

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

## INDEX

1. DEFINITION .....	1
2. OBJECTIVE.....	3
3. FIELD OF APPLICATION .....	4
4. CONTENTS.....	4
5. REPORTING SYSTEM.....	4
5.1 How to file a report.....	4
5.2 What to report .....	5
5.3 Reporting channels .....	5
5.3.1. Internal reporting channels .....	5
5.3.2. External reporting channels.....	7
5.4 HOW THE REPORT WILL BE HANDLED .....	7
6. SAFEGUARDS .....	8
7. DATA PROTECTION .....	10
8. DISCIPLINARY SYSTEM.....	10

### 1. DEFINITION

For the purposes of this document, the following definitions shall apply:

“**Barilla**” or “**Barilla Group**” means any existing legal entity, directly or indirectly controlled by Barilla Holding S.r.l.

“**Breach/es**” stands for any act or omission that constitutes a breach of applicable law or Barilla’s policies and procedures or otherwise infringes the public interest.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

In any case, this term should include the breaches that can be reported according to the Whistleblowing Legislation (as defined below).

**“Corporate Associate(s)”** stands for any:

- i. Barilla’s current or former employee, worker, consultant or self-employed professional;
- ii. Barilla’s shareholder and/or person exercising (either directly or indirectly) an administrative, management, supervisory or representative function within the Barilla Group;
- iii. Barilla’s volunteer or trainee;
- iv. person working under the supervision and direction of Barilla’s contractors, subcontractors and suppliers;
- v. other person otherwise performing their activity on behalf of and/or for the benefit of any company belonging to the Barilla Group;
- vi. Barilla’s job applicants even though their application was rejected, to the extent they acquired the information reported in the context of their application process.

This definition includes the pre- and post-contractual phase and/or the probationary period of the roles mentioned in in the paragraphs from i. to vi. above.

**“Facilitator”** means a natural person who helps a Reporting Person (as defined below) to file a report or assists a Reporting Person in the reporting process and operates in the same Work-Related Context.

**“Global Compliance and Audit Committee”** stands for Barilla’s corporate body provided with autonomous initiative and control powers, which monitors the effectiveness, adequacy, maintenance and updating of Barilla’s Code of Ethics. It is composed by a Barilla Family member, Chief Internal Audit Officer, Chief Legal, Compliance and Communication Officer and two external members, Jonathan King, Marco Ziliotti.

**“Person Concerned”** means a natural or legal person who is referred to in a Report or in a public disclosure as a person to whom the Breach is attributed or with whom the person is associated.

**“Report”** means the oral or written communication of information on any Breach.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

“**Reporting Person**” stands for the Corporate Associate or any other individual filing or willing to file a Report using either the Whistleblowing System or external reporting channels or any other person falling under the said definition according to Whistleblowing Legislation (as defined below).

“**Whistleblowing Legislation**” means the local whistleblowing legislation, where applicable to Barilla legal entities, as well as any applicable law to this Policy and its content.

“**Local Policy**” stands for the Barilla’s local whistleblowing policy specifically drafted for each Barilla legal entity to whom specific national Whistleblowing Legislation requirements apply.

“**Whistleblowing System**” means the organizational and technical measures, tools and policies implemented by Barilla for ensuring compliance with Whistleblowing Legislation and regarding the reporting of information useful to the protection of Barilla’s and third parties’ welfare and reputation.

“**Work-Related Context**”: means any current or past work activities through or in the context of which, irrespective of their nature, a person may acquire information on Breaches and within which such person may suffer retaliation if they report them.

“**Local Whistleblowing Committee**” means the body provided with autonomous initiative and control powers, which monitors the effectiveness, adequacy, maintenance and updating of Barilla relevant Whistleblowing System. It is composed by Regional HR, Regional Lawyer, Legal Compliance and/or Group Internal Audit representatives.

## 2. OBJECTIVE

The purpose of this Corporate Whistleblowing Policy (hereinafter referred to as the “Policy”) is to promote an appropriate use of the Whistleblowing System implemented by Barilla to foster its corporate culture underpinned by the principles of responsibility, transparency, respect for diversity, inclusivity, fairness and integrity, in line with Barilla’s Code of Ethics.

The Policy has been defined by Group Legal, Compliance and Communication also to ensure full compliance with applicable law as well as with the company’s rules and relevant regulations, including Barilla’s Code of Ethics, as well as preventing events that could cause non-compliance with the same.

The Policy shall be read in conjunction with the Code of Ethics, available on [Barillagroup.com](http://Barillagroup.com) website, the “Integrated Compliance System Corporate Policy” and its related policies and procedures, available on OneBarilla.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

## 3. FIELD OF APPLICATION

The Policy applies to all the Barilla Group entities, all Corporate Associates, all Reporting Persons and Persons Concerned, as well as any other person to which the Whistleblowing Legislation applies.

As this Policy is intended to apply to various jurisdictions, Local Policies will be implemented where necessary under applicable Whistleblowing Legislation.

## 4. CONTENTS

Unlawful, unethical and discriminatory behaviours may occur in any organization and can take many forms, such as corruption, fraud, malpractice, harassment or negligence. If not addressed, they can cause serious harm to the organization, its employees and, in some cases, even to the public interest.

The Barilla Group has implemented a Whistleblowing System to encourage and make it easier to report genuine information or concerns about (alleged) Breach or wrongdoings, which constitutes the essence of the whistleblowing.

The Whistleblowing System is only meant to prevent damages and detect threats to Barilla's, its Corporate Associates, as well as to third parties', integrity and reputation, therefore it shall be used freely, in good faith, on a voluntary basis and exclusively for such purposes.

In light of the recent entry into force of the new Whistleblowing Legislation, this updated version of the Policy is also intended to inform you about the changes we undertook to ensure full compliance with the Whistleblowing Legislation.

## 5. REPORTING SYSTEM

### 5.1 HOW TO FILE A REPORT

The Reporting Person can decide to use the Whistleblowing System by filing a Report either:

- anonymously, or
- indicating their identity and contact details.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

## 5.2 WHAT TO REPORT

The Report shall include information about concerns and/or reasonable suspicions regarding any actual or potential Breach of:

- Barilla's Code of Ethics;
- Barilla's policies or procedures;
- applicable laws and regulations,

about which the Reporting Person has become aware of in the Work-Related Context.

Facts, information and documents, whatever their form or medium, the revelation or disclosure of which is prohibited by the provisions relating to national defence secrecy, medical secrecy, secrecy of judicial deliberations, secrecy of the investigation or the judicial instruction or to the professional secrecy of the lawyer are excluded from the scope of this Policy and cannot be reported through the Whistleblowing System. In addition, the Report shall be:

- based on factual and consistent elements;
- sufficiently detailed;

and (possibly) accompanied by solid evidence (e.g., documentation).

Indeed, in case the Report is insufficiently detailed and Barilla is unable to contact the Reporting Person to collect more information on it, Barilla may not be able to investigate further the matter reported.

## 5.3 REPORTING CHANNELS

### 5.3.1. Internal reporting channels

Internal Reports may be submitted either in writing or orally.

Written internal Reports can be filed according to one of the below methods:

- Through the online "Barilla Whistleblowing Platform" available at <http://barilla.ethicspoint.com>, selecting the country/legal entity in which violation took place. If the

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

legal entity is not in the list, please select “Barilla Headquarters”. If you believe that the parent company would be better able to manage the report or if, for example, you have any doubts as to where the behavior took place or what should be reported, you can select “Barilla Headquarters”.

- By email to the dedicated email address [ethics\\_compliance@barilla.com](mailto:ethics_compliance@barilla.com);

Oral Reports can be filed:

- By contacting "Barilla Whistleblowing Hotline" at the following numbers:
  - 800 715 057 for Italy,
  - 0 800 99 06 97 for France,
  - 0800 1817622 for Germany,
  - 020-12 70 04 for Sweden,
  - 8 (800) 100-69-47 for Russia,
  - 800 848 1589 for Greece,
  - (833) 573-1751 for USA
- In an in-person or online meeting with the Global Compliance and Audit Committee. To schedule a meeting, it is possible to write to [ethics\\_compliance@barilla.com](mailto:ethics_compliance@barilla.com) or directly to any of the member at the following addresses:
  - o Massimo Ferrari: [massimo.ferrari@barilla.com](mailto:massimo.ferrari@barilla.com)
  - o Francesco Giliotti: [francesco.giliotti@barilla.com](mailto:francesco.giliotti@barilla.com)
  - o Jonathan King: [jonathan.king@external.barilla.com](mailto:jonathan.king@external.barilla.com)
  - o Marco Ziliotti: [marco.ziliotti@external.barilla.com](mailto:marco.ziliotti@external.barilla.com)

A meeting will be scheduled within 20 working days from the date of the request.

Given Barilla’s commitment to create a safe and inclusive Whistleblowing System, Barilla strongly encourages the Corporate Associates to use the internal reporting channels.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

## 5.3.2. External reporting channels

Where permitted by Whistleblowing Legislation, the Reporting Person can file the Report to the competent external reporting channels (where existing).

## 5.4 HOW THE REPORT WILL BE HANDLED

Once a Report is filed, the Reporting Person will receive acknowledgment of receipt of the Report within 7 days of that filing.

In case an internal Report is directed through channels other than the ones at paragraph 5.3 above, the receiving person/body will make sure to transmit the Report to the competent internal bodies and will communicate this transmission with an acknowledgment of receipt.

Reports sufficiently detailed will be managed as follows:

**Preliminary Analysis:** Local Whistleblowing Committee, or the Global Compliance and Audit Committee if engaged directly by the Reporting Person as set out above, will review the Report to ensure that it meets the requirements set out by the Whistleblowing Legislation, is supported by accurate and consistent facts and is sufficiently detailed. If necessary, further information on the circumstances of the Report will be asked to the Reporting Person.

If the Report does not meet the requirements set out by the Whistleblowing Legislation, the Report will be closed and the Reporting Person will be informed of such outcome promptly and in writing, along with the reasons why their Report does not meet the requirements.

**Competence assessment:** Global Compliance and Audit Committee is responsible for Reports relating to ethical or compliance violations of particular significance.

Reports of a different nature, not falling under the responsibilities of Local Whistleblowing Committees or Global Compliance and Audit Committee will be evaluated on a case-by-case and need-to-know basis in order to identify the competent function.

In any case, Global Compliance and Audit Committee will be informed of the outcome of any Report.

**Investigation and handling:** through the investigative measures the competent body handling the Report deems most appropriate, also involving any relevant corporate functions, said body will assess the reported facts validity.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

**Recommendation:** the competent body handling the Report will make a recommendation to the relevant functions for corrective action to be taken to address the issues raised. If the recommendation involves, inter alia, the adoption of disciplinary measures, it will be forwarded to HR for evaluation.

If the Report relates to facts or events that occurred or are likely to occur in another entity belonging to Barilla Group, the Reporting Person may be invited to file another report in that other entity as well. Furthermore, if the Report could be handled in a more efficient way by that other entity only, the Reporting Person can be invited to withdraw their Report and file a new Report with the other entity only.

Reports sufficiently detailed, which fall outside the competence of Global Compliance and Audit Committee, will be forwarded to the relevant Local Whistleblowing Committee for handling, after obtaining consent by the Reporting Person.

Barilla will ensure a diligent and timely follow-up to the Report and will provide a prompt feedback to the Reporting Person. In any case, feedback on the Report will be provided within 3 months from the acknowledgment of the receipt.

If the allegations contained in the Report have been found to be inaccurate or ill-founded, or if the Report has become irrelevant, the Report will be closed and the Reporting Person will be informed of this outcome in writing.

## 6. SAFEGUARDS

Irrespective of the reporting channel used, Barilla will grant to the Reporting Person and the Facilitator with the following safeguards:

- **confidentiality:** the Whistleblowing System, from the filing of the Report to the managing of the reporting, including any whistleblowing outcome, ensures the utmost confidentiality of:
  - the identity of the Reporting Person and of any third party mentioned in the Report (including the Concerned Person) as well as of any information from which the identity can be inferred from.
  - any other information that is protected under the Whistleblowing Legislation or other applicable laws.



# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

– Barilla will seek the Reporting Person’s prior and voluntary consent to disclose the Reporting Person’s identity;

Except for the cases where Barilla will be legally required to share this information or where the Reporting Person has no right to the protection according to the Whistleblowing Legislation, the confidentiality protection will be maintained in the course of the entire whistleblowing process, including during any disciplinary process arising out of the Report.

Even if the disclosure of the Reporting Person’s identity may be useful in the context of a disciplinary process against the Person Concerned or in a litigation, Barilla will request the Reporting Person’s previous consent to the disclosure.

- **anti-retaliation:** Barilla adopts measures in order to protect the Reporting Person from any retaliatory measure taken against them for having filed the Report. Retaliatory measures include any direct or indirect act or omission which occurs in the Work-Related Context and which causes or may cause unjustified detriment to the Reporting Person, including, by way of mere example: harassment, intimidation, adverse employment consequences (e.g. dismissal, lower performance ratings, downgrading, withholding of promotion, reduction in wages, unjustified transfer etc.) or any behaviours that can be qualified as “mobbing”, even if attempted or threatened.

Depending to applicable Whistleblowing Legislation, the anti-retaliation protection applies also to:

- the Facilitator;
- individuals and entities connected to the Reporting Person according to the criteria set out by the Whistleblowing Legislation;
- any other person who is entitled to the same protection according to the Whistleblowing Legislation.

The Concerned Person, who has understood, for any reason, the identity of the Reporting Person, must not have any contact with the Reporting Person on the allegation, even if the Concerned Person thinks that it is a mere misunderstanding that can be easily handled among themselves.

# CORPORATE WHISTLEBLOWING POLICY



<i>Function</i>	Group Legal, Compliance and Communication	<i>Issue</i>	15
<i>Rev. Date</i>	January 2024	<i>Rev. n°</i>	03
<i>Editing</i>	Claudio Melodia	Legal Counsel – Compliance, Group Data Protection Officer	
<i>Owner</i>	Francesco Giliotti	Chief Legal, Compliance and Communication Officer	

## 7. DATA PROTECTION

The processing of personal data in the management of the reporting channels and the Reports received must be carried out in accordance with the GDPR and the applicable local data protection regulations.

Barilla defined its own model for the receipt and management of reports, identifying technical and organisational measures suitable to guarantee a level of security appropriate to the specific risks arising from the processing carried out, based on a data protection impact assessment.

In particular, all persons who in any way are involved in the receipt and management of Reports have been adequately instructed and bound to confidentiality: the relationship with external suppliers that process personal data on behalf of Barilla is in fact governed by a specific contract pursuant to Article 28 of the GDPR, while the persons responsible for receiving or following up Reports pursuant to this Policy are authorized to process the personal data relating to the Reports pursuant to Articles 29 and 32 of the GDPR. In addition, Reporting and Concerned Persons shall be provided with adequate information pursuant to articles 13 and 14 of the GDPR.

Finally, Barilla undertakes not to collect or, if collected, to immediately delete personal data that are clearly not useful for the processing of a specific Report.

## 8. DISCIPLINARY SYSTEM

Barilla expects Corporate Associates to co-operate in maintaining a working environment based on reciprocal respect for the dignity, integrity, transparency and reputation of all individuals, in line with the Barilla's Code of Ethics.

Hence, any breach of this Policy shall be sanctioned in proportion to its severity and in accordance with the applicable laws, contract provisions and company's standards in force in every country. Disciplinary sanctions may be applied also in case of specious, pretentious or bad faith Report.

If the Reporting Person files a Report in good faith and the investigation does not find any evidence of wrongdoing, no disciplinary actions shall be taken.

Barilla reserves the opportunity to report any criminal violation to the relevant Judicial Authorities.