

Whistleblowing Policy

Ilserv S.r.l. – a subsidiary of Enviri Corp.

I. Scope.

This policy applies to all persons who work for or with the organization, including managers, directors, employees, consultants, contractors, apprentices, trainees, remote workers, part-time or fixed-term workers, temporary staff, and casual workers. It also applies to external parties, including collaborators, agents, distributors, representatives, consultants, freelancers, suppliers, contractors, and partners, who are materially and/or continuously involved in sensitive activities carried out on behalf of, or in the interest of, Ilserv.

II. Policy Purpose

The purpose of this policy is to:

- encourage personnel to report suspected wrongdoing as early as possible, in the knowledge that such concerns will be taken seriously, investigated where appropriate, and treated with due confidentiality;
- provide personnel with clear guidance on how to raise such concerns;
- reassure personnel that any report made in good faith may be raised without fear of retaliation, even if it ultimately proves to be unfounded.

This policy does not form part of any employee's contract of employment and may be amended at any time. In addition, this policy forms an integral part of the Organisation, Management and Control Model ("Model") adopted by Ilserv S.r.l. ("Ilserv") pursuant to Legislative Decree 231/2001 ("Decree 231"). Ilserv S.r.l. is an Enviri Corp. subsidiary.

As provided for by Article 6, paragraph 2-bis and following of Decree 231, an adequate Model must provide, among other things, for internal reporting channels, a prohibition on retaliation, and a disciplinary system suitable for sanctioning failure to comply with the measures set out in the Model, in accordance with Legislative Decree No. 24/2023 implementing Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and national legal provisions (the "Whistleblowing Decree" or "Legislative Decree 24/2023")

III. Definitions.

Whistleblowing- is the reporting, in the public interest, of information concerning suspected wrongdoing or dangers connected with work-related activities. Reports may relate, by way of example, to:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- breach of legal, professional, or regulatory obligations
- corruption
- financial fraud or mismanagement.

In particular, in accordance with the Whistleblowing Decree, the following may be reported:

- unlawful conduct relevant under Decree 231, including conduct constituting one or more offences within the catalogue of crimes giving rise to the liability of legal entities, or conduct constituting violations of the Model;
- offences falling within the scope of European Union or national acts, including acts implementing European Union law, relating to the sectors identified in the Whistleblowing Decree;
- acts or omissions constituting fraud, or other unlawful activity, affecting the financial interests of the European Union;
- acts or omissions concerning the internal market of the European Union, for example breaches of competition and State aid rules;
- acts or conduct which, in any way, frustrate the object or purpose of European Union acts in the areas mentioned above.
- The following may not, however, be reported under this policy:
- mere rumors or hearsay;
- complaints, claims, requests, or grievances linked to a personal interest of the Whistleblower;
- any conduct falling outside the regulatory scope of Legislative Decree 24/2023.

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¹ The provisions contained in this Procedure do not - in any way - exempt persons who, being public officials or persons in charge of a public service, are burdened with the obligation to report, pursuant to the provisions of Article 331 of the Code of Criminal Procedure and Articles 361 and 362 of the Criminal Code, to the judicial or accounting authorities.

¹ For a more exhaustive analysis of the information that cannot be reported under the Whistleblowing Decree - and, more generally, for a full examination of its objective scope - please refer to Article 1 of the Whistleblowing Decree. In particular, the following cannot be the subject of a Report (i) violations already mandatorily regulated by the European Union or national acts indicated in Part II of the Annex to the Whistleblowing Decree, or by the national acts constituting implementation of the European Union acts indicated in Part II of the Annex to Directive (EU) 2019/1937, although not indicated in Part II of the Annex to the Whistleblowing Decree; (ii) violations relating to national security, as well as to procurement relating to defense or national security aspects, unless such aspects are covered by the relevant secondary law of the European Union.

Effective Date: March 20, 2026

Responsible Department: Enviri Legal Department

A Whistleblower is a person who, in good faith, reports a genuine concern relating to one of the situations described above. Where a person has reasonable grounds to believe that any such conduct has occurred, is occurring, or is likely to occur, the matter should be reported as soon as possible. This policy must not be used for complaints relating to personal circumstances, for example regarding the way a person has been treated at work. In such cases, the Grievance Procedure should be followed. If there is any uncertainty as to whether a particular situation falls within the scope of this policy, advice should be sought from the local Human Resources representative, the Legal team, or Compliance@enviri.com.

IV. Policy.

How to Make a Whistleblowing Report

Employees may raise a concern to their line manager verbally or in writing. However, if the matter is particularly serious, if you believe that your manager has not addressed your concern, or if you prefer not to raise it with them for any reason, you should contact your local Human Resource representative, Legal team or file with the [Integrity Line](#).

Confidentiality

Where a confidential report is made, every effort will be taken to protect the reporter's identity and to restrict disclosure to what is necessary for the purposes of the investigation or as otherwise required by law. Anonymous reports, including those made through the Integrity Line, may affect the Company's ability to conduct a full investigation, including obtaining further information and assessing the matters raised. However, such reports may still be considered at the Company's discretion, to the extent permitted by applicable law.

External Disclosures

The intent of this policy is to provide an internal mechanism for reporting, investigating, and addressing reportable concerns. Where the conditions set out under applicable law are met, reports may also be made externally to the competent authority, including the Italian National Anti-Corruption Authority (ANAC), in accordance with Legislative Decree No. 24/2023. Whistleblowing reports may concern the conduct of employees as well as the actions of third parties, such as customers, suppliers, or service providers, where relevant to the matters covered by this policy.

In order to ensure the highest level of protection, the Company considers and handles anonymous reports in accordance with the criteria set out in this policy. In particular, anonymous reports will be taken into consideration where they are properly substantiated and concern conduct falling within the scope of the Whistleblowing Decree.

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Investigation and Outcome

Upon receipt of a report, acknowledgment will be provided promptly and in any event within 7 days. A preliminary assessment will be undertaken to determine whether further inquiry is required. The reporter will be informed of the follow-up taken or proposed to be taken within 3 months of the acknowledgment of receipt or, if no acknowledgment is sent, within 3 months from the expiry of the 7-day period following submission of the report.

Where appropriate, an investigator or investigation team may be appointed, including individuals with relevant investigative experience or specialist knowledge of the subject matter of the report. Any such investigator(s) may make recommendations for changes intended to reduce the risk of future wrongdoing.

Reasonable efforts will be made to keep the reporter informed of the progress of the investigation and the expected timetable. However, confidentiality obligations may restrict the information that can be disclosed in relation to the investigation or to any disciplinary action arising from it. All information relating to the investigation must be treated as confidential. Where it is determined that a report has been made maliciously or for personal gain, disciplinary action may be taken.

Although a particular outcome cannot be guaranteed, concerns raised under this policy will be addressed fairly and appropriately. If the reporter is dissatisfied with the handling of a concern, the matter may be raised with the local Human Resources representative or the Legal team.

Protection and Support for Whistleblowers

No member of staff will be subjected to detrimental treatment for making a report. Detrimental treatment includes dismissal, disciplinary action, threats, or any other unfavourable treatment connected with raising a concern.

Retaliation against Whistleblowers is prohibited. This includes threatening, intimidating, harassing, or otherwise retaliating against an individual for making a report. Any member of staff who engages in such conduct may be subject to disciplinary action.

Prohibition of Retaliation

The Company prohibits retaliation, discrimination, or any other form of adverse treatment in connection with a report made under this policy. No person may be dismissed, demoted, suspended, threatened, harassed, or otherwise disadvantaged, whether directly or indirectly, because they have made, or are believed to have made, a report. For further information, see the Company's [**Anti-Retaliation Policy**](#).

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For the purposes of this policy, retaliation includes any act, omission, conduct, or threatened conduct arising as a result of a report and causing, or capable of causing, unjust harm to the Whistleblower, whether directly or indirectly. Retaliation may include, by way of example:

- a) dismissal, suspension, or equivalent measures;
- b) demotion or denial of promotion;
- c) changes in duties, workplace, salary, or working hours;
- d) withholding of training or restricting access to training;
- e) negative performance assessments or references;
- f) disciplinary measures or other sanctions, including financial penalties;
- g) coercion, intimidation, harassment, or ostracism;
- h) discrimination or other unfavourable treatment;
- i) failure to convert a fixed-term contract into a permanent contract where there was a legitimate expectation of such conversion;
- j) non-renewal or early termination of a fixed-term contract;
- k) damage to reputation, including on social media, or economic or financial loss, including loss of business opportunities or income;
- l) formal or informal blacklisting or other arrangements that may affect future employment prospects in the relevant sector or industry;
- m) revocation of a licence or permit; and
- n) requiring the individual to undergo psychiatric or medical examinations.

These protections apply even where a report is ultimately found to be unfounded, provided it was made on the basis of reasonable grounds to believe that the information reported was true at the time of the report. Any breach of this prohibition may result in disciplinary action against the person responsible, together with any other appropriate measures in accordance with applicable law and any relevant collective agreements.

Traceability and Data Retention

Reports received and the related documentation are stored and archived in paper and/or digital form, adopting all necessary precautions to ensure the highest level of confidentiality. Personal data is processed in compliance with Regulation (EU) 2016/679, Legislative Decree No. 196/2003, and, in any event, in accordance with any other applicable legal and regulatory privacy provisions.

Personal data that is manifestly irrelevant to the handling of a specific case must not be collected or, if collected accidentally, must be deleted immediately. The processing of personal data relating to the receipt and handling of a report is carried out in accordance

² Pursuant to Article 17 of the Whistleblowing Decree, in the context of judicial or administrative proceedings or, in any case, out-of-court disputes concerning the ascertainment of the prohibited conduct, acts or omissions against the whistleblower, it is presumed that such conduct or acts were put in place because of the case. The burden of proving that such conduct or acts are motivated by reasons unconnected with the case is on the person who has committed them. In the event of a claim for damages submitted to the judicial authority by the whistleblower, if such persons prove that they have made a report and suffered a damage, it is presumed, unless proved otherwise, that the damage is a consequence of such report, public disclosure or complaint to the judicial or accounting authority.

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with the principles set out in Articles 5 and 25 of Regulation (EU) 2016/679 and the relevant legal and regulatory privacy provisions, by providing appropriate information notices to the Whistleblower and the other persons involved pursuant to Articles 13 and 14 of the same Regulation, and by adopting appropriate measures to safeguard the rights and freedoms of the data subjects.

Reports and the related documentation are retained for the time necessary to handle the report and, in any event, for no longer than five years from the date of communication of the final outcome, in compliance with the confidentiality obligations set out in the Whistleblowing Decree and the principles established by the applicable privacy legislation, unless longer retention is necessary for litigation purposes or in response to requests from the competent authorities. The full text of the privacy notice is contained in a separate document.

V. Enforcement and Consequences.

All employees are responsible for following this policy. Managers are responsible for communicating and consistently enforcing this policy. Violation of this policy will lead to management action which could include discipline up to and including termination.

VI. Contact Information.

Enviri Legal and Compliance Department:
LegalSupport@enviri.com

VII. Signature, Title and Date of Approval



Samuel Romainsky
VP, General Counsel & Chief Compliance Officer