

WHISTLEBLOWING DISCLOSURE

The Docebo Group has adopted a global procedure for the management of whistleblowing reports at the bottom of this information (hereinafter, the "**Procedure**"). The Procedure also applies fully to Docebo S.p.A. (hereinafter, the "**Company**"). However, due to the regulatory provisions introduced by Legislative Decree 24/2023, the Company specifies the following which supplements the Procedure with respect matters or individuals specifically of the Company:

Anyone who reasonably suspects that unlawful conduct has occurred or may occur may submit a Report through the following internal reporting channels:

- by accessing the web reporting platform accessible through the Docebo S.p.A. institutional website: www.integritycounts.ca/org/docebo
- through the telephone line dedicated to reports to the following telephone number (available for Italy): **00-800-2002-0033**
- by email: docebo@integritycounts.ca

Reports can also be made through the external Reporting channel through the ANAC platform, at: <https://whistleblowing.anticorruzione.it/#/>

External Reporting is allowed when:

- the mandatory internal channel is not active or is active but does not comply with the provisions of the legislator regarding the subjects and methods of submitting reports;
- the Reporter has already made a Report through the internal channel, but the same has not been followed, as the Reporter has not received the acknowledgment of receipt of the Report and / or information on the management of the Report;
- the Reporter has reasonable grounds to believe that, if he/she made a Report through the internal channel, it would not be followed;
- the Reporter has reasonable grounds to believe that, if he/she made a Report through the internal channel, he would expose himself/herself to risks of Retaliation;
- the Reporter has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest.

The responsible for the management of the Reports are the subjects identified in the Procedure and, for the Company, the Chief Human Resources Officer who, for the purposes of managing the Report, skilled with specific training and the requirement of autonomy pursuant to art. 4 of Legislative Decree 24/2023.

Those responsible for managing Reports:

- send an acknowledgment of receipt of the Report to the Whistleblower within 7 days from the date of receipt of the Report where his/her identity has been communicated;
- provide feedback on the outcome of the internal investigation not exceeding 3 months from the date of submission of the report;
- maintain interlocutions with the reporting person;
- follow-up to the reports received in compliance with Legislative Decree 24/2023.

Once the admissibility of the report has been evaluated, the responsible for managing the reports

start the internal investigation of the facts or conduct reported.

The responsible for the management of the Reports may request from the Reporter, where his/her identity has been communicated, clarifications regarding what has been reported, also in order to assess whether to proceed to file the Report.

The Reporting Managers evaluate all the reports received, taking the consequent initiatives at its reasonable discretion and responsibility within the scope of their competences, possibly listening to the author of the report and the responsible for the attached violation.

Any subsequent decision must state the reasons on which it is based.

Any disciplinary measures are applied by the competent corporate bodies, in accordance with the provisions of the Procedure and the disciplinary system of the Organizational, Management and Control Model pursuant Legislative Decree 231/2001 of the Company.

In the event that it considers filing the Report, the responsible for managing the Reports shall draw up a written report containing:

- i. a description of the content of the Alert;
- ii. a description of any in-depth activities carried out and the elements collected;
- iii. the reasons that led to the conclusion regarding the filing of the Report.

This report is sent to the Board of Directors and the Supervisory Body of the Company.

The processing of data arising from the management of Reports will be carried out by the Company in its quality of Data Controller in full compliance with the applicable privacy legislation and according to the methods indicated in the specific information.