

WHISTLEBLOWING POLICY

GOLDEN GOOSE



INDEX

01 Purpose of the Policy

02 Definitions

03 Scope of application

04 Management of whistleblowing

05 Duty of confidentiality

06 Whistleblower protection

07 Protection of the person(s) reported

08 Processing of personal data

09 Conflict of interest management

10 Monitoring and review

11 External reporting channels

01 Purpose of the Policy

This Whistleblowing Policy – which replaces the previous document named 'Acts of discrimination, harassment, and abuse reporting process' – governs the process of receiving and handling reports of alleged violations and the relevant methods of investigation, in accordance with current law¹.

This Policy serves as a framework of reference and applies to all companies within the Golden Goose Group (hereinafter the Group), without prejudice to applicable local laws and regulations that may supersede the provisions set forth herein.

It should be noted that the principles outlined in this Policy do not affect or limit in any way the reporting obligations towards the competent judicial, supervisory, or regulatory authorities in the countries in which Golden Goose's companies operate, nor towards any control bodies established within each Group company.

Any person reporting a concern in good faith, as well as any facilitators or other protected persons involved, will be protected from retaliation in the form of negative or adverse actions or consequences in the workplace, and anyone who engages in retaliatory behavior against an actual or suspected whistleblower will be subject to disciplinary action.

1. Directive (EU) 2019/1937; Italian Legislative Decree No. 24 of March 10, 2023 regarding the protection of persons who report breaches of European Union law, including provisions for the protection of persons who report breaches of domestic law (for entities operating in Italy); Italian Legislative Decree No. 231 of June 8, 2001 for the discipline of administrative liability of legal entities, as amended pursuant to the aforementioned Legislative Decree 24/2023 (for entities operating in Italy); any other relevant legislation in force in the countries in which the Group operates.



02 Definitions

CONTROL BODY: body entrusted with the control function of Golden Goose S.p.A. and, if applicable, its Italian and foreign subsidiaries (i.e., the Board of Statutory Auditors).

DETAILED REPORT: a report in which the facts, events, and circumstances of the alleged violation (such as type of offense committed; time reference; value of the monetary impact, if any; cause and purpose of the offense; company, areas, units, people, and/or entities concerned or involved; internal control system anomalies; etc.) are described with a sufficient level of detail to allow the competent corporate bodies, on the basis of the investigative tools at their disposal, to effectively assess the validity of the facts or circumstances being reported.

ETHICS COMMITTEE: collegial body composed of the General Counsel, Internal Audit function, Chief Talent Officer, and Chief Sustainability Officer of Golden Goose, responsible for the management of whistleblower reports (with the General Counsel and Internal Audit function serving as the designated recipients of all reports submitted through the available channels). The Ethics Committee assesses the adequacy of the reporting process and suggests improvements to Golden Goose's Board of Directors accordingly, with the support of relevant functions if deemed necessary.

FACILITATOR: natural person operating within the same work context who assists the whistleblower in the reporting process, and whose collaboration must be kept confidential.

GOOD FAITH: to report in good faith means to have reasonable grounds to believe that a violation has been committed, and that the information reported was true at the time of reporting.

OTHER PROTECTED PERSONS:

- individuals operating within the same work context who are related to the whistleblower by a stable emotional or kinship bond up to the fourth degree
- colleagues within the same work context who share a regular and current relationship with the whistleblower
- entities that the whistleblower owns, works for, or is otherwise connected with in a work-related context.

RETALIATION: any behavior, act, or omission, even if only threatened or attempted, that occurs in response to either an internal report, an external report to the judicial or accounting authorities, or a public disclosure, and that causes or may cause unjust damage to the whistleblower, whether directly or indirectly.

SUPERVISORY BODY: body responsible for exercising oversight of Golden Goose S.p.A. and, if applicable, its Italian subsidiaries that have adopted an organizational and management model pursuant to Art. 6 of Italian Legislative Decree 231/2001 (i.e., the *Organismo di Vigilanza*, or OdV).

THIRD PARTY: any individual or entity acting for or on behalf of the Group, including but not limited to: distributors, retailers, agents, intermediaries, independent contractors, consultants, sales representatives, joint venture partners, accountants, legal representatives, lobbyists, customs brokers, logistics companies, and supply chain partners.

WHISTLEBLOWER: person who reports or publicly discloses information on discriminatory acts, harassment, abuse, or other behaviors and/or violations falling within the scope of this Policy, which they have personally experienced or witnessed, or of which they have direct knowledge owing to their function within the Company.



03 Scope of application

Golden Goose promotes an open culture, emphasizing the importance of employees and other stakeholders raising any concerns or doubts so that the Company may assess them, investigate, and gather additional information, if necessary.

Pursuant to this Policy, any person who becomes aware of actual or potential wrongdoing in a work-related context can submit a report, even in their native language, through the reporting channels at their disposal.

03.1 WHO CAN REPORT A CONCERN?

Reports can be submitted by:

- shareholders and individuals in administrative, managerial, control, supervisory, or representative positions, even if in a *de facto* capacity
- all Group employees (under employment contracts, collaboration agreements, or self-employed, as well as paid or unpaid volunteers and trainees)
- third parties.

2. The work-related context, and the information obtained therein, also encompasses the selection process, the pre-contractual stage, the probationary period, and the duration of the employment relationship, even if the report is submitted after employment termination.

03.2 WHAT CAN BE REPORTED?

The violations of which a person has become aware in a work-related context² and that can be reported include:

- violations of the Group's Code of Ethics and core values and principles
- violations of laws and regulations³
- violations of regulatory provisions
- violations of corporate policies
- violations of human rights, including any act of discrimination, harassment, or abuse
- behaviors that cause or may cause damage or prejudice to the Group, even if only reputational.

Reports must be based on facts, without bias, prejudice, or ulterior motives. Any misleading reports submitted in bad faith based on false accusations or with malicious intent may result in disciplinary action.

3. In particular, pursuant to Italian Legislative Decree No. 24 of March 10, 2023 implementing Directive (EU) 2019/1937, the following violations can be reported: i) unlawful conduct under Italian Legislative Decree 231/2001 (known as 'predicate offences' for the administrative liability of entities) or violations of the organizational and management model adopted by the entity; ii) offenses, behaviors, acts, and omissions as per Art. 2, par. 1, letter a), Nos. 3, 4, 5, and 6.

03.3 WHICH REPORTING CHANNELS ARE AVAILABLE?

Anyone who wishes to file a report in good faith can do so using the **Ethics and Integrity Line**, which guarantees the anonymity and confidentiality of the whistleblower also through the use of encryption tools.

The **Ethics and Integrity Line** can be reached at goldengoose.integrityline.com in the countries where available.

Alternatively, reports may also be submitted through the following channels:

- the dedicated email at ethics@goldengoose.com
- in person (one-to-one meetings): employees can make a report in person by requesting a one-to-one meeting with the Internal Audit function and/or the General Counsel
- by post to: Ethics Committee c/o Golden Goose S.p.A. - Via Privata Ercole Marelli 10 - 20139 Milan, Italy.

Regardless of the channel, when submitting a report, whistleblowers have the right to remain anonymous or to voluntarily reveal their identity if deemed necessary. In either case their confidentiality is guaranteed.

However, they are encouraged to disclose their name and/or contact details in order to facilitate the appropriate investigations, if any.

03.4 WHAT INFORMATION SHOULD BE INCLUDED IN THE REPORT?

The contents of the report should be based on truthful and factual information and submitted in good faith. Reports must include the following information:

- name(s) of the person(s) being reported
- time reference of the alleged violation
- location of the alleged violation
- a description of the alleged violation
- circumstances related and/or leading to the alleged violation
- estimated frequency of the alleged violation.

It is not necessary for the whistleblower to have full knowledge or evidence of the alleged violation in order to report it through the designated channels.

Furthermore, any doubts can be discussed in full confidentiality with the General Counsel and Internal Audit function, as mentioned above.

04 Management of whistleblowing

Reports are processed according to the following stages:

- receipt
- preliminary assessment
- investigation
- closure
- feedback
- reporting on whistleblowing cases.

04.1 RECEIPT

Regardless of the reporting channel, the designated recipients of all reports are Golden Goose's General Counsel and Internal Audit function, who are responsible for acknowledging receipt within seven days. Reports received verbally will be transcribed and documented in writing, and submitted to the respective whistleblowers for verification and approval.

If a report is received through channels other than those indicated in this Policy, the person who received the report must immediately forward it through the official reporting channels, adhering to the highest standards of confidentiality and following the appropriate procedures, so as to protect the whistleblower and the identity and integrity of the person(s) being reported, and not compromise the effectiveness of subsequent investigations.

Every report received through one of the designated reporting channels will be assigned a unique and sequential case number within the **Ethics and Integrity Line** system, and will be tracked and reviewed accordingly.

04.2 PRELIMINARY ASSESSMENT

Golden Goose's Internal Audit function conducts an initial assessment of any report received and classifies it based on the nature and description of the facts, events, or circumstances being reported.

The Internal Audit function then informs the Ethics Committee and, with the support of the competent functions, prepares the supporting documents and information required to either open an investigation or file the case.

If deemed relevant, based on the subject matter of the report and the geographic location of the whistleblower, the Internal Audit function may request the relevant local function(s) (e.g., Talent, Legal Affairs, Finance) to participate in the preliminary assessment and, if necessary, in the subsequent investigation, to ensure compliance with applicable local laws and regulations and respect for local culture and practices, granting them formal authorization as per applicable law.



04.3 INVESTIGATION

The purpose of the investigation process is to review, assess, and analyze the reported allegations. Depending on the circumstances, the investigation is conducted by the Internal Audit function either independently or, if deemed necessary or appropriate, with the support of other internal functions or an external consultant, ensuring the necessary confidentiality of the process.

Given the varied nature of the reports, it is not possible to predict the exact duration for the completion of the investigation process, which in any case must be conducted as quickly as possible without compromising the quality and thoroughness of the process itself.

Investigations will be fair, impartial, meticulous, and well-planned. Upon completion of the investigation process, the Internal Audit function will prepare a report to be submitted to the Ethics Committee, unless the latter participated in the process.

To ensure the effectiveness of the investigation, as well as fair disciplinary measures, the individuals conducting the investigation must have free and unrestricted access to all relevant documents and Company premises throughout the process.

Furthermore, they must be able to maintain independence at all times, and be free to conduct the investigation and substantiate the facts without any external influence, interference, or fear of reprisal.

04.4 CLOSURE

Without prejudice to the above, the Ethics Committee (and the relevant functions where deemed necessary) will:

- review the investigation report and its findings
- determine whether the investigation was sufficient or if further investigations are needed
- approve any measures deemed necessary or appropriate to address the issues highlighted in the investigation report.

04.5 FEEDBACK

Golden Goose's Internal Audit function or General Counsel will provide feedback to the whistleblower on the status of the report within three months from the date of the acknowledgment of receipt. If the report is still under investigation at this time, a new update will be provided within the following three months. In any case, Golden Goose's Internal Audit function or General Counsel will provide feedback to the whistleblower when the procedure is closed.

Whistleblowers must bear in mind that any information shared with them regarding an investigation and the actions taken in connection therewith must be treated as confidential.

The Group cannot guarantee that an investigation will lead to the whistleblower's desired or expected outcome. However, Golden Goose is committed to addressing any legitimate concerns in a fair and appropriate manner.

04.6 REPORTING ON WHISTLEBLOWING CASES

The Ethics Committee will provide Golden Goose's Control Body and Board of Directors with a report on the whistleblowing cases processed in the period of reference, either on a semi-annual basis or as needed.

Likewise, it will provide the CEOs/managing directors of the other Group companies with a report on the cases that originated from, or had an impact on, their respective organizations, so that they may in turn inform their respective control bodies of reference.

Furthermore, in the event of reports regarding relevant violations pursuant to Italian Legislative Decree 231/01, or violations of the Organizational and Management Model adopted by Golden Goose, the Ethics Committee will provide timely updates to the Supervisory Body at each of the following stages, while ensuring anonymity and confidentiality:

- upon completion of the preliminary assessment
- upon completion of the investigation
- upon closure of the procedure.

Based on each update, the Supervisory Board may ask the Ethics Committee to conduct further in-depth investigations and/or specific inquiries.

05 Duty of confidentiality

All Group employees involved in any capacity in the processing of the reports must ensure the utmost confidentiality regarding the existence and contents of a report and the identities of the reporting and reported persons.

Every exchange of information regarding the existence and content of a report, or the identities of the reporting and reported persons, must be strictly on a 'need to know' basis. To this end, the **Ethics and Integrity Line** allows tracking, for each report, what information has been shared and with whom.

These individuals are expressly authorized to handle and process such information pursuant to Art. 29 and Art. 32(4) of Regulation (EU) 2016/679, and

Art. 2-quaterdecies of the Personal Data Protection Code pursuant to Italian Legislative Decree 196/2003.

In all cases where the name or other personal data of the whistleblower were provided with the initial report, this information will be removed from the contents of the report before the latter is processed by the Ethics Committee and other authorized individuals, and replaced with the case number assigned when the report was received.

The Group ensures the confidentiality of the identity of whistleblowers and any facilitators from the moment the report is received, regardless of the reporting channel, in accordance with the provisions of the law.



06 Whistleblower protection

06.1 WHISTLEBLOWER PROTECTION AGAINST RETALIATION AND DISCRIMINATION

In compliance with the law and the Group's Code of Ethics, it is strictly prohibited to retaliate or discriminate in any way against whistleblowers, facilitators, other protected persons, or those who assisted in investigations. Any and all retaliatory or discriminatory behavior will be subject to penalties, even if a report is subsequently found to be unsubstantiated.

The protective measures in place against retaliatory and discriminatory behavior also apply to anonymous whistleblowers if eventually identified.



07 Protection of the person(s) reported



The Group requires everyone's collaboration to ensure mutual respect within the organization, and strictly prohibits any behavior or actions that may undermine the dignity, integrity, and reputation of others. Therefore, the confidentiality provisions outlined in this Policy also apply to any person being reported.

A person who has been reported cannot be subjected to disciplinary sanctions in the absence of concrete, objective evidence of the alleged violation, or if the reported facts were not duly investigated, or if the person reported was not granted the opportunity to contest the charges in accordance with applicable laws and/or contractual procedures.

It should be noted that a person who has been reported is not allowed to inquire about the identity of the whistleblower, except in cases expressly provided for by law.

08 Processing of personal data

The processing of personal data in relation to the reports is carried out in accordance with Regulation (EU) 2016/679 (i.e., the General Data Protection Regulation, or GDPR) on the protection of personal data, as well as with other applicable laws and regulations to the extent that they are compatible with the GDPR itself.

In handling the reports for the purposes stated in this document, the information that is processed includes the personal data of whistleblowers and the person(s) being reported (i.e., name, position held, etc.), as well as any additional information relevant to the alleged violations and subsequent investigations, or regarding any third parties involved in the case. Golden Goose will only process the data that is strictly necessary for report management purposes, and will promptly erase any information that is excessive or irrelevant, or that was collected inadvertently. In this regard, whistleblowers are advised to provide only the information that is strictly necessary to process the report, omitting any personal data belonging to special categories that could reveal the identity or sensitive facts about the whistleblowers themselves and/or the person(s) being reported (e.g., personal identification numbers, bank details, criminal records, health information, sexual orientation, and/or religious beliefs) while not being pertinent or relevant to the report.

If deemed necessary, the person(s) being reported and the third parties involved, if any, may not be immediately notified about the processing of their personal data, so as to avoid compromising the effectiveness of an investigation into the merits of an allegation and/or the collection of evidence. This measure is taken for the time strictly necessary to ensure the proper management of investigations, in compliance with the provisions of applicable national collective bargaining agreements.

The legal basis for the processing of personal data is the fulfilment of Golden Goose's obligations under its Code of Ethics and Inclusion & Belonging Act, also in light of Italian Legislative Decree 231/01, Directive (EU) 2019/1937, and Italian Legislative Decree 24/2023, as well as its legal and

contractual obligations, including those towards employees and collaborators.

Furthermore, where mandated by applicable law, the legal basis for data processing is the explicit consent of the whistleblowers and other parties involved, obtained in the manner deemed appropriate and pursuant to the provisions of the law. If obtaining the data subjects' consent proves difficult, Golden Goose may still process their data where permitted by applicable law, if deemed necessary to protect the life, property, rights, and relevant legitimate interests of the data subjects themselves or other individuals.

Personal data is accessible to the members of the Ethics



Committee and to a limited number of individuals who provide support to the Ethics Committee. The data is also available to any other colleagues who may be involved in the report management process and in the activities connected therewith, strictly on a need-to-know basis and limited to what is required for the purpose at hand.

In certain cases, personal data may also be shared with external consultants and professionals (e.g., legal representatives) or public authorities if a reported matter requires specific measures, including judicial and legal actions, to safeguard and protect Golden Goose and/or other third parties.

All personal data related to the reports will be stored and processed in Italy. However, relevant information pertaining to individual reports may be shared abroad if deemed necessary to facilitate their processing. In such instances, Golden Goose will protect the personal data being transferred to other countries, including outside the European Union, through all necessary organizational and technical security measures.

Golden Goose will store personal data for no longer than is strictly necessary for the purpose for which it was collected – or, in any case, for no longer than five years from the date of communication of the final outcome of the reporting procedure. This means that personal data will be stored for the period of time required to process the reports and to compile documentary evidence, should this be necessary to ensure the protection of Golden Goose and/or other third parties, including judicial protection. Personal data will be stored in both physical and electronic filing systems, in closed records accessible only to authorized individuals.

Data subjects retain the right to contact the Data Controller at privacy@goldengoose.com to request, within

the limits of the law, access to and rectification or erasure of their personal data, the restriction of processing, or data portability. They also have the right to lodge a complaint with the competent data protection authorities for unlawful data processing.

However, should there be a real risk that the exercise of the data subjects' rights pursuant to Articles from 15 to 22 of the GDPR (which are exercisable through a request to the Data Controller or a complaint filed with the competent data protection authorities for unlawful processing) may breach the confidentiality of the whistleblower's identity, or compromise the effectiveness of investigations into the merits of allegations and/or the collection of necessary evidence, Golden Goose reserves the right to limit or delay the exercise of such rights, in accordance with applicable laws.

In light of the above, whistleblowers may be asked to acknowledge that they have received and read the personal data processing information provided herein, or to give their consent to the transfer of personal data to Golden Goose S.p.A. from other countries, as per specific local legal requirements. In such instances, Golden Goose will fulfil all relevant obligations in accordance with applicable laws and ensure adequate levels of personal data protection.

09 Conflicts of interest management

If a report involves, either directly or indirectly, one or more members of the Ethics Committee, they will be excluded from the management of the report itself.

Furthermore, in the event of circumstances or situations in relation to which a member of the Ethics Committee has a conflict of interest, that individual is required to disclose it.

The other members of the Ethics Committee will then determine if the conflicted member should be excluded from meetings regarding reports related to the specific conflict.



10 Monitoring and review

The Ethics Committee is responsible for the proper functioning of the report management process and its regular monitoring, by defining:

- areas to be monitored
- monitoring methods
- measurement and assessment timeframes
- communication channels of monitoring outcomes.

The Ethics Committee provides Golden Goose's Board of Directors with documented information ensuring the traceability of the activities performed, as evidence of the results achieved.

It is also responsible for the periodical revision of this Policy and of report management system, and for reporting the results of its activities to the Board at scheduled intervals to ensure the ongoing suitability, adequacy, and effectiveness of the process.



11 External reporting channels

08.1 EXTERNAL REPORTING CHANNELS AND PUBLIC DISCLOSURES – VALID FOR ITALY ONLY

Whistleblowers are entitled to file a complaint with the competent judicial authorities, utilize any available external reporting channels, and/or make a public disclosure, in accordance with applicable legislation. In each of these cases, the Group will protect the whistleblowers, facilitators, and other protected persons as per the provisions of this Policy (e.g., protection against retaliation).

With particular regard to external reporting channels, whistleblowers may file a report with the Autorità Nazionale Anticorruzione⁴ (ANAC – <https://www.anticorruzione.it/-/whistleblowing>) if the violation being reported meets the criteria of Italian Legislative Decree 24/2023, available at the same link.

4. Italian national anti-corruption authority.





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GOLDEN GOOSE