

BOLTON SPEAK UP POLICY



SCAN TO ACCESS
THE SPEAK UP PLATFORM





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FOREWORDS

The 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 75 years.

The Group 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, either internally or by third-party partners of the Company.

As described in the Policy, if someone observes, hears about, or suspects any wrongdoing or unethical conduct at work, they are encouraged to approach their line manager / supervisor or HR 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 provides the Company with the opportunity to follow up and address wrongdoing or unethical behavior at work which may damage the Company's reputation, success and performance both now and in the future. It also ensures that the Company can continue to provide a safe and inclusive work environment for all.

Our Policy protects the anonymity of the Reporter, and the Company does not tolerate any form of retaliation against anyone for speaking up. This allows reporters to raise concerns in good faith about suspected wrongdoing or ethical behavior at work.

The Bolton's 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 system to report and consistently manage possible Wrongdoings (*Whistleblowing Management System*), including Grievances (*Grievance Mechanism*).

The objective of this document is to describe the process of managing the Whistleblowing Reports that includes receiving, analyzing, and handling the report. 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 Whistleblower 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 companies of the Bolton organized per product family or services, like Bolton Food, Home Personal Care & Beauty, Bolton Adhesives, Bolton International, others.
Compliance Function	The function or role (where no function is available) responsible for managing, at the respective BG or BU level, the Wrong doings that are not Grievances.
External Party	Who is in an external relationship with Bolton or its subsidiaries, like: <ul style="list-style-type: none">• Bolton Partners, such as<ul style="list-style-type: none">- Customers, suppliers, consultants, agents, other business partners;• Other External parties, such as<ul style="list-style-type: none">- 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.



PART I – GENERAL

Grievance	Interpersonal wrongdoing exclusively affecting the reporting person, namely grievances about interpersonal conflicts between the reporting person and another worker.
HR Function	The function responsible for managing, at the respective BG or BU level, the Wrongdoings that are Grievances.
Internal Party	Who is in an internal business relationship with Bolton or its subsidiaries, like: <ul style="list-style-type: none">- all employees of Bolton Companies, at all contract level (including agency workers, interns, others);- personnel with positions of representation, administration or management, or who exercise management and control over company activities;
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 (BG, 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 (BG of BU).
Whistleblower (also Reporter)	The person making the Whistleblowing Report or external disclosure of the violations acquired in the context of his or her work context.
Whistleblowing Report	Written or oral communication of the Wrongdoing;



PART I – GENERAL

Wrongdoing

Conduct, acts or omissions – including Grievances

- detrimental to the company and consisting of:
 - violations of the Code of Conduct;
 - violation of the Human Rights Policy;
 - administrative, accounting, civil or criminal offences;
 - offences within the scope of European Union or national acts;
 - acts or omissions affecting the financial interests of the Union;
 - violations of EU competition and state aid rules;
 - Violations of the local Corporate Liability regulations like, for instance in Italy, the Legislative Decree no. 231/2001 and the company compliance model.

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 BG 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 Group 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 BG 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 (*cfr. sec. 6. Roles & Responsibilities, Reallocation & Escalation Cases, Escalation*).

Bolton 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 interlocutions 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 BG 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:
 - 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 BG 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's 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 OP) 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 Group Speak Up Committee;

7. [WHY] Whistleblowing 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;
- 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 Whistleblowing 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 Whistleblowing 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:

Traditional [EXISTING]

For Grievances **received** by the Local HR Department that remains responsible for the case management according to the local procedures, if any.

The reports received via this channel are outside the scope of this procedure, nonetheless the principles of impartiality and non-retaliation still apply.



PART II – SPEAK UP PROCESS

Speak Up [NEW]

For all Wrongdoings, including Grievances, **received**

- via the Speak Up platform, using [the website](#), or calling the toll [free phone number](#).
- also verbally with the relevant BU Speak Up Manager.

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.

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.



PART II – SPEAK UP PROCESS

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 involve the “Bolton Speak Up Committee”;
- Group 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.

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 “7. 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.



PART II – SPEAK UP PROCESS

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;
- 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.

11. 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 Whistleblowing 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 Whistleblowing Reports must be tracked in compliance with privacy requirements.

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

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

All the documents relating to the whistleblowing 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 Whistleblowing documentation expires after 5 years of notice to the Whistleblower of the final result of the whistleblowing process.

14. Communication and training

The Company 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 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 BG Speak Up Committee will monitor and evaluate process improvements in the areas where the violations occurred at BG 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 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 Personal Data not useful for the Whistleblowing 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 Whistleblower 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 Whistleblower, and that the ability to effectively verify the merits of the Whistleblowing 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 Whistleblower.

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. Contacts & Links

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

compliance@boltongroup.it

Questions over possible Wrongdoings, including Grievances and ethical concerns, may also be directed via the Bolton Speak Up web intake and toll free phone line.



PART III – FINAL DISPOSITIONS

Web Intake: <https://boltonspakeup.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



THINK BEFORE YOU PRINT



BOLTON

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