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WHISTLEBLOWING GUIDELINES

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1. Introduction

These Guidelines regulate the procedure for receiving, analysing and processing Reports, by whomsoever sent or transmitted, including those which are confidential or anonymous, as well as the related system for safeguarding the same.

The document meets the requirements of Legislative Decree 24/2023, concerning the "*Implementation of (EU) Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national laws*" (hereinafter the "Whistleblowing Decree"), and has been drawn up in compliance with the Code of Ethics, Model 231 and Snam's Anti-Corruption Guidelines.

In accordance with the provisions of the ANAC Guidelines drawn up on the matter, adopted on 12 July 2023, Snam guarantees "*the manifestation of freedom of expression and information, which includes the right to receive and communicate information, as well as the freedom and pluralism of the media. It is a tool for fighting (and preventing) corruption and bad administration in the public and private sectors*", aware that whistleblowers may provide information that can lead to the investigation, detection and prosecution in cases of breaches of the regulations.

Consequently, these Guidelines set out to ensure the protection - both in terms of confidentiality and protection from retaliation - of persons who make themselves vulnerable by reporting, denouncing or through public disclosure, contribute to the discovery and prevention of risks and situations detrimental to the public administration or the entity to which they belong and, as a result, to the collective public interest.

2. Scope of Application

These Guidelines apply to:

- Snam S.p.A. and its subsidiary companies, pursuant to the scope of direction and coordination activities exercised by the former;
- reports received by Snam and/or its subsidiaries, whether operative in Italy and/or abroad;
- and they are also brought to the attention of the other investee companies in order to promote behaviours and principles in line with those expressed by Snam.

Snam and its subsidiaries manage reports and the related data processing in full compliance with the provisions of European Regulation No. 679/2016 (GDPR) and national privacy legislation, also meeting the confidentiality requirements for the performance of the investigations described below.

In accordance with Article 1, the Whistleblowing Decree applies to persons who report breaches of national or European Union regulatory provisions, as defined below, which they have become

aware in the course of their work and which are detrimental to the integrity of Snam S.p.A. and/or its subsidiaries¹.

3. Definitions

- **Breaches:** conduct, acts or omissions detrimental to Snam's integrity, consisting of:
 1. administrative, accounting, civil or criminal offences, which do not fall under the provisions set out in numbers 3, 4, 5 and 6 below²;
 2. offences pursuant to Legislative Decree 231/2001, or breaches of Model 231 not covered by numbers 3, 4, 5, and 6 below;
 3. offences falling within the scope of the European or national legislation referred to in the Annex to the Decree or the internal legislation implementing the European Union acts indicated in the Annex to Directive (EU) 2019/1937 (although not mentioned in the Annex to the Decree), with regard to the following sectors: public tenders; financial services, products and markets and the prevention of money laundering and financing of terrorism; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and personal data protection and the security of networks and information systems;
 4. acts or omissions affecting the EU's financial interests;
 5. acts or omissions affecting the internal market (competition, state aid, corporate tax breaches and avoidance);
 6. acts or behaviour that frustrate the object or purpose of the provisions set out in points 3, 4 and 5.
- **Report:** written or oral communication of information (including well-founded suspicions) regarding Breaches committed or likely to be committed, as well as elements concerning conduct aimed at concealing such Breaches.
- **Whistleblower:** a natural person who reports or publicly discloses information on Breaches acquired in the context of his or her work-related activities (within which he/she may suffer retaliation).

Whistleblowers include: employees; self-employed workers; casual workers; workers on

¹ These Guidelines do not apply to:

- disputes, claims or requests of a personal nature concerning individual employment relations, or relations with hierarchically superior figures;
- reports of breaches already covered by national or European Union legislation (e.g. specific legislation on financial services, prevention of money laundering and terrorist financing, transport safety and environmental protection);
- reports concerning national security and defence, or related procurement.

² Pursuant to Article 3 of the Whistleblowing Decree, this type of breach is envisaged solely for Snam S.p.A.'s subsidiaries such as Snam Rete Gas S.p.A., Stogit S.p.A. and GNL S.p.A., which in certain circumstances may be qualified as "public service concessionaires".

staff leasing contracts; collaborators; workers/collaborators of parties supplying goods or services or carrying out work on behalf of third parties; freelancers and consultants; volunteers; trainees (paid and unpaid); shareholders; persons with administrative, management, control, supervisory and representative functions (including de facto). Whistleblowers also include persons: (i) whose legal relationship with Snam has not yet begun, if information on Breaches was acquired during the selection process or in other pre-contractual phases; (ii) during the trial period; (iii) after termination of the relationship, if information on Breaches was acquired during the course of the relationship;

- **Facilitator:** a natural person who assists the Whistleblower in the reporting process, operating in the same work-related context and whose assistance must be kept confidential;
- **Reported person or Person concerned:** the natural or legal person mentioned in the Report as the subject to whom the Breach is attributed or in any case as the subject associated with the Breach;
- **Internal reporting channels:** the communication methods identified by Snam, which allow Reports to be made.

4. Description of the Report Management Process and Responsible Parties

4.1. General principles

1. Internal Control System: Snam undertakes to promote and maintain an adequate internal control system, to be understood as all the tools necessary or useful for guiding, managing and checking activities in the company, aimed at ensuring compliance with corporate laws and regulatory instruments, protecting corporate assets, efficiently managing activities, and providing precise and complete accounting and financial information.

The responsibility for implementing an efficient internal control system is shared at all levels of Snam's organisational structure. Consequently, all Snam People, according to their functions and responsibilities, actively contribute to the correct functioning of the internal control system.

2. Compliance culture: Snam promotes the dissemination at all levels, of a Compliance culture and of rules characterised by awareness of the existence of controls and by an informed and voluntary implementation-oriented mentality; consequently, the management, first and foremost and all Snam people are bound to contribute to and participate in Snam's internal control system and, positively involve their collaborators in

such respect³.

3. Ombudsman: the external party⁴ to which Snam and each Subsidiary have entrusted the receipt and management of the whistleblowing system, the operational management of which, as set out in these Guidelines, is entrusted to the Internal Audit department.

For the purposes of analysing the Report, the Internal Audit department may involve, as required and depending on the needs and specific features of the Report, the Heads of the company departments concerned, if any (Legal, HR, HSEQ, etc.), so that they can assist and contribute to the investigation of the Report, providing feedback and any other documentation needed to investigate the Reports received.

4. Independence and professionalism of internal audit activities: the internal audit department ensures that the necessary conditions of independence and due professional objectivity, competence and diligence are maintained, as set out in the international standards for the Internal Audit professional practice and code of ethics issued by the Institute of Internal Auditors (IIA), as well as in the Snam Code of Ethics.

5. Guarantees of confidentiality: all the organisational units/positions of Snam and its subsidiaries involved in receiving and processing Reports, must guarantee: absolute confidentiality of the identity of the Whistleblower, and of the person in any case mentioned in the Report, as well as the content of the Report and related documentation, to such purpose using communication criteria and methods able to safeguard the integrity of the persons mentioned, so that the person making the Report is not subject to any form of retaliation.

The identity of the Whistleblower may not be disclosed, without his/her express consent, to persons other than the Persons in charge⁵ of managing the Internal Reporting Channels and other persons involved in any way, if necessary, in following up the Report⁶.

Individuals who breach the regulations for the protection of the Whistleblower shall be subject to the disciplinary system referred to in Model 231.

The communication of such information by the Ombudsman is always allowed, in compliance with the general principle of confidentiality vis-a-vis: (i) the competent Watch Structures, including in their capacity as Guarantors of the Code of Ethics or of the Anti-Corruption Committee only in cases in which the Report concerns anti-corruption matters; (ii) the Internal Audit department for the purpose of analysing the Report (iii) the Compliance department for the coordination and management of relations with the Watch

³ Snam Code of Ethics, Chap. III para. 5.1.

⁴ Specifically, the role of Ombudsman is entrusted to an external professional with the expertise, independence and suitability for carrying out the task.

⁵ These are the: Ombudsman, Internal Audit, Compliance department and Human Resources department.

⁶ Breaches will be sanctioned by application of the disciplinary system referred to in Model 231.

Structures and (iv) the Human Resources department for any disciplinary measures falling within its remit.

6. Protection from Reports made with wilful misconduct or gross negligence: Snam works to ensure that its people at all levels work together to maintain a climate of mutual respect for the dignity, integrity and reputation of each person in the company; it will therefore take action to prevent insulting, discriminatory or defamatory interpersonal behaviour⁷. With this in mind, Snam and its subsidiaries act to ensure proper protection from Reports made with wilful misconduct or gross negligence.

The Company promotes communication and information activities for employees, to ensure the broadest knowledge and most effective application of these Guidelines which set out to illustrate, inter alia: (i) whistleblowing rules; (ii) the actual functioning and access to the channels and the tools made available by the Company; and (iii) the regulatory system.

4.2. Internal reporting channels

In order to facilitate the receipt of Reports, Snam and its subsidiaries have set up the following internal reporting channels through which Reports can be made in written form or verbally:

- an information technology platform known as the "whistleblowing platform", which guarantees the anonymity of the Whistleblower and ensures that his or her identity cannot be traced by technical means, allowing Reports to be managed in accordance with the principle of segregation;
- e-mail: segnalazioni@snam.it
- P.O. Box: OMBUDSMAN SNAM – Piazza S. Barbara 7 20097 San Donato Milanese (MI). The hard copy of the document is forwarded to the Ombudsman, in a closed envelope, through the Secretarial office of the Watch Structures;
- direct meeting with the Internal Audit department, at the request of the Whistleblower, to be arranged within a reasonable time.

Any person⁸ receiving a Report that has passed through channels outside the established channels shall forward it promptly and in any case within 5 days of receipt to the Ombudsman, using the established channels and maximum confidentiality criteria to safeguard the identity of the Whistleblower in compliance with the confidentiality criteria as described above.

Reports made through direct meetings are documented in minutes or by recording them on a suitable device/recording medium. The Whistleblower may verify, correct and confirm the minutes of the meeting, by signing them; the minutes are then inserted in the Report "Folder".

⁷ Gross negligence is understood as a major breach of the diligence, prudence and expertise obligations that must be complied with in the case in point.

⁸ These include, by way of non-limiting example: Snam Personnel, Watch Structures, Independent Auditors and any other Business Partner.

4.3. Receipt

The Ombudsman:

- registers the original of the Report received through channels other than the computer system, entering it in the system with the support of the Compliance department, or examines the Report recorded by the system automatically and, after consulting the Compliance department, which ensures organisation of the activities of the Secretarial office of the Watch Structures, promptly informs the Watch Structure deemed competent, so as to fulfil the obligations set out in Model 231 and/or as Guarantor of the Code of Ethics, and initiates the activities described in subsections 4.4.1 et seq. below;
- issues a Notice of Receipt of the Report to the Whistleblower within 7 days if received through channels other than the system, which notifies the Whistleblower of its receipt;
- with the assistance of the Internal Audit department, ensures reporting to the Corporate Control Bodies as described in subsection 4.4.5 below, in compliance with the general principle of confidentiality.

4.4. Investigation

The necessary investigations are conducted with regard to the reported events through one or more of the following activities, ensuring that such stages are carried out as quickly as possible, whilst guaranteeing the completeness and accuracy of the investigation activities:

- 4.4.1 Preliminary investigation;
- 4.4.2 Investigation;
- 4.4.3 Audit;
- 4.4.4 Corrective action monitoring;
- 4.4.5 Reporting;
- 4.4.6 Feedback.

4.4.1 Preliminary investigation

If, upon a preliminary analysis, the Ombudsman deems the content of the Report received to be reliable and consistent, it proceeds with the preliminary investigation and therefore, via the portal:

- a) opens the "Folder" as specified above;
- b) starts the investigation procedure, where suitable conditions are found to provide feedback on the facts reported;
- c) provides feedback to the Whistleblower within 7 days of receipt of the Report, as further specified in subsection 4.3;

with the assistance of the Compliance department, informs:

- a) the Internal Audit department for the management, monitoring and reporting activities of the whistleblowing process;
- b) the competent Watch Structure in relation to possible breaches of the Code of Ethics and Model 231;
- c) the Anti-corruption Committee⁹ appointed pursuant to UNI ISO 37001, in cases of Reporting on corruption matters only.

If, instead, after an initial analysis, the Ombudsman does not consider the content of the Report received to be reliable or consistent, he forwards it to the Compliance department, which archives it on the whistleblowing platform, leaving a record of the motivations for such. If the Whistleblowing Report does not fall within the scope of these Guidelines, the Ombudsman forwards it to the Compliance Department, which then passes it on to the competent corporate departments concerned, if any (e.g. in the case of operational requests received through this channel). In any case, feedback is provided to the Whistleblower.

4.4.2 Investigation

The investigation is aimed at conducting targeted inspections on verifiable detailed Reports which make it possible to identify, analyse and evaluate any elements that might confirm whether the reported events are well-founded.

The Internal Audit Department ensures the performance of the necessary inspections: either directly, at the concerned company facilities (lines), or through line personnel in possession of an adequate seniority level that may be identified by the senior management of Snam or its subsidiaries, and acquires the necessary information elements to perform the evaluations.

The Person concerned may make a statement at his/her request or have written comments and documents put on record. Such person does not always have the right to be informed of the Report concerning him/her, but only of the proceedings initiated against him/her, if any, after management of the Report has been concluded and if such proceedings are based in whole or in part on the Report.

At the end of the investigations, the Internal Audit department prepares and shares with the Ombudsman a note proposing archiving of the report, which includes, if the report is founded, the plan of action and/or consequent management actions, and submits it, where relevant for the purposes of Legislative Decree 231/2001 or in the case of alleged breaches of the Code of Ethics, to the competent Watch Structure, and if the Report concerns anti-corruption matters, to the Anti-Corruption Committee, which may:

⁹ The Anti-Corruption Committee appointed by resolution of the Board of Directors on 18 January 2023 and CEO Circular No. 1/2023.

- request further investigations/in-depth examinations¹⁰.
- approve the filing proposal.

The approved archiving proposals are registered on the whistleblowing platform by the Technical Secretarial office of the competent Watch Structure or by the Secretarial office of the Anti-Corruption Committee and are included in the Quarterly Statement on Reports.

If, at the outcome of the investigation activities, profiles emerge which are the responsibility of the "Compliance Team", the measures taken by the latter are communicated and forwarded to the Internal Audit department so as to enable updating of the Quarterly Statement on Reports. The measures taken by the Team and the resulting measures notified to the supplier/subcontractor are sent to the Executive Director of the Internal Audit Department, who takes them into account for the purposes of the reporting set out in these Guidelines. Periodic progress reports are also sent in order for the Internal Audit Department to draw up the "Quarterly Statements on Reports".

4.4.3 Audit

The aim of the audit activities performed by the Internal Audit department is to proceed with specific investigations, analyses and evaluations regarding the validity of the reported events, as well as to formulate recommendations on the necessary corrective action to be adopted with regard to the company areas/processes concerned by the Report, in relation to which the managers prepare a specific plan of action.

If deemed necessary, the Internal Audit department may refer the analyses and assessments to an Audit intervention already envisaged in the Plan or activated ad hoc (so-called Spot Audit)¹¹.

The audit activities of the Reports are conducted by the Internal Audit Department after consulting the Ombudsman, with priority over other audits included in the Annual Plan, taking into account the principles and methods of performance regulated by the reference regulatory framework on the matter of Internal Audit Activities¹².

The finalised audit report is an integral part of the archiving proposal.

4.4.4 Corrective action monitoring

If the investigation phases and/or audit generate corrective actions of the Internal Control System, the management is responsible for preparing a corrective action plan aimed at remedying the critical issues found.

The Internal Audit department monitors the implementation/adoption thereof, updates the Report Folder and informs the competent Watch Structure and/or the Anti-corruption Committee, as part of its reporting activity.

¹⁰ Having completed the further investigations/in-depth examinations, the flow of activities resumes from point 4.4.2.

¹¹ With regard to the methods for activating a spot audit, please refer to the provisions of the audit charter.

¹² "Guidelines of the Board of Directors of Snam on Internal Audit activities".

4.4.5 Reporting

The Internal Audit Department ensures the preparation of quarterly Statements on Reports.

The report contains an indication of the Report Folders opened during the quarter in question, as well as those proposed for archiving.

The report, anticipated by the Ombudsman, is forwarded to the Watch Structure, as well as to the person who holds the institutional role of Guarantor of the Code of Ethics and/or, for those aspects falling within its strict remit, to the Anti-Corruption Committee, and for information to the following:

- Chairman of Snam;
- Chief Executive Officer of Snam;
- Snam Board of Statutory Auditors;
- Control, Risk and Related Party Transactions Committee;
- Snam Independent auditing firm;
- Chief Legal Officer & General Counsel of Snam;
- Chief Financial Officer and Officer Responsible of Snam;
- Chief People & Organization Officer of Snam.

With reference to the Reports relating to the subsidiaries, the Statements, insofar as relevant, are sent to the Chief Executive Officers and Chairmen of each subsidiary concerned, as well as to the related Control and Watch Structures¹³.

4.4.6 Feedback

The Ombudsman, with the help of the Internal Audit department, provides feedback to the Whistleblower as to the follow-up (i.e. the action taken to assess the existence of the facts reported, the outcome of the investigation and the measures taken, if any) of the Report given, or to be given, within three months of the date of receipt of the Report Receipt Notice or, in any case, within three months of expiry of the period of 7 days from the receipt of the Report. If the Report has been archived, as described above, such feedback is provided to the Whistleblower by Internal Audit.

News of the feedback is provided in the Quarterly Report and in the Report Folder.

4.5. Protection of Whistleblowers and disciplinary measures

¹³ The information is provided as part of the control and supervisory duties of said Bodies. The investigations conducted by Snam Internal Audit do not modify the prerogatives and independence typical of the Control and Watch Structures of the company concerned pursuant to company regulations and legal provisions. For "*issues pertaining to the administrative liability of companies pursuant to Legislative Decree 231/2001*", as set forth in paragraph 3.3 of Model 231, "*the Watch Structures of the subsidiaries, where necessary, may resort to external resources for the performance of the inspections to the extent that they deem them necessary in accordance with the "independent powers of initiative and control"* to which they are entitled pursuant to Article 6, subsection 1 letter b) of Legislative Decree 231/2001.

Snam guarantees the absence of retaliation against a Whistleblower who, in good faith, makes a Report in compliance with these Guidelines, regardless of the personal reasons that may have led him or her to make the Report.

Specifically, if in connection with the methods and/or content of the Report submitted, the Whistleblower in good faith may be identified and is an employee of Snam, all suitable measures must be taken by the Human Resources Department to prevent his/her initiative from resulting in any direct or indirect retaliation, for reasons directly or indirectly related to the Report, as identified in article 17 of the Whistleblowing Decree.

To such purpose, for a period of two years from the date of the Report (or identification of the Whistleblower, if later), the competent Watch Structure or Anti-corruption Committee, supported by the relevant company departments, monitors the professional career of the Whistleblower to make sure that he/she has not been adversely affected as a result of the Report.

4.5.1 Prohibition of retaliation

The Whistleblower may not be retaliated against¹⁴:

- if, through the Report, he/she discloses or disseminates information covered by the obligation of secrecy, protected by copyright or by the protection of personal data or offending the reputation of the Reported person, if this is necessary to disclose the breach and make the Report;
- for the manner in which the information is acquired, unless this constitutes a criminal offence.

The protections referred to in these Guidelines also apply to Facilitators; to persons in the same work environment as the Whistleblower, related to them by a stable affective bond or kinship up to the fourth degree; to colleagues who have a habitual and current relationship with the Whistleblower; entities owned by the Whistleblower or for which they work, as well as entities operating in the same work context.

4.5.2 Loss of protection

With reference to the application of these Guidelines:

- when the criminal liability of the Whistleblower for the offences of defamation or slander, or civil liability, for the same offences, in the cases of wilful misconduct or gross negligence, is ascertained, even by a judgement of first instance, the protection of the Whistleblower is not guaranteed; in addition, a disciplinary sanction will be imposed;
- if the results of the investigation and/or audit reveal alleged illegal or irregular conduct by

¹⁴ The contents of this paragraph have been drafted in compliance with the provisions of Legislative Decree. 24/2023 and in compliance with the indications contained in the Guidelines issued by ANAC.

one or more Snam employees, the Ombudsman, through the Internal Audit department, forwards the results of the checks to the Chief People & Organisation Officer for the subsequent activities of the Human Resources department, which, after informing the competent Watch Structure and/or the Anti-Corruption Committee for aspects strictly within its remit:

- initiates the procedure by collecting the data and information pertaining to the employees involved from the units/companies and checks with the same as to the presence of any damage caused to the Company;
- examines any possible breaches of legal and/or contractual and/or internal regulatory provisions (including Snam's Code of Ethics and Model 231), with the aid of the Legal Department.

In the event that the alleged unlawful conduct found is not deemed liable to disciplinary action, the Human Resources department, after consulting Internal Audit, informs the competent Watch Structure or the Anti-Bribery Committee for the aspects falling within its remit and the Ombudsman through the Internal Audit department.

In the event that the alleged unlawful conduct is found to give rise to disciplinary measures, the Human Resources Department evaluates the seriousness of the conduct and formulates a proposal for the appropriate organisational/management actions. The proposal highlights the damage caused to the Company or the related estimate.

After informing the Internal Audit department, the Human Resources department initiates the disciplinary actions, promptly informing the competent Watch Structure of its commencement and results, or the Anti-corruption Committee for the aspects within its remit as well as the Legal Department, which evaluates the necessary measures vis-à-vis the competent Judicial Authorities and any legal action to be put in place to protect Snam's interests. Internal Audit informs the Ombudsman.

4.6.Data controller and supervisor for privacy purposes

- The "Data controller" of personal data relating to these Guidelines is the legal entity: Snam or each subsidiary of Snam, in relation to the control of the relations to which the data refer.
- The "Data Processor" who carries out processing of the data relating to Reports, in compliance with current legislation is: (i) the Ombudsman as the person responsible for receiving and managing Reports; (ii) the Head of the Internal Audit department who carries out the investigation activities; (iii) the Head of the Compliance department for the coordinated management of the Secretarial office of the Watch Structures and the Anti-Corruption Committee.

5. Preservation of and access to documentation

The units and positions involved in the activities governed by this document ensure, each within its specific purview and including through the information systems used, the traceability of the data and information and see to the storage and filing of the relevant documentation, whether in hard copy or electronic format, in such a way as to allow the reconstruction of the different stages of the process itself.

The storage of the original Report documentation in special paper/IT archives is guaranteed with the highest security/confidentiality standards.

The Report and related documents are kept for as long as necessary to manage and follow-up the Report, and in any case no longer than 5 years from communication of the final outcome of the Report procedure.

The paperwork relating to the audits concerning Reports is stored in the general archive of the Internal Audit department.

These Guidelines are intended to be distributed as widely as possible.

To this end, it is delivered or disclosed:

- to the members of the Board of Directors and Statutory Board of Auditors of Snam and of its subsidiaries;
- to the members of the Watch Structure of Snam and of its subsidiaries, including in the capacity of Guarantors of the Code of Ethics;
- to all the employees of Snam and its subsidiaries through publication on Snam's intranet and internet sites.

6. Responsibility for updating

Snam's Compliance and Internal Audit departments review these Guidelines on a regular basis to ensure their effectiveness over time and their adherence to any emerging best practices, suggesting improvements if any gaps or issues emerge.

In the event of breaches, the above departments are responsible for determining whether any legislative reviews or procedural improvements could prevent recurrence of the breach.