

ORGANIZATION, MANAGEMENT AND CONTROL MODEL *GENERAL PART*

Pursuant to Legislative Decree June 8, 2001, No. 231 and subsequent amendments

ANNEX C - WHISTLEBLOWING POLICY -

INDEX

FOREWORD.....	4
DEFINITIONS AND ABBREVIATIONS.....	5
1. PURPOSE AND SCOPE OF THE PROCEDURE.....	6
2. OBJECT OF REPORTS.....	7
3. WHO CAN MAKE A REPORT.....	8
4. REPORTING CHANNELS.....	9
5. REPORTING PROCESS.....	11
5.1 WHO HANDLES REPORTS.....	11
5.2 EVALUATION OF REPORTS.....	12
5.3 REPORT VERIFICATION AND INVESTIGATION.....	13
5.4 OUTCOME OF THE INVESTIGATION AND REPORT CLOSURE.....	14
6. PROTECTIONS OF THE WHISTLEBLOWER, THE REPORTED PARTY, AND OTHERS.....	14
6.1 PROTECTION OF THE WHISTLEBLOWER.....	14
6.2 LIMITATIONS OF LIABILITY.....	15
6.3 PROTECTION OF THE REPORTED PARTY.....	15
6.4 PROTECTION OF OTHER PARTIES.....	15
7. CONFIDENTIALITY AND DATA PROTECTION.....	16
7.1 OBLIGATION OF CONFIDENTIALITY.....	16
7.2 PROCESSING OF PERSONAL DATA.....	16
7.3 RECORD KEEPING.....	17

FOREWORD

Baxi S.p.A. believes that adherence to the principles of its Code of Ethics is a shared responsibility for everyone: employees of Baxi S.p.A. and BDR Thermea Group (hereinafter BDRT), as well as anyone working on behalf of the company or the Group, and more broadly, all who collaborate or engage with the Group.

Baxi S.p.A. ensures compliance with both internal (e.g., policies, procedures, Model 231) and external legislation (national and European Union laws). It is committed to upholding and promoting the principles, rights, and duties outlined in its Code of Ethics, encouraging anyone who identifies potentially inappropriate, improper, or suspected conduct that violates internal or external legislation to report it to the relevant authorities.

Baxi S.p.A. strongly encourages cooperation in reporting misconducts or unacceptable behaviours, to promptly prevent such issues and take necessary action against those responsible.

GENERAL PRINCIPLES FOR MANAGING REPORTS

- ✓ *Autonomy and professionalism of those responsible for managing the report*
- ✓ *Confidentiality of information obtained during the reporting process*
- ✓ *Protection of the Whistleblower, the Reported Party, and any other involved from any retaliatory and/or defamatory actions*
- ✓ *Impartiality and independence of judgment of those handling reports*
- ✓ *Commitment to cooperate with relevant authorities in case of legal implications arising from reports*

DEFINITIONS AND ABBREVIATIONS

LEGISLATIVE DECREE 24/2023: Effective from March 30, 2023, it introduced new whistleblowing legislation in Italy. It consolidates the entire framework governing whistleblowing channels, and the protections granted to whistleblowers in both the public and private sectors, into a single regulatory text.

WHISTLEBLOWER: The natural person who reports information regarding violations encountered within the work environment.

REPORTED PARTY: The natural or legal person identified in the report as the subject of the violation or otherwise implicated in the reported misconduct.

FACILITATOR: An individual who assists a Whistleblower during the reporting process, working within the same environment and whose assistance must be kept confidential.

CASE MANAGER: The entity responsible for managing the reporting channel, specifically the *Risk and Compliance Team of BDRT*. The Case Manager handles the preliminary assessment of reports admissibility, monitors the reporting process, and communicates with the Whistleblower. The Case Manager fulfils the requirements set out in Article 5 of Legislative Decree 24/2023, as detailed in the Intercompany Service Agreement between BDRT and Baxi S.p.A.

INTERNAL SUPPORT BODY: A body within Baxi S.p.A., represented by the *Tax and Legal Team Manager*, serving as a liaison between the Case Manager and the Investigator Team, ensuring the necessary autonomy and expertise as required by legislation.

INVESTIGATOR TEAM: Teams or corporate functions involved in examining the report, depending on its nature (e.g. HR, Supervisory Body, etc.).

SUPERVISORY BODY: Team appointed under Legislative Decree 231/2001.

RESPONSE: Communication to the Whistleblower, providing information on the actions taken or planned due to the report.

RETALIATION: Any act, behaviour, or omission—including attempts or threats—resulting from a report, referral to judicial or accounting authorities, or public disclosure, that causes or may cause direct or indirect harm to the Whistleblower or the individual who submitted the report.

PUBLIC DISCLOSURE: Making information about violations available to the public through print, electronic media, or other means capable of reaching a wide audience.

1. PURPOSE AND SCOPE OF THE PROCEDURE

This procedure aims to define the process for managing reports in compliance with **Legislative Decree 24/2023**, ensuring the protection of individuals who report violations of national or EU laws, as further detailed below.

The procedure specifically governs how reports, whether submitted internally or externally to Baxi S.p.A., are received and processed to address any form of misconduct or unethical behaviour.

Its goal is not only to prevent potential irregularities within the organization but also to foster a corporate culture that actively fights illegal activities, encouraging the responsible involvement of all employees and collaborators of Baxi S.p.A.

WHERE CAN I FIND THE POLICY?

This Policy is available on the corporate website and intranet, where a link provides access to the reporting platform. Additionally, a printed copy can be obtained upon request.

2. OBJECT OF REPORTS

Object of the reports are inappropriate or improper conduct and alleged violations, including both overt and suspected misconduct, such as those related to:

- **The Code of Ethics of Baxi S.p.A.**
- **The Organizational, Management and Control Model under Legislative Decree 231/2001**
- **Group Policies and Internal Procedures**

Violations that may be reported within Baxi S.p.A. under Legislative Decree 231/2001 include, but are not limited to:

- A. **Illegal conduct relevant to Legislative Decree 231/2001;**
- B. **Violations under EU and domestic laws related to:**
 - a. Public procurement
 - b. Financial services, products, and markets, including prevention of money laundering and terrorist financing
 - c. Product safety and compliance
 - d. Transport security
 - e. Environmental protection
 - f. Radiation protection and nuclear safety; food and feed safety; animal health and welfare
 - g. Public health
 - h. Consumer protection
 - i. Privacy, personal data protection, and network and information system security;
- C. **Acts or omissions that affect the financial interests of the European Union**, as outlined in Article 325 of the Treaty on the Functioning of the European Union and relevant EU legislation;
- D. **Acts or omissions that impact the internal market**, as described in Article 26 par.2 of the Treaty on the Functioning of the European Union;
- E. **Actions or behaviours** that undermine the objectives or purpose of **provisions in EU legislation** in the sectors listed above.

The report should concern:

- Violations that have been or are likely to have been committed, based on well-founded and substantiated suspicions.
- Violations that have not yet occurred but which the Whistleblower believes may occur, based on well-founded and substantiated suspicions.
- Actions intended to conceal the aforementioned violations.

BAXI S.P.A.	ORGANIZATION, MANAGEMENT AND CONTROL MODEL	Rev.	Page
	ANNEX C - WHISTLEBLOWING POLICY	05/2024	7 of 17

Exclusions from Reporting:

- Disputes, claims, or requests concerning personal interests of the Whistleblower.
- Reports concerning individual employment or collaboration relationships between the Whistleblower and the Company, or with hierarchically superior figures.
- Aspects of the reported person's private life with no direct or indirect connection to business or professional activities.

In addition, the following are not permitted:

- Specious, defamatory, or slanderous reporting aimed solely at harming the Reported Party.
- Allegations concerning violations that the Whistleblower knows to be unfounded.

Examples of reportable conduct (non-exhaustive list):

- Promising or giving of a sum of money or granting of other benefits (e.g., gifts, hospitality, meals, and dinners not permitted under the current company procedure) to a public official or a person in charge of a public service as compensation for the performance of their duties or for carrying out an act contrary to their official duties.
- Tampering with documents, manipulating or falsifying business records to gain undue advantages or deceive authorities.
- Offering or providing money or other benefits (gifts, hospitality, meals, and dinners not permitted under the current company procedure) not permitted under the current company procedure aimed at bribing customers or suppliers.
- Violations of personal data protection through unauthorized collection, storage, or processing of customer, supplier, or other personal data.
- Implementing IT systems designed to bypass European legislation on network and data security.

3. WHO CAN MAKE A REPORT

Reports can be made by the following parties:

- Employed workers, including those engaged in:
 - Part-time, intermittent, fixed-term, temporary and permanent agency work, apprenticeship, and occasional work.
 - Occasional services (as per Article 54-bis of Decree Law No. 50/2017, converted into Law No. 96/2017);
- Self-employed individuals, including those:
 - Under a work contract (Article 2222 of the Italian Civil Code).
 - In a collaborative relationship (as referred to in Article 409 of the Italian Code of Civil Procedure), such as agency, commercial representation, and other collaborations that result in the provision of continuous and coordinated work, predominantly personal, even if not of a subordinate nature.

- In a collaborative relationship that involves exclusively personal and continuous work, with the manner of performance organized by the customer.
- Employees working for those providing goods or services or who perform works for the Company.
- Freelancers and consultants who provide services to the Company.
- Volunteers, trainees and interns, including both paid and unpaid, working within the Company.
- Shareholders and individuals with roles in administration, management, control, supervision, or representation, even when these functions are performed on a *de facto* basis (e.g., members of the Board of Directors or Supervisory Body).

4. REPORTING CHANNELS

The Decree requires private sector entities, after consulting with trade union representatives or organizations, to establish their own reporting channels, ensuring the confidentiality of the identities of the Whistleblower, the individuals involved, and any persons mentioned in the report, as well as the content of the report and its related documentation, including through the use of encryption tools.

If a Whistleblower has reasonable suspects that unlawful conduct has occurred or may occur, they may use the reporting channels to submit a report.

The Reporting Channels:

- *Online reporting platform (Integrity Line) accessible at bdrthermeagroup.integrity.com*
- *In-person meeting to be arranged within a reasonable time to be held with the Internal Support Body (except as provided for conflict-of-interest situations, see below)*
- *The ANAC (Italian National Anti-Corruption Authority) dedicated portal, for cases where conditions for making an external report are met*
- *Public disclosure*

Detailed **operational instructions** for submitting a report through the channel provided by Baxi S.p.A. are outlined below.

❖ REPORTING PLATFORM

Reports can be submitted through the **reporting platform** at the following **link**:
bdrthermeagroup.integrity.com

On the platform, the Whistleblower must follow these steps:

- Click on the "Make a Report" button.
- Select the recipient company from the available options.

BAXI S.P.A.	ORGANIZATION, MANAGEMENT AND CONTROL MODEL	Rev.	Page
	ANNEX C - WHISTLEBLOWING POLICY	05/2024	9 of 17

- Indicate whether they work for BDRT and specify the company and country where the reportable event occurred, if applicable.
- Provide a detailed description of the event being reported.
- Upload any relevant attachments, such as pictures, videos, or documents.

The platform also allows for **oral reports** by recording a voice message. To do this, in the "Make a Report" page, the voice message option in the upper right corner must be selected. The requested fields, referring to the contents of the **voice message**, must be filled in.

After completing the report, **the Whistleblower has the option to submit it anonymously or provide personal information** such as:

- Name,
- Phone number,
- Email address.

Upon submitting the report, the Whistleblower can choose to remain available for further information or clarifications by **opening a "Secure Inbox"**.

This option is available whether the report is submitted anonymously or if contact details are provided.

To create the "Secure Inbox", the Whistleblower must choose a password that meets the platform security requirements. A report number will be assigned upon successful creation of the inbox.

To access the "Secure Inbox", the Whistleblower must follow these steps:

- Log in to the reporting system;
- Click on "Secure Inbox";
- Enter the assigned report number and the password you set when creating the inbox.

Once logged in, the Whistleblower can decide whether to maintain anonymity for future communications.

Through the "Secure Inbox", the Whistleblower can:

- Provide additional details regarding the report;
- Respond to any follow-up questions.

In cases where a report is received by any function other than the Case Manager or through a different channel, the Case Manager will be promptly notified by the Internal Support Body, entering the report into the WB Platform. A notification will be sent to the Whistleblower (if known) confirming its transmission.

❖ REPORTING VIA IN-PERSON MEETING REQUEST

The Whistleblower has the option to report a violation by requesting an **in-person meeting** with the **Internal Support Body**, which will be scheduled within a reasonable timeframe. This meeting can be requested through the telephone line, air mail, e-mail, or the reporting platform, specifying that the

BAXI S.P.A.	ORGANIZATION, MANAGEMENT AND CONTROL MODEL	Rev.	Page
	ANNEX C - WHISTLEBLOWING POLICY	05/2024	10 of 17

purpose of the meeting is to make a report. After the in-person meeting, the Whistleblower will enter the report into the Platform, following the procedure outlined in this document.

❖ EXTERNAL REPORTING TO ANAC

The Whistleblower may **use the external reporting channel of ANAC** (Italian National Anti-Corruption Authority) **exclusively** in the following cases:

- There is no internal reporting channel available in the workplace, or, if mandatory, it has not been activated, or, if activated, it does not comply with the provisions of Article 4 of the Decree;
- No action has been taken in response to an internal report already submitted;
- The Whistleblower has reasonable grounds to believe that an internal report would not be effectively addressed or may lead to retaliation;
- The Whistleblower has reasonable grounds to believe that the violation may pose an imminent or clear threat to the public interest.

An external report to ANAC can be made at the following link: Whistleblowing - www.anticorruzione.it

❖ PUBLIC DISCLOSURE

The Whistleblower may directly make a **public disclosure** when:

- They have already submitted an internal and external report, or have made an external report directly, and no response has been received within the prescribed time frame regarding the measures planned or taken to address the report;
- They have reasonable grounds to believe that the violation may pose an imminent or clear threat to the public interest;
- They have reasonable grounds to believe that external reporting may result in retaliation or may not be effectively followed up due to the specific circumstances of the case, such as situations where evidence may be concealed or destroyed, or where there is a well-founded concern that the recipient of the report may be colluding with or involved in the violation.

5. REPORTING PROCESS

5.1 WHO HANDLES THE REPORTS

In accordance with applicable legislation and to ensure uniform management of reports across the Group, BDRT has centralized the management of the reporting channel. Specifically, these functions have been entrusted by Baxi S.p.A. — through a dedicated Intercompany service agreement — to the **Corporate Risk & Compliance Function of BDR Thermea**, which, under this Policy, acts as the **Case Manager**. The Case Manager is the internal body responsible for managing the reporting channel and the obligations under

BAXI S.p.A.	ORGANIZATION, MANAGEMENT AND CONTROL MODEL	Rev.	Page
	ANNEX C - WHISTLEBLOWING POLICY	05/2024	11 of 17

Article 5 of Legislative Decree 24/2023. The Case Manager is responsible for conducting preliminary verification on the admissibility of reports, as well as for monitoring and responding to reports through the reporting platform.

To ensure so-called '**proximity**', the designated reporting channel manager is supported by the **Internal Support Body**, represented by the **Tax and Legal Team Manager**, to ensure the participation and involvement of individuals within the subsidiary to which the report refers.

For reports concerning violations that **fall within the scope of the Organization, Management and Control Model under Legislative Decree 231/2001**, the Internal Support Body of Baxi S.p.A. immediately involves the Supervisory Body, which will take on the role of the **Investigator Team** according to this Policy.

For reports that **do not fall within** the scope of the Organization, Management, and Control Model under Legislative Decree 231/2001, the Internal Support Body will involve the **relevant corporate functions** (e.g., Human Resources), which will then assume the role of the competent Investigator Team.

If the reporting manager faces a conflict of interest concerning a specific report (for example, if they are the Reported Party or the Whistleblower), this will be considered a valid condition for making an external report to ANAC.

5.2 EVALUATION OF REPORTS

The Corporate Risk & Compliance Function of BDRT, in its role as Case Manager, is responsible for handling reports submitted through the designated channels, with the aim of conducting a preliminary assessment of their relevance. This assessment may require **requesting clarifications or additional information** from the Whistleblower, either through their personal secure area or via other appropriate channels. In these activities, to ensure what is referred to as "proximity," the channel manager is supported by the Internal Support Body.

The report is always analysed in full compliance with legal principles and applicable legislation, including those relating to personal data protection. **Within seven days of receiving the report**, the Whistleblower will be notified of its receipt.

If the report is deemed **irrelevant or not actionable** (e.g., insufficiently supported by evidence, clearly unfounded, or related to conduct or facts not relevant to this procedure, or overly vague), it will be **filed** by the Case Manager, who will notify the Whistleblower accordingly.

After completing the preliminary assessment, the Case Manager will **dismiss the report** if it is found to:

- Be related to a simple personal grievance;
- Be clearly unfounded;
- Be overly vague: in this case, before proceeding with dismissing, the Case Manager will contact the Whistleblower (via the appropriate channel) to gather additional useful information or will independently verify the facts described, possibly involving the Internal Support Body and/or

External Parties. The report will only be archived if no further information is provided or if the additional information is still deemed insufficient.

In all the cases described above, the Whistleblower will be informed in writing by the Case Manager, through the platform, of the report dismissal and the reasons for it.

If, on the other hand, the Case Manager receives or collects additional supporting evidence for the report, or if the facts described in the report are found to be sufficient and well-founded from the outset, an investigation will be initiated.

5.3 REPORT VERIFICATION AND INVESTIGATION

If, after the preliminary assessment, the Case Manager considers the facts described in the report to be credible and relevant, **the preliminary investigation begins.**

The activities carried out during this phase will adhere to the timelines set by applicable legislation and be conducted according to the principles of independence, professionalism, and confidentiality.

The Case Manager, supported by the Internal Support Body, involves the relevant business functions in the investigation and may also engage the assistance of External Experts if necessary.

The process ensures proper conduct through:

- The collection of documents and information;
- Involvement of external parties (in cases where technical expertise from third-party professionals is required) or other business functions, which are obligated to collaborate with the Case Manager and the Internal Support Body;
- Interviews with other internal/external parties, as needed.

The investigation is conducted in accordance with the following principles:

- Necessary measures are taken to protect the identity of the Whistleblower and those involved;
- The inquiry is carried out by qualified individuals, and all activities are properly documented and archived;
- All parties involved in the investigation maintain the confidentiality of the information, unless otherwise required by law;
- Verifications are conducted while ensuring appropriate measures are in place for the collection, use, disclosure, and storage of personal information, balancing the needs of the investigation with privacy protection;
- Appropriate actions are taken to manage any conflicts of interest, particularly if the report concerns the recipient.

5.4 OUTCOME OF THE INVESTIGATION AND REPORT CLOSURE

At the conclusion of the preliminary investigation, and in any case **no later than three months after the seven-day period following the report's submission**, the Case Manager shall inform the Whistleblower of the findings.

Within three months from the date of acknowledgment of receipt, or if no acknowledgment is provided, within three months after the seven-day period following the submission of the report, the recipient shall provide feedback to the Whistleblower, notifying them of one of the following:

- The **dismissal** of the report, with an explanation for the decision, or
- The **validity** of the report, with its referral to the relevant internal bodies for follow-up, or
- A summary of the investigative activities carried out, those still pending (in cases requiring a longer investigation), and any actions taken (including measures adopted or referral to the competent authority).

6. PROTECTIONS OF THE WHISTLEBLOWER, THE REPORTED PARTY, AND OTHERS

6.1 PROTECTION OF THE WHISTLEBLOWER

Whistleblowers must not be subjected to any form of retaliation. The law explicitly states that Whistleblowers cannot be sanctioned, demoted, dismissed, transferred, or subjected to any other organizational measure that could have, directly or indirectly, negative consequences on their working conditions, or result in discrimination or retaliation against them.

The reasons behind the Whistleblower's decision to report, file a complaint, or make a public disclosure are irrelevant to the protection they receive.

In compliance with national and international legislation on the protective measures for Whistleblowers, Baxi S.p.A. and BDRT guarantee the **confidentiality** of the Whistleblower's identity, and the information reported throughout the entire reporting process.

From the moment a report is received, the Case Manager is responsible for ensuring the confidentiality of the Whistleblower and for protecting any other information that could directly or indirectly reveal the identity of the person who made the report. This obligation remains even if the report is later found to be unfounded or irrelevant. It is mandatory for all individuals involved in handling reports to safeguard this confidentiality.

Whistleblower protection also applies in cases where the report, notification to judicial authorities, or public disclosure of information occurs under the following circumstances:

- a) When the legal relationship has not yet begun, if the information about violations was obtained during the selection process or other pre-contractual stages;
- b) During the probationary period;

BAXI S.p.A.	ORGANIZATION, MANAGEMENT AND CONTROL MODEL	Rev.	Page
	ANNEX C - WHISTLEBLOWING POLICY	05/2024	14 of 17

c) After the termination of the legal relationship, if the information about violations was acquired during the relationship.

6.2 LIMITATIONS OF LIABILITY

The Decree **excludes the punishability** of a Whistleblower who discloses or disseminates information about violations protected by confidentiality obligations, copyright law, or personal data protection, or who discloses or disseminates information about violations that harm the reputation of the person involved or reported, provided that, at the time of the disclosure or dissemination, there were reasonable grounds to believe that such disclosure or dissemination was necessary to expose the violation, and the reporting, public disclosure, or notification to the judicial or accounting authority was made in the required manner.

When these conditions are met, all further liability, including civil or administrative liability, is also excluded. Moreover, unless the act constitutes a crime, liability, including civil or administrative liability, is excluded for the acquisition or access to information concerning the violations.

It is clarified, however, that criminal liability and any other liability, including civil or administrative liability, is not excluded for actions, omissions, or behaviors that are unrelated to the reporting, notification to judicial or accounting authorities, or public disclosure, or that are not strictly necessary to reveal the violation.

6.3 PROTECTION OF THE REPORTED PARTY

To prevent prejudicial situations in the workplace, Baxi S.p.A. adopts the same protective measures to **safeguard the confidentiality** of the Whistleblower, also to **the alleged responsible party** (hereinafter "Reported Party") **for the violation**. The only exception is where Baxi S.p.A. is legally required to disclose the identity of the Reported Party (e.g., upon request by judicial authorities).

Furthermore, Baxi S.p.A. guarantees the Reported Party the following rights:

- The right to be informed, within a reasonable period of time, of the allegations made against them and of any disciplinary actions taken against them;
- The right to defend themselves by presenting their version of events and any evidence useful in contesting the allegations.

In compliance with legal provisions or in response to specific requests from public authorities (e.g., Administrative Authorities), the Reported Party's personal data may be transmitted to such entities.

6.4 PROTECTION OF OTHER PARTIES

The protective measures outlined above also extend to **any third parties involved** in the reporting process, as specified below:

BAXI S.p.A.	ORGANIZATION, MANAGEMENT AND CONTROL MODEL	Rev.	Page
	ANNEX C - WHISTLEBLOWING POLICY	05/2024	15 of 17

- Individuals who provided support to the Whistleblower during the reporting process (so-called 'facilitators');
- Persons within the same work environment as the Whistleblower, the individual who filed a complaint with the judicial or accounting authority, or the person who made a public disclosure, and who have a stable emotional or kinship relationship with them, up to the fourth degree;
- Colleagues of the Whistleblower or the individual who filed a complaint with the judicial or accounting authority, or who made a public disclosure, who work in the same environment and have an ongoing and regular relationship with that individual;
- Entities owned by the Whistleblower or the individual who filed a complaint with the judicial or accounting authorities or made a public disclosure, or entities in which these individuals work, as well as entities operating in the same work environment as the aforementioned individuals.

7. CONFIDENTIALITY AND PERSONAL DATA PROTECTION

7.1 DUTY OF CONFIDENTIALITY

Baxi S.p.A. **ensures the confidentiality of each report** and the information contained within it, including the identity of the Whistleblower, the Reported Party, the Facilitators, and any other persons involved. Their identities will not be disclosed to anyone other than those responsible for receiving or handling the reports. Confidentiality protection extends to the identities of all individuals involved or mentioned in the report until the conclusion of the proceedings initiated as a result of the report, with the same safeguards provided to the Whistleblower.

7.2 PROCESSING OF PERSONAL DATA

All processing of personal data, including communication between competent authorities, must be carried out in accordance with Regulation (EU) 2016/679 (GDPR). The communication of personal data by EU institutions, bodies, or agencies must comply with Regulation (EU) 2018/1725. BDRT manages reports and related data processing in compliance with the principles of necessity, proportionality, and lawfulness as provided by the GDPR. The investigation and resolution of reports may involve the transfer of personal data to Baxi S.p.A., which will act as Joint controller the data processing. For further details on data processing, please refer to the full privacy policy, available on the platform at the following link: bdrthermeagroup.integrity.com.

Private sector entities that share resources for receiving and handling reports must transparently establish their respective responsibilities for complying with data protection obligations through an internal agreement.

7.3 RECORD KEEPING

Reports and related documentation shall be retained for the time necessary to process the report and in any case **no longer than five years** from the date the final outcome of the reporting procedure is communicated, in compliance with confidentiality obligations and relevant data protection legislation.