

Classification unrestricted

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The Control Requirements resulting from this Policy are:

Set of control requirements ref.	1.1-1	that the centrally defined Compliance System is implemented including local legal requirements and that a suitable monitoring is used to enforce and monitor the status of the implementation and its effectiveness.
	1.1-5 (ELC 4,5,6)	Deviations of the entity's expected standards of conduct are identified and remedied in a timely and consistent manner.

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Document approved by the meeting of the Management Board of Yunex GmbH on 30 November 2023.

1 PURPOSE

Yunex Traffic is part of the Mundys S.p.A. Group and combines sound business and financial discipline with a commitment to operating in accordance with environmental, ethical and governance principles that meet the highest international standards. In all its activities Yunex Traffic requires ethical and professional integrity, correct behaviour and full compliance with the laws and regulations of all the countries in which it operates, as well as with honesty, reliability, impartiality, loyalty, transparency, fairness and good faith principles.

In line with international best practice and in full compliance with applicable regulations, Mundys S.p.A. has implemented a process for collecting and managing reports of behaviours which fail to meet the expected standards ("Reports"), which Yunex Traffic, as a Mundys Group company, has also adapted to its needs and adopted via this Policy. The current whistleblowing management system features the following:

- management of whistleblowing across Yunex Traffic group (including affiliated companies), through specific whistleblowing channels and accountability to the Yunex Traffic Whistleblowing Committee in the interests of timeliness and effective analysis;
- provision of common mechanisms for detecting and managing any conflicts of interest in the process of managing Reports;
- the assignment, without prejudice to the collegiality of the Yunex Traffic Whistleblowing Committee, of responsibility for the implementation and management of the Whistleblowing process within Yunex Traffic, from receipt of Reports to implementation of the preliminary investigation to the Whistleblowing Coordinator;
- provision of information flows with the other functions in the Risk and Internal Control Management System.

This Policy regulates the process whereby Reports are received and handled (so-called whistleblowing) in accordance with Directive (EU) no. 2019/1937, and in compliance with privacy legislation and any other legislation in force. Since the EU Directive has to be adopted into local law in each EU country, and in accordance with **POL_1.2.2.2 (Implementation of Yunex-internal regulations in Affiliated Companies)**, the Executive Management of each Affiliated Company (both terms as defined in the afore-mentioned policy) shall check any local legal requirements and align with YU LC and YU FPM - Shareholder Controlling in case any local amendments to this policy shall be required, so that the necessary approvals for deviations to the Policy can be obtained.

2 SCOPE

This Policy is binding across the whole Yunex Traffic Group, regional legal entities ("Countries") and also applies to Yunex Traffic Affiliated Companies in accordance with **POL_1.2.2.2 (Implementation of Yunex-internal regulations in Affiliated Companies)**.

Countries or Affiliated Companies may only issue specific or deviating guidelines that are within the scope of this Policy if they are required by law and/or are necessary to address or mitigate specific business risks. Any such regulation must be approved by the Yunex Traffic VP Legal & Compliance prior to issue.

The addressees of the Policy are senior management, members of the Management and Supervisory Boards of Yunex GmbH, employees (e.g., direct, indirect, interns and trainees), as well as third parties (e.g., customers, suppliers and consultants) who are entitled to submit whistleblowing reports, if they have any information regarding violations – i.e., conduct, acts or omissions detrimental to the public interest or the integrity of the Group or its companies – (or alleged violations) of:

- Law, rules and regulations; and
- The Code of Ethics (see [Compliance - Yunex Traffic](#)) and additionally (in the case of Yunex employees) the following which are available in YUPad:

- **POL_1.1.1 (Global Compliance Policy)**, especially the matters listed as “compliance cases” in section 7 of that Policy;
- The Mundys Group Anti-Corruption procedure;
- The corporate internal regulatory framework (policies, procedures, etc.).

3 MAJOR CHANGES COMPARED TO LAST REVISION

Version:	Date:	Change description:
1.0	30/11/2023	Initial version based on Mundys updated Whistleblowing Management Guidelines dated 2 August 2023

4 PROCEDURE

4.1 General Guidance

The provisions of this Policy shall be supplemented by the provisions of:

- the Code of Ethics;
- Laws and regulations in the countries in which Yunex operates;
- all company rules and regulations, including but not limited to **POL 1.1.1 (Global Compliance Policy)** and **POL_1.4.2 (Risk and Internal Control)**, the Mundys Group Anti-Corruption Procedure, the Mundys Group Human Rights Framework, and the Mundys Group Diversity, Equality and Inclusion Guidelines;
- European Regulation 2016/679 for the protection of personal data (GDPR) and European and national legislative interventions and/or measures by the competent authorities (Privacy Regulation).

4.2 Roles and Responsibilities

Please refer to section 4.3 for the relevant Roles and Responsibilities at each step of the process.

4.3 Process steps

The process consists of the following **steps**:

- receipt of Reports;
- preliminary verification of Reports (“Plausibility Check”);
- investigation of Reports;
- closing of Reports.

4.3.1 Receipt of Reports

4.3.1.1 Reporting Channels

In order to ensure the effectiveness of the reporting process and provide total and indiscriminate access to all those who wish to make a Report, Yunex Traffic provides various channels, including:

- an IT platform, accessible to all whistleblowers (employees, third parties, etc.) on the Yunex Traffic website and on Yunex Traffic’s intranet, where a written or oral Report may be submitted (see [Compliance - Yunex Traffic](#));
- an email sent to the Yunex Traffic Compliance Team shared mailbox: compliance@yunextraffic.com;
- the possibility to make oral reports to the reporter’s line manager, to the local Compliance Officer or VP Legal & Compliance. Line Managers are reminded that any reports should be forwarded directly to the Compliance Team and that the reporter’s identity should be protected;
- making a report to any member of the YU Legal & Compliance (YU LC) team;
- making a report to the YU HR department.

If possible, use of the first channel (IT platform) is preferable.

Similarly, whilst submission of anonymous Reports is possible at Yunex Traffic, the Group recommends the submission of a non-anonymous Report, in order to speed up and facilitate investigations. Guarantees and protections afforded to whistleblowers are set out in 4.8.

A Whistleblower may also report through external channels (which depend on the reporter's location and applicable local regulations) or make a public disclosure under certain legally regulated conditions.

The responsible Yunex Traffic Compliance Officer ensures that any Reports not made via the Whistleblowing Hotline are registered immediately in the Whistleblowing Hotline to ensure a single and secure log of all cases and supporting information. Upon entry into the Whistleblowing Hotline, each Report is allocated a unique case number, and the responsible Compliance Officer shall ensure that, as a minimum the following information is entered (and kept updated as necessary throughout the whistleblowing management process): a) date and intake method; b) Group Company involved, if any, or location of suspected violation; c) Whistleblower's name (if communicated); d) Whistleblowing subject name and summary of the report; e) type of alleged violation reported; f) date of initiation and conduct of preliminary investigation; g) investigation status; h) Case outcome; i) list of information contributors and additional investigation team members involved on a "need to know" basis.

4.3.1.2 Receipt Of "Off-Channel" Reports

It is not unusual for Whistleblowing Reports to be received via unofficial channels that are not described in the Policy (e.g. anonymous letters sent to the management and senior management). With regard to a specific situation, any employee receiving a report outside official channels has the responsibility and the moral duty to:

- make the Whistleblower, if identifiable, aware of the importance of submitting the Report through official channels;
- submit the Report received to the Yunex Traffic Compliance Team through official channels, specifying the source insofar as known.

The Yunex Traffic Compliance team ensures that any "Off-Channel" reports made to them are registered in the Whistleblowing Hotline promptly.

4.3.1.3 Content Of Reports

The Reporter/Whistleblower makes Reports by providing as much information as possible related to the alleged violation(s) at their disposal in accordance with applicable regulations. The Whistleblower should have well-founded suspicions of wrongdoing and where possible concrete evidence or supporting information related to the alleged violations (including, where relevant, any attempts by the Subject to conceal wrongdoing) to enable the Report to be properly investigated.

The subsequent stages of preliminary verification and investigation are facilitated by Reports with precise and detailed content, such as by way of example:

- the identity of the Reporter Subject (e.g., personal and contact details), in cases where anonymity has not been opted for;
- a clear and complete description of the facts reported, with an indication of the known circumstances (manner, time and place);
- the identity of the Subject(s) insofar as known;
- an indication of any other persons who may report on the events being reported;
- any documents – also in physical form – substantiating the Report;
- any other useful information regarding the events that are the subject of the Report; and
- any documentation supporting the Report's validity.

4.3.2 Preliminary verification of Reports (“Plausibility Check”) and internal reporting procedure;

The Yunex Traffic Compliance Team analyses the Reports received and if a Report:

- contains precise, detailed and verifiable information, provides acknowledge of receipt to the Whistleblower within seven days of receipt and knowledge by at least one member of the Yunex Traffic Compliance Team and requests that an investigation mandate is issued by the VP Legal & Compliance. The investigation mandate is issued as soon as possible after the request and is circulated to the members of the Management Board, VP HR and local MD / MDF and HR heads if applicable and following the need to know principle. The local Compliance Officer then starts the relevant investigation, together with the support of any other relevant functions, to the extent necessary and as approved by the VP Legal & Compliance;
- contains unsubstantiated and/or unverifiable information, or the Reporter is unavailable to provide the necessary additional information, the Report is closed; or
- relates to matters that do not fall within the scope of application of this document and/or whistleblowing legislation (so-called "non-related Reports", such as, by way of example, commercial complaints, commercial proposals, marketing activities), the Report is forwarded to the relevant department for handling.

If Mundys S.p.A.’s Whistleblowing Committee directly receives a Report regarding Yunex Traffic, it shall forward it to the Whistleblowing Coordinator, which is responsible for handling the Report and keeping the Mundys S.p.A Whistleblowing Committee informed about the outcomes of the verification activities.

The Whistleblowing Coordinator shall present any new Reports to the Yunex Traffic Management Board in the next scheduled Management Board meeting following receipt of the Report, and shall provide an update on any open Reports to the Yunex Management Board meeting on a monthly basis until the Report is closed.

The Whistleblowing Coordinator shall inform the Yunex Traffic Management Board of the outcome of any investigation, together with any proposed remediation measures, prior to closing a Report. If deemed necessary, the Yunex Traffic Management Board may request further information from Whistleblowing Coordinator. In case of any Reports concerning Yunex Traffic that could have a reputational risk towards the Mundys Group, the Whistleblowing Coordinator shall inform the Mundys S.p.A. Whistleblowing Committee promptly.

The Mundys S.p.A. Whistleblowing Committee may also reserve the right to handle Reports regarding Yunex Traffic when it perceives a significant impact (e.g. reputational and/or economic/financial damage) for the Mundys Group (including the holding company) or other Mundys Group companies. Moreover, it is possible that a Report received via Yunex Traffic may have a significant impact on the Mundys Group. In this case, as part of the preliminary verification phase, if the Yunex Traffic Compliance Team deems the Report to be particularly relevant for the Mundys Group as a whole, in terms of potential impact, it will inform the Mundys S.p.A Whistleblowing Committee which will evaluate any action to be taken, in addition to receiving Yunex Traffic’s regular reporting as required under the section “Reporting to the Supervisory Board and Mundys Group” below. On completion of investigation of the Report, the Yunex Traffic Compliance Team will inform the Mundys S.p.A. Whistleblowing Committee of the outcome.

The Whistleblowing Coordinator defines, where necessary, communication flows to the Administration and Control Bodies (see section "Handling of Special Cases and Potential Conflicts of Interest" in this Policy). As part of these communication flows, the Whistleblowing Coordinator informs, as appropriate, the other stakeholders as necessary e.g. the Supervisory Board.

Finally, the Whistleblowing Coordinator has the power to:

- close Reports relating to facts already known and fully ascertained by the Yunex Traffic Whistleblowing Committee without the Report adding or allowing the addition of further elements or aspects to what is already known (so-called "Outdated Reports");
- refrain from processing Reports relating to (i) facts in relation to which investigations by public authorities are known to be in progress (e.g., judicial authorities and administrative bodies); and (ii) fact that are already known and are the subject of pending litigation between Yunex Traffic and Third Parties or Employees (so-called "Reports on facts under investigation/ongoing lawsuits").

4.3.3 Investigation of Reports

The aim of this stage is to carry out in-depth investigations, in accordance with the procedures defined in **section 7 of POL_1.1.1 (Global Compliance Policy)**, in order to objectively ascertain whether or not the reported facts are well-founded.

To this end, the Yunex Compliance Team shall take the lead in the Investigation process, with the support of other competent functions and/or external consultants depending on the subject of the Report. The local Compliance Officer shall report on the results of the investigation to the Whistleblowing Coordinator, which may request any necessary additions and shall assess, on a case-by-case basis and on the basis of the evidence progressively brought to its attention, whether it is appropriate to activate communication flows towards the Administration and Control Bodies and other stakeholders as necessary (e.g. Supervisory Board).

Finally, the local Compliance Officer, is responsible for providing feedback on the Report status and any other information required by the applicable local regulations to the Whistleblower in a timely manner and in accordance with local laws.

4.3.4 Closing of Reports.

The local Compliance Officer shall examine the results of the investigation step, and:

- should the content of the Report be confirmed, align the definition of any necessary remediation measures together with the VP Legal & Compliance and other competent functions (e.g. HR) on a subject-to-subject basis and in accordance with any existing internal approval matrices;
- should weak areas and/or points for improvement in the Risk and Internal Control System emerge during the investigation (regardless of the outcome), refer the recommendations to the Head of ERM and Head of Internal Audit to define action plans, and (as part of the follow-up process) monitor their implementation within the agreed timeframe; and
- submit the final draft of the report summarizing the results of the preliminary investigation ("Investigation Report") to the Whistleblower Coordinator for review and onwards communication.

The Whistleblowing Coordinator shall circulate the Investigation Report to the members of the Management Board before its final closure, in order to identify any further needs for investigation or remediation measures.

Finally, the Whistleblowing Coordinator produces a final Investigation Report, classifying as the respective allegation(s) as "Founded" or "Not Founded" and "With Actions" or "Without Actions", whether for improving the Internal Control System or otherwise (e.g., reporting to the judicial authorities) and circulates it to the members of the Management Board, VP HR and local MD / MDF and HR heads if applicable.

4.4 Reporting to the Supervisory Board and Mundys Group

The Whistleblowing Coordinator shall report to the Supervisory Board, on a quarterly basis, as a minimum covering the following topics:

- New Reports during previous quarter;

- Update on open Reports during previous quarter;
- Status and update to Business Partner landscape (refer to **POL_1.1.4 (Business Partner and Third Party Intermediaries – Definition and Due Diligence Process)**);
- Reportable Data breaches during previous quarter;
- Training & communications released during previous quarter and planned during upcoming quarter; and
- Key Statement, identifying any patterns or connection between Reports or compliance allegations or any indications of any systematic compliance violations.

The Whistleblowing Coordinator shall report Whistleblowing reporting data to Mundys Whistleblowing Committee on a half-yearly basis. Specifically, the reporting includes:

- the total number of Reports received by type of violation;
- details about Reports having relevance at a Mundys Group level; and
- any whistleblowing framework improvement actions (e.g., IT systems, processes and procedures) resulting from periodic assessment and with a view to achieving continuous improvement.

The documentation (both in paper and electronic form, including the file dedicated to the individual Reports and containing the documentation relating to the preliminary verification and assessment activities and their results) prepared and managed as part of process in question is kept by the Yunex Traffic Compliance Team, in compliance with the appropriate levels of security in relation to the risk of accidental or illegal destruction, loss, modification, disclosure and access to information by unauthorised persons.

4.5 Handling of special cases and potential Conflicts of Interest

Should the reported facts concern:

- one or more members of the Yunex Traffic Compliance Team, the Whistleblower Coordinator shall inform the Chairperson of the Supervisory Board without delay, who, having heard the opinion of Whistleblower Coordinator, shall assess whether to entrust the investigation to the Yunex Traffic Compliance Team with the exclusion of the person(s) involved, or whether to manage it directly, in compliance with this Policy, including with the support of an external consultant;
- one or more members of the Management Board, the Board of Directors of Mundys S.p.A. and/or the Supervisory Board, the Whistleblowing Coordinator shall promptly inform the Chairperson of the Supervisory Board or Chief Executive Officer (except in cases that directly concern them). In such event, the Report will be forwarded to the most senior member of the respective body for handling (as applicable), so that a preliminary investigation may be carried out to assess the legitimacy of the Report, including with the support of the competent department and/or external consultants.

In the event of further and different situations where a member of the Whistleblowing investigation team has a conflict of interest, it shall be their responsibility to declare the conflict and refrain from whistleblowing management.

4.6 Communication & Training

The Yunex Traffic Compliance Team is responsible for promoting, over time, the necessary awareness and training initiatives aimed at the whistleblowing management staff to whom this Policy is addressed. Employees are also trained regarding the usefulness of the process, the supporting tools, and the guarantees and protections for Reporters and Subjects.

4.7 Yunex Traffic Whistleblowing Committee Meetings

The Yunex Traffic Whistleblowing Committee is swiftly convened at the Whistleblower Coordinator's request whenever a Report is received that is deemed to be of particular relevance in terms of reputational and operational risk and that is substantiated and verifiable, in order to define the investigation methods, request any further analysis, declare its closure and define the necessary communication flows. A meeting of the Committee may also be convened, if necessary, to analyse Reports whose relevance, competence and verifiability are doubtful.

Even in the absence of any allegations, the Yunex Traffic Whistleblowing Committee shall review the overall Compliance communication strategy and strategic plan at least once per year, to assess the adequacy of the process in question and to suggest any improvements to the Whistleblowing Coordinator, including any necessary information and training initiatives aimed at the workforce.

The Yunex Traffic Whistleblowing Committee shall follow the same rules of procedure as Management Board meetings, and regular meetings shall take place within the Legal & Compliance update section of the Management Board meeting.

Minutes at meetings are taken and stored within the Management Board minutes, with access restricted to the members and regular functional attendees of the Management Board meetings (i.e. VP HR, VP of Legal & Compliance).

4.8 Guarantees and Protections

4.8.1 Confidentiality Guarantee

All Yunex Traffic and Mundys Group staff involved in the handling of Reports in any capacity whatsoever shall guarantee confidentiality regarding the existence and content of the Report, as well as the identity of the Reporter/Whistleblower (where disclosed) and Subject, in accordance with applicable regulations.

In carrying out their reporting management activities, the members of the Yunex Traffic Whistleblowing Committee and Yunex Traffic Compliance Team are not subject to hierarchical powers and controls and have specific confidentiality obligations, including towards colleagues and hierarchical superiors.

Any communication concerning the existence and content of the Report, as well as the identity of the Reporter (where disclosed) and the Subject(s), shall strictly follow the "need to know" principle.

To this end, the Yunex Traffic Compliance Team shall record in the Whistleblowing Hotline and in each Investigation Report the list of persons to whom it has become necessary to provide communications regarding each Report and the information disclosed (e.g. existence and/or content of the Report, the identity of the Reporter and/or the Subject(s), the outcome of the investigations carried out, etc.).

4.8.2 Reporter/Whistleblower protection

4.8.2.1 Confidentiality Of The Reporter/Whistleblower's Identity

Yunex Traffic shall guarantee the confidentiality of the Reporter's identity from the time the Report is received, in accordance with the law. The protection also applies before the establishment of the legal relationship (if the information was acquired during the recruiting process or in the pre-contractual phase), during the trial period or after the termination of the employment relationship (if the information was obtained during the course of the relationship).

For Reports transmitted via the IT platform referred to in the paragraph "**Receipt of Reports**" above, the confidentiality of the identity of the Reporter (as well as the content of the Report) shall be protected in the following ways:

- the platform shall be provided by a specialist third party independent from Yunex Traffic;

- the platform shall adopt the "no-log" procedure i.e., it shall not collect in any way, either directly or indirectly, information on how the connection is made (e.g. server, IP address, mac address), thereby guaranteeing complete anonymity. In particular, this means that the company's IT systems shall be unable to identify the access point to the portal (IP address), even if access is made from a computer connected to the company network;
- the platform shall guarantee high standards of security, employing advanced encryption algorithms and other methods to prevent unauthorised access;
- no registration shall be required for Internet access to the company's website (available to anyone, including employees), and the Reporter may remain anonymous. If they wish, Reporter may otherwise provide their name and express consent for their details to be communicated to the Yunex Compliance Team.

For Off-Channel Reports, the confidentiality of the Reporter's identity (as well as the content of the Report) shall be protected in the following ways:

- paper mail addressed to the Yunex Compliance Team shall be delivered unopened (as delivered by the postal service) to the local Compliance Officer or Compliance Ambassador (in countries that do not have a local Compliance Officer);
- only members of the Yunex Compliance Team shall have access to the Yunex Traffic Compliance Team shared mailbox; the administrator of the company email system may only access the shared mailbox for technical reasons, subject to a justified case-by-case request to be forwarded in writing to the Whistleblowing Coordinator, and access shall only be granted upon prior written authorisation (from the Whistleblowing Coordinator). In all cases in which the name of the Reporter has been communicated, the Reporter's name shall only appear in the relevant Report log in the Whistleblowing Hotline. Outside of the Whistleblowing Hotline, the Report shall be referred to using the case reference number allocated via the Whistleblowing Hotline.

Yunex Traffic shall guarantee the use of appropriate technological and organisational measures to ensure that the processing of personal data is carried out in compliance with the regulations laid down by the applicable privacy legislation.

If the dispute concerning the Report is founded, in whole or in part, and the Whistleblower's identity is deemed necessary for the defence of the accused, the Report will only be used for the purposes of disciplinary proceedings if the Whistleblower has expressly given his/her consent to the disclosure of his/her identity. In accordance with applicable legislation, the reasons for the disclosure of the confidential data are notified to the Whistleblower in writing.

4.8.2.2 Protection Of Reporters From Retaliation Or Discrimination

In compliance with the law, Yunex Traffic and the entire Mundys Group shall prohibit and sanction any forms of retaliation or discrimination against the Reporter/Whistleblower (or anyone who has cooperated in ascertaining the facts reported), regardless of whether the Report turns out to be well-founded.

Examples of retaliation or discrimination include but are not limited to: (a) dismissal, suspension or equivalent measures; (b) downgrading or non-promotion; (c) change of duties, change of place of work, reduction of salary, change of working hours; (d) suspension of training or any restriction on access to it; (e) negative merit notes or references; (f) the adoption of disciplinary measures or any other sanction, including financial penalties; (g) coercion, intimidation, harassment or ostracism.

In particular, should the bona-fide Reporter be an employee, the Yunex Compliance Team (availing itself of the relevant corporate functions) will ensure that the employee's work life is maintained for a period of 2 years from the date of the Report, in order to prove the absence of any discriminatory action or other forms of retaliation following the Report.

The above protection measures are also extended to (a) enablers (witnesses); (b) persons in the same work environment as the Whistleblower; and (c) co-workers of the Whistleblower, who work in the same work environment as the Whistleblower and who have a usual and current relationship with the Whistleblower.

4.8.2.3 Protection of Subject(s)

Yunex Traffic and the Mundys Group shall require everyone to cooperate in maintaining a corporate environment of mutual respect and shall prohibit any conduct that may harm the dignity, honour and reputation of any individual. The guarantees of confidentiality established in this Policy shall also protect Subjects.

The Subject shall not be subject to disciplinary sanctions in the absence of objective evidence of the reported violation, i.e. without investigating the reported facts and notifying the related charges in accordance with the legal and/or contractual procedures.

Subject may not request to know the name of the Reporter/Whistleblower, except in the cases expressly provided for by law.

For the purpose of further protecting Subjects, the actions and powers allowed to them by law remain unaffected.

5 KEY PERFORMANCE INDICATORS (KPI)

In line with Yunex Traffic's objective to ensure a speak up culture, there are no KPIs associated with the number of Reports per annum. The Yunex Traffic Compliance team instead focusses on prevention of violations (via awareness and training) and timely investigation of Reports.

6 MANAGING THE TRANSITION

N/A

7 CONTROL OF RECORDS

Doc No / Title	Who	Where	Retention period	Protection measures	How to destroy
N/A					

8 ABBREVIATIONS AND DEFINITIONS

Abbreviation	Description
N/A	

Definitions	Description
ADMINISTRATION AND CONTROL BODIES	Means any or all of the Management Board, Supervisory Board and Mundys Group
ANTI-CORRUPTION PROCEDURE	means the internal Mundys Group Anti-Corruption Procedure.
CODE OF ETHICS	means the Yunex Traffic Code of Ethics, based on the Mundys S.p.A. Code of Ethics, which is publically available and identifies the core values that make up

	the corporate culture and are translated into the management principles and internal policies that form the basis of daily operations.
ENABLER	means a person who assists a Whistleblower in the reporting process, operating within the same working environment, whose assistance shall be kept confidential.
MUNDYS GROUP	means Mundys S.p.A. and the Companies controlled by the latter, either directly or indirectly.
REPORT	means an oral or written communication, concerning facts that are considered as: unlawful conduct or irregularities; violations of regulations; actions likely to cause damage to the company's assets or image; violations of the Code of Ethics; violations of the Anti-Corruption Procedure; violations of section 7 of POL 1.1.1; violations of company procedures and provisions.
REPORTER/ WHISTLEBLOWER	means any person (both inside and outside the Yunex Traffic Group) who makes a Report, having obtained information on the matters referred to above.
RETALIATION	means any conduct, act or omission, even if merely attempted or threatened, carried out as the result of a Report or a complaint to the judicial or accounting authority, or public disclosure, which causes or may cause the Whistleblower or the person making the complaint unjust harm, either directly or indirectly.
SUBJECT	means any person to whom the facts subject to a Report relate or can be attributed.
SUPERVISORY BODY or SB	means the Supervisory Board set up pursuant to the articles of association of Yunex GmbH and §52 of GmbHG as consolidated and published in the Federal Law Gazette III, Index No. 4123-1, as last amended by Article 5 of the Act of 15 July 2022 (Federal Law Gazette I, p. 1146), responsible for overseeing and appointing the members of the management board and approving major business decisions.
YUNEX TRAFFIC WHISTLEBLOWING COMMITTEE	means the Yunex Traffic Management Board, VP Legal & Compliance and VP HR.
WHISTLEBLOWING COORDINATOR	means the VP Legal & Compliance Compliance, who governs end-to-end the whistleblowing process from receipt of a Report to the closure of the investigation and promotes the necessary awareness-raising and training measures for Yunex Traffic. The Coordinator shall represent the Yunex Traffic group during meetings of the Yunex Traffic Management Board and, if necessary at meetings with Mundys Group or third parties (e.g. public authorities) regarding whistleblowing or compliance topics. The Coordinator is entitled to delegate certain tasks to the responsible Compliance Officer (for US, Colombia and EMEA/APAC)
WHISTLEBLOWING HOTLINE	means the Yunex Traffic "EthicsPoint" Whistleblower hotline, hosted on behalf of the Yunex Traffic Group by NAVEX, and containing all the information related to each whistleblowing report received.
YUNEX TRAFFIC GROUP	means Yunex GmbH, and the Companies controlled by the latter, either directly or indirectly.

9 APPENDICES

Appendix No	Title
N/A	

10 REFERENCED DOCUMENTS AND PROCESSES

Doc No	Title
1	Directive (EU) no. 2019/1937 (“Whistleblower Directive”)
2	European Regulation 2016/679 for the protection of personal data (GDPR)
3	POL_1.1.1.1 Code of Ethics
4	POL_1.1.1 (Global Compliance Policy)
5	POL_1.1.4 (Business Partner and Third Party Intermediaries – Definition and Due Diligence Process)
6	POL_1.2.2.2 (Implementation of Yunex-internal regulations in Affiliated Companies)
7	POL_1.4.2 (Risk and Internal Control)
8	Mundys Group Anti-Corruption procedure
9	Mundys Group Human Rights Framework
10	Mundys Group Diversity, Equality and Inclusion Guidelines