

Samsonite International S.A.

Global Whistleblower Policy

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1. Introduction

Why do we need a whistleblower policy?

- 1.1 At Samsonite International S.A. (“Samsonite” or the “Company” and, together with all of Samsonite’s affiliated companies, the “Group”), we believe that the true measure of success is not just the results we achieve, but how we achieve them. At Samsonite, we are committed to conducting our affairs with integrity and to maintaining the highest standard of ethical behavior in all our dealings. A crucially important element of this is our commitment to an open culture where employees and other stakeholders feel secure in raising concerns.
- 1.2 Samsonite encourages you to speak up when you know or suspect that there has been or there may imminently be a breach of applicable law or regulation, Samsonite’s Code of Conduct or other Group policies, when you know or suspect that there has been or may be conduct that might compromise Samsonite’s or the Group’s reputation or the interests of its clients, or that is otherwise improper or unethical.
- 1.3 It may seem easier to keep silent or look the other way, but by speaking up, you could provide Samsonite and the Group with otherwise hidden information about illegal or unethical behavior that may introduce significant risks to the Group, and which may threaten the culture of compliance that we are all working hard to maintain. It is therefore important that we know about these issues as soon as possible. Reporting does not necessarily have to involve wrongdoing by a specific individual or individuals, but can entail raising concerns about a practice or procedure that you feel is inappropriate or that is causing risk because it is not working as intended. We all have responsibilities to protect the Group from these risks.
- 1.4 In order to enable and empower our Personnel to report their concerns in a safe and reliable way, Samsonite has implemented this policy, which outlines the Group’s procedures for receiving, assessing and investigating reports. Subject to applicable law and regulation, Personnel can submit reports confidentially, and if they wish, anonymously. It is very important to Samsonite that Personnel who make reports or who are involved or participate in an investigation under the Policy know that they will be free from any retaliation or victimization as a result of their involvement in that process.

Who is covered?

- 1.5 This policy applies to all directors, officers, employees, trainees, apprentices and any agency or contingent workers employed or engaged by the Group (“Personnel”).
- 1.6 For additional guidance, please refer to the jurisdiction specific annex applicable to you set out in Appendix 1 to this policy, and where relevant the local Samsonite whistleblower policy specific to your jurisdiction. The terms of any jurisdiction specific annex, any local

Samsonite whistleblower policy and locally applicable law may provide specific additional legal protection that is exclusively reserved for subject matters and to Personnel falling within the scope of that specific legal regime.

- 1.7 Information on how to make a report or raise a concern for other stakeholders, for example, former employees, job candidates, suppliers, customers, shareholders and holders of voting rights in the Group, contractors and sub-contractors (as well as the members of the administrative, management or supervisory body of such contractors and subcontractors), is available at www.samsonite.ethicspoint.com.

2. What should be reported?

Reportable Conduct

- 2.1 Samsonite encourages you to speak up when you know or suspect that there has been or there may imminently be a breach of applicable law or regulation, Samsonite's Code of Conduct or other Group policies, when you know or suspect that there has been or may be conduct that might compromise Samsonite's or the Group's reputation or the interests of its stakeholders, or that is otherwise improper or unethical ("Reportable Conduct").
- 2.2 Examples of Reportable Conduct to be reported may include (but is not limited to) concerns regarding:
- legal or regulatory compliance;
 - breaches of Samsonite or Group policies or procedures;
 - sales practice or market conduct violations;
 - bribery or other improper payments or gifts;
 - fraudulent activity;
 - compliance with antitrust or competition laws;
 - potential conflicts of interest;
 - the integrity of the Group's accounting practices, internal controls, auditing matters or public filings;
 - bullying, discrimination or harassment; and
 - potentially unsafe or dangerous practices, including those which may threaten public health, safety, or the environment.

If you want your concern to be treated as a report under this policy, you must use the channels described in Section 3.1 below. However, general issues or minor workplace grievances in relation to your employment or engagement (e.g., salary and benefits, performance appraisals) would not generally amount to Reportable Conduct under this policy. These issues should be raised with human resources. If you raise a concern that the human resources team reasonably believe should be addressed under this policy, then Samsonite may deal with the matter under this policy instead.

What should the report include?

- 2.3 A report should be as detailed as possible to facilitate its proper review and investigation. It will be more difficult, and sometimes not possible, to fully investigate an issue where Samsonite does not receive adequate information on the Reportable Conduct.
- 2.4 Therefore, a report should include the following details to the extent known or suspected by you:
- details of your relationship with Samsonite;
 - detailed description of relevant events and how they came to your attention;
 - the date, time and place of relevant events (and if relevant, their frequency);
 - the name of the legal entity in which the event took place;
 - the names and job positions of the persons involved, or other information that enables such persons to be identified;
 - the names of other persons, if any, who are witnesses to or otherwise may have information about the reported facts;
 - any other information, documentation or evidence that could help those who investigate the report to verify the reported facts; and
 - you are encouraged to provide your name in the report, so that we can follow-up with you as necessary, but this is not mandatory.
- 2.5 A reporter who knowingly and intentionally, or negligently, makes a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment or other legal proceedings.

3. How can reports be made?

What channels can be used?

- 3.1 You can make a report in the following ways:
- via the Samsonite Ethics Reporting Hotline either online at www.samsonite.ethicspoint.com or by calling toll-free using the applicable access code and phone number for the relevant jurisdiction found on www.samsonite.ethicspoint.com.
 - you can also contact your regional or corporate heads of HR or legal and request an in-person meeting to raise your report in that way.
- 3.2 You can make a report in writing or orally. In each of the cases above, you can also request to have an in-person meeting with someone from the regional or corporate HR or legal departments to raise your report in that way.

- 3.3 Subject to applicable law and regulation, reports are made confidentially and can be made anonymously. Please see more details in paragraph 5 below.
- 3.4 While we encourage you to report any concerns through these internal reporting lines before reporting any concerns externally, nothing in this policy in any way prohibits or is intended to restrict or impede you from exercising protected rights or otherwise disclosing information to external reporting agencies such as law enforcement agencies, regulatory, or administrative agencies as permitted by and in accordance with applicable law or regulation. Details of the external reporting procedures relevant to you and your jurisdiction are available by contacting Samsonite at ethics.hotline@samsonite.com.

Samsonite Ethics Reporting Hotline

- 3.5 The easiest way to make a report under this policy is through the Samsonite Ethics Reporting Hotline (, the “Hotline”). You can submit reports through the Hotline either online at www.samsonite.ethicspoint.com or by calling toll-free using the applicable access code and phone number for the relevant jurisdiction found on www.samsonite.ethicspoint.com.
- 3.6 The Hotline is available 24 hours a day, seven days a week, and is provided by Navex, a third-party service provider based in the United States. The Hotline enables you to file a report in your own language.
- 3.7 In making the report through the Hotline, you may choose to remain anonymous, in which case your identity will not be disclosed by Navex.
- 3.8 Once you have raised your concern with Navex through the Hotline, the matter will be referred to appropriate personnel at Samsonite for review.

4. No retaliation

- 4.1 Consistent with applicable law and regulation, Samsonite and the Group prohibit and will not tolerate any threatened, attempted or actual retaliation against or victimization of any Personnel who: (i) make a report to the Company or the Group under this policy; (ii) assists another member of Personnel to make a report under this policy; (iii) has a personal relationship with the member of Personnel who makes a report under this policy; or (iv) participates or is otherwise involved in an investigation or other proceedings in relation to or in respect of a report made under this policy (including any individual accused in the report).
- 4.2 Prohibited retaliation or victimization means any form of adverse employment related action, including but not limited to demotion or limiting career opportunities, suspension, discipline (up to and including termination), intimidation or threats, exclusion from team events, harassment or discrimination, reassignment, negative performance feedback, or reduction in compensation or hours.

- 4.3 Retaliation or victimization is reportable under this policy, and may result in disciplinary action, up to and including termination of employment. If you have been subject to any conduct that you believe constitutes retaliation or victimization, please immediately report the alleged retaliation or victimization in accordance with paragraph 3.1 above or alternatively, by speaking to a regional or corporate head of HR.
- 4.4 Any Personnel who discourages or prevents another either from making a report or seeking the help or assistance she or he needs to make such a report may face disciplinary action, up to and including termination of employment or other legal proceedings.

5. Confidentiality and anonymous reports

Confidentiality

- 5.1 Samsonite (and where relevant, Navex) will manage all reports (including both anonymous and non-anonymous reports) raised under this policy confidentially. Samsonite (and where relevant, Navex) will endeavor to protect the identity of any person who is subject to or may be named in a report or is connected with Reportable Conduct.
- 5.2 Any information that you provide will be managed in confidence to the extent reasonably practicable and consistent with Samsonite's legal and regulatory obligations and the requirement to conduct a thorough review and investigation of the matter. Samsonite will also endeavor to share information only on a need-to-know basis with those who are involved in investigating, reporting or resolving the matter (except where disclosure is either prohibited or required by law or regulation). Access to this information is strictly forbidden to staff members who are not authorized to have knowledge of it.

Anonymous reports

- 5.3 When raising a report under this policy, you are encouraged to identify yourself. However, anonymous reports can be made subject to applicable law and regulation. If in making the report through the Hotline you choose to remain anonymous, your identity will not be disclosed by Navex.
- 5.4 Making a report anonymously may affect your ability to receive feedback on the status of any investigation, if any, and may affect Samsonite's ability to effectively investigate the matter or offer protection to you. Anonymous whistleblowers are particularly encouraged to provide as much information and evidence as possible since additional follow-up with an anonymous whistleblower may not be possible (please see paragraph 2.4 above).

6. Investigating Reportable Conduct.

- 6.1 All reports made under this policy will be taken seriously. Once you have raised Reportable Conduct as set out in this policy, the matter will be reviewed and assessed to decide what

action should be taken and who should investigate the Reportable Conduct (where such an investigation is appropriate).

- 6.2 Depending on the nature of the report, the Reportable Conduct may be investigated by corporate or regional legal departments, internal audit or human resources, as applicable, or by other corporate or local teams under their supervision. Where appropriate or necessary, Reportable Conduct may also be investigated (in full or in part) by external legal counsel or other third-parties e.g. forensic accountants etc.
- 6.3 It is Samsonite's general practice that individuals personally involved in the Reportable Conduct will be excluded from the investigation team and will not be allowed to participate in the consideration of the report or the determination of what action, if any, should be taken with respect to the report.
- 6.4 All Personnel are expected to cooperate fully and honestly with any internal investigation and will be protected from any retaliatory action arising from their participation in such an investigation. Any Personnel who fail to cooperate (e.g., by not providing complete and truthful information or intentionally providing misleading information) may be subject to disciplinary action.

7. How do we follow-up on reports?

Feedback

- 7.1 Within seven days of receipt of a report, an acknowledgement of receipt will be sent to the reporter (including to an anonymous reporter where this is possible).
- 7.2 Not later than three months after the acknowledgement of receipt, the reporter (including an anonymous reporter where this is possible) will receive an update about the ongoing or concluded investigation of his or her report. Given the often sensitive nature of investigations and certain limitations under applicable law and regulation, Samsonite may not be in a position to provide a reporter with any specific information in connection with such update or in connection with the outcome of an investigation. Specific information will be provided on a case-by-case basis. A reporter must treat any information provided by Samsonite about the investigation or the outcome as confidential.
- 7.3 The reporter (including an anonymous reporter where this is possible) will also be informed in writing of the closing of the file, as the case may be.

Remedial and disciplinary action

- 7.4 The specific action taken in any particular case (if any), will depend on the nature and gravity of the Reportable Conduct reported and the results of the investigation.
- 7.5 If misconduct has been confirmed through an investigation, the Company or the Group will take prompt and appropriate remedial action proportionate to the seriousness of the misconduct and in accordance with its procedures and practices. Such remedial action

may include disciplinary action, up to and including termination of employment and/or other legal proceedings. Reasonable and necessary steps will also be taken to prevent any further occurrence of the misconduct.

Reporting

- 7.6 The corporate legal department or internal audit department will make periodic reports to the Board of Directors of the Company or any relevant committee of the Board of Directors on whistleblower reports received. Such reports will comply with the terms of this policy with respect to maintaining the confidentiality of the report, investigation and identity of the reporter.
- 7.7 Subject to applicable law and regulations, information in relation to the Reportable Conduct, the report and/or the specific investigation may be communicated to public bodies or authorities. In doing so, Samsonite and the Group will strive to maintain the confidentiality of the identity of the reporter in accordance with this policy and its legal and regulatory obligations.

8. Legal compliance

- 8.1 This policy seeks to establish global guidelines and, where appropriate, to provide the basis for developing local standards in consideration of applicable local law, regulation, works council and trade union agreements. If any part of this policy conflicts with applicable local law and/or regulation, such applicable local law and/or regulations must be followed and/or taken into due consideration in the interpretation of this policy. For the avoidance of doubt, this policy together with the jurisdiction specific annexes in Appendix 1 do not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.
- 8.2 In circumstances when there is a question as to whether this policy can be followed, or where there is a conflict with applicable local law and regulation and this policy, Personnel must seek guidance from the corporate or regional legal department before taking action.

9. Data privacy

- 9.1 In operating this policy, including in receiving and investigating reports, it is inevitable that Samsonite, members of the Group and certain third parties engaged by Samsonite or the Group from time to time (including Navex) will collect and process personal data.
- 9.2 Any processing of personal data in relation to the operation of this policy (including any international transfers of personal data) will be carried out in accordance with applicable law and regulation, and the Group's own policies and procedures. Please refer to the data

privacy policies and notices maintained by Samsonite and the relevant members of the Group from time to time.

Appendix 1 Jurisdiction Specific Annexes

A. Australia

Samsonite Australia Pty Limited (“Samsonite Australia”) is required to observe (and this policy together with this annex complies with) the requirements of any applicable Australian legislation regarding the protection of whistleblowers, including those under the *Corporations Act 2000* (Cth) (“Corporations Act”).

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Introduction

1 Further to paragraph 1 of the policy, this policy is available to every employee and officer of Samsonite Australia via <https://corporate.samsonite.com/en/policies.html>.

Who is covered?

1.5 Further to paragraph 1.5 of the policy, this policy also applies to:

- contractors of Samsonite Australia;
- individuals who supply goods or services to Samsonite Australia;
- employees of a person or entity who supplies goods or services to Samsonite Australia (whether paid or unpaid);
- relatives or dependants of any of the persons listed above; and
- relatives or dependants of officers and employees of Samsonite Australia.

The persons referred to in paragraph 1.5 are considered “eligible whistleblowers”. In order to qualify for protection under the Corporations Act, disclosures must be made by an eligible whistleblower. However, for consistency with the policy, eligible whistleblowers will be referred to in this annex as 'reporters'.

Reportable conduct

2.1 Further to paragraph 2.1 of the policy, Reportable Conduct is a “protected disclosure” under the Corporations Act if it is made by a reporter (i.e., an eligible whistleblower) to an eligible recipient (see paragraph 3.1 of this annex below).

2.2 Further to paragraph 2.2 of the policy, whistleblowing protections under the Corporations Act are not intended to apply to disclosures relating to any personal work-related grievance or conduct concerning a person’s individual employment or former employment such as:

- an interpersonal conflict at work;

- a decision relating to engagement, transfer or promotion;
- a decision relating to the terms and conditions of engagement; and
- a disciplinary decision including to suspend or terminate a person.

Such matters should be raised with HR.

What channels can be used?

- 3.1 Further to paragraph 3.1 of the policy, you can also make a report to officers and senior managers of Samsonite Australia.

The persons referred to in paragraph 3.1 are considered “eligible recipients”. In order to qualify for protection under the Corporations Act, disclosures must be made to an eligible recipient.

Reports may also be made to the following external parties:

- auditors (including any member of the audit team) of Samsonite Australia;
- actuaries of Samsonite Australia;
- legal practitioners; and
- relevant regulators, such as the Australian Securities & Investments Commission.

Further, in certain circumstances, 90 days after an individual has made a report in accordance with this policy, the reporter may give limited disclosure of the matter to a member of Parliament or a journalist, provided that the individual has reasonable grounds to believe that: (a) no action is being, or has been, taken to address the matters they raised in their report, or the making of a further disclosure would be in the public interest; and (b) the making of a further disclosure would be in the public interest.

No retaliation

- 4 Further to paragraph 4 of the policy, Samsonite Australia is committed to protecting those who make a disclosure in accordance with this policy.

Other protections available to reporters

Insert the following after paragraph 4 of the policy:

- 4A The fact that a person has made a protected disclosure will not give rise to any civil, criminal or administrative liability (including disciplinary action) on the part of the reporter, and the fact of making the disclosure and its content is not admissible against the reporter in criminal or civil proceedings.

However, the reporter may be subject to disciplinary, civil or criminal actions for having made a false disclosure and/or in connection with the reporter’s own conduct which is revealed by the matters highlighted in the disclosed information (i.e. the reporter’s own

conduct in the misconduct, improper affairs or other circumstances which are revealed by the protected disclosure).

- 4B Reporters are encouraged to seek independent legal advice in relation to compensation and other remedies under the Corporations Act.

Investigating Reportable Conduct

6.4 Further to paragraph 6.4 of the policy, Samsonite Australia will ensure fair treatment of employees mentioned or implicated in a protected disclosure or to whom such a disclosure relates by applying the following principles:

- to the extent practicable, the identity of an implicated employee will be kept confidential during the investigation relating to that person;
- an investigator appointed to investigate a protected disclosure will act impartially and without bias in conducting the investigation; and
- an investigation will allow a fair process.

B. Belgium

This annex describes where the Local Belgian whistleblowing policy differs from Samsonite's global whistleblowing policy.

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Who is covered

- 1.1 In addition to the persons mentioned under 1.5 of the global policy, the regulatory protection of whistleblowers also applies to:
- facilitators i.e. natural persons who assist a person making a report in the reporting process, and whose assistance should be confidential;
 - third persons who are connected with the reporting persons and who could suffer retaliation in a work-related context (e.g. colleagues, relatives, witnesses, ...); and
 - legal entities that the reporting persons own, work for or are otherwise connected within a work-related context (e.g. management company).

Reportable conduct

- 2.1 Reports concerning the following area's fall within the material scope for whistleblowing for Belgium. The measures for protection of the whistleblower as stated in the Belgian law of 28 November 2022 on the protection of persons who report violations of Union or national law within a legal entity in the private sector (the **Belgian Law**) apply to the reports made for areas of the material scope.
- Public procurement (e.g. award of concession contracts);
 - Financial services, products and markets, and prevention of money laundering and terrorist financing (e.g. trading, banking);
 - Product safety and compliance (e.g. General Product Safety Directive);
 - Transport safety (e.g. regulation on tachographs in road transports);
 - Protection of the environment (e.g. pollution, environmental standards for production);
 - Radiation protection and nuclear safety;
 - Food and feed safety, animal health and welfare (e.g. trackability);
 - Public health (e.g. quality and safety for medicinal products);
 - Consumer protection (e.g. warranty);

- Protection of privacy and personal data, and security of network and information systems (non-compliance with the GDPR);
 - Breaches affecting the financial interests of the Union (e.g. corruption);
 - Breaches related to the internal market (e.g. price-fixing);
 - Fight against social fraud (e.g. non-registered work);
 - Fight against fiscal fraud (e.g. tax fraud).
- 2.2 The following areas are excluded from the material scope. Reports that fall within these areas are not covered under the Belgian Law.
- National security (except breaches to Union law regarding public procurement);
 - Classified information;
 - Legal and medical professional privilege;
 - Rules on criminal procedure.

External reporting

- 3.1 It is strongly recommended to first report infringements via the internal reporting channel within Samsonite. This will allow the organisation to investigate the report and take any appropriate action.
- 3.2 Within the European Union, a whistleblower has the option to report externally a breach that falls within the scope of the whistleblowing legislation, to a local competent authority responsible for receiving and investigating whistleblower reports. For Belgium, reporters can report externally to the federal ombudsman or the competent authorities. Details of the external reporting channels relevant to you are available on the Intranet.

Local or central reporting

- 4.1 Reports related to the Belgian entity of Samsonite can be submitted for local or central reporting.
- 4.2 Local reporting means that the report will be received by the local case managers, not by the corporate case managers. The investigation of the case, should it fall within the scope of whistleblowing, will be done by local case handlers (internal or external) and will be followed-up by the local case managers (local internal audit). If necessary or appropriate, the case managers can ask support from corporate case handlers. If the report describes an incident that should be reported to the corporate audit committee, the local case managers will share the report with corporate internal audit and corporate legal for them to assess if the audit committee should be informed.
- 4.3 Central reporting means that the report will be received by the corporate case managers. The investigation of the case, should it fall within the scope of whistleblowing, will be done

by local or corporate case handlers (internal or external) and will be followed-up by the corporate case managers (corporate internal audit).

Confidentiality

- 5.1 In case of a whistleblowing report, confidentiality is also guaranteed for facilitators of the report as well as for third persons who are connected to the reporter and who could suffer retaliation in a work-related context. Confidentiality is also guaranteed for entities that the whistleblower owns, works for or is otherwise connected with in a work-related context.

Conditions for protection

- 6.1 Whistleblowers shall qualify for protection provided that:
- they had reasonable grounds to believe that the information on breaches reported was true at the time of reporting and that such information fell within the scope of the Belgian law; and
 - they reported either internally or externally or made a public disclosure.
- 6.2 The persons referred to under 1.1 above shall qualify for protection provided that they had reasonable grounds to believe that the whistleblower fell within the scope of protection of the Belgian Law.
- 6.3 Samsonite employees also retain the right to consult union representatives, employees cannot suffer from retaliation measures for doing so.

Data Privacy

- 7.1 For any processing of personal data in relation to the operation of the global policy and this annex, please refer to Samsonite's privacy notice available on the Intranet.

C. Hungary

This annex describes the rules that are specific to Samsonite-Hungária Bőrönd KFT (“Samsonite Hungary”) and that will apply in addition to the general principles provided for in the policy.

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Scope of this policy

In addition to the personnel specified in paragraph 1.5 of the policy, the protections provided by Hungarian law also apply to:

- (a) former employees;
- (b) job applicants;
- (c) self-employed persons or sole proprietorships having a contractual relationship with Samsonite, or any former self-employed person or sole proprietorship who previously had a contractual relationship with Samsonite;
- (d) shareholders (or former shareholders) and any person who is (or was) a member of Samsonite's administrative, management or supervisory body, including a non-executive member;
- (e) contractors, subcontractors, suppliers or persons under the supervision and control of a trustee who have initiated the procedure for establishing a contractual relationship with Samsonite, or who are or have been in a contractual relationship with Samsonite;
- (f) trainees and volunteers working for Samsonite, any former trainees and volunteers of Samsonite; and
- (g) a person who wishes to enter into a legal relationship or contractual relationship with Samsonite within the meaning of points (c), (d) or (f) and for whom the procedure for the establishment of such a legal relationship or contractual relationship has been initiated.

D. Italy

This annex describes the rules that are specific to Samsonite S.p.A. (“Samsonite Italy”) and that will apply in addition to the general principles provided for in the policy.

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Who is covered?

1.1 In addition to the personnel mentioned in paragraph 1.5 of the policy, the protections provided by the Italian Whistleblowing Decree (the “Italian WB Decree”) also apply to:

- self-employed workers, collaborators and consultants;
- volunteers;
- shareholders and persons with functions of administration, management, control, supervision or representation;
- job candidates; and
- former employees.

1.2 The protections provided by the Italian WB Decree in relation to whistleblowers also apply to:

- so-called facilitators (i.e. natural persons who assist the whistleblower in the reporting process, operating within the same working environment and the help of whom must be kept confidential);
- persons within the same working environment of the whistleblower and who are linked to him or her by a stable emotional bond or family relationship within the fourth degree;
- colleagues of the whistleblower who work in the same working environment of the whistleblower and who have a regular and current relationship with him or her; and
- entities owned by the whistleblower or for which he or she works, as well as entities operating in the same working environment as the whistleblower.

E. Japan

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Scope of this policy

For Japan, in addition to the personnel specified in paragraph 1.5, this policy also applies to the following personnel in Japan:

- former directors, former officers and former employees who retired or resigned from the Group within one year of the date on which the Reportable Conduct is reported; and
- any agency or contingent workers who have worked for the Group within one year of the date on which the Reportable Conduct is reported.

The term “Personnel” in this policy also includes the above personnel for Japan.

Person in charge of the report (公益通報対応業務従事者)

In accordance with the policy, the Reportable Conduct may be investigated by corporate or regional legal departments, internal audit or human resources, as applicable, or by other corporate or local teams under their supervision (see section 6). Based on the investigation, [name or function] will decide on what (if any) follow-up steps will be taken (see section 7). For the purpose of the Whistleblower Protection Act, the head of the relevant department or team which conducts the investigation and [name or function] are designated as a person in charge of the report (公益通報対応業務従事者). Persons who are specifically assigned to be engaged in the investigation or follow-up steps are also designated as a person in charge of the report.

F. Spain

This annex describes the rules that are specific to Samsonite España S.A. (“Samsonite Spain”) and that will apply in addition to the general principles provided for in the policy.

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Who is covered?

- 1.1 In addition to the personnel mentioned in paragraph 1.5 of the policy, the protections provided by the Spanish law of 20 February 2023 regulating the protection of persons who report regulatory infringements and the fight against corruption (the “Spanish Law”) apply to:
 - persons whose employment or statutory relationship with Samsonite Spain has already ended, as well as candidates or individuals whose employment relationship has not yet begun, in cases where the information on the Reportable Conduct was obtained during the recruitment process or pre-contractual negotiations; and
 - any person working for or under the supervision and direction of contractors, subcontractors, and suppliers of Samsonite Spain.
- 1.2 Further to paragraph 1.5 of the policy, protection measures for reporters under the Spanish Law also apply to:
 - Samsonite Spain employees who assist the reporter in the process;
 - natural persons who are related to the reporter and who may suffer reprisals, such as co-workers or relatives of the reporter; and
 - legal persons for whom a reporter works or with whom they have any other relationship in an employment context or in which they have a significant stake.

How do we follow-up on reports?

- 3.1 Further to paragraph 7.7, Personnel identified in paragraph 1.5 of the policy may contact the Independent Authority for the Protection of Informants (*Autoridad Independiente de Protección del Informante, A.A.I.*) or the relevant regional authorities or bodies to make a report concerning any acts or omissions falling within the scope of the Spanish Law, either directly or after having previously reported them to the internal channel.
- 3.2 Further to paragraph 7.7, Samsonite Spain will immediately forward to the Public Prosecutor's Office (*Fiscalía*) the necessary information on any facts that could constitute a criminal offence. If the offence affects the financial interests of the European Union, it shall be referred to the European Public Prosecutor's Office.

G. Sweden

For the avoidance of doubt, this annex does not confer any additional statutory protections for Personnel that do not otherwise exist under applicable local law and/or regulation.

Reporting restrictions

Under Swedish law, there may be some restrictions on how you may report a matter in the Hotline.

If you work in Sweden, and/or your report refers to an employee in Sweden, only certain types of alleged wrongdoings about employees in certain positions may be reported through the Hotline due to restrictions under Swedish law (regulation DIFS 2018:2). Please make sure that you follow the guidance below before you submit a report through the Hotline.

If the alleged wrongdoings cannot be reported through the Hotline for any of the reasons stated below, you may submit your report through Samsonite's other sources in accordance with the above "How can reports be made?" Section 3 of the global policy.

Which employees may I report through the Hotline?

With regards to the Hotline, the reported wrongdoing must relate to an individual in a **key or leading position** within the Company or Group. This includes all managers, board members, the lead team, CEO, CFO, etc.

Which concerns may I report through the Hotline?

The only alleged wrongdoings that may be reported through the Hotline according to Swedish law are:

- in relation to bookkeeping;
- in relation to accounting;
- bribery;
- crime within banking and finance; and
- other serious allegations concerning the vital interests of the Group, or the health and lives of individuals.