

# Whistleblowing Reports Procedure

## EXECUTIVE SUMMARY



Since 2017 BSCCB has set up information whistleblowing channels of irregularities or violations.

Starting from July 2023 the whistleblowing procedure (P029) has been updated, introducing even more protections for the whistleblower, in accordance with the European Directive and its transposition in Italy with Legislative Decree No. 24/2023 and in Germany with the Whistleblower Protection Act.

### **FREQUENTLY ASKED QUESTIONS**

#### **How can I file a report related to BSCCB S.p.A.?**

The **Global Central Function Internal Audit** of Brembo N.V., as autonomous department with personnel specifically trained for the management of the whistleblowing channel, in the person of the *Chief Internal Audit Officer* is entrusted for the management of the internal reporting channel having the task of receiving any whistleblowing reports from everyone related to BSCCB S.p.A.

Reports can be submitted **both written and oral form, including anonymously**, through:

- the web platform [Legality Whistleblowing](#)
- the Legality Whistleblowing App Mobile.



this new platform is in place to even better guarantee, through IT and encryption tools, the obligation of confidentiality of the whistleblower, of the persons concerned and of the persons mentioned in the report as well as of the content of the report and of the related documents.

#### **How can I file a report related to BSCCB GmbH?**

The German **Interne Meldestelle (Ombudsperson)** is entrusted for the management of the internal reporting channel having the task of receiving any whistleblowing reports from everyone related to BSCCB GmbH.

Reports related to breaches have to be addressed to the **Interne Meldestelle (Ombudsperson)**'s channel through:

- Verbal reports to the "Interne Meldestelle (Ombudsperson)";
- Ordinary mail or by hand ([sealed envelope](#) "strictly confidential" to notify to **Interne Meldestelle (Ombudsperson) "HSK | Service"** to the attention of Rechtsanwalt Mr. Prof. Dr. Sandmann, Steingasse 13, 86150 Augsburg (Deutschland);
- E-Mail ([service@hsk-arbeitsrecht.de](mailto:service@hsk-arbeitsrecht.de));

#### **Which are the principles of the whistleblowing channel?**

- obligation of confidentiality of the identity of the whistleblower and of the people involved in the report
- IT security measures guaranteeing the obligation of confidentiality
- protection of the whistleblower by any kind of retaliation

#### **Who can report?**

Any person connected with the activities of BSCCB Group, such as employees and collaborators, suppliers and customers, shareholders and people who hold administration, management, control, supervision or representation positions.

#### **What can be reported?**

- violations of regulatory provisions in the context of the activity of the BSCCB Group
- violations of BSCCB S.p.A. Organizational Management and Control Model in accordance with the Italian Leg. Decree 231/01
- violations of other code of conducts, company policies and procedures of BSCCB

The updating of the BSCCB whistleblowing procedure (P029) has been approved by our Board Directors in its meeting on October 28<sup>th</sup> 2025.