notification to the personal email (indicated in the report form) whenever it is necessary to access the Platform (e.g.: report taken in charge, request for clarification from the Manager, feedback on the report from the Manager).

When reporter receives a notification, s/he must log in to the Platform, in order to check whether the Manager has requested clarification and to get updates on the report's management.

Access to the Platform to check the assessment status of the report cannot be made in case the report is communicated through registration on the voicemail (see Q&A n. 6).



**10. Is reporter's identity protected?**

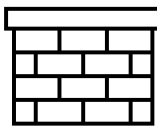
Chiesi guarantees the confidentiality of the reporter's identity and the confidentiality of the information contained in the reports.

Specifically, on the Platform, the name of the reporter, where provided, and the name of the reported person (to be entered in a dedicated field of the form) are protected by encryption systems and visible only to the Manager.

All reports will be anonymized downstream of the relevant evaluation and, in any case, after 5 years from the communication of the final outcome of the report, the Manager will proceed to the relevant deletion from the Platform.

Furthermore, if the reported violation is relevant for the purposes of the Decree, the following additional protective measures apply:

- a) the identity of the reporter (as defined in Q&A No. 3) and any other information from which his or her identity may be inferred (directly or indirectly) may not be disclosed, without his or her express consent, to persons other than the Manager/s;
- b) the protection of confidentiality is extended to the identity of the persons involved (i.e., the persons to whom the violation is attributed or who are otherwise implicated in the violation) and the persons named in the report, until the conclusion of the internal proceedings initiated because of the report.



**11. What is meant by retaliatory action?**

Retaliatory actions include:

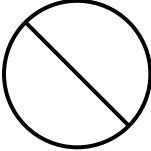


- dismissal;
- discrimination or otherwise unfavorable treatment;
- reputational damages.

Any retaliatory action against the reporter (e.g. dismissal) is strictly prohibited.

In the event that a retaliatory measure is found to have been taken, the sanctions set forth in Chiesi's Disciplinary System will be applied by the company against the person who took the measure.

In case you feel that you have been subjected to one, we suggest that you contact the relevant HR Function.

It should be noted that in case of violations relevant to the Decree, actions reported under Article 17 of the Decree are considered "retaliatory" and include a) coercion, intimidation, harassment, or ostracism; (b) early termination or cancellation of a

	<p>contract for the provision of goods or services; (c) cancellation of a license or permit; and (d) requiring submission to psychiatric or medical examinations.</p> <p>Protection against the retaliatory actions reported under Article 17 of the Decree will apply, in case of reports relevant for the purpose of the Decree, not only to the relevant reporters, but also to the further persons/entity mentioned under Q&amp;A No. 13.</p>
	<p><b>12. Any reporter is protected from retaliatory actions?</b></p> <p>Reporters who have reasonable grounds to believe that the reported information <b>was true at the time of reporting</b> may make the report <b>without fear of retaliatory action</b>, even if such reports should turn out to be untrue.</p> <p>Anyone who makes reports <b>in good faith</b> will be therefore protected from retaliatory/discriminatory measures.</p> <p>In other hand, if it is determined that the report was communicated to purely <b>discredit or for defamatory purposes</b>, the protective measures will not be applied and the reporter may be subjected to disciplinary measures as deemed appropriate.</p>
	<p><b>13. Who benefits from the protections from retaliatory actions provided by the Decree?</b></p> <p>The measures of protection from retaliatory actions provided in the Decree apply to:</p> <ul style="list-style-type: none"> <li>- reporters (as defined in Q&amp;A No. 3);</li> <li>- reporters' facilitators;</li> <li>- persons in the same work environment as the reporter and related to him/her by a stable emotional or kinship relationship within the fourth degree;</li> <li>- the reporter's co-workers who work in the same work environment as the reporter and have a regular and current relationship with him/her;</li> <li>- entities owned by the reporter or for which the reporter works, as well as entities that work in the same work environment as the reporter.</li> </ul>
	<p><b>14. In what cases can I make a report to ANAC?</b></p> <p>When reporting <b>conduct relevant to the Decree</b>, reporter can <b>only</b> make reports to <b>Italian Anticorruption Authority (ANAC)</b> where one of the following <b>conditions</b> is met:</p> <ul style="list-style-type: none"> <li>- the reporter has already made a report through SU&amp;BH and the same has not been followed up;</li> <li>- the reporter has well-founded reasons to believe that, if s/he made a report via SU&amp;BH, it would not be effectively followed up or that it could result in the risk of retaliation;</li> <li>- the reporter has well-founded reason to believe that the violation that is the subject of the report may pose an immediate or clear danger to the public interest.</li> </ul> <p>For any further information on the ANAC whistleblowing channel, please access the page created by the Authority on whistleblowing <a href="https://www.anticorruzione.it/-/whistleblowing">https://www.anticorruzione.it/-/whistleblowing</a>.</p> <p>Please note that <b>the priority reporting channel is internal</b> (SpeakUp&amp;BeHeard).</p>