


PMO-05 ASHORE AND ON-BOARD WHISTLEBLOWING MANAGEMENT

Version	Date	Short Description
2.00	11/03/2019	First issuance
2.01	17/12/2019	General Revision
2.02	01/02/2021	Change of whistleblowing platform
2.03	08/03/2021	Specific revision to adapt the process to the new platform

Issued: HR and HSQE dept


Approved: HR and HSQE dept


SQE Verification: DMR


1. AIM AND SCOPE

The d'Amico Group is committed to conducting business ethically and does not tolerate any violation of the legislative provisions referred to in Legislative Decree 231/2001 (i.e. suspected commission or suspected attempted commission of the offenses as listed in Legislative Decree no. 231/2001), of the principles and ethical behaviour contained in its Code of Ethics and 231 Models, of the d'Amico Group's procedures, policies and rules in general and, in particular, of the Anti-Corruption Policy (CP-PMO-01) or of any applicable laws or regulations by its Employees or Business Partners including by way of example and without limitation cases even attempted of alleged violations of environmental and workplace safety laws, rules and regulations, corruption in carrying out responsibilities, corruption due to an act contrary to official duties, abuse of powers granted to obtain private benefits, accounting irregularities, false declarations, deskilling, non-transparent recruitments, situations of real, potential and apparent conflicts of interest for which adequate disclosure has not been made by the parties involved and which may have consequences on the impartiality and good performance of the d'Amico Group, bullying, sexual harassment, violations of privacy legislation and situations of real, potential and apparent conflicts of interest for which adequate disclosure has not been made by the parties involved and which may have consequences on the impartiality and good performance of the d'Amico Group.

It is crucial to the d'Amico Group's success and reputation that any alleged violations or attempted violations of the above-mentioned principles, procedures, policies and rules or of any applicable laws or regulations are reported promptly and are properly dealt with to avoid any damaging consequences.

d'Amico Group is committed to protecting those raising concerns made in good faith from all forms of retaliation, even if the issues raised prove to be unfounded or untruthful.

This procedure sets out and details the standards underlying d'Amico Group's reporting process through which Employees and Business Partners can report any alleged violation or attempted violation of the principles and ethical behaviour contained in its Code of Ethics and 231 Models committed by any of its Employees or Business Partners.

This Procedure applies irrespective of the jurisdiction involved.

This Procedure supersedes any procedures or directives on reporting, non-retaliation or any related topic that might have been published before the effective date of this Procedure and that do not make reference to this Procedure.

1.1 DEFINITIONS

See all definitions related to Whistleblowing management in the Whistleblowing Policy CP-PMO-02

2. RESPONSIBILITIES AND DUTIES

See all responsibilities and duties related to Whistleblowing management in the Whistleblowing Policy CP-PMO-02

3. PROCEDURE

When applying the following procedure reference should be made to the following paragraphs of the Whistleblowing Policy (CP-PMO-02):

- 3.1 Basic standards;
- 3.2 Reporting alleged Misconduct;
- 3.6 Reference Documents.

3.1 Resource Channels		Responsibilities
<ul style="list-style-type: none"> i. Employees and Business Partners wishing to submit a Report can contact any of following Resources: <ul style="list-style-type: none"> a) DPAs b) Group Human Resources Director; c) Supervisory Committees. ii. These Resources are not listed in order of priority, importance or precedence. Employees are free to reach out to any of the Resources listed above without the obligation of informing any of the other Resources. 	Whistleblower/s	
<i>Record</i>	Online whistleblowing platform, e-mail, dedicated telephone line (voice mail) or ordinary mail	
3.2 Whistleblower Report		Responsibilities
<p>All Reports whether <u>the fact occurred ashore or on board/with reference to a Vessel</u> are submitted via the following d'Amico Group's Reporting System:</p> <p><u>online whistleblowing platform</u> (accessible 24 hours per day, 7 days a week, 365 days a year) https://openreportingsystem.damicoship.com/</p> <p>Alternatively:</p> <p><u>If the fact occurred ashore and is not referred to a Vessel:</u></p> <ul style="list-style-type: none"> i. E-mail: 		Whistleblower/s

	<p>Supervisory Committees of the companies adopting the 231 Model</p> <ul style="list-style-type: none"> • d'Amico Società di Navigazione S.p.A. - odv.dsn@damicoship.com • d'Amico Shipping Italia S.p.A. - odv.dsi@damicoship.com • d'Amico International Shipping S.A. - odv.dis@damicoship.com <p>Group Human Resources Director</p> <ul style="list-style-type: none"> • d'Amico Human Resources - hr.whistler@damicoship.com <p>ii. Hotline:</p> <p>+39 06/84561516 (answering service)</p> <p>or</p> <p>Contact the Group Human Resources Director Mr. Francesco Rotundo +39 06/84561320</p> <p>iii. Ordinary mail:</p> <p>d'Amico Società di Navigazione S.p.A. Corso d'Italia 35/B - 00198 Roma – Italy K.attn. Maurizio Bergamaschi and/or Francesco Rotundo</p> <p><u>If the fact occurred on board or even ashore but with reference to a Vessel:</u></p> <p>i. E-mail:</p> <p>noncompliance@damicoship.com noncompliance@ishimaship.com</p> <p>ii. Hotline:</p> <p>+39 06/8411567</p> <p>Contact the DPAs (Designated Persons Ashore) Capt. Taiano taiano.s@damicoship.com +393357700256 Capt. Gandhi gandhi.m@ishimaship.com +6596796281</p>
	<p>Employees or Business Partners reporting alleged Misconducts can expect confirmation of receipt of their Report within 10 business days from the Resource with which the Report was filed.</p> <p style="text-align: right;">DPAs, Group HR Director & OdV</p>
Record	Online whistleblowing platform, e-mail, dedicated telephone line (voice mail) or ordinary mail

3.3 Evaluation	Responsibilities
<p>Preliminary evaluation of the 231 relevance of the Reports received and of the company involved in the Report.</p> <p>In case the Resource receiving the 231 Reprt is the DPA and the 231 Report pertains to a company adopting the 231 Model, the Report is shared with the respective Supervisory Committee who will therefore manage the Report (remaining the DPAs the sole interface with the Whistleblower). If the 231 Report pertains to a company non adopting the 231 Model the Report is shared with all the Supervisory Committees that will then address the Report to the HR Director who will then manage directly the Report or address the Report to the competent person identified by each single company involved in the Report (if any).</p> <p>In case the Resource receiving the 231 Reprt is the Group HR Director and the 231 Report pertains to a company adopting the 231 Model, the Report is shared with the respective Supervisory Committee who will therefore manage the Report as a whole directly interfacing with the Whistleblower. If the 231 Report pertains to a company non adopting the 231 Model the Report is directly managed by the HR Director or addressed to the competent person identified by each single company involved in the Report (if any).</p>	<p>DPAs, Group HR Director & OdV or person identified by each single company involved in the Report (if any)</p>
<p>The Supervisory Committees evaluate those Reports having a 231 relevance and pertaing to a company adopting the 231 Model and determine any initiatives, if necessary asking clarifications to the Reporter and/or the person identified as responsible for the alleged violation and/or any other person that may be considered relevant for the evaluation, giving reasons in writing for any conclusion reached. Lastly the SC has to verify that the Report is sufficiently detailed so as to be able to carry out a subsequent in-depth investigation.</p>	<p>OdV</p>
<p>The Reports managed by the Group Human Resources Director or by the DPAs or by a person identified by each single company involved in the Report (if any) are also preliminarily evaluated in order to verify that they are sufficiently detailed to be able to carry out an in-depth investigation.</p> <p>All the Reports managed by the DPA are also shared with the Fleet Director the reports are made visible (in read-only mode, without any possibility of interaction with either the reporting party).</p>	<p>DPAs & Group HR Director or person identified by each single company involved in the Report (if any)</p>
<p>In the event that the DPAs, the Group HR Director, the OdVs or the person identified by each single company involved in the Report (if any) have a potential conflict of interest related to the specific report within their competence such as to compromise the impartiality or independence of judgment:</p> <ul style="list-style-type: none"> • if the facts to be reported occurred ashore, the report will be managed by a Ground Reserve Function (identified in the person of the external member of the Supervisory Committees) 	<p>On-board or Ashore Reserve Function</p>

**SQE MANAGEMENT SYSTEM PROCEDURE
ASHORE AND ON-BOARD
WHISTLEBLOWING MANAGEMENT**

<ul style="list-style-type: none"> • if the events subject to report occurred on board or if they occurred ashore but with reference to a Vessel, the report will be managed by an on-board Reserve Function (identified in the person of the Group HR Director). 	
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Record	Any evidence collected and separately archived in an ad hoc register (the “ Register of Reports ”) or within the online whistleblowing platform
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3.4 Investigations	Responsibilities
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<p>If the Report is sufficiently detailed, the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function will initiate the investigation and verification activities. If not, they will archive the Report, with a brief explanatory note.</p> <p>More specifically:</p> <ul style="list-style-type: none"> • Investigation activities: the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function examine the Report at their sole discretion and under their own responsibility in order to assess the need for specific in-depth examinations to ascertain the facts reported therein. This need is determined on the basis of the following elements: (i) supporting information provided by the Report; (ii) current procedures in force relating to the reported facts; (iii) previous Reports/verifications on the same subject and already examined. • Verification activities: the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function carry out ad hoc checks, in a confidential manner, as appropriate, on the basis of the subject of the Report. Any verification activities are carried out with support from the competent functions or external parties and in compliance with all the rules applicable to the protection of both the Reporter and of any persons involved in the checks. <p>If the Supervisory Committees or DPAs or Group HR Director or person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function consider that the Report is unfounded and that there is no need for further checks, they will draw up a brief explanatory note of the investigation conducted and involve the HR Department in subsequent reviews.</p> <p>If the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function consider that the Report is well-founded, they will assess its significance.</p>	<p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function</p>
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Record	Register of Reports or the online whistleblowing platform
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3.5 Evaluation of Corrective Actions		Responsibilities
<p>The initial evaluation assesses whether the event occurred in the presence of and despite all the necessary provisions or whether corrective actions are required with regard to the Integrated Management System and/or the Organisational Management and Control Models.</p> <p>Where the investigation identifies the need for corrective action, the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function will request the implementation of such action plan by the competent functions.</p>		<p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function & Department Involved</p>
<i>Record</i>	Register of Reports or the online whistleblowing platform and action plan	
3.6 Report to management and judicial authority		Responsibilities
<p>Where the investigation identifies the need for corrective action, the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function will inform Top Management of the actions undertaken in the context of their a periodic reports.</p> <p>If the investigation identifies the need to submit a report to the judicial authority on the grounds of the criminal significance of the event investigated, the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function will inform Top Management without delay and the latter ultimately decides to submit the Report to the judicial authority.</p>		<p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function & Top Management</p>
<i>Record</i>	Report to Top Management and to Judicial Authority	
3.7 Bad faith review		Responsibilities
<p>If the investigation finds that the Report is unfounded, the Supervisory Committees or DPAs or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the Ashore Reserve Function will involve the Group HR Director in subsequent reviews and in case of investigations conducted directly by the Group HR Director also in its charge of On-board Reserve Function, the HR Department will open a different process in order to review the conduct of the Reporter (if an Employee).</p>		<p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function & HR Department</p>
<i>Record</i>	Register of Reports or the online whistleblowing platform	
3.8 Disciplinary Sanctions		Responsibilities
<p>In the event of bad faith in the Reporter's conduct (if an Employee), the HR Department will open disciplinary proceedings to assess the applicable sanctions.</p> <p>Following the disciplinary procedure, the sanctions imposed will be communicated to the Supervisory Committees or DPAs or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-</p>		<p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function & HR Department</p>

<p>board or Ashore Reserve Function, which note these sanctions in the Register of Reports.</p> <p>Vice versa, no sanction will be imposed on those (Employee or Business Partner) who filed a Report in good faith which, as a result of the investigation, has since proved unfounded.</p>	
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<i>Record</i>	HR processes and Register of Reports
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3.9 Archiving	Responsibilities
<p>The Supervisory Committees or Group HR Director or the person identified by each single company involved in the Report (if any) or, in case of potential conflict of interest, the On-board or Ashore Reserve Function archive the Report with a brief explanatory note in the following cases, where:</p> <ul style="list-style-type: none"> - following an initial assessment, the Report proves insufficiently detailed; - as a result of the investigation and verification activities (Investigations), further checks are unnecessary as they consider the Report unfounded though the Reporter acted in good faith (in this case, following a review of the conduct carried out jointly with the HR Department). 	<p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function</p> <p>SCs, DPAs, Group HR Director, person identified by each single company involved in the Report (if any), On-board or Ashore Reserve Function & HR Department</p>

<i>Record</i>	Register of Reports or the online whistleblowing platform
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