

## SPEAK-UP STATEMENT

Dear colleagues,

The Bolzoni Group is committed to conducting its business according to high ethical and legal standards, requiring all of those who do business with Bolzoni to keep an upright and virtuous behavior in order not to commit wrongdoings and respect all the fundamental rights of people – as outlined in the various company policies, as well as in the Bolzoni Group's Code of Ethics and the Hyster-Yale Code of Corporate Conduct.

The recent *EU Directive 2019/1937*, introduced the new whistleblowing regulations, **which provide rules and guidance for the adoption of dedicated channels for reporting unlawful wrongdoings.**

### **Purpose of reporting**

The purpose of this document is to inform colleagues and third parties of the **adoption by Bolzoni of a whistleblowing policy ("Speak-Up Policy") and the consequent implementation of anonymous and confidential internal channels, to be used to submit any reports of unlawful wrongdoings within the workplace.**

Among others, offenses may include:

- **criminal activities** (fraud, sexual and moral harassment, etc.);
- **health and safety hazards** (outside to the normal reports to the supervisors and the H&S Manager);
- **damage to the environment;**
- **failure to comply with any requirement of applicable law;**
- **corruption and boycott events;**
- **financial crimes;**

### **Procedure for submitting reports**

There are three ways to file a whistleblowing report:

1) **Written**

by connecting to the website **Alertline** ;

2) **Oral**

by **calling toll-free number** of the country in which you are located (attached in Annex I);

3) **Requesting a meeting**

request a meeting with the Company contact person via

**(i) toll-free number** of your country; or

**(ii) To the site Alertline** providing all the necessary data to be contacted by the contact person who will organize a meeting in a reasonable time.

During the submission of the report, please describe the event as much as possible in order to allow a correct and rapid management of the report.

Best regards

Bolzoni Group

# SPEAK UP POLICY

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### Attachments:

#### **STATEMENT OF SPEAK UP (IN PREFACE)**

#### **1 - TOLL-FREE LOCAL NUMBERS**

#### **2 - PROTECTION OF PERSONAL DATA**

## 1. INTRODUCTION

Bolzoni S.p.A. ("**Company**") is a historic industrial company that operates all over the world, also through its subsidiaries or affiliates, in the production and marketing of forklift equipment and industrial handling solutions.

Compliance with laws and regulations, in conjunction with the principles of loyalty, diligence and fairness expressed in our company and throughout the Hyster-Yale Group, including through the HY Code of Corporate Conduct and the Bolzoni Code of Ethics, are essential prerogatives for the conduct of all the Company's activities, which have always been distinguished by the maintenance of responsible conduct towards the community and the environment.

In order to set up an internal channel for reporting wrongdoings, pursuant to Directive (EU) 2019/1937, which introduces the new regulations on *whistleblowing* reports, the Company has prepared this *Speak-Up Policy* ("**Policy**").

This Policy is also intended for all the Company's subsidiaries as intended pursuant to Article 2359 of the Italian Civil Code, it is understood that in order to comply with each local jurisdiction, any supplementary or amending acts that may be necessary to adapt certain contents to the mandatory laws in force in the various jurisdictions will be adopted.

The Policy aims to support and inform about the possibility and methodology for reporting unlawful conduct, without the fear of possible retaliation: this document will examine in depth the measures adopted for the preparation and management of the reporting channel and any applicable corrective and protection measures.

## 2. PURPOSE OF THE POLICY

The integrity and reputation of the Company are based on the conduct of all of those who work and/or collaborate with the Company in any way. Anyone who observes and testifies to the perpetration of unlawful conduct or conduct that appears to violate the law, is encouraged to "**Speak-Up**", i.e. to file a report: failing to report possible unlawful behavior can worsen an existing situation, making any subsequent investigations and corrective actions more difficult.

By means of this Policy, the Company also wishes to confirm that any reporting person, as well as any facilitator of the latter to Speak Up, will not suffer retaliation for proceeding to submit such report, in good faith, on suspected wrongdoing.

### 2.1. Who can Speak Up?

The safeguards and tools provided in this Policy are available to anyone (employees or any other third party, such as but not limited to suppliers, customers, consultants, contractors, agents, etc.) who wishes to report possible unlawful conduct ("**Reporter**") taking place within our Company. These means are also made available to all those who assist a reporting person in the reporting

process, operating within the same work context and whose assistance will be kept confidential ("**Facilitator**")

## 2.2. What violations can be reported?

The Speak Up procedure described herein may be used by anyone to raise concerns about wrongdoing within the Company's business environment ("**Events**").

Examples of wrongdoing that can be reported using Speak Up's internal channels are:

- criminal activities (fraud, sexual and moral harassment, etc.);
- Human rights violations;
- Health and safety hazards due to non-compliance with current regulations;
- Environmental damage;
- Corruption, bribery and boycott events;
- Financial crimes;
- Failure to comply with any requirements of applicable regulations.

**THE REPORTING CHANNELS IN THIS POLICY SHOULD NOT BE USED TO REPORT PERSONAL DISAGREEMENTS OR IMMEDIATE THREATS TO LIFE OR PROPERTY. IF YOU NEED EMERGENCY ASSISTANCE, PLEASE CONTACT YOUR LOCAL AUTHORITIES OR CALL THE EMERGENCY TELEPHONE NUMBER IN YOUR COUNTRY.**

## 2.3. Why Speaking Up?

Submitting reports of wrongdoing is never easy, however, the Company wants to sponsor and educate anyone who comes into contact with our Company to a sense of personal responsibility, inviting you to Speak Up whenever you are a witness of wrongdoing and thus "raising your hand" may be the correct action to take.

## 3. INTERNAL SPEAK UP PROCEDURE

### 3.1. How to Speak Up?

The Company has set up an effective, anonymous and strictly confidential internal channel to submit whistleblowing reports of unlawful Events ("**Reports**"). Reports can be made anonymously as well as by providing your own information: it will be the Company's responsibility to maintain confidentiality on the information provided and on any ongoing investigations.

The company's internal whistleblowing channel ("**Alertline**") operates 24 hours a day, seven days a week, and is operated by an independent third party. The Alertline is designed to protect the confidentiality of information and, where required, anonymity (in accordance with current legislation). The Report will then be forwarded and managed by the Company's whistleblowing contact person ("**Contact Person**").

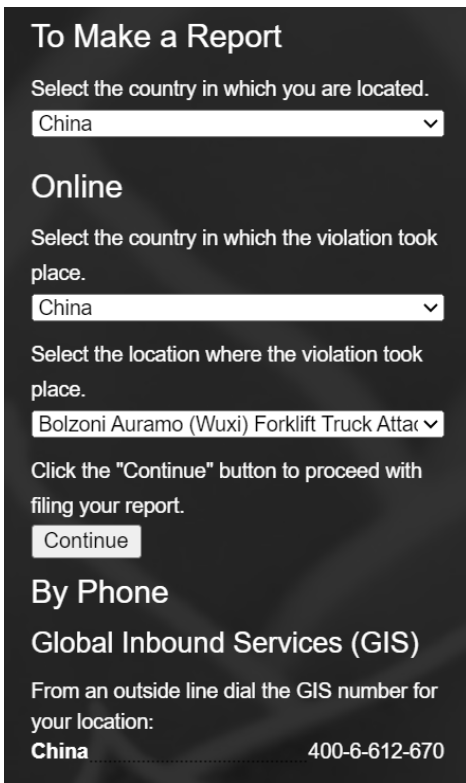
How to submit Reports via Alertline?

- **BY TELEPHONE**

you can submit your Reports through the Alertline channel via a free call by dialing the number of your country. Please refer to **Appendix 1** to find the reference number of the country from which you wish to submit your report;

- **ONLINE**

you can submit Reports online by connecting to the [Alertline](#) website.



To submit a Report, please enter **1)** the country in which you are located; **2)** the country in which the offence occurred; **3)** the place/company where the offence occurred; **4)** Click on *Continue* to continue with the report, detailing the event as much as possible.

After completing the Report (by phone or online), you will receive a univocal code called "**Report Key**". You can use this Report Key to call up or access the [Alertline](#) site to check the progress of the Report, as well as check if the Contact Person provided a feedback about the ongoing process, or if are needed further questions thus to learn more about the reported Event or if you want to provide further information about the Event. **The Report Key is particularly important if you choose to remain anonymous, as in that case the Contact Person will be only be able to contact you through the website.**

- **MEETING REQUEST**

The Reporter may request a meeting with the Contact Person through the above channels or by contacting his/her direct manager, human resources or legal department with the clear request to contact the Contact Person to submit a Report. It will be care of the Contact Person to contact you and organize a meeting within a reasonable timeframe: **it is understood that in order benefit from all the protections guaranteed by Directive (EU) 2019/1937 the Reporter must specify at the time of reporting to the manager that it is a Whistleblowing Report.**

### 3.2. What kind of information do I need to provide?

A Report may only be properly investigated if it contains sufficiently detailed information to proceed with a more thorough investigation. When submitting a Report (whether at a meeting,

online or by phone), please provide every detailed information necessary to enable the Company to assess and investigate the Event, such as:

- ✓ the circumstances, developments and occurrences that led to the Event;
- ✓ Names, dates, locations and other information relevant to the Event;
- ✓ Any documentation that may support the Report.

### 3.3. Incomplete reports

The Company encourages you to Speak Up as soon as possible, ideally before the Events get out of hand or irreparable damage is committed. This Policy has been designed to be able to listen to all Reports: it is not necessary to have all the answers nor at least it is necessary to prove that the Report is correct. Through the Contact Person, the Company will take care of investigating the reported Events, thoroughly examining each Report in order to determine the right steps to be taken for the protection of the communities and the Company itself. You are strongly advised not to investigate the Events on your own, nor to seek evidence in order to construct a more truthful Report.

### 3.4. Feedback and Follow-up to Reports

Within 7 days from the submission of a Report, the Company will send to the Reporter a confirmation of receipt of such Report to the Contact person ("**Follow-up**"). The Report will then be carefully examined in order to possibly investigate the reported Events in the most correct way. Further feedback on the progress of the investigation will be available to the Reporter within 3 months from the time of submission of the Report ("**Feedback**"). Further periodic feedback may however be provided by the Company to the Reporter in order to ensure a correct and transparent management of the Report: please note that the Company may not be able to provide full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy or to protect the rights of all data subjects.

### 3.5. Investigations

Depending on the nature and severity of the Events presented in the Report, the Contact Person will take care to adopt the most appropriate investigation methods: if specialist advice is required to respond to the Report, the Company may also make use of third-party service providers to provide the best assistance in the investigation.

The Company invites you to cooperate as much as possible with the Contact Person and with those who carry out the investigations, answering any questions in a complete and honest way: obstructing investigations, especially investigations by law authorities, can lead to a worsening of

the situation with potential legal implications for all those who obstruct the work of police forces and public authorities.

The data collected during the Report and during the investigation will be kept strictly confidential and will be disclosed only for legal obligations to public authorities or in other circumstances, only with the consent of the person involved: during the investigation, in the event that you find yourself answering questions about the Event under investigation, you are advised to maintain the strictest confidentiality on any information.

**You may not influence the investigation by seeking to persuade or support a particular point of view, and you may not alter, destroy or remove any evidence relating to the Events presented in the Report that may be deemed relevant to the resolution of the case.**

### **3.6. Concerns about Internal Whistleblowing Management**

#### *3.6.1 External Reporting*

If you believe that the Report submitted has not been handled appropriately by the Company or that an investigation has not been carried out correctly, please proceed to make an "**External Report**" through the public channels made available by the authority (please contact the Company's Contact/Legal Department for all information to contact the local authority that manages the External Report).

#### *3.6.2 Public Reporting*

If it is deemed that an Internal Report or an External Report has not been properly handled, the Reporter has the option of making a public disclosure, whether anonymous or not, about the Events ("**Public Report**"). Any person who, after having *i*) made an Internal Report and *ii*) an External Report, *iii*) reasonable grounds to believe that the Event may constitute an imminent or obvious danger to the public interest, or *iv*) reasonable grounds to believe that the External Reporting may lead to the risk of retaliation, may proceed with a Public Report, maintaining the protections granted by current legislation.

## **4. RETALIATION PROTECTION**

### **4.1. What is meant by Retaliation?**

Retaliation means any conduct, act or omission, even if only attempted or threatened, carried out by reason of the Report (internal or external or public or to judicial/accounting authorities) that causes or may cause the Reporter (or the person who filed the complaint) directly or indirectly, unjust damage ("**Retaliation**").

Please note that the Company's Alertline can be used to file Reports about any type of Retaliation.

### **4.2. Conditions for the protection of the Reporters**

The safeguards apply to the Reporters (and Facilitators) if:



- i)* at the time of the Report or complaint to the judicial or accounting authority or the Public Report, the Reporters or complainant had reasonable grounds to believe that the information on the reported Events was true and relevant to this Policy;
- ii)* the Public Report was made on the basis of the provisions of point 3.6.2. of this Policy;

Any form of threat or Retaliation will not be tolerated and will be treated as a violation of Bolzoni's Code of Ethics and Hyster-Yale's Code of Corporate Conduct, which may lead to disciplinary consequences.

#### **4.3. Misuse of the Speak Up Policy**

Misuse of this Policy is also considered a clear violation of the Bolzoni Code of Ethics and the Hyster-Yale Code of Corporate Conduct. Any Reports that do not comply with this Policy will not benefit from the Retaliation protections listed in this chapter 4.

### **5. PRIVACY AND CONFIDENTIALITY**

#### **5.1. Confidentiality**

All Reports are treated as strictly confidential. This means that all personal data about the reported Events will be shared only with the Contact Person and, subject to the consent of the Reporter, with a limited number of people based on the strict need to retrieve information necessary for the proper management of the investigation. Confidential information obtained through Reports or from the conduct of investigations may only be disclosed with the consent of the persons involved or upon request from a public authority or as required by law.

The Company is committed to protecting the privacy of all persons involved, safeguarding personal data: all personal data obtained within the framework of the procedures set out in this Speak Up Policy will only be used for the purposes illustrated in this Policy. More details on the protection of personal data can be found in **Appendix 2**.

### **6. LEARN MORE**

Requests for interpretation of the provisions of this Policy should be directed to the Company's Human Resources Department as well as to the Company's Legal Department. Please note that individual locations may adopt more restrictive local rules than those set forth in this Policy, as required by applicable law.

#### **Contacts:**

- To the Company's Human Resources Department;
- To the Company's Legal Department;

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- To the Speak Up Policy Representative of the Company by contacting [legal@bolzonigroup.com](mailto:legal@bolzonigroup.com)

**Annex 1****Toll-free local numbers**Instructions for reaching Alertline by phone

<b>Country</b>	<b>Telephone number</b>
Australia	1800-519-460
Brazil	0800-891-4386
Canada	1-800-514-6268
China	400-6-612-670
Czech Republic	800-144-305
Finland	0800-9-12761
France	0800-99-0011 / 0800-91-3674
Germany	0800-1821023
India	000 800-919-1268
Italy	800-897 501
Japan	0800-123-7073
Malaysia	1-800-81-2710
Mexico	800-681 9294
Netherlands	0800-3131100 / 0800-022-5971
Filipino	1800-1 322 0358
Poland	800-005014
Portugal	800 181 413
Russia	8 (800) 301 8352
South Africa	080 098 1144
Singapore	800-110-2391
Spain	900 876 152
Sweden	020 12 7297
Taiwan	Phone 0080 1-49-1657
United Kingdom	0800-249-4571
United States	1-800-514-6268

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**Annex 2**

**PROTECTION OF PERSONAL DATA**

The Company collects, uses and shares the personal data collected in the Reports for the purposes of this Speak Up Policy: this includes all personal data relating to the Reporters, as well as personal data relating to anyone involved in the Report or the reported Event.

For more information on how the Company handles your personal data, please see our Privacy Policy available at the [Bolzoni Privacy Policy](#).

The Company manages the Whistleblowing service through the Group portal called Alertline. The framework agreement, concerning the technical aspects of the portal, is signed by the lead company Hyster-Yale Materials Handling Inc. with the developer of the platform, Navex Global Inc. This agreement qualifies the Navex company as an external responsible for maintenance/development/assistance activities on the platform and extends ownership of the management of the data entered by reporting parties to all companies of the HY Group. The following table summarizes the roles of those involved in handling reports.

SOCIETY	ROLE	ACTIVITIES
Navex	Data processor	<ul style="list-style-type: none"> <li>Maintenance, development, assistance activities on the Alertline platform</li> <li>Sorting requests orally to the dedicated toll-free number</li> </ul>
Hyster-Yale Materials Handling Inc.	Data controller	<ul style="list-style-type: none"> <li>Signing of the framework agreement</li> <li>Sorting and support on reports (through group legal department)</li> </ul>
Bolzoni S.p.A.	Data controller	<ul style="list-style-type: none"> <li>Receipt of reports, through a person specifically qualified as a "Contact Person" (usually Legal office staff)</li> <li>In-depth investigation and feedback to the whistleblower</li> </ul>

**Legal basis**

The legal basis for the processing is to be found in the fulfilment of the regulatory obligations provided for by Legislative Decree 24/2023 (GDPR, Art.6.1(c)), as well as in the legitimate interest of managing all aspects related to any in-depth investigation (GDPR, Art.6(1f)).

**Personal data**

The Company may collect Personal Information for the purpose of investigating the Speak Up Reports it receives. Personal information may also be used as evidence of an individual's wrongdoing or to determine what actions may be required (such as disciplinary action).

The Company collects only the personal information that it deems necessary to verify the Events that are reported. The management and investigation of a Speak Up Report may include the collection and processing of Personal Information, including, but not limited to, the name and other contact details of the Reporters (in the case of non-anonymous Reports); the names of the persons you may report; and the description and any circumstances of the reported Events.

The Company will take reasonable steps to collect relevant, accurate, complete, current, and reliable Speak Up data for its intended use. The Contacts in charge of processing the Reports and/or investigating the facts must rely on objective data that have a direct link to the reported Event and limit the collection of personal data necessary to verify the reported Events.

Although the Company and Navex do not actively seek to collect sensitive personal data, as defined by privacy regulations, sensitive personal data may be included in a Speak Up Report.

Where the Reporter provides a name and other personal contact details, the identity will be strictly confidential and will not be disclosed unless consent is given. The only exceptions to this obligation of confidentiality are those in which the Company is legally required to disclose sensitive data collected by law or at the request of public authorities.

Please note that Speak Up Reports may be collected through any means of data processing, electronic or otherwise. Please note that personal data will in any case be processed separately from other employee information systems or employee files, in such a way as to ensure maximum confidentiality.

### **Purpose of data processing**

The Company processes all data collected in relation to this Policy in order to properly manage the Alertline platform and in order to follow up on the Reports received through it in order to proceed correctly with subsequent investigations and also to take any follow-up actions necessary at the end of the procedure. The Company may also use the data to create anonymous reports on the management of the company.

### **Data Retention**

The Company will not retain Speak Up data for longer than is necessary to fulfill the purposes for which it was collected and otherwise in accordance with applicable laws.

All Reports, including personal information associated with such Speak Up report, that are unsubstantiated or outside the scope of this Policy will be deleted in accordance with applicable laws or archived without delay in accordance with the Company's Retention Policy.

Personal data relating to Reports falling within the scope of the Speak Up Policy will only be retained for the period necessary for the purposes of the Speak Up Policy, and in any case to the

extent necessary to comply with applicable legal requirements. The recording of any disciplinary action against an employee arising from a Report shall be made in accordance with the Company's internal procedures, in relation to personnel records.

All Reports, including all relevant personal information associated with such Report, that are reviewed, are retained for as long as the investigation is ongoing and unless otherwise required under established applicable laws. Reports will not be kept for longer than is necessary and permitted by applicable laws (in accordance with Legislative Decree 24/20023, in Italy, no longer than 5 years from the closure of the report).

After the closure of an investigation and any subsequent disciplinary or judicial proceedings, all Speak Up data collected will be stored in a separate database with limited access for the timeframe required by local legislation. This data will be strictly accessible only to authorized individuals in order to defend the interests of the Company or if access to such data is required by a third party (e.g., courts, judges, public authorities) or by legal obligations.

#### **Data transfer**

Reports made through Alertline are received on behalf of the Company and shared with Navex. Navex is headquartered in the United States with servers located in various EU member states. The Company has reviewed Navex's policies and security to determine that the data collected by Navex is adequately protected and processed only for the purposes authorized by this Speak Up Policy and in accordance with applicable regulations.

Where Speak Up data is to be shared with a Hyster-Yale Group or Company entity located outside the country of origin for the purposes of the investigation, the Company will take all appropriate steps to apply the same level of protection to the transferred data as described in the Policy, in accordance with applicable laws.

#### **Speak Up Data Security and Confidentiality**

The Company takes appropriate administrative, technical, organizational and physical measures to protect the data collected through Speak Up Reports and protects it from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, misuse and any other unlawful use.

#### **Exercisable rights**

Individuals may have the right to access, erasure of their personal information provided to them, or request that their data be rectified in accordance with applicable laws.

The identity of the Reporter, in the event that an anonymous Report has not been submitted, will remain confidential and will not be disclosed to the accused individuals unless otherwise required by law or authorized by the Reporter itself.

#### **Contacts**

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If you have any further questions about data processing, and if you wish to exercise any of the above rights, please contact the Legal Department or direct your questions to the Company's DPO [g.galli@galldataservice.com](mailto:g.galli@galldataservice.com) or to the email [privacy@bolzonigroup.com](mailto:privacy@bolzonigroup.com)