

# BOLTON SPEAK UP POLICY



SCAN TO ACCESS  
THE SPEAK UP PLATFORM



# CONTENTS

<b>FOREWORDS</b>	<b>2</b>
<b>PART I – GENERAL</b>	<b>3</b>
1. Background and objective	3
2. Scope	3
3. Definitions	3
4. Reference documents	5
5. Principles	6
<b>PART II – SPEAK UP PROCESS</b>	<b>8</b>
6. Roles & Responsibilities	8
Bolton Level	8
Business Unit Level	10
Case of Conflict: Reallocation & Escalation	12
7. [WHY] Reports	13
8. [WHO] Reporter	14
9. [HOW] Reporting Channels	14
Speak Up	14
Local Operational Onsite Complain Mechanism	15
10. [WHAT] Case Management Process	15
a. Receiving	15
b. Triage	15
c. Assessment	16
d. Investigation	16
e. Closing	17
f. Wrongdoing Allocation & Case Management Levels – Visualisation	18
11. Countermeasures	18
<b>PART III – FINAL DISPOSITIONS</b>	<b>19</b>
12. Rights of Report Subjects	19
13. Document storage and traceability	19
14. Communication and training	19
15. Process monitoring and improvements	19
16. Privacy	20
17. Access and contacts	20
18. Partnership with Oxfam	20



# FOREWORDS

Bolton is an Italian, family-owned company that has produced and distributed a wide range of innovative, sustainable and high-quality branded consumer products for over 70 years.

Bolton is committed to conducting business with fairness, integrity and respect for the law and for its values respecting both the planet and the people, starting from its **Code of Conduct** and its **Human Rights Policy**. The Company also expects all its partners to act responsibly and with integrity.

Bolton values transparency and encourages a listening environment. The **Bolton Speak Up Policy** summarizes our commitment and 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 third-party partners of the Company that are damaging for those affected, Bolton, people and society.

As described in the policy, if someone observes, hears about, suspects or it is subject of any wrongdoing or unethical conduct at work, they are encouraged to approach their line manager/supervisor or HR/local operational onsite complaint mechanisms in the first instance to raise the concern. If they do not feel that appropriate action has been taken to address their concern and/or wish to raise their concern anonymously, they are encouraged to use the Bolton **Speak Up platform**.

By doing so, the Reporter also provides the Company with the opportunity to follow up and address wrongdoing or unethical behavior at work or in connection to Bolton which ensures the Company can address early and remediate directly any adverse Bolton related human rights impacts, as well as well as action(s) or omission(s) than can cause harm. This will thus allow Bolton both to provide a safe and inclusive work environment for all, and to avoid damaging the Company's reputation. Our Policy protects the anonymity of the Reporter, and Bolton does not tolerate any form of retaliation against anyone for speaking up, allowing Reporters to raise concerns in good faith about suspected wrongdoing or unethical behavior at work.

The Bolton Speak Up Policy aims to clarify when and how internal and external parties, as defined hereafter, can make a Speak Up Report and explains how it is handled within a reasonable time frame to take appropriate action.

## PART I – GENERAL

### 1. Background and objective

Bolton has established a single and comprehensive violation reporting mechanism in line with the highest standards of mature *Whistleblowing Management Systems* and international *Grievance Mechanisms*, to report and consistently manage possible Wrongdoings including Breaches, Human Rights Violations and Interpersonal Complaints.

The objective of this document is to describe the process of managing the Reports that includes receiving, analyzing, and handling them. The procedure defines the reportable issues, the parties allowed to make the report and the management process – including the organization, roles & responsibilities – that both the Reporter and the companies must follow.

### 2. Scope

This procedure applies to Bolton Group S.r.l. and its subsidiaries, hereinafter Bolton, including all Internal and External reporting parties (see below sect. 8) to whom the guarantees indicated herein are extended.

### 3. Definitions

Bolton	Bolton Group S.r.l. and its subsidiaries.
Business Unit (also BU)	Group of Bolton companies organized per product categories or services, like Food, Home Personal Care & Beauty, Adhesives, International, others.
Compliance Team	The team or role (where no team is available), as part of the Legal & Compliance Function, responsible for managing, at the respective Bolton or BU level, Wrongdoings classified as Breaches.
External Party	Who is in an external relationship with Bolton or its subsidiaries, like: <ul style="list-style-type: none"><li>• Business Partners, such as<ul style="list-style-type: none"><li>- Customers, suppliers, consultants, or any other service providers (e.g. agents, advisors, intermediaries, contractors, members of internal controlling bodies, etc.) in a <b>business relationship</b> with Bolton;</li></ul></li><li>• Connected parties, such as<ul style="list-style-type: none"><li>- Consultants or any other service providers (e.g. agents, advisors, intermediaries, contractors, etc.) acting on behalf of Bolton.</li><li>Civil Society Organisations, trade unions or</li></ul></li><li>• workers associations and other who can advocate for rights-holders and local communities that could be potentially affected by Bolton's business operations;</li></ul>



**PART I – GENERAL**

- Other External parties, such as
  - People yet to be hired who became aware of wrongdoings during the selection process;
  - Former Bolton Employees or Bolton Partners who became aware of wrongdoings while still in a relationship with Bolton;
  - Others.

Functions	Bolton internal organizational structures with expertise/responsibilities in a specific field/service, like Compliance, HR, Internal Audit, Legal, Finance, etc., at BU or BG level.
Human Resources (also HR) Function	The function responsible for managing, at the respective Bolton or BU level, the Wrongdoings classified as Interpersonal Complaints and Human Rights Violations.
Internal Party	Employees including contractors, of any level whatsoever including, but not limited to, directors, executives and managers.
Person Involved	The natural or legal person mentioned in the Whistleblowing Report or in the public disclosure as the person to whom the wrongdoing is linked or as the person otherwise involved;
Retaliation	Any conduct, act or omission, even if only attempted or threatened, committed as a result of the Whistleblowing Report that causes or is likely to cause to the Whistleblower, directly or indirectly, unjust damage;
Speak Up Manager	The relevant function or ad hoc role, respectively from the HR Function for Grievances and from the Compliance Function for the other cases, managing the reports at the level indicated at the time (Bolton, BU, Local or expert).
Tier	For each case, the relevant Speak Up Manager responsible for managing the Whistleblowing Report, depending on the nature of the case (Compliance or HR matter) and the organizational level (Bolton or BU).
Reporter	The person making the Report or external disclosure of the violations.
Report	Written or oral communication of the Wrongdoing.

## PART I – GENERAL

Wrongdoing (including Breaches, Human Rights Violations, Interpersonal Conflicts)

Conducts, acts or omissions resulting in:

- Breaches. Being violations of laws and/or regulations, national and/or international, such as, but not limited to administrative, accounting, civil or criminal offences;
- Offences within the scope of European Union according to Directive 1937/2019 and its local transpositions with specific reference to:
  - product safety and compliance;
  - protection of the environment;
  - food and feed safety, animal health and welfare;
  - consumer protection;
  - protection of privacy and personal data, and security of network and information systems;
    - Violations of EU competition and state aid rules;
    - Violations of the local Corporate Liability regulations and the relevant internal company compliance programs.
    - Violations of the Bolton Code of Conduct;
- **Human Rights Violations.** Being any adverse impact that Bolton may have caused or contributed to cause, to an individual or a community in violation of Human Rights;
- **Interpersonal Complaints.** Being interpersonal conflicts between the reporting person and another worker exclusively affecting the Reporter.

---

### 4. Reference documents

Legal framework and other relevant references that are the basis for this procedure and its processes:

- EU Directive no. 1937/2019 on the protection of persons who report breaches of Union law and its local transpositions;
- EU Regulation no. 679/2016 “General Data Protection Regulation - GDPR” and its local transpositions;
- International ISO 37002 “Whistleblowing management systems”;
- UN Guiding Principles on Business and Human Rights (UNGPs);
- Other local regulations regarding wrongdoing and whistleblowing acts (e.g. US FCPA, UKBA, others).
- Other local regulations regarding Organisational, Management and Control Model (e.g. Italian Legislative Decree 231/2001 “Administrative responsibility of entities”, others);

## PART I – GENERAL

### 5. Principles

The persons involved in the activities regulated by this Policy must operate in compliance with the regulatory, organizational and powers system and with the principles established below:

#### ***Confidentiality and anonymity***

The identity of the Whistleblower should not be disclosed, without the Whistleblower's consent, to personnel not involved in the handling of the report.

It may only be disclosed, for instance, if strictly necessary for the handling of the report and, in any case, limited to whom is responsible for the management of the Whistleblowing Report, as described in this Procedure. In this case, the Whistleblower must be promptly informed.

Confidentiality and anonymity are observed also by adopting a dedicated whistleblowing tool ensuring cryptography systems.

#### ***Transparency***

The activities regulated by this Procedure must be managed in a way that ensures transparency in the performance and prompt, full and truthful disclosure of their process to ensure effective control and monitoring.

#### ***Impartiality, independence and professionalism***

Whistleblowing Reports must be managed to ensure necessary independence conditions are maintained and meet required objectivity, competence and professionalism diligence.

To ensure this, Tiers from the BU and Bolton level will be part of the decision-making process in relevant Committees. The responsibility for the final decision remains on the Tier in charge of the issue.

## PART I – GENERAL

### ***Prohibition of retaliation protecting Whistleblowers and other interested parties involved***

The prohibition of retaliation exists if the Whistleblower has made the Whistleblowing Report based on well-founded reasons.

The principle applies to reports received via any channel, even if the process is not regulated via this procedure.

Based on the principle of the “prohibition of retaliation”, taking the following measures against the Whistleblower are not allowed:

- dismissal, suspension or equivalent measures;
- downgrading or non-promotion;
- change of duties, change of place of work, reduction of salary, change of working hours;
- suspension of training or any restriction on access to it;
- negative merit notes or references;
- the adoption of disciplinary measures or any other sanction, including a fine;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavorable treatment;
- failure to convert a fixed-term employment contract into a permanent contract, where the employee had a legitimate expectation of such conversion;
- the non-renewal or early termination of a fixed-term contract;
- damage, including to a person’s reputation, in particular on social media, or economic or financial loss, including loss of economic opportunities and loss of income;
- improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- the early termination or cancellation of a contract for the supply of goods or services (in case of the Whistleblower is an External Party);
- the cancellation of a license or permit;
- the request to undergo psychiatric or medical examinations.



## PART II – SPEAK UP PROCESS

### 6. Roles & Responsibilities

#### **Bolton Level**

##### *Functions*

#### **Bolton Compliance Speak Up Manager**

- Responsible for defining the design and ensuring the constant updating of the process and maintaining/correct functioning of the signaling channels;
- Supports the BU's Speak Up Managers as main contact point;
- Ensures the information and awareness of the reporting channel and how the process works;
- Ensures the coordination and involvement of all actors involved in the reporting process at Bolton level;
- Receives periodic reports from the relevant BU's Speak Up Managers containing the reports received/managed at BU level with the purpose of improving the system;
- Promptly forwards reports of interest to the local Supervisory Body (if any) based on the preliminary assessments carried out.
- Responsible for the decisions and the management of the Compliance cases escalated from the BU's;

#### **Bolton HR Speak Up Manager**

- Responsible for the management and the decisions over the Grievances cases;
- Receives periodic reports from the relevant BU's Speak Up Managers containing the reports received/managed at BU level with the purpose of improving the system.

#### **Bolton Compliance**

Via the Bolton Compliance Speak Up Manager:

- Function responsible for the management of the Speak Up system, processes and tools;
- Responsible for the management of the Wrongdoings that are not Grievances;
- Ensures the monitoring of regulatory updates and its transposition within the countries where the Bolton Companies are present;
- It ensures that the processing of personal data takes place in compliance with privacy legislation;

## **PART II – SPEAK UP PROCESS**

### **Bolton HR**

Via the Bolton HR Speak Up Manager:

- Responsible for the management of the Wrongdoings that are Grievances;
- Where necessary, supports the Bolton Compliance Speak Up Manager and is involved in the investigation phase of the report;
- Ensures that protection measures are implemented for the Whistleblower and the reported person;
- Assesses the impacts from a labor law point of view;
- Manages any sanctioning process on the basis of verification activities.

### **Bolton Internal Audit**

- It ensures, where necessary, the carrying out of verification activities on the reported facts, like:
  - specific investigations, analyses and assessments as to whether or not the facts reported are well founded;
  - formulation of any recommendations regarding the adoption of the necessary corrective actions on the areas and business processes affected by the report.

### **Bolton Legal**

- It contributes to the management and evaluation of reporting for aspects concerning legal/contractual issues.

### ***Bodies***

#### **Bolton Speak Up Committee**

The Bolton Speak Up Committee is made up of permanent and non-permanent seats.

Permanent seats. It is composed by the Bolton Compliance Speak Up Manager, as Chair, and the Bolton HR Speak Up Manager.

Non-permanent seats. On a need base, it is also composed by the Bolton Internal Audit, Bolton Legal and the heads of other functions/companies of the Bolton.

## PART II – SPEAK UP PROCESS

With reference to the functioning of the committee:

- It meets periodically to:
  - Managing Bolton Whistleblowing Reports; monthly if any;
  - Receive an overall and aggregate assessment of the reported events at BU level (with the aim to analyze and improve the process) and report to the Bolton Board; once per quarter;
- It meets on request:
  - When an issue is escalated according the Escalation rules (*cf. sec. 6. Roles & Responsibilities, Reallocation & Escalation Cases, Escalation*).

### **Business Unit Level**

#### ***Functions***

#### **BU Compliance Speak Up Manager**

- Supervises the management of the management process of reports pertaining to the BU
- Responsible for the decisions and the management of the Compliance cases for which he/she:
  - Receives the reports for and makes a first evaluation to address it correctly;
  - Maintains interlocations with the reporting person, requesting appropriate additions, if necessary;
  - Ensures all appropriate checks and investigations are carried out on the reported facts;
  - Ensures that appropriate protection measures are taken for both the Whistleblower and the person subject of a report;
  - Monitor the implementation status of any corrective actions;
- Promptly forwards reports of interest to the Supervisory Body on the basis of preliminary assessments carried out, where applicable;
- Ensures the coordination and involvement of all actors involved in the process of managing and processing;
- Activates the Bolton Speak Up Committee through the Bolton Compliance Speak Up Manager, if he/she has assessed that the report received has a high level of risk/complexity;
- Ensures information/reporting to interested stakeholders if deemed relevant following the assessments carried.



## **PART II – SPEAK UP PROCESS**

### **BU HR Speak Up Manager**

- Responsible for the decisions and the management of the Grievances cases for which he/she:
  - Receives the reports and makes a first evaluation of the same in order to address it correctly;
  - Maintains interlocutions with the reporting person, requesting appropriate additions, if necessary;
  - Ensures that all appropriate checks and investigations are carried out on the reported facts;
  - Ensures that appropriate protection measures are taken for both the Whistleblower and the person subject of a report;
  - Monitor the implementation status of any corrective actions;
- Where necessary, he/she supports the BU Compliance Speak Up Manager and is involved in the investigation phase of the report;
- Ensures that protection measures are implemented for the Whistleblower and the reported person;
- Assesses the impacts from a labor law point of view;
- Manages any sanctioning process on the basis of verification activities.

### **Local HR Speak Up Manager**

- Manages, on request and on behalf of the BU HR Speak Up Manager, the local (legal entity) Grievances reports; the BU HR Speak Up Manager remains responsible for the decisions and overall case management;
- Supports, on request of the Bolton or BU Speak Up Managers, the local activities required to manage the violation reports.

### **Line Manager**

- Where necessary, is involved in the investigation phase of the Whistleblowing Report;
- Defines the action plan about the areas and processes affected by the Whistleblowing Report.

## PART II – SPEAK UP PROCESS

### **Bodies**

#### **BU Speak Up Committee**

Permanent seats. It is composed by the BU Compliance Speak Up Manager (or similar function specifically appointed, also ad interim), as Chair, and the BU HR Speak Up Manager.

Non-permanent seats. On a need base, the heads of other functions/companies of the BU.

- It meets periodically/once a month to:

- Manage BU Whistleblowing Reports; once per month;
- Report an overall and aggregate assessment of the reported events to the BU Management Body; once per quarter;

- It meets on request to:

- Escalate high risks and complex reports to the Bolton Speak Up Committee (*cf. sec. 6. Roles & Responsibilities, Reallocation & Escalation Cases, Escalation*).

### **Case of Conflict: Reallocation & Escalation**

#### **Reallocation**

It occurs when a potential Wrongdoing has been allocated to the wrong BU or Bolton Speak Up Manager (e.g. a Grievance, under the responsibility of HR Function, allocated to the Compliance Function) and will be correctly re addressed to the relevant function.

#### **Escalation**

When certain conditions occur, the case will have to be escalated from the BU Speak Up Manager to the Bolton Speak Up Committee. These conditions are in Whistleblowing Report are related to:

#### **PEOPLE**

Concerns/one of the following people are involved:

- A statutory Director of one of the Bolton legal entities;
- A BU CEO and/or one of his/her first direct reports;
- A member of the Statutory or Controlling Bodies.

## PART II – SPEAK UP PROCESS

### SEVERE POTENTIAL IMPACT

May have a qualitative (5% of the BU Operating Profit) and quantitative impact at Bolton level because:

- It may affect the financial statement.
- There may be a risk of a severe reputational damage for the Bolton/BU.

### TYPE OF ACTIVITIES OR RISK

Activities or processes that:

- are directly (or mainly) managed at Bolton level;
- there may be a conflict of interest, even potential, with the BU Speak Up Manager and the Whistleblower and/or the person concerned;
- there is a concrete risk to the confidentiality of the Whistleblower;
- Due to the complexity of the issue, the activity is more in alignment with the Bolton Speak Up Committee;

## 7. [WHY] Reports

Bolton Internal Parties and External Parties that identify possible Wrongdoings are required to report them in case of, for example:

- violations of the Code of Conduct;
- violations of the Human Rights Policy's values: working hours, health and safety, overtime, discrimination, sexual harassment, unfair treatment, etc;
- fraudulent and corruption activities;
- violations of free competition;
- violations of laws, regulations or national and international measures;
- discriminatory behavior or cases of harassment at work;
- any situation in which a person's personal interest, even if only potential, may interfere with the interests of Bolton (conflict of interest).

## PART II – SPEAK UP PROCESS

Moreover, in compliance with the EU Directive no. 1937/2019 and the relevant local transpositions, the Reports may also concern violations of European laws and local regulations in the following areas:

- product safety and conformity;
- environmental protection;
- food safety;
- public health;
- consumer protection;
- personal data protection;
- infringements affecting the financial interests of the Union;
- violations of the internal market, of Union rules about competition and State aid, violations of corporate tax rules.

### 8. [WHO] Reporter

The Reports may be done by:

- Internal Parties (*cf. sec. 3, Definitions*);
- External Parties (*cf. sec. 3, Definitions*).

### 9. [HOW] Reporting Channels

Bolton has set up a new comprehensive violation reporting mechanism for Whistleblowing Reports, including *Grievances*, to enhance the existing channel:

#### **Speak Up**

For all Wrongdoings received

- via the Speak Up platform, using the [web intake](#) or calling the toll free phone number (see 17. Access and contacts);
- also verbally with the relevant BU Speak Up Manager;

## PART II – SPEAK UP PROCESS

### Local Operational Onsite Complain Mechanism (LOOM)

For Human Rights Violations and Interpersonal Complaints, based on local needs, the local Bolton company may implement Local Operational Onsite Mechanisms in addition and in line with the Speak Up, to ensure that:

- Workers and affected communities feel empowered to speak up;
- Workers and affected communities can easily access the tools set up by the company and enable an efficient mechanism in providing remedy by being located closest to where problems occur.

The LOOM will have to be:

- Identified and implemented in alignment with the Bolton HR function.
- Additional to the Speak Up that is the main Bolton Violation Reporting Mechanism channel.
- In line with the process, roles and responsibilities indicated in the Speak Up.

Reports received through local operational onsite mechanism should be reported every three/six months to BU HR Speak Up Manager, unless immediate communication is necessary, and must be under the Speak Up Policy principles and values described along this Policy.

## 10. [WHAT] Case Management Process

The internal Whistleblowing Reports received via the Speak Up channel must be managed following the activities described below:

### a. Receiving

When receiving a Whistleblowing Report, the BU Speak Up Manager must inform the Whistleblower that the report has been received within 7 days of receipt.

### b. Triage

This phase verifies that the subject and the content of the Whistleblowing Report are aligned with this procedure, allocated to the right Speak Up Manager and, if need, Reallocated to the appropriate Manager (*cf. sec. 6. Roles & Responsibilities, Reallocation & Escalation Cases, Reallocation*).

The BU Speak Up Manager is responsible for ensuring all appropriate checks are carried out on the facts outlined in the Whistleblowing Report received, guaranteeing they are carried out as quickly as possible in accordance with the completeness and accuracy of the triage.



## PART II – SPEAK UP PROCESS

If the results from the triage step are confirmed as valid, the process continues with the further phases indicated below.

If not, the BU Speak Up Manager informs the Whistleblower.

### c. Assessment

The assessment step of the Speak Up system sorts and prioritises received Whistleblowing Reports based on the likelihood and potential impact of the risk. The assessment conducts targeted inspections that make it possible to identify, analyse, and evaluate elements that might confirm whether the reported events are well-founded.

The BU Speak Up Manager ensures the performance of the necessary inspections: either directly, at the concerned BU, or through specific personnel including independent external consultants in possession of adequate seniority level, to obtain the necessary information to perform evaluations. In this phase, the BU Speak Up Manager assesses whether to initiate a “spot” audit. The activities are undertaken within the BU Speak Up Committee, ensuring the highest level of effective monitoring and internal controls.

The Assessment step may identify the need for involvement of the following functions:

- Bolton Speak Up Committee: If the BU Speak Up Manager escalates (*cf. sec. 6. Roles & Responsibilities, Reallocation & Escalation Cases, Escalation*) the report received, he/she involves the “Bolton Speak Up Committee”;
- Bolton Internal Audit: if it is necessary and requested, the Bolton Internal Audit performs activities on the Whistleblowing Report(s) to verify the legitimacy or unfoundedness of the Whistleblowing Report(s);

The BU Speak Up Manager must give feedback to the Whistleblower within 3 months of the receipt of the report.

At the end of the assessment, in case all relevant elements that might confirm whether the reported events are well-funded have been gathered, the BU Speak Up Manager may proceed to conclude the Whistleblowing Report. In case the relevant elements are not sufficient or sufficiently clear to confirm the reported events are well-funded, the BU Speak Up Manager may proceed with the further investigation phase.

### d. Investigation

The investigation phase must be impartial to the Functions concerned, the Whistleblower and the subject of the report and must be conducted without bias. The subject of the wrongdoing should be given the right to respond as required and the option to be assisted.

## PART II – SPEAK UP PROCESS

This phase must be performed including but not limited to the following principles:

- investigations should be adequately resourced;
- clear terms of reference and scope should be defined and documented;
- the investigation should secure and protect evidence;
- personal data should be managed in line with data protection (*paragraph "5. Principles"*);
- communication should be clear and unambiguous;
- the Whistleblower must be periodically informed about the progress steps.

Moreover, the HR Function at the relevant level must be involved in the investigation phase to ensure that protection measures for the Whistleblower and the reported person are implemented and to assess the impacts from a labor law point of view.

### **e. Closing**

The closing phase designates the end of the process.

A case must be closed if no more actions are considered necessary including further investigations.

During that phase, the following steps must be considered:

- concluding an investigation, including issuing findings;
- acting in response to any recommendations (e.g., disciplinary actions);
- communication to personnel responsible for supporting and protecting the Whistleblower and other relevant interested parties;
- identifying any ongoing protection measures;
- collecting feedback from the Whistleblower and other relevant interested parties;
- archiving the documents processed during the previous phases.

If the assessment phase confirms the Wrongdoing, the relevant local manager may be involved to define the action plan about the areas and processes affected by the Whistleblowing Report.

Moreover, the BU Speak Up Manager with the support of the Local Speak Up Manager will:

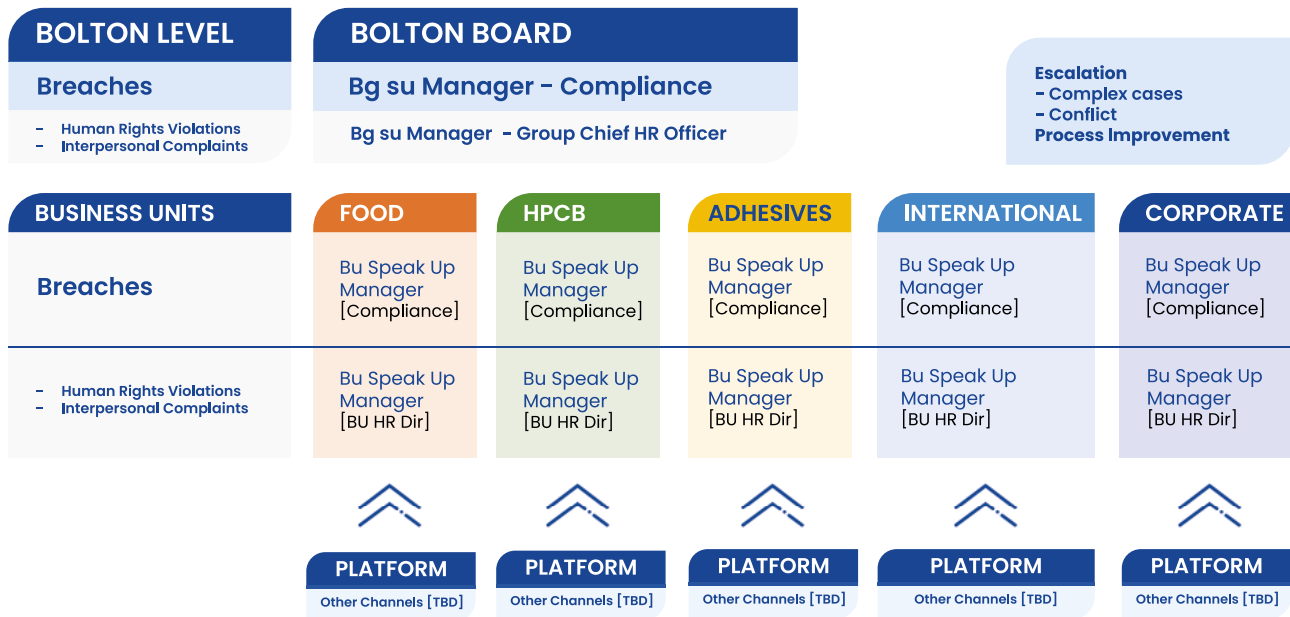
- define the measures to resolve the wrongdoing;
- continuously monitor the effectiveness of those measures;

## PART II – SPEAK UP PROCESS

- define disciplinary measures, if applicable;
- involve the relevant authorities, if necessary.

The actions taken and any findings must be promptly communicated to the Whistleblower including all necessary details.

### f. Wrongdoing Allocation & Case Management Levels – Visualisation



## II. Countermeasures

Remedial measures are actions that are taken to correct something which has gone wrong, and to minimize the possibility of this wrong (or similar events) occurring again in the future.

Disciplinary action will be carried out by the local entity, under the supervision of the relevant Speak Up HR Manager, and in consultation with the local HR.

## PART III – FINAL DISPOSITIONS

### 12. Rights of Report Subjects

The relevant Speak Up Manager responsible for the Whistleblowing Report will inform the subject of the report that a report was made about his/her conduct at the appropriate time. This may be directly or via the Line Manager or HR Function. If measures are needed to preserve evidence, such persons will only be informed after these measures have been taken.

### 13. Document storage and traceability

The Reports must be tracked in compliance with privacy requirements.

In case of Reports made by phone or by voice, the report must be tracked by:

- recording the conversation, with previous authorization of the Reporter;
- writing minutes of the meeting signed by the Reporter for approval.

All the documents relating to the Report must be stored for as long as necessary to close the report. Unless otherwise indicated by local law or, if stricter, internal agreements, the requirement to retain the Report documentation expires after 5 years of notice to the Reporter of the final result of the Wrongdoing process.

### 14. Communication and training

Bolton should provide appropriate measures:

- to make the Internal Parties and External Parties aware about the Speak Up system, including its policy, the process to follow and the compliance requirements;
- to train with documented evidences the Speak Up Managers and the personnel supporting the process.

### 15. Process monitoring and improvements

**Area improvements.** Based on the type of Whistleblowing Reports, the Bolton Speak Up Committee will monitor and evaluate process improvements in the areas where the violations occurred at Bolton and/or BU level. The measures will be developed and undertaken with the support of the relevant BU's and Functions.

**System improvements.** The system will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with evolving local legal requirements. Based on such specific local legal requirements the BU's, in alignment with the Bolton Compliance Speak Up Manager, may implement stricter BU local rules when this aims to ensure a higher level of protection for the reporter in compliance with the law.

## PART III – FINAL DISPOSITIONS

### 16. Privacy

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 Reporter – if the 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 Report.

All Personal Data not useful for the Report management, must not be collected. Moreover, in case of accidental collection, these data must be immediately deleted.

The data controller will be each company of Bolton to which the Reporter and/or the Person Involved belongs, as well as the parent company, which will act as autonomous data controller in each case.

If there is a risk that the exercise of the rights granted according to Chapter III of the GDPR could result in actual and concrete prejudice to the confidentiality of the identity of the Reporter, and that the ability to effectively verify the merits of the Report or to gather the necessary evidence could be compromised, the right is reserved to limit or delay the exercise of said rights, in accordance with the applicable legal provisions. Under no circumstances may the Person Involved or any third party, exercise their rights of access to obtain information on the identity of the Reporter.

Bolton reserves the right to assess, on a case-by-case basis, the specific circumstances and conditions that would make it advisable to specifically inform the Person Involved about the conclusion of the verification procedure initiated, to avoid abuses and in any case guarantee his or her protection of rights as data subject.

### 17. Access and contacts

Any questions or requests for information regarding the Bolton Speak Up may be addressed to the Bolton Compliance Speak Up Manager via the web intake or via the following email address:

[compliance@boltongroup.it](mailto:compliance@boltongroup.it)

Reports over Wrongdoings, must be directed via the Bolton Speak Up web intake and toll free phone line.

## PART III – FINAL DISPOSITIONS

Web Intake: <https://boltonspeakup.ethicspoint.com> or scan the QR with your mobile device.



### TOLL FREE PHONE LINE

COUNTRY	TELEPHONE NUMBER
United States	844-539-2201
Austria	0800-002-143
Belgium	0800-13-099
Canada	844-539-2201
Colombia	01-800-519-0367
Croatia	385-800-98-04
Czech Republic	800-444-405
Ecuador	1800-001-149
France	0-800-90-46-87
Germany	0800-181-5306
Greece	800-600-0648
Italy (includes San Marino, Vatican City)	800-978-807
Morocco	WEB ONLY (No telephony)
Netherlands	0800-0227-792
Poland	800-005-291
Portugal	800-815-055
Romania	0800-890-567
Serbia	0800-800-697
Slovak Republic	0800-601-177
Slovenia	080-688-619
Spain	900-751-107
Switzerland	0800-123-066
United Arab Emirates	800-012-0107

### 18. Partnership with Oxfam



This policy was drafted by Bolton taking into account Oxfam's suggestions based on its vision and principles on the protection of human rights



THINK BEFORE YOU PRINT



**BOLTON**

Bolton Group S.r.l.  
Via G.B. Pirelli, 19 - 20124 Milan - Italy  
[www.boltongroup.net](http://www.boltongroup.net)