

  
**POLICY**  
**GEN-POL-008 v 2.0**

**TITLE**  
**WHISTLEBLOWING**

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## 1. PURPOSE

The purpose of this Policy is to support a comprehensive set up of Whistleblowing System including functionality description and operating procedure.

The Company objectives expected to be achieved by the Whistleblowing System implementation are:

- To detect and prevent misconduct and breaches of laws and regulations,
- To improve law enforcement by establishing effective, confidential and secure reporting channels to effectively protect whistleblowers from fear of retaliation,
- To protect and enable whistleblowers by helping them to raise concerns confidently without fear of retaliation, by ensuring anonymity.

## 2. SCOPE

The Whistleblowing System protection not only applies for employees who report their concern, or job applicants, or former employees, but it applies broadly for all Company Affiliates and stakeholders.

“**Affiliate**” shall mean any entity that directly or indirectly is controlled by Genenta Science SpA. Control means ownership, directly or through one or more Affiliates, of fifty percent (50%) or more of the shares of stock entitled to vote for the election of directors, in the case of a corporation, or fifty percent (50%) or more of the equity interests in the case of any other type of legal entity, or any other arrangement whereby a party controls or has the right to control the governing body of the entity.

### **Affiliate Type**

Affiliates under the SEC independence rules include the following:

- i. An entity that has control over the Company, or over which the Company has control [Subsidiary], or which is under common control with the Company [ Sister], [Employee Benefit Plan], including the Company's parents and subsidiaries.
- ii. An entity over which the Company has significant influence, unless the entity is not material to the Company [Investee (Downstream)].
- iii. An entity that has significant influence over the Company, unless the Company is not material to the entity [Investor (Upstream)].
- iv. Not applicable (iv. only applies to attest clients in an investment company complex)

The options in the dropdown are as follows:

Parent [i] -

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Subsidiary [i]

Investee (Downstream) [ii]

Investor (Upstream) [iii]

Sister [i]

Portfolio Company [i]

Employee Benefit Plan [i]

Investment Company [iv A, iv C]

Investment Advisor [iv A, iv B1]

Sponsor [iv A, iv B1]

Fund [iv B2]

Fund Administrator [iv B2]

Transfer Agent [iv B2]

Custodian [iv B2]

Underwriter [iv B2]

Attest Client

**Type of Individual/Entity**

In addition to entities that meet the definition of an affiliate, include all individuals or entities that are covered by the independence rules for attest clients and any individuals or entities that are to be tracked within Salesforce for ongoing monitoring of their potential impact on independence. The following terms are provided in the drop down box in to assist in categorizing the individuals and entities:

Directors - Directors of the attest client or its affiliates

Officers - Officers of the attest client or its affiliates

Financial Reporting Oversight Role - Include any person with a financial reporting oversight role (Note - do not duplicate Directors and Officers). "Financial reporting oversight role" means a role in which a person is in a position to or does exercise influence over the contents of the financial statements or anyone who prepares them, such as when the person is a member of the board of directors or similar management or governing body, chief executive officer, president, chief financial officer, chief operating officer, general counsel, chief accounting officer, controller, director of internal audit, director of financial reporting, treasurer, or any equivalent position.

Stockholder (>=5%) - Any beneficial owner, of the Company or its affiliates, as defined

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under Section 13D of the Securities Exchange Act of 1934 ("Act") that is required to file Schedule 13D or 13G with the SEC under Section 12 of the Act (i.e. 5% owner). Include 1) individuals that have not already been identified as a Director, Officer, Financial Reporting Oversight Role or Person in Decision Making Capacity and 2) entities that have not already been identified as an Affiliate.

Person in Decision Making Capacity - Any other person related to the Company or its affiliates with a decision making capacity (such as Directors, Officers, or Substantial Stockholders) who have not been previously defined as a Director, Officer or Stockholder ( $\geq 5\%$ ).

**“Stakeholders”** A stakeholder has a vested interest in a company and can either affect or be affected by a business' operations and performance. Typical stakeholders other than employees are investors, customers, suppliers, communities, governments, or trade associations. An entity's stakeholders can be both internal or external to the organization.

**“Protection”** applies to reports of wrongdoing relating to EU applicable law (Directive (EU) 2019/1937 of the European Parliament) and US applicable law (e.g. Whistleblower Protection Act of 1989, Sarbanes–Oxley Act (SOX) of 2002), such as tax fraud, money laundering or public procurement offences, product and road safety, environmental protection, public health and consumer and data protection.

### 3. RESPONSIBILITY

#### 3.1 Genenta Science Responsibility

Genenta Science is responsible to have adopted an organization and management model named “Genenta Organization and Management Model 231”, the “Model 231”, together with the “Code of Ethics” and “Conduct Code” to prevent certain crimes for which the Company can be held liable.

Genenta Science is also responsible to have appointed the Supervisory Body (“Organismo di Vigilanza” or “ODV”) to oversee the Model 231 application and continuous improvement and update.

Genenta Science is responsible for the Model 231 dissemination and for the actions taken for making the Model 231 effective, among which, the Whistleblowing System implementation is mandatory.

In doing so, Genenta Science has deemed appropriate to engage a third party authorized service provider with the proper standing and broad experience to manage the whistleblowing process and has determined the “most suitable” subjects to receive and follow up on reports as set forth in the Roles section.

#### 3.2 Employees Responsibility

Employees who believe they are aware of any violation regarding law or the Organizational

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Management and Control Model 231/01 provision including the Code of Ethics and/or Conduct Code are expected and encouraged to report their concerns. Employees have many ways in which they can report a concern or incident. They may discuss it with their manager, the ODV and the General Manager. Employees may also contact Lighthouse Services, by the Whistleblowing System Syntrio. Such reports may be made confidentially and anonymously.

Employees should understand, however, that nothing in this policy (nor any other Genenta Science policy or agreement) limits, impedes, or restricts an employee's ability to contact, report to, or file a charge or complaint with, the U.S. Securities and Exchange Commission, any other U.S. federal, state, or local government agency or commission or any European Union or Republic of Italy government agency or commission ("Government Agencies"). This policy also does not limit your ability to participate and/or assist in any investigation or proceeding that may be conducted by any Government Agencies, including providing documents or other information without notice to the Genenta Science. Nothing in this policy limits your right to seek and/or receive an award for information provided to any Government Agencies or prohibits you from providing truthful information in response to a subpoena or other legal process.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and should not be submitted using this service

## 4. BACKGROUND

Whistleblowers are vital for maintaining an open and transparent society, as they expose misconduct or hidden threats. To ensure that they are better protected against negative consequences, Genenta Science decided to established this whistleblower hotline through Lighthouse Services LLC, Inc. for a specific purpose: to strengthen the anonymity of the process and to increase and ease the whistleblowers reporting fraud, unlawful, unethical and other types of improper behavior.

## 5. POLICY

Genenta Science has established this whistleblower hotline policy for a specific purpose to report fraud, unlawful, unethical and other types of improper behavior. This policy and is NOT a substitute for routine communications within Genenta Science organization between employees and their supervisors and managers, particularly as to workplace duties. Likewise, it does not replace communications about benefit issues or other job related issues. This whistleblower hotline policy presents an additional communication tool for specific types of situations and it is provided because Genenta Science believes that it is a good business practice to do so.

### 5.1 The Syntrio Case Management System (CMS) software tool

The CMS is a software that serves as a tracker and storage system for all the hotline reports and serves also to manage hotline activity and investigations. The CMS is part of the Syntrio platform provided as web service to Genenta Science SpA by Lighthouse Service LLC. The

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system can track every issue from report receipt through resolution, optimizing investigations, reducing administrative oversight, ensuring due diligence and creating an audit trail.

## 5.2 Roles

The CMS allows potentially unlimited users in the system, both Administrators (who can access every report) and Investigators (who have limited access to reports assigned to them).

**Primary Contact** – The individual with primary responsibility for the hotline program that by emailing [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com), manages who the designated recipients for reports are and inform the Authorized Service Provider of any changes. They Primary contact also receives email notification of any upgrades to the services, administrative matters and program correspondence. Genenta Science primary contact is: Barbara Regonini: [barbara.regonini@genentascience.com](mailto:barbara.regonini@genentascience.com).

**Designated Recipients** – All reports are sent via email to the designated recipients who are: Riccardo Pontremoli ODV Member: [riccardo.pontremoli@galaw.it](mailto:riccardo.pontremoli@galaw.it); Carlo Lamberti ODV Chairman: [carlo.lamberti@studio-lamberti.it](mailto:carlo.lamberti@studio-lamberti.it);

**Case Management System (CMS) Administrator** - The CMS Administrator has unrestricted access to Genenta Science entire online database and is responsible for updating information related to the database. In addition, he also assigns reports to CMS Investigators and add new users. The CMS Administrator is Carlo Lamberti ODV Chairman: [carlo.lamberti@studio-lamberti.it](mailto:carlo.lamberti@studio-lamberti.it)

**Case Management System (CMS) Investigator** – The Investigator has limited access to the CMS and can investigate, track progress, dialog, and upload files to reports he has been assigned by the Administrator. The CMS Investigator is Carlo Alberto Nicchio Audit Committee President: [CarloAlberto.Nicchio@studionicchio.it](mailto:CarloAlberto.Nicchio@studionicchio.it)

## 5.3 Standards of behavior expected of employees

The employee's reaction to a particular situation in the workplace is one of the top factors that create a positive work environment. And like all other skills and potentials, good behaviors get the best from the employees.

Genenta Science **Code of Ethics and the Conduct Policy** summarize expected ethics principles behaviors for all employees to be applied in all department or business unit.

The Company has adopted **The Organization, Management and Control Model** pursuant the Italian Legislative Decree 231/01 (**Model 231**) to prevent its liability in case of relevant crimes identified in this document.

All those behaviors that subject the Company to such risks are considered **misconducts** that should be reported and that determines the application of the **Disciplinary Policy**.

## 5.4 Concern Reporting or Incident Witness

Employees who believe they are aware of a violation are expected and encouraged to report

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their concerns.

Employees have many ways in which they can report a concerns or incidents: they may discuss it with their internal report: the Department Responsible Manger, the General Manager, the ODV or they can submit reports by the Syntrio system.

If an employee decides to report by the Whistleblowing Syntro System he/she should follow this policy, if the employee decides to report internally, he/she should follow the Conduct Policy.

The Syntrio tool is external to Genenta Science systems and is managed by Lighthouse Service LLC with a mailing address of 1710 Walton Rd., Suite 204, Blue Bell, PA 19422.

The whistleblower can access via:

- **Website:** <https://www.lighthouse-services.com/genenta>
- **Anonymous Reporting App: Keyword: genenta**
  - Detailed instructions [here](#) (CTRL + clic to open the link)
- **Toll-Free Telephone:**
  - Direct Dial**
    - **English speaking USA and Canada: 833-950-4534**
    - Spanish speaking USA and Canada: **800-216-1288**
    - French speaking Canada: **855-725-0002**
    - Spanish speaking Mexico: **01-800-681-5340**
  - AT&T USA Direct**
    - **All other countries: 800-603-2869** (must dial country access code first [click here](#) (CTRL + clic to open the link for access codes and dialing instructions) -> [Worldwide Calling Instructions and Access Codes](#))
- **E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)

On first access, the whistleblower must read a document explaining how the whistleblowing software works. **See Annex 1 of this Policy**

Once the report has been entered, the Administrator (ODV Supervisory Body) will take care of the matter and use the electronic tool to communicate with the whistleblower.

**The report may be sent using also the following communication email channel:**  
[odvgenenta@genenta.com](mailto:odvgenenta@genenta.com)

**Or by post to:**

Organismo di Vigilanza (Supervisory Body):  
c/o Genenta Science Spa  
Via Olgettina, 58  
20132 Milano (MI), Italy

Such reports may be made confidentially and anonymously.



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Employees who report concerns in good faith will not be subjected to retaliation and set out the consequences of retaliation

Genenta Science will not tolerate any retaliation against employees who raise genuine concerns. Such retaliation is cause for disciplinary action up to and including termination of employment.

Employees are not protected from the consequences of their own misconduct by using the hotline and they will face disciplinary action if they provide false or deliberately misleading information.

## 6. PROCESS

Concerns and Incidents reported may be subjected to **Pre Investigation Process** based on the Administrator and Recipient evaluation, in order to find, where applicable, informal solutions.

### 6.1 Early Resolution

The first part of the process is an informal stage where the report Recipient may:

- Hold an initial meeting with the employee
- Discuss any underlying issues and potential solutions
- Provide guidance on acceptable standards of conduct and behavior
- Set targets and timescales for improvement where appropriate
- Arrange review meetings

The outcome of these meeting(s) will be confirmed by the Recipient in writing within 7 calendar days.

At the end of the agreed timescales, where the required improvement has been met, the Recipient will confirm that no further action will be taken.

Where the required improvement(s) are not met, the Recipient will advise the employee that the formal approach will be initiated. An investigation will be undertaken using the **Investigation Policy and Process**.

### 6.2 Formal Approach

In cases where the concern is more serious and cannot be managed under Early Resolution, or where Early Resolution has not worked, an investigation under the **Investigation Policy and Process** will be arranged. Upon completion of the investigation, an investigation report will be submitted to the Administrator recommending one of the following outcomes:

- No further action as the allegation is not upheld

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- Formal conduct hearing

Written notification of the next steps will be sent to the employee within 7 calendar days of receiving the final investigation report

### 6.3 Formal Hearings

If the outcome indicates that the employee is referred to a formal conduct hearing, the employee will be invited to attend and present the case at a hearing.

This is set up for an independent panel of ODV and Audit Committee members to consider the alleged conduct issue which has been raised, so they can make a decision about the issue from the evidence presented.

After the hearing, the outcome will be confirmed in writing, with one of the following outcomes:

- No case to answer
- Learning outcomes and / or
- A formal conduct sanction

In case of formal sanction, a **Designated Panel** of subjects is involved (as provided by the **Conduct Policy**) to evaluate and determine the type of disciplinary measure to be applied based on the **Disciplinary Policy**.

At the end of the investigation, the CMS Administrator close the incident in the Case Management system and anonymize any collected personal data, if necessary.

For reporting and archiving purposes, all cases remain within the whistleblower system.

### 6.4 Maintaining relationships

There is an expectation that people will continue to work together at all stages wherever possible. The Administrator has the duty to identify a responsible manager to support the employee in all the procedure stages avoiding any potential conflicts.

### 6.5 Failure to Engage

There may be occasions where the employee feels unable to attend a hearing. Where this is for health reasons, occupational health advice will be obtained to consider when the employee will be in a position to do so or if there are alterations to the process which can be made to support the employee attendance. If the employee intends to be supported or represented then the availability of all parties will be considered, in order to agree on a suitable date for all parties.

Where the employee decides not to attend and there is no reasonable explanation for this, the employee will be offered a second meeting and if he/she fails to participate, the panel will consider any reasons for this and whether to progress the hearing in his/her absence.

### 6.6 Grievances / Bullying and Harassment Complaints

If the employee raises a grievance or bullying and harassment complaint during the conduct process, the process may be temporarily suspended in order to deal with the grievance or complaint. Where the grievance or complaint and matters under consideration are related, it

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may be appropriate to deal with both issues at the same time.

Complaints of bullying and harassment during the conduct process, or at the end of that process, must also be reported using the channels outlined in this policy. The Recipient will then be required to manage them with the same guarantees provided in this policy.

## **7. ADDITIONAL GENERAL WHISTLEBLOWING POLICY INFORMATION**

### **7.1 Duty to inform**

Genenta Science is responsible to provide information on the internal reporting process as well as on the reporting channel(s) to the competent authority. This information must be easily understandable and accessible.

### **7.2 Processing Time**

The Administrator is obliged to confirm receipt of the report to the whistleblower **within 7 days**. The whistleblower must be informed of any action taken within three months, the status of the internal investigation and its outcome.

### **7.3 Data Storage**

All reports received are segregated and stored in the system so that they can be used as evidence, if necessary. All whistleblowing documentation will be kept only for the time necessary.

### **7.4 Usage of Internet or conventional mail to make a report**

Confidential reports can be made either via the Internet or using conventional mail or post as set forth above.

If a whistleblower does not have access to the Internet or is not good at using a computer, he/she can send a letter by post

Emails and post letter must be labelled as confidential.

### **7.5 Anonymous reports**

The employee can choose to make an anonymous report or can decide to be identifiable. However, even if anonymous reports are accepted, the Company believes that investigations can be handled more effectively if the whistleblower's identity is known.

When the employee makes a report using the web form, a PIN code is provided. This PIN will allow the employee to call the CMS process, access the web form and access to the report submitted to add further details or answer questions that may be put to the whistleblower by the person handling the report and to provide further information that may be helpful in resolving outstanding issues. It is strongly recommend to consult the site according to the timing notified to answer any questions. Even in case of anonymous report, it is possible to enter into an "anonymous dialogue" with the person in charge of investigating the case.

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## **7.6 Events that CAN be reported**

Genenta Science's CMS procedure can be used by employees and third parties to report practices or behavior which, in good faith, are considered inappropriate or do not comply with the law, Genenta's Code of Ethics and Code of Conduct or other Company rules.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

## **7.7 Events that CANNOT be reported**

Genenta's whistleblowing procedure cannot be used to report events leading to an imminent threat to life or property. Reports submitted through this service may not receive immediate response. If assistance in an emergency is needed, please do not hesitate to contact the competent authorities and bodies.

If not sure whether what you saw or heard infringes a regulation or Company rule or can be considered immoral behavior, but it seems to be wrong, it is possible to contact the company's Supervisory Body (ODV) by the contact email and post address set forth above.

## **7.8 Unfounded report upon the outcome of the investigation**

If the report is found to be unfounded or unjustified the case is closed.

## **7.9 Well-founded report upon the outcome of the investigation**

If the report is well-founded, the corrective measures to be implemented will be identified as well as any applicable disciplinary sanctions, taking into account current legislation and internal regulations.

## **7.10 Security and Identification**

The Syntrio platform does not generate or keep any authentication data related to the IP address. This means that it is not able to provide information that links your computer to its use.

In any case, if you don't feel comfortable about making a report from your company computer, you can still connect to the Syntrio website using other computers or even you can call by the phone numbers provided.

The Syntrio procedure has been designed to protect anonymity. If you wish to remain anonymous, please take care not to give details in your report which could reveal your identity (e.g. avoid sentences such as: "from my desk next to Giuseppe Verdi's..." or "In my 48 years of life..." or using a login and email that can lead to your identity)

## **7.11 Confidentiality and data protection**

Regardless of whatever whistleblowing channel you decide to use, any reports and subsequent communications, as well as all the data and information concerning the persons involved, will be considered strictly confidential and will be handled with utmost confidentiality, in compliance with the requirements of the Company's data protection provisions and of

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applicable legislation.

## 7.12 Information needed to give when making a report

Information needed are those necessary to start the evaluating and/or investigating the reported event. When making a report, avoid giving information about the private life of individuals, i.e. sensitive data, such as details on their health or sex life, if information of this kind is not strictly necessary or directly related to your report. You should also avoid giving information about people who are not involved in or related to the report.

## 8. REVIEW AND REVISIONS

This Policy will be reviewed periodically (at least every 3 years) and updated if necessary.

## 9. REASON FOR CHANGE

Not applicable as this is the first version of this document.

## 10. PREVIOUS HISTORY OF POLICY

Not applicable as this is the first version of the document.

## 11. REFERENCES

**"Privacy applicable Laws"** shall mean (1) Directive 95/46/EC (Data Protection Directive); (2) Directive 2002/58/EC (Privacy and Electronic Communications Directive), in each case as transposed into domestic legislation of each Member State of the European Economic Area and in each case as amended, replaced or superseded from time to time, including without limitation by the EU General Data Protection Regulation 2016/679 of the European Parliament and of the Council ("GDPR") or (2) any substantially similar data protection laws enacted by the United Kingdom following any exit from the EEA;

**"Authorized Service provider"** means the service provider appointed by Genenta Science: Lighthouse Service LLC. Genenta Science Personal Data are processed as required by Article 28(3) of the GDPR and, where applicable, equivalent requirements of other Applicable Laws.

Lighthouse Service LLC shall, in relation to Genenta Science Personal Data, has implemented appropriate technical and organizational measures in accordance with standard industry practices to ensure a level of security appropriate to the risk, including, as appropriate, the measures referred to in Article 32(1) of the GDPR.

**"Genenta Science Personal Data"** means any Personal Data Processed by the Service Provider on behalf of Genenta Science or any Genenta Science Affiliate pursuant to or in connection with the contract in place with Lighthouse Service LLC, to the extent that it is governed by applicable laws;

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**"Data Processor"** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**"Data Subject"** means an identified or identifiable natural person;

**"EEA"** means the European Economic Area as well as any country for which the European Commission has published an adequacy decision as published at [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm);

**"Personal Data"** means any information relating to a Data Subject;

**"Processing" or "Process"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**"Restricted Transfer"** means the transfer of Genenta Science Personal Data that is located in the EEA to Lighthouse Service LLC that is not located in the EEA where such transfer would be prohibited by Applicable Laws. Lighthouse Service LLC is prohibited from disclosing or using any information obtained in connection with its performance (including without limitation any "nonpublic personal information" as defined in Section 573.3 of Title 12 of the Code of Federal Regulations) for any purpose other than to carry out the purposes of providing hotline reporting services to Genenta Science. Lighthouse Service LLC complies with any and all applicable US Federal, State, and local laws and regulations concerning privacy of information in addition to the "Privacy applicable laws" set forth above;

**"Special Categories of Personal Data"** means Genenta Science Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data (when used for the purpose of uniquely identifying a natural person), biometric data (when used for the purpose of uniquely identifying a natural person), data concerning health, and/or data concerning a Data Subject's sex life or sexual orientation;

**"Supervisory Authority"** means an independent public authority which is established by a Member State pursuant to Article 51 of the GDPR.

## Annex 1: Using the Lighthouse Anonymous Reporting App

### Welcome to the Anonymous Reporting App from Lighthouse Services

This app can be downloaded to your phone and will enable you to submit new anonymous reports and follow up on anonymous reports related to an issue at your company or organization.

In order to use the app:

First, download it to your phone and install it.

- If your phone is an iPhone, download the app [here](#) or scan this code



- If your phone is not an iPhone, download the app [here](#) or scan this code



- If you are not currently reading this on your phone, use your phone to go to the Apple App Store (<https://www.apple.com/ios/app-store>) or the Google Play store (<https://play.google.com/store>) and search for “Anonymous Reporting”.

### MAKING A NEW REPORT

When you open the app, it will present you with a field containing the words “Enter Keyword”. The keyword should be provided by your employer or other organization that subscribes to the Lighthouse service. Once you enter it, click “Save”. This will save that keyword in “Your Keywords”.

Click the keyword to submit your report. After submitting a report, you will be provided with a case number. You can store this case number in the app by copying the case number provided, clicking on the edit icon for the keyword and pasting it into the 'Enter Case Number' field. If you provided a PIN during report submission, check the 'This case number has a PIN' checkbox. There is no field to save your PIN; you will still need to remember it. Select 'Save' to store the case number.

### FOLLOWING UP ON A PREVIOUS REPORT

To follow up on a specific report, select the case number below the keyword on the dashboard page. If a PIN was required during report submission, the Case Management System portal page will be displayed with the case number pre-populated. You'll need to enter the report's PIN to access the report through the portal.

If a PIN was not required during report submission, your company's or organization's anonymous web reporting page will be displayed. On that page, click the submit button labeled "Don't have a PIN" under the 'Already Made a Report Selection'. This will take you to your organization's web reporting page. Scroll down and click “Don't have a PIN” under “Already Made a Report?”