

REPORT PROCEDURE Executive Summary

Brembo has set up information channels in order to ensure communications of irregularities or violations of the Code of Ethics, of the Organization, Management and Control Model of Brembo S.p.A. (hereafter referred to as Model) under the D. Lgs. 231/01¹ and possible anomalies or weaknesses in the Company Internal Control System.²

In order to ensure an adequate receipt, analysis and processing of the reports, in the year 2007 the first release of the Report Procedure has been issued.

In the year 2010, this procedure has been reviewed with the aim to simplify its content and make clearer the internal competences in processing the reports.

In the previous update (2014) some improvements, in particular:

- The updating of definitions, and in particular the introduction of the Antibribery Code;
- The management of anonymous reports;
- The review of the management of whistleblowing reports after the appointment of the new Supervisory Committee;

This revision (2018) takes on updating related to Privacy notice on personal data processing (ART.13 REG UE 2016/679).

The content of the procedure hasn't been substantially changed about the following themes.

Principles of reference

- Guarantee of anonymity
- Bad faith reports preservation

Communication channels

Reports can be received through the following channels:

- Oral reports to the Supervisory Committee or the Internal Audit Department
- Ordinary post (Supervisory Committee C/O Internal Audit – Brembo S.p.A. v.le Europa, 2 24040 Stezzano-BG Italy)
- E-mail (organismo_vigilanza@brembo.it; internal_audit@brembo.it).
- Voice mail (+39 035-6055295)
- Internet (Corporate Governance section of the website <http://www.brembo.com/en/investors/Corporate-Governance/Pages/Segnalazioni-Organismo-di-vigilanza.aspx>) with the possibility also to use a specific form
- Facsimile transmission (+39 035-6055203)
- Brembo Portal (just for Brembo employees)

Reporting and reported parties

Any and all the employees, members of corporate organs (Board of Directors, Board of Auditors) and of the independent auditors of Brembo S.p.A. and its affiliate companies, as well as other third parties (customers, suppliers, consultants, collaborators, partners) maintaining business relations with Brembo S.p.A. and/or its affiliate companies.

Investigative phases

1. Recording of the report
2. Preliminary check and assessment
3. Audit
4. Follow – up
5. Reporting

For any further information or explanations: organismo_vigilanza@brembo.it

¹See D. Lgs. 8 giugno 2001, n. 231 "Discipline of the Administrative responsibility of Legal Persons"

² See Code of Ethics, Organization, Management and Control Model of Brembo and Corporate Governance Manual <http://www.brembo.com/en/investors/Corporate-Governance/Pages/Principi-e-codici.aspx>