

QUALITY, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM	C-AG-LEG-P.01 PROCEDURE	AFTER GLASS S.P.A.
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PROCEDURE FOR REPORTING UNLAWFUL CONDUCT

Ed.	Date	Amendments	Issued and verified by:	Approved by:	Signed for approval:
1	27/11/2023	First issue	The Legal Department C. Reggiani	The Legal Department C. Reggiani	
2	04.07.2024	First revision	The Legal Department C. Reggiani	The Legal Department C. Reggiani	

1. PURPOSE

This procedure has been drafted in accordance with the specific conditions and requirements laid down in Italian Legislative Decree no. 24/2023 and its purpose is to set up a reporting channel that will enable employees, collaborators, consultants, self-employed workers, and anyone else operating within the work environment, to report breaches of national or European regulatory provisions that are harmful to the public interest or the integrity of After Glass S.p.A. ("After Glass" or "Company"), as violations of the Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001, or violations of the Code of Ethics adopted by the Bormioli Luigi Group (also "Bormioli Group").

After Glass is entirely owned by Bormioli Luigi S.p.A. ("Bormioli Luigi") and is therefore one of the companies that make up the Group and has set up a reporting channel pursuant to Italian Legislative Decree no. 24/2023, on behalf of all the other companies in the Bormioli Group.

The Group reporting channel is managed by After Glass's Supervisory Body (After Glass's OdV), which is composed of individuals who are appropriately trained on the rules governing the reporting channel and on the confidentiality obligations to be complied with when handling whistleblowing reports. Additionally, the members of After Glass's Supervisory Body have the independence and autonomy requirements needed to be able to perform the task entrusted to them.

This being the case, After Glass has decided to fulfil its obligation to set up a reporting channel pursuant to Italian Legislative Decree no. 24/2023, making use of the Group reporting channel and entrusting Bormioli Luigi with the task of managing the Group reporting channel also in its own name and on its own behalf, in accordance with the provisions of this procedure.

This procedure defines and regulates the activities required for the proper management of the reporting channel by Bormioli Luigi as the entity assigned with the management of said reporting channel, and the measures put in place to protect the reporting person ("Whistleblower") and all the other persons involved in the reporting process.

In particular, this whistleblowing procedure specifies:

- (i) who can do the reporting;
- (ii) the violations that can be disclosed through the reporting channel;
- (iii) the terms and conditions for collecting and processing reports;
- (iv) the conditions under which a reporting person can benefit from the status and protection measures provided for Whistleblowers pursuant to Legislative Decree no. 24/2023;

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(v) the measures implemented to protect the Whistleblower and anyone else who, for various reasons, could be impacted by the procedure.

2. SUBJECTIVE FIELD OF APPLICATION

This procedure applies to all those who may have become aware of violations and breaches within the scope of their work context. Those who can do the reporting within the context of this procedure include:

- employees, including occasional workers;
- workers with temporary job contracts;
- workers hired by contractors in intra-company contracts;
- holders of coordinated and continuous collaboration contracts;
- self-employed or freelance workers and consultants;
- volunteers and trainees, paid and unpaid;
- former employees and collaborators;
- job applicants and candidates in selective recruitment procedures;
- shareholders;
- members of the Board of Directors;
- members of the Board of Statutory Auditors.

The above list is not exhaustive.

The protective measures provided to the Whistleblower in this procedure are also extended to the following categories of person:

- physical persons who assist the Whistleblower (so-called "Facilitators");
- people belonging to the same work environment as the Whistleblower, connected by a stable emotional or family relationship up to the fourth degree;
- Whistleblower's work colleagues, bound by a habitual, currently existing relationship;
- enterprises owned by the Whistleblower (either exclusively or in which they hold a majority share), enterprises for which the Whistleblower works and enterprises operating in the same work environment.

3. CONTACT PERSONS APPOINTED TO MANAGE THE REPORTING CHANNEL

After Glass is the authorised entity to manage the reporting channel. In particular, reports are received and processed by the After Glass ODV which is composed by the company **Professional Governance Overview S.r.l.** ("Contact Person" or "Contact Persons"):

- E-mail whistleblowing@3pgo.com ;
- E-mail odv.afterglass@bormioliluigi.com ;

If the report involves one of the Contact Persons of the aforementioned Company, it must be made exclusively by filling in the report form attached to this procedure (Annex 1), to be sent by e-mail to

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Veronica Brandini

e-mail: veronica.brandini@bormiolilugi.com

The Contact Persons appointed to manage the reporting channel provide clear and transparent information on the reporting channel, the terms of the procedure and how it works, and the conditions for making reports.

The Contact Persons are appropriately trained on how the reporting channel works and on the protective measures provided for by Legislative Decree no. 24/2023 for the Whistleblower, the Facilitators and any other persons involved in the reporting process. The Contact Persons have good data processing skills and are independent and autonomous. The Contact Persons handle the reporting channel impartially.

4. OBJECT OF THE REPORT

The violations covered by the reporting channel concern conduct, actions and omissions harmful to the public interest or the integrity of the Company, of which the Whistleblower has become aware in the context of their work.

In detail, violations are behaviours, acts or omissions, which consist in:

- 1) unlawful conduct that is relevant pursuant to Decree 231, or failure to comply with Model 231, the policies, the procedures adopted by the Company;
- 2) offences falling within the scope of European Union acts, in breach of national and European provisions, relating to the following areas: public procurement; services, financial products and markets and the prevention of money laundering and terrorist financing; product safety and conformity; transport safety; environmental protection; nuclear radiation protection and safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and protection of personal data and security of information systems and networks; acts or behaviour which undermine the interests protected by the European Union in these areas are also covered;
- 3) acts or omissions affecting or otherwise affecting the financial interests of the European Union;
- 4) acts or omissions relating to the internal market of the European Union, including infringements of European Union competition and State aid rules, as well as infringements concerning the internal market of the European Union, relating to acts which infringe the rules on corporation tax or the mechanisms for obtaining a tax advantage which nullifies the object or purpose of the applicable legislation on corporation tax (and therefore the use of circumventational mechanisms).

This procedure also applies in the event of discrimination, mistreatment, coercion, intimidation, harassment or any other offence in violation of the Code of Ethics.

This procedure does not apply to reports on information covered by national defence secrecy, medical secrecy, judicial secrecy or lawyer's professional secrecy.

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This procedure does not, however, apply to personal complaints of the Whistleblower, relating exclusively to their own employment relationship. By way of non-limiting example, this category includes reports on situations of a personal nature concerning claims or grievances relating to relations with hierarchical superiors or colleagues, or to performance at work.

5. WHISTLEBLOWER PROTECTION MEASURES

5.1. PROHIBITION AGAINST RETALIATION

The Whistleblower is protected against any form of discrimination, penalisation or retaliation, direct or indirect, for reasons linked to the report.

It is important to note that the following measures, when taken as a consequence of the report, could constitute a breach of the prohibition of retaliation: disciplinary measures, dismissal or equivalent measures, suspension from work, demotion or lack of promotion, transfer, reduction in remuneration and modification of working hours, detrimental treatment in regulatory or economic terms, suspension or limitation of access to training, failure to convert a fixed-term contract or early termination of a contract.

If the Whistleblower feels that they have been subjected to discrimination, retaliation or threats as a result of a report, they shall inform the Contact Persons, who will verify the existence of such discrimination, retaliation or threat, and inform the Company thereof so that appropriate measures can be taken.

The same protection measures provided for the Whistleblower with regard to the prohibition of retaliation also apply to anyone who has made an anonymous report, but whose identity is subsequently revealed.

5.2. CONFIDENTIALITY

Any data and information relating to the identity of the Whistleblower and the subject of the report are protected by a confidentiality obligation and may not be disclosed. The confidentiality obligation and disclosure prohibition also extend to the person being reported and to any other person mentioned in the report.

Compliance by the Whistleblower with the methods for sending the reports provided for by the reporting channel described in this procedure enables said Whistleblower to preserve the confidentiality of their identity and that of their report.

With the exception of the Contact Persons, no other individual belonging in any capacity whatsoever to the organisation of Bormioli Luigi or to the organisation of other companies of the Bormioli Group shall or may have access to information concerning reports connected with the work environment of After Glass.

The individual Contact Person is authorised to communicate and share the information that is the subject of the report exclusively with the other Contact Persons for the purposes of the assessment and management of the report, including the preliminary investigation phase aimed at verifying whether the report is well-founded and, if so, the adoption of consequent measures and/or actions.

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Each Contact Person appointed to manage the reporting channel undertakes, in advance, to sign a specific confidentiality clause and is informed of the sanctions to which they would be exposed if they were to violate this commitment.

Elements identifying the Whistleblower as the reporting person may only be disclosed with the express consent of the same, except where the Contact Person is required to disclose said elements to a judicial authority. In this case, the Whistleblower is notified of this disclosure to the judicial authority, unless such information would jeopardise the judicial proceedings.

Breach of confidentiality obligations is punishable by an administrative fine of between €10,000 and €50,000. All other possible liability profiles, including criminal liability, against the person who has breached the confidentiality obligations remain unaffected.

The same protection measures provided for the Whistleblower with regard to the confidentiality obligations also apply to anyone who has made an anonymous report, but whose identity is subsequently revealed.

6. METHODS AND HANDLING OF THE REPORTS

6.1. FORM AND CONTENTS OF THE REPORT

The report must be clear and substantiated so that the facts reported therein can be carefully evaluated and understood by the Contact Persons. To this end, the report must:

- (i) specify the time and place in which the violation being reported took place;
- (ii) provide a clear and substantiated account of the facts leading to the violation;
- (iii) precisely list the details and any other elements useful for identifying the party or parties responsible for the violation.

The Whistleblower is asked, wherever possible, to produce any documents that can back up the report, so that the Contact Persons can judge whether the facts regarding the violation are well-founded. The Whistleblower is also asked to indicate any other person with knowledge of the facts presented in the report.

It is important to note that the report may concern violations that have come to the Whistleblower's knowledge either directly or indirectly through other people (e.g. through a work colleague), provided that it is backed up by concrete elements.

On the other hand, news that is manifestly unfounded, information that is already fully in the public domain or acquired only on the basis of indiscretions or unreliable hearsay (so-called "rumours") cannot be the subject of a report.

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Anonymous reports are admissible. But the Company does not encourage Whistleblowers to make anonymous reports, as the initial investigation stages are likely to be more difficult.

Any reports made anonymously are subject to special precautions and are only processed if the information contained in them is sufficiently detailed and concerns matters that are sufficiently serious in connection with the possible commission of a violation pursuant to Legislative Decree no. 24/2023. If this is not the case, the Contact Person may consider the report inadmissible.

In all cases where the Whistleblower has reasonable grounds to believe that the internal report will not be followed up or may lead to retaliation against them, said Whistleblower may make an external report to the National Anti-Corruption Authority (ANAC).

The report to the ANAC may only concern violations of the acts, provisions of the European Union (EU).

An external report to ANAC may also be made in the following additional cases:

- (i) the reporting channel is not working or is not in compliance with the regulations in force;
- (ii) the Whistleblower has already submitted an internal report and it has not been followed up;
- (iii) the Whistleblower has good reason to believe that the violation reported could present imminent or manifest danger to the public interest (e.g. in the event of there being a threat to personal health or the environment).

In addition, Whistleblowers can directly carry out a public disclosure, which may only affect violations of acts, provisions of the European Union (EU). when:

- the Whistleblower has previously carried out an internal and external alert or has directly issued an external alert and has not been acknowledged within the time limits set for the measures planned or taken to follow up alerts;
- the Whistleblower has reasonable grounds to believe that the infringement may constitute an imminent or manifest danger to the public interest;
- the Whistleblower has reasonable grounds to believe that the external alert may involve the risk of retaliation or may not have effective follow-up due to the specific circumstances of the particular case, such as where evidence may be concealed or destroyed or where there is a reasonable fear that the person who received the report may be colluding with the offender or involved in the infringement itself.

In the event of reports made for the purpose of defamation or slander or in the event of improper use of the reporting channel, or should an assessment of the facts reported reveal a situation of co-responsibility on the part of the Whistleblower, disciplinary proceedings and/or legal proceedings before the competent authorities shall be initiated against the Whistleblower.

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If the report has been made in bad faith, and criminal or civil liability for defamation or slander emerges from it, also ascertained by a judgement of the first instance, the Whistleblower will lose their status as a Whistleblower pursuant to Legislative Decree no. 24/2023 and its respective protection measures. The Whistleblower will also be subject to an administrative fine of between €500 and €2,500.

6.2. REPORTING CHANNEL

After Glass has set up the Group reporting channel using the “My Whistleblowing” platform, supplied by Mygo S.r.l., available at the following link: <https://areariservata.mygovernance.it#!/WB/AfterGlass> ;

The “My Whistleblowing” platform has been set up in such a way as to guarantee separate access links to the platform for each company of the Bormioli Group. It is specified and emphasised that each link is exclusively dedicated to reports connected with the work environment of the individual companies of the Bormioli Group.

Alternatively, the report can be made by filling in the dedicated form annexed to this procedure (Annex 1), to be sent by e-mail to

veronica.brandini@bormiolilugi.com

, but only if the person reported is one of the Contact Persons referred to in this procedure.

It is also possible for the Whistleblower to report violations under this procedure verbally, by requesting a face-to-face meeting with the Contact Persons. Only the Whistleblower and the Contact Persons can attend the meeting “behind closed doors”, but it may be recorded (with the consent of the Whistleblower). If the Whistleblower does not consent to the recording, minutes will be taken, summarising the meeting and the Whistleblower’s statements. The Whistleblower will be asked to confirm or rectify the contents of their statements as recorded in the minutes, after which they will be asked to sign them for acceptance.

Rather than in person, the meeting may be held via the electronic platform chosen by the Company on each separate occasion (e.g. Microsoft Teams, Zoom, etc.) and recorded (with the consent of the Whistleblower). In the latter case, if the Whistleblower does not consent to the recording, the verbal report may be made only with a face-to-face meeting.

The Whistleblower may, of course, also request to make a verbal report in anonymous form, which shall be subject to the same confidentiality obligations applicable to written reports.

The following steps must be followed to make a report using the “My Whistleblowing” platform:

1. The Whistleblower must click on the link <https://areariservata.mygovernance.it#!/WB/AfterGlass> and fill in the dedicated form (see photo below) entering their name, surname and an e-mail address at which to receive the Unique Access Credentials:

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Compilare il form per ricevere le Credenziali Univoche di Accesso

Nome

Cognome

Email *

Si prega di non utilizzare l'indirizzo email aziendale

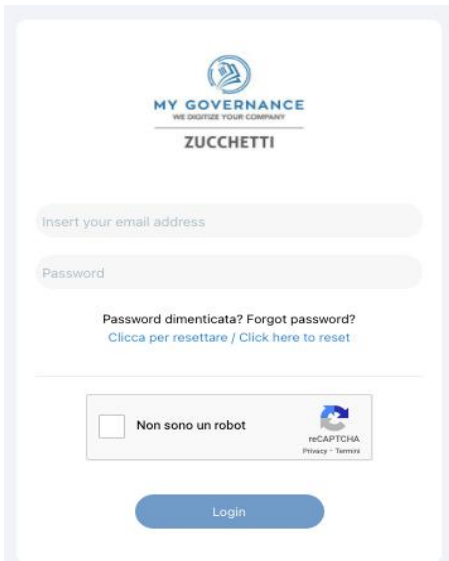
L'indirizzo e-mail è necessario al solo fine della registrazione. Il suo indirizzo e-mail non sarà visibile alla Società. Servirà unicamente per ricevere notifiche di eventuali nuove comunicazioni, da parte dei Gestori della Segnalazione.

Dichiaro di aver letto e accettato l'Informativa Privacy *

[Invia](#)

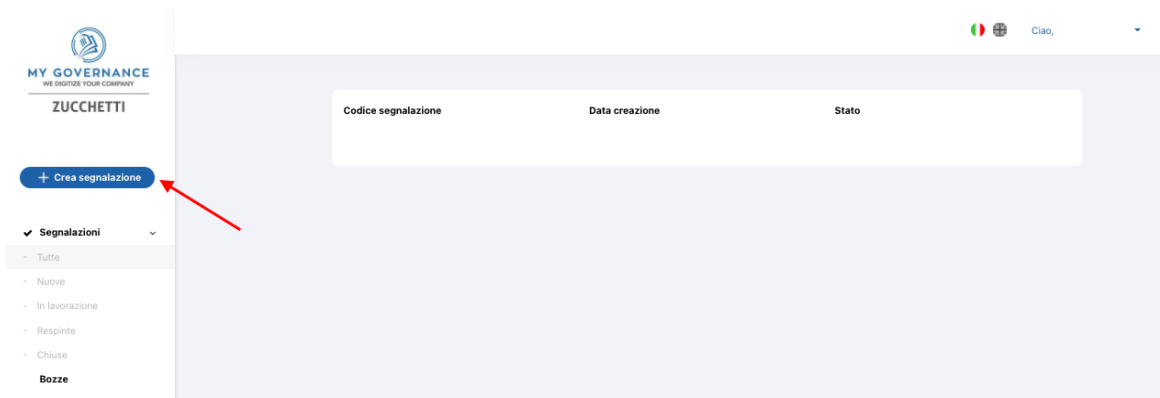
Sei già registrato? [Clicca per accedere](#)
 Password dimenticata? [Clicca per resettare](#)
 Per qualsiasi dubbio o necessità contattaci [cliccando qui](#)

2. the Whistleblower must follow the instructions sent to the e-mail address they provided in the form to receive the Unique Access Credentials;
3. The Whistleblower must then log into their own account (see photo below) using the Unique Access Credentials received:



4. The Whistleblower can proceed to enter the report by clicking on the "CREATE REPORT" button (see photo below):

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5. while entering the report, the Whistleblower can opt to submit it anonymously by ticking the relevant icon (see picture below):



6. once the report has been completed and sent, it enters the system after which it will be viewed and processed by the Contact Person using the same "My Whistleblowing" platform.

On the corporate website, there is a section containing a video tutorial that interactively illustrates the (above-described) method for making a report.

6.3. HANDLING OF REPORTS BY THE CONTACT PERSON

The processing of the report by the Contact Person is divided into the following 4 (four) phases:

1. Receipt of the report
The report is deemed to have been received when the Contact Person confirms receipt of the report to the Whistleblower by giving them a reference number. This number is used in all communications concerning the processing of the report. This acknowledgement is made in writing within 7 (seven) days of the Whistleblower sending the report.
2. Analysis of admissibility of the report

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The Contact Person verifies whether the facts reported fall within the scope of this procedure and also verifies whether the reporting person corresponds to the profile of a Whistleblower pursuant to Legislative Decree no. 24/2023.

The Contact Person may request further clarifications, documents, information and data from the Whistleblower, to back up the facts reported. To this end, the Contact Person may make use of the confidential anonymous internal chat on the "My Whistleblowing" platform.

This phase is concluded within eight (8) days of receipt of the report.

3. Preliminary investigation of the facts reported

The Contact Person carries out the necessary investigations to verify the facts reported.

This phase is concluded within three (3) months of confirmed admissibility of the report.

4. Conclusions and measures adopted

When the preliminary investigation has been concluded, the Contact Person will draw up their conclusions in a final report, backed up by their arguments. The outcome of the report is entered on the "My Whistleblowing" platform.

This phase is concluded within two (2) months of the preliminary investigation referred to above.

The Contact Person's final report may conclude with one of the following outcomes:

- Inadmissibility: the report is dismissed if the analysis of the admissibility of the report demonstrates that the facts reported are not in keeping with the aims, requirements or conditions set out in this procedure and provided for, more generally, by Legislative Decree no. 24/2023. In this case, the Whistleblower is not deemed to be in bad faith.
- Improper use of the system: if the analysis of the admissibility of the report or the preliminary investigation into the facts reported should reveal bad faith on the part of the Whistleblower, the report will be closed and disciplinary and/or legal proceedings initiated. In this case, the reporting person will lose their status as a Whistleblower pursuant to Legislative Decree no. 24/2023 and its respective protection measures.
- Groundlessness or insufficiency: the report is dismissed if the outcome of the preliminary investigation establishes that the violations are insignificant or if it emerges that, as a result of the generic nature of the account of the facts and/or the incompleteness or inappropriateness of the documentation accompanying the report, it is not possible to pin the responsibility for the facts reported on the alleged perpetrators. In this case, the Whistleblower is not deemed to be in bad faith.
- Importance of the facts: if the investigation carried out establishes the importance of the violations and the responsibility of their alleged perpetrators, the report may conclude with a proposal to initiate disciplinary proceedings, a report to the competent authorities, out-of-court action and/or legal proceedings against the alleged perpetrators of the violations.

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If, following the investigations carried out by the Contact Person, situations of serious violations emerge, the Contact Person will proceed without delay to communicate the outcome of the report and their own evaluations to the CEO of the Company and, at the first possible meeting, to the Board of Directors and the Board of Statutory Auditors of the Company.

The whistleblowing procedure is concluded, wherever possible, within a period of not more than three (3) months from the receipt of the report.

In any case, within the above-mentioned time limit of 3 (three) months from the date of receipt of the report, the Contact Person is required to provide the Whistleblower with feedback on the report.

The closure of the whistleblowing procedure is notified to the Whistleblower, along with feedback on the outcome of the report.

6.4. CONSERVATION OF DOCUMENTATION

The Contact Person is bound to document, by storing both electronic and hard copy documents, the reports received, in order to guarantee total traceability of the actions undertaken while the report was being processed.

If the outcome of the procedure set in motion by the report does not prompt disciplinary proceedings, a report to the competent authorities, out-of-court action and/or legal proceedings against the alleged perpetrators of the violations, the file will be destroyed within 2 (two) months of the conclusion of the whistleblowing procedure.

If, on the other hand, the outcome of the whistleblowing procedure prompts the launching of disciplinary proceedings, a report to the competent authorities, out-of-court action and/or legal proceedings against the alleged perpetrators of the violations, the case will be filed for a period not exceeding the applicable statute of limitations or obligatory document retention period. At any event, the retention of the whistleblowing documentation cannot exceed a maximum period of five years from the date on which the closure of the report was notified.

At the end of the filing period, the electronic file is subject to destruction and deletion.

7. PROCESSING OF PERSONAL DATA

The personal data collected in the course of the whistleblowing procedure are processed by the Company, in its capacity as Controller, in accordance with EU Regulation 2016/679 ("GDPR") and Legislative Decree no. 196/2003. Personal data are processed lawfully, fairly and transparently. The data are collected for the sole purpose of following up the reports of violations lodged by Whistleblowers.

Any personal data that are clearly not required for processing the report will not be collected or, in the event of accidental collection, will be immediately deleted.

The Contact Persons to manage the Group reporting channel are authorised to process personal data pursuant to art. 29 of the GDPR.

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MyGo S.r.l., in its capacity as the provider of the "My Whistleblowing" platform and the support and maintenance services connected with it and essential to ensure its smooth running, is designated as the party sub-responsible for the processing of personal data pursuant to article 28 of the GDPR.

During the reporting phase, the Whistleblower is required to read the privacy policy on the processing of the personal data collected through the reporting channel. If a report is sent via the "My Whistleblowing" platform, acceptance of the privacy policy included therein is binding for the report to be successfully submitted. Personal data collected during the reporting phase are kept until the conclusion of the whistleblowing procedure and, if necessary, until the actions undertaken subsequent to the outcome of the report have been completed.

The Whistleblower is entitled to exercise the various rights envisaged in articles 15 to 22 of the GDPR relating to the use of their personal data (rectification, updating, deletion, limitation of processing, objection, etc.). The aforementioned rights may be exercised at any time, provided that the conditions are met, by sending a written request to the Contact Persons at the following e-mail address: privacy.afterglass@bormiolilugi.com ;

8. PENALTY SYSTEM

The violation of the provisions contained in the above paragraphs may trigger the sanction procedure; in particular, are subject to sanctions:

- (i) the Whistleblower who has made reports with intent or gross negligence or that prove to be false, unfounded, with defamatory content or in any case made for the sole purpose of harming the Company, the reported person or other parties affected by the report;
- (ii) the person who violated the confidentiality of the reporting agent;
- (iii) the person responsible for acts of "retaliation";
- (iv) the person who obstructed or attempted to obstruct the alert.

For the treatment of sanctions, please refer to the provisions of Model 231.

The above behaviours can also be ascertained by ANAC, which imposes the following fines:

- for the conduct referred to in (i), sanctions from € 500,00 to € 2,500,00, unless the reporting person has been convicted in criminal proceedings, even at first instance, for the offences of defamation or slander or in any case for the same offences committed by reporting them to the judicial or accounting authority;
- for the behaviours referred to in points (ii), (iii), (iv), sanctions from € 10,000.00 to € 50,000.00.

9. PUBLICATION AND DISSEMINATION OF THE PROCEDURE

This procedure is an integral part of the Model pursuant to Legislative Decree no. 231/2001 which, as such, must be approved by the Board of Directors.

This procedure was adopted after informing the members of the RSU (Joint Trade Union) and the trade union associations that are signatories to the CCNL (National Collective Labour Contract) applicable to the employment relations in place at the Company.

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This procedure is available in electronic format on the virtual notice board of the Company's corporate intranet, in a special section on the corporate website at www.bormioliluiqi.com and in hard copy in a dedicated space within the Company's corporate offices, accessible not only to those (employees, collaborators, etc.) who work permanently and continuously at the Company, but also to those who, if only occasionally, find themselves working in the After Glass work environment.

The aforementioned methods of publication and dissemination will be used for subsequent revisions and integrations to this procedure.

For any doubts and for clarifications on how the reporting channel works, on the protection measures provided and, more generally, on the rules of this procedure, please contact the Contact Persons at: odv.afterglass@bormioliluiqi.com.

10. ANNEXES

- **Annex 1: C-AG-LEG-P.01.00.01 REPORT FORM**

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