

WHISTLEBLOWER CHANNEL

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WHISTLEBLOWER CHANNEL

1. Mission

WALKING WITH PURPOSE

Delighting people with a playful, sustainable, and responsible walking experience

2. CAMPER Values

Real

We have been shoemakers for over 140 years. Quality and craftsmanship remain at the heart of what we do.

Imaginative

Camper thinks differently. And we want to be seen to be different. But not in a loud, showy way. We will add a twist of understated imagination to everything we do – in product, retail and communication.

Playful

Camper is from the Mediterranean. We are serious about what we do but do not take ourselves too seriously. We walk, we don't run. And we will always try to add a smile to life.

Caring

Camper is about people with local values and global horizons. We will do the right thing for the people and the environment wherever we work.

3. Purpose and Scope

This Whistleblowing Channel provides the appropriate mechanism for any of its stakeholders – employees, administrators, suppliers, providers, clients, customers, public administration, partners and other collaborators– to alert Camper on a confidential basis of any conduct, malpractice, that may attempt or go against the terms of the Code of Conduct and the Internal Regulations of our company.

Its scope of application is for all Camper employees regardless of the geographical area in which they operate.

4. Commitments

Camper requires that all persons or entities with whom it maintains a direct labour, commercial or professional relationship, carry out their activities in accordance with current regulations and internal regulations, particularly, its Code of Conduct and Ethics.

Camper does not allow any kind of reprisals against staff members who have reported a violation, or possible violation, in good faith, and guarantees to keep confidentiality and prevents any disciplinary action against the staff who have reported such violation, as long as the essence of each of the principles on which this policy is based is strictly respected.

5. Context

If the employee or any other stakeholder observes or suspects any breaches of the Code of Conduct and Ethics, or any law, or internal or external regulation by anyone at Camper, he/she should report them immediately.

The reports should be made sincerely and with integrity.

You may make your report if you observe or have suspicions on any of the following, including, as way of example, but not limited to:

- Breaches or violations of the Code of Conduct and Ethics;
- Breaches or violations of any policies;
- Breaches or violations of legislation or the Regulatory Body -Corruption and Bribery, Fraud, Money Laundering, Financing of Terrorist Acts, Tax Strategy Policy-;
- Conflicts of interest, behaviour with clients and labour relations.

Camper makes available to stakeholders a reporting channel tool managed by a third party, available at <https://report.whistleb.com/en/camper> that guarantees the confidentiality of the report unless the employee expressly provides the data contact and authorize its use, or that is essential to continue with the complaint process.

6. Investigation process

6.1 Whistleblowing team

Access to messages received through our whistleblowing channel is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged, and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound to confidentiality.

If an employee raises a concern directly to a supervisor, manager or by contacting the whistleblowing team in person the message is treated according to these guidelines.

6.2 Receiving a message

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken - please see point 6.3 Investigation below.

The whistleblowing team may decline to accept a message if:

- the alleged conduct is not reportable conduct under these Whistleblowing guidelines
- the message has not been made in good faith or is malicious
- there is insufficient information to allow for further investigation
- the subject of the message has already been solved

If a message includes issues not covered by the scope of these Whistleblowing guidelines, the whistleblowing team should take appropriate actions to get the issue solved.

The whistleblowing team will send appropriate feedback within 3 (or maximum 6 months) upon the date of receiving the report.

No sensitive personal information about anybody mentioned in the message will be included, if it is not necessary for describing the concern.

6.3 Investigation

All messages are treated seriously and in accordance with these Whistleblowing guidelines.

- No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.
- A message will not be investigated by anyone who may be involved with or connected to the misgiving.
- The whistleblowing team decides if and how a whistleblowing message should be escalated.
- Whistleblowing messages are handled confidentially by the parties involved.

6.4 Whistleblower protection in the case of non-anonymous whistleblowing

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of losing their job or suffering any form sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a non-anonymous whistleblower will be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offences, the whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

6.5. Processing of personal data

This whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, in order to investigate facts on the declared misdeeds and inappropriate behaviour eligible under our code of conduct or internal rules. This processing is based on the legitimate interest to prevent reputational risks and to promote an ethical business activity. The provided description and facts under this processing are only reserved to the competent and authorized persons who handles this information confidentially. You may exercise your rights of access, of rectification and of

opposition, as well as of limited processing of your personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

6.6. Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws.

Data will be permanently deleted for two years after the investigation has been completed. The documentation of the investigation and the messages of the complainant that are archived must be confidential and anonymous, as established by the GDPR. They should not include any personal information that serves to directly or indirectly identify the individuals involved in the case.

7. Data Protection

The appropriate data protection legislation will be applied to the rights of the persons whom the reports concern. The interested parties have the right to access the information on them and demand that any information that is incorrect, deficient or outdated be corrected.

All personal data contained in the reports will be removed once they are no longer needed for investigation and implementation purposes except for those records that may be required by the Administration within the deadlines it establishes.

8. Governance

The Whistleblower Channel is governed by the Compliance Committee and will be reviewed and updated regularly.

The Compliance Committee undertakes to carry out the necessary activities to ensure the correct implementation of the Policy and its measurement.

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