

Local Whistleblowing Policy for Italy

Foot Locker, Inc. and its group companies, including Foot Locker Italy S.r.l. (“**Foot Locker Italy**”) (together “**Foot Locker**”), encourage everyone who works for Foot Locker to promptly speak up and report potential misconduct via Foot Locker’s internal reporting options.

Internal reporting options: Group-wide Reporting and Local Reporting

Foot Locker offers two internal reporting options. Internal reporting can be made through either of these channels:

- a) to Foot Locker, Inc. via the group-wide reporting channel (“**Speak Up Helpline**”)
- b) to specific local Foot Locker entities via local reporting channels (“**Local Reporting**”)

This Policy describes the Local Reporting process for Italy, i.e., how reports can be made to **Foot Locker Italy** via the local reporting channel(s) for Italy (“**Local Reporting Channel(s)**”). Foot Locker Italy has established these Local Reporting Channels to comply with the obligations under the legislative decree 24/2023, implementing the EU Whistleblowing Directive (2019/1937), and to comply with the Guidelines on the Protection of Persons Reporting Violations of Union Law and Protection of Persons Reporting Violations of National Law Provisions and the Procedures for the submission and management of external reports, approved by the Italian National Anticorruption Authority (“ANAC”) in Resolution No. 478 of November 26, 2025 and No. 311 of July 12, 2023.

Reports made via the Speak Up Helpline will be handled in accordance with Foot Locker’s Code of Business Conduct available [here](#). Please refer to Foot Locker’s Code of Business Conduct for more information on the Speak Up Helpline.

Reports - which are not Reportable Concerns – as defined below - made through the Speak Up Helpline are outside the scope of this Policy and will not be handled in accordance with this Policy or the requirements under the legislative decree 24/2023.

Local Reporting to Foot Locker Italy

1 Scope

1.1 Personal scope of the Local Reporting Channels

Local Reporting to Foot Locker Italy through the Local Reporting Channels is only available to the following persons (“**Local Reporter(s)**”):

- a) Former and current employees of Foot Locker Italy, including prospective employees, paid or unpaid interns and volunteers, subcontractors, contract workers, persons performing their work on a basis other than an employment contract, and any person working under the supervision and direction of the Group, in connection with circumstances of which they became aware prior to the termination of the employment contract or during the selection phase (or other pre-contractual phases);
- b) Consultants of Foot Locker Italy, including self-employed workers under Art. 49 of the Treaty on the Functioning of the European Union, suppliers, sub-suppliers (the entire supply chain) and other business partners (including joint ventures);
- c) Shareholders and/or quota-holders of Foot Locker Italy;
- d) Members of corporate bodies of Foot Locker Italy, including members of administrative, management or supervisory bodies, and members without executive positions;

- e) Any third parties affiliated with the persons mentioned above;
- f) Local communities and members of civil society organizations (e.g., NGOs);
- g) More generally, any stakeholder of the Group.

Only Local Reporters may report to Foot Locker Italy via the Local Reporting Channels.

Anyone who does not meet the requirements of a Local Reporter can only report through the Speak Up Helpline and will be referred to it. Please refer to Foot Locker's Code of Business Conduct for more information on the Speak Up Helpline.

1.2 Material scope of the Local Reporting Channels

Local Reporting to Foot Locker Italy through the Local Reporting Channels is only available for reports of specific violations that fall within the scope of the legislative decree 24/2023. This includes the following concerns ("**Reportable Concern(s)**"):

- a) Offences under Legislative Decree 231/2001 ("**Law 231**") including, by way of example, corruption related crimes, money laundering, false accounting, tax crimes, crimes against the environment, counterfeiting, IT crimes, conspiracy, H&S crimes, and all other crimes listed in Law 231;
- b) Violations of the compliance model adopted by Foot Locker Italy under Law 231, the Code of Ethics and the policies and procedures therein mentioned;
- c) Actions or omissions that cause or may cause any kind of harm (e.g. economic, environmental, safety or reputational) to Foot Locker Italy, as well as to third parties such as employees, associates, business partners, customers or the external community;
- d) Actions or omissions that are identified as relevant by applicable local regulations governing Whistleblowing.

You can find a comprehensive list of all Reportable Concerns under the legislative decree 24/2023 in article 2, reflecting the definition of "Violations", which include all Reportable Concerns.

Other matters/concerns not qualifying as Reportable Concerns are only reportable via the Speak Up Helpline.

Reports – which are not Reportable Concerns - made through the Speak Up Helpline are outside the scope of this Policy and will not be handled in accordance with this Policy or the requirements under the legislative decree 24/2023.

2 Local Reporting

2.1 Local Reporting Channels

Local Reporters can report a Reportable Concern to Foot Locker Italy using one of the following Local Reporting Channels:

- a) To make a written report, Local Reporters must access the Local Reporting Channel for Italy on <http://footlocker.ethicspoint.com>.
- b) To make an oral report, Local Reporters must call the telephone number indicated in the Local Reporting Channel for Italy on <http://footlocker.ethicspoint.com>.
- c) To make a report in person, Local Reporters must request an in-person meeting through one of the previously mentioned Local Reporting Channels. The Local Reporting Team will then coordinate with the Local Reporter and arrange an in-person meeting within a reasonable timeframe.

2.2 Reporting means

Local Reporting to Foot Locker Italy through the Local Reporting Channels can be made

- a) In English and Italian
- b) Anonymously or by name

2.3 Local Reporting Team

All reports made through the Local Reporting Channels will initially be received and followed up on behalf of Foot Locker Italy by the **“Local Reporting Team”** consisting of:

Foot Locker Europe’s Compliance Team as well as external resources in Italy appointed by Foot Locker Italy.

2.4 Handling Local Reports

Once a report is received through the Local Reporting Channel, the Local Reporting Team will:

- a) Acknowledge receipt of the report within 7 days unless the whistleblower cannot be contacted or such communication would compromise the confidentiality of the information. Assess whether the report falls within the scope of the Local Reporting Channel (personal and material scope, see 1.1 above and 1.2 above — **“Local Report”**). Local Reports will be handled in accordance with this Policy and the requirements under the legislative decree 24/2023. If the report does not fall within the scope of the Local Reporting Channel, the Local Reporting Team will inform within 7 days the Local Reporter accordingly and refer the Local Reporter to the Speak Up Helpline. Moreover, if the internal report is submitted to someone other than the **Local Reporting Team** but is clearly identifiable as a whistleblowing report, it must be forwarded to the **Local Reporting Team** within seven days of receipt, without retaining a copy, and the reporting person must be informed that the report has been forwarded.
- b) Maintain communication with the Local Reporter, including asking for further information on the Local Report, where necessary.
- c) Notify the individuals identified in the report and the facts found therein, in accordance with applicable data protection law. Such information may be delayed in exceptional circumstances, for example in case of risk of destruction of evidence, or when it is likely to seriously jeopardize the purpose for which information is being processed.
- d) Ensure that the Local Report is diligently followed-up on and, where required, investigated.
- e) Provide feedback to the Local Reporter within a reasonable timeframe, which will not exceed three months from the date of the acknowledgement of receipt of the report or, in the absence of such notice, within three months from the expiration of the period of seven days from the submission of the report.
- f) Once an investigation is concluded and to the extent a Reported Concern has shown to be accurate, appropriate actions will be taken according to the Foot Locker’s internal procedure(s) and applicable legislation.

In any case, the ultimate responsibility to address Reportable Concerns remains with the respective Foot Locker Italy entity.

The Local Reporting Team may involve Foot Locker Group personnel or external advisers for support when following up on Local Reports to the extent required and in line with applicable rules and confidentiality requirements. The individuals called upon to perform the role of support to the manager must be in possession of the autonomy requirement and be specifically trained and competent; expressly identified, each with their respective duties and responsibilities, and previously and necessarily authorised to process personal data.

3 Confidentiality

Any Local Report, including the identity of the Local Reporter and the identity of persons mentioned in the Local Report or who are the subject of the Local Report, will be handled confidentially, subject to applicable legal and regulatory requirements. No unauthorized person is allowed access to the Local Report. In particular, pursuant to Article 12 of Legislative Decree No. 24/2023, reports must be processed only to the extent necessary for their management. The identity of the whistleblower and any information that could reveal it may not be disclosed without their consent, except to authorised persons, in compliance with the GDPR and the Privacy Code. In criminal proceedings, the identity is protected by investigative secrecy (Article 329 of the Code of Criminal Procedure); before the Court of Auditors, it may not be disclosed prior to the conclusion of the preliminary investigations. In disciplinary proceedings, it remains confidential where the complaint is based on elements other than the report; if the report forms part of the complaint and knowledge of the whistleblower's identity is essential for defence purposes, the whistleblower's consent is required. Where disclosure is necessary for the defence of the reported person, the whistleblower must be informed in writing in advance. All parties involved are protected until the conclusion of the proceedings.

4 Protection against retaliation

Foot Locker Italy has zero tolerance for retaliation. In this Policy, "retaliation" means any behavior, act, or omission, even if only attempted or threatened, that occurs in the workplace and causes—directly or indirectly—unfair harm to protected individuals including, but not limited to, those provided for in Article 17 of Legislative Decree 24/2023. For example, shall constitute retaliation a dismissal, suspension or equivalent measures, a demotion or failure to promote, a change of duties, change of workplace, reduction of salary or a modification of working hours carried out on account of the Report.

Local Reporters are protected from retaliation if they, at the time they made the report, had reasonable grounds to believe that the information in the Local Report was true and fell within the scope of this Policy, even if the Local Report is later found to be factually inaccurate ("**Good-Faith Reporters**").

The protection against retaliation also applies, where applicable, to:

- a) Third parties who confidentially support a Good-Faith Reporter in making the report,
- b) Third parties associated with the Good-Faith Reporter and who could suffer retaliation in a work-related context, such as a colleague or relative of the Good-Faith Reporter, and
- c) Legal entities that the Good-Faith Reporter owns, works for or are otherwise connected with in a work-related context.

Foot Locker Italy will take appropriate disciplinary action, including termination of employment, against anyone who threatens or engages in retaliation or harassment of any Good-Faith Reporter or person who is considering reporting a Reportable Concern in accordance with this Policy.

5 False allegations

Just as Foot Locker Italy seeks to protect Good-Faith Reporters, it also seeks to protect those who are falsely accused in a Local Report. Foot Locker Italy will take appropriate disciplinary action, including termination of employment, against anyone who knowingly reports false information.

6 External reporting

Foot Locker Italy strongly encourages Local Reports to be made internally so that Foot Locker Italy has an opportunity to investigate and remedy any Local Concerns. Should a Local Reporter choose to report their Local Concerns externally in compliance with applicable law, the competent authorities for external reporting in Italy are set out in the legislative decree 24/2023. In particular, the local

external reporting channels can be accessed through the following link:
<https://whistleblowing.anticorruzione.it/#/>.

Local Reporters may also make a report to institutions, bodies, offices or agencies of the European Union, such as the following:

- European Commission
- European Anti-Fraud Office (OLAF)
- European Maritime Safety Agency (EMSA)
- European Union Aviation Safety Agency (EASA)
- European Securities and Markets Authority (ESMA)
- European Medicines Agency (EMA)

7 Key Contacts

For any questions regarding the internal reporting channels or if you need support, you may consult and/or seek advice from the following person(s):

legaleurope@footlocker.com

Please note that the abovementioned key contacts are not an internal reporting channel and should not be used for making reports, but only for questions regarding the internal reporting process.