



BOLTON WHISTLEBLOWING AND SPEAKUP POLICY





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FOREWORDS

Bolton is a multinational company that has been producing and marketing a wide range of innovative, sustainable and high-quality consumer branded products for over 75 years.

Bolton is committed to conducting its business with fairness, integrity, compliance with the law and its values with respect for the planet and people, starting from its Code of Conduct and its Human Rights Policy and the organizational and control models, where adopted by the individual subsidiaries.

Bolton expects all its employees and collaborators, in any capacity, and partners to act responsibly and with integrity, values transparency and encourages an environment of mutual listening.

This “*Whistleblowing and Speak Up Policy*” of Bolton (hereinafter, the “**Policy**”) outlines the procedure to be followed in cases where misconduct or breaches are observed or suspected. The Policy applies to both individuals within the organization and to external third parties.

Therefore, if anyone becomes aware of, or has reasonable grounds to suspect, any improper, unethical, or unlawful behavior in the workplace, they are encouraged to report it. Doing so gives Bolton the opportunity to take all necessary measures to, among other things, address potential wrongdoing, reduce reputational risks to the company and its employees and collaborators, and ensure a safe and inclusive working environment for everyone.

To this end, it is also reminded that individuals may always contact their direct manager or the relevant departments (Human Resources and Legal & Compliance) for any need or clarification.

This Policy protects the anonymity of the Reporting person (as defined below) and Bolton will not tolerate any form of retaliation against them reporting in good faith a concern. At the same time, malicious or knowingly false reports may result in serious consequences for the Reporting person, including disciplinary action if the Reporting person is an employee.

The Policy aims to ensure compliance with the various local laws and regulations applicable to Bolton subsidiaries regarding, among other things, human rights protection, privacy safeguards, and the prevention of any unlawful limitation of individual rights.

For Bolton’s European subsidiaries, the Policy has also been drafted to comply with



Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and corresponding national provisions. Moreover, for Italian subsidiaries, the Policy forms an integral part of the organization, management, and control model adopted pursuant to Legislative Decree No. 231 of 8 June 2001, as subsequently amended (hereinafter, the "**Model 231**").



PART I – GENERAL

1. Background and objective

Bolton has established a unique and comprehensive reporting system to consistently manage any Whistleblowing Breaches and Grievances (as defined below).

The objective of this Policy is to:

- define the matters that can be reported;
- provide operational guidance that the Reporting person (as defined below) must follow in order to submit a Report of a Breach (as defined below);
- describe the management of Reports (as defined below), including the receipt, analysis and management of the Report;
- identify the roles and responsibilities of the functions and bodies involved in the reporting process;
- specify the protections granted to the Reporting person, as well as the potential liabilities that may arise in the case of malicious or grossly negligent Reports that prove to be false or unfounded;
- explain the measures envisaged to protect the persons subject to the Report and other parties involved in the Report in various capacities.

2. Scope of application

This procedure is adopted by Bolton (as defined below), and applies to the Internal and External Parties (as defined below).

3. Definitions

Bolton	The Bolton Group (Bolton Group S.r.l. and its subsidiaries).
External Party (or External Subject)	Who is in external relations with Bolton, such as: <ul style="list-style-type: none">- external collaborators, self-employed



workers, independent professionals, consultants, clients, suppliers, agents, or business partners (current, potential, or former);

- candidates who have become aware of unlawful conduct during the recruitment process;
- former employees who became aware of unlawful conduct while still engaged in a relationship with Bolton.

Internal Party (or Internal Subject)

Anyone who has an internal relationship with Bolton, such as:

- employees (including those on probation), temporary agency workers, and interns;
- individuals holding positions of representation, administration, or management, or those who exercise management or control over company activities; members of the Board of Statutory Auditors, members of the Supervisory Body, or other control or oversight bodies that may exist within the subsidiaries.

Functions

Bolton's internal organizational structures globally or its individual subsidiaries locally, with skills/responsibilities in a specific sector/service, such as functions *Compliance, Human Resources (HR), Internal Audit, Legal, Finance* etc.

Whistleblowing Breaches

Any behavior, act or omission that harms interest public or integrity of the public administration or of Bolton and, in particular:

- illicit activities related to the following sectors: public procurement, financial services, products and markets, and



prevention of money laundering and terrorist financing; 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; protection of personal life, personal data protection, and the security of networks and information systems;

- acts or omissions affecting the financial interests of the European Union (for Bolton's subsidiaries in Europe);
- acts or omissions concerning the internal market, including breaches of EU competition and state aid rules, as well as breaches of corporate tax rules or mechanisms designed to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax rules (for Bolton's subsidiaries in Europe);
- administrative, accounting, civil or criminal offences not included among those indicated above;
- significant unlawful conduct pursuant to Legislative Decree no. 231 of 8 June 2001 or breaches of the relevant Model 231 not included among the offences indicated above (for Bolton's Italian subsidiaries);
- other offences provided for by Legislative Decree no. 23/2024 (for Bolton's Italian subsidiaries);

Grievances

Breaches concerning:



- disputes, claims or requests related to a personal interest of the Reporting person or of the person who has filed a complaint with the judicial or accounting authority that relate exclusively to his or her individual employment relationships, or inherent to his or her employment relationships with hierarchically superior figures;
- breaches already governed by specific local regulations on finance, anti-money laundering and countering the financing of terrorism;
- breaches in the field of national security, except (for Bolton's subsidiaries in Europe) breaches of EU provisions, as such falling under Whistleblowing Breaches;
- violations of human rights not covered by those described in the Whistleblowing Breaches.

Information on Breaches	Information, including grounded suspicions, regarding Breaches committed or which, on the basis of concrete evidence, may be committed within Bolton's organization, as well as elements concerning conduct aimed at concealing such Breaches.
Report	<p>Any communication of Information on Breaches, whether Whistleblowing or Grievance.</p> <p>The Report concerning Whistleblowing Breaches pursuant to Directive (EU) 1937/2019 can be:</p> <ul style="list-style-type: none">- Internal, if provided in accordance with the channels described in this Policy;



	<ul style="list-style-type: none">- External, if submitted through the channel set up at the competent national authority at local level (e.g., for Italy, ANAC - National Anti-Corruption Authority).
Public Disclosure	Any conduct that is likely to make Information on Breaches publicly available in the press, electronic or other means of dissemination that is likely to reach a large number of people.
Person concerned	The person or entity named in the Report or Public Disclosure as the person to whom the Breaches are attributed or as a person otherwise implicated, for example because they are informed of the facts.
Reporter or Reporting person	The individual (Internal or External Party) who makes the Reporting or Public Disclosure of Information on Breaches acquired in the context of his or her work-related context.
Reporting channel	The channel through which the Report is sent.
Work-related context	Employment or collaboration relationship between the Reporting person and Bolton, present or past, in which, regardless of the nature of the activity carried out, the individual (Internal or External Party) acquires Information on the Breaches and for which he or she may suffer retaliation in the event of a Report, Public Disclosure or report to the competent authorities.
Facilitator	An individual who, pursuant to Directive (EU) 2019/1937, assists the Reporting person in the Reporting process, operating within the same Work-related Context and whose assistance must be



	kept confidential.
Speak Up Manager	The person(s) formally appointed to manage the internal Reporting channel as identified in this Policy.
Follow-up	The action taken by the Speak Up Manager to assess the existence of the facts reported outcome of the investigations and any measures taken or to be adopted.
Retaliation	Any behaviour, act or omission, even if only attempted or threatened, committed as a result of the Report that causes or is likely to cause, directly or indirectly, unjust damage to the Reporting Person.

4. Principles

The parties involved in various capacities in the activities governed by this Policy must operate in compliance with the relevant legal, regulatory and corporate provisions, among other things by observing the principles established below:

Transparency

The management of Reports must be such as to guarantee transparency in the conduct and timely, complete and truthful communication of their process to ensure effective control and monitoring.

Impartiality, independence and professionalism

The Reports must be managed in such a way as to ensure the maintenance of the necessary conditions of independence and compliance with the diligence required in terms of objectivity, competence and professionalism. Therefore, the subjects in charge of the managing of the Reports assume all responsibility for their own choices, including that of whether or not to Follow-up on the Report.

Confidentiality on Reports and on the identity of the Reporting person

The Reports and the Reporting person's data will be processed only by the parties



duly authorized to process the personal data of the Reporting person, the Facilitator and all the Persons concerned, pursuant to the applicable legislation on the protection of personal data.

The Reports and the Reporting person's data, in particular, will be collected by the Speak Up Manager and may only be communicated to the subjects involved in the management of the Report as indicated in Part II of the Policy, as well as to external consultants and professionals that Bolton may use, in compliance with the provisions of the law on the protection of personal data, to Follow-up on the Report.

With regard to Bolton's Italian subsidiaries, it should be noted that in the case of Whistleblowing Reports, Law no. 24/2023 establishes that the identity of the Reporting Person and any other information from which such identity may be inferred, directly or indirectly, may not be revealed, without the express consent of the same, to parties other than those indicated above. This is without prejudice to communication to public bodies and public authorities (including administrative, judicial and public security authorities), if the conditions are met or communication is necessary to comply with an order of the authority itself or a legal obligation. Furthermore, the identity of the Reporting person may not be revealed even in the context of disciplinary proceedings that may arise from the Report, if the challenge to the disciplinary charge is based on separate and additional investigations with respect to the Report, even if consequent to the same. If, the disciplinary complaint is based instead, in whole or in part, on the Report and knowledge of the identity of the Reporting person is indispensable for the defense of the accused, the Report will be usable for the purposes of the disciplinary proceedings only in the presence of the express consent of the Reporting person to the disclosure of his or her identity. In the latter case, the Reporting person will be notified in writing of the reasons for the disclosure of their confidential data; similar communication will be provided if the disclosure of his/her identity and the information from which it may be derived, directly or indirectly, is indispensable for the purposes of the defense of any Person concerned. The Reporting person must be aware that failure to consent to reveal his/her identity for the purposes illustrated above could prevent the Report from being fully followed up.

Prohibition of retaliation

The Reporting Person will be protected in all contexts, from the moment of receipt of the Report and at every subsequent stage, regardless of the reasons for which he or she made the Report. Such protection will be provided that:

- at the time of the Report, the Reporting person had grounded reasons to believe that the Information on Breaches was true;

- the Report has been made in compliance with the provisions of this Policy.

Based on the principle of "prohibition of retaliation", it is not permitted to adopt the following measures against the Reporting person, *inter alia*, where these are determined by the sending of the Report:

- dismissal, non-disciplinary suspension from work or other equivalent measure;
- demotion or failure to promote where promised or agreed;
- change of duties or place of work;
- reduction of remuneration or working hours or different allocation of working hours in the case of part-time employees;
- suspension of training or any restriction on access to it;
- demerit notes or negative references;
- adoption of disciplinary measures;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavourable treatment;
- failure to confirm in service (in the case of a probationary agreement, apprenticeship contract or fixed-term employment contract or other equivalent situation) motivated solely by the Report;
- request to undergo psychiatric or medical examinations;
- conduct that may result in damage or reputational damage also through the communication or dissemination of news, by any means;
- early termination or cancellation of a contract for the supply of goods or services (in the event that the Reporting person is an External Party);
- revocation of a license or permit.

Any retaliatory or discriminatory actions against the Reporting person will be severely prosecuted by Bolton and may expose the person who has carried them out, in addition to the consequences of the law (including compensation for damages), to disciplinary sanctions on the basis of the provisions of the law in force, the employment contract applied and the company regulations on the subject, if this person is an employee. In addition, any penalties and liability for damages or indemnities that Bolton may incur as a result of such retaliatory or discriminatory actions will be attributed to the person who carried them out.

The Facilitator is entitled to the same protections provided for the Reporting person.

Breaches of the principles of transparency, impartiality, independence and



professionalism, confidentiality and prohibition of retaliation may be a source of disciplinary, civil and/or, if the conditions are met, criminal liability.



PART II – WHISTLEBLOWING AND GRIEVANCE BREACHES REPORTING PROCESS

1. [HOW] Content of the Report

The Report must contain specific and well-founded Information regarding the alleged Breaches, based on precise and consistent factual elements.

In particular, the Report should include the following details:

- the Reporting person's personal information (name, surname, telephone number, email address, and—if the Reporting person is an employee—the name of the Bolton subsidiary where they work and their job position);
- a description of the reported facts, including the time, place, and circumstances in which the event occurred, as well as how the Reporting person became aware of it;
- if known, the identity or any elements allowing the identification of the person(s) alleged to have committed the Breaches (such as personal details, role, and/or any other identifying information);
- any other individuals who may be able to provide information on the reported facts and any documents supporting the validity of those facts;
- any additional documents or information that may help verify the existence of the reported facts;
- any further information that may provide useful evidence to support the reported facts.

Anonymous Reports that are specific, detailed, and supported by adequate documentation may be treated as identified Reports and, as such, may be processed in accordance with this Policy.

Anonymous Reports concerning Whistleblowing Breaches will be recorded in a dedicated section of a register properly adopted (hereinafter the "**Register of Reports**"), and any supporting documentation received must be properly stored, in compliance with the principles set out in paragraph 4 of Part I above. If the anonymous Reporting person is subsequently identified, the corresponding Report will be handled as a named Whistleblowing Report, and the Reporting person will be granted the protections provided for under Directive (EU) 2019/1937 and the



applicable local legislation.

2. [WHO] Subjects of the reporting process

Reporting person

The Reporting of Whistleblowing Breaches and Grievances can be carried out by both Internal and External Parties, as defined in paragraph 3 of Part I above.

Speak Up Manager

The management of the Reporting channel is entrusted to the Speak Up Manager, who will be an impartial, autonomous figure in charge of the Reporting channel.

The role of Speak Up Manager will be specifically held by the Chief Legal and Compliance Officer and the Group Compliance Director, who will be duly authorized to process personal data, receive appropriate training, and will have the following responsibilities:

- will be responsible for the Speak Up and Whistleblowing system, the related processes and tools, including the Reporting channel;
- will be responsible for defining and constantly updating the process and maintaining/correctly functioning the Reporting channel;
- to ensure information and knowledge of the Reporting channel and the functioning of the Reporting process, *inter alia* by ensuring that adequate publicity is given to this Policy;
- to ensure the coordination and involvement of all the actors involved in the Reporting process, both at local and group level;
- to ensure the monitoring of regulatory updates and their implementation by the individual Bolton subsidiaries;
- they will promptly send the Reports of interest to the local supervisory body (if any) on the basis of the preliminary assessments carried out;
- they will receive the Reports and carry out an initial assessment to deal with them correctly (Triage);
- they will continue to dialogue with the Reporting person, requesting, if necessary, the appropriate additions;
- provide information/report to interested parties, if deemed relevant following the assessments carried out;
- to ensure that all the necessary checks and investigations are carried out on the



facts subject to the Report;

- will track the status of implementation of corrective actions and in general of the initiatives undertaken;
- will be responsible for the management of Reports.

Corporate functions potentially involved

For the purpose of ensuring the most effective management of the Report, the Speak Up Manager may involve other Bolton functions (such as HR, Legal, Internal Audit, Finance, etc.), both at the local and group level, so that these functions may, among other things:

- Support the Speak Up Manager during the investigation, analysis, and assessment phases of the Report;
- Evaluate the potential impacts of the Report within their respective areas of responsibility;
- Provide recommendations regarding the adoption of appropriate corrective actions for the business areas and processes affected by the Report;
- Monitor the implementation status of the corrective actions and, more generally, of the initiatives undertaken;
- Ensure the implementation of protective measures for the Reporting person, the Facilitator, and, where necessary, the Persons concerned (with reference to the HR function);
- Manage any disciplinary or sanctioning proceedings (with reference to the HR and Legal functions).

In addition, where deemed appropriate for the investigation phase, the Speak Up Manager may also involve the line manager of the Person concerned and/or of the Reporting persons (if employees). In such cases, the line manager may also define the action plan relating to the areas and processes affected by the Report.

3. [HOW] Reporting channels

Bolton has set up the following internal Reporting channels:

REPORTING PLATFORM

Bolton has equipped itself with an IT platform called "Bolton Speak Up", the link to which can be found on the online website www.bolton.com (hereinafter, the



"Platform").

Specifically, the Platform allows the Reporter to select two options, depending on the type of Breach:

- Whistleblowing Breaches, defined as «*Breaches of public importance of national or EU provisions that harm the public interest or the integrity of one or more of the Bolton Companies (i.e.: breaches of the Bolton Code of Conduct that are detected at the collective level; collective human rights violations; environmental, financial or food crimes; terrorism; breaches in the areas of public procurement, public safety and health, consumer rights, privacy, etc.)*», (Directive (EU) 2019/1937 and local laws); and
- Reports for Grievances, defined as «*Breaches of individual rights and situations in the employment context of the Bolton Companies (i.e.: breaches of the Bolton Code of Conduct that are relevant at the individual level; mobbing and harassment at work; situations of interpersonal conflict, etc.)*» (UN Guiding Principles on Business and Human Rights).

The two types of Reports will be managed separately, as Reports for Whistleblowing Breaches will be assisted, where applicable, by the additional guarantees set out in Directive (EU) 1937/2019 and applicable local regulations.

The Platform will direct the Reporting person to one or the other type of report and will ask them to fill in a form describing the event covered by the Report which, once completed, will be forwarded to the Speak Up Manager for the relevant taking charge.

Each Report will be marked with an identification code, so as to allow the Reporting person to follow its management step by step.

TOLL-FREE TELEPHONE NUMBER

Reports can be made, alternatively, by contacting the toll-free number (hereinafter, the "**Toll-Free Number**"), available 24 hours a day, 7 days a week.

The Toll-Free Number is associated with an automatic responder that will direct the Reporting person to the correct type of Report (whether for Whistleblowing or Grievance Breaches) and will guide them in the reporting process.

The automatic reply will contain the following message: «*Welcome to the confidential "Whistleblowing and Speak Up" line, where you can report suspected breaches of whistleblowing regulations and breaches grievances, i.e. breaches*



concerning individual rights and situations in the working context of the Bolton Companies. Please provide detailed information on the subject of your report (including where and when the event took place and who is involved) and provide us with your contact details so that we can contact you (name, position in the Bolton organization, telephone number, address e-mail). Your call will be treated confidentially, as will any information you provide to us. In any case, it is possible to report anonymously. The report will be recorded with voice masking and will be transcribed on the Whistleblowing and Speak Up platform in use at Bolton. For information on the processing of your personal data and your rights, please consult the privacy policy on the entry page of the aforementioned platform, where you will also find the link to the "Whistleblowing and Speak Up Policy of Bolton", which contains all the necessary information.

The call will be automatically transcribed in a special section of the Platform and can be recorded with voice masking, so as not to make the Reporting person recognizable.

The Reporting person will be assigned a code, which they must enter or state aloud every time they wish to check the status of the Report or verify its progress.

* * *

All Reports, made both in writing through the Platform and orally through the Toll-Free Number, will be taken care of if they are submitted in accordance with the provisions of the Policy.

In the event that the Report has been mistakenly qualified as a Whistleblowing Breaches Report instead of Grievance or vice versa, the Speak Up Manager will direct the Report to the correct management system, notifying the Reporting person.

The Reporting person will be asked to provide their personal and contact information, and will therefore be provided with an appropriate privacy notice. In any case, the Reporting person will have the option to choose the anonymous reporting method.

In the event that the Reporting person provides his/her e-mail address, the Reporting person will be notified of any updates on the status of the Reporting person, the content of which must then be verified by accessing the Platform or through the Toll-Free Number, depending on the manner in which the Report was made. If, on the other hand, the Reporter has not provided an e-mail address, in order to know the status of the Report, the Reporting person must be diligent by accessing the Platform or by contacting the Toll-Free Number, depending on the manner in which he made the Report.



4. [WHAT] Procedures for managing Reports

Internal Reports

Once the Report has been received, it will be subject to analysis and verification of the facts indicated therein by the Speak Up Manager, who:

- will preliminarily verify whether the Reporting person has correctly addressed the Report, in light of the type of Breaches (whether Whistleblowing Breach or Grievance);
- will reply to the Reporting person immediately and, in any case, within 7 days of receipt of the Report. In the event that it has detected an incorrect address of the Report, it will channel the Report to the correct address, giving prior notice to the Reporting person;
- will promptly take action to verify the object, truthfulness and seriousness of the Report received, if necessary, also by requesting further additions in writing from the Reporting person;
- if it deems it necessary, or is requested by the Reporting person, it will organize a meeting with the latter, in person or remotely;
- if it deems it necessary, it will summon the Persons concerned;
- keep track of all activities carried out;
- will take all necessary measures to ensure the confidentiality of the Reporting person, any Persons concerned, the Report and the Information on the Breach contained therein, as well as the documentation received, the minutes made, etc.;
- once it has received all the information deemed relevant, it will inform Bolton's HR (if the Report is for persons who have an employment/collaboration relationship with Bolton) and/or other functions, including line manager, depending on the concrete situation so that the initiatives to be taken can be assessed (further investigations, disciplinary and/or legal action, etc.); if the legal requirements are met, the Speak Up Manager will also inform the local Supervisory Body of the company, where present and;
- within 3 months of the Report, it will inform the Reporting person of the outcome of the Report itself, as well as of any actions taken, in compliance with the principles of confidentiality and business secrecy or, if the Report has not been followed up, the reasons why this has occurred;
- in the event of a request from the local Supervisory Body, it will share with the latter the information, documents and actions taken relating to the Reports

received, always safeguarding confidentiality.

It should be noted that the management of the Report consists of the following phases:

- **Triage:** verification that the subject and content of the Report comply with this Policy;
- **Evaluation:** in the event of a positive outcome of the Triage, evaluation of the probability of validity of the Report and the potential impact of the Breaches reported with it. In this phase, the Speak Up Manager identifies the company and/or Bolton functions to be involved;
- **Investigation:** at the end of the Evaluation, all necessary checks are conducted, together with the corporate and/or Bolton functions involved, including inspections, interviews, analyses, including accounting and legal analyses, necessary to confirm the validity or otherwise of the Breaches and their actual extent, as well as to ascertain individual responsibilities. The investigation phase may involve the involvement of external consultants with appropriate expertise.
- **Closing:** conclusion of the process and definition and implementation of the initiatives to be undertaken.

External Reports

With regard to Bolton's subsidiaries to which Directive (EU) 1927/2019 applies, it should be noted that, for Whistleblowing Breaches only, the Reporting person may also make a Report through the channel set up at the competent national authority or body, in accordance with the procedures defined by the latter, if, at the time of the External Report, one of the following conditions is met:

- the Reporting person has already made an Internal Report and the same has not been followed up or has ended with a negative final measure;
- the Reporting person has reasonable grounds to believe that, if they made an Internal Report, it would not be followed up effectively, or that the Internal Report itself could determine the risk of retaliation;
- the Reporting person has reasonable grounds to believe that the Breach may constitute an imminent or obvious danger to the public interest.



PART III – FINAL DISPOSITIONS

1. Privacy

The Reports and the Reporting person's data will be collected and processed only by the Speak Up Manager, duly authorized to process personal data on the basis of the applicable laws.

Furthermore, the Reports and the data of the Reporting person, the Persons concerned and the Facilitators may only be communicated to the parties involved in the management of the Report as indicated in Paragraph 2 of Part II above, as well as to the external consultants and professionals used by the Speak Up Manager and/or the Bolton subsidiary to which the Report refers, in compliance with the provisions of the law on the protection of personal data in force.

In any case, before sending the Report, the Reporting person will receive an appropriate privacy notice regarding the processing of their personal data. In particular, this notice (the template of which is attached as **Annex 1** to this Policy) will be automatically generated by the Platform or read by the automated responder of the Toll-Free Number: failure to review it in advance (in the case of the Platform) or confirm that it has been heard and understood (in the case of the Toll-Free Number) will prevent the submission of the Report.

For certain types or purposes of processing, the Reporting person may also be asked to give his/her consent.

2. Liability of the Reporter

This Policy does not prejudice the civil, criminal, and – where applicable, in the case of an employee – disciplinary responsibility of the Reporting person in the event of a false, slanderous or defamatory Report.

Any forms of abuse, such as manifestly opportunistic Reports and/or made for the sole purpose of harming others, and any other hypothesis of improper use or intentional instrumentalization of the right to make the Report, are also a source of liability.

Furthermore, no protection will be granted if the Reporting person's criminal responsibility for defamation or slander is established, even with a first-instance judgment, or if their civil liability is determined due to fraud or gross negligence. The



Reporting person's behavior will also be considered in disciplinary terms in accordance with the provisions of the applicable National Collective Labor Agreement (CCNL) and the company's internal regulations.

3. Consequences of the Report for the Person concerned

If it deems the Report to be well-founded, without prejudice to any other remedy and legal faculties, disciplinary proceedings may be initiated against the Person concerned in accordance with the applicable legal, contractual and corporate regulations.

In addition, the Breaches may be brought to the attention of the competent authorities through complaints, lawsuits, legal actions and so on.

4. Entry into force and publication

This Policy comes into force on 5th January 2025.

In order to ensure that the internal Reporting channel is known, the procedures and the prerequisites for making Reports, this Policy is published, in electronic format, on the company intranet and on the Bolton website in the following languages: English, Italian, French, German, Spanish and Dutch.

5. Contacts

Any questions or requests for information relating to this Policy can be addressed to the following e-mail address: srolandi@boltongroup.it.



PRINT ONLY IF NECESSARY



Bolton Group S.r.l.

Via G.B. Pirelli, 19 – 20124 Milan – Italy

www.bolton.com