

OPERATING REGULATION
OF THE SUPERVISORY COMMITTEE

References: *Italian Legislative Decree no. 231/2001*

Code of Ethics

Model 231

Group Whistleblowing Policy

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1. DEFINITIONS

In this document, the following terms shall have the meanings set forth below:

- **“Code of Ethics” or “Code”:** The business conduct document, adopted at the Group level, and also approved by the Company, which expresses corporate policy and contains general principles of conduct - including recommendations, obligations, and/or prohibitions - that Recipients must comply with, and whose violation is subject to disciplinary sanctions.
 - **“Company”:** d’Amico International Shipping S.A.
 - **“Confindustria Guidelines”:** The guidelines for drafting Organizational, Management, and Control Models pursuant to Italian Legislative Decree No. 231/2001, approved by Italian General Confederation of Industry (Confindustria) on March 7, 2002, and updated in June 2021, which have been taken into account for the preparation, adoption, and updating of the Model and its related annexes.
 - **“Confitarma Guidelines”:** The guidelines for the drafting of the Organization, Management, and Control Models pursuant to Legislative Decree 231/2001, drawn up by the Italian Shipowners' Confederation (Confitarma) in accordance with Article 6, paragraph 3, of Legislative Decree 231/2001 and approved by the Ministry of Justice on October 14, 2014, following the review procedure initiated pursuant to Article 5 et seq. of Ministerial Decree No. 201 of June 26, 2003, which have been taken into account for the preparation, adoption, and updating of the Model and its related annexes.
 - **“Disciplinary System”:** The set of sanctions and disciplinary measures provided for by the applicable law that are to be considered in the event of violations of procedural and behavioral rules established by the Model and the Code of Ethics.
 - **“Employee(s)”:** All individuals who have an employment relationship with the Company.
 - **“d’Amico Group” or “Group”:** For the purposes of this document, “Group” refers to the aggregated corporate structure consisting of d’Amico Società di Navigazione S.p.A. and its direct and/or indirect subsidiaries.
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- **“Guidelines for the Internal Control and Risk Management System”**: The guidelines that DIS’ Board of Directors adopted for the definition of the Internal Control and Risk Management System.
- **“Internal Control and Risk Management System” or “ICRS”**: Internal Control and Risk Management System consists of a set of organizational structures, rules and corporate procedures aimed at guaranteeing an effective and efficient process of identification, measurement, management and monitoring of the main risks, with the purpose of contributing to the sustainable success of the Company, also through the definition of adequate information flows aimed at fostering the coordination and circulation of information among the various players of the ICRS.
- **“Legislative Decree No. 231/2001” or “Decree”**: Legislative Decree No. 231 of June 8, 2001, titled “Regulation of the administrative liability of legal entities, companies, and associations, including those without legal personality, pursuant to Article 11 of Law No. 300 of September 29, 2000,” published in the Official Gazette of the Italian Republic No. 140 of June 19, 2001, and subsequent amendments and integrations.
- **“Operational Procedure(s)”**: The organizational, physical, and/or logical measure rules containing the protocols as set out in the Model to prevent the commission of Offenses.
- **“Organizational, Management, and Control Model pursuant to Legislative Decree no. 231/2001” or “Model”**: The Organizational, Management, and Control Model deemed suitable for preventing Offenses and, therefore, adopted by the Company pursuant to Articles 6 and 7 of the Decree to prevent the commission of Offenses by Senior Personnel or Personnel under the direction of others.
- **“Criminal Offenses” or “Offense”**: The set of criminal offenses, or the single offense, referenced in Legislative Decree No. 231/2001 (as may be amended and integrated in the future).
- **“Ultimate Parent Company”**: d’Amico Società di Navigazione S.p.A.
- **“Partner”**: entities—whether or not they have their own legal autonomy—with whom the Company may engage in business relationships even if part of the Group.

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- **“Personnel”**: All individuals who have a working relationship with the Company, including Employees, temporary workers, collaborators, interns, and freelancers who have been assigned a task by the Company.
 - **“Personnel under the direction of others”**: Individuals as defined in Article 5, paragraph 1, letter b) of the Decree, i.e., all Personnel operating under the direction or supervision of Senior Personnel.
 - **“Recipients”**: The corporate bodies of the Company (i.e. the members of the board of directors), Employees, Personnel, agents, attorneys, outsourcers, and Partners.
 - **“Sensitive Activity/Activities”**: The process, operation, act, or set of operations and acts that may expose the Company to the risk of committing an Offense.
 - **“Senior Personnel”**: Individuals as defined in Article 5, paragraph 1, letter a) of the Decree, i.e., those who hold representative, administrative, or managerial functions within the Company or one of its organizational units with financial and functional autonomy, as well as those who, even de facto, exercise management and control over the Company. Specifically, this includes members of the board of directors, delegated bodies, top-level management (executives and heads of department), any general attorneys, and authorized representatives.
 - **“Supervisory Committee” or “Committee”**: The Company’s body established under Article 6 of the Decree, responsible for supervising the operation and compliance with the Model and the Code of Ethics, as well as their updating.
 - **“Whistleblowing Report Manager”**: The collegial and autonomous body established by the Ultimate Parent Company at the Group level and entrusted by it (and by the other companies based on their belonging to the Group) with the management of so-called whistleblowing reports, ensuring compliance with the confidentiality of the whistleblower's data and the confidentiality of sensitive information related to the report.
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For anything not expressly defined in this section, reference is made to the definitions in the general part of the Model, in the Code of Ethics, in the Flow of Information Policy and in the Group Whistleblowing Policy.

2. PURPOSE AND SCOPE OF APPLICATION

The Supervisory Committee is established within the Company with oversight and control functions regarding the operation, effectiveness, adequacy, and compliance with the Model as adopted by the Company, aimed at preventing criminal Offenses.

This regulation (hereinafter the “Regulation”), whose proper application is under the responsibility of the Supervisory Committee, governs its activities in accordance with the resolutions of the Board of Directors that established the Model and the Supervisory Committee itself.

The Supervisory Committee is also responsible for monitoring the proper implementation of the Model, with specific supervisory functions concerning violations that may affect the functionality of the Model itself and is involved in the Internal Control and Risk management System (ICRS) of d’Amico International Shipping S.A..

3. OPERATING MODES

This chapter outlines the operating procedures and functioning of the Supervisory Committee.

3.1. Appointment and composition of the Supervisory Committee

Given the specific tasks assigned to the Supervisory Committee, the related position has been entrusted to a collegiate body consisting of a minimum of three (3) members, one of whom acts as President, appointed by the Company’s Board of Directors through a resolution appointing the members.

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The Company's Board of Directors appoints the members of the Supervisory Committee, having consulted the Control and Risk Committee¹, through a specific Board resolution.

The members of the Supervisory Committee are selected from natural persons, both internal and external to the Company, who can collectively ensure the following characteristics:

➤ **Autonomy and independence**, that is:

- The functional autonomy of the Committee itself;
- Possession of independent powers of initiative and control;
- Absence of operational tasks²;
- Position within the Company's hierarchical structure as a top-level body, reporting and answering exclusively to the Board of Directors;
- The possibility to communicate directly with the Control & Risk Committee by way of taking part to its meetings upon invitation.

➤ **Honesty, professionalism, and competence**, that is:

- Knowledge of the organization and the main business processes typical of the industry in which the Company operates;
- Legal knowledge sufficient to identify potential criminal offenses and assess the impacts derived from the regulatory context on the Company's operations;
- Knowledge of principles and specialized techniques related to the activities performed by those generally engaged in control or "inspection" activities³;

¹ Ref. ICRS Guidelines, par. 3.2.

² Cf. Cass. Sez. VI penale, sent. n. 23401/2022 "...The Supervisory Committee must not have any operational functions, as these would inevitably undermine its autonomy. Instead, it is tasked with ongoing systemic oversight of the precautionary rules established and compliance with them within the framework of the Model...".

³ Cf. Confindustria Guidelines, chapter IV par. 2.2. pag. 79 ss. By way of example: statistical sampling, risk analysis and evaluation techniques, measures for their containment (authorization procedures, mechanisms for segregation of duties, etc.), flowcharting of procedures and processes to identify weaknesses, interview techniques and questionnaire development, elements of psychology, methodologies for detecting fraud, etc.

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- **Continuity of action**, to be achieved through the presence within the Supervisory Committee of an internal person dedicated to the monitoring activities of the Model.

It is not permitted to appoint a person as a member of the Supervisory Committee who:

- is responsible for other operational tasks within the Company⁴;
- belongs to a body/function of the Company (or one of its subsidiaries) that has a connection, not free from potential influences, with the top management of the Company itself⁵;
- is responsible for the ISO 9001 system procedures or responsible for health and safety within the Group⁶;
- represents (by law or *de facto*) or is a family member of individuals who are incompatible with the qualification of a member of the Supervisory Committee;
- has been subjected to preventive measures imposed by the Italian judicial authority pursuant to Italian Legislative Decree No. 159/2011 and subsequent amendments and integrations, or to similar measures imposed by non-Italian judicial authorities (for

⁴ Cf. Confindustria Guidelines, chapter IV par. 2.2. pag. 77 ss. Operational tasks refer to those related to the authority to make decisions that have economic and financial effects for the company.

⁵ Cf. Ordinanza GIP Trib. Napoli, 26 June 2007.

⁶ Cf. Ordinanza GIP Trib. Roma, 4 April 2003.

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example, for violations of legislation of EU Member States concerning the fight against organized crime, adopted in implementation of EU Directive 2024/1226);

- has been convicted by a judgment, even if not final⁷, issued by Italian or foreign judicial authority:
 - For an Offence considered as a predicate Offence for which the administrative liability of entities is established by Italian Legislative Decree No. 231/2001, or under other similar non-Italian legislation;
 - To a penalty involving disqualification, even temporarily, from holding public office or from holding management positions in legal entities or companies;
 - For a non-negligent offence, sentenced to at least two years' imprisonment.

The Supervisory Committee is allocated with an annual budget necessary to carry out its function, which is approved by the Company's Board of Directors.

Any expenses exceeding the approved budget must be ratified directly by the Board of Directors.

The Supervisory Committee manages the use of the financial resources made available by the Board of Directors, allocating them to purposes consistent with the performance of its tasks. The spending power, within the limits of the approved budget, is exercised autonomously and independently.

3.2. Term of office and replacement of members of the Supervisory Committee

The Board of Directors determines the term of office for the members of the Supervisory Committee in the appointment resolution, which is generally no less than three years (unless motivated exceptions apply).

The members of the Supervisory Committee thus appointed remain in office for the entire

⁷ Cf. Confindustria Guidelines, chapter IV par. 2.2. pag. 79. Even before the finality of the conviction, the individual, even if not guilty on a criminal level, may not be in a position of sufficient independence to hold the role of a member of the Supervisory Committee.

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duration of their mandate, regardless of any changes to the composition of the Board of Directors that appointed them. The mandate may be renewed at each expiration without any limit on the number of mandates.

The members of the Supervisory Committee cannot be removed by the Board of Directors except for justified cause.

The following represent cases of justified cause for the removal of members of the Supervisory Committee:

- Failure to attend more than two consecutive meetings without a valid reason;
 - Failure to fulfill the assigned duties (e.g., failure to respond in a timely manner to the Board of Directors regarding oversight and control activities, lack of cooperation with other members of the Committee, failure to perform activities in good faith and with the diligence required by the nature of the position and the specific expertise of the members of the Committee);
 - Termination of the employment relationship, if the member is also an Employee or an employee of a Group company;
 - The member being subjected to legal disqualification or incapacity procedures;
 - Indictment in criminal proceedings (under Italian or foreign judicial authority) involving allegations of Offenses underlying the entity's administrative liability or for crimes which are punishable by disqualification, even temporarily, from public office or from managerial positions in legal entities;
 - The revocation of the entire Board of Directors or one or more of its members following unlawful acts that have generated (or may generate) the liability of the Company and/or its Board of Directors' members, which were not reported by the Supervisory Committee.
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With the resolution for the removal of a member of the Supervisory Committee, the Board of Directors shall proceed to appoint a new member.

In addition to cases of death, members of the Supervisory Committee automatically cease to hold office if they fall under the ineligibility criteria set out in paragraph 3.1 or if they no longer meet the requirements of autonomy, independence, integrity, professionalism, and competence required for the role of Supervisory Committee member.

Each member of the Supervisory Committee may resign at any time from his/her position, with a reasoned and specific communication to the Chairman of the Board of Directors.

In the event of resignation or automatic removal of a member of the Supervisory Committee, the member will promptly inform the other members and the Chairman of the Board of Directors, which will promptly inform the Board of Directors that will take the necessary decisions, appointing a new member as a replacement following the same procedure for the appointment of the members of the Committee.

The Chairman of the Committee, or in his absence the longest-serving member of the Supervisory Committee, is required to promptly inform the Board of Directors of the occurrence of any event that would necessitate replacing a member of the Supervisory Committee.

The Supervisory Committee is considered fully dissolved if, due to resignation or other reasons, the majority of its members are no longer in place. In such a case, the Board of Directors will appoint new members for the entire Committee.

3.3. Rules for the Convening and Functioning of the Supervisory Committee

In performing its activities the Supervisory Committee is assisted by a Secretary, who may be an external or internal individual appointed by the Committee itself during its first meeting following the assignment of the Supervisory role, and for the same duration of the Committee's mandate. The Secretary's duties include preparing everything necessary for the meetings of the Committee (convening notices, collection of supporting materials, etc.), keeping the documents related to the Committee's activities (resolutions, minutes, reports sent and received), ensuring the proper

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outcome of communications and operations arising from the decisions of the Committee, and, more generally, handling the tasks necessary to ensure the efficient functioning of the Committee.

The Supervisory Committee is convened by the Secretary on behalf of the Chairman of the Committee or, in the Chairman's absence, and when deemed necessary, also at the request of any member, by notice containing the agenda on the items that will be addressed by the Committee.

The convening is made via e-mail sent to the e-mail address of each Committee member at least two (2) calendar days before the scheduled meeting date, or, in cases of urgency, at least twenty-four (24) hours before the meeting.

In the absence of the aforementioned formalities, the Supervisory Committee is still regularly constituted if all its members are present.

To validly held the Committee's meeting, the attendance of the majority of its members is required, while decisions are taken by the majority of votes. Each member of the Supervisory Committee is entitled to one vote. In the event of a tie, the the Chairman of the Committee has the casting vote.

The meetings of the Supervisory Committee may be held via audio/video conference or, unless otherwise indicated in the convening notice, at one of the Group's premises or another location agreed upon by its members. The minutes will mention the manner in which the meeting was conducted.

The Secretary, when external, is automatically invited to the Committee's meetings, and other individuals who are not members of the Supervisory Committee may attend in an informative and consultative capacity (such as representatives of the independent external audit firm, heads of Group's departments, the Internal Auditor, etc.), provided they are explicitly invited by the Committee and with reference to specific agenda's items of the meeting.

The meetings of the Supervisory Committee are chaired by its Chairman, who, in case of his/her

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absence or temporary impediment, is replaced by the longest-serving member of the Committee. The Secretary draft the minutes of each Committee's meeting, the minutes are circularized among the members and when agreed are signed by both the Secretary and the Chairman of the Committee (or the chairman of the meeting). The minutes must include the date and time of the meeting's opening and closing, the participants (members and invited people), the agenda, the discussions on the topics, the decisions taken, and the reasons for those decisions. However, the minutes should not include details regarding any whistleblowing reports shared with the Supervisory Committee by the Whistleblowing Report Manager, as these will be handled according to the guidelines set out in the Group Whistleblowing Policy and in section 3.7. Members of the Committee who disagree with the recorded decisions may request that their dissenting opinion and the corresponding reasoning be noted in the minutes.

If a Committee's member has a direct or indirect interest in a decision to be taken, said member must notify in writing his/her interest, including by formalizing it in the minutes, and abstain from voting, although the member in conflict retains the right to attend the meeting and, only after declaring his/her interest, to express his/her opinion on the matter. In such cases, the decisions of the Supervisory Committee must also include reasoning in relation to the Company's interest.

In case of failure to comply with the abstention obligation, the resolution will be considered invalid if, without the vote of the Committee's member who should have abstained, the necessary majority would not have been reached.

3.4. Functions and powers of the Supervisory Committee

The Board of Directors is the body ultimately responsible for adopting the Model and taking all decisions and carrying out all activities related to the Internal Control and Risk Management System of the Company.

The Supervisory Committee is entrusted with the task of supervise:

- a) on the effectiveness and adequacy of the Model in relation to the Company's structure
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and its actual ability to prevent the commission of Offences, and in particular:

- Interpreting the relevant laws and regulations;
 - Conducting assessments of business activities for the purpose of updating the mapping of Sensitive Activities, also through self-assessment techniques;
 - Evaluating, in advance, and based on the results of the Offence risk analysis, the suitability of the Operating Procedures to prevent Offences, with the power to express a dissenting opinion on the contents of Operating Procedures issued or in the process of issuance⁸;
 - Coordinating with the Group department responsible for communication and training activities to define the content of periodic communications to be made to Employees and corporate bodies, ensuring that all Recipients are appropriately sensitized and adequately informed about Legislative Decree no. 231/2001 and the Model, controlling the execution of these communications;
 - Updating the space on the Group's ICT tools (Group intranet and Company's website) containing all information related to the Decree and the Model, in collaboration with the relevant corporate departments;
 - Supervising the correct management of the whistleblowing reporting system, assessing its compliance with the regulatory requirements, as well as its actual suitability to detect and prevent violations of the Model adopted by the Company;
- b) on the compliance with the Model's provisions by the Recipients, including through the relevant Group departments (effectiveness of the Model), and in particular:
- periodically auditing documents, procedures or business processes related to Sensitive Activities to verify compliance with Operating Procedures;
 - coordinating with all Group's departments to carry out the audit activities on Sensitive Activities to be subjected to specific control;
 - collecting, analyzing and storing information flows;

⁸ Cf. Cass. Sez. V penale, sent. n. 4677/2014.

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- initiating and conducting internal investigations, including in-depth reviews and unplanned inspections, each time coordinating with the relevant Group's department to obtain additional investigative elements;
 - periodically verify the implementation and actual functionality of the proposed solutions/corrective actions;
 - coordinate with the Group's Human Resources department to evaluate the adoption of any disciplinary sanctions, while maintaining the management's competence for imposing the sanction according to the related disciplinary procedure.
- c) on the need to update the Model itself, whenever the need for its updating is identified in relation to changed business conditions and/or regulations, and on the implementation of proposed updates, particularly:
- periodically provide an assessment of the adequacy and effectiveness of the Model, based on the results of the audit and control activities;
 - in relation to these assessments, periodically present to the Board of Directors proposals for updating the Model and outline the actions deemed necessary for the effective implementation of the updated Model (adoption of procedures and standard contractual clauses, etc.).

For the performance of its role and functions, the Board of Directors grants the Supervisory Committee the necessary powers of initiative and control, along with everything needed to ensure its ability to supervise the functioning and compliance with the Model, and to update it in accordance with the provisions of the Decree. Moreover, considering the specific responsibilities assigned to the Supervisory Committee and the specialized professional content required by those responsibilities, the Supervisory Committee is supported in its monitoring and control tasks by all internal Group's departments. It may also utilize the support of external professionals when their expertise is deemed necessary on a case-by-case basis.

It is the responsibility of the Board of Directors to periodically assess the adequacy of the Supervisory Committee in terms of its organizational structure and the powers granted to it,

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making any necessary changes and/or additions through a Board resolution.

3.5. Duty to inform Corporate Bodies

The Supervisory Committee reports directly and exclusively to the Board of Directors regarding the implementation of the Model, in order to ensure full autonomy and independence in carrying out its assigned duties.

The Supervisory Committee fulfills this reporting obligation annually, through a report to be sent to the Board of Directors.

This annual report must cover:

- The activities carried out, specifically indicating the monitoring activities performed and their outcomes, the audits conducted and their results;
- Any critical issues and/or recommendations that have emerged, both in terms of internal behaviors or events and the effectiveness of the Model;
- The corrective and improvement measures planned and their implementation status.

In case of urgency or upon request, the Supervisory Committee is required to immediately report any identified critical issues to the Board of Directors and/or facts/relevant events emerged and to inform the Board on the opportunities to update the Model 231..

Additionally, the Supervisory Committee presents an annual activity plan for the following year to the Board of Directors, which is subject to a specific acknowledgment.

The internal member of the Supervisory Committee takes also part in the meetings of the Control and Risk Committee upon invitation to speak on specific issues⁹.

The Chairman of the Board of Directors have the authority to summon the Supervisory Committee at any time. In turn, the Supervisory Committee has the right to request the urgent convening of these bodies.

⁹ Ref. ICRS Guidelines, par. 3.6.

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3.6. Information Flows to the Supervisory Committee

The obligation to establish structured information flows is designed as a key tool for the Supervisory Committee to:

- Effectively monitor the efficiency and implementation of the Model to ensure its proper application and adequacy in preventing Offenses;
- Conduct ex-post investigations to determine the causes that enabled or contributed to the occurrence of Offenses;
- Enhance the planning of control activities, allowing for continuous improvement in risk management and compliance monitoring.

The reporting obligation applies to all Group departments, particularly those who manage Sensitive Activities considered to be at higher risk of Offenses.

This reporting obligation pertains to the periodic findings of control activities carried out by Group departments to implement the Model, as well as any anomalies or irregularities detected within the available information¹⁰.

The subject, frequency, recipients, and transmission methods of the information flows are defined in the Flow of Information Policy, to which explicit and full reference is made.

The reporting obligations do not require the Supervisory Committee to carry out a detailed and systematic verification of everything presented in the documents and acts sent to it by the various Group departments, but only what may involve liability under Legislative Decree 231/2001.

To this end, the Supervisory Committee has unrestricted access and the ability to acquire all documentation it deems relevant. It must also have the ability to obtain data and key information regarding, for example:

- aspects of business activities that may expose the Company to the risk of committing Offenses;

¹⁰ Cfr. Confindustria Guidelines, chapter IV par. 3, pag. 89.

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- relationships with Partners operating on behalf of the Company in the context of Sensitive Activities;
- extraordinary transactions of the Company.

In the performance of its function, the Supervisory Committee must maintain the utmost discretion and confidentiality regarding the Company's information it handles and the information it acquires, having the Board of Directors as the sole point of reference for the results of its analyses.

3.7. Management of whistleblowing reports

In compliance with the provisions of Italian Legislative Decree no. 24/2023 and European Directive UE 2019/1937, the Ultimate Parent Company has adopted the Group Whistleblowing Policy for the management of reports, to which full reference is made.

This policy defines the cases and procedures for the involvement of the Supervisory Committee in the reporting management process, as well as the role and responsibilities assigned to it.

3.8. Planning of supervision and control activities

The Supervisory Committee develops its intervention activity plan (hereinafter also referred to as the "Audit Plan") in order to monitor the functioning and compliance of the Model, considering the cyclical rotation of audits, prioritizing the checks on Sensitive Activities with the highest risk and/or those subject to older audit interventions. If any issues related to Sensitive Activities emerge during the year, the plan is promptly updated in accordance with the findings.

The adoption of a risk-based approach in planning the oversight and control activities may, in fact, result in more frequent or closer-in-time checks in relation to higher-risk areas, or in differently scaled audits depending on the level of exposure to risk.

During the planning phase of these activities, interactions and information exchanges are foreseen

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between the Committee and the second and third-level control functions existing in the organization.

The plan includes both the monitoring and control activities (e.g., compliance audits on operational procedures, meetings with the Heads of the relevant Group departments, specific 231 audit/testing interventions, follow-ups on previous audit activities focusing on resolving previously identified deficiencies and assessing the implementation status of corrective measures, etc.) as well as the informational and training activities for the recipients on topics related to the administrative liability of the entity and the adopted 231 Model.

The Audit Plan is drafted in terms of:

- verification activities;
- frequency and timing of these activities;
- identification of the necessary resources, including the potential outsourcing of audits to third parties;
- identification of the department involved.

The Audit Plan is subject to resolution by the Supervisory Committee and acknowledgment by the Board of Directors and may be duly modified during its implementation when necessary due to new and emerging priorities. The activities outlined in the plan follow a three-year timeframe and are formally confirmed on an annual basis.

In carrying out its duties and within the limits of the financial resources allocated, the Committee may rely on external consultants to support the execution of the activities included in the plan.

The Supervisory Committee and the Head of Internal Audit cooperate through the exchange of reports on the mutual verification activities carried out. The audit plan drafted by the Head of Internal Audit and by the Committee are mutually shared in order to coordinate audit activities.

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3.9. Collection and storage of information

Each minutes, pieces of information or report under the responsibility of the Supervisory Committee are collected, stored, and maintained by the Committee¹¹ for a period of ten (10) years in a designated partition of the Company's file server (electronic archive). Access to this archive is strictly limited to Committee's members and the external Secretary with a read-only permissions. The Secretary has both read and write permissions.

The archive, whose management and updates are entrusted by the Committee to the Secretary's responsibility, consists of:

- summoning of Supervisory Committee meetings;
- minutes of Supervisory Committee meetings (hereinafter "Minutes"), which must concisely indicate the date and time of the meeting's opening and closing, participants, agenda, discussions, decisions, and the reasoning behind those decisions. Access to the minutes is permitted only to members of the Board of Directors upon a justified request from the Chairman of the Board of Directors;
- Audit Plan;
- Reports from the Supervisory Body addressed to the Board of Directors;
- Information flows (periodic or event-driven) received by the Supervisory Committee and considered relevant;
- All information and documents that allow the tracking of the activities and verifications carried out by the Supervisory Committee, including documents related to the Audit Plan, audit/testing 231 reports and supporting documentation, relevant email exchanges between the Committee and the parties involved in verification activities, as well as all reports and documents prepared by the Committee following other activities within its competence (e.g., inspections, evaluation of procedures and other Company

¹¹ Cf. Confindustria Guidelines, chapter IV par. 2.1. pag. 81. In order to ensure the effectiveness of the activities carried out by the Supervisory Committee, it is necessary that the same guarantees the traceability and preservation of the documentation related to the activities performed (minutes of meetings, specific reports or information, reports sent or received, results of investigations related to reports, etc.).

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documentation, training activities conducted, proposals for disciplinary proceedings, etc.).

Access to the Supervisory Committee's email inbox (odv.dis@damicoship.com) is strictly reserved, with read-only permissions granted exclusively to the members of the Committee and the Secretary (if external), while write permissions are granted solely to the Secretary and the internal member in coordination with the other Committee members.

4. AMENDMENTS TO THE REGULATION

The Supervisory Committee has the competence and independent powers of self-regulation to modify this regulation, whenever deemed appropriate and/or necessary.
