
1 What is SpeakUp and Who does it apply to?

SpeakUp platform is open to anyone who wishes to raise concerns. It is open to Breitling employees and to any stakeholders. SpeakUp is a platform enabling you, to report in complete anonymity (unless they choose to reveal their identity) any confirmed or suspected breaches of the laws or of any breach of Breitling Supplier Code of Conduct, Employee Code of Conduct and other Breitling policies. You can do this either by phone or via a secure website, from your computer or smartphone, without the interference of a human operator as explained in further details in the Frequently Asked Questions [FAQ].

2 What kind of issues can be raised?

Examples of breaches that can be raised include but are not limited to: danger for the health or safety of any person or product, discrimination, harassment, breach of internal approval rules, conflict of interest, bribery, corruption, breach of fair competition laws, breach of trade sanctions or trade restrictions, improper use of company resources, external disclosure of confidential information, improper use of social networks, unauthorised communication to media and any other breach of applicable laws, regulations or mandatory industry standards.

In contrast, for Breitling employees, if you have a personal grievance related to your employment conditions, performance review or similar concern, the SpeakUp procedure is not the right channel. In such cases, please discuss your concern with your manager or with our HR Department.

3 How to report a concern?

If you are not comfortable reporting your concern in person, or wish to remain anonymous, or wish to escalate the matter confidentially, you can report through the SpeakUp platform, either by phone or via a secure website. The SpeakUp line and website are hosted by an independent third party which guarantees the confidentiality and data protection throughout the whole process, whether you choose to state your identity or to remain anonymous. For further details on the use of SpeakUp, please refer to the Frequently Asked Questions [FAQ].

4 What happens when I report a concern?

All reports coming in through the SpeakUp platform (phone line or website) will be transmitted to a group composed by persons from Legal, Compliance and / or HR functions [Global Compliance] of Breitling. They will jointly examine the case and decide how to proceed. Matters will always be handled timely and confidentially. Your report will remain anonymous to Global Compliance unless you choose to reveal your identity.

Upon reporting by phone or through the SpeakUp web page, you will receive a unique case number, which you can use to follow up on your concern, or to provide any additional information later.

Once received, Global Compliance will evaluate and assess the information and determine the appropriate course of action. This will, in most cases, result in the responsibility for next steps being assigned to the most appropriate persons [in terms of competence, seniority and independence from the matter reported]. Information about the allegation will be shared on a strict "need to know" basis as required to conduct and complete the review and/or investigation.

The persons involved commit to take all matters concerning any misconduct seriously, cooperate with any investigation, and keep all information that they may receive about any such investigation strictly confidential. Global Compliance will ensure that reported cases are investigated and documented appropriately.

In certain cases, Global Compliance may decide not to investigate a report. Such instances may include situations where: [a] there is insufficient information for an adequate investigation and there is no possibility of obtaining further information; or [b] it is established that the report was made in bad faith.

Once an investigation is finalized, the findings will be delivered to the competent manager. The competent manager will be responsible, with prior coordination with Global Compliance, for taking remedial actions based on the findings. Upon such delivery of the findings, the case investigation will be closed. Through the SpeakUp line case management system, we will inform you about the status of the investigation.

Global Compliance will provide a high-level anonymised report to the Group ESG, Compliance & Risk Committee of the Group Board of Directors quarterly and to the Group Board of Directors once a year, about all open and closed cases as well as on cases that could not be investigated.

5 You will be protected

Breitling will not tolerate any form of retaliation directed against anyone who raises a concern in good faith. This means that, after investigation, if no breach was discovered, no action will be taken against you if you raised your concern in good faith. Reporting in good faith means that someone else in similar circumstances would reasonably believe that the reported breach exists.

With this said, Breitling will not tolerate reports made in bad faith or slanderous allegation. A bad faith report is one made dishonestly to cause harm to someone else or for personal benefit. Making a bad faith report is subject to disciplinary measures for Breitling employees, up to and including termination.

The third-party service provider that hosts the SpeakUp platform (phone line and website) will never disclose voice-file, IP addresses or phone numbers, unless if it is necessary to comply with a legal obligation upon mandatory request of the competent judicial institution or supervisory authority; in this case, the requested information can be handed over only to judicial institutions or supervisory authority. This information will in no circumstances be handed over to Breitling. When allowed by law, Breitling will only be informed of the fact that such information has been disclosed to the judicial or supervisory authority.

6 Informing the subject of a report

If a person becomes the subject of an investigation, that person will be notified of the investigation in a timely manner, unless doing so would seriously hinder the investigation or unless delaying notification is otherwise justified.

Whenever possible, the subject(s) of an investigation will have the right to address any allegations made against them and present their side of the story including any evidence they may possess.

7 Confidentiality and Data Protection

Breitling and the assigned persons handling the reported cases will treat all information received under this policy in strict confidence. The privacy of both the messenger and the subject(s) of the reports will be protected. Information will only be shared on a strict need-to-know basis. If the SpeakUp phone line is used for reporting, information will be accessed by the staff and / or translator of the third-party service provider, but only on a need-to-know basis.

You can remain anonymous on SpeakUp. If you choose to transmit personal data (such as your contact details), those will be exclusively used for the purpose of handling and investigating the case and complying with any mandatory legal requirements. Your identity will not be disclosed without your previous explicit consent.

In accordance with applicable data protection law, you have the right to access, correct, delete / "to be forgotten", to restrict or oppose to the processing, to receive your personal data in a structured and machine-readable format, to object and to file a complaint with the responsible supervisory authority at your normal place of residence. For further details, please consult Global Compliance.

Each report will be retained for a defined period in accordance with applicable legislation. Where local laws do not specify an explicit retention period, reports will be stored for a maximum of five years. If a report leads to an investigation or legal proceeding, the retention period will extend until the conclusion of that investigation or proceeding, provided that this date is after the locally established retention period or the general five-year limit.

8 Contact Details of Global Compliance

Chief Administrative Officer: Dominik Rubli, + 41 (0) 79 596 62 04

E-Mail: dominik.rubli@breitling.com

Chief People Officer: Mathieu Pointeau, +41 (0) 78 255 57 61

E-Mail: mathieu.pointeau@breitling.com

SpeakUp: <https://breitling.speakup.report/breitling>



Toll-Free Numbers for SpeakUp

Use the toll-free number of the country you are calling from and dial in the organization code (**105836**):

 BREITLING 1884				Organization Code:	105836
<u>Country</u>	<u>Phone number</u>	<u>Phone instructions</u>			
Albania	0035545301801	Number: +355 4 530 1801 Call charged at local rate			
Algeria	00213983299338	Number: +213 983 29 93 38 Call charged at local rate			
Angola	00244226425610	Number: +244 226 425 610 Call charged at local rate			
Anguilla	18334222005	Freephone: 1833 422 2005			
Antigua and Barbuda	18334222006	Freephone: 1833 422 2006			
Argentina	00541120397280	Number: +54 11 2039 7280 Call charged at local rate			
Australia	0061282846262	Number: +61 2 8284 6262 Call charged at local rate			
Austria	0800909683	Freephone: 0800 909 683			
Bahamas	18334222007	Freephone: 1833 422 2007			
Bahrain	0097316501936	Number: +973 1650 1936			
Bangladesh	008809610998462	Freephone: +880 (0) 9610 998462			
Barbados	0012466239631	Number: +1 (246) 623 9631 Call charged at local rate			
Belarus	882004910089	Freephone: 8 820 0491 0089			
Belgium	080089326	Freephone: 0800 89 326			
Belize	18000130076	Freephone: 1800 0130 076			
Benin	0022920900380	Number: +229 20 90 0380 Call charged at local rate			
Bermuda	18334222008	Freephone: 1833 422 2008			
Bhutan	009752379003	Freephone: +975 2 379 003			
Bolivia	800105122	Freephone: 800 105 122			
Bosnia and Herzegovina	0038770330093	Number: +387 70 330 093 Call charged at local rate			
Botswana	8007861103	Freephone: 800 786 1103			
Brazil	00551147008838	Number: +55 (11) 4700 8838 Call charged at local rate			

Brunei Darussalam	8014657	Freephone: 801 4657
Bulgaria	8002100645	Freephone: 800 210 0645
Burkina Faso	0022625300982	Number: +226 25 30 09 82 Call charged at local rate
Cambodia	1800209867	Freephone: 1800 209 867
Cameroon	00237657103112	Freephone: +237 6 57 10 31 12
Canada	0015143950496	Number: +1 (514) 395 0496 Call charged at local rate
Cayman Islands	0013457695580	Number: +1 (345) 769 5580 Call charged at local rate
Chile	0056224835917	Number: +56 22 483 5917 Call charged at local rate
China	108001523042	Freephone (via China Telecom): 1080 0152 3042
China	108008522221	Freephone (Via China United Network): 1080 0852 2221
China	4001201842	Country wide number with no supplier restriction: 400 120 1842 Call charged at local rate.
Colombia	00576012421247	Number: +57 601 242 1247 Call charged at local rate
Costa Rica	0050640360350	Number: +506 4036 0350 Call charged at local rate
Côte d'Ivoire	002250566770918	Freephone: +225 05 66 77 0918
Croatia	08007745	Freephone: 0800 7745
Cyprus	80091142	Freephone: 800 91142
Czechia	800050833	Freephone: 800 050 833
Denmark	004543310961	Number: +45 43 31 09 61 Call charged at local rate
Dominica	18334221998	Freephone: 1833 422 1998
Dominican Republic	0018299471996	Number: +1 (829) 947 1996 Call charged at local rate
Ecuador	1800001432	Freephone: 1800 001 432
Egypt	08000000083	Freephone: 0800 000 0083
El Salvador	0050322304752	Number: +503 2230 4752 Call charged at local rate
Estonia	003726093008	Number: +372 609 3008 Call charged at local rate
Ethiopia	800861919	Freephone: 800 86 1919
Fiji	008002650	Freephone: 008 002 650
Finland	0800392912	Freephone: 0800 392 912
France	0805543753	Freephone: 080 554 3753
French Guiana	0800991448	Freephone: 0800 99 1448
French Polynesia	0800914886	Freephone: 0800 91 4886
Georgia	1800008013	Freephone: 1800 008 013
Germany	08001818952	Freephone: 0800 1818 952
Ghana	00233596993553	Number: +233 59 699 3553 Call charged at local rate

Greece	0080044145924	Freephone: 0080 0441 45924 The number will not work when called from a mobile
Grenada	0014732300333	Number: +1 (473) 230 0333 Call charged at local rate
Guam	18338096777	Freephone: 1833 809 6777
Guatemala	0050223028459	Number: +502 2302 8459 Call charged at local rate
Honduras	80027916139	Freephone: 800 2791 6139
Hong Kong	0085230194193	Number: +852 3019 4193 Call charged at local rate
Hungary	0680984589	Freephone: 06 809 845 89
Iceland	003544150349	Number: +354 415 0349 Call charged at local rate
India	0008000503159	Freephone: 0008 0005 03159
Indonesia	00622180630074	Number: +62 21 8063 0074 Call charged at local rate
Ireland	1800800636	Freephone: 1800 800 636
Israel	0097233741225	Number: +972 3374 1225 Call charged at local rate
Italy	800147694	Freephone: 800 147 694
Jamaica	0018766779125	Number: +1 (876) 677 9125 Call charged at local rate
Japan	0081366270734	Number: +81 3 6627 0734 Call charged at local rate
Jordan	080023801	Freephone: 0800 23801 No mobile access
Kazakhstan	007877273574582	Number: (+7) 877 2735 74582 Call charged at local rate; No mobile access
Kenya	00254207650957	Number: +254 20 765 0957 Call charged at local rate
Korea	0082237005146	Number: +82 2 3700 5146 Call charged at local rate
Kuwait	0096522055730	Freephone: +965 2205 5730
Latvia	80005929	Freephone: 800 05929
Lebanon	8338160193	Freephone: 833 816 0193
Lithuania	880030366	Freephone: 8800 30366
Luxembourg	003523420808982	Number: +352 342 080 8982 Call charged at local rate
Malaysia	0060377243136	Number: +60 3 7724 3136 Call charged at local rate
Malta	80065144	Freephone: 8006 5144
Martinique	0800901651	Freephone: 0800 90 1651
Mauritius	0023052970999	Number: +230 5 297 0999 Call charged at local rate
Mexico	00525547806198	Number: +52 55 4780 6198 Call charged at local rate
Moldova	080060016	Freephone: 080 060 016
Morocco	00212530144108	Number: +212 5 30 14 41 08 Call charged at local rate
Myanmar	08008008062	Freephone: 0800 800 8062

Namibia	00264833800103	Freephone: +264 83 380 0103
Nepal	18000010186	Freephone: 1800 001 0186
Netherlands	0031107007503	Number: +31 10 700 75 03 Call charged at local rate
New Zealand	006499135892	Number: +64 9 913 5892 Call charged at local rate
Nicaragua	0050575137610	Number: +505 7513 7610 Call charged at local rate
Nigeria	07080601221	Freephone: 070 8060 1221
North Macedonia	0038925513216	Number: +389 2551 3216 Call charged at local rate
Norway	004724140601	Number: +47 24 14 06 01 Call charged at local rate
Oman	80074161	Freephone: 8007 4161
Pakistan	0080090044437	Freephone: 0080 0900 44437
Panama	005073084480	Number: +507 308 4480 Call charged at local rate
Papua New Guinea	000861322	Freephone: 0008 61322
Paraguay	0098004410266	Freephone: 0098 0044 10266 No mobile access
Peru	080074535	Freephone: 0800 74535
Philippines	180083948474	Freephone: 1800 8394 8474 Can only be connected by Globe Telecom device
Poland	800012953	Freephone: 800012953
Portugal	800831302	Freephone: 800 831 302
Puerto Rico	0017872007305	Number: +1 (787) 200 7305 Call charged at local rate
Qatar	00800101094	Freephone: 00800 101 094
Réunion	1800916980	Freephone: 1800 916 980
Romania	0800400653	Freephone: 0800 400 653
Russian Federation	88001006994	Freephone: 8 (800) 100 69 94
Saudi Arabia	8008501433	Freephone: 800 850 1433
Serbia	0038110520043	Number: +381 10 520 043 Call charged at local rate
Seychelles	800131	Freephone: 800 131
Singapore	006564037051	Number: +65 6403 7051 Call charged at local rate
Slovakia	0800113418	Freephone: 0800 113 418
Slovenia	080083115	Freephone: 0800 83115
South Africa	0027214277937	Number: +27 (21) 427 7937 Call charged at local rate
Spain	0034900031156	Number: +34 900 031 156 Call charged at local rate
Sri Lanka	0094720910370	Number: +94 (72) 091 0370 Call charged at local rate
Sudan	00249156559883	Freephone: +249 15 655 9883
Suriname	8338160919	Freephone: 833 816 0919
Sweden	0201604703	Freephone: 020 160 4703

Switzerland	0800005691	Freephone: 080 000 5691
Taiwan, Province of China	00886277438912	Number: +886 2 7743 8912 Call charged at local rate
Tanzania	0800111020	Freephone: 0800 11 1020
Thailand	006628449693	Number: +66 2 844 9693 Call charged at local rate
Trinidad and Tobago	0018682241869	Number: +1 (868) 224 1869 Call charged at local rate
Tunisia	0021631300338	Number: +216 31 300 338 Call charged at local rate
Turkey	00800448828602	Freephone: 0080 04488 28602
Turks and Caicos Islands	18334621355	Freephone: 1833 462 1355
Uganda	00256414238162	Number: +256 41 423 8162 Call charged at local rate
Ukraine	0800801205	Freephone: 0800 801 205
United Arab Emirates	80004440408	Freephone: 800 0444 0408
United Kingdom	08000224118	Freephone: 080 0022 4118
United States of America	0016692887154	Number: +1 (669) 288 7154 Call charged at local rate
Uruguay	000415985762	Freephone: 0004 1598 5762
Venezuela	00582123357722	Number: +58 212 335 7722 Call charged at local rate
Viet Nam	008419003271	Number: +84 1900 3271 Call charged at local rate
Virgin Islands (British)	18334621356	Freephone: 1833 462 1356
Virgin Islands (U.S.)	18337246398	Freephone: 1833 724 6398
Zimbabwe	002638677422010	Freephone: +263 867 742 2010