

BOLTON AI POLICY

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Table of Contents

1. Introduction.....	3
2. Purpose and Scope	3
3. General principles	4
4. Governance	5
5. Authorization Process	5
6. Do's and Don'ts	6
7. Monitoring and updates.....	9

1. Introduction

The Bolton Group ("**Bolton**") is a corporate group operating in the consumer goods sector, consisting of the parent company Bolton Group S.r.l. ("**Parent Company**") and other companies based in Italy, within the European Economic Area, and outside of it (each "**Company**").

Bolton has implemented this artificial intelligence policy ("**Policy**") with the aim of aligning with Regulation (EU) 2024/1689 ("**AI Act**"), Italian Law no. 132 of 23 September 2025 ("**Italian AI Law**") and any other guidance, instructions and recommended practices issued by competent authorities and institutions within the European Economic Area in the field of artificial intelligence ("**Applicable Law**").

Although they may not be directly subject to the Applicable Law, non-Italian Companies agree to respect its principles and provisions to the extent compatible with local laws and business operations.

2. Purpose and Scope

This Policy is addressed to the Bolton Staff (as defined below) and its purpose is to provide them with: (i) an overview of the main principles related to Artificial Intelligence ("**AI**"); (ii) information on the governance framework established within Bolton for the development and/or procurement of artificial intelligence systems ("**AI Systems**")¹; (iii) guidance on the authorization process to be followed when the need arises to develop/procure an AI System; and (iv) rules of conduct to be observed while using the Authorized AI Systems (as defined below).

Furthermore, this Policy needs to be read in conjunction with the Bolton Artificial Policy Operating Procedure that clarifies how the AI Steward and AI Champions (as below defined) shall act upon the principles of this Policy. Furthermore this Policy is without prejudice to other existing procedures, policies, and internal regulations of Bolton, which remain fully applicable and must be complied with alongside this Policy (e.g., master data protection policy, IT policy). Where any inconsistencies or overlaps arise, appropriate coordination and escalation mechanisms shall be followed to ensure coherence and compliance across all frameworks.

Unless expressly stated otherwise, this Policy refers to definitions set out in the Applicable Law.

Failure to comply with this Policy may result in disciplinary actions, in accordance with applicable internal policies and local employment regulations, as well as potential legal liabilities both for the Staff and Bolton².

¹Defined as "a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments" according to Article 5 of the AI Act.

² Which may be subject to sanctions (by way of example, fines up to 7 % of its total worldwide annual turnover).

3. General principles

In order to protect Bolton assets and reputation this Policy provides that Bolton Staff shall use only AI systems expressly authorized by Bolton and the use shall be in compliance with the content of this Policy; the relevant authorization process to be followed is specified in the further sections of this Policy and more specifically in paragraph 5 below.

All AI Systems-related activities shall be guided by a set of general principles aimed at ensuring responsible and compliant handling of AI. Such principles are drawn from Applicable Law, as well as Bolton's core values.

More in particular, Bolton is committed to respecting the following general principles:

- **Human agency and oversight** – AI Systems must support human autonomy and decision-making and must be subject to appropriate human oversight throughout their lifecycle;
- **Technical robustness and safety** – AI Systems must be resilient, reliable, and secure;
- **Transparency** – AI Systems must be explainable and auditable. Where applicable, individuals must be informed that they are interacting with an AI System and be provided with meaningful explanations about its outcomes, particularly where such outcomes may affect them;
- **Diversity and non-discrimination** – AI Systems must promote inclusion and avoid unfair bias;
- **Societal and environmental well-being** – AI Systems should benefit, in addition to Bolton's interests, individuals and society at large;
- **Accountability** – all AI Systems-related activities must be governed by clear roles, responsibilities, and procedures to ensure accountability;
- **Protection of personal data** – all personal data involved in the context of AI Systems must be processed in accordance with the principles of Regulation (EU) 2016/679, namely: privacy by design & by default; lawfulness, fairness and transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity, security and confidentiality;
- **Protection of intellectual property rights** – AI Systems-related activities must respect intellectual property rights, including copyrights, trademarks, patents, trade secrets, and design rights. This includes ensuring that any AI Systems-related activity: (i) does not unlawfully use or reproduce third-party protected content; (ii) complies with appropriate licenses; and (iii) more generally, takes into account authorship, protectability, and potential legal limitations.

4. Governance

Bolton has identified a governance structure composed of the following roles:

- **AI Steward** – appointed within the Parent Company, the AI Steward is an individual whose primary task is to implement this Policy and act as a point of contact for all AI Champions. Where relevant, the AI Steward may involve any departments / areas / divisions of Bolton;
- **AI Champions** – IT and/or Digital specialists within each Bolton's divisions (e.g., Food, HPBC, etc.) are designated as AI Champions. Their primary responsibilities are: (i) acting as a point of contact for the Staff in relation to all matters related to AI Systems (including any need to develop or procure new AI Systems); (ii) reporting to the AI Steward any commercial or technical initiative involving the development and/or procurement of new AI Systems, or events related to existing ones (e.g., changes, incidents), in order to initiate the authorization process described in paragraph 5; and (iii) collaborating with the AI Steward to ensure the proper implementation of this Policy;
- **Directors and Managers** – they are responsible for ensuring that Staff carry out activities within their area of responsibility in line with instructions given by Bolton. In this respect, together with the Legal & Compliance Department, they have to foster a culture of integrity and accountability, by leading by example, by supporting employees who have questions or concerns, by ensuring that their teams are properly trained, and by promoting Bolton standards among stakeholders.
- **Staff** – Bolton's personnel, required to comply with this Policy.

This governance structure is designed to: (i) ensure the correct implementation of this Policy and the other relevant documentation across different Companies (since Bolton's divisions include representatives of relevant Companies); and (ii) support the establishment of a common framework, with the aim of promoting consistency, coordination, and alignment with Bolton's overall strategy and values.

Names and contact details of the AI Officer and AI Champions are made available and kept up to date on the list uploaded on Bolton's intranet.

5. Authorization Process

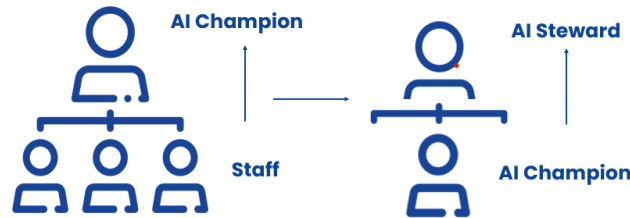
Staff, either as individual employees or on behalf of a department, who identify a business need to develop and/or purchase an AI System within the scope of their work activities must first contact the AI Champion within their respective Bolton division, who shall, in turn, inform the AI Steward.

The AI Steward and the AI Champion will assess whether the business need is already met by an existing approved AI System.

If not, the adoption of the proposed AI System remains subject to further technical and legal evaluations as specified in the Bolton AI Operating Procedure.

Only AI Systems that have received positive outcomes in both the “need” and “risk assessment” evaluations shall qualify as Authorized AI Systems (“**Authorized AI Systems**”).

Technical and legal assessments shall be run in accordance with the Bolton AI Operating Procedure addressed to the AI Steward and AI Champions.



6. Do’s and Don’ts

The following golden rules must be followed by Staff while using Authorized AI Systems.

1. Use only Authorized AI Systems

Only use Authorized AI Systems. Do not access or experiment with external, unapproved AI Systems, even if they are free or publicly available.

Example: If Bolton authorizes the use of a specific AI System for translations, do not use another online AI translator on your own initiative.

2. Work-only use

Use of AI Authorized Systems is strictly limited to activities directly related to your job responsibilities and assigned duties. You must not use Bolton Authorized AI Systems for personal purposes or on behalf of third parties (e.g., colleagues). Avoid exploring unrelated topics or using Authorized AI Systems for testing outside scope of your duties. Furthermore, do not use Authorized AI Systems for the following practices: subliminal, manipulative or deceptive techniques; exploitation of vulnerabilities; social scoring; criminal risk assessments; real-time remote facial recognition in public spaces; emotion inference in workplace or education; mass biometric scraping; biometric categorization based on sensitive or protected attributes³.

Example: You can use Authorized AI Systems to search for info, provide you with ideas, translate, summarize information, etc.

Example: If you work in marketing, do not use Authorized AI Systems to generate legal clauses (ask the Legal and Compliance department instead).

Example: You can use Authorized AI Systems to draft slides’ content, but you cannot use it to draft a personal letter.

³ For further details, please refer to the applicable legal and regulatory sources, including the EU Artificial Intelligence Act (Regulation (EU) 2024/1689) – <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1689>

3. Limit personal data

Limit the disclosure of any personal data in prompts or documents, such as names, images, emails, phone numbers, ID numbers, or other identifiable information of clients, other employees, or third parties. Alternatively, anonymize the content before putting it into the prompt.

Example: Instead of writing "Summarize this email from John Smith," write "Summarize this email from a provider's representative" and remove all information that can potentially identify him (e.g., name of the company, roles of the representative within the company).

4. Limit confidential or strategic business information

Limit the disclosure of confidential data such as client lists, business plans, pricing strategies, M&A discussions, internal KPIs or, more generally, sensitive information.

Example: Avoid uploading a document about next quarter's business development strategy.

5. Limit the disclosure of content protected by intellectual property

Limit entering into prompts or uploading content protected by IP rights or know-how of Bolton or third-parties, including unpublished code, research models, confidential templates, or copyrightable / patentable materials.

Example: Do not paste an image of a Bolton's product that is being developed into the Authorized AI System to "check for ideas / improvements".

6. Always validate outputs

Authorized AI System may hallucinate, provide wrong and / or outdated information, or fabricated data. Always verify accuracy before using the output in work products. All outputs must be treated as drafts.

Example: If the Authorized AI System suggests a regulatory citation, double-check the citation with the official source before including it in a client email.

7. Do not use it for legal or business advice

Do not rely on outputs to interpret laws, advise clients, or make binding business decisions. Use them only as a support tool, not a source of authority. Always double-check information.

Example: You may use the Authorized AI System to assist in the preparation of a specific business plan, but do not let it take a decision on your behalf.

8. Flag hallucinations, errors and incidents

If the Authorized AI System provides an incorrect or nonsensical response, hallucinate or, more generally, operates in a way that it is not supposed to, report it immediately to the AI Champion of your division.

Example: *The Authorized AI System discloses to you information inserted by one of your colleagues.*

9. Protect login credentials

Never share your access credentials with others, and do not allow anyone to use the Authorized AI System through your account.

Example: *Do not accommodate a colleague asking to “quickly use your login” to run a prompt.*

10. Reporting obligations

If you believe there have been anomalies, hallucinations, malfunctions, or outputs that may cause harm or result in non-compliance with Applicable Law or this Policy (“**Incidents**”), or if misuse of the Authorized AI System by you or a colleague or, more generally, any breach of rules in this Policy has occurred, report it immediately to the relevant AI Champion, who will escalate it to the AI Steward. Before proceeding, consult also the [Bolton Whistleblowing & Speak-up Policy](#) for more specific reporting channels.

Example: *You become aware that one of your colleagues is systematically uploading sensitive content to the Authorized AI System.*

11. Be transparent

Always use Authorized AI Systems responsibly. Do not present or imply that the output was generated solely by a human.

Example: *If a certain document has been elaborated with the support of an Authorized AI System do not say it has not.*

12. Comply with policies

In general, use Authorized AI Systems in accordance with all applicable Bolton internal policies and rules.

Example: *Respect Bolton internal data protection policies on data breach, usage of Bolton’s computers and devices, etc.*

13. Stay trained and updated

You are always expected to participate in any internal training related to AI Systems (including the authorized ones) and remain informed of changes to usage rules or policies.

Example: *Although you do not prefer to use Authorized AI Systems, do not miss internal training about them.*

7. Monitoring and updates

This Policy is a living document subject to periodic review and update to reflect changes in Applicable Law, technological advancements, and Bolton's operational needs.

The AI Steward, also with the support of AI Champions and Legal and Compliance department, is responsible for initiating reviews, where necessary.

The latest version of this Policy is always available for consultation on Bolton's intranet.

In a nutshell

DO's

- ✓ Use only Authorized AI Systems
- ✓ Use Authorized AI Systems only for work-related tasks directly linked to your role
- ✓ Limit the inclusion of personal data in prompts
- ✓ Protect confidential and strategic info
- ✓ Respect IP rights
- ✓ Treat outputs as drafts
- ✓ Use Authorized AI systems as support tools only
- ✓ Report hallucinations, errors, or anomalies to the AI Champion
- ✓ Keep your login credentials secure and personal
- ✓ Report any incidents, misuse or non-compliance by yourself or colleagues to Directors and Managers or through Bolton Speak-up
- ✓ Be transparent: acknowledge AI involvement when relevant
- ✓ Follow all internal Bolton policies and rules
- ✓ Participate in trainings and stay updated on policies

DON'Ts

- ✗ Do not use external and not authorized AI Systems
- ✗ Do not use Authorized AI Systems for personal purposes
- ✗ Do not provide AI Systems with names, emails, phone numbers, IDs, or other personal data unless strictly necessary
- ✗ Do not provide AI Systems with client lists, business plans, pricing, M&A data, or other sensitive and confidential info
- ✗ Limit uploading Bolton or third-party IP
- ✗ Do not assume AI outputs are correct
- ✗ Do not rely only on outputs
- ✗ Do not ignore or conceal incorrect/nonsensical outputs
- ✗ Do not share access credentials or allow others to use your account
- ✗ Do not cover up improper uses of Authorized AI systems
- ✗ Do not present AI-generated content as solely human-made
- ✗ Do not bypass or contradict internal policies on IT, data, or confidentiality
- ✗ Do not skip mandatory AI-related trainings or ignore updated guidance



THINK BEFORE YOU PRINT



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