



WHISTLEBLOWING POLICY

**Handling of reports of unlawful conduct or
wrongdoing**





Corporate Process Owner:

- HR Compliance Department

Verified by:

- Group Chief Legal Officer

- Group Chief Human Resources Officer

- Group Chief Institutional Relations & Sustainability Officer

- Group Chief Internal Auditor

Approved by:

- Group Chief Executive Officer

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CONTENTS

FOREWORD	2
PURPOSE OF THE POLICY	3
POLICY PUBLICATION	5
SUBJECT OF REPORTS	5
REPORTING REQUIREMENTS	6
HANDLING OF REPORTS	7
RECIPIENTS OF REPORTS	9
ACCEPTANCE AND PRELIMINARY INVESTIGATION OF RELEVANT REPORTS	10
CONFLICT OF INTEREST SITUATIONS	10
DECISIONS BASED ON REPORTS	11
PROTECTION OF THE WHISTLEBLOWER AND THE PERSON CONCERNED BY THE REPORT	13
RECORD KEEPING OF THE REPORTS	14
ANNEX 1 – PROCEDURE FOR HANDLING REPORTS	15

FOREWORD

For the Lavazza Group, **compliance with the values and principles enshrined in its Code of Ethics is the responsibility of all** — those who work in the Group, those who work on behalf of the Group, and third parties.

In order to safeguard the values of integrity and ethical behaviour expressed in its Code of Ethics, the Lavazza Group **supports and encourages anyone** intending to report potential inappropriate conduct, misconduct or alleged breach of the principles set forth in its Code of Ethics, in its Organisational Model pursuant to Italian Legislative Decree No. 231/2001 (and similar documents in other countries), in Group policies and procedures and, in general, potential breaches of laws and regulations.

Everybody is invited to report any misconduct or unacceptable behaviour, so that such occurrences can be promptly stopped and action can be taken against the person(s) to whom the misconduct or unacceptable behaviour is attributed. **Inadequate handling of reports may result in the risk of legal action or penalties against the Company, as well as negative impacts on its image and reputation.**

Do not hesitate to raise the issue: if you do so honestly and truthfully, you help protect the Lavazza Group, the work environment and all personnel.

If you have **definite information** or **reasonable suspicion**, based on **precise and consistent factual elements**, that one of the above forms of conduct has occurred or may occur, you can report it, either **anonymously** or **providing your contact details**, with an absolute **guarantee of confidentiality and privacy** at all stages of the procedure, through one of the channels made available by the Lavazza Group.

PURPOSE OF THE POLICY



This Policy¹ aims at regulating the methods of making and handling reports of misconduct or suspected unlawful acts, carried out both from within and outside the Group, in order to **counter any form of unlawful or unethical conduct**.

The objective is not only to prevent the occurrence of a non-conformity or wrongdoing within the organisation, but also to **involve all employees and third parties** in action to combat unlawfulness through **active and responsible participation**.

The Policy governs all phases of the process, from submitting the report to its receipt by recipients and the analysis, processing and decision-making based on the report, guaranteeing the confidentiality of the whistleblower (and the person concerned by the report) and the whistleblower's safety from possible retaliation and/or discrimination resulting from the report.

*For further information on the **procedure for submitting reports**, go to **Annex 1**!*

This document aims to:

- **help create a corporate culture based on transparency and trust;**
- **remove factors that may hinder or discourage reporting**, such as doubts and uncertainties about the procedure to be followed and whistleblowers' fears of retaliation or discrimination as a result of the complaint;
- provide clear **information** about the communication channels and the subject and ways of making the reports, so that everyone knows them and can check that they are correctly applied at any time, minimising the risks of abuse.



WHAT IS MEANT BY REPORT AND WHISTLEBLOWER?

"**Report**" means any communication concerning behaviour (of any nature, including also mere omissions) and/or information that may constitute the grounds of a criminal **offence** or, in any case, **inappropriate conduct, misconduct or alleged breach** of the principles expressed in the Code of Ethics, in the Organisational Model pursuant to Legislative Decree No. 231/2001 (where applicable), in the policies and procedures, and by laws and regulations applicable to the Group.

"**Whistleblower**" means any **employee and/or collaborator** of the Lavazza Group, anyone who has business relationships with the Company (**customers, suppliers, business partners**), as well as **third parties**.



¹ The Policy complies with the principles laid down in Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law and applies in accordance with applicable local laws.

WHY SUBMIT A REPORT?



The report serves to investigate **potential unlawful and unethical conduct**, to **identify risks in a timely manner** and to prevent **damage to the Group's reputation**. In this way, reporting can help to **minimise risks for the Group, the work environment and all employees**.

Each report contributes to the **Group's success** and to the **promotion of an ethical, sound and sustainable culture**, offering an important contribution to the **internal compliance control system**.

If as an **employee or collaborator of the Lavazza Group**, a **customer, supplier, business partner** or a party who has **any other relationship with the Group**, you become aware of actions or conduct that are, or may appear to be, contrary to the Group's values, inappropriate, incorrect or unlawful or such that may put the Group, the working environment and all employees at risk,

"voice your concerns" by submitting a report!

WHEN IS THE TIME TO MAKE A REPORT?



If you are not sure how to act, **ask yourself some questions** such as, for example:

- *Could the conduct be against the rules of ethics and conduct, procedures, protocols or provisions contained in the Lavazza Organisational Model or Code of Ethics?*
- *Could the conduct constitute a breach of laws and/or regulations applicable to Lavazza?*
- *Could the conduct constitute a criminal offence (e.g., corruption, environmental offences, occupational health and safety offences)?*
- *Could Lavazza be held liable as a result of the conduct?*
- *Could the report prevent Lavazza being impacted by negative consequences?*

*If the answer is **"yes"** to any of these questions or if you are still uncertain, **do not hesitate and report it!***

If you are an employee of the Lavazza Group, remember that your Line Manager, your HR Business Partner and the Legal and Corporate Affairs Department of the Parent Company are in the best position to understand the situation and clarify any doubts.

This policy also aims to create the conditions instrumental to:

- i. guaranteeing the **confidentiality of the identity of the whistleblower and the alleged perpetrator of the breach**, without prejudice to the rules governing the initiation of investigations or legal proceedings by national authorities in relation to the facts covered by the report or, in any case, of disciplinary proceedings initiated by the Company in the event of reports made in bad faith;
- ii. **adequately protecting the whistleblower of reports made in good faith** against any form of retaliation, discrimination or penalty for reasons related, directly or indirectly, to the report;
- iii. starting the **necessary action against anyone who makes untruthful reports in bad faith**.

WHAT FEARS AND CONCERNS MAY THERE BE IN MAKING A REPORT?



The use of a reporting system often brings with it fears and prejudices in potential whistleblowers — concerns mainly related to the establishment of a **hostile climate** based on control and mutual accusations.

The reporting system adopted by the Lavazza Group is not intended to be an instrument of accusation against other people, but rather an effective **tool for protecting oneself, collaborators, the work environment and the whole community**.

At every stage of the reporting process, the **utmost confidentiality** and **personal data protection** will be ensured, in compliance with the law.

For any doubt or need for clarification regarding the reporting process, you can contact the Compliance Function of the Parent Company (HQ).

POLICY PUBLICATION



This Policy is published on the corporate Intranet and on the website www.lavazzagroup.com.

SUBJECT OF REPORTS



Reports may cover **inappropriate conduct or misconduct** and **alleged breaches**, whether established or suspicious, which may relate, by way of example, to:

- the Lavazza Group's Code of Ethics;
- the Organisational Model pursuant to Italian Legislative Decree No. 231/2001 (in the legislation where it is applicable)²;
- the Policies and procedures adopted by the Group;
- laws and regulations applicable to the Group.

WHAT ARE THE MAIN TYPE OF CONDUCT COVERED BY REPORTS?

By way of mere example and without limitation, they include:

- *corruption and fraud;*
- *embezzlement and theft;*
- *money laundering;*
- *health, safety and the environment;*
- *discrimination, harassment, mobbing and other labour rights issues;*
- *breaches of data protection and IT security regulations;*
- *breaches of tax laws;*
- *breaches of competition rights (antitrust law);*
- *disclosure of corporate secrets.*



WHAT CANNOT BE REPORTED?

Only those reports concerning **facts or information identified directly by the whistleblower** will be taken into account, **excluding complaints or claims of a "personal" nature**.

REPORTING REQUIREMENTS

Reports:

- must be made **in good faith**;
- must be **substantiated** and **based on precise and consistent factual elements**;
- must concern **facts that can be identified and known directly by the whistleblower**;
- must contain, if known, all the **information necessary** to identify the perpetrators of the potentially unlawful conduct.

It is the responsibility of the whistleblower, even one who is anonymous, to make **reports in good faith**, i.e., based on the belief that the facts stated are true (regardless of whether the facts reported are then corroborated by subsequent investigations), and in line with the spirit of this Policy: reports that are **manifestly unfounded, opportunistic and/or made for the sole purpose of damaging the person concerned by the report** or, in any event, persons covered by it, **will not be taken into consideration** and may **give rise to penalties and/or actions before the competent Judicial Authority**.

² All the reporting procedures laid down in the Organisational Model pursuant to Italian Legislative Decree No. 231/2001 in force with regard to Italian companies remain valid; the relevant provisions contained in the above-mentioned Organisational Model are not amended by this procedure.

DO YOU NEED TO IDENTIFY YOURSELF WHEN MAKING A REPORT?

The Group appreciates and encourages **open communication with whistleblowers**, who are asked to provide their name and contact details, allowing an open and transparent dialogue to be established, in which all the necessary information can be provided to enable a proper assessment of the facts under consideration.

Your name and your report, including any further information and requests, will be handled **confidentially** and will be shared with other parties only if required by applicable local laws and regulations.

In any event, you have the right to **submit the report in an anonymous format**, which will have the same value as a report containing your details.

Anonymous reports, as opposed to those in which personal details are provided, must be **detailed in greater depth** so that the facts and situations disputed are sufficient to be able to assess their validity and progress the investigation.

Bear in mind that, at any time, you can freely choose whether to reveal your identity, if you feel safer.

The Group reserves the right to request **authorisation** from the whistleblower **to disclose his/her identity** where this is essential for the initiation of disciplinary and/or judicial proceedings against the perpetrator of the reported conduct.

WHAT TO INDICATE IN THE REPORT?

If you intend to make a report, be careful to report **clearly** and **completely** all the **information useful for carrying out the checks and assessments required** to verify its **validity** and **objectivity** and, in particular, to:

- describe precisely the event covered by the report;
- indicate the person(s) held responsible for the breach(es), as well as any other parties involved and/or who can report on the event;
- describe the circumstances regarding the time and place where the event covered by the report occurred;
- attach all available documents to support the report;
- provide all information that can help reconstruct the event and establish the validity of the report.

A well-executed, substantiated and detailed report can be handled without further requests for information and involvement of the whistleblower.

HANDLING OF REPORTS

Reporting channels and submission system

The whistleblower may submit a report, whether providing his/her details or anonymously³, through the following channels (for further information on the procedure for submitting reports, please refer to **Annex 1**):



- **WHISTLEBLOWING digital platform**: cloud-based platform available 7/24, accessible via the Web from the website www.lavazzagroup.com using any device that allows to:
 - grant access to employees and direct collaborators, in addition to any person who has business relationships with the Company (clients, suppliers, business partners) and third parties;
 - upload attachments, videos and audio files.

Reports via the platform can be made in **English, Italian, French and German**;



- a dedicate **phone line**, by calling the **toll-free number 800727428** from Italy and the **toll number +3901118570015** from abroad.
Telephone reports can be made in **Italian and English**;



- sending an e-mail to the **Ethics Committee's account** (comitatoetico@lavazza.com);



- via **ordinary post** to the address Via Bologna 32 – 10152 Turin – Italy, specifying **“Lavazza Group’s Ethics Committee”** as recipient.

Regardless of the channel chosen, the report will be handled **promptly, confidentially and professionally**. For greater efficiency in the handling procedure, **it is strongly recommended that reports be submitted through the WHISTLEBLOWING digital platform**.

WHAT IS THE DIGITAL PLATFORM?

The Whistleblowing platform is a digital system that the Lavazza Group has adopted not only to comply with specific regulatory requirements, but also and above all to convey to its employees and third parties the **values of transparency, integrity and ethics** laid down in its Code of Ethics. The platform offers a certified guarantee of the **highest standards of security and data protection**: any processing of sensitive personal data will take place in full compliance with applicable regulations in force.

³ Anonymous reporting may be subject to restrictions under local laws in the whistleblower’s country.

RECIPIENTS OF REPORTS

Regardless of the reporting channels used, the reports will be handled, in the first place, by an external law firm, which is independent and autonomous and able to offer adequate confidentiality and data protection guarantees. This firm will carry out a **preliminary factual analysis, as well as an assessment**, classifying the reports as:

- **"less critical"**, i.e., reports that, based on the outcome of the screening, have less relevance;
- **"more critical"**, i.e., reports that require further investigation to confirm their relevance level and the status regarding internal admissibility.

The external law firm will manage the communication approach with the whistleblower, confirming that it has received and accepted to handle the report (**within 7 working days**).

The relevance check may require **clarifications or additional information to be requested from the whistleblower**, through the reserved personal area.

If the report is found to be **non-relevant** or **non-admissible** (for cases that are insufficiently supported by evidence, manifestly unfounded or related to conduct or facts not relevant in relation to this procedure), the procedure will be closed by the HQ Compliance Function and the whistleblower will be notified accordingly.

The reasons for the closure of the procedure will be recorded in the Register of Reports.

On the other hand, if the **report is deemed to be relevant**, the **HQ Compliance Function-Turin** will accept to handle it and will provide for a further verification of admissibility after discussion, where necessary, with the members of the Ethics Committee, as well as with the specifically competent corporate functions of the HQ or of the subsidiaries concerned by the facts being reported.

The whistleblower may be asked for clarifications or additional information at this stage as well.

WHAT IS THE ROLE OF THE COMPLIANCE FUNCTION IN HANDLING THE REPORT?



The HQ Compliance Function:

- **oversees** that the internal report handling system is **correct** and **complies with the law**, monitoring any new regulations and the introduction of new obligations for system compliance purposes;
- **coordinates the investigations** carried out following the reports and offers initial advice to the other business functions involved;
- **supports** the Ethics Committee in the handling and resolution of reports and is responsible for the completeness, integrity and closure of the case.

ACCEPTANCE AND PRELIMINARY INVESTIGATION OF RELEVANT REPORTS



The **HQ Compliance Function** is responsible for accepting the report, coordinating the investigation activities and adopting all the initiatives deemed necessary to establish whether the report is valid or not, observing the utmost **confidentiality** and applying the necessary **security measures**.

Based on the result of the initial assessment commissioned from the external law firm, the report is recorded in a dedicated **Register of Reports**, set up in electronic format, which can subsequently only be accessed by the HQ Compliance Function and the Ethics Committee.

The HQ Compliance Function coordinates the **preliminary investigation** and **processing of the report** deemed to be **relevant** and **admissible**: it liaises, where necessary, with the members of the Ethics Committee, examines the facts reported and any documents received, gathers all the necessary information and communicates with the whistleblower, where possible.



The HQ Compliance Function may, if it deems it necessary and/or appropriate for purposes of establishing the report's validity:

- contact the whistleblower, where possible, and invite him/her for a personal and confidential interview in order to receive clarifications and/or additions to the information and documents provided;
- conduct a hearing of any other persons who can report on the facts reported;
- carry out any other activity deemed appropriate for verifying the report.

When carrying out the preliminary investigation activities, the HQ Compliance Function may — after discussion, where necessary, with the members of the Ethics Committee — involve other employees, other functions of the Company and/or appoint external consultants, if necessary. Members of the corporate functions involved in the assessment of the report are subject to the same confidentiality constraints and responsibilities as the HQ Compliance Function and the Ethics Committee.

The HQ Compliance Function prepares and keeps the minutes of any meetings relating to the assessment activities conducted.

CONFLICT OF INTEREST SITUATIONS



The procedure ensures that report handling is entrusted to persons who are not in **conflict of interest** situations.

If the report concerns information about misconduct or unlawful conduct attributable to one or more of the members of the HQ Compliance Function or the Ethics Committee or the Supervisory Board (Legislative Decree No. 231/2001), the aforementioned persons are denied access to the report.

This **control mechanism**, designed to prevent reports being handled incorrectly, is guaranteed by the external law firm, which will prevent parties in a conflict of interest position being involved from the beginning.



In particular, a report about a member of the HQ Compliance Function will be addressed directly to the Parent Company's Chief Internal Audit, who will handle the report following the criteria laid down in this Policy; a report about a member of the Ethics Committee or Supervisory Board will be submitted to the Parent Company's Chief Executive Officer; if a report relates to misconduct or unlawful conduct attributable to one or more members of the Board of Directors of the Parent Company or of the management body of a Subsidiary, the Ethics Committee will handle the report, promptly notifying the Parent Company's Chief Executive Officer.

These provisions shall also apply if a conflict of interest occurs at a stage after the report is received, with the persons involved being replaced in their respective roles according to the above rules.

All conflict of interest situations must be reported without hesitation and recorded in the Register of Reports.

DECISIONS REGARDING THE REPORTS

At the end of the preliminary investigation, the HQ Compliance Function prepares a **report** on the activities carried out and on the final assessment of the case, to be shared with the Ethics Committee.

It will also enter in the Register of Reports the outcome of the assessment and any imposition of penalties against the person concerned, as well as the possible initiation of legal proceedings against him/her.



In the case of **unfounded reports**, after discussion with the Ethics Committee, the HQ Compliance Function **closes** the procedure and records the reasons in the Register of Reports.

The closure of the procedure will be communicated to the whistleblower, where possible.



In the event of **reports that are manifestly unfounded or submitted in bad faith**, made for the sole purpose of discrediting one or more persons or corporate functions or the Company or otherwise vexatious towards Company employees, the HQ Compliance Function involves the Ethics Committee and the Human Resources Department (and possibly the Board of Directors of the company concerned) to establish the necessary penalties deemed most appropriate from time to time to be imposed on the perpetrator of unfounded reports, not excluding — if the conditions are met — a **possible complaint to the competent Judicial Authority**.

On the other hand, no action or penalty is envisaged against those who report in good faith facts found to be unfounded in subsequent checks.

If, as a result of the assessment conducted, the report is **founded**, or in any case appears to be so, the HQ Compliance Function promptly notifies the **Ethics Committee** (and possibly, where necessary, other specifically competent corporate functions), which will take the necessary decisions and adopt the measures resulting from the report, including any reporting of criminal, civil and/or administrative offences to the Judicial Authority.

The Ethics Committee will carry out, through the HQ Compliance Function, all activities designed to assess the facts covered by the report, making use — where deemed necessary due to the nature and complexity of the checks and respecting the confidentiality of the situations and persons concerned by the report — both of the specialist support of corporate structures and functions of the Parent Company or the subsidiaries, and of any external consultants.

In order to ensure timeliness and effectiveness, the Ethics Committee will communicate the **decision based on the report** to the whistleblower within a **maximum period of three months and in any case as soon as possible on the basis of relevance and severity** from accepting the report, informing the whistleblower of the measures taken following the investigations carried out.

HOW IS THE ETHICS COMMITTEE COMPOSED?

The Lavazza Group Ethics Committee is a body made up of the Parent Company's following functions:

- **General Counsel & Chief Legal Officer**
- **Chief Institutional Relations & Sustainability**
- **Chief Human Resources and P&F,**



as well as the **Chairman of the Board of Directors of Luigi Lavazza S.p.A.** in the capacity as the Ethics Committee's Chairman.

HOW ARE THE REPORTS RELEVANT FOR THE PURPOSES OF LEGISLATIVE DECREE No. 231/2001 HANDLED?



If the report is relevant for the purposes of Legislative Decree No. 231/2001 (applicable in Italy), since it includes a breach of the Organisational Model or the Code of Ethics or one of the offences provided for by the said Decree, the information is sent to the **Supervisory Board** of the company concerned.

Having been informed of the report, the Supervisory Board, in compliance with the principles of confidentiality and/or anonymity of the whistleblower, will collaborate in the report's assessment and handling, will take the necessary decisions and will adopt the measures resulting from the report relevant for the purposes of Legislative Decree No. 231/2001, in accordance with the relevant procedure.

In addition to traditional channels, reports relevant for the purposes of Legislative Decree No. 231/2001 can be sent through:

- an e-mail sent to the address of the Supervisory Board of the company concerned;
- an ordinary mail, indicating the Supervisory Board of the company concerned as the recipient.

PROTECTION OF THE WHISTLEBLOWER AND THE PERSON CONCERNED BY THE REPORT

Protection of the report's confidentiality



The Lavazza Group ensures the **confidentiality of the whistleblower's identity** and the **confidentiality of the information** contained in the report throughout the case handling process and by all persons involved, within the limits set forth by applicable local legislation to protect anonymity and confidentiality.

Failure to comply with confidentiality obligations may result in **disciplinary liability** against the perpetrator of the abuse, without prejudice to the additional responsibilities provided for by law.

It is the responsibility of the HQ Compliance Function and the Ethics Committee to ensure the confidentiality of the whistleblower — as well as of any other information from which the whistleblower's identity can be deduced directly or indirectly — from the moment they undertake to handle the report, even if the report subsequently proves to be incorrect or unfounded. All those involved in handling the report are required to protect its confidentiality.

Disclosure of the identity of the whistleblower and of any other information is only permitted where this is a necessary and proportionate obligation in the context of investigations by national authorities or legal proceedings. If disclosure of the identity is necessary, the whistleblower is informed prior to such disclosure, unless this would prejudice the related investigations and legal proceedings.

Protection of the whistleblower against retaliation and/or discrimination



The Lavazza Group undertakes to protect the whistleblower reporting in good faith, and anyone who participated in the investigation, against any form of **retaliation**, **discrimination** or **penalisation** for reasons related, directly or indirectly, to the report.

HOW AM I PROTECTED IF I MAKE A REPORT?

The Lavazza Group does not tolerate any threats, retaliation and/or discrimination against the whistleblower.

Retaliation and/or discrimination mean unjustified disciplinary actions, and particularly dismissal, demotion, unjustified relocation, harassment at work and any other form of retaliation that creates uncomfortable or intolerable working conditions for the whistleblower.

Whistleblowers who believe that they have suffered retaliation and/or discrimination as a result of the complaint made can inform their direct Manager or the Human Resources Department, so that an assessment can be made of whether the circumstances exist to initiate disciplinary proceedings against the perpetrator of the retaliation and/or discrimination.

The whistleblower's protection measures apply only to those who report information of an unlawful or inappropriate activity acquired in the work environment and during their work: irregular investigative activities, aimed at collecting evidence of wrongdoing, are not authorised in any way.

Protection of the person concerned by the report



The Lavazza Group also applies the same protection measures that **ensure the confidentiality** of the whistleblower's identity to the person allegedly responsible for the conduct or breach, without prejudice to any legal obligation to communicate the name of the person concerned by the report (e.g., in response to requests from the national Judicial Authority).

The Group guarantees the persons concerned the right to be informed (within a reasonable period of time) of the allegations and any disciplinary measures against them, as well as the right of defence.

RECORD KEEPING OF REPORTS

To ensure full traceability of the assessment activities carried out, the HQ Compliance Function is required to document the reports received in the **Register of Reports**, set up in electronic format and protected by authentication credentials, accessible to the same function, the Ethics Committee and the Supervisory Board. The external law firm dealing with the first screening activity will have only partial access to the Register.

The reports, and the related documentation, are kept **in compliance with the legislation on the processing of personal data**, in a manner that ensures their integrity and completeness. Personal data that are manifestly not useful for the processing of a specific report will not be collected and stored and, if collected accidentally, will be deleted without delay.

Any personal data communicated will be kept for the period of time strictly necessary to handle the report and check its validity and, in any case, for a period **not exceeding 2 years from the reporting**, after which they will be deleted. This is without prejudice to the possible initiation of disciplinary and/or judicial proceedings in respect of which the data could be kept for the entire duration of the proceedings and for a further 10 years from their conclusion.

The Privacy Policy is published on the www.lavazzagroup.com website.



ANNEX 1 – PROCEDURE FOR SUBMITTING REPORTS

HOW CAN I MAKE A REPORT?



- Through the **WHISTLEBLOWING digital platform** accessible at the following link: [Lavazza - frontpage \(integrityline.com\)](https://www.lavazzagroup.com/integrityline.com)
- via **telephone**, calling the dedicated phone line specifically the **toll-free number 800727428** from Italy and the **toll number +3901118570015** from abroad
- via **ordinary post** writing to the address Via Bologna 32 – 10152 Turin – Italy, specifying “Lavazza Group’s Ethics Committee” as recipient.
- via **e-mail** to the account comitatoetico@lavazza.com

All operating instructions for submitting reports in relation to the channels used are set out below in greater detail.

Reports through the WHISTLEBLOWING digital platform



The WHISTLEBLOWING digital platform can be accessed through the website www.lavazzagroup.com Compliance Section by clicking on the "Whistleblowing Platform" button.

The reporting process includes the following steps:

1. the frontpage, where you can view the Privacy Policy, contains two icons: “File a report” and “Secure Inbox”: clicking on the former gives you access to the page where you can fill out the report;
2. the procedure involves **filling out a form** where you can describe the report in detail: it is mandatory to fill in the event description box, which is followed by further questions that are optional to complete, yet make the report more comprehensive. In this section you can upload attachments, video and audio files to support the report using the buttons on the top right screen;
3. categorising (optional choice) the report, or indicating whether — in the whistleblower's opinion — the event constitutes or does not constitute an offence and/or breaches the Groups’ Code of Ethics, its Organisational Model pursuant to Legislative Decree No. 231/2001 (where applicable), its policies and/or procedures;
4. after answering these questions, whistleblowers will have to choose whether to identify themselves or remain anonymous; in the first case they will have to indicate their name, telephone number and e-mail;
5. in order to submit the report, whistleblowers will have to choose a **password**: the password must be kept securely because, for reasons of confidentiality, it will not be recoverable in the event of loss;

6. once the report has been submitted, the whistleblower will receive an **alphanumeric code** confirming the report's submission. This code, together with the password, will allow access to the "*Secure Inbox*" through which it will be possible to complete the report with additional attachments, follow the report's progress and dialogue through the platform in the event of any questions.

CAN I COMMUNICATE WITH THE PARTIES TO WHOM THE REPORT IS ADDRESSED?

Yes, for this purpose you need to access the "*Secure Inbox*" using the automatically generated alphanumeric code: here you can manage the post-report dialogue phase and communicate in a secure and encrypted way with the parties responsible for handling the report, without the recipient or other persons being able to trace the report's origin.



DOES AN ANONYMOUS REPORT GIVE ME TOTAL ANONYMITY?



To ensure complete anonymity, we recommend that you submit the report via a personal device not connected to the company network.
To protect your anonymity, pay particular attention to the details contained in any documents you attach to the report!

If whistleblowers have communicated their identification data, they will receive an alert via e-mail regarding each update of the report's status, which can be known by accessing the platform using the alphanumeric code and password. In the case of anonymous reporting, it will be the responsibility of the whistleblower to log in periodically with the code and password to check the report's progress.

Reports through the dedicated telephone line



Users can also submit a report via a dedicated telephone line by calling the **toll-free number 800727428** from Italy and the **toll number +390118570015** from abroad. Via telephone line, it will be possible to make a report in **Italian** and **English**.

Making the report is simple: you just have to follow the recorded voice.

You will be asked to enter a five-digit company code. **Lavazza's code is: 65687.**

Whistleblowers can register a report and decide whether to leave their contacts (report with personal details) or otherwise not reveal their identity (anonymous report).

In any case, it will be the responsibility of the whistleblower to periodically access the telephone line with the six-digit code they will receive to check the report's progress, supplement it, or answer any questions.

HOW IS MY ANONYMITY PROTECTED WHEN USING THE TELEPHONE LINE?

You can make a report anonymously, without leaving your personal data, also using the telephone line as a way of making a report.

All communications will be managed through the six-digit code that is assigned at the first access. To protect your anonymity, pay particular attention to the details you choose to share when you register your report!

Reports made by sending e-mails to the e-mail box of the Ethics Committee

Reports can also be sent to the following e-mail address: comitatoetico@lavazza.com. To ensure privacy and confidentiality, access to this mailbox is reserved for members of the Ethics Committee and the HQ Compliance Function.

The HQ Compliance Function will ensure that the case is accepted and handled according to the principles set out in this Whistleblowing Policy.

Reports by ordinary post



Reports may be sent via ordinary post to the address Via Bologna 32 – 10152 Turin – Italy, specifying “Lavazza Group Ethics Committee” as recipient.

The HQ Compliance Function will ensure that the case is accepted and handled according to the principles set out in this Whistleblowing Policy.