

QUALITY, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM	PROCEDURE C-GBL-LEG-P.02	BORMIOLI LUIGI GLASSMAKER
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PROCEDURE FOR REPORTING COMPLIANCE INCIDENTS UNDER THE HINWEISGEBERSCHUTZGESETZ ("WHISTLEBLOWER PROTECTION ACT")

Ed.	Date	Amendments	Issued and verified by:	Approved by:	Signed for approval:
1	18/01/2024	New issue	Supervisory Body	Legal Department C. Reggiani	

1. PURPOSE

Bormioli Luigi S.p.A. establishes a reporting channel for its employees in accordance with the requirements of the Whistleblower Protection Act ("HinSchG") that allows employees, business partners and third parties to report violations of national or European law that harm the public interest or integrity of Bormioli Luigi S.p.A. ("Bormioli" or the "Company") or to report identified or reasonably suspected violations of applicable laws and regulations, as well as any other internal policies and guidelines and the Code of Ethics adopted by the Company ("Compliance Violations") of which employees become aware in the course of their employment.

This procedure defines and regulates the activities required for the proper management of the reporting channel by the supervisory body ("OdV") as the body in charge of managing the reporting channel, as well as the measures taken to protect the reporting person ("Whistleblower") and all other persons involved in the reporting process.

2. PERSONAL FIELD OF APPLICATION

The Whistleblower Protection Act regulates the protection of natural persons who have obtained information about violations in connection with their professional activities or in the run-up to professional activities and who report or disclose such information to the reporting bodies provided for under this Act. It also protects persons who are the subject of a report or disclosure and other persons who are affected by a report or disclosure.

3. CONTACT PERSONS APPOINTED TO MANAGE THE REPORTING CHANNEL

The Supervisory Body is authorised to manage the reporting channel. In particular, the reports are received and processed by the following persons ("Contact Person" or "Contact Persons"):

1. Matteo Solimè
E-mail: matteo.solime@bormioliluigi.com
2. Delizia Benasi
E-mail: d.benasi@m2servizi.it
3. Paolo Magotti
E-mail: magotti@m2servizi.it

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If the notification concerns one of the Contact Persons mentioned above, only the notification form attached to this procedure (Annex 1) shall be completed and sent by e-mail to

Veronica Brandini

E-mail: veronica.brandini@bormioliluigi.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 under the HinSchG 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 compliance violations and of which the whistleblower has become aware in the course of his or her work. Administrative, accounting, civil or criminal violations that can be reported fall within this scope. In particular, the following may be reported:

- Violations of applicable national and international laws and regulations, in particular those relating to corruption, bribery, fraud, threats to health and safety, conflicts of interest, discrimination, harassment, antitrust and unfair competition, tax and accounting obligations and money laundering;
- Violations of internal compliance guidelines and regulations, in particular our Code of Ethics;
- Concerns about the safety of the services we provide and products we sell.

However, reports on individual personnel issues that do not constitute compliance violations but relate solely to the individual employment relationship of an employee are not covered. Regardless of this, such issues can still be raised with the human resources department or the direct supervisor.

5. WHISTLEBLOWER PROTECTION MEASURES

5.1. PROHIBITION AGAINST RETALIATION

The Whistleblower is protected against any form of discrimination, punishment or retaliation directly or indirectly related to his/her report.

It should be noted that the following actions, if taken as a result of the report, could constitute a violation of the prohibition against retaliation: Disciplinary action, dismissal or equivalent measures, suspension from employment, demotion or non-promotion, transfer, reduction in pay and change in working hours, disadvantage in legal or economic terms, suspension or restriction of access to training, failure to convert a fixed-term contract or early termination of a contract.

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If the Whistleblower feels that he or she has been discriminated against, retaliated against or threatened as a result of a report, he or she will inform the contact persons who will verify the existence of such discrimination, retaliation or threat and inform the company so that appropriate action can be taken.

The same protections provided for the whistleblower with respect to the prohibition of retaliation also apply to persons who have made an anonymous report but whose identity is later discovered.

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.

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.

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. SUBMISSION OF REPORTS

6.1. FORM OF REPORT

Employees are encouraged to report suspected irregularities, concerns, doubts and suspicions at any time.

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When submitting a report, it is useful to provide a description of your report to better understand and investigate the information reported. The more information provided, the easier it will be to establish the facts. With this in mind, all relevant information on the matter in question, including information on the persons involved and relevant background information, as well as supporting documents or other evidence that may assist in the investigation of your report, should be provided.

When submitting information, the Whistleblower is free to state the identity.

Anonymous reports are permitted. However, the company does not encourage whistleblowers to make anonymous reports as the initial stages of investigation are likely to be more difficult.

The Company encourages whistleblowers to file reports directly and internally with the Company, as compliance violations can compromise core business values and high standards of ethics and integrity.

Whistleblowers are also allowed to report violations to the competent national authorities as well.

Whistleblowers can find out when and how to report under the applicable laws and regulations on the website of the competent national authority. In Germany, the following external reporting bodies are currently open:

- Reporting Office at the Federal Office of Justice
- Federal Cartel Office (in the case of competition law infringements)
- Federal Office for Financial Services Supervision.

6.2. PROTECTION AGAINST REPRISALS AND PROHIBITION OF ABUSE

Protection against retaliation also applies when employees are not absolutely certain of a fact, provided they act in good faith. Acting in good faith means that employees have a reasonable suspicion that the information reported is true, given the circumstances available to them at the time of the report.

However, deliberate misuse of the reporting system for abusive practices (i.e. filing reports in bad faith) is strictly prohibited. Employees who knowingly report false information are not protected and face disciplinary action as well as criminal and civil sanctions.

If employees report violations in which they themselves were involved, this may be considered as a mitigating circumstance in any disciplinary proceedings.

6.3. REPORTING CHANNEL

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

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@bormioliluigi.com

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

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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/bormioli> 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:

BORMIOLI LUIGI
GLASSMAKER

Fill in the form to request the Credentials

Name

Surname

Email

Please do not use your company email

This e-mail will not be visible to the Company. It will only be used to notify you of new communications from the Control Body.

I have read and accepted the Privacy Notice

Send

Are you already registered? [Click to enter](#)
 Forgot password? [Click here to reset](#)
 If you need any help contact us by [clicking here](#)

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:

MY GOVERNANCE
WE DIGITIZE YOUR COMPANY
ZUCCHETTI

Insert your email address

Password

Password dimenticata? [Forgot password?](#)
[Clicca per resettare](#) / [Click here to reset](#)

Non sono un robot

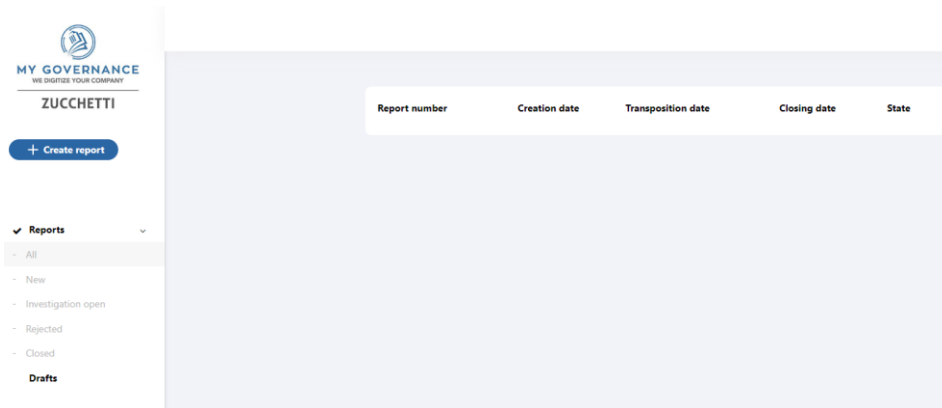
reCAPTCHA
Privacy - Terms

Login

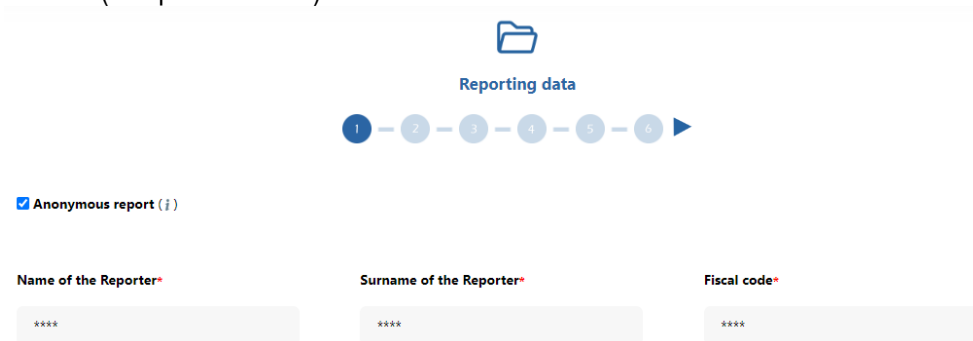
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4. The Whistleblower can proceed to enter the report by clicking on the "CREATE REPORT" button (see photo below):



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.

6.4. HANDLING OF REPORTS BY THE CONTACT PERSON

The processing of the notification 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

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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

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 of the Model and/or the Code of Ethics 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.

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.

6.5. PRESERVATION OF THE 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 whistleblowing procedure will be processed by the Company in its capacity as data controller in accordance with Regulation (EU) 2016/679 ("GDPR") and Legislative Decree no. 196/2003. 196/2003. The personal data will be processed in a lawful, fair and transparent manner. The data is collected for the sole purpose of following up on reports of violations submitted by whistleblowers.

Personal data that is clearly not required for the processing of the notification will not be collected or, in case of accidental collection, will be deleted immediately.

The contact persons appointed to manage the reporting channel are authorised to process personal data within the meaning of Art. 29 of the GDPR.

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MyGo S.r.l., in its capacity as provider of the My Whistleblowing platform and the related support and maintenance services essential for its smooth operation, is designated as a controller of personal data pursuant to Article 28 of the GDPR.

During the reporting phase, the whistleblower must read the privacy statement on the processing of personal data collected through the reporting channel. If a report is submitted via the "My Whistleblowing" platform, acceptance of the privacy statement contained therein is binding for the successful submission of the report.

Personal data collected during the reporting phase will be retained until the conclusion of the whistleblowing procedure and, if applicable, until the completion of the measures taken following the report.

The whistleblower has the right to exercise the various rights provided for in Articles 15 to 22 of the GDPR in relation to the use of his/her personal data (rectification, updating, erasure, restriction of processing, objection, etc.). The above rights may be exercised at any time, provided the conditions are met, by sending a written request to the contact persons at the following email address: titolare.privacy@bormioliluigi.com

8. PUBLICATION AND DISSEMINATION OF THE PROCEEDINGS

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.bormioliluigi.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 Bormioli work environment.

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.bormioliluigi@bormioliluigi.com.

9. ANNEXES

- **Annex 1: C-GBL-LEG-M.02.00.01 REPORT FORM**

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