

# Whistleblowing Policy

## Contents

<b>0. Introduction</b> .....	3
<b>1. Objectives and Scope</b> .....	4
<b>2. Target Audience</b> .....	4
<b>3. Responsibility</b> .....	4
<b>3.1. Process Owner</b> .....	4
<b>3.2 Involved Functions</b> .....	5
<b>4. Haier Europe’s Whistleblowing Policy: a brief introduction to how it works</b> .....	5
<b>4.1. Whistleblowing Reports</b> .....	6
<b>4.1.1. Management of Internal Reports</b> .....	6
<b>4.1.1.1 Content of Reports</b> .....	8
<b>4.1.1.2 Objective Profile of Reports</b> .....	8
<b>4.1.1.3 Subjective Profile of Reports</b> .....	9
<b>4.1.2 Confidentiality and protection of the reporter</b> .....	10
<b>4.1.3 Confidentiality and protection of the reported person</b> .....	12
<b>4.1.4 False Reports</b> .....	12
<b>4.1.5 Management of External Reports</b> .....	12
<b>4.2 Public Disclosures of Reports</b> .....	13
<b>4.3 Audit Activities on the basis of Whistleblowing reports</b> .....	13
<b>4.3 RACI Matrix</b> .....	14
<b>5. Reporting Procedure</b> .....	14
<b>6. Investigation Procedure</b> .....	18
<b>7. Conflict of interest</b> .....	19
<b>8. Processing of Personal Data</b> .....	19
<b>9. Policy issuance and revision</b> .....	21
<b>10. Policy violations</b> .....	21
<b>11. Form</b> .....	25
<b>12. Changes History</b> .....	25

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**ATTACHMENT A: WHISTLEBLOWING REPORTING MANAGEMENT PROCESS FLOW CHART**  
.....27

**ATTACHMENT B: WHISTLEBLOWING PRIVACY NOTICE** .....28

## 1. 0. Introduction

The entry into force of Legislative Decree No. 24/2023-which recalls Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, implementing Directive (EU) 2019/1937 on the protection of persons who report violations of Union law and contains provisions on the protection of persons who report violations of national regulatory provisions-has introduced significant innovations in the area of whistleblowing, both in the private and public sectors.

With reference to the private sector, the legislation extends the subjective perimeters (who can make a report), objective perimeters (what can be reported) as well as the procedure for overseeing the report under the previous legislation (specifically, in the private sector, Law No. 179/ 2017).

In addition to reports on the Company's internal channels, external reports can be made on the channels operated by ANAC (National Anti-Corruption Authority) under certain conditions, as well as, in specific and detailed cases, public disclosure of the report.

Haier Europe, in the spirit of giving concrete application to the relevant regulatory provisions in force, as introduced by Law 179/2017 and, subsequently, amended by Legislative Decree 24/2023 - also considering the "**Guidelines on the protection of persons who report violations of Union law and protection of persons who report violations of national regulatory provisions. Procedures for the submission and management of external reports,**" finally approved by ANAC, following public consultations, by **Resolution no. 311 of July 12, 2023** - issues this Policy (hereinafter the "**Policy**"), in order to establish the procedures through which to make a report of unlawful conduct, commission or omission, which constitutes or may constitute a violation, or inducement to a violation of laws and regulations, values and principles enshrined both within Haier Europe's Code of Ethics and ESG Business Code of Conduct as well as its subsidiaries (hereinafter "Haier" or the "Group"), principles of internal control, Company Policies and Ethics & Integrity standards, and/or which may cause, in the context of relations with one or more Group companies, damage of any kind (e.g. economic, environmental, on the safety of workers or third parties, or even only of image) to the same, as well as to customers, associates, business partners, third parties and, more generally, to the community (hereinafter "**Report**").

If there is definite information or reasonable suspicion based on precise and concordant facts, that any of the above conduct has occurred or may occur, a written or oral report may be made, either anonymously or identifiably, with absolute assurance of confidentiality and privacy at all stages of the proceedings, through any of the channels made available by Haier.

For further questions or concerns, it is suggested that you contact the Senior Legal and Compliance Specialist.

## 2. 1. Objectives and Scope

The purpose of this Whistleblowing Policy ("**Policy**") is to set out how suspected misconduct or wrongdoing may be reported, and how such reports will be processed by Haier Europe and its subsidiaries (hereafter, collectively, "**Haier**" or, simply, the "**Group**") employees (internal stakeholders) and third parties (external stakeholders).

**This Policy is intended to enable the Group's internal and external Stakeholders to raise concerns and disclose relevant information regarding misconduct or wrongdoing to contribute to a safe, healthy, law-abiding, and ethical workplace.**

**Haier is committed to the highest standards of ethical conduct and behaviour and encourages the disclosure of any type of misconduct or illegal behaviour in violation of Group's Code of Ethics, ESG Business Code of Conduct, applicable Ethics & Integrity Policies, Procedures and Guidelines as well as any regulations deemed applicable and set forth.**

**Haier aims not only at preventing nonconformities or irregularities within the organization, but also at involving all relevant Stakeholders in counteracting illegality through active and responsible participation.**

Haier will comply with its obligations to protect the person making a report in accordance with applicable laws and regulations, including the Data Protection Act.

In the event that local laws and regulations are inconsistent with this Policy or impose a higher level of protection than the Policy, those local laws and regulations shall prevail.

## 3. 2. Target Audience

Distribution list of this Policy (hereinafter referred to as "**Stakeholders**" and/or "**Reporting Parties**") are:

- a) members of corporate bodies, Group employees (Internal stakeholders);
- b) customers, suppliers, partners, consultants, associates and, more generally, the Group's Stakeholders (hereinafter, the "external Stakeholders" or, more simply, the "**Third Parties**").

## 4. 3. Responsibility

### 4.1.1 3.1. Process Owner

Head of Legal and Compliance Department.

Senior Legal and Compliance Specialist.

#### 4.1.2 3.2 Involved Functions

Head of Human Resources.

Head of Internal Control.

Head of Internal Audit.

### 5. 4. Haier Europe's Whistleblowing Policy: a brief introduction to how it works

Haier is committed to maintaining the highest standards in terms of conduct, integrity, and ethical behaviour, as summarized both in Code of Ethics and ESG Business Code of Conduct, and other relevant Group's Ethics & Integrity Policies.

The purpose of this Document is to:

- To help create a corporate culture based on transparency and trust;
- remove factors that may hinder or disincentivize reporting, such as doubts and uncertainties about the procedure to be followed and reporters' fears of retaliation or discrimination as a result of reporting;
- provide clear guidance about the channels of communication, the subject matter, and how to make reports, so that everyone knows them and can verify their correct application at any time, minimizing the risk of abuse.

This Policy is, likewise, aims at creating conditions useful for:

- a) ensure the confidentiality of the identity of the reporter and the alleged perpetrator of the violation (so-called "reported"), without prejudice to the rules governing the initiation of investigations or judicial proceedings, by national authorities, in relation to the facts that are the subject of the report or otherwise disciplinary proceedings initiated by the Company in the case of reports made in bad faith;
- b) adequately protect the bona fide reporting party against any form of retaliation, discrimination or penalization for reasons related, directly or indirectly, to the reporting;
- c) Initiate necessary action against anyone who makes untruthful reports in bad faith.

This Policy applies to all Whistleblowing reports: internal, external, or public disclosures of reports.

For any doubts or need for clarification regarding the reporting process, please remember to contact the Senior Legal and Compliance Specialist who falls under the Legal and Compliance Department.

#### 5.1.1 4.1. Whistleblowing Reports

##### 5.1.2 4.1.1. Management of Internal Reports

This Policy, regarding the handling of so-called "Whistleblowing" reports, aims at promoting and reinforcing Haier's ethical standards and, more generally, Haier's core values, by establishing specific rules to be applied within the Group in case of reports of violations that could refer to:

- i. Code of Ethics;
- ii. ESG Business Code of Conduct;
- iii. Regulations, Policies, and internal procedures adopted by the Group;
- iv. Criminal and civil regulations applicable to the Group;
- v. Administrative, civil, or criminal accounting offenses;
- vi. Conducts relevant under Legislative Decree 231/01 or violation of the requirements of the Organization, Management and Control Models;
- vii. Crimes within the scope of relevant EU or national acts;
- viii. Crimes in the areas of public procurement, services, products and financial markets, money laundering prevention, product safety and compliance, transportation safety, environmental protection, food and feed safety, animal health and welfare, public health, consumer protection (antitrust), protection of life and personal data, and network and information system security;
- ix. Violations of competition and state aid laws;
- x. Violations of corporate tax laws.

Whistleblowing Reporting Management process could be consulted by accessing [ATTACHMENT A: Whistleblowing Reporting Management Process Flow Chart](#).

Recipients who detect or otherwise become aware of possible unlawful conduct or irregularities put in place, in the performance of their work activities or having an impact on the same, by individuals who have dealings with one or more Group companies, are required to comply with this Policy by reporting, without delay, the facts, events and circumstances that they believe, in good faith and on the basis of serious, precise and concordant factual elements, to have led to such violations and/or conduct that does not comply with Group principles.

Haier encourages Whistleblowers to submit reports made in good faith and based on facts they become aware of.

To support investigations and to facilitate an appropriate response, Reports should include:

- a) The precise description of the facts (including dates and place);
- b) The people involved in the violation as well as those who can provide information;
- c) supporting documentation.

It is strongly recommended that Reports be submitted through the **Haier Compliance Hotline EthicsPoint**, which allows the following reporting options:

- a) **Anonymous**: The Whistleblower remains totally anonymous;
- b) **Confidential**: the Whistleblower remains anonymous within the Group, but provides details to the EthicsPoint service provider;
- c) **Open**: The Whistleblower provides full details and allows the EthicsPoint service provider to disclose them to the Group. However, the identity of the whistleblower and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the whistleblower, to persons other than those competent to receive or follow up on the reports expressly authorized to process such data pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679, Article 2-quaterdecies of the Code on the Protection of Personal Data under Legislative Decree No. 196 of June 30, 2003 (so-called "Designated Persons" or "Authorized" by the Data Controller).

The Group encourages open or confidential Reports submitted through the **Haier Compliance Hotline EthicsPoint**, as (i) these facilitate related case management and subsequent communications with Whistleblowers and (ii) under this Policy, Whistleblowers are fully protected by the Group.

However, according to this Policy, the Group will still consider also reports submitted through channels other than the **Haier Compliance Hotline EthicsPoint**, and regardless of whether they are:

- a) **Anonymous**: when the identity of the Whistleblower is neither stated nor otherwise uniquely identifiable;
- b) **Confidential**: when the Whistleblower is known or recognizable, but the Report is not made publicly;
- c) **Open**: when the Report is made through identifiable means, making accessible all details related to the subject of the report and the identity of the reporter, subject to the conditions of Article 12, Legislative Decree 24/2023.

It is the responsibility of the reporter, including anonymous ones, to make **reports in good faith**, and in line with the spirit of this Policy: **reports that are manifestly unfounded, opportunistic and/or made for the sole purpose of harming the reported person or subjects otherwise affected by the report, will not be taken into**

**consideration and will be subject to sanctions and/or action before the competent Judicial Authority.**

#### 5.1.3 4.1.1.1 Content of Reports

Reports should include the following key information:

- a) Place, date and time of the suspected misconduct;
- b) employee(s) involved;
- c) relationship between the reporter(s) and the employee(s) involved;
- d) description of events;
- e) How the Reporter became aware of the reported facts;
- f) possible presence of witnesses;
- g) other relevant information needed to contextualize the reported event;
- h) attach available evidence to support the report.

#### 5.1.4 4.1.1.2 Objective Profile of Reports

The objective scope of reporting is extensive and includes the following violations:

- Administrative, civil, or criminal accounting offenses;
- conduct relevant under Legislative Decree 231/01 or violation of the requirements of the Organization, Management and Control Models;
- crimes within the scope of relevant EU or national acts;
- crimes in the areas of public procurement, services, products and financial markets, money laundering prevention, product safety and compliance, transportation safety, environmental protection, food and feed safety, animal health and welfare, public health, consumer protection (antitrust), protection of life and personal data, and network and information system security;
- violations of competition and state aid laws;
- violations of corporate tax laws.

Only those reports **involving facts or information found directly by the reporter** will be considered, **excluding "personal" complaints or claims.**

**The following may also not be the subject of reporting, public disclosure, or denunciation:**

- disputes, claims, or demands related to an interest of a personal nature of the reporting person or the person making a complaint to the Judicial Authority that pertain exclusively to his or her individual labour or public employment



relationships, or inherent in his or her labour or public employment relationships with hierarchically subordinate figures;

- reports of violations where they are already mandatorily regulated by the European Union or national acts specified in Part II of the Annex to the Decree or by national acts that constitute implementation of the European Union acts specified in Part II of the Annex to Directive (EU) 2019/1937, although not specified in Part II of the Annex to the Decree;
- reports of national security breaches, as well as procurement related to defence or national security aspects, unless such aspects are covered by relevant EU secondary legislation.

Finally, **they are excluded from the scope of application of the regulations set forth in Legislative Decree 24/2023:**

- disputes, claims, or demands related to an interest of a personal nature of the reporting person or the person making a complaint to the Judicial Authority that pertain exclusively to his or her individual labour or public employment relationships, or inherent in his or her labour or public employment relationships with hierarchically subordinate figures;
- reports of violations where they are already mandatorily regulated by the European Union or national acts specified in Part II of the Annex to the Decree or by national acts that constitute implementation of the European Union acts specified in Part II of the Annex to Directive (EU) 2019/1937, although not specified in Part II of the Annex to the Decree;
- reports of national security breaches, as well as procurement related to defence or national security aspects, unless such aspects are covered by relevant EU secondary legislation.

#### 5.1.5 4.1.1.3 Subjective Profile of Reports

Haier, in encouraging Recipients to promptly report possible unlawful conduct or irregularities, guarantees the protection of the confidentiality and identity of the reporter, in relation to the Report and the data contained therein, establishes the prohibition of adopting any retaliatory acts against those who make Reports as well as preserves the anonymity of the reporter or whoever has sent the Report, even in the event that the same should subsequently prove to be erroneous or unfounded.

Protection against acts of retaliation is provided to individuals who are part of the organization and/or related to the person of the whistleblower, be they:

- self-employed workers, partnership holders, freelancers and consultants;
- volunteers and trainees, paid and unpaid;

- shareholders and persons with functions of administration, department, control, supervision, or representation, even if such functions are exercised on a de facto basis.

These measures to protect against acts of retaliation apply extensively to all parties connected, in a broad sense, to the reporting party's organization and/or person, be they:

- facilitators (the people who assist the reporter in the reporting process, operating within the same work environment and whose assistance must be kept confidential);
- persons belonging to the same work environment as the reporter to whom the reporter is related by a stable emotional or kinship link;
- Work colleagues of the reporter who are related to him by a usual and current relationship;
- Entities owned by the whistleblower or for which the protected persons work, as well as entities that operate in the same work environment as the above-mentioned persons.

#### 5.1.6 4.1.2 Confidentiality and protection of the reporter

Haier appreciates and encourages **open communication with whistleblowers** and invites them to provide their name and contact information, which allows an open and transparent dialogue to be set up that is useful in providing all the information needed to accurately assess the subject of the report.

The name and the report, including any insights and requests, will be treated **confidentially** and will only be shared with relevant parties if required by applicable local laws and regulations, subject to confidentiality obligations to protect the identity of the reporting person, which provide for the express consent of the same, to persons other than those competent to receive or follow up on the reports expressly authorized to process such data pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679 and Article 2-quaterdecies of the Personal Data Protection Code set forth in Legislative Decree No. 196 of June 30, 2003.

Confidentiality, in addition to the identity of the reporter, is also guaranteed to any other information or element of the report from the disclosure of which the identity of the reporter can be directly or indirectly inferred.

Confidentiality is also ensured in the case of reports - internal or external - made orally through telephone lines or, alternatively, voice messaging systems or, at the request of the reporting person, through a direct meeting with the person managing the report.

The confidentiality of the reporter is protected even when the report is received by personnel other than those authorized and competent to oversee reports, to whom, in any case, the reports should be forwarded without delay.

In two cases expressly provided for by law, to disclose the identity of the whistleblower, in addition to the whistleblower's express consent, written notice of the reasons for such disclosure is also required:

- a) in disciplinary proceedings where the disclosure of the identity of the whistleblower is essential for the defence of the person charged with the disciplinary offense;
- b) in proceedings instituted because of internal or external reports where such disclosure is also indispensable for the defence of the person involved.

Haier reserves the right to request the reporter's authorization to disclose his or her identity where it is essential for the initiation of disciplinary and/or judicial proceedings against the perpetrator of the reported conduct.

In particular, within the framework of criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and within the limits provided for in Article 329 of the Code of Criminal Procedure; within the framework of proceedings before the Court of Auditors, the identity of the reporting person may not be revealed until the preliminary investigation phase is closed; within the framework of disciplinary proceedings, the identity of the reporting person may not be revealed, if the contestation of the disciplinary charge is based on separate and additional investigations to the report, even if consequent to it. If the charge is based, in whole or in part, on the report and the knowledge of the identity of the reporting person and is indispensable for the defence of the accused, the report will be usable for the purposes of disciplinary proceedings only if the reporting person expressly consents to the disclosure of his or her identity.

However, the possibility of **submitting the report in an anonymous form** is guaranteed, which has the same value as the identified one, since it too is marked by a system of so-called "encryption" that favours the "pseudonymization" of the person making the report, to ensure the protection of identity secrecy and confidentiality.

**Anonymous reports**, like identified reports, **must be thoroughly detailed** so that the disputed facts and situations are sufficient to be able to assess their merits and pursue the investigation.

In cases of **anonymous whistleblowing, reporting to judicial authorities, or public disclosure**, if the **reporting person is subsequently identified and retaliated against, retaliation protection measures apply**.

Any kind of threat, retaliation, sanction, or discrimination against the Recipients of this Policy as well as expressly referred to in Legislative Decree 24/2023, identified in Section 4.1.1.3, will not be tolerated.

**A Whistleblower who has made a report in good faith (*bona fide*) under this Policy is protected against dismissal without cause or unjustified disciplinary action, even if his or her concerns turn out to be unfounded.**

**Haier reserves the right to take appropriate disciplinary action against any person guilty of retaliating or threatening to retaliate against a Whistleblower,**

**without prejudice to the right of the claimants to legal protection if criminal or civil liabilities related to the falsity of what was stated or reported have been found against the Whistleblower.**

The Group may take appropriate disciplinary and/or legal measures to protect its rights, assets, and image.

#### **5.1.7 4.1.3 Confidentiality and protection of the reported person**

Haier adopts the same forms of protection provided to guarantee the confidentiality of the identity of the whistleblower even for the person allegedly responsible for the conduct or violation, without prejudice to any legal obligation to disclose the name of the Whistleblower (e.g., in response to requests from the National Judicial Authority).

Haier guarantees the Reported Person, only where such a right is provided for under the law, the right to be informed (within a reasonable period) about the allegations and any disciplinary measures against him or her, as well as the right to defence.

#### **5.1.8 4.1.4 False Reports**

The Whistleblower shall not report a report knowing that the information is false or misleading, nor shall or submit a report in bad faith. Any abuse of this rule may result in disciplinary action.

Haier reserves the right to proceed against anyone who, in bad faith, has made Reports that are false, unfounded, or opportunistic and/or for the sole purpose of slandering, defaming, or causing harm to the reported person or others named in the Report.

#### **5.1.9 4.1.5 Management of External Reports**

The National Anticorruption Authority (ANAC) activates an external reporting channel that ensures, including by encryption tools, the confidentiality of the identity of the reporting person, the person involved, and the person mentioned in the report, as well as the content of the report and related documentation.

The same confidentiality is guaranteed even when the report is made through channels other than those indicated in the first period or reaches personnel other than those in charge of processing reports, to whom it is in any case forwarded without delay.

External reports are made in written form through the computer platform prepared by ANAC and accessible at the following address: <https://www.anticorruzione.it/-/whistleblowing> or orally through telephone lines or voice messaging systems or, at the request of the reporting person, through a face-to-face meeting set within a reasonable time.

An external report submitted to a person other than ANAC shall be forwarded to ANAC, within seven days from the date of its receipt, giving simultaneous notice of the transmission to the reporting person.

The conditions for making external reporting, as stipulated under Article 6, Legislative Decree 24/2023, occur when:

- a) there is no provision within its work context for the mandatory activation of the internal reporting channel or this channel, even if mandatory, is not active or, even if activated, does not comply with the provisions of Article 4 of the Whistleblowing Decree;
- b) the reporting person has already made an internal report under Article 4 and the report has not been followed up;
- c) the reporting person has reasonable grounds to believe that, if he or she made an internal report, the report would not be effectively followed up or that the report itself might result in the risk of retaliation;
- d) the reporting person has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest.

#### **5.1.10 4.2 Public Disclosures of Reports**

A reporting person who makes a public disclosure benefit from the protection provided by law if, at the time of the public disclosure, one of the following conditions is met:

- a) the reporting person has previously made an internal and external report, or has directly made an external report, under the conditions and in the manner prescribed by the relevant law, and feedback has not been given within the prescribed time limit and on the measures planned or taken to follow up the reports;
- b) the reporting person has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest;
- c) the reporting person has well-founded reason to believe that the external report may carry the risk of retaliation or may not be effectively followed up because of the specific circumstances of the case, such as those where evidence may be concealed or destroyed or where there is a well-founded fear that the reporting person may be colluding.

#### **5.1.11 4.3 Audit Activities based on Whistleblowing reports**

Verification activities regarding the substantiation of the circumstances represented in the Report are the responsibility, for the entire Group and subject to any specific local laws on the subject, of the EU Internal Audit Department, which is entrusted with a timely and thorough investigation, in accordance with the principles of impartiality, fairness and confidentiality with respect to all those involved.

In the course of the audits, the EU Internal Audit Department may avail itself of the initial support of the Senior Legal and Compliance Specialist HQ who, having carried out a preliminary assessment regarding the concrete and effective grounds for the report, based on the regulatory requirements, identified pursuant to Legislative Decree 24/2023, and the type and/or subject of the report, contributes to the involvement of the corporate functions from time to time competent and, where deemed appropriate, of external consultants specialized in the field of the report received and whose cooperation is functional to the ascertainment of the same, ensuring the confidentiality and anonymization of any personal data contained in the report.

Upon the outcome of the verification phase, the EU Internal Audit Department prepares a report summarizing the investigations carried out and the evidence that has emerged (so-called "Report"), sharing it, based on the outcomes, with the Senior Legal and Compliance Specialist HQ and the corporate functions from time to time in charge, in order to define any intervention plans to be implemented and the actions to be taken to protect the Group, also communicating the results of the investigations and verifications carried out, with respect to each report, to the heads of the corporate functions affected by the contents of the report.

Otherwise, should the conclusion of the analysis reveal the absence of sufficiently circumstantial elements, or, in any case, the groundlessness of the facts referred to in the report, the report will be dismissed, together with the relevant reasons, by the EU Internal Audit Department.

The EU Internal Audit Department reports periodically on the types of reports received and the outcome of audit activities to Haier Europe's CEO and EU Legal and Compliance Department.

#### 5.1.12 4.3 RACI Matrix

N/A.

### 6. 5. Reporting Procedure

The methods of reporting expressly provided for under Legislative Decree 24/2023 are as follows:

- i. **In written form, including computer-based methods** (online platform);
- ii. **orally, alternately through telephone lines, voice messaging systems or face-to-face meeting** (upon request).

If the reporter wishes to report suspected cases of misconduct or wrongdoing, either in an identified form or anonymously<sup>1</sup>, **in writing**, he or she may do so through one of the following channels:

**1. Haier Compliance Hotline Ethics Point (Corporate Whistleblowing Platform)**

Cloud-based digital platform, active 7 days a week, h 24, accessible from any device via web.

The Site, which can be reached in both English and Italian, can be found at the following link: <https://secure.ethicspoint.eu/domain/media/it/gui/101937/index.html>.

**Reports, made through a digital platform, can be submitted in either English or Italian.**

Anyone who files a report, through the **Haier Compliance Hotline EthicsPoint**, will receive a report identification number. If the reporter so requests, none of his or her personal information will be recorded. After receiving the report, **NAVEX Global** (the Hotline's system) will automatically send an email respectively to the Corporate Legal and Compliance Department, based in Tsingtao, Shandong, China in the HQD and the Office responsible for monitoring and receiving complaints from the **Compliance Hotline**, which is currently the Global Audit & Risk Management ("**GARM**") Office.

**GARM** is:

- independent of individual business units or regional reporting lines and experienced in handling sensitive information and the investigation procedure.
- responsible for receiving and monitoring information from the Haier Compliance Hotline.

The GARM Office will review the report and, in the case of a complaint regarding HQ Italy, the GARM Office will meet with the Internal Audit Department ("**EU IA**") to arrange the appropriate investigation procedure.

Anyone can report cases of suspected misconduct or wrongdoing by accessing the Haier Compliance Hotline website.

The Haier Compliance Hotline is managed by NAVEX Global, an independent third party appointed by the Corporate Group level (HQD, headquarters).

**2. E-mail to [690legal@haier.com](mailto:690legal@haier.com)**

<sup>1</sup> Anonymous reporting may be restricted according to the local laws of the country to which the reporter belongs.

This e-mail box is managed by GARM with respect for confidentiality and privacy.

Any report submitted through this e-mail box will be processed in the manner described in the box above under 1).

If, on the other hand, the reporter wishes to report suspected cases of misconduct or wrongdoing, either in an identified form or anonymously, **orally**, he or she may do so through one of the following channels:

3. **Telephone hotline**, which can be reached from an outside line **by dialling the following international toll-free number (ITFS) valid for Italy: 800-877861.**
4. **Voice messaging.**
5. **Face-to-face meeting with the EU Internal Audit Department ("EU IA")** - set within a reasonable time - at the request of the reporter.

**In case the report, also forwarded anonymously and received through channels sub 1) 2) 3) and 4), concerns Candy Hoover Group S.r.l., Elba Italy S.p.A., Candy S.p.A.<sup>2</sup> or EuroPalTners Italia S.r.l.<sup>3</sup> and concerns Legislative Decree no. 231/2001 (e.g., Violation of Models 231 or risk-offenses pertinent to 231 prerequisite cases) violations, the EU Internal Audit Department will promptly inform the Supervisory Board, appointed pursuant to Legislative Decree No. 231/2001 of the corresponding Group Company, which the report is referred to, in order to coordinate audit activities, with the HQ Senior Legal and Compliance Specialist support<sup>4</sup> .**

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<sup>2</sup> Reports concerning Candy S.p.A. will be handled through the internal channel, set up in accordance with Legislative Decree 24/2023 and referred to in Candy S.p.A. Organization, Management and Control Model due to Article 6, paragraph 1, letter a) of Legislative Decree 231/2001.  
External reports or public disclosures will not be considered applicable.

<sup>3</sup> Reports concerning EuroPalTners Italia S.r.l. will be handled through the internal channel, set up in accordance with Legislative Decree 24/2023, and referred to in Article 6, no.1, paragraph 2-bis, Legislative Decree 231/2001.

External reports or public disclosures will not be considered applicable.

<sup>4</sup> The HQ Senior Legal and Compliance Specialist, within the Legal and Compliance Department:

- **monitors** the internal **reporting management system** is **correct** and compliant with **legal regulations, monitoring** any **regulatory changes** and the introduction/amendment of new obligations for the purpose of adapting the system;
- **performs a preliminary substantiation assessment about the report**, supporting the EU Internal Audit Department in handling the report received and coordinating with the Supervisory Board, if the subject and/or content of the report has 231 relevance;
- **supports** the **EU Internal Audit Department**, in the **handling** and **resolution of reports**, which is responsible for the completeness, integrity and archiving of the case.



**Decisions on such reports and subsequent audit activities, if any, to be activated are under the EU Internal Audit Department responsibility and shared with the Supervisory Board.**

**In case the report concerns all the other hypothetical violations mentioned under Section 4.1.1.2, the EU Internal Audit Department may inform HQ Senior Legal and Compliance Specialist, to be supported within audit activities, also involving all other corporate functions concerned.**

If the reporter wishes to make the report to his or her direct supervisor or anyone else within the organization, the recipient **MUST** report the report immediately through the official channels mentioned above and without sharing the information with anyone within the organization. Sharing information through unofficial channels could affect the results of the investigation.

Regardless of the channel chosen, the report will be managed **promptly, confidentially, and professionally.**

For greater efficiency in the management procedure, **it is strongly recommended to submit reports through the Corporate digital platform "Haier Compliance Hotline".**

## 7. 6. Investigation Procedure

### **All reports will be taken seriously by Haier Europe.**

EU Internal Audit Department – promptly alerted by the GARM Office – with HQ Senior Legal and Compliance Specialist support and Supervisory Board involvement – if the report concerns violations relevant to Legislative Decree 231/2001 – performs the following activities:

- a) provide the reporter with an acknowledgement of report's receipt within seven days from the reception date;
- b) keeps interlocutions with the reporter and may request additions from him/her, if necessary;
- c) diligent follow-ups to the received reports;
- d) provides report acknowledgement, within three months from the acknowledgement reception date; in case of such acknowledgement absence, within three months from the seven-day period expiration starting from report submission;
- e) makes available clear information on the channel, procedures, and preconditions for making internal reports as well as the channel, procedures, and preconditions for making external reports.

The aforementioned information shall be displayed and made easily visible in workplaces, as well as accessible to persons who, while not attending workplaces, have a legal relationship with Haier.

Each report will be analysed to assess whether an investigation is necessary.

As indicated in the last paragraph of paragraph 5, if the report concerns Candy Hoover Group S.r.l., **Elba Italy S.p.A.**, **Candy S.p.A.**<sup>5</sup> or **EuroPaITners Italia S.r.l.**<sup>6</sup> and **relates to Legislative Decree 231/2001 (e.g., Violation of Models 231 or crime risks pertinent to 231 prerequisite cases) violations, the Supervisory Board will be promptly informed.**

**Decisions on these reports and subsequent verification activities, if any, to be activated are the responsibility of the EU Internal Audit Department, which, supported by the HQ Senior Legal and Compliance Specialist and coordinating with the Supervisory Board, initiates the necessary investigations and any audit activities.**

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<sup>5</sup> Reports concerning Candy S.p.A. will be handled through the internal channel, set up in accordance with Legislative Decree 24/2023 and referred to in Candy S.p.A. Organization, Management and Control Model due to Article 6, paragraph 1, letter a) of Legislative Decree 231/2001.  
External reports or public disclosures will not be considered applicable.

<sup>6</sup> Reports concerning EuroPaITners Italia S.r.l. will be handled through the internal channel, set up in accordance with Legislative Decree 24/2023, and referred to in Article 6, no.1, paragraph 2-bis, Legislative Decree 231/2001.  
External reports or public disclosures will not be considered applicable.

**In case the report concerns all the other cases of violations mentioned in Section 4.1.1.2, the EU Internal Audit Department may inform the HQ Senior Legal and Compliance Specialist, to be supported in the investigation activity, also involving all the other corporate functions concerned.**

Reports involving violations of the Antitrust Law as well as the Antitrust Compliance Program will be promptly reported to the Antitrust Compliance Officer, who **will initiate the necessary investigations and investigation activities, supported by the HQ Senior Legal and Compliance Specialist and coordinated by the EU Internal Audit Department.**

**Decisions on these reports and any subsequent verification activities to be activated are under the EU Internal Audit Department responsibility.**

## 8. 7. Conflict of interest

The procedure ensures reports handling is entrusted to individuals who do not have a conflict of interest.

If the report concerns an allegation of misconduct or wrongdoing referable to one or more of the members of the Internal Audit Department EU, HQ Senior Legal and Compliance Specialist or the Supervisory Board (pursuant to Legislative Decree no. 231/2001), the individuals concerned will be denied accessing to the report.

This control mechanism, aimed at preventing reports mishandling, is guaranteed by the GARM Office, which will avoid any individuals in conflict-of-interest position involvement.

In particular, the report relating to the EU Internal Audit Department or HQ Senior Legal and Compliance Specialist will be directly addressed to Haier Europe's CEO, who will manage it following this Policy criteria; the report relating to any Supervisory Board member will also be addressed to the CEO; in case of a report relating to misconduct or wrongdoing referable to one or more Board of Directors members or any Sister Company management body members, the GARM, with the support of the General Counsel, will manage the report by promptly notifying it to the CEO.

These provisions will also apply if a conflict of interest arises after the report reception, causing people involved to be replaced in the respective roles according to the above rules. All conflict-of-interest situations must be disclosed without hesitation.

## 9. 8. Processing of Personal Data

Haier informs that the personal data (including any special categories of data, such as racial and ethnic origin, religious and philosophical beliefs, political opinions, membership of political parties, trade unions, as well as personal data apt to reveal the state of health and sexual orientation) of the Reporting Parties and of other persons who may be involved, acquired in connection with the management of the Reports, will be processed in full compliance with the provisions of the regulations in force on the protection of personal data and in any case in line with the provisions of the Haier Europe Data Privacy and Protection Policy of the Group, which can be consulted at the following address via SharePoint: ([Haier Europe Data Protection Policy](#)), of the Privacy Policy to the full consultation of which please refer to the Corporate Website, and limited to those strictly necessary to verify the validity of the Report and for the management of the same.

Refer to the [Attachment B: Whistleblowing Privacy notice](#), for more details on how there will be personal data processed.

The processing of personal data will be carried out by the Internal Audit EU Department as authorized entities for processing (subject to any specific local regulations on the matter), for the sole purpose of implementing the procedures established in this Policy and, therefore, for the proper management of the

Reports received, in addition to fulfilling legal or regulatory obligations in the full

Respect for confidentiality, fundamental rights and freedoms, and the dignity of those concerned.

Processing operations will be entrusted, under the supervision of the EU Internal Audit Department, to employees duly appointed as "designated" or "authorized" persons and specifically trained in relation to the execution of whistleblowing procedures, with reference to security measures and the protection of the confidentiality of the persons involved and the information contained in the Reports.

The personal data contained in the Reports may be communicated by the Internal Audit EU Department to the corporate bodies and internal functions that may be competent from time to time, as well as to the Judicial Authority, for the purpose of activating the procedures necessary to guarantee, as a result of the Report, appropriate judicial and/or disciplinary protection against the reported subject(s), where the elements collected and the investigations carried out reveal the grounds for the circumstances initially reported. In some cases, the data may also be communicated to specialized external parties as described in Section 5.

During the activities aimed at verifying the validity of the Report, all necessary measures will be taken to protect the data from accidental or unlawful destruction, loss, and unauthorized disclosure. In addition, documents related to the Report will be retained, both in paper and electronic format, for a period no longer than necessary for the proper finalization of the procedures established in this Policy.

## 10. 9. Policy issuance and revision

This Policy is issued by the Legal & Compliance Department, published, and made available to all employees. The Legal & Compliance Department has the right to revise, replace and amend the Policy in case any corporate governance structure's changes or significant regulatory / legal environment implementation – which affect operational / business activities – may occur.

This Policy is also shared with the Company Trade Union Representatives referred to in Article 51 of Legislative Decree No. 81 of 2015, pursuant to Article 4 of Legislative Decree 24/2023.

## 11. 10. Policy violations

If Haier Europe is made aware of any violations of this Policy or any event or circumstance that gives rise to an actual or suspected violation of any law relating to sanctions or business controls by any of its employees or business partners, it will initiate an internal investigation and involve law enforcement and other appropriate authorities as necessary.

All Employees are responsible for compliance with this Policy and any other documents designed to implement it.

Where a disciplinary offense is found to have been committed, in violation of this Policy, a penalty appropriate to the type of violation committed and the position held and/or the duties performed by the perpetrator will be imposed on the individual responsible.

The type and size of the penalty shall also be proportionate to the seriousness of the established fact and shall be determined considering:

- a) the manner of the conduct;
- b) the harmful consequences and/or risks involved;
- c) the wilful or negligent nature of the violation and the intensity or degree of the subjective element;
- d) the behaviour following the violation;
- e) the responsible person's disciplinary record, if any;
- f) the possible commission of multiple violations with the same conduct;
- g) the possible complicity of more than one person in the commission of the violation.

### **Penalties applicable to Executive Directors and/or Board members**

In case it is determined that one of the violations listed in Article 3 has been committed by a director of the Company, considering the seriousness of the act and the other criteria set forth in Article 5, one or more of the following sanctions will be imposed:

- i. the statement of censure recorded in the minutes of the board meetings;
- ii. the formal warning;
- iii. the revocation of any proxies given to the director;
- iv. the convening of a shareholders' meeting to adopt a resolution to remove a director from office, constituting, the violation established, just cause for removal from office.

If the violation is ascertained against a director who is also linked to the Company by a subordinate employment relationship, in addition to the sanctions referred to in this Article 6, one or more of the sanctions referred to in Article 8 below may be imposed, if the conditions are met. In such a case, if a dismissal for just cause is adopted, a shareholders' meeting must be convened to adopt a resolution to dismiss the director for just cause.

#### **Penalties applicable to Statutory Board of Auditors members**

In case it is ascertained that one of the violations listed in Article 3 has been committed by an auditor of the Company, considering the seriousness of the act and the other criteria set forth in Article 5, one of the following sanctions will be imposed:

- i. The statement of censure recorded in the minutes of the meetings of the board of auditors;
- ii. the formal warning;
- iii. the convening of the shareholders' meeting to adopt a resolution to dismiss the office for cause, subject to the approval of the court constituting, the established violation, just cause for dismissal of the office.

#### **Penalties applicable to managers**

If it is ascertained that a disciplinary offence has been committed by a manager of the Company, the sanction deemed most appropriate shall be imposed in accordance with the provisions of current legislation and the applicable National Collective Labor Agreement, considering the seriousness of the act and the other criteria set forth in Article 5.

If the disciplinary offense constitutes a crime or, in any case, is so serious as to irreparably damage the relationship of trust with the Company, the perpetrator will be subject to dismissal for just cause.

#### **Penalties applicable to other employees**

If it is established that a cadre, employee, or worker of the Company has committed a disciplinary offense, considering the seriousness of the act and the other criteria set forth in Article 5, one of the following sanctions shall be imposed:

- i. the oral warning;
- ii. the admonition;
- iii. a fine of not more than three hours' hourly pay calculated on the minimum wage scale;
- iv. suspension from work and pay up to a maximum of three days;
- v. dismissal, with or without notice.

The warning consists of a verbal dispute of the offense and a warning against repeating it.

Admonition consists of a written challenge and censure of the offense.

### **Penalties applicable to Third Parties**

In case it is ascertained that a violation among those indicated in Article 3 has been committed by Third Parties, a warning will be issued to prompt compliance with the Model, the Code of Ethics and other supplementary or implementing provisions, or the activation of the remedy provided for in the contracts that bind the Third Parties to the Company deemed most appropriate, taking into account the seriousness of the fact and the other criteria set forth in Article 5.

Remedies that may be provided in contracts that bind the Company to Third Parties include but are not limited to and in order of severity, warning, application of a penalty, suspension, and early termination of the relationship.

### **Proceedings applicable against managers and other employees**

The Company's Human Resources Department is the competent body to impose disciplinary sanctions against all employees, in accordance with the procedure set forth in Article 7 of the Workers' Statute and the applicable National Collective Agreement.

This procedure shall also apply where it is reported that a disciplinary offence has been committed by a director also linked to the Company by a contract of employment. If, because of the proceedings, the sanction of dismissal is imposed, the board of directors shall convene the shareholders' meeting without delay for the adoption of the revocation measure.

### **Proceedings applicable against directors and auditors**

In the event of a violation under Article 3 by one or more directors not in an employment relationship with the Company and/or auditors, the supervisory body will inform the board of auditors and the board of directors.

Unless there are special reasons for urgency, within fifteen days of receiving the report from the supervisory body, the board of directors shall summon (by written notice) the alleged violator to appear at a board meeting. The summons must be in writing and signed by the chairperson of the board of directors or at least two directors not involved in the disciplinary proceedings. If the alleged violator is the chairperson of the board of directors and/or there are not at least two directors not affected by the disciplinary proceedings, the board meeting will be convened by the chairperson of the board of auditors.

At the meeting, which the members of the board of auditors and the supervisory body are also invited to attend, the alleged perpetrator of the disciplinary offense will have the right to defend himself or herself orally and by submitting any written deductions.

The board of directors, even after further investigation as deemed appropriate, will rule either to dismiss or to apply a disciplinary sanction, giving reasons for the decision.

In case of proceedings against a director of the Company, the board of directors will deliberate with the abstention of the alleged perpetrator of the disciplinary offense.

A copy of the minutes of the meeting will be sent to the person concerned as well as to the supervisory body.

### **Procedure applicable against Third Parties**

Disciplinary sanctions are imposed against Third Parties by the director of the organizational unit of the Company managing the contractual relationship concerned.

Specifically, within ten days of receipt of the report, the director of the organizational unit that manages the contractual relationship, in agreement with the legal function - after notifying the contractual counterparty and, if different, the alleged perpetrator of the disciplinary offense - activates the contractual remedies provided for in the contract that binds the Third Party to the Company deemed most appropriate.

### **The disciplinary measure**

The measure by which the disciplinary sanction is applied must be adequately justified. It must in all cases be communicated to the supervisory body.

Disciplinary measures are communicated by the personnel department to the person concerned.

Haier's HR Department HQ keeps track of sanctions imposed by establishing and updating the register of disciplinary sanctions imposed.



**Filing of proceedings**

Any filing must be justified and communicated to the supervisory body.

When the report of disciplinary infraction concerns a director of the Company, the decision to dismiss must be communicated to the Board of Auditors and the Shareholders' Meeting.

**Retention of documentation**

The Board of Directors shall ensure the preservation of all documentation regarding pending and concluded disciplinary proceedings, including archiving, ensuring its confidentiality pursuant to Regulation No. 2016/679 and Legislative Decree No. 196/2003 (as subsequently amended by Legislative Decree No. 101/2018).

Without prejudice to the above-mentioned liability profiles, ANAC shall apply the following administrative pecuniary sanctions to the person in charge:

- a) 10,000 to 50,000 euros when it determines that retaliation has been committed or when it determines that the report has been obstructed or attempted to be obstructed or that the duty of confidentiality under Article 12 has been violated;
- b) 10,000 to 50,000 euros when it determines that reporting channels have not been established, that procedures for making and handling reports have not been adopted, or that the adoption of such procedures is not in accordance with those referred to in Articles 4 and 5, and when it determines that the verification and analysis of the reports received has not been carried out;
- c) 500 to 2,500 euros, in the case referred to in Article 16, paragraph 3, unless the reporting person has been convicted, even at first instance, of the crimes of defamation or slander or otherwise of the same crimes committed with the report to the judicial or accounting authority.

Entities in the private sector referred to in Article 2, paragraph 1, letter 1, number 3), shall provide in the disciplinary system adopted pursuant to Article 6, paragraph 2, letter e), of Decree No. 231 of 2001, sanctions against those they ascertain to be responsible for the offenses referred to in paragraph 1.

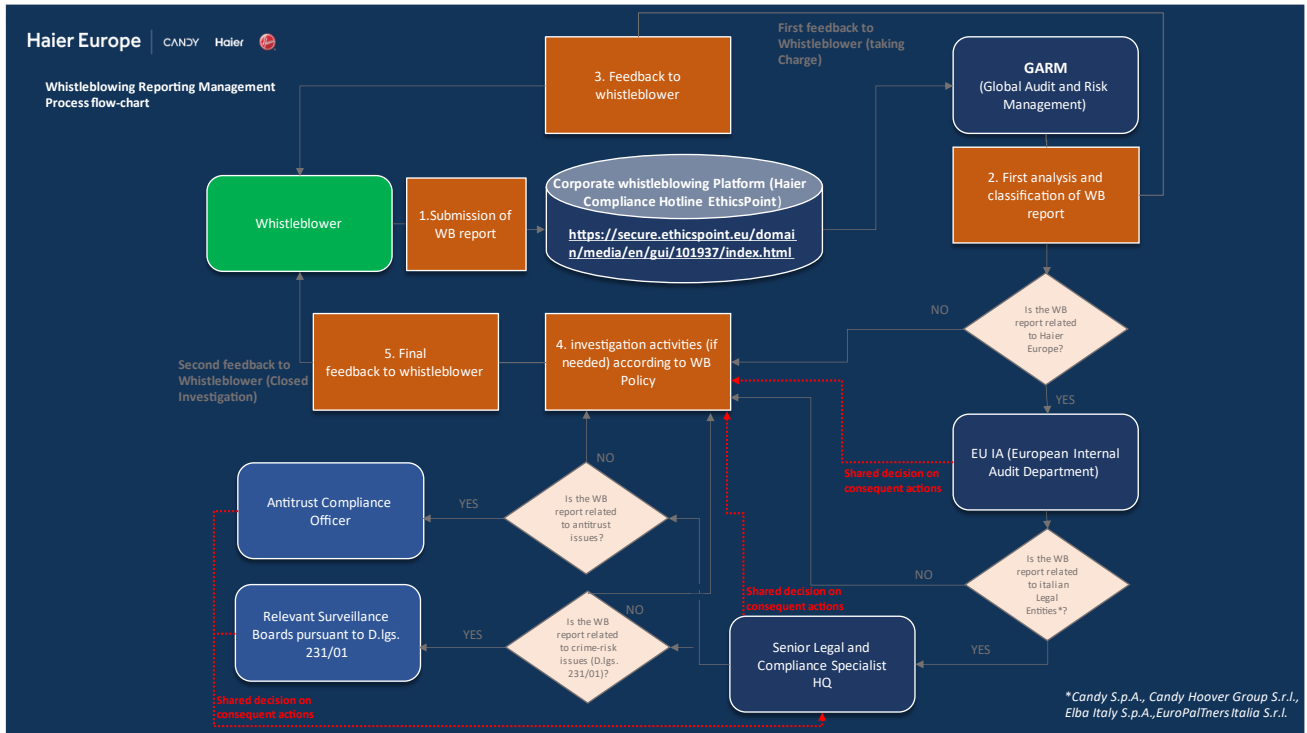
**12. 11. Form**

N/A.

**13. 12. Changes History**

<b>Rev. #</b>	<b>Revision Date (dd mmm yy)</b>	<b>Effective Date (dd mmm yy)</b>	<b>Description of Change</b>	<b>Created by / Changed by</b>
A	ALL	30/06/21	First version	Senior Legal and Compliance Specialist
B	5	09/03/22	<p>Second version incorporates regulatory changes introduced by Law 179/2017, on "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship," and introduces the following new features:</p> <ul style="list-style-type: none"> <li>i. Confirmation of reporting within 7 days</li> <li>ii. Reporting by the reporter to the supervisor</li> </ul>	Senior Legal and Compliance Specialist
C	ALL	04/06/24	Third version released due to new Business Ethics & Integrity documents references (e.g., ESG Business Code of Conduct) included, DMS encoding due to the new Quality Documents System Management enforcement, Attachment A, B provided.	Senior Legal and Compliance Specialist

### 14. ATTACHMENT A: WHISTLEBLOWING REPORTING MANAGEMENT PROCESS FLOW CHART



## 15. ATTACHMENT B: WHISTLEBLOWING PRIVACY NOTICE

Hereby, Haier Europe wishes to inform the data subjects about the processing of their personal data to report any misconduct, in accordance with the European Regulation on the protection of personal data no. 679/2016 (hereinafter referred to as the "**European Regulation**") and all applicable laws.

### 1. Data controller and data protection officer

The data controller in relation to the processing of personal data described in this notice is the Haier Europe Group company that is the employer of the worker (hereinafter referred to as the "Controller") or, for external users, Candy Hoover Group S.r.l. The Controller can be contacted by using the address details specified in article 10 below.

The Controller has appointed a Data Protection Officer ("**DPO**"), who can be contacted at the references indicated in paragraph 11 of this notice.

### 2. To whom does the Notice apply?

This privacy policy on the processing of personal data applies to:

- a) employees;
- b) persons performing coordinated and continuous services for the benefit of the Haier Europe Group companies, self-employed sub-contractor, or self-employed workers; and
- c) any other natural person who carries out a work activity in any capacity, regardless of the type of contract, in favour of the Haier Europe Group companies; and
- d) any other natural person reporting any suspected fraud, discrimination/ harassment, suspected violation of labour law and certain other — not criminal — offences which has taken place within the Haier Europe Group companies.

Hereinafter as the "**Data Subjects**".

with this notice, the Controller provides the Data Subjects with the necessary information on the processing of his personal data, as required by applicable legislation.

### 3. What Data is processed?

The processing described in this notice concerns the personal data of the Data subjects collected on the confidential online reporting system "Haier Compliance Hotline – EthicsPoint". **However, it is possible to use the platform anonymously.**

If the Data Subject voluntarily mentions his identity, the types of personal data that could be processed include the following data:

- a) name and contact details;
- b) name and title of the person(s) engaged in the reported misconduct;
- c) details of the misconduct;
- d) special categories of data pursuant art. 9 GDPR if entered by the data subject in the form. (Hereinafter, jointly with the data referred to in points a) to e) above, the "**Data**").

#### **4. For what purposes are the Data processed?**

The Data of the Data Subjects will be processed for the following purposes:

- a) to fulfil a legal or regulatory obligation and fulfil or require the fulfilment of specific obligations or perform specific tasks provided for by EU legislation, laws, regulations or collective agreements, including corporate agreements;

(Hereinafter referred to as the "**Purpose of Law**");

- b) to ensure the defence of assets and people and to prevent fraud in compliance with the regulations on the protection of personal data and Workers' rights;
- c) to pursue the purpose of ascertaining, exercising or defending a right of the Controller, or of other companies of the group to which the Controller is a party, in judicial proceedings also in reference to suspected offences, disturbances or damages to the detriment of the Controller and/or the group, including its employees/collaborators and/or commercial counterparties;
- d) to transmit the personal data of the Data subjects within the business group of which the Controller is a part for administrative and organizational purposes.

(hereinafter referred to as the "**Purposes of Legitimate Interest**").

If the data subject enters special categories of data pursuant to art. 9 GDPR in the form, those will be processed according to art. 6 par. 1, lit. c) and 9, par. 2, lit. g) of GDPR.

#### **5. On what basis are the Data processed?**

The processing for the **Purpose of Law** referred to is carried out pursuant to Article 6, point c) of the European Regulation to fulfil a legal or regulatory obligation.

The processing for the **Purposes of Legitimate Interest** referred to is carried out pursuant to Article 6, point f) of the European Regulation for the pursuit of the legitimate interest of the Controller, which is equally balanced with the interest of the Data Subjects, as the activity of Data processing is limited to what is strictly necessary for:

- with reference to paragraph 4, point b), to ensure the defence of property and persons;
- with reference to paragraph 4, letter c), to protect the security of IT systems and to identify any illegal behaviour;
- with reference to paragraph 4, point d), proceed with the transfer of data for administrative purposes to the other companies of the group to which the Controller is a party in accordance with the Privacy Regulation.

Processing for the Purposes of Legitimate Interest is not mandatory and the Applicant may object to such processing in the manner described in paragraph 10 of this Notice; should the Data Subject object to such processing his or her Data may not be used for the Purposes of Legitimate Interest, except in the case where the Company proves the presence of overriding binding legitimate reasons or the exercise or defence of a right pursuant to article 21 of the Privacy Regulation.

#### **6. How is Data processed?**

In relation to the above-mentioned purposes, the Data will be processed both with the aid of computerized or automated tools and on paper and will be protected through appropriate measures to ensure the confidentiality and security of personal data. In particular, the Controller adopts appropriate organizational and technical measures to protect the Data in its possession against loss, theft, and unauthorized use, disclosure, or modification of the Data.

## **7. To whom is the Data communicated?**

For the purposes set forth in paragraph 4, the Data Controller may communicate - in whole or in part - the Data of the data Subjects to the following categories of subjects:

- a) other Workers of the company or of the subjects indicated below, as data processors, within the scope of their respective duties and within the limits established by law;
- b) external advisors retained to assist in investigating the report;
- c) public or private entities, including health bodies, doctors responsible for the management of visits and fulfilments of legal obligations, social security and supplementary health care funds, including corporate, patronage and social assistance institutions, tax assistance centres, insurance companies, employment agencies, associations and trade union organizations of employers and labour providers, freelancers, bodies or consortia, associations, bodies, public administrations, trade union associations, as independent data controllers or data processors;
- d) suppliers of instrumental or support services to those performed by the Controller and therefore, by way of example but not limited to, experts, consultants, lawyers, auditing companies, leasing companies, technology service providers, marketing agencies, credit institutions, as independent data controllers or data processors;
- e) supervisory and control bodies;
- f) other companies belonging to the group to which the Controller belongs, located in Italy and abroad, as data processors or independent data controllers;
- g) competent administrative or judicial authorities, upon legitimate request; and
- h) transferors of company or branch of business, companies resulting from possible mergers, divisions or other transformations of the Controller, as independent data controllers.

Some of the subjects listed above may be located in countries outside the European Union or the European Economic Area. In this case, the Data will be communicated in accordance with the following paragraph.

## **8. Are Data transferred abroad?**

For specific requirements connected to the location of the servers of Haier Europe and/or its providers, Haier Europe also relies on providers - in their capacity as data processors - located in third countries outside the European Union (United Kingdom). Your data may also be communicated between Haier group companies with registered office in third countries outside the European Union (China and Singapore). In case of international transfer of data to countries outside the European Union recognized by the European Commission as providing adequate protection (United Kingdom), Haier Europe will transfer personal data according to art. 45 of GDPR. In case of international transfer of data to countries outside the European Union not recognized by the European Commission as providing adequate protection (China and Singapore), Haier Europe undertakes to guarantee

adequate levels of protection and safeguards by entering into standard contractual clauses. To obtain a copy of the standard contractual clauses you can contact the Data Controller and write to the email addresses specified in the [WHO WE ARE] section of this notice.

### **9. How long is the Data retained for?**

The Data is kept for a period of 10 years, except in cases in which the keeping for a subsequent period is required for any litigation, requests by the competent authorities or under applicable law. At the end of the retention period the data will be deleted, anonymised or aggregated.

### **10. What are the rights of the Data Subjects?**

Without prejudice to the possibility of the Data Subject not to provide his/her own Data, the Data Subject may, at any time and free of charge:

- a) obtain confirmation of whether data which concerns him/her exists or not;
- b) know the origin of the Data, the purposes of the processing and its methods, as well as the logic applied to the processing carried out by electronic means;
- c) ask the updating, correction or - if he/she is interested in this - the integration of the data that concerns him/her;
- d) obtain the cancellation, transformation into anonymous form or blocking of any Data processed in violation of the law, and oppose, for legitimate reasons, the processing;
- e) revoke his/her consent, if previously given;
- f) ask the Controller the limitation of the processing of Data regarding him/her, if: (i) the Data Subject disputes the correctness of the personal data, for the period required for the Controller to check the correctness of said Data; (ii) the processing is illicit and the Data Subject opposes the deletion of the Data and requires instead that their use be limited; (iii) although the Controller no longer requires them for processing, the Data is required by the Data Subject for the verification, exercise or defence of a right before the court or extrajudicial; (iv) the Data subject has opposed the processing pursuant to article 21, paragraph 1 of the European Regulation, while awaiting verification of the possible prevalence of the legitimate rights of the Controller over those of the Data subject himself/herself;
- g) oppose at any time the processing of his/her Data for Purposes of Legitimate Interest;
- h) request the deletion of Data concerning him/her without undue delay and
- i) obtain the portability of Data concerning him/her.

The Data Subject will also have the right to make a complaint to the Supervisory Authority for the Protection of Personal Data to the contacts available on the site [www.garanteprivacy.it](http://www.garanteprivacy.it) if the conditions are met.

Requests for the exercise of rights can be made in writing to the Controller, who can be contacted at the following email address [data.protection@candy-group.com](mailto:data.protection@candy-group.com) or by post by writing to:

Candy Hoover Group S.r.l.

Via Privata Eden Fumagalli

20861 Brugherio (MB), Italy

f.a.o. Data Protection Officer.

The Controller can be contacted also by writing to the registered address of the employer.

### **11. DPO**

The Controller has appointed a DPO who can be contacted in a secure and confidential manner, at any time, in case of general questions about the processing of personal data, or for any data protection issues. The Data Protection Officer's email address is: [dpo@candy-group.com](mailto:dpo@candy-group.com).

### **12. Modifications and updates**

The Controller may make changes and/or additions to said Notice, also as a consequence of any subsequent regulatory changes and/or additions. The text of the updated Notice will be published on the company Intranet and on the confidential online reporting system "Haier Compliance Hotline – EthicsPoint".

Form

I confirm that I have read the contents of the Haier Europe's Privacy Notice above.