

## ITALY

This country-specific appendix is an integral part of Bridgestone's Speak Up Policy and describes the local procedures under national law for the reporting of Local Concerns in Italy. The Speak Up Policy (including the protection from Retaliation) applies in full to the reporting under local procedures. In case of discrepancy, the rules set forth below shall prevail. Any capitalized terms not specifically defined in this sheet refer to the definitions in the Policy.

In addition to the definition provided in Appendix 2 to the Speak Up Policy, the term "Local Concerns" under Italian law includes **(i)** any breach of EU law which violates or undermines the purpose or application of the topics listed as Local Concern in Appendix 2 and **(ii)** any act or omission of public interest which involves (a) a (risk of) violation of statutory regulations or internal company rules containing a concrete obligation and having been established by the company pursuant to a statutory regulation; (b) unlawful conduct under the Italian 231/2001 legislative decree or infringements of the Company's 231 model; (c) any improper conduct or failure to act resulting in danger to public health, to the safety of persons, to the environment, or to the proper functioning of a public service body or a company; or (d) any breaches that do not merely affect personal interests and have either a pattern or structural character, or are serious or extensive, as a result of which the public interest is at stake.

### 1. Internal Reporting

Pursuant to applicable laws, Bridgestone has set up a local reporting channel in the following Italian legal entities:

- Bridgestone Italia Manufacturing SpA
- Bridgestone Europe NV/SA (Sales Division – Vimercate)
- Bridgestone Europe NV/SA (TCE – Rome)

Reporters can submit their Local Concerns using the local reporting channel on the BridgeLine (bridgestone-integrityline.org), **in writing or orally** (via the BridgeLine's phone messaging system). The Reporter can request, in writing or orally through the BridgeLine, a meeting with the Speak Up Officer within 7 calendar days of the submission of the request. Local Concerns that are reported orally directly through BridgeLine's phone messaging system shall be documented through the recording of the message in a secure, durable and accessible format. Local Concerns that are reported orally during a meeting with the local Speak Up Officer shall instead be documented, with the consent of the Reporter, through a transcript. The Reporter shall have the opportunity to review the minutes and request amendments, if necessary.

The Speak Up Officer shall, within 7 calendar days from the receipt of the Local Concern, (i) confirm receipt and (ii) provide to the Reporter, in a clear and accessible manner, information about the admissibility of the report and the procedure that will be followed. Where the Concern relates to unlawful conduct under the Italian 231/2001 legislative decree or infringements of the Company's 231 model, the Speak Up Officer shall further liaise with the competent supervisory body (*Organismo di Vigilanza*) for the handling of the Concern. The *Organismo di Vigilanza* is duly appointed to process the personal data obtained through the reported Concern (as well as any personal data gathered during any subsequent investigation), on the terms of applicable data protection laws.

Following the investigation, and within a reasonable period that shall not exceed 3 months from the date of confirmation that the Local Concern was received, the appointed Investigator shall provide to the Reporter (i) information on the outcome of the investigation (i.e., whether the Local Concern was found to be substantiated) and, to the extent applicable, (ii) an overview of the corrective actions defined, and the grounds for such actions.

A register of the Local Concerns received is maintained in the BridgeLine. Further requirements regarding the register and the data included in it may be defined by applicable laws in the future. This register (including the contents of the Concerns and investigation) shall be kept for at least five years from the receipt of the Local Concern and, regardless of such period,

during any pending judicial or administrative proceedings relating to the reports. The details of the Local Concerns shall be destroyed if they are no longer necessary to meet the requirements of applicable laws.

## **2. External Reporting**

Reporters are always encouraged to report their Concerns internally first. Bridgestone is committed to address any reported Concerns and believes this can be done more effectively internally. However, if **(i)** you have exhausted all internal procedures and the Local Concern was not addressed, **(ii)** you have reasonable grounds to believe that, if you reported internally, your Local Concern would not be followed up on or you might be subject to Retaliation, or **(iii)** you have reasonable grounds to believe that the Local Concern may constitute an imminent or manifest danger to the public interest, external reporting remains possible. In these cases, if you decide to report externally, you will be protected from Retaliation.

The Italian laws identify ANAC (Autorità Nazionale Anti-Corruzione) as the competent authority to receive and investigate external reports. If the violation concerns a crime or administrative offence, external reports can always be submitted through the external reporting channels of the Public Prosecution Office or the criminal police bodies, for criminal offences, and the competent administrative authorities or the police and supervisory authorities for administrative offences.

External Reports may be submitted in writing and/or verbally, also anonymously. Both identified and anonymous Reporters (identifiable or identified at a later stage) shall be fully protected from Retaliation under the applicable laws.