RESPONSIBLE BUSINESS PARTNERS POLICY



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Introduction

Bolton strives for healthy, sustainable growth to guarantee tomorrow's prosperity. Our purpose is to make the difference everyday through daily moments that positively change consumers' lives.

Respect for Society and the Planet lays the foundation of our Sustainable Development strategy. Our branded products touch the lives of millions of people every day and channel value creation for the benefit of Nature and People.

Our activities rely on natural resources and thriving societies, depending directly on balanced, well-functioning ecosystems and on the respect for individuals along our value chains. Protecting resources and the planet, and having a positive impact on our employees, partners, suppliers and communities, is vital for sustainable growth.

As a manufacturing company we aim to manage actual and potential, negative and positive impacts of our products and operations, incorporating a value chain perspective. Value chain partners play a crucial role in evolving the way Bolton does business. Specifically, supply chains work as engines of the global economy and represent a key lever for Bolton's positive impact generation. They are a strategic dimension to ensure the stability of supplies and encompass opportunities to fully integrate sustainability into our business models.

We aim to play an active role along our value chains and support in increasing due diligence at global level.

Bolton's Responsible Business Partners Policy presents our approach to value chain management and outlines the fundamental principles guiding our business partnerships. This document establishes the general requirements set for our Business Partners, enabling a continuous improvement approach to increase resilience beyond our own operations.

Scope of Application

Bolton's Responsible Business Partners Policy applies to:

- All suppliers of goods, packaging, raw materials and/or services, including:
 - Direct Suppliers: those providing materials, components and assemblies that will be sold to customers as parts of a physical product. These include, but are not limited to, suppliers of raw materials, packaging materials and commercial goods.
 - o Indirect Suppliers: those providing facilities, equipment, consumable supplies and Maintanance, Repair and Operations (MRO) as well as services not directly related to the manufacturing of Bolton's products, such as marketing, distribution, R&D, recruiting, consultancies of various nature, etc.
 - Tier 1 suppliers: suppliers who invoice Bolton for goods and services. These include direct and indirect suppliers.

- Tier n suppliers¹: suppliers operating upstream of tier 1 suppliers.
- Agents, importers and companies distributing or selling products on behalf of Bolton, large-scale distribution and customers.
- Contractors and subcontractors who have a commercial and/or contractual relationship with Bolton.
- Non-profit organisations receiving monetary or non monetary (e.g., products) donations from Bolton.

All such entities are required to adhere to the requirements outlined in this document and in the specific documentation referred to, that represent the minimum requirements that recipients must achieve to have business relations with Bolton.

We seek to establish partnerships with those who commit to our approach to strengthening value chain due diligence to protect human rights and the environment and expect Business Partners to cascade equivalent requirements within their supply chains.

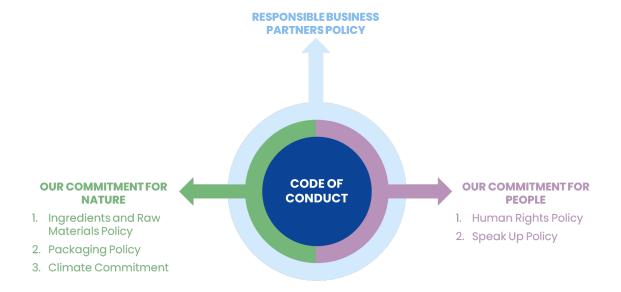
Compliance with requirements could be achieved by Business Partners through the application of their own policies, practices and management systems, if aligned with the principles set in the minimum requirements of this policy and in the Bolton's broader Policy Framework.

Our Policy Framework for Business Partners

Bolton's responsible Business Partners Policy is part of our policy framework, in which our Code of Conduct defines the ethical principles and rules of business conduct to be applied inside and outside the company, while topic-specific policies identify sets of rules for relevant issues linked to Nature and People, identified through a double materiality perspective.

This document groups the minimum requirements set out for Business Partners and clarifies their role in Bolton's sustainable development journey. Each Bolton Category may develop additional documents to address industry-specific requirements, consistent with the Group Policy Framework.

¹ While Tier n suppliers are included in the scope of the policy, their engagement is primarily pursued indirectly through Tier 1 suppliers, recognizing that Bolton may not have direct oversight or influence over all upstream actors.



<u>Bolton Code of Conduct:</u> outlines Bolton's founding principles and values. It represents a vehicle to share our strong company culture and establishes the basic principles, commitments and guidelines for practices and behaviors which are expected by our employees and Business Partners.

Commitment for Nature – Business Partners' Requirements

- Policy on Ingredients and Raw Materials: outlines Bolton's commitment to responsibly sourcing ingredients and raw materials and establishes sourcing principles that allow us to offer premium consumer goods which are safe for people, while respecting Nature and People. The policy contains appendixes covering sourcing requirements and principles specific to key ingredients of our categories.
- Packaging Policy: outlines Bolton's commitment to rethink and redesign our packaging (and products when needed) in line with the principles of a circular economy through innovation and taking inspiration from market best practices. The document establishes a commitment to proactive engagement with our value chain to maximize results. It is founded on three principles: less packaging, material circulation and consumer engagement.
- <u>Climate Commitment:</u> our sustainability report outlines the key features of Bolton's roadmap for an actionable transition to a low carbon economy and supports our Science Based Target Initiative (SBTi) commitment.

Commitment for People – Business Partners' Requirements

• <u>Human Rights Policy:</u> outlines the Group's commitment to upholding the internationally recognized Human Rights, as laid out in the Universal Bill of Human Rights and related conventions like the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the United Nations Conventions on the Rights of the Child. Bolton aims to eradicate the violation of Human Rights wherever possible. This policy sets out the requirements that Bolton and its Business Partners shall comply with.

Fundamental Principles

Bolton requires Business Partners to align with principles linked to each pillar of its Sustainable Development Strategy.

POSITIVE IMPACT BRANDS

Our Business Partners are key in innovation and design processes of our products. They ensure safe high-quality goods, and responsible R&D, marketing and communications.

COMMITMENT FOR NATURE

Our Business Partners are key levers for the achievement of our climate commitments, in reinforcing our circularity roadmap, in our plan for oceans' protection and to advance water stewardship strategy.

They are expected to minimize the environmental impact of their activities by complying with regulatory requirements and acting in line with Bolton's topic-specific policies.

COMMITMENT FOR PEOPLE

Our Business Partners are key for the development of societies impacted by our business activities.

They are crucial in advancing human rights protection throughout their value chains.

They are expected to minimize impacts on human rights by complying with regulatory requirements, acting in line with Bolton's topic-specific policies, and adopting a strong due diligence approach.

REPONSIBLE BUSINESS CONDUCT

Our Business Partners are required to develop business relations with us, with transparency, integrity and trust. They are required to conduct business affairs by complying with legislative and regulatory requirements and with the highest ethical standards, as established by our Code of Conduct.

Fundamental Requirements

The requirements established below for Bolton's Business Partners are rooted on our policy framework. In case of future evolutions and integration of new requirements in our Code of Conduct and topic-specific Policies, Bolton will update the Responsible Business Partners Policy and its updated version will be made available on the corporate website.

Business Partners must also comply with industry requirements set out in Bolton Category-specific documents consistent with the Group Policy Framework.

1. COMPLIANCE WITH APPLICABLE LEGISLATION

The requirements set for our Business Partners in this document shall always be understood as additional to full compliance with the applicable legislation within the scope of their activity, both locally and internationally.

Where national laws and international human rights standards differ, Bolton will follow the higher standard; where they conflict, Bolton will respect national laws while respecting human rights to the greatest extent possible and expects its Business Partners to do the same.

2. POSITIVE IMPACT BRANDS

Requirement 2.1: Product Quality and Safety

- Business Partners comply with legislative and regulatory requirements at local and international level to ensure product quality and safety. They must be authorized by local authorities to carry out their activities.
- Business Partners select raw materials and ingredients to ensure consumer wellbeing and the highest quality standards. They use and constantly monitor raw materials and ingredients that guarantee maximum safety for both consumers and employees.
- Suppliers provide Bolton with products and/or services that meet the criteria set out in the purchasing agreement and are suitable for their intended use, complying with the specifications established in such agreements.
- Suppliers are responsible for meeting the above specifications whether they are
 directly supplying the goods and/or services to Bolton or have sub-contracted the
 supply to a third party. In order to ensure an appropriate degree of control over the
 suppliers network, suppliers should require prior authorization to Bolton in case of
 any sub-tender (such as sub-agents, sub-sales representatives, sub-contractors or
 similar set-up).
- Adequate procedures and communication channels must be in place to ensure that Bolton is immediately notified about any kind of quality or safety problem regarding the product supplied involving the supplier or along the supply chain.
- Suppliers are expected to appropriately identify hazardous substances and chemical mixtures based on international standards and regulations, and communicate them to Bolton.
- Suppliers ensure that hazardous substances and chemical mixtures are handled, used, transported, stored, recycled and disposed of safely.

Requirement 2.2: Research and Development

 Business Partners conduct research and development responsibly, following good clinical practice and generally accepted scientific, technological and ethical principles.

Requirement 2.3: Responsible Marketing and External Communication

- Business Partners respect and apply all local regulations that define marketing practices.
- Business Partners provide clear and truthful information, upholding the principle of responsible communication that helps consumers make informed choices and purchases.
- Business Partners promote respectful use of media and advertising and are committed to always safeguarding consumer rights, such as privacy and transparency of information.

3. COMMITMENT FOR NATURE

Requirement 3.1: Environmental Compliance

 Business Partners hold and comply with current and valid legal permits and requirements relating to planning, development and business operations, with respect to the protection of the environment.

Requirement 3.2: Climate Action

- Business Partners support Bolton's Greenhouse Gas (GHG) emission calculations and provide available data when requested by Bolton. They adopt or plan to adopt monitoring systems to measure at least direct GHG emissions (Scope 1) and energy indirect GHG emissions (Scope 2) and are encouraged to measure Value Chain (Scope 3) emissions. They disclose in public documents data on GHG emissions monitored.
- Business Partners disclose their available policies, strategies and qualitative and quantitative data on GHG emissions measurement, risk management and opportunities associated with the effects of climate change.
- Business Partners define public GHG emissions reduction targets and a corresponding decarbonization roadmap.

Requirement 3.3: Circularity and Responsible Resource Use

- Business Partners take appropriate steps to minimize the consumption of natural resources.
- Business Partners are expected to drive progress towards a circular economy by applying the 5Rs approach: Reduce, Reuse, Repair, Recycle, Recover.
- Where relevant, Business Partners are expected to adopt circularity principles in the designing and manufacturing processes.
- Suppliers transparently provide information about the circularity-related features of the products and/or services provided when requested by Bolton.
- Business Partners comply with applicable laws and permits relating to the storage, handling and disposal of waste either directly or through waste sub-contractors.
- Business Partners minimize and prevent the production of waste, and they must dispose of any waste that cannot re-enter the economic cycle in a way that minimizes environmental impact.

Requirement 3.4: Biodiversity Protection

- Business Partners promote responsible practices for animal welfare. Bolton fosters suppliers who go beyond the minimum legal standards.
- Suppliers facilitate the traceability of products, components and raw materials with significant actual or potential impacts on biodiversity and ecosystems along the value chain.
- Where relevant, Business Partners are expected to identify relevant sites with regard to interaction with biodiversity and ecosystems and regularly monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity.
- Where relevant, suppliers only provide materials to Bolton sourced from places that are verified as deforestation or forest degradation-free, as defined in the EU Regulation on Deforestation.

Requirement 3.5: Water Stewardship

- Business Partners comply with applicable laws and permits relating to water, including but not limited to, water withdrawal, water usage, surface water management and effluent discharge.
- Business Partners support Bolton's water-related calculations and provide available data when requested by Bolton. They adopt or plan to adopt monitoring systems to measure at least water consumption, especially in areas of high-water stress.
- Business Partners preserve and responsibly pursue efforts for steward management
 of water resources, optimize water use, set targets to reduce water consumption and
 return water with adequate quality to the impacted ecosystem, with particular
 attention to areas of high-water stress or of high environmental and biodiversity value.
- Business Partners are expected to adopt solutions aimed at efficient water use and perform treatments to comply with local regulations.

4. COMMITMENT FOR PEOPLE

Requirement 4.1: Regular and Freely Chosen Employment

- Business Partners guarantee employees' right to join or leave employment freely
 within the terms of employment. There is no kind of forced, bonded or involuntary
 prison labor as defined by the reference ILO Conventions and Recommendations.
- Business Partners provide regular employment, to every extent possible, based on a recognized employment relationship established through national legislation and practice.
- Business Partners use contractual forms that meet the obligations to employees under labor or social security laws and regulations arising from the regular employment relationship, avoiding the excessive use of unfavorable forms (e.g. labor-only contracting, sub-contracting, apprenticeship schemes without real intent to impart skills or provide regular employment, excessive use of fixed-term contracts of employment, etc.).
- Business Partners do not require employees to lodge "deposits" or their identity papers. Where lodge of identity papers is legally required, worker's access to their documents is guaranteed. Workers are not prevented from leaving the workplace and their papers are returned immediately upon cessation of employment.

Requirement 4.2: Freedom of Association and Collective Bargaining

- Business Partners respect the right employees to be appropriately represented and
 to freely form and/or join Trade Unions, if existing by law, or workers' organizations of
 their own choosing and to bargain collectively. Where the right to freedom of
 association and collective bargaining is restricted under law, Business Partners seek
 ways to respect international human rights standards on freedom of association and
 collective bargaining, without contravening applicable laws and regulations at country
 level.
- Business partners ensure workers' representatives carry out their tasks without any consequence of prejudice, isolation, discrimination, harassment, intimidation or retaliation for being union members.
- Business Partners are committed to establishing a constructive dialogue with the workers' freely chosen representatives and an open attitude towards their activities, basing all negotiations on mutual respect and good faith.

Requirement 4.3: Health, Safety and Working Conditions

- Business Partners provide a healthy and safe working place and environment for all staff where the prevailing knowledge of the industry and any relevant specific hazard have been assessed, in compliance with current health and safety legislation. They are committed to keeping safe workplaces, by minimizing the risk of accident or injury and reducing the causes of hazards inherent in the working environment.
- Business Partners assign responsibilities for health and safety to a formal safety committee or a senior management representative of the facility / company.
- Business Partners are committed to involving staff in the continuous improvement of health and safety conditions of their workplaces in accordance with the local applicable laws and regulations.
- Business Partners guarantee employees' right to access preventive healthcare and to benefit from medical treatment even where conditions established by local laws and practices are limited.
- Business Partners provide employees with regular and recorded training on occupational health and safety and such training is repeated for new or reassigned workers.
- Business Partners provide access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

Requirement 4.4: No Child Labor

- Business Partners do not allow the use of child labour as it is defined by the reference ILO Conventions. Business partners do not employ children under the age of 16 and will not hire children under the local legal age for employment.
- Business Partners' policies and procedures shall conform to the provisions of the relevant ILO standards related to child labour. In case of direct or indirect child labour, Business Partners will take immediate action to identify and provide a remediation programme for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- Business Partners are committed to guaranteeing a suitable position for employees under the age of 18 as specified in the relevant ILO Conventions. This will prohibit them from working under hazardous conditions, work that is harmful to physical and mental development or working at night.

Requirement 4.5: Living Wages

- Business Partners offer remuneration that meets the national legal standards and industry benchmark standards, whichever is higher. In all cases, Business Partners are committed to creating favorable conditions for enabling living wages for workers to maintain a decent standard of living to meet the basic needs of the workers and their families and to provide some discretionary income to reach a living wage, when national legal standards do not provide for such an opportunity.
- Business Partners provide written and understandable information about employment conditions and particulars of wages each time employees are paid, in a language understood by workers and, if required, provide verbal explanations.
- Business Partners only apply withholdings from wages which have a legal basis and are in line and within the limits provided by local applicable law and/or collective agreements.

 Business Partners set disciplinary measures in accordance with local laws or regulations, or collective agreements, with the expressed permission of the worker concerned. Disciplinary measures should be recorded.

Requirement 4.6: Working Hours²

- Business Partners are committed to respecting weekly working hours provided for by the local legislation and collective agreement and to not exceed what is established by the ILO Conventions on this matter.
- Business Partners use overtime responsibly. Overtime shall be agreed and used responsibly, not to replace regular employment. Overtime shall be voluntary and compensated at a minimum rate of 125%, as suggested by ILO Conventions and, in any case, always aligned with local laws and collective bargaining agreements. Leave of absence in lieu of overtime payment for all workers shall only be permitted where agreed through a collective bargaining process.
- Business Partners are expected to guarantee regular working week. It shall not
 exceed 48 hours, except in exceptional circumstances. The sum of regular and
 overtime hours in a week shall not exceed 60 hours, except in extraordinary
 circumstances where all of the following are met:
 - This is allowed by national law and by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
 - o Appropriate safeguards are taken to protect the workers' health and safety;
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Business Partners respect adequate rest periods for the workers, granting at least one day off in any 7 day period or two days off during any 14 day period.

Requirement 4.7: Discrimination and Harsh Treatment

- Business Partners respect diversity and the right to equal opportunities. They do not tolerate any form of discrimination of race, colour, age, gender, language, religion, nationality, political opinion, sexual orientation, sexual disease status, caste or social status, marital status, union membership or political affiliation and they encourage the promotion of an ethical conduct within the workplace.
- Business Partners do not discriminate in hiring, compensation, access to training, promotion, termination or retirement.
- Business Partners undertake to promote and respect gender equity, including closing the gender pay gap, respecting maternity and paternity rights, ensuring equal access to training and promotion etc.
- Business Partners prohibit and do not tolerate any form of corporal punishment, mental or physical coercion, verbal abuse, sexual or psychological harassment, or harsh and inhumane treatment, as well as threats and intimidation at the workplace at large (offices, plants, vessels, journey to/from work, etc.).

Requirement 4.8: Rights of Local Population

 Business Partners respect the rights of the local populations inhabiting the areas where they operate, dedicating particular attention to the most vulnerable local communities, listening to their needs and providing opportunities and channels to communicate their needs and concerns at the local level.

² For Working Hours principle related to sea workers, the commitments to comply with are those set forth in the ILO 188C art 13 and 14: Morning and hours of rest.

Requirement 4.9: Conflict Minerals

 Business Partners take all reasonable steps to ensure that any products, components, or materials supplied to us that contain tin, tantalum, tungsten, or gold (3TG) are sourced responsibly, according to international responsible sourcing standards, set by the organisation for economic co-operation and development (OECD) and do not directly or indirectly contribute to armed conflict or serious human rights abuses.

5. RESPONSIBLE BUSINESS CONDUCT

Requirement 5.1: Fair Competition and Dealing

- Business Partners conduct business in full respect of the applicable rules and laws in the countries where they operate within a framework of openness, honesty, integrity, and good faith and reject practices that violate the principles of competition and the rules of the free market.
- Business Partners do not agree prices, use threats, offer or demand advantages as consideration for not participating in competitions or auctions.

Requirement 5.2: Integrity of Business Relationships and Fair Treatment

- Business Partners respect the principles of fairness, integrity, honesty, professional respectability, openness and mutual satisfaction.
- Business Partners not do business with anyone involved in illegal activities, verifying their reliability and professional reputation before any contractual agreement.

Requirement 5.3: Gifts, Hospitality and Entertainment

 Business Partners do not accept, solicit or request, for themselves or others, gifts, gratuities, benefits or other advantages that may be interpreted as a means of obtaining favourable treatment or undue advantage, or that may create the impression of illegality, corruption or immorality.

Requirement 5.4: Accounting Records, Financial Statements and other Business Reports

 Business Partners are responsible for documenting and recording transactions honestly and fairly, so that the company's financial statements and other company reports provide a true and fair view of financial position and performance. Books and records must be kept in all respects in accordance with applicable laws, accounting principles.

Requirement 5.5: Anti-bribery and Corruption

- Business Partners comply with all applicable local laws and and condemn corrupt practices, illegitimate favours, collusive behaviour, and the solicitation of advantages for themselves or the Company.
- Business Partners also condemn offers of payments, material benefits and other advantages of any kind to government representatives, public officials, public or private employees or their relatives for the purpose of influencing or compensating any official act, including in response to illegal pressure.

Requirement 5.6: Tax Compliance

 Business Partners comply with tax laws and regulations, avoid aggressive tax schemes and adopt strict control measures to prevent or limit disputes with tax authorities.

Requirement 5.7: Conflict of Interests

 Business Partners avoid situations and activities that could lead to a conflict of interest. They are also expected to promptly communicate any situation that is or may appear to be in conflict in any way with the interests of the contracting company.

Requirement 5.8: Privacy and Data Protection

- Business Partners respect the privacy of all individuals and their personal data, ensuring that the personal data and information of stakeholders, including employees, consumers and business partners, as well as data and information collected during business activities, remain confidential and are used properly.
- Business Partners ensure the collection and processing of personal data with respect for the fundamental rights, freedoms and dignity of the persons concerned and in compliance with the applicable legal provisions.

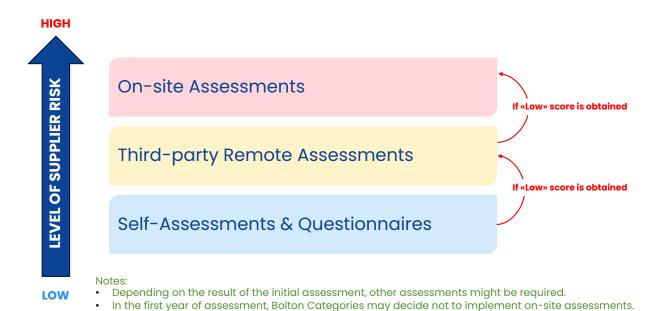
How We Conduct Due Diligence

Bolton is committed to conducting adequate due diligence to identify and assess the actual or potential adverse impacts on the environment and on human rights within our supply chains, and to design and implement preventive actions and remediation measures. A meaningful engagement of our Business Partners is enabled through a risk-based approach.

Bolton verifies alignment to and supports with the achievement of sustainability-related requirements, criteria and principles established in this document and in our Policy Framework following a four step approach.

- 1. **Supply Chain Mapping:** Bolton identifies the actors in its supply chain and their risk related factors by creating a list of direct and indirect suppliers and updating it annually.
- 2. Risk-Based Supplier Prioritization: Bolton's complex supply chains involve a significant number of suppliers. We aim for a meaningful assessment and engagement of our suppliers by prioritizing them based on their level of risk. As a starting point, the risk assessment will be performed at least on Direct, Tier 1 suppliers. In the future we will evaluate if and how to expand the scope to progressively cover the full supplier basis described on the Scope of Application. The risk assessment has the following characteristics:
 - a. It is based on Internal Factors including the suppliers' annual turnover, criticality and strategic relevance, supply-chain complexity and size; and External Factors including the suppliers' geographical location, industry and reputation.

- b. The risk assessment methodology and tools can be adjusted to meet industryspecific needs while remaining aligned with Group-level principles and guidelines.
- c. It is iterated on an annual basis.
- d. Bolton will increasingly pursue efforts to meaningfully engage local stakeholders throughout the risk assessment process, with a particular focus on suppliers identified as high risk in previous iterations of the assessment.
- e. It results in the classification of the suppliers identified in the annual supply chain mapping into three tiers: High Risk, Medium Risk and Low Risk.
- 3. Supplier Sustainability Performance Assessment: Bolton evaluates suppliers' sustainability-related performance based on the principles, criteria and requirements set out in this Responsible Business Partners Policy and the overall Policy Framework. Additional requirements can be integrated through industry-specific documents. The type of assessment depends on the suppliers' level of risk identified in the risk-based supplier prioritization, and the scope of application corresponds to that of step 2 (currently Direct, Tier 1 suppliers):
 - a. Low Risk Suppliers are assessed at least through self-assessments and questionnaires.
 - b. Medium Risk Suppliers are assessed at least through third-party remote assessments.
 - c. High Risk Suppliers are assessed at least through an on-site assessment. To reduce administrative burdens on its partners, Bolton could recognise the validity of suppliers-specific methodologies and tools aimed at monitoring the issues



Cases in which suppliers refuse to participate in the sustainability performance assessment will be discussed to define a case-by-case roadmap that prioritizes

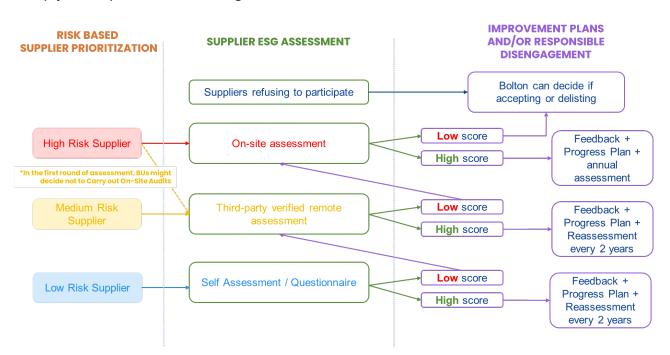
continuous improvement over delisting.

identified in this policy.

The Sustainability Performance Assessment results in a quantitative score that is classified as "High" (i.e., in line with Bolton's principles, criteria and requirements), "Medium" (i.e., partially in line with expectations) or "Low" (i.e., not in line with Bolton's expectations). Based on these results, Bolton defines the periodicity of the assessment. As a minimum requirement, it should be updated every two years.

4. **Improvement Plans:** After the periodic Sustainability Performance Assessment, where relevant, Bolton will provide feedback to suppliers and a step-by-step action plan with clear timelines to correct identified issues. Bolton is committed to a continuous improvement approach of its supply chain. We aim to minimize instances of delisting, considering it only as a last resort. Bolton oversees this process and meets periodically to address eventual criticalities with specific suppliers and to define a way forward for suppliers obtaining "Low" scores in third party assessments or onsite audits. If no meaningful remediation actions are undertaken by the supplier within a reasonable period (typically up to 3–5 years depending on severity), and especially in cases of serious, repeated non-compliance or a demonstrated unwillingness to improve, Bolton may decide to terminate the commercial and contractual relationship.

This approach, summarized in the figure below, allows for a tailored **due diligence process** that considers the specific characteristics and potential impact of each supplier. Bolton aims to ensure that the due diligence processes are aligned with international standards and comply with specific national regulations.



This comprehensive due diligence procedure aims to verify compliance with the Responsible Business Partners Policy and to foster a culture of continuous improvement and ethical business practices throughout Bolton's supply chain.

Reporting on Breaches

Bolton has set up a Speak Up Policy that regulates a comprehensive violation reporting mechanism for Whistleblowing Reports, including Grievances and outlines Bolton commitment to conducting business with fairness, integrity and respect for the law and for our values respecting People.

It establishes the procedure to be followed in the event of wrongdoing or violation of our Code of Conduct and Human Rights Policy, either internally or by Business Partners.

As described in the Speak Up Policy, the wrongdoing or the unethical behavoiour can be reported approching the relevant line manager/supervisor or HR/local operational onsite compliant mechanisms or using the Bolton Speak Up platform (or calling the toll free phone number) that allows to raise concerns also anonymously.

Processing of personal data will be managed in accordance with Regulation (EU) 2016/679 (GDPR), as well as any other applicable laws and/or regulations, including local ones. Both personal data of the Whistleblower - if the Whistleblowing Report is not anonymous - and the personal data of the Person Involved and/or of any third parties, will be processed, as well as any further information collected in the context of the investigation that is necessary and appropriate to ascertain and verify the merits or otherwise of the Whistleblowing Report.

All submitted reports are treated confidentially.

HOW TO FIX BREACHES?

If remediation is required, suppliers, business partner and non-profit organizations will create and inform Bolton of their corrective action and implementation plans and timeline to resolve the breach effectively and promptly; we will collaborate and work together with the supplier in order to identify the root causes of the problem, find effective ways to correct them, help to implement those measures and verify their effectiveness.

We are committed to collaborating with Business Partners for a long-term positive change. This may include support and guidance to strengthen understanding of and capability to implement this Policy's Requirements.





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